

JAB PRIORITIZATION CRITERIA AND FEDRAMP CONNECT GUIDANCE

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FedRAMP



DOCUMENT REVISION HISTORY

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03/26/2020	3.0	All	Updated and added additional information to sections 2.1, 2.2, 3.2.1, and 4.1 to provide additional clarity for CSPs one how to best participate in the FedRAMP Connect process	FedRAMP PMO



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I. GUIDANCE ON THE JAB PRIORITIZATION PROCESS

The FedRAMP invests heavily in creating a broad marketplace of Cloud Service Offerings (CSOs) to help meet government-wide mission needs. However, as a statically funded PMO we have limited resources to conduct Joint Authorization Board (JAB) authorizations and rely on agencies (currently almost 70% of approved CSOs) to provide a scalable way to balance additional demand.

Based on current program resourcing and funding levels, FedRAMP may prioritize up to 12 CSOs per year. FedRAMP Connect is the process FedRAMP uses to evaluate CSOs and prioritize to work towards a JAB Provisional Authorization to Operate (P-ATO).

In order to select the most impactful CSOs for a JAB authorization, FedRAMP worked with the JAB, OMB, and the CIO Council to create criteria in order to fairly and consistently select CSOs to prioritize for JAB P-ATOs. Cloud Service Providers (CSPs) interested in working with the JAB are required to submit a “Business Case” to info@fedramp.gov comprised of a simple PDF form and Excel worksheet gathering demand information for their CSO. This “Business Case” submission provides a normalized view for comparison of CSOs and allows for consistent and fair reviews.

The most important criteria for JAB prioritization is to demonstrate government-wide demand for the CSO. Second, CSOs who are FedRAMP Ready have preference in prioritization. Finally, the preferred characteristics exist to consider a clear prioritization of CSOs outside of demand and FedRAMP Ready status.

All prioritized CSOs must achieve the FedRAMP Ready designation within 60 days of being selected and complete and submit the security authorization package, to include the full 3PAO assessment, to the FedRAMP PMO within 90 days.

FedRAMP will share “Business Case” due dates on the FedRAMP.gov [JAB Authorization webpage](#) and through the *Focus on FedRAMP* [blog](#). CSPs are welcome to submit a “Business Case” at any time for the next review cycle. Before a CSP begins to pursue JAB prioritization and complete their “Business Case,” FedRAMP encourages CSPs to review this document in its entirety. Please contact info@fedramp.gov if you have any questions on the process or would like to have a one-on-one coaching call with FedRAMP prior to submission of your “Business Case.”

2. JAB PRIORITIZATION CRITERIA

The prioritization criteria provide the benchmarks and characteristics to evaluate and choose CSPs to work with toward a JAB P-ATO. The prioritization criteria consist of three categories: Demand, FedRAMP Ready, and Preferred Characteristics.



2.1. Demand for CSP Product

Demand is the primary criteria for prioritization and requires a CSP to provide verification of current or potential demand from the equivalent of six (6) customers. There are multiple ways for a CSP to prove demand for their CSO; however, CSPs are not expected to meet all demand categories. The established demand categories ensure that the CSPs' product will be broadly used by a critical mass of government agencies. CSPs must have a minimum of six (6) unique federal agency customers with authorizations that leverage the system's JAB P-ATO.

DEMAND CATEGORY	MEASURE OF DEMAND
Current Agency Use	Identify existing unique federal agency customers
Indirect Demand	Provide evidence of FedRAMP authorized cloud services that use the service and the number of FedRAMP ATOs issued for that FedRAMP CSO
Potential Agency Use	Provide justification for projected adoption within 12 months of ATO; examples of how a CSP could provide justification include (but are not limited to): <ul style="list-style-type: none"> ▪ Federal customers using your on-premise or commercial version that are interested in moving to your CSO or government version ▪ Government RFIs, RFQs, RFPs, and pending awards ▪ Business capture plan provided by CSP grounded by agency needs and spend ▪ Use by State, Local, Tribal, or Territorial Governments ▪ Use by Federally Funded Research Centers (FFRDCs) and Labs
OMB Policy / Priorities / Shared Services	Defined by administrative priorities for cross-agency services; examples of OMB Policy, Priorities, and Shared Services could include (but are not limited to): <ul style="list-style-type: none"> ▪ Alignment with national strategy and policies ▪ CSP provides a new solution to existing federal requirements (such as CDM or HSPD-12) ▪ CSP provides a solution for existing federal mandates where there are large areas of agency deficiencies
Agency-Defined Demand	Annual CIO Council Survey or Agency Advisory Group selected by CIO Council
	Official requests by agencies to the FedRAMP Program Management Office (PMO)

2.2. FedRAMP Ready

The FedRAMP Ready designation indicates that a 3PAO attests to the readiness of a CSP's cloud offering for the authorization process and authors a Readiness Assessment Report (RAR) that the FedRAMP PMO then reviews and approves. The RAR documents the CSP's capability to meet FedRAMP security requirements. *Although FedRAMP Ready is not required to submit a "Business Case," it is a heavily*



weighted criterion in the prioritization process. CSPs may be selected to work with the JAB without being FedRAMP Ready, but a CSP must achieve FedRAMP Ready within 60 days of selection or the CSP will automatically be deprioritized.

2.3. Preferred Characteristics

These criteria are not mandatory for prioritization but are preferred characteristics by the JAB for government-wide solutions and used for evaluation when the demand and FedRAMP Ready criteria do not provide a clear prioritization decision.

The preferred characteristics were chosen because solutions with these criteria meet at least one of the following factors:

1. Designed for the Federal Government
2. Demonstrate a proven track record of managed risk and secure implementations
3. Provide heightened security, presenting less risk for federal information
4. Meet Federal Government needs

PREFERENCES	RATIONALE
Government Only Cloud	Demonstrates that the CSP has a cloud environment designed specifically to meet government requirements and government-only presents less risk to government customers
Other Certifications (SOC2, ISO27001, PCI)	Demonstrates security assessments of the CSP in other compliance regimes proving a track record of security compliance
High Impact > Moderate Impact > Low Impact	Demonstrates high impact solutions have the greatest return on investment for security and cost for IT modernization across the government
New and Innovative with Demonstrable ROI for Government	Demonstrates that the CSP product meets the mission needs of government agencies <ul style="list-style-type: none">▪ The JAB defines ROI as reducing risk, saving cost, and/or addressing political considerations
Proven Maturity (CMMI Level 3+, ISO Organizational Certifications)	Demonstrates that the CSP has a proven track record of mature organizational processes that increases the likelihood that the CSP will be able to maintain an acceptable risk posture
Prior Experience with Federal Security Authorizations (e.g. use of a 3PAO in “consulting” capacity, other systems owned by the CSP with existing FISMA ATOs)	Demonstrates that the CSP has resources experienced with FISMA and FedRAMP, which increases the CSPs likelihood of success



PREFERENCES	RATIONALE
Dependencies from other cloud service offerings (e.g. IaaS that hosts other SaaS solutions with demand from the Government)	Demonstrates that the CSP product will provide an underlying service that other CSP products can leverage that meets the needs of the government

3. THE FEDRAMP “BUSINESS CASE”:

There are two components associated with the FedRAMP Connect Business Case. CSPs will need to submit the 1) *FedRAMP “Business Case” for JAB Prioritization Information Form* and 2) *Proof of Demand Worksheet*. CSPs also have the option of submitting a collection of written proof of potential demand (i.e. demand verification letters or communications).

3.1. JAB Prioritization Information Form

CSPs will need to fill out a “FedRAMP Business Case for JAB Prioritization” form. The form consists of multiple choice and short answer questions.

The “Business Case” form also requires CSPs to provide a brief service description. This description should provide evaluators with an understanding of the value of the CSO to the Federal Government. Questions this write-up should address include:

How does an agency use and experience your offering?

- You should think about the customer journey of using your system - think of an agency employee logging into your system and achieving some action or helping them deliver on their agency’s mission.

How is your CSO broadly applicable across the Federal Government?

- For example, how could agencies with vastly different missions all use your service; from National Institutes of Health to the Department of Energy to Census?

Does your CSO provide a new and innovative service?

- This doesn’t mean simply modernizing but creating a new ability that an agency or customer does not have currently.

Why should the JAB authorize your service over similar offerings?

- What makes your service offering have enough demand to be considered a truly government-wide offering?



3.2. Proof of Demand Worksheet

In order to accurately evaluate demand, FedRAMP developed an Excel worksheet for CSPs to complete in order to show proof of current federal customers; indirect customers; State, Local, and Tribal customers; and potential demand via responses to federal agencies' RFIs, RFPs, and RFQs. The information requested in each column should be provided to the best ability of the CSP and any deviations from the template need approval from the PMO prior to submission. FedRAMP may contact any of the points of contact that are provided by the CSP to validate demand.

It is important to note that demand is not double-counted when reviewing a CSO's demand worksheet, i.e., if you have a current federal customer *and* you have responded to an RFP from that same agency, that customer would *only* be counted under the "Current Federal Customer" category. Similarly, if a CSP responded to two RFPs from the same agency, this would only be counted once.

3.2.1. Current Federal Customers

In order to gather information on which federal agencies are currently using a CSP's cloud offering, FedRAMP developed an Excel worksheet for CSPs to complete in order to show proof of current demand. Only count existing federal customers using the cloud product that is within scope of the FedRAMP Connect "Business Case" in this section. CSPs may only list each unique agency customer once, even if there are multiple contracts associated with the same agency. As a rule of thumb, please use the following agency list, provided by the Federal Register to determine what equates to an agency: <https://www.federalregister.gov/agencies>

Example: The Centers for Medicare & Medicaid Services (CMS) and the Center for Disease Control & Prevention (CDC) count as two unique customers although both are within the Department of Health and Human Services (HHS). However, multiple contracts within CMS count as one.

Information gathered in this worksheet includes:

- Federal Customer Name (i.e., Health and Human Service)
- Customer Point of Contact Information
- Government Contract Number
- Period of Performance
- ATO status

3.2.2. Indirect Customers

In order to accurately evaluate demand from indirect customers, FedRAMP requires information on which FedRAMP authorized cloud services use your service (i.e., external services). FedRAMP developed an Excel worksheet for CSPs to complete in order to show proof of indirect demand. Information gathered in this worksheet includes:

- Name of the FedRAMP-Authorized CSP Customer Using Your Service



- Point of Contact Information for the FedRAMP CSO
- FedRAMP Package ID Number for FedRAMP CSO
- Number of FedRAMP ATOs Issued for the FedRAMP CSO

The above information is used to validate demand via the referenced CSOs' System Architecture Diagrams. This list should *not* include resellers.

3.2.3. Current State, Local, Tribal, Territorial, Federally Funded Research Centers, or Lab Customers

As part of evaluating potential demand, FedRAMP requires information of which non-Federal Government bodies are using your service. If your CSO has current customers in the above categories, this is considered proof of potential demand in the Federal Government. CSPs with these customers may complete this worksheet to provide the following information:

- Customer Name (i.e., Maryland Department of Transportation)
- Customer Point of Contact Information
- Contract Number
- Period of Performance

3.2.4. Federal Agencies' RFIs, RFPs, and RFQs

An additional way of showing proof of potential demand from the Federal Government is to provide information on which federal agencies have issued an RFI, RFP, or RFQ in the last 18 months that relates to your CSO. CSPs that have responded to any of these requests may complete this worksheet and provide the following information:

- Federal Agency Name
- Name of RFI, RFP, or RFQ
- RFI, RFP, or RFQ Number
- Contract Point of Contact
- Submission Date

FedRAMP reserves the right to request a copy of the RFI, RFP, or RFQ submission for validation purposes.

3.3. Potential Demand Validation Letters/Communications (Optional)

CSPs also have the option of providing a single PDF of letters/communications that provide proof of potential demand from *new or current federal customers interested in moving to the cloud version*. FedRAMP developed sample demand verification letters for CSPs to use (see Appendix A), but any communication showing proof of demand will be reviewed. CSPs and agencies should note that a



demand verification letter or communication from an agency representative expressing interest in a CSO does not indicate a commitment to procure the CSP’s service, but it does verify that the agency is potentially interested in the cloud offering being proposed for a JAB P-ATO.

FedRAMP defines these potential customers as follows:

- 1. Federal agencies that are actively interested in using your CSO:** This includes federal agencies that have continuously been in contact with you about using your CSO and/or are currently piloting or doing a trial run of your product. This does not include agencies you have only cold-called or met at a conference.
- 2. Proof of interest from current federal agency customers using an on-premise version or commercial version of the CSO you are proposing for authorization by the JAB:** If you have an on-premise version or commercial version of the CSO you are proposing for a JAB P-ATO, a federal agency representative can provide a letter or communication expressing their interest in moving to the cloud version of the offering you are proposing.

This optional component of the “Business Case” should be consolidated into one PDF and submitted with the other elements of the “Business Case.” However, if your customer point of contact would prefer to email the PMO directly, they are welcome to directly submit their proof of demand to info@fedramp.gov with the subject line: Demand Verification for [CSO].

4. “BUSINESS CASE” EVALUATION METHODOLOGY

4.1. Evaluation of the Criteria

FedRAMP’s initial review of CSOs is based on demand. CSOs pass the demand review are then evaluated based on their FedRAMP Ready status. The relative value of the criteria is: demand from current federal customers is more valuable than demand from non-federal customers and potential customers; demand is more important than a CSO being FedRAMP Ready. When “Business Cases” are evaluated and considered equal in demand, then FedRAMP Ready status becomes a deciding factor. If demand and FedRAMP Ready status are considered equal, the JAB Preferred Characteristics detailed in [section 2.3](#) will be considered in selecting the successful CSOs.

4.2. Demand Scoring Rubric

Below are the relative values for each validated proof of demand a CSP can provide:

- Current Demand = 1
- Indirect Demand = .5
- Potential Demand = .25



In order for a CSP to pass the demand criteria for prioritization, a CSP must provide verification of current, indirect, and/or potential demand from the equivalent of six customers.



APPENDIX A EXAMPLE DEMAND VERIFICATION LETTERS

Example Demand Verification Letter for the FedRAMP JAB P-ATO Prioritization Process

Current On-Premise or Commercial Customers

Current customers of [Cloud Service Provider's (CSP) Name] must complete this letter in order to provide proof of current use for their on-premise or commercial cloud service, [Service Offering Name], and express interest in potentially moving to [CSP Name] cloud service, [Cloud Service Offering (CSO) Name] if they were to receive a JAB P-ATO.

Customer Point of Contact Information:

Agency: _____

Agency Representative Name: _____

Title: _____

E-mail: _____

Telephone: _____

Dear FedRAMP PMO and JAB,

[Name of Customer Organization] is currently using [CSP's Name] [on premise or commercial] service, [Service Offering Name]. We have been using [Service Offering Name] for [Period of Performance] and plan to continue using this service until [Date]. If [CSP's Name] was to receive a JAB P-ATO from FedRAMP for the [cloud or government-only] version of the offering we are currently using, we would be interested in moving to this new CSO.

I understand that this letter **does not** bind my organization in any way to move to [CSP's Name] cloud or government-only offering and is merely a demonstration of active interest in [CSP's Name] cloud service offering and a potential move if it was to receive a JAB P-ATO.

Best,

Signature

Date



Example Demand Verification Letter for the FedRAMP JAB P-ATO Prioritization Process

Potential Cloud Customers

Potential customers of [Cloud Service Provider’s (CSP) Name] must complete this letter to provide proof of potential demand for their Cloud Service Offering (CSO), [CSO Name]. Federal agencies that have been in contact with the CSP about using their CSO and/or are currently piloting or doing a trial run of the product should complete this letter.

Customer Point of Contact Information:

Agency: _____

Agency Representative Name: _____

Title: _____

E-mail: _____

Telephone: _____

Dear FedRAMP PMO and JAB,

[Name of Federal Government Agency] is actively interested in using [CSP’s Name] CSO, [CSO Name] and would consider procuring their services if the CSO was to obtain a JAB P-ATO.

[Insert content that details your current communications or work with CSP.]

I understand that this letter **does not** bind my organization in any way to procure [CSP’s Name] CSO and is merely a demonstration of active interest in [CSP’s Name] service and a potential procurement if the CSO was to receive a JAB P-ATO.

Best,

Signature

Date