

Reports

- [Comments Summary](#)

Comments Summary

Generated: 2026-10-06 00:00:14 · 6 open · 19 archived · 0 in recycle bin

CONTENTS

Open Comments (6)

Core OSCAL

System Security Plans

Legacy FedRAMP

Supporting Resources and Valid Content

Legacy FedRAMP System Security Plan (SSP)

Archived Comments (19)

Legacy FedRAMP

FedRAMP Common

Legacy FedRAMP System Security Plan (SSP)

Open Comments 6

Core OSCAL

System Security Plans

Components 1 open · 0 archived		
OPEN COMMENTS		
# 1	Brian Ruf 2026-04-15 14:45:23	OPEN
Needs work		

Legacy FedRAMP

Supporting Resources and Valid Content

Baselines 1 open · 2 archived

OPEN COMMENTS

3 **Brian Ruf** 2026-02-25 13:16:08 **OPEN**

In the TFG meeting, highlighted the need to verify FedRAMP has not changed the baselines since these were drafted in Jan 2025.

ARCHIVED COMMENTS

2 **Brian Ruf** 2026-02-25 13:15:28 (edited 2026-04-02 15:20:44) **ARCHIVED**

In the TFG meeting we discussed putting more content at the top to clarify tools should be using the profiles and performing the resolution themselves. Tools may cache as appropriate depending on frequency of updates to these profiles and any overlays. @Brian Ruf taking action to draft content.

Clarify this is important to ensure baselines remain fresh.

5 **Brian Ruf** 2026-04-02 15:20:40

This is complete.

1 **Valinder Mangat** 2026-02-18 20:49:21 (edited 2026-04-13 19:05:24) **ARCHIVED**

The SSP OSCAL guidance for “import-profile” specifically discourages the use of a “resolved profile catalog” for good reasons.

It makes sense to create the “tailoring-profile” and have the other profiles pull from the tailoring-profile, while this approach is useful from authoring effort perspective, it adds runtime burden for having to resolve multiple layers of profiles.

Is there an approach to resolve “multiple stacked profiles” into single profiles so that they can be referenced directly in the SSP?

The baselines are not likely to change very often, so perhaps a more efficient runtime solution bears better.

4 **Brian Ruf** 2026-04-02 15:20:29

While I completely agree that multi-layer profile resolution is the preferred approach and the only way to handle overlays and multi-frameworks, we are looking to initially reduce complexity to the greatest degree practical for MVP/Core adoption, then allow organizations to mature their capabilities over time based on their needs and priorities.

6 **Brian Ruf** 2026-04-08 12:35:04

Discussed in today's TFG. We agree that that resolved profiles allow an easy quick-start. Verified that we show it initially in the adoption and moving to proper profile processing by the "Normalized" phase.. Considering this closed.

Examples 1 open · 0 archived

OPEN COMMENTS

1 **Brian Ruf** 2026-02-25 13:19:06 (edited 2026-04-08 14:32:29) **OPEN**

Needs end-to-end review for alignment with FedRAMP templates and defined OSCAL patterns.

Legacy FedRAMP System Security Plan (SSP)

6. Leveraged FedRAMP-Authorized Services 1 open · 0 archived

OPEN COMMENTS

1 **Brian Ruf** 2026-04-01 03:58:56 **OPEN**

We need to fix the link in the "Important for Leveraged Systems" callout once the controls section is complete and the location is not likely to change again.

Control Origination 1 open · 0 archived

OPEN COMMENTS

1 **Brian Ruf** 2026-04-15 03:24:29 **OPEN**

This page needs work and the concept needs to be re-evaluated, especially use of the FedRAMP extension.

2 **Brian Ruf** 2026-04-15 12:27:25

In TFG meeting we agree that:

- We favor aggregation, but must be clear about HOW to aggregate.
- We also need to cover override/exception indicators.

Implementaiton Status 1 open · 0 archived

OPEN COMMENTS

1 **Brian Ruf** 2026-04-15 03:23:26 **OPEN**

This page requires more analysis and the associated FedRAMP extension should be carefully re-considered.

2 **Brian Ruf** 2026-04-15 12:27:11

In TFG meeting we agree that:

- We favor aggregation, but must be clear about HOW to aggregate.
- We also need to cover override/exception indicators.

Archived Comments 19

Legacy FedRAMP

FedRAMP Common

Roles 0 open · 1 archived

ARCHIVED COMMENTS

1 **Erik Cass** 2026-03-17 16:28:16 (edited 2026-04-08 14:32:43) **ARCHIVED**

According to the fedramp-automation validator, the following additional role appears to be required:

- fedramp-pmo: FedRAMP Project Management Office (PMO)

2 **Brian Ruf** 2026-04-08 01:09:41

Good catch. I'm more inclined to remove this from the validator, but we should discuss either way.

Title Pages 0 open · 1 archived

ARCHIVED COMMENTS

1 **Erik Cass** 2026-03-26 02:11:43 (edited 2026-04-08 12:48:24) **ARCHIVED**

[@Brian Ruf](#) I added an additional prop reference based upon the guidance formally found on the FedRAMP documentation website (since decommissioned). I preserved it mostly as is, but change the verb from "must" to "should" since the implied reference no longer exists. However, it seems like a useful addition. If not, my edit should be reverted.

2 **Brian Ruf** 2026-04-08 01:19:45

I like the catch and addition of `marking`. Thank you!

I removed the `fedramp-version` prop as that was tied to the validation file version, which is no longer relevant as PMO is no longer maintaining or publishing validation files. If we end up maintaining validation files and want to address that with a prop, it will need to be a different prop name.

Legacy FedRAMP System Security Plan (SSP)

11. Seperation of Duties Matrix 0 open · 1 archived

ARCHIVED COMMENTS

1 **Brian Ruf** 2026-02-25 13:21:53 (edited 2026-04-13 19:04:31) **ARCHIVED**

[@Brian Ruf](#) to add content.

2 **Brian Ruf** 2026-04-13 19:04:29

complete.

3. System Information 0 open · 2 archived

ARCHIVED COMMENTS

2 **Erik Cass** 2026-03-10 22:31:43 (edited 2026-04-08 14:33:07) **ARCHIVED**

There doesn't seem to be a pattern for the Digital Identity Level (DIL) Determination (follow Service Model). As much a test of my own understanding as it is a recommendation, but what about this?

```
<system-security-plan>
```

```
<system-characteristics>
```

```
<prop ns="https://fedramp.gov/ns/oscal" name="dil-determination" value="SOME_VALUE" />
```

```
</system-characteristics>
```

```
</system-security-plan>
```

As indicated above must be either **IAL3/FAL3/AAL3**, **IAL2/FAL2/AAL2**, or **IAL1/FAL1/AAL1**.

3 **Brian Ruf** 2026-03-11 19:13:45

It's actually covered in Appendix E, but should be linked from this page. I'll make that update.

I haven't yet converted the example to YAML, but you can see it with XML [here](#):

4 **Brian Ruf** 2026-04-08 01:16:28

I didn't completely respond to your comment in my last response, and it's a fair question.

I'd prefer to keep the three levels (IAL, FAL, AAL) separate even though the historic guidance is that all three are the same for a given baseline. If that guidance ever changes, I don't want people to have to change the props they use. Also, I believe the three separate props we are using are recognized as core OSCAL whereas a single prop would need to be a FedRAMP extension.

1 **Brian Ruf** 2026-02-25 13:25:50 (edited 2026-04-08 14:33:20) **ARCHIVED**

Switch XML to YAML

Switch XPath to JSON Pointer (<https://datatracker.ietf.org/doc/html/rfc6901>)

Apply to all pattern content.

5 **Brian Ruf** 2026-04-08 14:33:18

Per TFG discussion, we are not including paths/pointers in the documentation at this time.

7. External Systems and Services Not Having FedRAMP Authorization

0 open · 1 archived

ARCHIVED COMMENTS

1 **Rene M. Tshiteya** 2026-03-31 17:58:53 (edited 2026-04-13 19:00:36) **ARCHIVED**

Todo: Convert XPath queries to JSON Pointer

2 **Brian Ruf** 2026-04-13 19:01:47

We have agreed to skip any form of path for now.

8. Illustratred Architecture and Narratives 0 open · 1 archived

ARCHIVED COMMENTS

1 **Rene M. Tshiteya** 2026-03-31 18:11:24 (edited 2026-04-13 19:00:48) **ARCHIVED**

Todo: Replace XPath queries with JSON Pointer

2 **Brian Ruf** 2026-04-13 19:01:39

We have agreed to skip any form of path for now.

9. Services, Ports and Protocols 0 open · 1 archived

ARCHIVED COMMENTS

1 **Rene M. Tshiteya** 2026-03-31 18:50:06 (edited 2026-04-08 14:31:34) **ARCHIVED**

To do: Replace XPath queries with JSON Pointer

2 **Brian Ruf** 2026-04-08 00:51:00

We have since agreed not to include paths at this time.

Appendicies Overview 0 open · 1 archived

ARCHIVED COMMENTS

1 **Rene M. Tshiteya** 2026-03-18 03:28:40 (edited 2026-04-13 19:03:20) **ARCHIVED**

Should Separation of Duties matrix be listed as an optional attachment (e.g., for MVP) or do we have a good way to represent this in OSCAL?

2 **Brian Ruf** 2026-04-13 19:03:15

Separation of duties matrix is now addressed in [Section 11](#).

Inventory: Normalized Approach 0 open · 1 archived

ARCHIVED COMMENTS

1 **Rene M. Tshiteya** 2026-03-31 19:42:57 (edited 2026-04-08 14:31:14) **ARCHIVED**

To do: Replace XPath queries with JSON Pointer

2 **Brian Ruf** 2026-04-08 14:31:10

Per TFG discussion, we are not including paths/pointers in the documentation at this time.

Native Adoption Path 0 open · 1 archived

ARCHIVED COMMENTS

1 **Brian Ruf** 2026-04-15 12:35:33 (edited 2026-04-15 14:21:56) **ARCHIVED**

Add note to clarify FedRAMP PMO prefers new systems to start with 20x.

2 **Brian Ruf** 2026-04-15 14:21:54

done.

Prepared By/For 0 open · 2 archived

ARCHIVED COMMENTS

3 **Brian Ruf** 2026-04-08 21:05:22 (edited 2026-04-13 19:06:21) **ARCHIVED**

Add link to callout

4 **Brian Ruf** 2026-04-13 19:06:19

done

1 **Rene M. Tshiteya** 2026-03-18 03:19:26 (edited 2026-04-08 20:46:52) **ARCHIVED**

Typo in the page heading / title

2 **Brian Ruf** 2026-04-08 01:11:31

Looks like this was resolved. If you agree, please archive this comment.

Retrofit Adoption Path 0 open · 3 archived

ARCHIVED COMMENTS

6 **Brian Ruf** 2026-04-08 12:55:17 (edited 2026-04-14 18:57:17) **ARCHIVED**

Add note to adoption pages that anything not converted to machine readable should still be attached as a Word artifact.

7 **Brian Ruf** 2026-04-14 18:57:15

Done.

2 **Brian Ruf** 2026-03-18 12:16:56 (edited 2026-04-02 15:53:02) **ARCHIVED**

Per today's TFG, need to clarify that this approach is focused on legacy Word SSP conversion. Need a different approach for "New" SSP authors who should likely start with components.

4 **Brian Ruf** 2026-03-26 18:40:04

This page is now part of a [larger adoption topic](#) that covers both retrofit and new adoptions.

1 **Rene M. Tshiteya** 2026-03-18 03:05:26 (edited 2026-04-02 15:53:48) **ARCHIVED**

The SSP adoption strategy described on this page is well suited for systems that are already authorized / already have an SSP. However, CSPs that are early in their authorization journey may be better positioned to attempt the "advanced" / "ideal" path from the get go, especially if they have access to OSCAL-ready GRCs and tooling.

5 **Brian Ruf** 2026-04-02 15:53:42

This is now addressed as the New Adoption Path.

SSP Adoption Strategies 0 open · 1 archived

ARCHIVED COMMENTS

1 **Brian Ruf** 2026-04-15 12:35:38 (edited 2026-04-15 14:22:11) **ARCHIVED**

Add note to clarify FedRAMP PMO prefers new systems to start with 20x.

2 **Brian Ruf** 2026-04-15 14:22:09

done