SmartSuite

Framework / Cloud Security / FedRAMP

FedRAMP Rev. 5 – Low / Moderate / High

FedRAMP Rev5 is the legacy FedRAMP certification type: NIST SP 800-53 Rev. 5 baselines, 3PAO assessment and agency authorization for cloud services used by U.S. agencies.



What it is

FedRAMP Rev5 is the legacy FedRAMP certification type: the NIST SP 800-53 Revision 5 control baselines (Low 156 controls, Moderate 323, High 410, plus the Tailored LI-SaaS variant) and the documented, agency-sponsored assessment process that a cloud service offering must pass before U.S. federal agencies may use it for federal information. It has applied to every provider seeking a FedRAMP authorization since the Rev5 baselines were released on May 30, 2023. Under the Consolidated Rules for 2026 it is being replaced by FedRAMP 20x: FedRAMP stops accepting new Rev5 applications on June 11, 2027, and existing Rev5 certifications stay active until at least December 31, 2028.

At a glance

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

TYPE
Certification / Assurance Program

VERSION
Rev5 (May 2023 baselines)

EFFECTIVE
May 30, 2023

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/

Why it matters

- **One package, reused government-wide** Section 3613 of title 44 creates a presumption that a FedRAMP authorization package is adequate for an agency's own authorization to operate, so an agency reuses the assessment instead of commissioning a new one.
- **Baselines fixed by impact level** The Rev5 Security Controls Baseline sets 156 controls for Low, 323 for Moderate and 410 for High across 18 NIST SP 800-53 families, with FedRAMP-defined parameters such as a quarterly review of privileged accounts at Moderate (AC-2(j)).

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How SmartSuite supports FedRAMP Rev. 5

Baseline Control Library

Load the 156, 323 or 410 Rev5 controls by NIST family with the FedRAMP parameter, the implementation statement and the inherited or customer-responsibility flag for each.

Security Decision Record

Log each organization-defined parameter and risk decision with its rationale, approver and date, the record the 2026 rules require in place of FedRAMP-set values.

Findings and Accepted Weaknesses

Track 3PAO findings, deviation requests and remediation to closure, and report the open list that replaces the POA&M under the Consolidated Rules.

Monthly Deliverables Calendar

Schedule the inventory update (CM-8), vulnerability scan reports (RA-5) and POA&M upload due each month and record when each agency reviewed them.

Significant Change and Incident Log

Route significant change notifications and incident communications to the agency authorizing officials with the evidence and approvals attached.

ATO and Assessment Evidence

Keep the SSP or Certification Package Overview, SAP, SAR, each agency ATO letter and the annual assessment artifacts linked to the controls they cover.

Common framework mappings

CIS Controls v8.1 | CSA STAR | ISO 27001:2022 | ISO 27017 | ISO 27018 | NIST 800-37 Rev.2 | NIST 800-53 Rev.5 | SOC 2

Official resources

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 Continuous Monitoring Strategy Guide

Outlines strategies for continuous monitoring of cloud services under FedRAMP.

fedramp.gov/legacy/playbook/csp/continuous-monitoring/intro

FedRAMP Security Controls Baseline

Describes the baseline security controls necessary for FedRAMP compliance.

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

FedRAMP Plan of Action and Milestones Template Guide

Outlines the template for managing corrective actions for non-compliant security controls.

fedramp.gov/legacy/assets/LEGACY%20FedRAMP-POAM-Template.xlsx

Frequently asked questions

Is FedRAMP Rev5 still open to new cloud providers?

Yes, until June 11, 2027, when FedRAMP stops accepting new Rev5 certification applications. New Rev5 applications made from January 1, 2027 must already follow the Consolidated Rules for 2026, and FedRAMP advises providers to consider 20x first because it is retiring Rev5 as a certification type.

Who runs FedRAMP and who approves an authorization?

FedRAMP is a program within the General Services Administration under the FedRAMP Authorization Act (44 U.S.C. 3608). The FedRAMP Board of up to seven agency officials sets the requirements (section 3610). Under the Rev5 agency path a federal agency authorizing official issues the Authority to Operate, and FedRAMP reviews the package before listing the service as FedRAMP Certified.

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How many controls are in the Rev5 baselines?

The FedRAMP Security Controls Baseline lists 156 controls for Low, 323 for Moderate and 410 for High, selected from NIST SP 800-53 Rev. 5 across 18 control families. The Tailored LI-SaaS baseline uses the same 156 controls as Low with tailoring actions that let the provider attest to many of them.

What does continuous monitoring require under Rev5?

The provider uploads an updated inventory and POA&M and vulnerability scan reports each month (controls CM-8 and RA-5), reports incidents and significant changes, and has an independent assessment at least annually (CA-2). Providers with more than one agency customer run collaborative continuous monitoring (CA-7). The 2026 rules replace the POA&M with a list of Accepted Weaknesses.

Can an agency reuse another agency's FedRAMP authorization?

Yes. Section 3613 of title 44 presumes that the controls and materials in a FedRAMP authorization package are adequate for an agency's own authorization to operate, and requires agencies to reuse existing assessments to the extent practicable. Each agency still issues its own ATO and sends a copy to GSA.

License included / downloadable: Yes The FedRAMP rules, baselines and legacy templates are U.S. government works published free of charge on fedramp.gov; the NIST SP 800-53 Rev. 5 catalog they select from is also free.

Full framework page and mappings: smartsuite.com/frameworks/fedramp-rev-5-federal-risk-and-authorization-management-program

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