

FedRAMP Class C, Explained

The Moderate-aligned certification class under **FedRAMP 20x**.

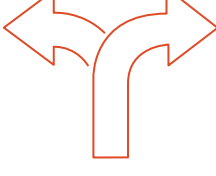
What is Class C?

Class C is the Moderate-aligned certification class in the new FedRAMP structure. It fits most Low and Moderate impact agency systems, and some High impact systems with the right compensating controls.



Assurance depth, not security depth

FedRAMP says certification classes show the level of assurance provided, not the level of security or protection.



Two ways in

Existing Rev 5 Moderate providers transition into Class C. Net-new providers can enter directly through the 20x pipeline.



Not a starting point for most

FedRAMP's own guidance says new entrants generally should not go straight to Class C without an agency customer requiring that level of commitment.

Rev 5 or 20x?

Both paths land in the same Moderate-aligned lane, but the operating model is different.

If you're already Rev 5 Moderate, your authorization now sits in Rev 5 Class C. You have to adopt the CR26 rules by January 1, 2027.

If you're net new, the 20x Class C pipeline opened August 31, 2026, running on a continuous, Key Security Indicator-driven assurance model instead of the old annual refresh cycle.

What Changes for Existing Moderate Providers

1 Recognize the relabel

Your current Moderate authorization now sits in Rev 5 Class C.

2

Adopt CR26

The new rules become mandatory for all existing Rev 5 certifications on January 1, 2027.

3

Move off monthly scanning

VDR and VER become mandatory December 7, 2026, with a grace period through March 7, 2027.

4

Go continuous

Shift from a package that gets refreshed once a year to certification data you maintain on an ongoing basis.

Class C Has Real Deadlines

The pipelines are open.

As of August 31, 2026, the 20x **Class B** and **Class C** are open for submissions.

Class C Has Real Deadlines

2026
DECEMBER

MON
7

VDR and VER become mandatory, with a grace period through March 7, 2027.

2027
JANUARY

FRI
1

CR26 becomes mandatory for every existing Rev 5 certification.

Is Class C Your Right Move?

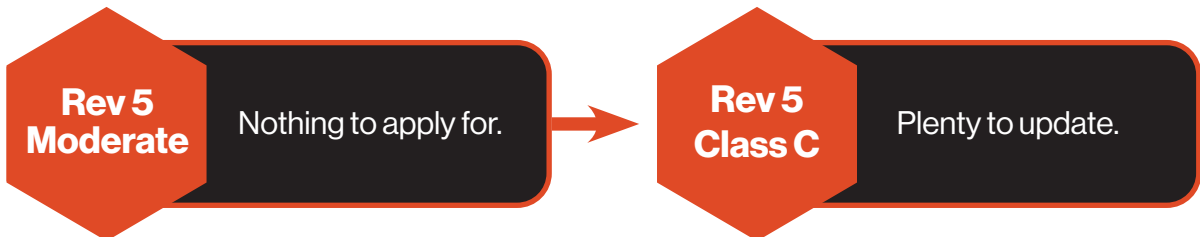
For net-new providers, Class C fits when:

- ☐ You already have an agency customer requiring Moderate-level assurance
- ☐ You can support a continuous, Key Security Indicator-driven model from day one
- ☐ Your use case genuinely needs that assurance depth, not just a stronger label
- ☐ You're targeting assurance depth, not chasing a "more secure" claim

If none of these are true yet, start with the lowest class that fits your actual agency need. Moving to Class C without a specific reason to be there is exactly what FedRAMP's own guidance advises against.

If you're serving mixed civilian and DoD-related demand, do not assume 20x alone satisfies DoD or CMMC equivalency expectations.

If You're Already Rev 5 Moderate



Adopt the CR26 rules on FedRAMP's timeline. Get ahead of VDR and VER before the grace period closes. Start treating your certification data as something you maintain continuously, not something you refresh once a year.

Questions about Class C? We have answers.

Coalfire helps you figure out where you stand, what CR26 changes for you, and what you need to maintain, report, and prove going forward.

See Coalfire's FedRAMP certification services