

FedRAMP 20x Data Sheet: Understanding the New Classes

FedRAMP 20x replaces the old Low, Moderate, and High impact-level model with four certification classes: A, B, C, and D. The goal is to make certification more outcomes-based, more automated, and easier to align to how modern cloud services actually operate.

Class A is the entry point, Class B covers lighter federal use, Class C covers broader enterprise and Moderate-like use cases, and Class D is the future high-equivalent path planned through a later pilot.

What changed

-  **Authorization becomes Certification.** FedRAMP 20x now issues a certification. Agencies still decide whether to grant an ATO (Authority to Operate).
-  **Impact levels become Classes A-D:** The old baseline language is retired under the new model.
-  **Controls become Key Security Indicator (KSI*).** KSIs are validated through machine-readable, ongoing evidence instead of mainly narrative writeups.

* KSI is a concrete, measurable security outcome that a cloud provider must continuously prove e.g.: IAM, CNA, SVC

The new classes at a glance

Class	What is replaces	Best fit	KSI scope	Submission path
Class A	FedRAMP ready	New federal marketentry for a mature commercial services	7 KSIs	Uses existing assurance, especially SOC 2 Type II completed within the past 12 month
Class B	Low / LI-SaaS style path	Smaller scale services with lighter federal use	41 KSIs	Provider submits directly with automated KSI validation
Class C	Moderate	Enterprise SaaS and broader agency use	46 KSIs	Full KSI scope with deeper evidence expectations
Class D	High	Highest-sensitivity workloads	Defined in FY 27	For now, High remains on Rev 5 while providers prepare for the future 20x pilot

How to think about each class



Class A

The new entry tier for providers that want to enter the federal market.

- Built around minimal upfront documentation
- Primary source material is usually a recent SOC 2 Type II report
- Includes 7 required KSIs
- No agency sponsor required
- Status is time-limited and intended to lead into B, C, or D later



Class B

The lighter-use certification class for services unlikely to support critical agency work.

- 41 required KSIs
- Automated validation is required
- Independent assessment is required
- No agency sponsor required
- Pipeline opens



Class C

The broad enterprise path and the closest replacement for the old Moderate baseline.

- All 46 KSIs are required
- Includes the five indicators that are optional at Class B
- Independent assessment is required
- No agency sponsor required
- Pipeline opens



Class D

The future High-equivalent path is not fully available yet under 20x.

- Requirements are expected with a Phase 4 pilot in FY27
- Today, High-sensitivity customers remain on Rev 5 High
- Best current use is advisory and pilot readiness planning

What makes the classes different from the old model

Requirement	Class A	Class B	Class C	Class D
Required KSI scope	7	41	46	Defined FY 27
Automated validation methods per KSI	1 or more	1 or more	2 or more	4 or more
Historical metrics	Optional	Should provide historical metrics	Must show 6 months	Must show 18 months
FedRAMP recognized independent assessment (3PAO equivalent)	Optional Independent Verification & Validation	Required	Required	Rev 5 cadence for now
Agency sponsor needed	No	No	No	No

Why customers choose Prescient Security

- 1

Evidence is expected to come from live systems, tooling, and repeatable validation methods
- 2

Long narrative packages matter less than proving that the system is working
- 3

Cloud service provider owns and submits the package directly
- 4

Certification is not a one-time package exercise, evidence must stay current

The consolidated CR26 (FedRAMP Consolidated Rules for 2026) KSI catalog lists CNA-EIS, MLA-ALA, SVC-PRR, SVC-RUD, and SVC-VCM as optional KSIs. Whether any of these KSIs is required for a particular Class B or Class C certification depends on the applicable FedRAMP Certification Profile and the published Class B-to-C distinction principally increases the required maturity of automated validation and historical evidence.

The new FedRAMP 20x classes are meant to give providers a clearer ladder into federal certification. Class A is the on-ramp, Class B and C are the operational certification paths, and Class D is the future path for High-equivalent workloads.