

December 15, 2017

Matt Goodrich
Director, Federal Risk and Authorization Management Program (FedRAMP)
Technology Transformation Service (TTS)
General Services Administration (GSA)
1800 F Street NW
Washington, DC 20006

Dear Mr. Goodrich:

On behalf of our more than 400 member companies, the Professional Services Council (PSC) respectfully submits this response to the General Services Administration (GSA) Federal Risk and Authorization Management Program (FedRAMP) Office's November 13, 2017 "Acquisitions RFI."

PSC is the voice of the government technology and professional services industry. PSC's member companies represent small, medium, and large businesses that provide federal agencies and the military with services of all kinds, including information technology (IT) and cloud computing services.

PSC appreciates GSA's efforts to help agencies adopt secure cloud technologies by identifying appropriate acquisition contract language for cloud services and for meeting FedRAMP requirements. We have engaged our members and expect to have additional input with specific contract language examples at a later time. We hope to continue to work with the FedRAMP office as you develop additional guidelines for agencies.

PSC also reiterates its policy recommendations for ensuring greater reciprocal treatment by agencies of cloud service providers' (CSPs) authorizations as originally envisioned by FedRAMP's "do once, use many times" approach. OMB should require agencies to rely on Authorizations to Operate (ATOs) and provisional authorizations from other agencies or the Joint Authorization Board. This would help accelerate cloud adoption and encourage more CSPs to compete for federal contracts. When such reciprocity – through proper, risk-based leveraging of an ATO – is not granted, agencies should report and explain to OMB and to the FedRAMP Program Management Office why such reciprocity is not appropriate.

Agencies should also consider other, more agile methods of authorization such as an initial certification and assessment that is augmented with active monitoring. Federal CIOs and IT leaders interviewed as part of PSC's annual Federal CIO Survey (available at www.pscouncil.org/c/p/CIO_Survey/CIO_Survey.aspx) expressed frustration with burdensome

certification requirements for cloud-based solutions that house only low-risk data. PSC's 2015 publication "Best Practices for Federal Agency Adoption of Commercial Cloud Solutions" (available at www.pscouncil.org/Downloads/documents/PSC-Cloud-WEB%20-%2012-10-15.pdf) includes additional recommendations and guidance for agencies.

Should you have any questions, please feel free to contact me at cummins@pscouncil.org or Alan Chvotkin, PSC Executive Vice President and Counsel, at chvotkin@pscouncil.org. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Cummins". The signature is fluid and cursive, with the first name "Kevin" and last name "Cummins" clearly distinguishable.

Kevin Cummins
Vice President, Technology