FedRAMP Government Discussion

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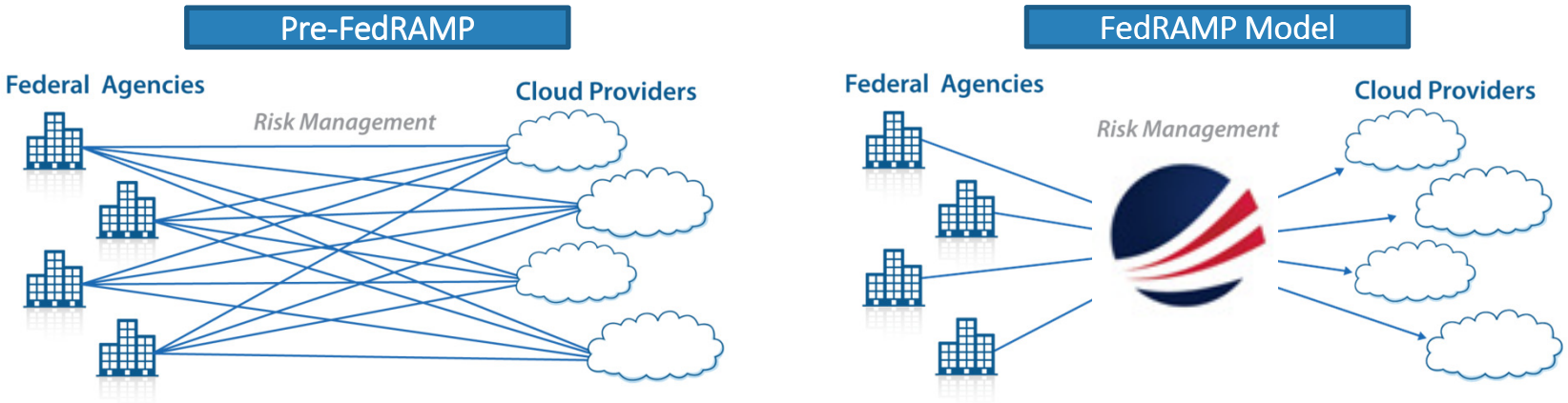
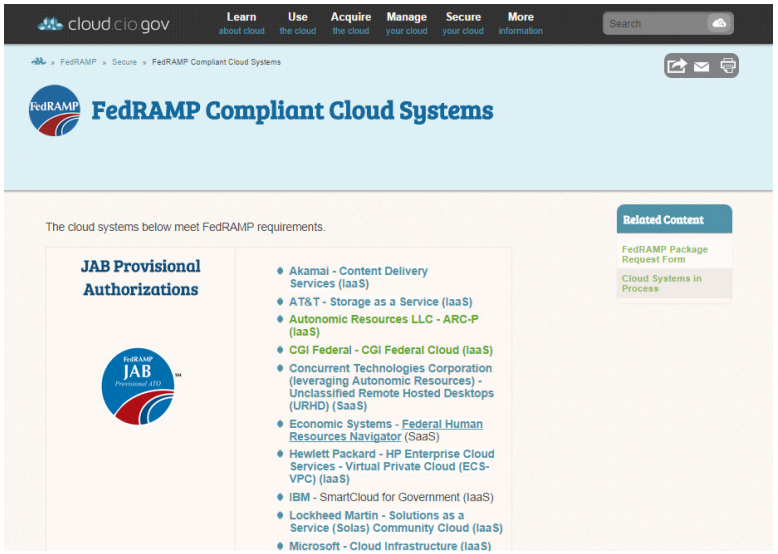
FedRAMP Overview
Ensuring Secure Cloud Computing

- FedRAMP was established via OMB Memo in December 2012.
- FedRAMP is the first government-wide security authorization program for FISMA – mandatory for all agencies and all cloud services
- FedRAMP's framework is being modeled in other government security programs (mobile, data) and by other countries (Canada, UK, EU, China)
- FedRAMP's focus is to ensure the rigorous security standards of FISMA are applied while introducing efficiencies to the process for cloud systems, key of which is re-use
- Conservative cost estimates for FedRAMP is $40M for the govt alone



FedRAMP Overview
Current Statistics



Authorizations

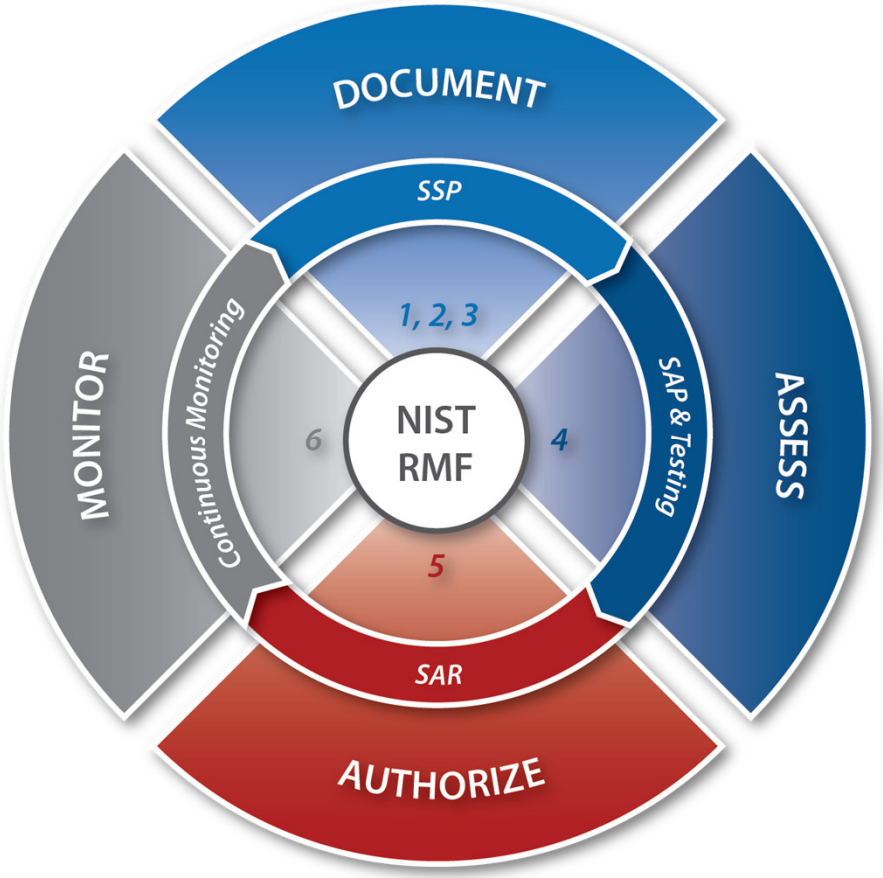
- JAB P-ATOs - 15
  - Includes services from IBM, Microsoft, Akamai, HP, Lockheed Martin
- Agency ATOs - 11
  - Includes Amazon, AINs, USDA, Micropact, Salesforce

In Process CSPs

- JAB P-ATO – 15
  - Includes services from Dell, SecureKey, Oracle, Amazon, Microsoft, IT-CNP, IBM
- Agency ATOs – 23
  - Includes Microsoft, Google, Adobe, IBM, Oracle, Verizon

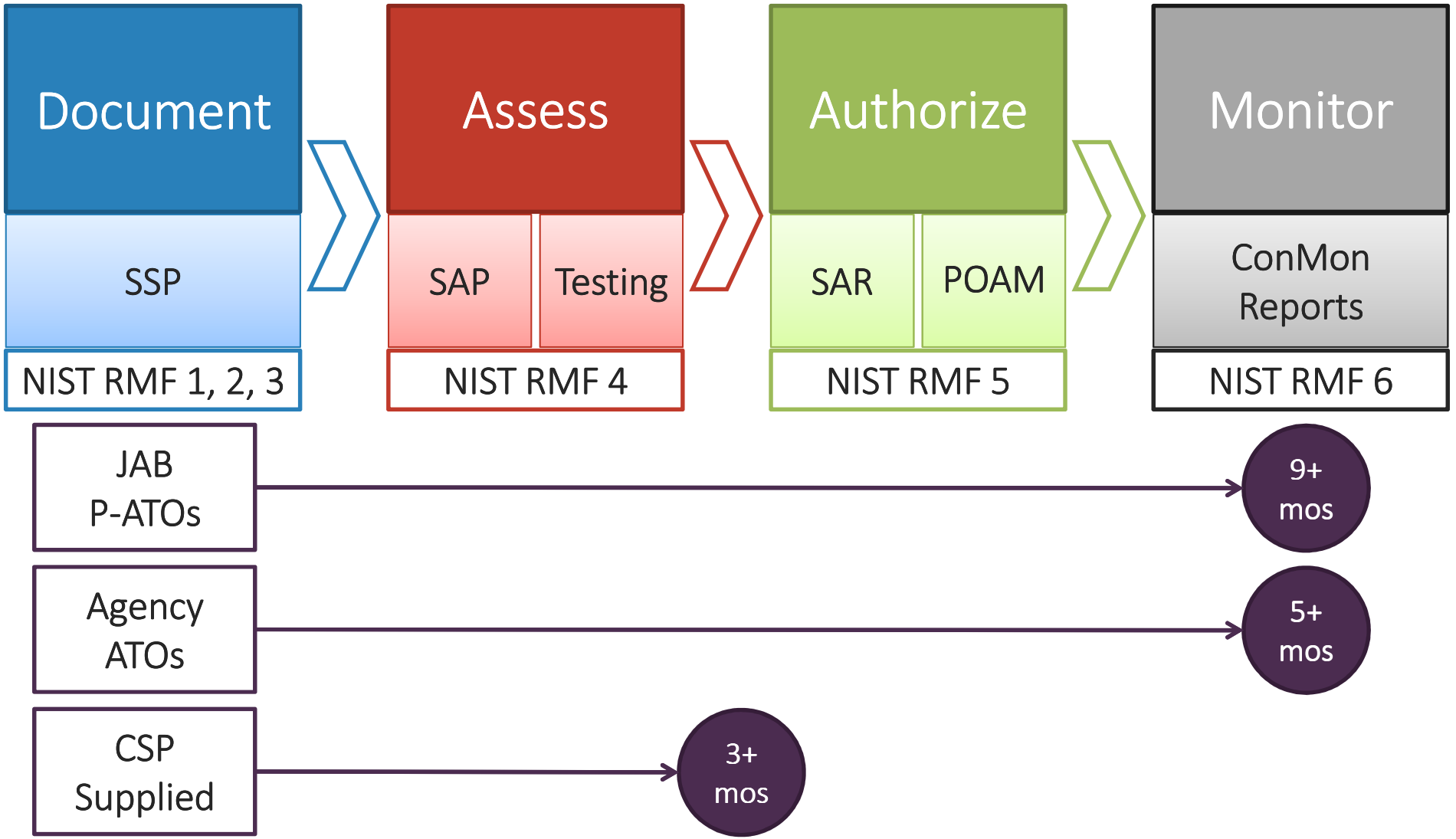
Agency ATO Quick Guide

Agency ATO Guide
FedRAMP Security Assessment Framework



- The agency ATO process should follow the FedRAMP Security Assessment Framework (SAF)
- The SAF is based on the NIST Risk Management Framework
- The FedRAMP Security Assessment Framework is a available at FedRAMP.gov on the Templates and Key Documents webpage

Agency ATO Guide
Timeline for the SAF



Agency ATO Guide
Considerations During SAF

TRUSTED INTERNATE CONNECTIONS (TIC)

- CSPs are required to support agency TIC implementations
  - CSPs do not host TIC components in their environments

FEDERAL INFORMATION PROCESSING STANDARD (FIPS) PUB 140-2

- CSPs are required to implement only FIPS Pub 140-2 for all cryptographic implementations
  - External interfaces with Federal customers

PERSONAL IDENTITY VERIFICATION (PIV)

- Agencies are required to use PIV for multi-factor authentication
  - CSPs are required to support PIV as a multi-factor solution

Agency ATO Guide
Document Checklist – Templates Available

- ATO Packages submitted to FedRAMP should have the following FedRAMP templates included. The PMO will check these documents for completeness

- FedRAMP Templates are available at FedRAMP.gov on the Templates and Key Documents webpage

- We suggest that you use the Test Cases that we released in Excel format for public comment: http://cloud.cio.gov/document/rev-4-test-case-workbook

FedRAMP Templates Available:

- FIPS 199
- Control Implementation Summary (CIS)
- System Security Plan
- Information System Security Policy
- User Guide
- E-Authentication Template
- Privacy Threshold Analysis (PTA) / Privacy Impact Analysis (PIA)
- Rules of Behavior (ROB)
- IT Contingency Plan
- Security Assessment Plan (SAP)
- Test Case Workbook
- Security Assessment Report (SAR)
- Plan of Action and Milestone (POA&M)
- ATO Letter
- Cert Letter

Agency ATO Guide
Document Checklist – Docs w/o Templates

- The Agency ATO Packages submitted to FedRAMP should have the following documents included. The PMO will check these documents for completeness

- The documents listed on this slide do not have an FedRAMP template

No Template Available:

- Policies and procedures
- Business Impact Analysis
- Configuration Management Plan
- Incident Response Plan
- Interconnection Security Agreement (ISA / MOU)
- Penetration Test Plan

GRANTING AN AUTHORITY TO OPERATE (ATO)

- Once a review is complete, an authorization should be granted and provided to the FedRAMP PMO
- Authorization for Cloud Providers should not be tied to individual Applications or Platforms
  - CSPs are intended for multiple tenants, use by different customers
  - Authorizations should be viewed as building blocks
- For Microsoft packages, consuming agencies will need to leverage all of the packages that relate to the service being consumed
  - e.g. GFS, Azure, O365
- Customer Agencies will ALWAYS have some responsibility for controls
  - e.g. an agency will always have to enforce 2 factor authentication

Agency ATO Guide
Sample ATO and Cert Letter Template

- Included with the authorization package should be a Certification Letter and ATO Memo detailing your agency's authorization.

- A sample Certification Letter is attached below:

Sample Cert Letter

- You can find the Sample FedRAMP ATO Memo Template at FedRAMP.gov on the Templates and Key Documents webpage