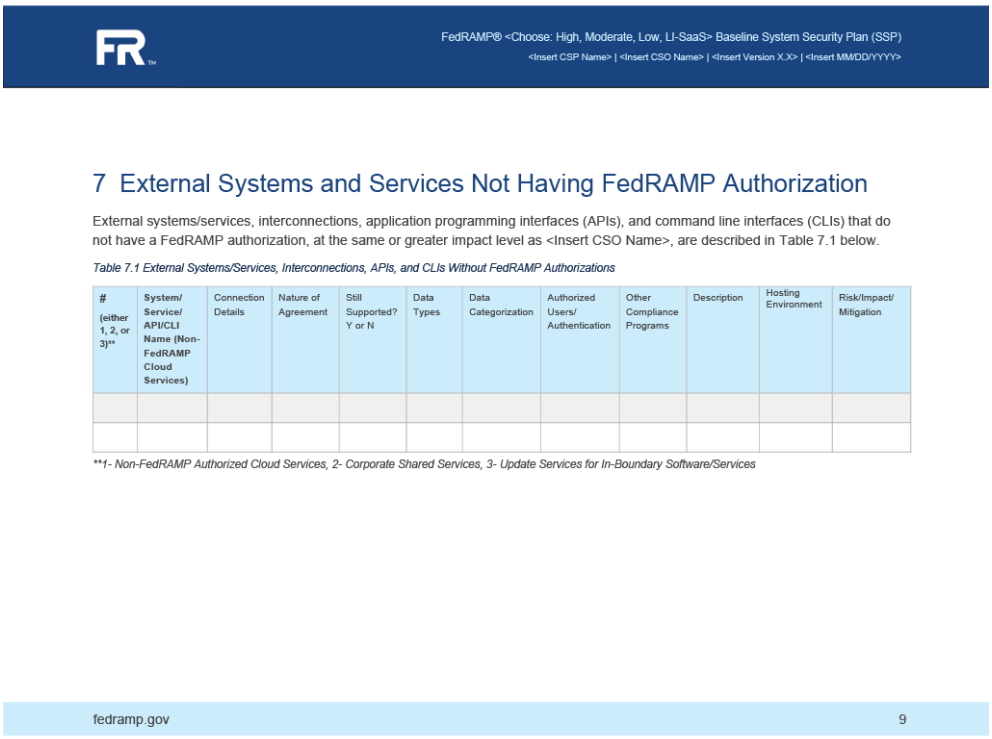
7. External Systems and Services Not Having FedRAMP Authorization

FedRAMP authorized services should be used, whenever possible, since their risk is defined. However, there are instances where CSOs have external systems or services that are not FedRAMP authorized. In OSCAL, these external systems and services must be identified using `component` assemblies with additional FedRAMP namespace and class properties as shown in the OSCAL representation below.



FedRAMP® <Choose: High, Moderate, Low, LI-SaaS> Baseline System Security Plan (SSP)

<Insert CSP Name> | <Insert CSO Name> | <Insert Version X.X> | <Insert MM/DD/YYYY>

7 External Systems and Services Not Having FedRAMP Authorization

External systems/services, interconnections, application programming interfaces (APIs), and command line interfaces (CLIs) that do not have a FedRAMP authorization, at the same or greater impact level as <Insert CSO Name>, are described in Table 7.1 below.

Table 7.1 External Systems/Services, Interconnections, APIs, and CLIs Without FedRAMP Authorizations

# (either 1, 2, or 3)**	System/ Service/ API/CLI Name (Non-FedRAMP Cloud Services)	Connection Details	Nature of Agreement	Still Supported? Y or N	Data Types	Data Categorization	Authorized Users/ Authentication	Other Compliance Programs	Description	Hosting Environment	Risk/Impact/ Mitigation

***1- Non-FedRAMP Authorized Cloud Services, 2- Corporate Shared Services, 3- Update Services for In-Boundary Software/Services*

fedramp.gov 9

OSCAL Representation

```
system-security-plan:
  system-implementation:
    component:
      uuid: 11111111-2222-4000-8000-009000200001
      type: interconnection
      title: "[EXAMPLE]External System / Service Name"
      description: "Briefly describe the interconnection details."
      prop:
        - ns: "https://fedramp.gov/ns/oscal"
          name: service-processor
          value: "[SAMPLE] Telco Name"
```

```
    - ns: "https://fedramp.gov/ns/oscal"
      name: interconnection-type
      value: "1"
    - name: direction
      value: incoming
    - name: direction
      value: outgoing
    - ns: "https://fedramp.gov/ns/oscal"
      name: nature-of-agreement
      value: contract
    - ns: "https://fedramp.gov/ns/oscal"
      name: still-supported
      value: yes
    - ns: "https://fedramp.gov/ns/oscal"
      class: fedramp
      name: interconnection-data-type
      value: "C.3.5.1"
    - ns: "https://fedramp.gov/ns/oscal"
      class: fedramp
      name: interconnection-data-type
      value: "C.3.5.8"
    - ns: "https://fedramp.gov/ns/oscal"
      class: "C.3.5.1"
      name: interconnection-data-categorization
      value: low
    - ns: "https://fedramp.gov/ns/oscal"
      class: "C.3.5.8"
      name: interconnection-data-categorization
      value: moderate
    - ns: "https://fedramp.gov/ns/oscal"
      name: authorized-users
      value: "SecOps engineers"
    - ns: "https://fedramp.gov/ns/oscal"
      class: fedramp
      name: interconnection-compliance
      value: "PCI SOC 2"
    - ns: "https://fedramp.gov/ns/oscal"
      class: fedramp
      name: interconnection-compliance
      value: "ISO/IEC 27001"
```

```
      - ns: "https://fedramp.gov/ns/oscal"
        name: interconnection-hosting-environment
        value: PaaS
      - ns: "https://fedramp.gov/ns/oscal"
        name: interconnection-risk
        value: None
      - name: isa-title
        value: "system interconnection agreement"
      - name: isa-date
        value: "2023-01-01T00:00:00Z"
      - name: ipv4-address
        class: local
        value: "10.1.1.1"
      - name: ipv4-address
        class: remote
        value: "10.2.2.2"
      - name: ipv6-address
        value: "::ffff:10.2.2.2"
      - ns: "https://fedramp.gov/ns/oscal"
        name: information
        value: "Describe the information being transmitted."
      - ns: "https://fedramp.gov/ns/oscal"
        name: port
        class: remote
        value: "80"
      - ns: "https://fedramp.gov/ns/oscal"
        name: interconnection-security
        value: ipsec
        link:
          - href: "#uuid-of-ICA-resource-in-back-matter"
            rel: isa-agreement
back-matter:
  resource:
    uuid: "11111111-2222-4000-8000-001000000050"
    title: "[SAMPLE]Interconnection Security Agreement Title"
    props:
    - name: published
      value: '2023-01-01T00:00:00Z'
    - name: version
      value: Document Version
```

```
    - name: type
      value: agreement
      class: interconnection-security-agreement
    rlinks:
    - href: ./attachments/ISAs/ISA-1.docx
```

External System and Services

To map the legacy FedRAMP SSP table for **External Systems and Services** into a machine-readable OSCAL format, the data is primarily stored within the `system-implementation` section, specifically under `component` definitions where the `type` is set to `interconnection`.

The following data points are captured using various OSCAL fields and FedRAMP-specific properties (`prop`):

- **Identity & Nature:** The system, service, or API name is defined by the component `title`, while the specific `interconnection-type` (e.g., dedicated line, VPN) and the `nature-of-agreement` (e.g., MOU, ISA) are captured as properties.
- **Operational Details:** Connection characteristics are recorded via properties for `direction` (inbound/outbound), whether the service is `still-supported` (Y/N), and a general `description` of the interface.
- **Data Characteristics:** The `data-type` and its associated `data-categorization` (Security Impact Level) are explicitly defined to track what information is leaving or entering the boundary.
- **User Access:** Information regarding `authorized-users` and their specific `privilege-level` is linked back to the `user` definitions within the system implementation.
- **Compliance & Risk:** Any `other-compliance-programs` (like SOC2 or ISO), the specific `hosting-environment`, and a summary of the `risk-impact-mitigation` strategies are all stored as specific metadata properties attached to the interconnection component.

When documenting multiple external services, each service is treated as a separate instance of an interconnection component within the OSCAL file.

Revision #7
Created 2026-02-11 22:58:45 UTC by Brian Ruf
Updated 2026-04-07 16:33:20 UTC by Rene M. Tshiteya