



DEFENSE INFORMATION SYSTEMS AGENCY

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DISA Authorizing Official (AO)

MEMORANDUM FOR FEDRAMP APPROVED CLOUD SERVICE PROVIDERS (CSPs)
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DEFENSE
CHIEF INFORMATION OFFICER OF THE DEPARTMENT OF
DEFENSE
SECRETARIES OF THE MILITARY DEPARTMENTS
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DIRECTORS OF THE DEFENSE AGENCIES
DIRECTORS OF THE DOD FIELD ACTIVITIES

SUBJECT: (U) Department of Defense (DoD) Memorandum of Reciprocity for FedRAMP
Authorized Moderate Baseline Cloud Service Offerings (CSO) at Impact Level 2 (IL2)

- References:
- (a) (U) DoDI 8510.01, Risk Management Framework (RMF) for DoD Information Technology (IT), 28 July 2017
 - (b) (U) OMB Policy Memo, FCIO, Security Authorization of Information Systems in Cloud Computing Environments, Federal Risk and Authorization Management Program (FedRAMP), 08 December 2011
 - (c) (U) DoD Memo, CIO, Updated Guidance on the Acquisition and Use of Commercial Cloud Computing Services, 15 December 2014
 - (d) (U) DISA Memo, Appointment of Authorizing Official for Defense Information Systems Agency, 04 April 2018
 - (e) (U) DoD Cloud Computing Security Requirements Guide (SRG), Version 1, Release 3, 06 March 2017

(U) DISA Memo, RME, DoD Memorandum of Reciprocity for FedRAMP Authorized Moderate Baseline Cloud Service Offerings (CSO) at IL2

- (f) (U) FedRAMP Memo on Ongoing Authorization, 22 December 2015
- (g) (U) DoD Memo, CIO CISO, Treatment of Personally Identifiable Information within Information Impact Level 2 Commercial Cloud Services for the Department of Defense, 07 August 2019
- (h) (U) NIST SP 800-122, "Guide to Protecting the Confidentiality of Personally Identifiable Information (PII)," April 2010
- (i) (U) DoD Memo, CIO/Comptroller, System and Organization Control Report Requirement for Audit Impacting Cloud/Data Center Hosting Organizations and Application Service Providers, 20 May 2019

1. (U) **Authorization:** In accordance with reference (a) through (f), a FedRAMP authorized Cloud Service Offering (CSO) that has: (1) demonstrated compliance with the FedRAMP Moderate Baseline, and (2) has been granted a FedRAMP Joint Authorization Board (JAB) or Agency authorization (based on an assessment and ATO issued by a government agency where the CSP was assessed by a FedRAMP accredited/approved 3PAO) is hereby designated as a DoD Impact Level 2 (IL2) CSO via reciprocity (unless specifically revoked). This designation will expire when the CSO's FedRAMP JAB or Agency authorization expires, or is specifically revoked.

2. (U) **Applicability:**

a. (U) Per reference (c), components may host publicly releasable unclassified DoD information on FedRAMP approved cloud services.

b. (U) This reciprocity memo applies to CSOs that have been authorized at the Moderate baseline and are listed in the FedRAMP Marketplace. Information and associated authorization artifacts are available at <http://fedramp.gov> and from the Cloud Service Provider's (CSP) listed point-of-contact.

3. (U) **Conditions:**

a. (U) Reciprocity is contingent upon the CSP maintaining the FedRAMP JAB or Agency authorization for the CSO and adhering to successful Continuous Monitoring (ConMon) practices. If the FedRAMP JAB or Agency authorization is suspended, revoked, restricted, or limited in any manner, the DoD IL2 reciprocity for that CSO is considered suspended until all issues with the authorization are mitigated in accordance with reference (a), (d), and (f), and the FedRAMP JAB or Agency authorization is reinstated or issued a new authorization.

b. (U) If the risk of operating the CSO is deemed unacceptable to the DoD, an explicit DoD Denial of Authority to Operate will be issued for the offering and posted to DoD's authorized CSP web page.

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c. (U) Only data categorized as IL2 per reference (e) is permitted in the US datacenters authorized for the CSO. The Mission Owner (MO) AO is responsible for ensuring that all data, including any scripts, look up tables, databases, or other files, hosted on the CSO, are correctly categorized as IL2. In addition, low confidentiality Personally Identifiable Information (PII) may be hosted in a DoD IL2 CSO subject to the conditions noted in reference (g) and supported by reference (h).

d. (U) Non-US locations of a FedRAMP JAB or Agency authorization are not included under reciprocity and must be explicitly authorized by the DISA Authorizing Official (AO).

e. (U) Any significant change, including location and data security level, requires re-submission by the CSP to FedRAMP and/or the Authorizing Agency.

4. (U) **DoD Usage Considerations:**

a. (U) The DoD's MO AOs can leverage the CSO's FedRAMP authorization as a foundation for its risk assessment, required for the granting of an ATO for the acquisition and use of the CSP's CSO.

b. (U) DoD Mission Owners are limited to the use of US datacenters as outlined in reference (e). Any non-US datacenter listed in any FedRAMP package is not authorized and is therefore not approved for mission owning workload.

c. (U) This reciprocity memo does not constitute endorsement by DISA or DoD of the suitability of a CSP's CSO for any particular MO requirement. It does not replace or eliminate the requirement for the MO to issue an ATO for the MO's acquisition and implementation within the CSP's CSO. DISA recommends each MO AO refer to reference (e), available at: <https://cyber.mil/dccs>.

d. (U) The MO's AO should consider the fact that the CSP's CSO received a FedRAMP authorization, signed by the Chief Information Officers (CIOs) of one or more Federal Agencies for a JAB authorization, or by the Authorizing Official from a federal agency for an Agency ATO. The CSP's offering has not yet been assessed or validated for any DoD requirements above the FedRAMP Moderate baseline according to reference (e). The MO's AO should carefully review the available authorization artifacts to make an informed decision before granting an ATO to a DoD system using the CSO.

e. (U) The MO's AO is responsible for issuing an accreditation for the system and data deployed within the IL2 environment. If the system/data is financial audit relevant, the AO must ensure that the CSO currently meets Statement of Standards for Attestation Engagements (SSAE), System and Organization Controls (SOC 1) Type II requirements as outlined in reference (i).

5. (U) **Point of Contact:** Questions regarding this action should be directed to the DoD Cloud Authorization Services (DCAS) team at disa.meade.re.mbx.cloud-team@mail.mil or the Security

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