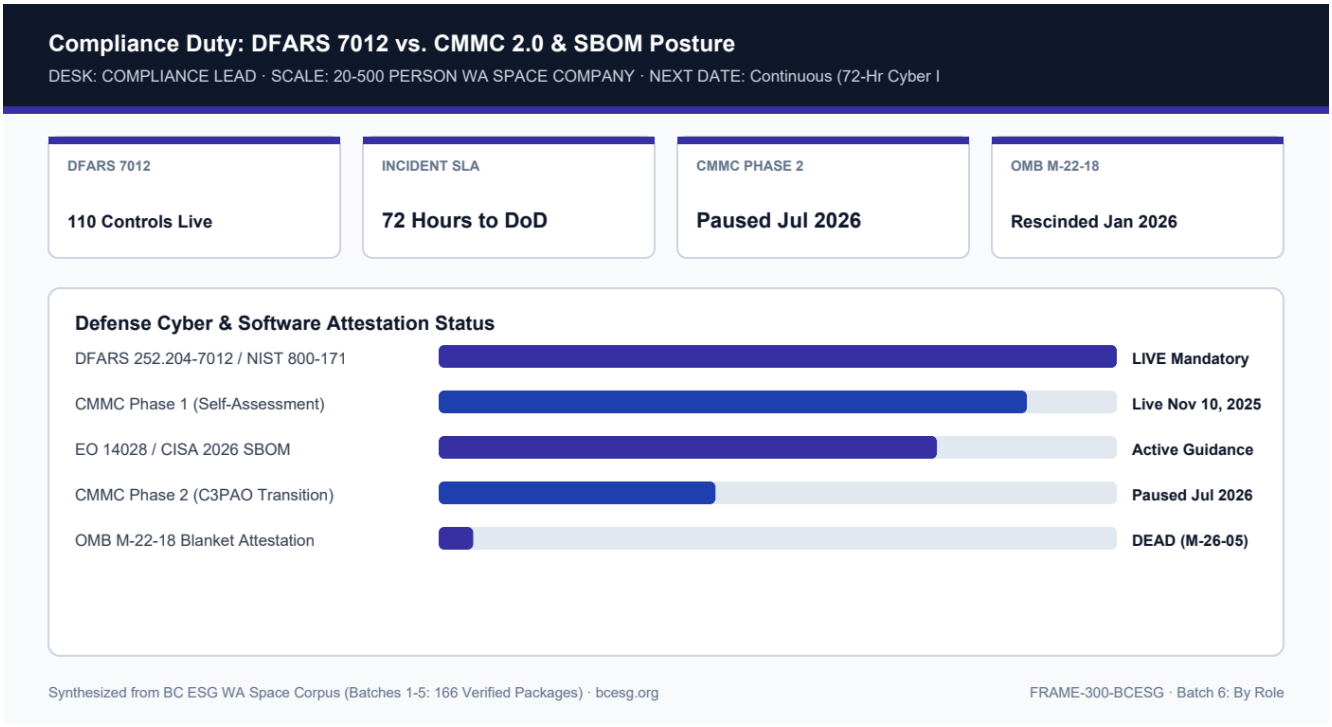
Compliance Lead Duty: DFARS 252.204-7012, NIST SP 800-171 & CMMC 2.0 Phase 2 Pause

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Role: Compliance Lead | **Top Live Mandate:** DFARS 252.204-7012 (110 Controls + 72-Hr Reporting) | **Dead Rule to Ignore:** OMB M-22-18 Blanket Software Self-Attestation | **Next Deadline:** Continuous (72-Hr Cyber Incident Reporting)

Desk Summary: Despite the July 2026 DoD policy pause on CMMC 2.0 Phase 2 C3PAO assessments, DFARS 252.204-7012 and its 110 NIST SP 800-171 controls remain fully live on every defense space subcontract.



Rule	Status	Date / Cadence	Instrument
DFARS 252.204-7012 (NIST 800-171)	LIVE	Continuous (72-hr incident report)	48 CFR 252.204-7012
CMMC 2.0 Phase 1 / Phase 2	PARTIAL	Ph. 1 Nov 10, 2025 / Ph. 2 Paused Jul 2026	32 CFR Part 170 / DFARS 7021
OMB M-22-18 Blanket Attestation	DEAD	Rescinded Jan 2026	EO 14306 / OMB M-26-05
CISA SBOM Guidance	LIVE	Active 2026 23-element spec	CISA 2026 SBOM

1. What Arrives on This Desk (Live Asks & Rules)

Defense and dual-use primes flow down DFARS 252.204-7012 and CMMC 2.0 (DFARS 252.204-7021) across Software & Mission Services and hardware suppliers. As Batch 5 DFARS 7012 analysis confirms, all 110 NIST SP 800-171 controls, SPRS scoring, and 72-hour cyber incident reporting are live today. For software deliverables, CISA 2026 23-element SBOM guidance remains active.

2. What Is Dead or Enjoined and Can Be Ignored

Do not use obsolete OMB M-22-18 blanket software self-attestation forms—EO 14306 (June 2025) and OMB Memorandum M-26-05 (January 2026) rescinded them. Also note that CMMC 2.0 Phase 2 C3PAO transition was paused by DoD policy in

July 2026 (marking CMMC PARTIAL), though Phase 1 self-assessment (effective Nov 10, 2025) and DFARS 7012 remain active.

3. What Carries a Date (Deadlines & Instruments)

Cyber and software compliance instruments:

Corpus References & Cross-Role Links

- Compliance Lead Desk Brief (Overview): https://bcesg.org/wa-space-role-compliance-lead-desk-brief/
- DFARS 7012 / NIST 800-171 (LIVE): https://bcesg.org/wa-space-rule-dfars-7012-nist-800-171-live/
- CMMC 2.0 Phase 2 Pause (PARTIAL): https://bcesg.org/wa-space-rule-cmmc-2-0-phase-2-partial/
- OMB M-22-18 Rescinded (DEAD): https://bcesg.org/wa-space-rule-omb-m22-18-attestation-dead/
- ITAR Cloud & FIPS 140 Carve-Out: https://bcesg.org/wa-space-ask-itar-cloud-fips-140-carveout/