

FedRAMP Minimum Assessment Scope

Note: The Minimum Assessment Scope was formerly referred to as the FedRAMP Boundary Policy / Boundary Guidance

Effective Date(s) & Overall Applicability

This standard will apply in stages, rescinding and superseding all previous FedRAMP guidelines and standards regarding the FedRAMP authorization boundary, as follows:

- **FedRAMP 20x:** Effective Friday, May 30, 2025 for **ALL** FedRAMP 20x authorizations. Minimum Assessment Scope is primarily documented and validated in KSI-PIY and KSI-TPR.
- **FedRAMP Rev 5:** Effective Monday, June 30, 2025 for **LIMITED PILOT ADOPTION** in **ALL** FedRAMP Rev5 authorizations.

Providers **MUST** participate in the FedRAMP R5.MAS pilot to transition from the Rev 5 legacy boundary until a final transition path is announced; the R5.MAS pilot will be announced in June.

These effective date(s) & overall applicability will be updated over time.

Background & Authority

[OMB Circular A-130: Managing Information as a Strategic Resource](#) section 10 states that an "Authorization boundary" includes *"all components of an information system to be authorized for operation by an authorizing official. This excludes separately authorized systems to which the information system is connected."* and

further adds in footnote 64 that *“Agencies have significant flexibility in determining what constitutes an information system and its associated boundary.”*

[NIST SP 800-37 Rev. 2: Risk Management Framework for Information Systems and Organizations: A System Life Cycle Approach for Security and Privacy](#) chapter 2.4

footnote 36 similarly states that *“the term authorization boundary is now used exclusively to refer to the set of system elements comprising the system to be authorized for operation or authorized for use by an authorizing official (i.e., the scope of the authorization).”*

[The FedRAMP Authorization Act \(44 USC § 3609 \(a\) \(4\)\)](#) requires the General Services Administration to *“establish and update guidance on the boundaries of FedRAMP authorization packages to enhance the security and protection of Federal information and promote transparency for agencies and users as to which services are included in the scope of a FedRAMP authorization.”* This responsibility is [delegated to the FedRAMP Director](#).

Introduction

Application boundaries that are defined too broadly complicate the assessment process by introducing components that are unlikely to have an impact on the confidentiality, integrity or accessibility of the offering. The Minimum Assessment Scope provides guidance for cloud service providers to narrowly define information resource boundaries while still including all necessary components.

Expected outcomes from application of the Minimum Assessment Scope include:

- Boundaries will be scoped to include the minimum number of components to make authorization and assessment easier
- Cloud service providers will define clear boundaries for security and assessment of offerings based on the direct risk to federal information
- Third-party independent assessors will have a simple well documented approach to assess security and implementation decisions

- Federal agencies will be able to easily, quickly, and effectively review and consume security information about the service to make informed risk-based Authorization to Operate decisions based on their planned use case

Definitions

The following definitions apply to all FedRAMP materials:

FRD-MAS-01: “Federal information” has the meaning from [OMB Circular A-130](#) and any successor documents. As of Apr 2025, this means *“information created, collected, processed, maintained, disseminated, disclosed, or disposed of by or for the federal government, in any medium or form.”*

This typically does not include information that a cloud service provider produces outside of a government contract or agreement. Review FedRAMP’s Technical Assistance on Federal Information and consult qualified legal experts for additional assistance identifying federal information.

FRD-MAS-02: “Information resources” has the meaning from [44 USC § 3502 \(6\)](#): *“information and related resources, such as personnel, equipment, funds, and information technology.”*

This applies to any aspect of the cloud service offering, both technical and managerial, including everything that makes up the business of the offering from organizational policies and procedures to hardware, software, and code.

FRD-MAS-03: “Handle” has the plain language meaning inclusive of any possible action taken with information, such as access, collect, control, create, display, disclose, disseminate, dispose, maintain, manipulate, process, receive, review, store, transmit, use... etc.

FRD-MAS-04: “Likely” means a reasonable degree of probability based on context.

FRD-MAS-05: “Third-party information resource” means any information resource that is not entirely included in the FedRAMP Minimum Assessment Scope for the cloud service offering seeking authorization.

FedRAMP Minimum Assessment Scope

All aspects of the Minimum Assessment Scope are determined and maintained by the cloud service provider in accordance with related FedRAMP authorization requirements and documented by the cloud service provider in their assessment and authorization materials.

The following rules apply to ALL FedRAMP authorizations when a cloud service provider uses the Minimum Assessment Scope in place of a traditional FedRAMP Boundary:

FRR-MAS-01: Providers MUST establish a FedRAMP Minimum Assessment Scope that includes all information resources that are likely to handle federal information or likely to impact the confidentiality, integrity, or availability of federal information.

FRR-MAS-02: Providers MUST include the configuration and usage of third-party information resources, ONLY IF FRR-MAS-01 applies.

FRR-MAS-03: Providers MUST clearly identify and document the justification, mitigation measures, compensating controls, and potential impact to federal information from the configuration and usage of non-FedRAMP authorized third-party information resources, ONLY IF FRR-MAS-01 applies.

FRR-MAS-04: Providers MUST include metadata (including metadata about federal information), ONLY IF FRR-MAS-01 applies.

FRR-MAS-05: Providers MUST clearly identify, document, and explain information flows and impact levels for ALL information resources.

Application of the Minimum Assessment Scope

The following rules provide general guidance on the application of the Minimum Assessment Scope:

FRR-MAS-AY-01: Certain categories of cloud computing products and services are specified as entirely outside the scope of FedRAMP by the Director of the Office of Management and Budget. All such products and services are therefore also outside the Minimum Assessment Scope. For more, see fedramp.gov/scope.

FRR-MAS-AY-02: Software produced by cloud service providers that is delivered separately for installation on agency systems and not operated in a shared responsibility model (typically including agents, application clients, mobile applications, etc. that are not fully managed by the cloud service provider) is not a cloud computing product or service and is entirely outside the scope of FedRAMP under the FedRAMP Authorization Act. All such software is therefore outside the Minimum Assessment Scope. For more, see fedramp.gov/scope.

FRR-MAS-AY-03: Information resources (including third-party information resources) that do not meet the conditions in FRR-MAS-01 are outside the Minimum Assessment Scope (FRR-MAS-02).

FRR-MAS-AY-04: Information resources (including third-party information resources) MAY vary by impact level as appropriate to the level of information handled or impacted by the information resource (FRR-MAS-05).

FRR-MAS-AY-05: All parties SHOULD review best practices and technical assistance provided separately by FedRAMP for help with applying the Minimum Assessment Scope as needed.

Exceptions to the Minimum Assessment Scope

The following rule notes exceptions to the Minimum Assessment Scope:

FRR-MAS-EX-01: Providers MAY include documentation of information resources beyond the Minimum Assessment Scope, or even entirely outside the scope of FedRAMP, in a FedRAMP assessment and authorization package supplement; these resources will not be FedRAMP authorized and MUST be clearly marked and separated from the Minimum Assessment Scope.