Date: 08/18/2025

From: Coalfire Systems, Inc.

To: FedRAMP PMO

Subject: Coalfire - Filevine FedRAMP 20x Validated Assessment

Coalfire Systems, Inc. ("Coalfire"), an American Association for Laboratory Accreditation (A2LA) accredited FedRAMP Third-Party Assessment Organization (3PAO), has partnered with Filevine to perform a FedRAMP 20x Validated Assessment. The objective of the assessment is to demonstrate compliance with Key Security Indicators (KSIs) established by FedRAMP for the 20x Phase One Pilot and to work towards FedRAMP authorization. Assessment activities took place between 08/11/2025 and 08/18/2025. The focus of the assessment was on the Vinesign application and its implementation of the KSIs.

Assessment activities were performed by Coalfire directly within the Paramify Cloud web application. Collaborative interview discussions were held between Coalfire and the Filevine team to ensure understanding of KSI implementations. Paramify has developed a specific FedRAMP 20x assessment framework within the application that uses Paramify Risk Solutions and evidence associations to demonstrate compliance with KSIs. Risk Solutions are various security capabilities that are then mapped to various requirements. In this case those requirements are the FedRAMP 20x KSIs. Filevine provided relevant information about their Cloud Service Offering (CSO) that translates into Solution Implementations within the platform.

Coalfire's methodology for the FedRAMP 20x Validated Assessment is based on completeness, accuracy, timeliness, and exceptions when it comes to the automated and manual demonstration of the KSIs. To establish completeness, Coalfire reviewed the inventory, diagrams, and system documentation to understand the resources and services that make up the CSO. To establish accuracy, Coalfire reviewed the evidence provided within Paramify Cloud and ensured that the evidence and documentation was representative of the inventory, diagrams, and system documentation. To establish timeliness, the application maintains timestamps on upload activity for when evidence is added to a KSI. Manual evidence often contains date and time information to further support timeliness. To manage exceptions, Filevine can supply additional evidence, comments, and references to each KSI implementation in the platform.

Based on the results of the assessment activities Coalfire has produced human-readable and machine-readable assessment reports. These reports detail the status of each KSI validation (True, False, Partial) and provide details on the tests and evidence reviewed by Coalfire in determining implementation status. All evidence was reviewed directly within the Paramify Cloud. Provided below are the example Data Dictionary and Output:

Data Dictionary:

```
{
    "KSI Requirement": Internal Coalfire Evidence Indicator,
    "KSI Name": Title of the evidence request,
    "KSI Description": Longer description of the evidence requests to meet the requirements listed in the "Requirements"
field,
    "KSI Domain": Coalfire defined domain for organization purposes and mapping to other frameworks,
    "Evidence Category": Coalfire defined category for organization purposes and mapping to other frameworks,
    "Control Requirements": FedRAMP requirements that the control pertains to and may be more exhaustive than
minimum requirements for current baseline.
    "Compliance Status": True=Compliance, False=Non-Compliant, Partial=Partially Compliant
    "Test Method": Automated, AI-Validated, Manual
    "Assessment Narrative": "",
    "Senior Assessor": Last Name, First Name of the Senior Assessor responsible for validation
    "Date Tested": Date Coalfire tested the CSP controls
  },
```

Example Output:

```
[
        {
            "KSI Requirement": KSI-CED-01,
            "KSI Name": "Conduct employee security training",
            "KSI Description": " Require role-specific training for high risk roles, including at least roles with privileged
        access.",
            "KSI Domain": "Cybersecurity Education",
            "Evidence Category": "Technical",
            "Requirements": "at-2 Literacy Training and Awareness
                    at-2.2 Insider Threat
                    at-2.3 Social Engineering and Mining
                    at-4 Training Records",
            "Compliance Status": "Partial",
            "Test Method": "Automated ",
            "Assessment Narrative": "Role-based training is provided through the learning management system.",
            "Senior Assessor": "Last, First",
            "Date Tested": "1/1/25"
        }
]
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Sincerely,

Jorden Foster

box SIGN   19WR6531-4ZZWP726

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