Virtru Responses to Questions from Chairman Gerald E. Connolly

Will Ackerly, Co-Founder and CTO, August 13, 2019

Questions for the Record from the July 17, 2019 Hearing: "To The Cloud! The Cloudy Role of FedRAMP in IT Modernization"

1. From your perspective, when should a company seek an agency sponsored Federal Risk and Authorization Management Program (FedRAMP) authorization versus a provisional authorization to operate through the Joint Authorization Board (JAB)? Do you envision an instance when a company would seek both?

   Will Ackerly - For us, the JAB process as it exists today would have made it difficult to meet agency mission needs. The agency sponsorship enabled us to validate specific agency mission needs and allowed us to make a more informed business decision with a potential roadmap for return on our investment. Because of this validation of potential customer requirements, we believe that most companies should go through the agency process and work with agencies and the PMO to reuse that initial authorization after it is completed. Further, it is our understanding that the JAB typically draws a harder line on the letter of the security controls, whereas agencies have the flexibility to focus on the intent of the security controls in order to meet their mission needs. As a result, the JAB authorization route may have added an increased burden on Virtru to meet the requirements, without actually improving the security of agencies leveraging our service. The JAB authorization is certainly valuable as it is easier to reuse across agencies so depending on the additional burden of process and paperwork, it could be beneficial to get the clearer roadmap to return on investment from the agency process while going through the JAB process to have an authorization that is much easier to reuse across agencies.

2. What advice would you give to cloud service providers seeking FedRAMP authorization?

   Will Ackerly - The biggest advice to other cloud service providers is to work with an agency and make sure you are addressing a mission need. This will ensure that the agency is incentivized to assist the provider throughout the process and work quickly. Plus, as we mentioned above, it provides a clearer path towards return on investment. Also, as much as is possible, try to develop a relationship with the PMO. They are the experts in the process, requirements, and hopefully, have worked with the agency before and can help. Finally, the provider must ensure that the company is supportive, not just a government or compliance team, as it will take effort across potentially engineering, product management, and other resources that are not dedicated to the Federal environment. Providers need to

understand that the burden of FedRAMP is ongoing and may require a cultural shift in process and product approaches.

3. What improvements would you like to see in FedRAMP?

Will Ackerly - While the process was valuable for Virtru, it was time-consuming and expensive. The process could be improved through streamlining reassessments and increasing the use of tailored baselines depending on the product and sensitivity level, empowering the FedRAMP PMO and the creation of a FedRAMP Lead at every agency, encouraging agencies to sponsor additional solutions and not hope for the JAB to authorize what they need to solve mission problems, and increase transparency in cost and timeline to help organizations make more informed decisions as well as in decisions made by the PMO or agencies. The process to initial authorization could be expedited by focusing on the highest risk security controls first and allowing for continued improvements as evaluated in annual reassessments for lower-risk controls.

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