



When do we need to implement CMMC? Short answer is now!

Rule 32 CFR Part 170 established the CMMC program and Final Rule 48 makes CMMC a requirement for award of a contract.

Rule 32 CFR Part 170

This rule formally establishes the CMMC Program. It defines the overall policy, scope, and structure of how contractors and subcontractors must apply cybersecurity protections when they process, store, or transmit Federal Contract Information (FCI) and/or Controlled Unclassified Information (CUI).

Key features include:

- It sets the foundational requirement that contractor information systems handling FCI or CUI must meet specific cybersecurity standards.
- It codifies the levels of the CMMC certification (Levels 1, 2, 3 under CMMC 2.0) and how they map to different types of information and risk profiles.
- It outlines roles, assessment lifecycle, and the program's oversight structure (such as authorization of assessors).
- It is effective as of the date published (October 15, 2024) and took effect December 16 2024.

In short: 32 CFR Part 170 is the program rule — it defines what CMMC is, how it works, who it applies to, and what the certification levels involve.

Rule 48 CFR Parts 204/252 (DFARS) – Subpart 204.75

This rule deals with acquisition policy and enforcement — i.e., how the CMMC requirements are embedded into DoD contracts. It makes CMMC certification (or status) a condition for contract award and performance.

Key points include:

- Contracting officers must include in solicitations the CMMC level required for that contract (if any) and must not award a contract to a contractor that does not have the required CMMC status.



- It requires that the contractor maintain the required CMMC status throughout the life of the contract (including option years) for systems that process, store, or transmit FCI or CUI.
- It sets the timeline for when these contract requirements become enforceable. For example, the rule took effect for inclusion in solicitations and contracts from November 10 2025.

In summary: the 48 CFR (DFARS) rule is the contract rule — it turns the program requirements into binding obligations in DoD contracts and provides the mechanism by which compliance is enforced.

Key Deadlines

- The 32 CFR rule (Part 170) was published on October 15 2024 and became effective December 16 2024.
- The 48 CFR / DFARS Subpart 204.75 rule will anchor CMMC in contract awards (by requiring the certification/assessment to be a condition of award).
- According to multiple sources:
 - Phase 1 of roll-out began November 10 2025 (when new solicitations will start to require CMMC levels) for many contracts.
 - A broader requirement date: by October 31 2026, essentially all new DoD contracts involving FCI or CUI will list CMMC requirements.
- Certification validity: Once certified or assessed, CMMC status is valid for three years (for Level 2 & Level 3) from the CMMC status date.

TransVision offers CMMC compliance software, hardware, and documentation packages to reduce time and resources in certifying.

Contact us, cmmc@transvision.co.jp today to begin your journey to CMMC compliance and secure your position in the DoD supply chain.