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# Congress of the United States
## House of Representatives

COMMITTEE ON OVERSIGHT AND ACCOUNTABILITY

2157 RAYBURN HOUSE OFFICE BUILDING

WASHINGTON, DC 20515–6143

MAJORITY   (202) 225–5074
MINORITY   (202) 225–5051

https://oversight.house.gov

September 26, 2024

The Honorable Robin Carnahan
Administrator
U.S. General Services Administration
1800 F Street, N.W.
Washington, DC 20405

Dear Administrator Carnahan:

Cloud technologies are increasingly relied upon by Federal agencies to provide services to citizens, manage information systems, and protect personally identifiable data. To reduce cybersecurity risk, agencies must vet the safety of a cloud product or service prior to purchase. That vetting is facilitated by the Federal Risk and Authorization Management Program (FedRAMP), a government-wide initiative housed in GSA that standardizes security assessments and streamlines the authorization of cloud products and services for government use. By reducing duplicative security vetting efforts across agencies, FedRAMP is intended to ease and accelerate the government's use of cloud technology.

The Administration created a bottleneck in this vital process, however, when it chose to shut down an existing FedRAMP authorization pathway before putting in place an alternative solution. What's more, GSA left in limbo cloud service providers (CSPs) who invested time and resources in the now-defunct authorization process. Ultimately, unnecessarily delayed authorizations may reduce availability of cloud products and services to agencies.

On July 25, 2024, the Office of Management and Budget (OMB) issued M-24-15, "Modernizing the Federal Risk and Authorization Management Program (FedRAMP)."[1] This memorandum required FedRAMP to offer additional authorization pathways, to include, agency authorizations, program authorizations, and any other paths to authorization designed by the FedRAMP program management office (PMO).[2]

Several months prior, in May 2024, the FedRAMP PMO terminated the Joint Authorization Board (JAB) and JAB authorization pathway.[3] In doing so, it paused pending

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[1] OFFICE OF MANAGEMENT AND BUDGET., M-24-15, MODERNIZING THE FEDERAL RISK AND AUTHORIZATION MANAGEMENT PROGRAM (FEDRAMP), (July 25, 2024).

[2] *Id.*

[3] News Release, U.S. General Services Administration, FedRAMP board launched to support safe, secure use of cloud services in government (May 14, 2024).

authorizations for CSPs who had already begun the JAB authorization process. This has led to indefinite uncertainty and monitoring costs for CSPs.

None of this was unanticipated. Aware of the pending transition, the Committee on Oversight and Accountability in November 2023 asked you in writing to detail how the transition would treat authorizations already being considered under the JAB process.[4] In your written response, you stated:

> *The FedRAMP Program Management Office (PMO) at GSA is working with OMB, as well as the agencies that comprised the Joint Authorization Board, to develop a transition strategy to the new program governance model that minimizes any disruption to Cloud Service Providers (CSPs) that are currently working with agencies or the Joint Authorization Board. The active authorization and assessment work that is being done either by the agencies or the FedRAMP PMO will continue in earnest. FedRAMP's goal is to ensure that commitments made to CSPs by the FedRAMP program and the Joint Authorization Board will be honored as they work toward authorization.*

But it appears there is no transition strategy and there has certainly been disruption to CSPs with authorization processes that were actively underway.

On August 12, 2024, FedRAMP posted a blog titled, "Moving to One FedRAMP Authorization: An Update on the JAB Transition."[5] It stated, "In the short term, the FedRAMP team will work with a limited number of CSPs originally prioritized by the JAB, who do not have an immediate agency partner, to issue a program authorization. Longer term, we plan to develop criteria and an approach for opening this path market-wide."[6]

That post was contradicted, exactly one month later, on September 12, 2024, in an email obtained by the Committee. In the email, the FedRAMP team told at least one of these CSPs that, "Until a pilot process is ready for implementation, the only way a cloud service offering can be FedRAMP authorized is using the existing approved agency sponsorship path that was not changed by the recent memorandum."[7]

It remains unclear when and how CSPs previously prioritized for JAB authorization will be eligible for program authorization. This has resulted in continued uncertainty for CSPs that have already waited nearly a year for clear guidance on what the JAB transition means for them.

To better understand the implementation process for recent FedRAMP policy changes, the Committee requests answers to the following questions at a staff briefing as soon as possible but no later than October 3, 2024:

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[4] Oversight of the U.S. General Services Administration: Hearing Before H. Comm. On Oversight & Accountability, 118th Cong. (Nov. 14, 2023).
[5] Blog Post, U.S. General Services Administration, Moving to One FedRAMP Authorization: An Update on the JAB Transition (August 12, 2024).
[6] *Id.*
[7] E-mail available on file with the Committee.

1. What is the cost to the FedRAMP PMO and the estimated cost to CSPs to achieve a JAB authorization?

2. Why did the FedRAMP PMO decide to terminate the JAB and JAB authorization pathway before establishing the program and multi-agency authorization pathways?

3. How were CSPs informed of the decision to terminate the JAB, and what options were they provided at the time?

4. How long will it take to establish the program and multi-agency authorization pathways and make them available market-wide?

5. Why did the FedRAMP PMO change its position with regard to the authorization process for CSPs that were actively underway?  What happened between the August blog post and September email—both referenced above—to bring about this change?

The Committee further requests the following documents and information covering the time period January 1, 2023 to the present, as soon as possible but no later than October 10, 2024:

1. All internal documents and communications related to the implementation of recent FedRAMP policy changes, including policies related to the FedRAMP Authorization Act, OMB Memo M-24-15, and the FedRAMP PMO's March 28, 2024, roadmap.

2. All documents and communications provided to CSPs impacted by the termination of the JAB and JAB authorization pathway.

3. All documents and communications provided to CSPs impacted by the creation of new FedRAMP authorization pathways.

4. All documents and communications provided to CSPs whose authorization process was actively underway, including a list identifying those CSPs and a corresponding description of the authorization being sought.

To make arrangements to deliver documents or ask any related follow-up questions, please contact Committee on Oversight and Accountability Majority Staff at (202) 225-5074. Attached are instructions for producing the documents and information to the Committee.

The Committee on Oversight and Accountability is the principal oversight committee of the U.S. House of Representatives and has broad authority to investigate "any matter" at "any time" under House Rule X.  Thank you in advance for your cooperation with this inquiry.

Sincerely,


Nancy Mace
Chairwoman
Subcommittee on Cybersecurity, Information Technology,
and Government Innovation


cc:    The Honorable Gerald Connolly, Ranking Member
       Subcommittee on Cybersecurity, Information Technology, and Government Innovation