

What the FedRAMP RFCs Mean for Your Business

January 2026

The Time-Boxed Opportunity Most Will Miss



RFC-0023: REV 5 CERTIFICATIONS WITHOUT AGENCY SPONSOR

FedRAMP proposes a limited window for Rev 5-ready providers to obtain Certifications at Levels 1-4 without finding an agency sponsor.

WHY THIS MATTERS

Organizations have historically stalled at the "find an agency sponsor" step. This window temporarily removes the single hardest gate for CSPs already close to completion.

THE CLOCK IS TICKING

Providers who wait for perfect readiness will miss this advantage entirely.

Your SOC 2 Type II and CMMC Work Could Count

RFC-0022: Temporary Level 1 Validation Path

Providers could leverage existing SOC 2 Type II, CMMC Level 2, and similar assessments to support limited-use FedRAMP validations.¹

What Executives Miss

Most CSPs view compliance as separate silos. RFC-0022 proposes a bridge between SOC 2, CMMC, and FedRAMP.

The Strategic Question

Can you design a single control strategy that satisfies SOC 2, CMMC, and FedRAMP 20x simultaneously?

The Opportunity

Mature SOC 2 Type II, CMMC, or other programs could pilot federal services under this temporary pathway while building toward full authorization.²

1: Approved Security Frameworks: SOC 2 Type II, ISO/IEC 27001, HITRUST e1, i1, r2, StateRAMP (dba GovRAMP) Provisionally Authorized, Authorized, CMMC Level 2, FedRAMP Ready. fedramp.gov/rfcs/0022/

2: Assuming your assessment was completed within the last 12-24 months & covers the right scope.

Static Documents Probably Won't Cut It by 2027



RFC-0024: MACHINE-READABLE SECURITY PACKAGES

Effective date proposed late 2026 with one-year grace period. Providers will need to modernize evidence generation and submission.

THE REALITY CHECK

Static SSPs and Excel inventories build technical debt. Continuous validation becomes the norm.

WHAT CHANGES

Structured evidence required
Manual updates unsustainable
API-driven evidence export

THE 24-MONTH QUESTION

Can your compliance program evolve from documentation-first to evidence-first before the deadline?¹

1: FedRAMP RFC-0024: Grace period for adopting machine-readable authorization packages expires September 30, 2027. Any non-compliant service loses FedRAMP Certification after the expiration date. fedramp.gov/rfcs/0024/

Position your company for structural advantages now



MAP YOUR CURRENT STATE TO TEMPORARY PATHWAYS



Evaluate RFC-0022 if you have SOC 2/CMMC. Assess RFC-0023 if you're Rev 5-ready but you don't have a sponsor.

MODEL THE COST OF INACTION VS. EARLY MOVEMENT



Calculate the opportunity cost of federal deals delayed 18-24 months against accelerating investment now.

PLAN MACHINE-READABLE EVIDENCE BEFORE IT'S REQUIRED



Transition from static SSPs to structured, API-driven evidence. Build automation into your 2026 roadmap.

These RFCs represent FedRAMP's transition from traditional Rev 5 toward the 20x model. **Acting now positions you to shape that transition to your advantage.**

How ResilientTech Advisors Helps

FEDRAMP STRATEGY & ROADMAP ALIGNMENT



We partner with Boards, CEOs, and CISOs to turn RFCs into concrete decision briefs: market sizing, timing, dependencies, and realistic pathway options.

CONTROL & EVIDENCE ALIGNMENT



We map existing SOC 2, CMMC, and NIST work into FedRAMP 20x requirements, identify deltas, and design minimal-friction paths to Level 1 Validation.

MACHINE-READABLE DOCUMENTATION



We guide providers from static SSPs to structured evidence that's ready for machine-readable requirements while consumable by executives.

When cybersecurity becomes a business accelerator, everything changes



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LET'S TALK