

BALTIMORE CYBER RANGE (BCR) TECHNICAL PROFICIENCY ACTIVITY PHASED PARTICIPATION REQUIREMENTS

Version 1.0

December 21, 2018



FedRAMP

REVISION HISTORY

Date	Version	Page(s)	Description	Author
12/21/18	1.0	All	Initial version	FedRAMP PMO



ABOUT THIS DOCUMENT

This transition document describes the phased timelines that the Federal Risk Authorization Management Program (FedRAMP) Third Party Assessment Organizations (3PAOs) must meet to be in compliance with FedRAMP's participation requirements for the Baltimore Cyber Range (BCR) Technical Proficiency Activity.

This document expands on Section 2.0 of the American Association for Laboratory Accreditation (A2LA) *R346 – Specific Requirements: Baltimore Cyber Range (BCR) Cybersecurity Technical Proficiency Activity Information*, 10/22/18; and with Sections 3.2, 4.5, and 6.1.10 F.3 of the A2LA *R311 - FedRAMP Specific Requirements: Federal Risk and Authorization Management Program (FedRAMP)*, 10/22/18, which was released by A2LA in partnership with FedRAMP.

This document is not a FedRAMP template – there is nothing to fill out in this document.

WHO SHOULD USE THIS DOCUMENT?

This document is intended to be used by recognized FedRAMP 3PAOs.

HOW TO CONTACT US

Questions about FedRAMP or this document should be directed to info@fedramp.gov.

For more information about FedRAMP, visit the website at <https://www.fedramp.gov>.



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1. PURPOSE

This document establishes a phased approach for Third Party Assessment Organization (3PAO) assessment teams for taking and passing the Federal Risk Authorization Management Program (FedRAMP) Baltimore Cyber Range (BCR) Cybersecurity Technical Proficiency Activity exercise, which is a requirement for 3PAO participation in FedRAMP.

2. BACKGROUND

3PAO independent assessments serve as the basis for which the federal government can make authorization decisions regarding cloud service offerings (CSOs). 3PAOs play a critical role within the FedRAMP authorization process; ensuring 3PAO competency is essential to the program's success.

On October 22, 2018, FedRAMP, in partnership with the American Association for Laboratory Accreditation (A2LA), released *R311 - Specific Requirements: FedRAMP*, which includes new qualifications for existing and new 3PAOs. As part of this update, all 3PAO assessors (as described below) are now required to take and pass a hands-on proficiency exercise conducted by the BCR.

3. PARTICIPATION PHASES

3.1. Phase 1: Single Team Roll-Out

By **March 1, 2019**, a team consisting of 3-5 assessors from existing FedRAMP 3PAOs must pass the BCR Cybersecurity Technical Proficiency Activity. Each assessment team must include one senior representative and one quality representative, as defined in Sections 6.1.1 F.1 through 6.1.1 F.4 of the R311. Each organization is encouraged to contact A2LA to make testing arrangements (FedRAMP@A2LA.org) as soon as possible.

If a 3PAO fails to participate as required, the FedRAMP Program Management Office (PMO) may revoke or suspend FedRAMP 3PAO recognition.

3.2. Phase 2: Full Requirement Roll-Out

As of **July 31, 2019**, only assessors who have passed the BCR Cybersecurity Technical Proficiency Activity will be allowed to perform FedRAMP 3PAO assessments. It is an organization's responsibility to ensure their working teams have participated by this date.

If a 3PAO fails to participate, or fails to have its assessors meet this deadline, the FedRAMP PMO may suspend or revoke FedRAMP 3PAO recognition.

3.3. Phase 3: Annual Recertification

Annual recertification is required once every 12 months after an individual successfully passes the BCR Cybersecurity Technical Proficiency Activity. This information must be included within the respective



3PAO Technical Proficiency Activity Participation Plan, which must be provided to A2LA and the FedRAMP PMO.

3.4. Penetration Tester Applicability

Penetration testers are exempt from, but are highly encouraged to participate in, the BCR Cybersecurity Technical Proficiency Activity, in accordance with R346 – *BCR Technical Proficiency Testing Activity Information*, Section 2.0. Penetration tester requirements are outlined in R311, Section 6.1.1.F.3.

4. 3PAO TECHNICAL PROFICIENCY ACTIVITY PARTICIPATION PLAN

FedRAMP 3PAOs and Independent Assessment Organizations (IAOs) seeking FedRAMP 3PAO recognition must meet the requirements for the technical proficiency activity set forth in R346.

In accordance with R346, 3PAOs and IAOs must create a 3PAO Technical Proficiency Activity Participation Plan to address when each member of the team participates in the BCR hands-on cybersecurity technical activity. Penetration testers must be listed in the 3PAO Technical Proficiency Activity Participation Plan and their individual penetration testing credentials, as required by R311 Section 6.1.1.F.3.

The 3PAO Technical Proficiency Activity Participation Plan must be submitted to A2LA and to the FedRAMP PMO by **February 1, 2019**. The plan must delineate assessment team member roles (e.g., Senior Representative, Junior Tester, Quality Representative, Penetration Tester, etc.), and must include the timeframes within which the organizational assessment team will document compliance with Phase 1 and Phase 2 requirements.

4.1. Onboarding New Assessors without BCR Cybersecurity Technical Proficiency Activity

As of **July 31, 2019**, if a FedRAMP 3PAO onboards new assessors without prior BCR Cybersecurity Technical Proficiency Activity testing, written notification must be provided by the 3PAO to A2LA and to the FedRAMP PMO within one week of an individual's start date.

The 3PAO Technical Proficiency Participation Plan must be updated to reflect onboarded personnel without the BCR Cybersecurity Technical Proficiency Activity, as well as the following:

1. Provide a proposed timeline for a new assessor's participation in the BCR Cybersecurity Technical Proficiency Activity, and
2. Document utilization of the new assessors before they have passed the BCR Cybersecurity Technical Proficiency Activity testing will exhibit minimal risk to 3PAO assessment quality.

The 3PAO must provide the updated plan to A2LA. If the 3PAO is proposing using a new assessor for any assessment activities prior to that individual participating in the BCR Cybersecurity Technical Proficiency Activity, this information must be submitted in a request to the FedRAMP PMO for written approval.



4.2. Onboarding Assessors with BCR Cybersecurity Technical Proficiency Activity

As of **July 31, 2019**, if a 3PAO onboards an assessor who passed the BCR Cybersecurity Technical Proficiency Activity with another organization, written notification must be provided to A2LA and the FedRAMP PMO within one week of the individual's start date. Additionally, that notification must include:

1. The date on which the individual passed the BCR Cybersecurity Technical Proficiency Activity,
2. The organization the individual was aligned with when the BCR Technical Proficiency Test was passed, and
3. The role on the assessment team the individual will fill for the new 3PAO.

A2LA and the FedRAMP PMO will review this information and provide a confirmation to the 3PAO that the individual assessor meets the requirements to conduct 3PAO testing.

Annual recertification of these individuals will coincide with the original date the individual passed the BCR Cybersecurity Technical Proficiency Activity, and must be reflected in the 3PAO Technical Proficiency Activity Participation Plan.



APPENDIX A FEDRAMP ACRONYMS

The *FedRAMP Master Acronyms & Glossary* contains definitions for all FedRAMP publications, and is available on the FedRAMP website [Documents](https://www.fedramp.gov/documents/) page under FedRAMP Program Documents.

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Please send suggestions about corrections, additions, or deletions to info@fedramp.gov.