

Progressing Snapshot Program Requirements and Progressing Improvement Guide

March 2026



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Document Revision History

Date	Description	Version	Author
7/18/2025	Original Publication	1.0	GovRAMP Standards & Technical Committee
9/3/2025	Adopted	1.0	GovRAMP Board of Directors
1/1/2026	Effective Date	1.0	Effective Date
3/11/2026	Branding Update	1.1	GovRAMP Staff



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

1. Purpose

The GovRAMP Progressing Security Snapshot Program is an ongoing security maturity assessment for cloud products. The Progressing Security Snapshot Program helps service providers begin their GovRAMP cybersecurity journey while offering governments an initial level of insight into the risk maturity of suppliers' cloud products on an ongoing basis. Enrollment in the Progressing Snapshot program includes quarterly assessments (Snapshots) and monthly, hour-long advisory calls with the PMO Advisory Team.

Service providers gain insight into their products' gaps in achieving NIST-based security controls and guidance on how to best address those gaps, with a focus on what matters most for improved security outcomes. The criteria were designed to provide an analysis that validates a product's current maturity beginning with the top 40 most impactful controls, based on the GovRAMP Ready baselines at a Moderate impact level, as determined by the MITRE ATT&CK® Framework, while also allowing a Cloud Service Provider to continue their cyber security maturity journey to their desired verification status of GovRAMP Core, Ready, Provisionally Authorized, or Authorized.

Progressing Improvement review procedures outline the process to examine each quarterly snapshot artifact package submission. The terms progressing 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 posture that meets 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 enrollment in the Progressing Security Snapshot Program, the SP must maintain and 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 the SP's security controls enables the Progressing Snapshot artifacts and purview 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 a Service Provider (SP) has enrolled in the Progressing Snapshot Program, the SP's security posture is reviewed on a quarterly basis with the completion of a new GovRAMP Security Snapshot. It is the responsibility of the SP to submit all their artifacts for review within a timely manner for each quarterly review to allow for the PMO to complete its review process, typically at least 7 days prior to the Snapshot due date.

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 Oversight Body, who maintains the responsibility on behalf of the State for Snapshot monitoring in relation to their contract.

2.3 SLED Oversight 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 Oversight Body manages the review and approval of all Snapshot artifacts submitted by the service provider on behalf of the SLED entity. The SLED entity may request the quarterly Snapshot Matrix and Score from the SP through the GovRAMP request process to ensure the SP's security posture meets requirements for the SLED entity's use of the system. SLED Oversight Bodies should ensure their organization is monitoring the quarterly progressing improvement documents, 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 use of the system.

2.4 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 progressing improvement 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.

2.5 Comprehensive Program Requirements

As part of the GovRAMP Progressing Snapshot Program, the GovRAMP Standards and Technical committee sets the program requirements, including how and when a product is added to the Progressing Product List, as well as what actions impact program enrollment.

Program Participation – Initial Listing on Progressing Product List

- Products must have a non-zero score before being listed on Progressing Product List (PPL).
- Until a product is listed on the PPL, it will not be reported to Government's as being actively engaged in the program.
- Once the product is listed on the Progressing Product List, the date the product was enrolled in the Progressing Snapshot Program shall be displayed.
 - The date of the product's most recent Snapshot will also be displayed.



Program Participation – Perfect Score

- Progressing Snapshot is not a terminal status and achieving a terminal status of Core, Ready, Provisionally Authorized, or Authorized should be the CSP's goal.
- While it is not required, it is best practice and thus recommended that once a product achieves a 100% Snapshot score, that the SP works toward achieving a higher status (Core, Ready, Provisionally Authorized, or Authorized) to migrate the product from the PPL to the Authorized Product List (APL).

Evidence Refresh Requirement

- All artifacts must be refreshed if older than 12 Months.

Snapshot Delivery Schedule

- A product must have a new snapshot every quarter and, once on the PPL, must be willing to review Governments' requests for Progressing Improvement document access.
- To remain in a "Progressing" status in the Progressing Snapshot Program, a product must complete a new Snapshot every quarter, even after achieving a perfect score.

Snapshot Lifespan

- The Progressing Snapshot score will remain valid for one year from issue date unless a new Snapshot score is issued.

Program Non-Compliance

There are several deficiencies which will cause a product to be non-compliant with the Progressing Snapshot Program Requirements. In those situations, a product shall either be removed from the Progressing Snapshot Program or will be noted as "Not Progressing" on the product's listing on the PPL. Those events are detailed below:

- **Non-Compliant Events** are events that qualify for removal from the program.
 - SP fails to comply with the terms of their contractual agreement, including failure to pay the required fees.
- **Remediation Events** are events that trigger the Progressing Improvement escalation process found here.
 - Two consecutive Snapshot scores are identical in score
 - Exceptions:
 - Advisor can attest, in writing to PMO Director, to improvements not yet reflected
 - Snapshot score is >95%.
 - SP fails to update their artifacts to ensure they are less than 12 months old.



- Product experiences a reduction in quarterly Snapshot score.

Program Withdrawal

- Should an SP choose to remove their product from the Progressing Snapshot Program, the product will immediately be removed from the PPL and any Governments with access to the Progressing Improvement packages for those products shall be notified of the product's withdrawal.
 - However, if the product is being withdrawn from the Progressing Snapshot Program because it has achieved a verified status (Core, Ready, Provisionally Authorized, or Authorized) the provider may choose to remain on the PPL until the verified status is awarded.
 - If the product remains on the PPL until the award of a verified status, governments who have access to the Progressing Improvement packages for those products will not be notified of the product's withdrawal and instead will be notified that the product has advanced to a verified status.

2.6 Progressing Improvement

The GovRAMP progressing improvement program is akin to the continuous monitoring process described in NIST SP 800-137, Information Security Continuous Monitoring for Federal Information Systems and Organization. However, for the purposes of the Progressing Snapshot Program, progressing improvement shall consist of quarterly Snapshots and associated artifacts. GovRAMP has created a process that meets the diverse needs of state and local governments, and higher education institutions.

Upon enrollment in the GovRAMP Progressing Snapshot Program, the SP is required to progressively improve their Snapshot score every quarter. The GovRAMP PMO will review and analyze the service provider's progressing improvement artifacts and provide a Snapshot Score. This process is required for SPs to retain their status on the Progressing Product List. Failure to comply with the Progressing Improvement requirements can result in a change or loss of enrollment in the Progressing Snapshot Program.

2.7 Progressing Improvement Process

1. Progressing Improvement begins when a service provider completes their first GovRAMP Snapshot. The SP is responsible for making timely payments to the PMO as agreed upon in the GovRAMP Progressing Snapshot Agreement executed by both parties.



2. The SP will partner with the PMO Advisory Team to engage in monthly advisory calls.
3. The SP is responsible for implementing the updates discussed in those monthly meetings to advance their Quarterly Snapshot Scores. As outlined in this document, the SP will send the GovRAMP PMO all artifacts necessary to issue a quarterly Snapshot score.
 - a. SP submits all quarterly artifacts; these artifacts must be updated at minimum annually to remain in compliance with program requirements.
 - b. SP reviews and confirms access rights quarterly for their own staff to the GovRAMP document repository. Access changes are reported to pmo@govramp.org.
4. The GovRAMP PMO analyzes all submitted artifacts and issues a new quarterly Snapshot score.
 - a. The GovRAMP PMO will provide the SLED Authorizing Body access to view the SP's Snapshot score, as well as the GovRAMP PMO's analysis, including the GovRAMP Advisor's SP engagement summary.
 - b. The SLED Authorizing Body may request the SP's Progressing Improvement documents, to include Progressing Snapshot Matrix and the GovRAMP Advisor's engagement summary.
5. The GovRAMP PMO updates the SP's public profile with documentation on the PPL.

2.8 GovRAMP PMO Quarterly Snapshot Process

1. The SP must provide quarterly artifacts to the GovRAMP PMO. Information on what documents should be provided can be found [HERE](#).
2. The GovRAMP PMO will review the submitted documentation and issue a Snapshot score.
3. Failure to comply with quarterly snapshots shall result in actions outlined in the Progressing Improvement escalation process or unenrollment from the Progressing Snapshot Program.