

# 2025 ANNUAL REVIEW



In 2025, the Cloud Service Providers Advisory Board (CSP-AB) strengthened its role as the trusted voice of cloud service providers to Federal policy makers regarding cybersecurity standards and practices. Through coordinated engagement and sustained dialogue with key stakeholders, the CSP-AB delivered high-impact outcomes for its members. The year marked growth from ongoing consultation to shaping FedRAMP policy and frameworks during a time of rapid change leading to: improving the clarity of standards, shaping how those standards are interpreted and assessed in practice, and equipping members to implement them with confidence.

## Policy and Standards Impact

Supporting members through the introduction and evolution of FedRAMP 20x was a core priority for 2025. Overall, CSP-AB coordinated responses to **10 FedRAMP Requests for Comment (RFCs)**, submitting a total of **39 formal comments**. These contributions focused on improving clarity, reducing unintended operational friction, and aligning standards with modern, automated cloud environments.

Breakdown of submissions:

### 7 Language Updates

All proposed changes resulted in revised wording in the standard, improving precision, and interpretability.

### 17 Clarification Requests

Approximately half were reflected directly in updated standards or guidance. The remainder were addressed through FedRAMP's stated principle of outcome-focused flexibility rather than prescriptive implementation.

### 15 Conceptual Proposals

Addressed risk analysis, vulnerability management, and continuous monitoring under the 20x model.

## Strategic Collaboration and Process Improvement

CSP-AB engaged with FedRAMP to gain clarity on how FedRAMP 20x will operate in practice, particularly around risk analysis and vulnerability management. FedRAMP provided valuable insight leading members to change their approach to compliance architecture and operational design to align with several aspects of 20x approach, such as:



Automated remediation is expected to eliminate low-risk "noise".



Persistent high and moderate findings should be rare.



Legacy vulnerability backlog models are not aligned with the intent of FedRAMP 20x.

## DoW

Alongside FedRAMP, the CSP-AB continues to prioritize DoW as a key focus area and will continue to expand engagement on this topic. In 2025, CSP-AB members met with DoW leadership to discuss issues regarding the Department's authorization process. We will build on this engagement in 2026 and continue to work with DoW officials to ensure warfighters have timely access to the most secure and capable technologies available.

## Member Growth and Engagement

The CSP-AB continued to grow in both membership and participation during 2025. We welcomed six new members:



By year-end, the **CSP-AB** comprised **22 member organizations**, with approximately **120 active participants** contributing across consultations, working sessions, and collaborative forums. The group also continued its successful program of monthly Practitioner meetings, and 6 monthly in-person summits. To support deeper engagement and faster coordination, the CSP-AB also launched:



**A dedicated member Slack workspace** for real-time collaboration and peer support.



**A weekly member email** providing updates on RFCs, government engagement, working group activity, and upcoming priorities.



**An updated website** featuring a member document repository, an events page and updated news articles.



**Weekly working group meetings** to discuss events, standards releases, share information, and discuss the latest information and happenings with FR and DoW.



**Monthly all-member meetings** to align on policy developments, share implementation experiences, and coordinate collective positions.



**Regular in-person sessions**, complemented by written summaries, to deepen technical discussion and ensure insights were accessible to the full membership.



### CSP-AB Inaugural Summit

On November 6 2025, the CSP-AB hosted its inaugural in-person summit, bringing together cloud providers, practitioners, and policy stakeholders. Our event featured **17 speakers from 14 different firms**, and we hosted **210 industry attendees** at AWS HQ2 in Arlington. The event reinforced the CSP-AB's role as a forum for technically informed, policy-relevant discussion on federal cloud security and authorization.

### Looking Ahead

The CSP-AB's 2025 activities demonstrated that coordinated, credible, and technically-grounded industry engagement can improve both the clarity and practical effectiveness of federal cloud standards.

By combining policy engagement, practitioner insight, and sustained collaboration, the CSP-AB delivered value that extended well beyond formal consultation responses.

The organization enters 2026 with a stronger member base, deeper external relationships, and a proven model for constructive engagement.

