

**Removed Products List (RPL)  
Process Document**



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**FIPS 201 EVALUATION PROGRAM**

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**April 8, 2022**

Office of Government-wide Policy  
Office of Technology Strategy  
Identity Management Division  
Washington, DC 2040

## 1. Overview

The General Services Administration (GSA) is responsible for supporting the adoption of interoperable and standards-based Identity, Credential, and Access Management (ICAM) technologies throughout the Federal Government. As part of that responsibility, GSA operates and maintains the [Federal Information Processing Standard \(FIPS\) Publication 201 Approved Products List \(APL\) - Physical Access Control System Components](#) as well as services for Federal ICAM (FICAM) conformance and compliance. The enhanced FIPS 201 Evaluation Program has implemented numerous enhancements to benefit Evaluation Program stakeholders.

The Federal Government's emphasis on the use of products and services listed on the APL requires a proactive process to ensure periodic recertification and timely removal from the APL when a solution is no longer approved. Accordingly, the Evaluation Program has implemented a streamlined process to handle systems that age out of compliance.

## 2. Removed Products List Process

Figure 1 depicts the general concept and flow of the RPL process. All communication to the Evaluation Program shall be to the Program Manager ([Matthew.Arnold@gsa.gov](mailto:Matthew.Arnold@gsa.gov)).

Figure 1. Summary of the RPL Process



### 2.1. Step #1: Identify Product or Service Aging Out of Compliance

An already-approved product or service can become non-conformant for various reasons. Reasons include but are not limited to:

- New Functional Requirements and Test Cases (FRTC) documents are effective immediately. All approved Physical Access Control System (PACS) solutions must pass testing against new and revised FRTC requirements before the effective date of the new/revised requirements.

- Specific problems are discovered in a vendor's product or services (or class of products/services) after being listed on the APL. The affected vendor(s) are notified that the identified product(s) and services(s) must be improved within time frames specified in the FRTC, commensurate with the severity level of the problem.
- Updates to testing requirements due to concerns provided to the Evaluation Program by Federal agency buyers (e.g., update to Electronic Opaque Sleeve testing and approval procedures as a result of Federal agency testing that showed the sleeves didn't work).
- Updates to testing requirements due to issues provided to the Evaluation Program by vendors (e.g., Type B and Type A card issues).
- A product whose last certification letter is older than 12 months.

When any of the above events occurs, the Evaluation Program proactively monitors for non-conformance. Potentially affected products and services (or class of products/services) are evaluated as necessary. The Evaluation Program will collaborate with agency stakeholders, vendors, or the Evaluation Program Technical Working Group (EPTWG) to determine any conformance impacts.

## **2.2. Step #2: Notify Affected Vendors of Non-conformance**

When the Evaluation Program believes that a specific product or service (or class of products/services) is no longer conformant, the Evaluation Program will contact the affected vendors as soon as possible as well as federal agencies. Notification shall be in writing from the Program Manager. The notification shall provide as much detail as necessary to explain the non-conformance issue, expected resolution, and applicable remediation time frame. As necessary, the notification will include the rationale for the specified remediation time frame (e.g., severity level determination).

## **2.3. Step #3: Discuss Non-conformance with Affected Vendors**

The Evaluation Program may determine that direct outreach to affected vendors is useful—in addition to sending a notice. In this case, the Evaluation Program will facilitate such meetings as quickly as possible.

In addition, affected vendors may reach out to the Evaluation Program for additional information or remediation guidance. The Evaluation Program will make a good faith effort to accommodate all reasonable requests for such information. Where useful and expedient, the Evaluation Program shall agree to in-person meetings with the affected vendors.

If discussions lead the Evaluation Program to alter its view of which products or services are no longer conformant, the Evaluation Program will amend and republish its notification to applicable vendors as soon as possible.

Throughout this discussion phase, remediation timeframes remain unaltered and are not put on hold. That is, time used during this discussion phase counts towards the specified remediation timeframe.

#### **2.4. Step #4: Move Product or Service from the APL to the RPL**

If the product or service has not tested conformant by the remediation deadline, the Evaluation Program immediately removes the product/service from the APL and adds it to the RPL. All other applicable Evaluation Program lists, documents, and web pages will also be immediately updated as necessary.

### **3. Disputes**

A vendor who disputes an Evaluation Program notice regarding listing in the RPL must do so in writing within five business days of notice receipt. In all cases, the Evaluation Program will make a good faith effort to work with the vendor to resolve the dispute. During a dispute, the Evaluation Program maintains the right to move a product or service from the APL to the RPL in accordance with published criteria and timelines (e.g., FRTC severity remediation timeframes). For all dispute matters, including final determinations, the Program Manager shall make the final decisions based on the best interests of the Evaluation Program and the Federal Government.

### **4. RPL Process Maintenance**

The Evaluation Program will evolve over time. As the needs of the Evaluation Program change or become clearer, it is possible that this process document will need to evolve. The Evaluation Program is responsible for maintaining this RPL Process document.