

FIELD GUIDE

GCC vs. GCC High: Which Do You Need for CMMC?



SENTINELBLUE

SUMMARY

Who This Guide Is For

- Organizations Seeking Certification (OSCs)
- Federal contractors in the DIB
- Anyone with an interest in CMMC

What This Guide Contains

- Questions to help OSCs determine whether they need Microsoft
- Questions to help OSCs choose between GCC and GCC High

About Sentinel Blue Field Guides

Security is a team sport. We believe the Defense Industrial Base is stronger when knowledge and expertise are shared openly. That's why we've created free educational resources for federal contractors navigating cybersecurity and compliance challenges.

If you find this guide helpful, please share it with your community. Shields up!

GCC vs. GCC High: Which Do You Need for CMMC?

If you're trying to figure out whether you need Microsoft GCC (Government Community Cloud) or GCC High, you're not alone. This guide breaks down the choice into two questions: whether you need Microsoft's government cloud ecosystem at all, and if so, whether GCC or GCC High is better for CMMC Level 2 compliance.

1. Do You Need Microsoft at All?

We're technologists at heart, and we'll say upfront that Microsoft has real advantages for CMMC. GCC High is where most of our clients end up... but that doesn't mean it's the only place to end up. An assessor doesn't care what platform you chose, only whether it can support the controls you're claiming. Here are three key questions to help you assess whether Microsoft makes sense for your organization.

A. Are you already living in the Microsoft ecosystem?

If your organization already runs on Outlook, Teams, SharePoint, and Windows, it will be fairly straightforward to migrate from Microsoft 365 into the Microsoft GovCloud version of the same tools. If your team is already comfortable in Microsoft's world, staying there usually simplifies your CMMC Level 2 compliance.



B. What's in your tech stack now?

Organizations often assume a non-Microsoft stack is cheaper, and it can be... until you price out what it takes to make that stack defensible. By the time you've added a data sovereignty add-on to Google Workspace, accounted for US-based cloud storage, and bolted together all your other applications, the total cost of ownership frequently lands at or above a consolidated Microsoft environment. Fragmentation has a price tag, so just make sure you've calculated your costs.

C. How many endpoints does your CUI boundary touch?

If your compliance boundary for Controlled Unclassified Information (CUI) is cleanly contained to cloud-hosted systems, you have more flexibility than you might think. But CMMC scope rarely stays that clean in practice. The moment CUI lands on your employee's desktop in the office, gets pulled up on your laptop at home, or is accessed by your subcontractor outside your core environment, you've extended your boundary. The associated endpoint-level controls are exactly where Microsoft's ecosystem excels.

2. Which Microsoft GovCloud option is right for you?

Once you've decided Microsoft is the right foundation, the next question is which government cloud tier you actually need. For those of you who like seeing all the details, we've also put together an [in-depth article on GCC vs. GCC High](#).

The CliffsNotes version: GCC runs on Azure Commercial infrastructure with a government-community layer on top, while GCC High runs on Azure Government with a physically separate environment, screened US-persons-only personnel, and FedRAMP High authorization built for defense-sector data specifically. These next questions will help you sort out which one makes more sense for you.

A. Do you need to comply with ITAR, FedRAMP High, or similar regulations?

This one is simple: If your organization handles export-controlled CUI or is required to comply with International Traffic in Arms Regulations (ITAR) or FedRAMP High, then GCC High is required. Data sovereignty and personnel screening requirements tied to export control can't currently be satisfied by GCC's Azure Commercial foundation.



B. Do you handle or store any data beyond CUI Basic?

If you're not working with CUI data, or if you're strictly confined to handling and storing data at the CUI Basic level, you may not need GCC High. Examples: an IT contractor that provides admin support services like scheduling and low-sensitivity communications for the DoD, or a PR agency that writes press releases for a DoD contractor based on public information. In these cases, GCC is likely a viable option.

C. How many user seats do you have?

Historically, GCC High licensing required enterprise commercial agreements, but that's shifted recently. Microsoft has extended GCC High access downmarket, including through Business Premium tiers aimed at smaller contractors. The packaging on those smaller tiers changes often, but it's possible to get GCC High for a small enclave implementation without breaking the bank.

D. Is there a chance you'll need GCC High down the road?

Yes, GCC High costs more than GCC... but migrating into GCC High after you've already built workflows, trained users, and integrated systems around GCC is less than ideal. You'll be undertaking a second migration with its own timeline and its own cost, usually undertaken under more time pressure than you'd like because a new contract or new client requirement is suddenly forcing the issue. If there's a plausible future where your scope, your customer base, or your contract requirements will require GCC High in the next year or two, it's usually cheaper to start there than to migrate twice.

Additional Guidance

There's no single right answer to the GCC vs. GCC High question; it all depends on your data, contracts, risk tolerance, and future plans. For advice tailored to your specific environment, Sentinel Blue is available to help.

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