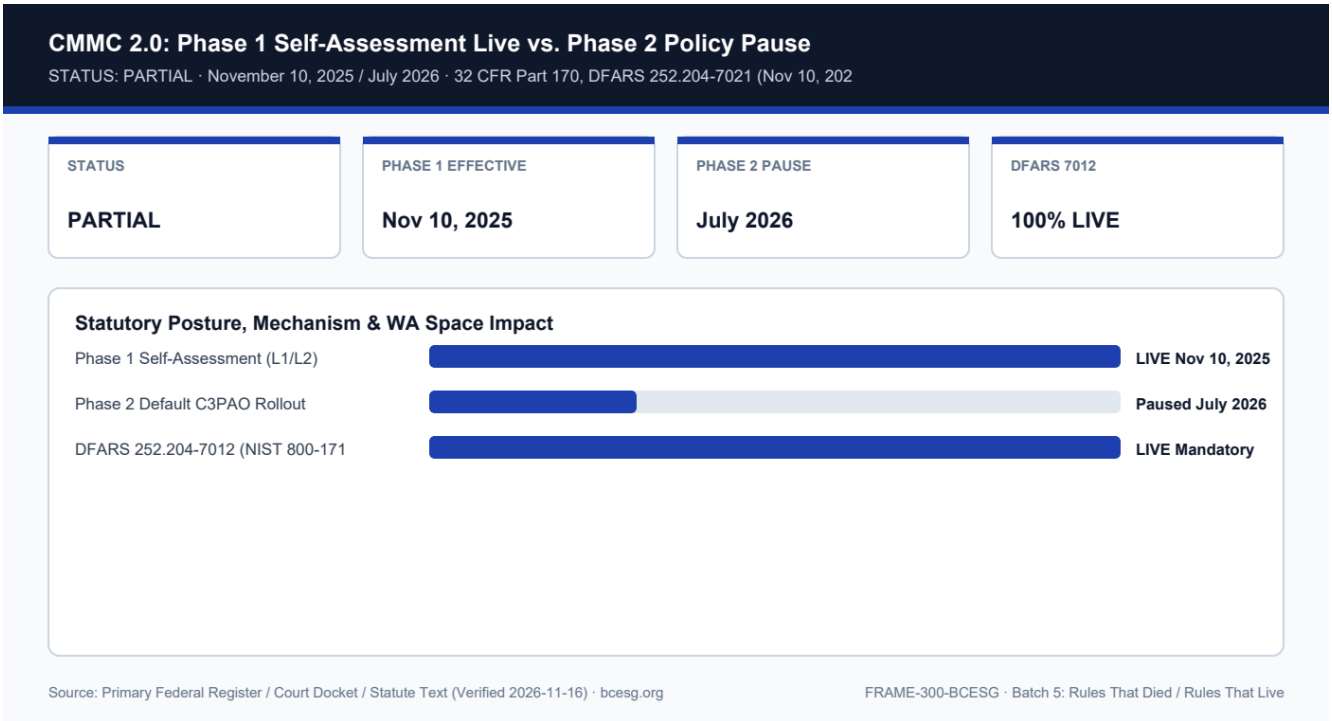
CMMC 2.0 (32 CFR Part 170 / DFARS 252.204-7021): PARTIAL — Phase 1 Live; Phase 2 C3PAO Transition Paused July 2026

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Rule: Cybersecurity Maturity Model Certification (CMMC) 2.0 (32 CFR Part 170 & 48 CFR 252.204-7021) | **Status:** PARTIAL | **Instrument:** 32 CFR Part 170, DFARS 252.204-7021 (Nov 10, 2025) & DoD July 2026 Phase 2 Pause | **Date:** November 10, 2025 / July 2026

Verdict & Proof: CMMC 2.0 is PARTIAL. Phase 1 self-assessment requirements took effect November 10, 2025 under DFARS 252.204-7021, but in July 2026 DoD instituted a policy pause on the Phase 2 mandatory C3PAO transition originally slated for November 10, 2026.



CMMC / DFARS Element	Effective / Action Date	Status (Nov 16, 2026)
32 CFR Part 170 & DFARS 252.204-7021	Dec 2024 / Nov 10, 2025	LIVE (Phase 1 Self-Assessment)
Phase 2 Default C3PAO Transition	Originally Nov 10, 2026	PAUSED (July 2026 DoD policy pause)
DFARS 252.204-7012 (NIST 800-171)	Active since 2017	LIVE — Mandatory for all CUI

Phased Posture: Phase 1 Active vs. July 2026 Phase 2 Pause

CMMC 2.0's program rule (32 CFR Part 170) took effect December 2024, and the DFARS acquisition rule (252.204-7021) took effect November 10, 2025, launching Phase 1 (Level 1 and Level 2 self-assessments in SPRS, plus selective C3PAO certifications at contracting-officer discretion).

In July 2026, DoD instituted a policy pause on transitioning to Phase 2 (originally scheduled to make third-party C3PAO certification the default on November 10, 2026) pending internal program review. The underlying CFR text remains on the books, and Phase 1 self-assessments plus selective C3PAO clauses remain active.

What WA Space Suppliers Owe Today

Every Washington space supplier handling Federal Contract Information (FCI) or Controlled Unclassified Information (CUI) must maintain current NIST SP 800-171 implementation and SPRS scores under DFARS 252.204-7012 and Phase 1, regardless of the Phase 2 C3PAO transition pause.

Verified Primary Sources & Internal Bridges

• eCFR Title 32 Part 170 (CMMC Program): https://www.ecfr.gov/current/title-32/subtitle-A/chapter-I/subchapter-G/part-170

• eCFR DFARS 252.204-7021: https://www.ecfr.gov/current/title-48/chapter-2/subchapter-H/part-252/subpart-252.2/section-252.204-7021