

Continuous Monitoring and Improvement Guide

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Table of Contents

Continuous Monitoring and Improvement Guide..... 1

1. Purpose 2

2. Roles and Responsibilities..... 3

 2.1 Service Provider 3

 2.2 GovRAMP Program Management Office (PMO) 3

 2.3 SLED Authorizing Body..... 3

 2.4 Third Party Assessment Organization (3PAO)..... 4

 2.5 Standards and Technical Committee..... 4

 2.6 Continuous Monitoring 5

 2.7 Continuous Monitoring Process 6

 2.8 GovRAMP PMO Monthly Review Process..... 7

 2.9 Annual Activities 9

 2.9.1 SP Annual Activities..... 9

 2.9.1 3PAO Annual Activities 10

Document Revision History

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4/22/2022	Update to reference GovRAMP Continuous Monitoring Performance Guide and other minor edits	1.5	GovRAMP Standards & Technical Committee
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11/29/2023	Revised language to reflect GovRAMP verified statuses, minor edits to Sections 3.6(1.,5.) added access rights review for GovRAMP document portal; Section 3.7(5. a),	1.6	GovRAMP Standards & Technical Committee
11/30/2023	Adopted	1.6	GovRAMP Board of Directors



9/20/2024	Revised language to provide clarity around payment requirements and updated Provisional status to Provisionally Authorized status.	1.7	GovRAMP Board of Directors
2/18/2026	Updated to reflect change from StateRAMP to GovRAMP	1.8	GovRAMP Staff

This document will be reviewed at the discretion of the GovRAMP Board at a frequency of no less than annually.

1. Purpose

Continuous monitoring review procedures outline the process to examine each monthly continuous monitoring package submission. The terms continuous and ongoing imply that organizations assess and analyze security controls and information security related risks at a frequency sufficient to support organizational risk-based decisions.

Monitoring security controls is part of the overall risk management framework for information security and the Service Provider (SP) is required to maintain a security authorization that meets StateRAMP, Inc. dba GovRAMP (GovRAMP) requirements. Performing ongoing security assessments determines whether the set of deployed security controls in a cloud system remains effective considering new exploits and attacks and planned and unplanned changes that occur in the system and its environment over time.

To maintain an authorization that meets GovRAMP requirements, the SP must monitor their security controls, assess them on a regular basis, and demonstrate that the security posture of their service offering is continuously acceptable.

Ongoing assessment of security controls results in greater control over the security posture of the SP's system and enables timely risk-management decisions. Security-related information collected through continuous monitoring is used to make recurring updates to the security assessment package.

Ongoing due diligence and review of security controls enables the security authorization package to remain current which allows state and local governments the ability to make informed risk management decisions as they use cloud solutions.



2. Roles and Responsibilities

2.1 Service Provider

When an SP has achieved one of the three GovRAMP verified statuses, the SP's security posture is monitored according to the assessment and authorization process. It is the responsibility of the service provider to partner with a GovRAMP certified third party assessment organization (3PAO) to allow for required monitoring requirements.

2.2 GovRAMP Program Management Office (PMO)

GovRAMP oversees and conducts analysis on the service provider's continuous monitoring activities and provides information and may advise the State Authorizing Body, who maintains the responsibility on behalf of the State for continuous monitoring in relation to their contract.

2.3 SLED Authorizing Body

SLED refers to state or local government or higher education bodies contracting with SPs who provide and/or use a SaaS (Software-as-a-Service), PaaS (Platform-as-a-Service), or IaaS (Infrastructure-as-a-Service) solution involving the storage, processing, and/or transmitting of government data including PII (Personally Identifiable Information), PHI (Protected Health Information), and/or PCI (Payment Card Industry).

The SLED Authorizing Body manages the review and approval of all continuous monitoring artifacts submitted by the service provider on behalf of the SLED entity. The SLED entity must review all security artifacts provided by the SP, 3PAO, or GovRAMP PMO to ensure the SP's security posture meets requirements for the SLED entity's use of the system.

SLED Authorizing Bodies should ensure their organization is monitoring the Plan of Action & Milestones (POA&M) and reporting artifacts as well as any significant changes associated with the SP's service offering. SLED entities should use this information to make risk-based decisions about ongoing authorization of the system.

2.4 Third Party Assessment Organization (3PAO)

3PAOs are responsible for independently verifying and validating the control implementation and test results for service providers for continuous monitoring. 3PAOs are responsible for:

- Submitting an assessment report to GovRAMP one year after the SP's authorization date and each year thereafter
- Performing announced penetration testing annually



- Performing annual scans of web applications, databases, and operating systems
- Assessing change controls on an ad hoc basis as requested by GovRAMP or the SLED Authorizing Body for any changes made to the system by the service provider.
- Conducting an annual review of subset of 1/3 security controls.

To be effective in this role, 3PAOs are responsible for ensuring that the chain of custody is maintained for any 3PAO-authored documentation. 3PAOs must also be able to vouch for the veracity and integrity of data provided by the SP for inclusion in 3PAO-authored documentation.

- If scans are performed by the SP, the 3PAO must either be on-site and observe the SP performing the scans or be able to monitor or verify the results of the scans through other means documented and approved by the SLED Authorizing Body.

2.5 Standards and Technical Committee

As outlined in the GovRAMP Bylaws Article VI Section 9, the Standards and Technical Committee will consult the GovRAMP PMO on policies, security standards, etc. This committee will have the following responsibilities regarding continuous monitoring:

- Reviewing policy framework for continuous monitoring and security artifacts on a regular basis
- Setting minimum requirements for the PMO to provide the SLED Authorizing Body with a regularly scheduled summary reporting of the SP's continuous monitoring statuses and changes.
- Ensuring the GovRAMP PMO is providing artifacts to all relevant SLED authorizing bodies in a timely manner.

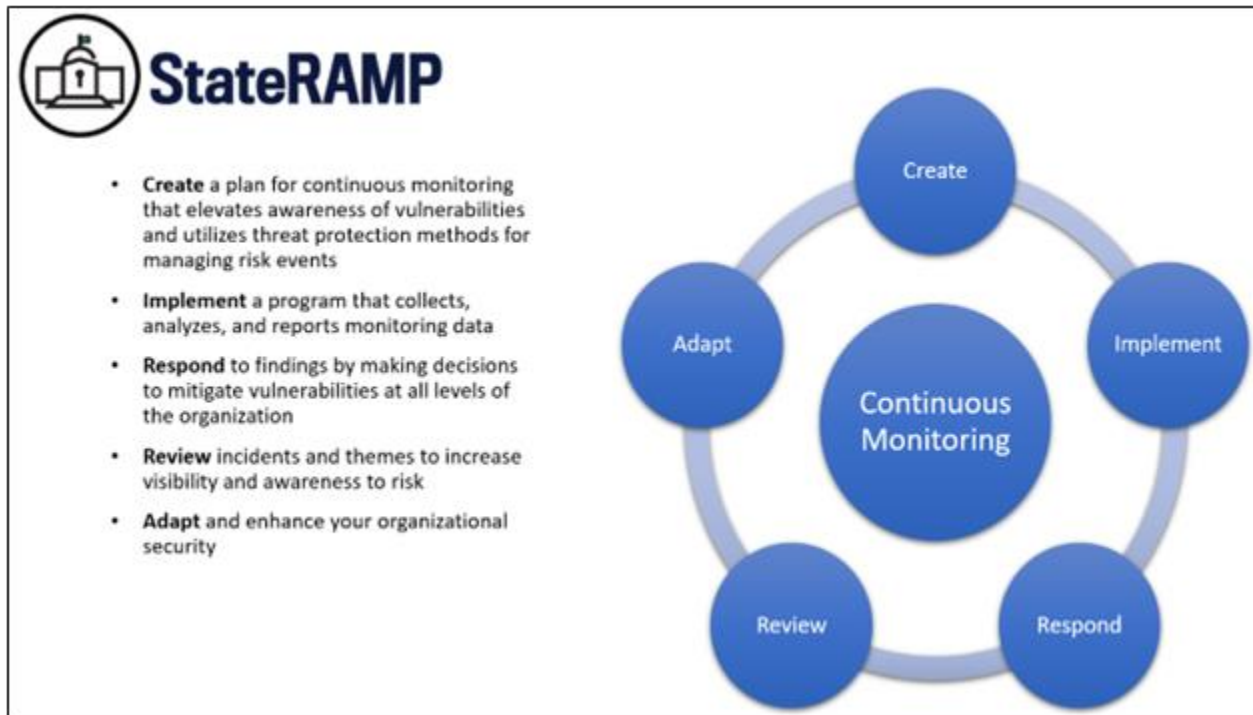
GovRAMP Standards and Framework will undergo periodic and regular review to address current trends and concerns in cybersecurity. Notice will be provided with a reasonable timeframe for implementation.

2.6 Continuous Monitoring

The GovRAMP continuous monitoring program is based on the continuous monitoring process described in NIST SP 800-137, *Information Security Continuous Monitoring for Federal Information Systems and Organization*, and the *FedRAMP Continuous Monitoring Strategy Guide* in the [FedRAMP documentation assets](#). GovRAMP has attempted to create a process that will meet the diverse needs of state and local governments, and higher education institutions.



Figure 1



GovRAMP recognizes that cybersecurity verification is not a “one size fits all” implementation. Therefore, to meet SLED-specific needs, the GovRAMP PMO will partner with the SLED Authorizing Body, SP, 3PAO, and the GovRAMP Board to make reasonable accommodations, recommendations, and/or modifications to the standard GovRAMP continuous monitoring processes. Figure 1 provides a visual representation of the continuous monitoring process cycle.

Upon obtaining a Ready, Authorized, or Provisionally Authorized Status, the SP is required to maintain a continuous monitoring program. The SP is required to deliver the documentation outlined below. The GovRAMP PMO will review and analyze the service provider’s continuous monitoring deliverables. This process is required for SPs to retain their Ready, Provisionally Authorized or Authorized Status. Failure to implement or comply with the continuous monitoring activities can result in a change or loss of the Ready or Authorized Status.

2.7 Continuous Monitoring Process

1. Continuous monitoring begins when a service provider obtains one of the three GovRAMP verified statuses. The SP is responsible for making timely payments to the PMO as agreed upon in the Continuous Monitoring Agreement executed by both parties.



2. The SP will partner with the 3PAO to create a continuous monitoring plan that meets the minimum GovRAMP continuous monitoring standards, including all specific requirements provided by the SLED Authorizing Body.
3. The SP is responsible for implementing the continuous monitoring plan as agreed upon by GovRAMP and the SLED Authorizing Body. As outlined in this document, the SP will send the GovRAMP PMO all continuous monitoring and significant change artifacts at the specified intervals.
 - a. SP submits all monthly reporting materials.
 - b. SP reviews and confirms access rights monthly for their own staff to the GovRAMP document repository. Access changes are reported to pmo-GovRAMP@knowledgeservices.com.
 - c. The 3PAO submits all annual documentation and all penetration testing reports.
4. The GovRAMP PMO analyzes all submitted artifacts, reviews the ConMon Executive Summary, and records a satisfactory or needs improvement review.
 - a. The GovRAMP PMO will provide the SLED Authorizing Body access to view and approve the SP's reporting and all the GovRAMP PMO's analysis.
 - b. The SLED Authorizing Body may request raw evidence from the SP or 3PAO to review.
5. The SLED Authorizing Body reviews the SP's continuous monitoring artifacts, including the executive summary.
 - a. If any party is not satisfied with the findings, the SLED Authorizing Body, the GovRAMP PMO, and the SP will meet to define corrective actions which will be incorporated into the POA&M.
 - b. Additional continuous monitoring requirements are at the discretion of the SLED Authorizing Body.
 - c. SLED Authorizing Body approves all continuous monitoring documentation.
 - d. Any concerns by the SLED entity will be addressed on a case-by-case basis and could affect the authorization status.
6. The GovRAMP PMO updates the SP's public profile with documentation and most recent SLED entity approval as needed.



2.8 GovRAMP PMO Monthly Review Process

1. The SP must provide monthly vulnerability and compliance scans (in a CSV or similar format), along with raw results and complete the ConMon executive summary report to the GovRAMP PMO.
2. The SP must mitigate all discovered high-risk vulnerabilities within 30 days, moderate-risk vulnerabilities within 90 days, and low-risk vulnerabilities within 180 days.
3. The SP with Low or Moderate security category will upload the following monthly documents to the GovRAMP document repository:
 - a. POA&Ms (Plan of Action and Milestones)
 - b. An updated inventory workbook
 - c. OS, DB, and web application vulnerability scans
 - d. Compliance scan results
 - i. Compliance scanning focuses on the configuration settings (or security hardening) being applied to a system. Compliance scans assess adherence to a specific compliance framework.
 - e. Risk Adjustments
 - f. Operational Requirements
 - g. False Positives
 - h. An overall executive summary of the above items
4. The SP with high-risk systems is solely responsible for conducting the following activities as stated above. The GovRAMP PMO will coordinate a monthly review process with the SP that will meet the security requirements set forth by the information system.
5. The GovRAMP PMO will review the submitted documentation. To facilitate a successful review, the following requirements must be met.
 - a. The POA&Ms must account for past due vulnerabilities.
 - b. POA&Ms must be remediated within the required timeframes, and evidence of the remediation must be provided.
 - c. Past due POA&Ms must include justification with supporting evidence.



- d. All scans must include all inventory components.
 - e. Any Risk Adjustments must be accompanied by rationale.
 - f. False Positives and Operational Requirements must be clearly documented.
6. Findings because of the GovRAMP PMO's review of the monthly documentation may trigger a greater frequency of continuous monitoring activities, as well as impromptu requests for evidence regarding the most recent assessment.
 7. Failure to comply with the agreed upon continuous monitoring plan and requirements may result in corrective action or revocation of the verified security status.
 8. The GovRAMP PMO or the SLED Authorizing Body may require that additional controls be added to the annual 3PAO assessment based on the SP's continuous monitoring activity.

2.9 Annual Activities

The following activities must take place annually for the SP to retain their verified status and remain in good standing with the GovRAMP PMO and the SLED Authorizing Body.

2.9.1 SP Annual Activities

The SP is solely responsible for conducting the following activities on an annual basis:

1. Review and update the information security policies and procedures.
 - a) Policies and procedures for high-risk systems must be reviewed and updated annually.
 - b) For moderate and low-risk systems, the SP must review procedures annually and review policies every three years.
 - c) The SP must insert the updated policy document as an attachment to the GovRAMP System Security Plan (SR-SSP) and submit the updated plan to the GovRAMP PMO one year after the initial authorization date and each year thereafter.
2. SPs must contract with a 3PAO to assess a subset of their security controls.
 - a) The 3PAO will determine which subset of controls are to be assessed, with approximately one-third of controls reviewed annually, with all controls reviewed every three years.



- b) The GovRAMP PMO and/or SLED Authorizing Body may require specific security controls for annual review.
 - c) All assessment reports must be submitted to the GovRAMP PMO.
3. SPs must conduct penetration testing to ensure compliance with all vulnerability mitigation procedures.
- a) Penetration testing must be performed by a 3PAO, and all penetration testing reports must be sent to the GovRAMP PMO.
 - b) Additional penetration testing is required when the SP has made a significant change in their product.
 - i. In the case of a significant change, the SP shall report a self-attestation of penetration testing focused on the specific change.
 - ii. Unless required by the State Authorizing Body, this testing does not have to be conducted by a 3PAO but shall be included in the required annual testing by the 3PAO.
4. The Configuration Management Plan must be reviewed, updated, and submitted to the GovRAMP PMO.
5. The IT Contingency Plan must be reviewed and updated and submitted to the GovRAMP PMO.
6. An Incident Response Plan test must be conducted, and the corresponding Incident Response Plan must be reviewed and updated.
- a) Record the results of the incident response testing in the SR-SSP in the appropriate control description field indicating when the testing took place, testing materials, who participated, and who conducted the testing.
 - b) Insert the updated Incident Response Plan as an attachment to the SR-SSP.
7. The SR-SSP must be reviewed, updated, and submitted to the GovRAMP PMO. SP must also submit payment for the annual review in accordance with the Continuous Monitoring Agreement executed by both parties.

2.9.1 3PAO Annual Activities

The 3PAO is solely responsible for conducting the following activities on an annual basis:



1. The development of a Security Assessment Plan (SAP) that describes the scope of the assessment includes:
 - a) Security controls and control enhancements under assessment
 - b) Assessment procedures to be used to determine security control effectiveness
 - c) Assessment environment, assessment team, and assessment roles and responsibilities
2. Assessing the security controls in the SP's information system and its environment of operation to determine the extent to which the controls are implemented correctly, operating as intended, and producing the desired outcome with respect to meeting established security requirements.
 - a) Security control assessments include in-depth monitoring, vulnerability scanning, malicious user testing, and insider threat assessment.
 - b) Security control assessments for performance and load testing must occur once every three years unless the SLED Authorizing Body specifically requires more frequent testing.
3. Providing a report of vulnerability and compliance scanning to the SP and the GovRAMP PMO.
4. Producing a security assessment summary that documents the results of the assessment.
5. Providing the results of the security control assessment to the GovRAMP PMO.
 - a) The 3PAO submits all annual documentation and all penetration testing reports.