

FedRAMP Rev 4 to Rev 5: What You Need to Know



Timeline and Applicability Information

(NIST 800-53 Rev 4 to Rev 5)

For FedRAMP Initial Assessments:

- Who can be assessed against Rev 4 (as of May 30, 2023)?
 - Cloud Service Providers (CSPs) that are prioritized for the Joint Authorization Board (JAB) and under contract with a Third-Party Assessment Organization (3PAO), or have already started their assessment will be assessed against Rev 4
 - CSPs that have an agency sponsor and are under contract with a 3PAO for a FedRAMP Initial Assessment will be assessed against Rev 4
 - Any CSP currently in the middle of a FedRAMP Initial Assessment should continue the assessment against Rev 4
 - After completing the assessment, the CSP must create a transition plan by September 1, 2023 and revise based on leveraged controls by October 3, 2023
- Who must be assessed against Rev 5?
 - Any CSP with a FedRAMP Readiness Assessment currently under review by FedRAMP will be assessed against Rev 5 during their FedRAMP Initial Assessment
 - CSPs that do not have a sponsor will be assessed against Rev 5 during their FedRAMP Initial Assessment
 - CSPs that have a sponsor (Agency or JAB) but do not have a contract with a 3PAO for a FedRAMP Initial Assessment will be assessed against Rev 5 for their FedRAMP Initial Assessment

For FedRAMP Annual Assessments:

- CSPs must create a transition plan by September 1, 2023 and revise based on leveraged controls by October 3, 2023
 - Details on this have not yet been released
 - This transition plan describes the control deltas that must be tested
- If CSPs complete their Rev 4 FedRAMP Annual Assessment by July 3, 2023, they must execute their transition plan to Rev 5 within 12 months of the Security Assessment Report (SAR) date
- If a CSP's FedRAMP Annual Assessment is scheduled to occur between July 3, 2023 and December 15, 2023, they must execute their transition plan prior to their next annual assessment
 - At this time, it is unclear if Rev 5 will be required for FedRAMP Annual Assessments that fall between July 3, 2023 and December 15, 2023. The FedRAMP PMO will be posting an FAQ for more clarity.

For more information, please see the [FedRAMP Baseline Revision 5 Transition Plan](#) and be on the lookout for additional templates and FAQs from FedRAMP.

Level of Effort and Technical Changes

(Rev 4 to Rev 5)

Initial Assessment - Low Baseline

- FedRAMP Low goes from 125 controls (Rev 4) to 156 controls (Rev 5)
- 3 controls were removed in Rev 5
- 34 controls were added in Rev 5
- 71 additional parameter, control, or guidance changes

Initial Assessment - Moderate Baseline

- FedRAMP Moderate goes from 325 controls (Rev 4) to 323 controls (Rev 5)
- 47 controls were removed in Rev 5
- 45 controls were added in Rev 5
- 114 additional parameter, control, or guidance changes

Initial Assessment - High Baseline

- FedRAMP High goes from 421 controls (Rev 4) to 410 controls (Rev 5)
- 60 controls were removed in Rev 5
- 49 controls were added in Rev 5
- 134 additional parameter, control, or guidance changes

Annual Moderate Assessment - Rev 4 to Rev 5

- Introduces 10 additional controls compared to what a typical annual assessment would normally assess
- Will need to include 87 Core Controls*, 45 new controls, and 51 controls with parameter, control, or guidance changes that are not included in the core (Total = 183)

Annual High Assessment - Rev 4 to Rev 5

- Introduces 65 additional controls compared to what a typical annual assessment would normally assess
- Will need to include 91 Core Controls*, 49 new controls, and 131 controls with parameter, control, or guidance changes that are not included in the core (Total = 271)

**Core Controls are based on the Rev 4 Core Controls, minus those that have been deprecated in Rev. 5. The FedRAMP PMO intends to release a new core controls list in the near future that may adjust these numbers.*

Note: This analysis is based on existing information published to the <https://www.fedramp.gov/> as of 5/31/2023.

Note: Annual assessment and parameter change analysis is based on the FedRAMP provided Rev. 4 to Rev. 5 Baseline Comparison Summary located here:

https://www.fedramp.gov/assets/resources/documents/FedRAMP_Security_Controls_Baseline_Rev5_Rev4_comparison_Summary.xlsx