



September 05, 2024

Federal Risk and Authorization Management Program
General Services Administration
1800 F Street, NW Suite 400
Washington DC, 20405

Submitted electronically via fedramp.gov

Re: FedRAMP Key Performance Metrics Feedback

The Cloud Service Providers-Advisory Board (CSP-AB) welcomes the opportunity to respond to the proposed set of metrics put forward by the Federal Risk and Authorization Management Program (FedRAMP) that aim to measure the end to end authorization experience of users and align with its mission of being a security-first program.

The CSP-AB represents the world's leading cloud companies and supports standards and policies that promote and enable secure cloud adoption in the public and private sectors. Our member companies are global leaders in the drive to provide safe, scalable, and accredited digital government services, with a focus on both the civil servants delivering those services and the end-users receiving them. Collectively, our members hold over 700 authorizations to operate (ATOs) across all service models and impact levels, and adhere to U.S. Government FedRAMP requirements. As such our members are uniquely positioned to speak with significant commercial experience of the authorization process.

As an overarching point, we are heartened to see FedRAMP undertaking such a proactive and fulsome review of the authorization process. The CSP-AB recognises how rapidly the FedRAMP program has grown since its inception, and so inevitably costs and timelines have escalated in tandem. We therefore fully support this review to ensure the process is as efficient and streamlined as possible, while maintaining a 'security first' approach. However, while long term strategic reviews are crucial, we also encourage FedRAMP to be agile and consider short to medium term amendments in concert. Our members are all live in the FedRAMP environment and many therefore have SCRs and/or packages which are stuck in significant backlogs awaiting PMO review and approval. The impacts of these delays are considerable, resulting in our members incurring unnecessary commercial delays and costs. We urge FedRAMP to act swiftly where it can to reduce the existing backlogs, while also contemplating the longer term efficiencies of the authorization process.

Relatedly, we would like to see FedRAMP introduce metrics related to SCRs or CSP backlogs. It would greatly improve transparency and communication if the PMO would track the total number of SCRs and CSPs in the backlog as well as information related to how long they have been waiting.

The CSP-AB also submits the following feedback for consideration on the metrics proposed:

- Account for total FTEs alongside time/cost metrics [metrics 1-5, 8, 10].

We request that FedRAMP contemplates including an FTE count, which will allow for a more holistic estimate of work effort than measuring cost alone, as staff costs can vary significantly between CSPs.

- Publicize the direct and indirect reuse figures [metrics 6 and 7].

Publicizing these metrics on the marketplace, which are objective and non-sensitive, will indicate the success of the concept of reuse and provide additional insight into the adoption rate of certain CSOs.

- Strengthen the Direct Reuse metric [metric 6]

Rather than only “the total number of authorizations represented by ATO/ATU letters on file with FedRAMP” we also encourage FedRAMP to include “the total number of authorizations re-used by agencies per Fiscal Year Quarter.” Additionally, it would be useful for the PMO to establish a target for agencies to perform against on an annual basis.

- Expand what is measured with controls [metric 8]

We recommend expanding this metric to account for costs incurred in the design and implementation of controls rather than only those associated with documenting controls.

Finally, the CSP-AB notes that the internal metrics are a reasonable reflection of industry best practices and broadly align with the metrics generated within our member organizations.

We thank you for your consideration of our comments and the CSP-AB stands ready to serve as a resource as FedRAMP continues to refine the proposed metrics.

Sincerely,



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