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FROM COMPLIANCE TO ADVANTAGE

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Use What You Know – Just Level Up

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Suquamish Clearwater Casino Resort, August 17-18, 2026

Microsoft

Mission Cloud Ready

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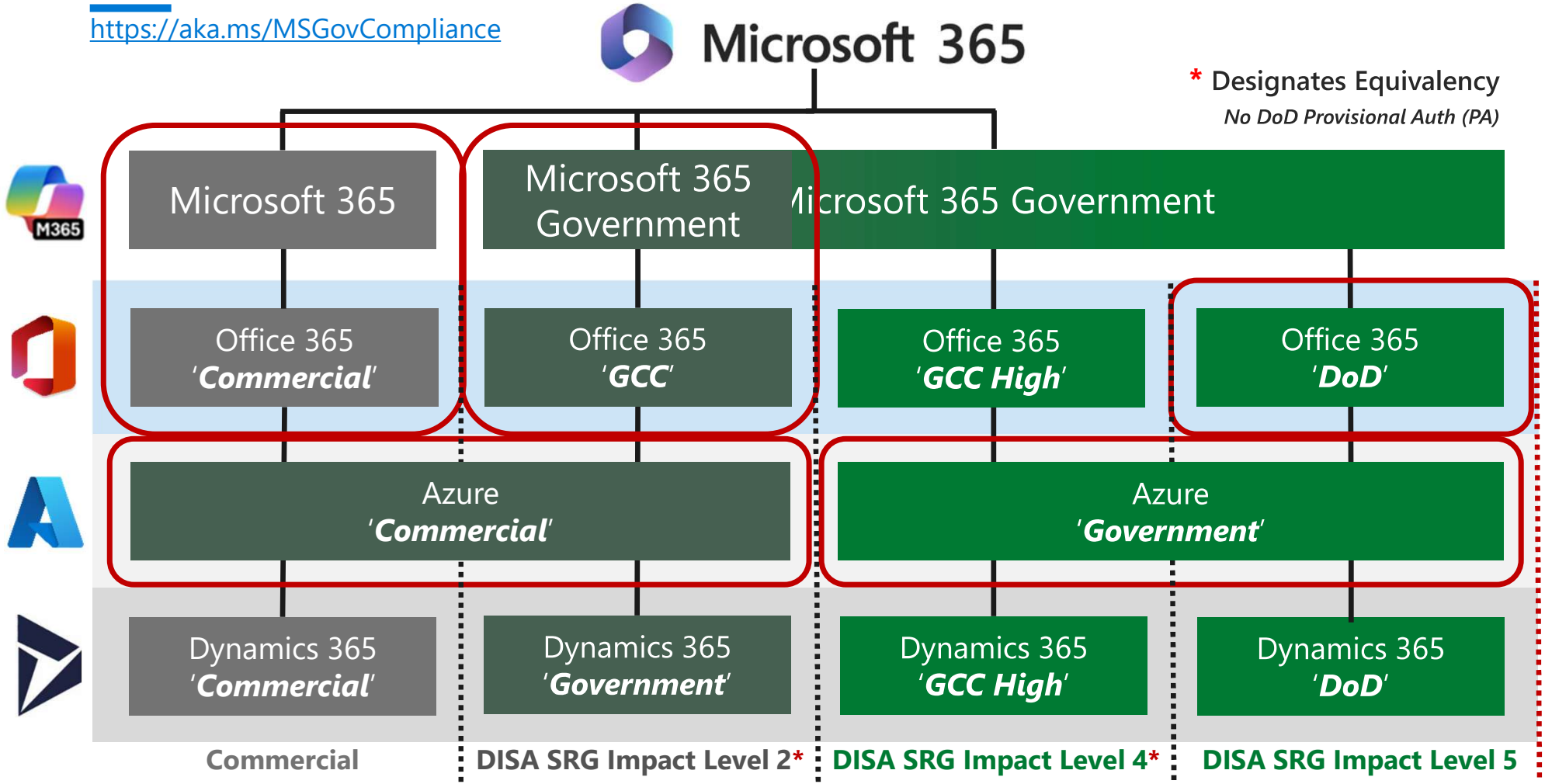
August 2026

History of Microsoft Cloud Service Offerings leading to the US

https://aka.ms/MSGovCompliance



Cloud Service offering differentiation - Azure

Public Sector Blog

	Azure '*Commercial*'	Azure '*Government*' (US Sovereign Cloud)
Customer Eligibility	Any customer	Federal, DoD, SLG, Eligible Contractors (DIB, FFRDC, UARC)
Region / Geo Locations	Moderate & High P-ATO/PA	Moderate & High P-ATO/PA
FedRAMP	High PA	High PA
DFARS 252.204-7012	Yes	Yes
FCI + CMMC L1	Yes	Yes
CUI / CDI + CMMC L2-3	Yes^^	Yes
ITAR / EAR / NOFORN	No	Yes
DoD CC SRG Level	IL2 PA	IL2, IL4 & IL5 PAs
NIST SP 800-53 / 171 [1]	Yes	Yes
CJIS Agreement	No	Yes
NERC / FERC	No	Yes
Customer Support	Worldwide / Commercial Personnel	US-Based / Restricted Personnel
Directory / Network	Worldwide	CONUS Only
		US Sovereign Cloud

[1] Organizational Defined Values (ODV's) will vary
^^ CUI Specified (*e.g., ITAR, Nuclear, etc.*) not suitable; requires US Sovereignty
PA = Provisional Authorization / Provisional ATO

Why Microsoft 365 Government for CMMC?

Microsoft is committed to supporting CMMC compliance by offering powerful productivity solutions on a comprehensive cloud platform with Microsoft 365 Government.

Microsoft 365 GCC

Complies with:

FedRAMP High, Defense Federal Acquisition Regulations Supplement (DFARS), and DISA Cloud Computing Security Requirement Guide (CC SRG) Impact Level 2.

Microsoft 365 GCC High and DoD

Complies with:

FedRAMP High, Defense Federal Acquisition Regulations Supplement (DFARS), DISA Cloud Computing Security Requirement Guide (CC SRG) Impact Level 4, and International Traffic in Arms Regulations (ITAR).

Ideal for CMMC L2 or ITAR customers

Additional resources:

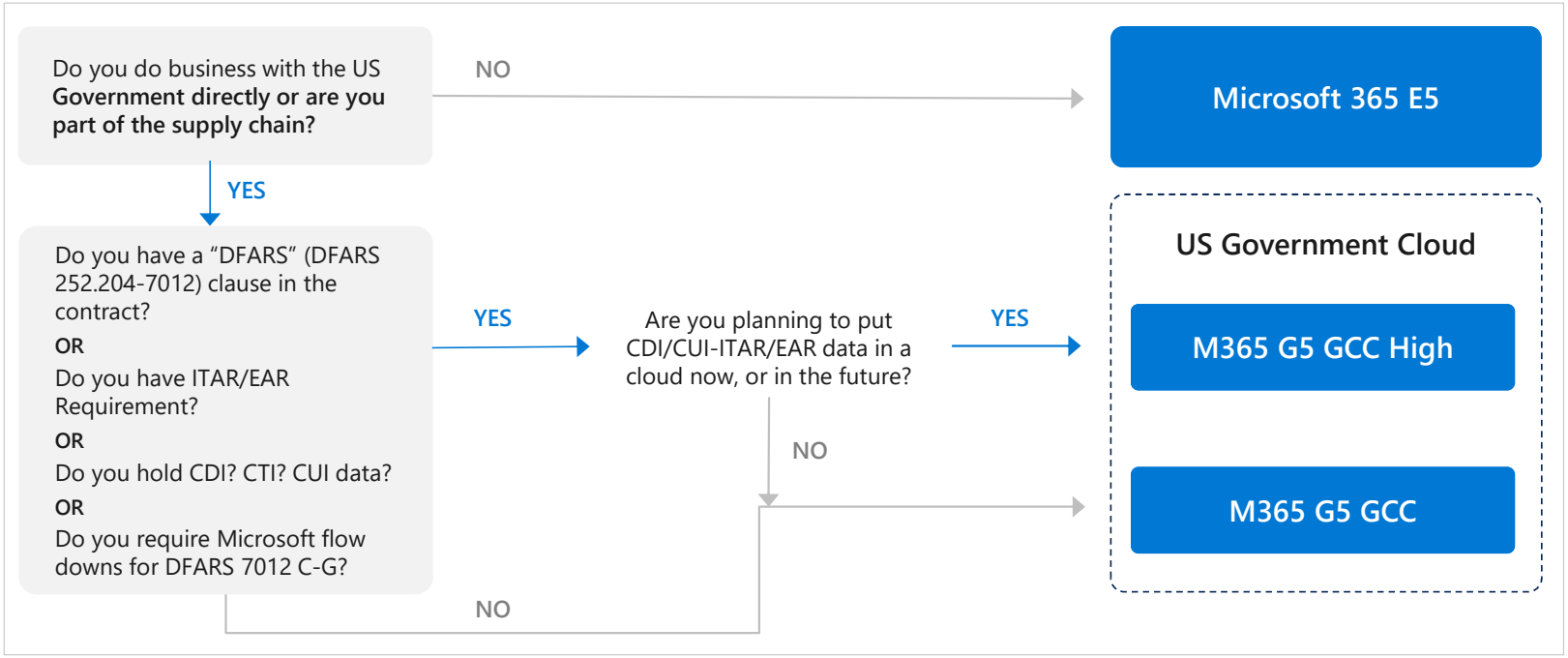
Read this blog post to learn more about Microsoft offerings for the US sovereign cloud.

Download the Product Placemat to see how Microsoft products satisfy CMMC requirements.

Determine the right Microsoft cloud

Key insight

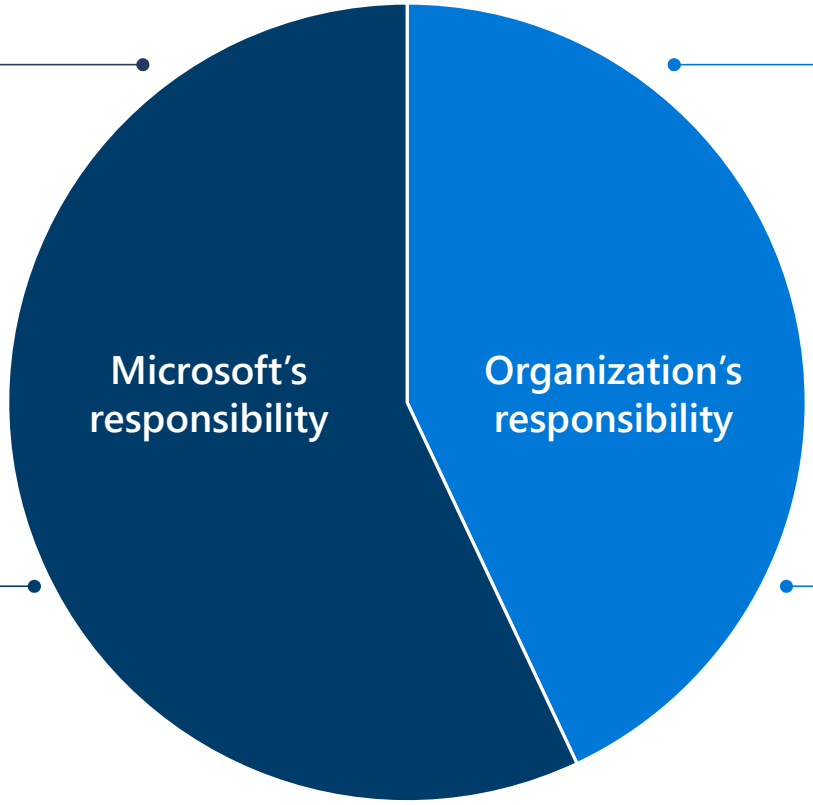
Ultimately a customer is accountable to determine if a cloud meets their obligations.
These questions are a conversation starting point — customers are responsible for assessing their compliance obligations and determining if the Microsoft US Government Cloud meets their needs.



[Eligibility validation form Microsoft Government Eligibility team]

Shared responsibility examples

Microsoft partners with you to meet your security, compliance, and privacy needs



Access to production environment

Set up access controls that strictly restrict standing access to customer's data or production environment

Protect data

Encrypt data at rest and in transit based on industrial standards (BitLocker, TLS, etc.)

Personnel control

Strict screening for employees, vendors, and contractors, and conduct trainings through onboarding process

Access to production environment

Set up access control policy and SOP, leveraging Customer Lockbox*/ identity management solutions

Protect data

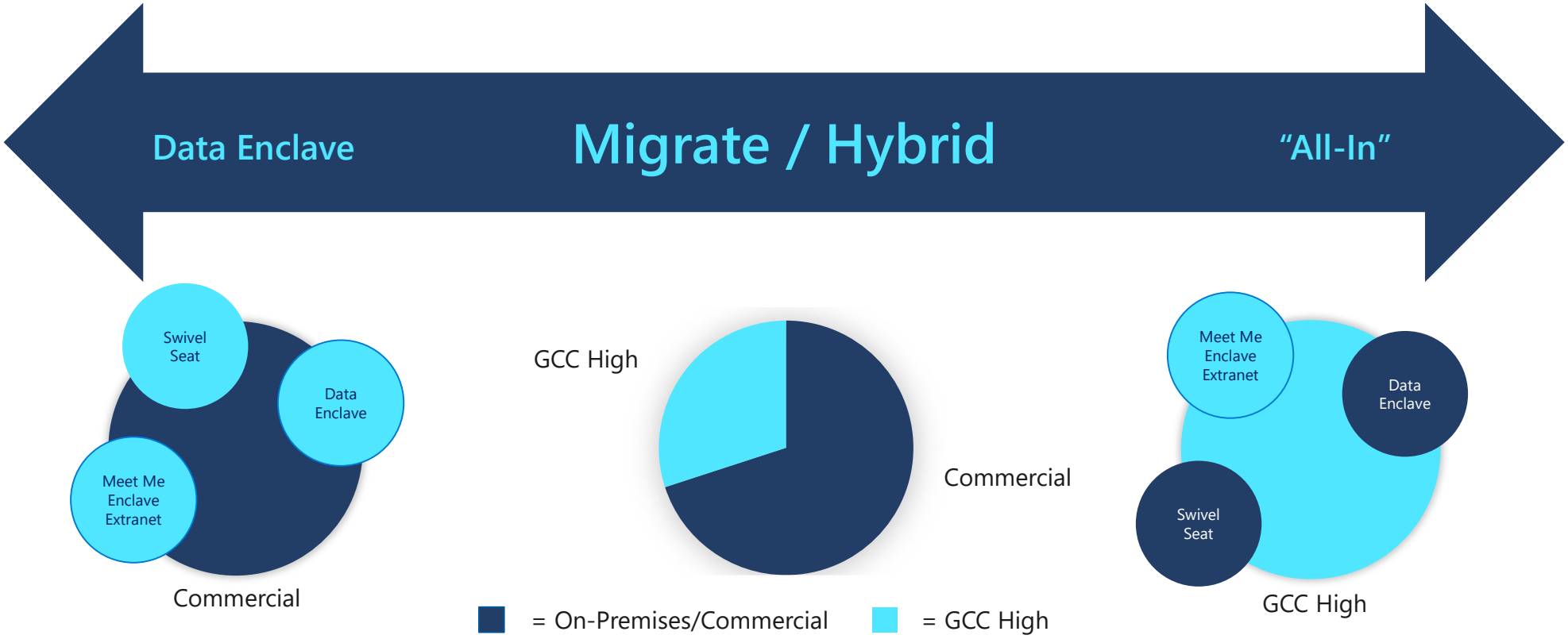
Encrypt data based on org's compliance obligations. E.g. encrypt PII in transit between users, using its own encryption key, etc.

Personnel control

Allocate and staff sufficient resources to implement and operate an organization-wide privacy program, including awareness-raising and training

Public Sector Community Blog

The Microsoft 365 US Government (GCC High) Conundrum
DIB Data Enclave vs Going All In



Data Enclave 'Swivel-Seat' Considerations

Starting point for most organizations, enabling shift to split-tenant and "All-In"

Clean system / compliance boundary for CMMC assessment and certification

Fastest path to setup a CMMC compliant environment

Overall cost may be less for smaller user populations requiring dual-licensing, or more for larger user populations in the data enclave.

Perplexing user experience having to swivel-seat between user accounts and end-points (*e.g. devices, AVD/W365, application URLs*)

Accommodates multi-national and competing jurisdictions for compliance (*US Gov't controls vs Non-US Gov't controls*) that do not fit into a single sovereign cloud (e.g. GCC High + Azure Gov)

Risk for spillage of highly sensitive information (*e.g. CUI, ITAR*) using the wrong account (*users will ALWAYS prefer their primary Commercial account, as will external users collaborating with them*)

Complexity, administrative and operational overhead of managing multiple tenants

Bi-furcated user, device, application and conditional access policy registrations

Not recommended for shared-data only (*e.g. SPO document library, Teams / M365 groups*). Individual-data (*e.g. e-mail, ODfB, Teams meetings*) is where highly sensitive information often ends up (*even if not intended, such as the DoD e-mailing you CUI*) unless the individual-data is compliant as well (*not in commercial*)

Do data enclaves really work? Yes, for the specific purpose intended. However, most organizations gravitate towards split-tenant and "All-In" over time as they come to realize data spillage into Commercial and the user experience really don't work in a data enclave.

Going “All-In” Considerations

Everyone is within the same (*highest*) compliance boundary, including non-US persons

Best user experience offering highest ease of use for collaboration and application access

Single tenant is always a better user experience than bi-furcated tenants

Microsoft engineers for a single organization in a single tenant

Reduced risk for spillage of highly sensitive information (e.g CUI, ITAR)

Consolidated user, device and application policy registrations

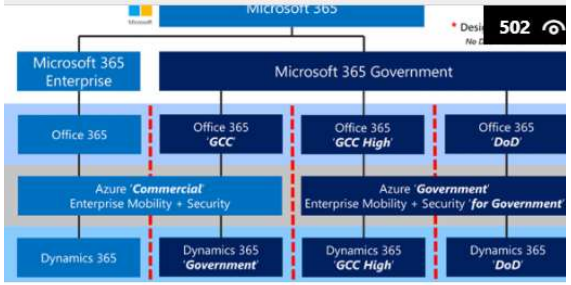
Consistent conditional Access Settings

Simplified with a clean system / compliance boundary for CMMC assessment and certification

Public Sector Community

July 2025 Update

[Public Sector Community Blog]

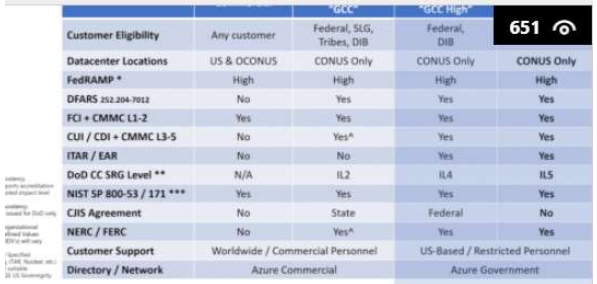


History of Microsoft Cloud Offerings leading to the US...

RichardWakeman on 02-23-2021 07:36 AM

Microsoft has evolved our cloud service offerings to include the US Sovereign Cloud with Azure Government, Microsoft 365...

[History of Microsoft Cloud Service Offerings leading to the US]



Understanding Compliance Between Commercial, Government...

RichardWakeman on 02-23-2021 07:34 AM

Understanding compliance between Commercial, Government and DoD offerings: There remains much confusion as to what servi...

[Understanding Compliance Between Microsoft 365 Commercial, Government and DoD Offerings]

The Microsoft 365 US Government (GCC High) Conundrum - DIB...

RichardWakeman on 10-30-2019 10:00 AM

The DIB (Defense Industrial Base) are embracing M365 GCC High to achieve compliance with U.S. defense

[The Microsoft 365 US Government (GCC High) Conundrum - DIB Data Enclave vs Going All In]

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Thank You

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