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Framework / Cloud Security / FedRAMP

FedRAMP Rev. 5 – Moderate Baseline

The FedRAMP Rev5 Moderate baseline is the set of 323 NIST SP 800-53 Rev. 5 controls a cloud service must implement and have assessed for moderate-impact federal data.



What it is

The FedRAMP Rev5 Moderate baseline is the set of 323 NIST SP 800-53 Revision 5 controls (181 base controls and 142 enhancements across 18 families) that a cloud service offering must implement and have independently assessed before U.S. federal agencies may use it for information whose loss would have a serious adverse effect on operations, assets or individuals. It has applied to Moderate authorizations since the Rev5 baselines were released on May 30, 2023, and nearly 80 percent of the services that receive FedRAMP certification sit at this level.

At a glance

PUBLISHER
FedRAMP Program Management Office, General Services Administration (GSA); governed by the FedRAMP Board

TYPE
Certification / Assurance Program

VERSION
Rev5 Moderate baseline (323 controls, NIST SP 800-53 Rev. 5); Class C under the Consolidated Rules for 2026

EFFECTIVE
May 30, 2023 (Rev5 baselines); 2026 rules enforced from January 1, 2027

DOMAIN
Cloud Security

FAMILY
FedRAMP

REGION
United States

INDUSTRY
Government & Public Sector

ADOPTION MODEL
Regulatory Compliance

IMPLEMENTATION COMPLEXITY
High

Source: fedramp.gov/2026/providers/rev5/controls/

Why it matters

- **A defined threshold** FIPS 199 Moderate means a loss of confidentiality, integrity or availability would cause a serious adverse effect, such as significant operational damage, financial loss or individual harm short of loss of life.
- **323 named controls** The baseline lists 181 base controls and 142 enhancements, from AC-1 to SR-12, so scope is settled before an assessment begins.
- **Parameters written down** FedRAMP-defined assignments such as the quarterly privileged-account review in AC-2(j) remove guesswork at Moderate; the 2026 rules replace most of them with provider-set values recorded in the Security Decision Record.
- **The largest market** Nearly 80 percent of certified services are Moderate, so most agency reuse under 44 U.S.C. 3613 happens with this baseline.

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How SmartSuite supports FedRAMP Rev. 5 Moderate

Moderate Control Set by Family

Hold the 181 base controls and 142 enhancements with the FedRAMP parameter, the continuous monitoring periodicity and the responsible owner for each.

Organization-Defined Values

Record the value chosen for each parameter the 2026 rules hand back to the provider, with the rationale and approver, as the Security Decision Record requires.

Readiness and Assessment Workflow

Track the Readiness Assessment Report, SAP, control tests and SAR findings through remediation to closure before the agency ATO.

Monthly Deliverables

Schedule the inventory, POA&M and scan report uploads due each month and the controls selected for the annual assessment worksheet.

Significant Change Notifications

Classify proposed changes by the 2026 categories and route the notification, evidence and agency approval through one workflow.

Agency Reuse Register

List each agency ATO or authority to use, its date and the copy sent to GSA, so reuse under 44 U.S.C. 3613 is visible in one place.

Common framework mappings

CIS Controls v8.1 · COBIT 2019 · GDPR · HIPAA · ISO 27001:2022 · ISO 27017 · ISO 27018 · NIST CSF 2.0 · NIST 800-53 Rev.5 · PCI DSS 4.0.1

Official resources

FedRAMP Moderate Impact Baseline

Defines security controls and requirements for cloud systems classified as moderate impact.

fedramp.gov/legacy/assets/LEGACY%20FedRAMP_Security_Controls_Baseline.xlsx

FedRAMP Security Assessment Framework

Defines the FedRAMP process for assessing and authorizing cloud services.

fedramp.gov/legacy/playbook/csp/authorization/what

FedRAMP Authorization Process Guide

Provides a comprehensive outline of the FedRAMP authorization process for cloud service providers.

fedramp.gov/legacy/playbook/csp/authorization/getting-started

FedRAMP Program Overview

Outlines the Federal Risk and Authorization Management Program and its objectives.

fedramp.gov

Frequently asked questions

How many controls are in the FedRAMP Moderate baseline?

323. The FedRAMP Security Controls Baseline lists 181 base controls and 142 control enhancements from NIST SP 800-53 Rev. 5 across 18 families, compared with 156 for Low and 410 for High. Each row carries the FedRAMP-defined parameter, any additional FedRAMP requirement and the continuous monitoring periodicity.

What counts as Moderate impact?

Under FIPS 199, a system is Moderate when a loss of confidentiality, integrity or availability would have a serious adverse effect on an agency's operations, assets or individuals, for example significant operational damage, financial loss or individual harm short of loss of life. The provider records this categorization in the SSP.

What is changing for Moderate providers under the Consolidated Rules for 2026?

Moderate becomes Class C. Notice NTC-0013 of June 16, 2026 removes most FedRAMP-assigned parameter values and FedRAMP-specific control guidance, so providers set organization-defined values in a Security Decision Record, and the SSP is replaced by a Certification Package Overview. Existing offerings adopt the changes at their first independent assessment completed after January 1, 2027.

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Does a Moderate authorization need an agency sponsor?

Under Rev5, generally yes: Class C Agency Certification requires a federal agency to authorize the service first. Two temporary Rev5 Program pipelines (Lost Sponsor and Ready Conversion) opened on August 10, 2026 for eligible Class B and C providers, and all new Rev5 applications close on June 11, 2027. FedRAMP 20x Class C needs no agency sponsor.

What ongoing work does the Moderate baseline require?

Monthly uploads of the inventory and POA&M (CM-8) and vulnerability scan reports (RA-5) to the FedRAMP secure repository, incident and significant change notifications, and an independent assessment at least annually (CA-2). The 2026 Vulnerability Detection and Response ruleset extends detection well beyond monthly scanning.

License included / downloadable: Yes The FedRAMP Security Controls Baseline spreadsheet and the Rev5 rules are U.S. government works published free of charge on fedramp.gov.

Full framework page and mappings: smartsuite.com/frameworks/fedramp-rev-5-moderate-impact-baseline