ISSA
Information Systems Security Association
ISSA-NOVA | Northern Virginia Chapter

Understanding What's What in the New FedRAMP World

August 21, 2025

FORTREUM

Agenda

- Introductions
- Historical Background
- FedRAMP Velocity by the Numbers
- FedRAMP 20x
- Rev 5 Authorization
- What's Coming?
- Questions

InfusionPoints
Securing Cloud Solutions

Introductions

FORTREUM

- Managing Partner at Fortreum, LLC (FedRAMP 3PAO; Trusted FedRAMP Advisor)
- Been in FedRAMP space since 2011
- Previous head of Veris Group's 3PAO practice (#1 most used 3PAO) prior to acquisition by Coalfire Systems; After acquisition, ran Coalfire's 3PAO assessment and advisory practice prior to forming Fortreum

- Cofounder and COO, InfusionPoints, LLC (FedRAMP Acceleration Solutions; Trusted Advisor; FedRAMP Cloud Service Provider)
- FedRAMP OG since 2011; among first to achieve FedRAMP 20x Low
- Lead team that has advised / accelerated dozens of FedRAMP and DoD authorizations; Dell, VMware, Cisco, RSA, OpenText, Snyk

InfusionPoints
Securing Cloud Solutions

Historical Background

FORTREUM

- Established via OMB Memo in 2011; made law in 2022 as part of FedRAMP Authorization Act; 20x released in 2025
- Means to introduce cloud service offerings (IaaS, PaaS, SaaS) into the Government via a comprehensive assessment/authorization process (i.e., FISMA enhanced for Cloud)
- Cloud Service Providers + Authorizing Officials + 3PAOs
- Aligned to NIST 800-53 (started at Rev 3; now Rev 5)
- Pros: Comprehensive review by independent auditor; Ongoing validation; Re-assurance that key requirements met/maintained
- Cons: Time intensive (18+ months); Costly (build, prep, assessment = $$$); Need Agency Sponsor

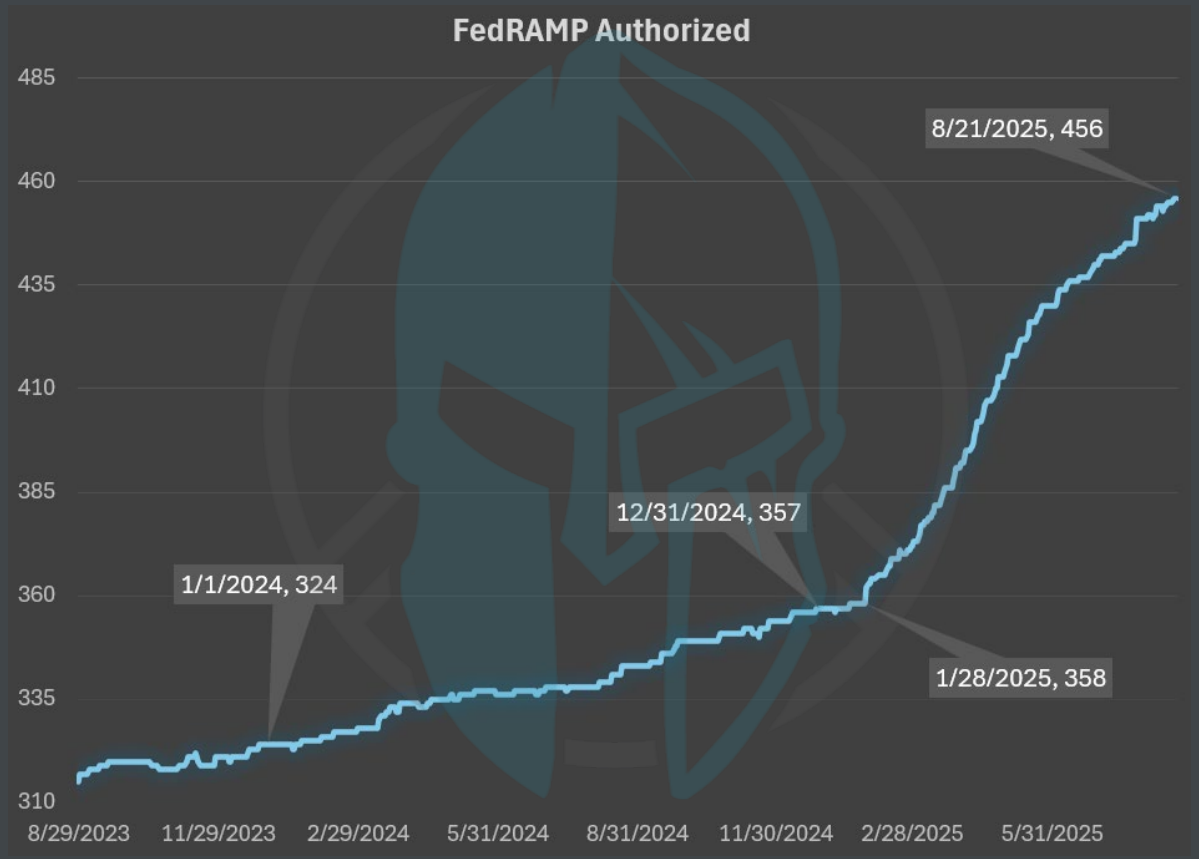
FedRAMP

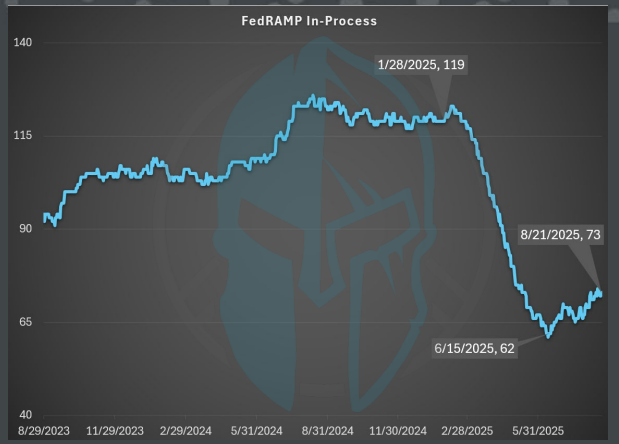
Total FedRAMP Authorized Services **456**

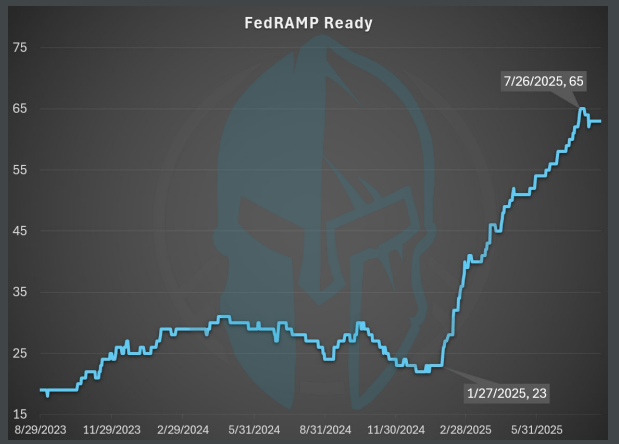
InfusionPoints
Securing Cloud Solutions

FedRAMP Velocity by the Numbers

FORTREUM







FedRAMP 20x

FORTREUM

- A new authorization path, re-imagined from the ground up to allow for *20x* the number of yearly authorizations. Encourage innovative services to enter the market by reducing time to authorization and overall cost.

- Automation over documentation – automated validations for 80% of requirements without the need to write control narratives. Heavy reliance on public / private partnership to build standards and solutions.

- Leverage existing industry investments in security by allowing some inheritance of other commercial security frameworks.

- Favor continuous monitoring of key security indicators (KSIs) over point-in-time audits. Shifts audit focus to auditing the validations to determine sufficiency and coverage.

- Unlock innovation by reducing red-tape – Leverage consistent guidelines without ghost regulations. Reduce the burden of significant changes when following established processes.

InfusionPoints
Securing Cloud Solutions

Rev 5 Authorization

FORTREUM

- Traditional and only path to FedRAMP Authorization right now
- Requires a sponsoring Agency who will sign off on the package in the end
- Testing includes a manual control assessment, vulnerability scans, penetration test and red team exercise (Mod/High baseline only)
- Build environment; develop documentation (SSP is main document); engage 3PAO to do the testing; 3PAO documents results in a SAR; package presented to Agency for authorization determination
- DoD has their own overlays called impact levels that are derived from the DoD Security Requirements Guide
- Results widely accepted across Agencies to allow for reciprocity/acceptance from one Agency to another
- Once authorized, enter Continuous Monitoring phase to maintain

InfusionPoints
Securing Cloud Solutions

What's Coming?

FORTREUM

- September – 20x Low finalized, Agency Adoption Pilot, FIPS guidance, POA&M Standard, Continuous Validation Standard
- October – 20x Moderate Pilot, Collaborative ConMon Standard, Agency Reuse Playbook
- Agency Path (rev5) Balance Improvements – Significant Change Notifications, DISA ILx Reciprocity, Authorization Data Sharing Standard, Minimum Assessment Standard, ConMon Standard, Continuous Vuln Management Standard
- 20x Phase Three will likely launch in January 2026

Questions?

Michael Carter; mcarter@fortreum.com
Jason Shropshire; Jason.Shropshire@infusionpoints.com