

Compliance drift report, September 2026: 69% of DPF listings lapsed, BAA coverage and registry mix across 3,000 vendors

Figures as of 18 Sep 2026. Generated 18 Sep 2026. Current month; refreshed daily.

This report reads the CertReports index as of 18 Sep 2026: 8,228 public evidence rows across 3,000 B2B software vendors, drawn from 6 sources. It measures drift: how much public compliance evidence lapsed, how old it is, and how coverage differs by framework and category. Every figure below is computed from stored rows, dated, and reproducible.

44.3% of evidence rows are past their date (3,645 of 8,228 rows)

69% of DPF listings linked to vendors have lapsed (3,455 lapsed, 1,585 active)

29.6% of the top 2,000 vendors carry a lapsed EU-US Data Privacy Framework row (586 of 1,981 vendors by demand ran

Lapse rates by framework

A row lapses when its own evidence says so: a certificate expiry, a report period plus twelve months, a registry usage end date, a registry validation date plus twelve months, or a registry withdrawal. Active rows are verified or stated rows whose date has not passed.

Framework	Active rows	Lapsed rows	Lapse share	Expiring in 90 days	Sources
EU-US Data Privacy Framework	1,585	3,455	68.6%	356	dpf
PCI DSS	1,616	190	10.5%	438	drata, vanta, visa_grsp
FedRAMP	673	0	0.0%	0	drata, fedramp, vanta
CSA STAR	413	0	0.0%	0	csa_star, drata, vanta
ISO/IEC 27001	70	0	0.0%	0	csa_star, drata, vanta
SOC 2	46	0	0.0%	0	csa_star, drata, vanta
GDPR	21	0	0.0%	0	drata, vanta
CCPA / CPRA	17	0	0.0%	0	drata, vanta
ISO/IEC 27018	16	0	0.0%	0	drata, vanta
ISO/IEC 27017	16	0	0.0%	0	drata, vanta
HIPAA	15	0	0.0%	0	drata, vanta
ISO/IEC 42001	13	0	0.0%	0	drata, vanta
ISO/IEC 27701	9	0	0.0%	0	drata, vanta
SOC 3	8	0	0.0%	0	drata
TX-RAMP	8	0	0.0%	0	drata
BSI C5	7	0	0.0%	0	drata
ENS	7	0	0.0%	0	drata
IRAP	7	0	0.0%	0	drata, vanta
TISAX	7	0	0.0%	0	drata

GovRAMP	6	0	0.0%	0	drata
Cyber Essentials	6	0	0.0%	0	drata, vanta
SOC 1	5	0	0.0%	0	drata, vanta

Lapse share is lapsed divided by active plus lapsed, as of 18 Sep 2026.

Lapsed rows by framework

EU-US Data Privacy Framework	3,455 68.6%
PCI DSS	190 10.5%

The top 2,000 vendors

The 2,000 highest-demand vendors in the catalogue (1,981 active) are the ones most reviews touch. This table asks a narrower question than the one above: how many of them carry at least one lapsed row per framework.

Framework	Top-2,000 vendors with a row	With a lapsed row	Share of the top 2,000
EU-US Data Privacy Framework	1,019	586	29.6%
FedRAMP	239	0	0.0%
CSA STAR	217	0	0.0%
PCI DSS	190	25	1.3%
ISO/IEC 27001	56	0	0.0%
SOC 2	38	0	0.0%
GDPR	21	0	0.0%
CCPA / CPRA	17	0	0.0%
ISO/IEC 27018	16	0	0.0%
ISO/IEC 27017	16	0	0.0%
HIPAA	15	0	0.0%
ISO/IEC 42001	13	0	0.0%
ISO/IEC 27701	9	0	0.0%
SOC 3	8	0	0.0%
TX-RAMP	8	0	0.0%
BSI C5	7	0	0.0%
ENS	7	0	0.0%
IRAP	7	0	0.0%
TISAX	7	0	0.0%
GovRAMP	6	0	0.0%
Cyber Essentials	6	0	0.0%
SOC 1	5	0	0.0%
Cyber Essentials Plus	3	0	0.0%
ISO 22301	2	0	0.0%
HITRUST	2	0	0.0%

HDS	2	0	0.0%
ISMAP	2	0	0.0%
ISO 9001	1	0	0.0%

Evidence age

Days between the capture date of each row and 18 Sep 2026. Registries are re-read nightly, so registry rows stay young; vendor-stated rows age until the page is captured again.

Framework	Rows	Median age (days)	90th percentile (days)
EU-US Data Privacy Framework	5,040	1	1
PCI DSS	1,806	1	1
FedRAMP	673	1	1
CSA STAR	413	1	1
ISO/IEC 27001	70	1	1
SOC 2	46	1	1
GDPR	21	1	1
CCPA / CPRA	17	1	1
ISO/IEC 27017	16	1	1
ISO/IEC 27018	16	1	1
HIPAA	15	1	1
ISO/IEC 42001	13	1	1

HIPAA BAA coverage by category

Share of indexable vendors in each category with a public business associate agreement offer. There is no HIPAA certification; the offer is the public artefact.

Category	Indexable vendors	With a public BAA offer	Coverage
Security	174	3	1.7%
Communications and CPaaS	49	3	6.1%
Compliance and GRC	118	2	1.7%
Cloud and hosting	93	1	1.1%
DevOps and observability	90	1	1.1%
Data platforms	87	1	1.1%
Analytics	85	1	1.2%
Customer support	63	1	1.6%
Identity and access	47	1	2.1%
Payments	305	0	0.0%
Marketing	98	0	0.0%
IT management	86	0	0.0%

Finance and accounting	83	0	0.0%
Business services	82	0	0.0%
Education	69	0	0.0%

FedRAMP status mix

Statuses as published in the Marketplace data file at the last sync, plus vendor-stated rows from trust centres. Under the Consolidated Rules for 2026 the official label is "FedRAMP Certified"; rows carry the text the file published.

FedRAMP rows by published status

FedRAMP Authorized	528
FedRAMP Ready	70
Agency In Process	48
FedRAMP In Process	13
Vendor states FedRAMP High on its	5
Vendor states FedRAMP Moderate on	4
Vendor states FedRAMP on its trust	3
Vendor states FedRAMP 20x on its t	2

Data Privacy Framework usage end

1,585	Active DPF listings linked to vendors
3,455	Past their usage end date (68.6% of linked listings)
356	Usage end dates in the next 90 days

Drift index

The drift index is the number of rows that lapsed or were removed in a month per 1,000 active rows. It is the time series behind the change log; the first observed month is September 2026, when the index went live, so the series is short and will lengthen with each report.

Month	Added	Renewed	Lapsed	Removed	Other events	Drift per 1,000 active rows
2026-09	249	0	0	4	165	0.9

Change events in the current series

2026-09	418
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Events in the period

Event type	Count
attestation added	249
subprocessor added	165
attestation removed	4

Method and sources

Registry rows: FedRAMP Marketplace data file, Data Privacy Framework participant list, Visa Global Registry of Service Providers, CSA STAR registry, mirrored nightly.

Vendor-stated rows: trust centres and security pages captured with a content hash and capture date.

Lapse: expiry date, period end plus twelve months, usage end date, validation date plus twelve months, or withdrawal.

Top 2,000: vendors ranked by demand in the CertReports catalogue.

Drift index: (lapsed + removed) in the month divided by active rows at generation, per 1,000.

Generated 18 Sep 2026. Figures for a closed month are frozen when the month ends; the current month is refreshed daily.

Cite this report

CertReports, Compliance drift report, September 2026. <https://certreports.com/reports/2026-09>. Figures as of 18 Sep 2026.