

Date: 01/26/2026
From: Coalfire Systems, Inc.
To: FedRAMP PMO
Subject: Coalfire - Paramify FedRAMP 20x Moderate Methodology

Coalfire Systems, Inc. (“Coalfire”), an American Association for Laboratory Accreditation (A2LA) accredited FedRAMP Third-Party Assessment Organization (3PAO), has partnered with Paramify to perform a FedRAMP 20x Moderate Assessment. The objective of the assessment is to demonstrate compliance with Key Security Indicators (KSIs) established by FedRAMP for the 20x Phase Two Pilot and to work towards FedRAMP authorization. Assessment activities took place between 12/15/2025 and 01/26/2026.

Assessment activities were primarily performed directly within Paramify Cloud. Paramify has developed a FedRAMP 20x Moderate program within the application that allows for the mapping and validation of evidence against the 20x Phase Two requirements and recommendations. Paramify developed new features to address 20x requirements to include Validators, Trust Center capabilities, and updated dashboards.

Coalfire’s methodology for the FedRAMP 20x 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 has the goal of understanding what resources should be looked at for validation purposes. To establish accuracy, Coalfire has the goal of making sure that the right areas were being looked at against the assessment scope. To establish timeliness, Coalfire has the goal of understanding how evidence is being generated and the frequency that Paramify Cloud receives updated data. To handle exceptions, Coalfire has the goal of understanding how non-standard implementations are handled within Paramify Cloud.

Based on the results of the assessment activities Coalfire has produced human-readable and machine-readable assessment reports. These reports provide information on automation capabilities, assessor overview, and gaps that were identified. Gap information serves as opportunities for improvement as identified by Coalfire. All evidence was reviewed directly within the Paramify Cloud through direct user account access or through demonstration by the Paramify team for features that have additional access controls or remain in staging. Provided below are an example Data Dictionary and Output:

Data Dictionary:

```
{
  "Indicator ID": "FedRAMP Reference ID",
  "Title / Short Name": "FedRAMP Requirement Name",
  "Description / Requirement": "FedRAMP Requirement Description",
  "Automation Capability": "Detail on automation used",
  "Assessor Overview": "Assessor details on how implementations were tracked",
  "Gaps": "Gaps or Flaws identified.",
  "Applicability (Impact Levels)": "Low, Moderate, High"
}
```

Example Output:

```
{
  "Indicator ID": "FRR-MAS-01",
  "Title / Short Name": "Cloud Service Offering Identification",
  "Description / Requirement": "Providers MUST identify a set of information resources to assess for FedRAMP authorization that includes all information resources that are likely to handle federal customer data or likely to impact the confidentiality, integrity, or availability of federal customer data handled by the cloud service offering.",
  "Automation Capability": "Inventory scripts",
  "Assessor Overview": "Inventory scripts are utilized within the Cloud Service Offering to identify resources that are in scope for the assessment.",
  "Gaps": "The scripts that are used do not pull all relevant resources from the IaaS Provider.",
  "Applicability (Impact Levels)": "Low, Moderate, High"
}
```

Sincerely,

Jorden Foster
 Senior Director
 FedRAMP Assessment Services
 Coalfire Systems, Inc.