



COMMON Certificate Policy Change Proposal Number: 2017-04

To: Federal PKI Policy Authority (FPKIPA)
From: PKI Certificate Policy Working Group (CPWG)
Subject: Proposed modifications to the COMMON Certificate Policy
Date: April 3, 2017

Title: How Long Can PIV Card Stock Be Used Once They Are Removed From the GSA Approved Products List?

**X.509 Certificate Policy For The U.S. Federal PKI Common Policy Framework
Version 1.26, February 2, 2017**

Change Advocate's Contact Information:

Name: Chi Hickey
Organization: GSA FIPS 201 Evaluation Program
Telephone number: (202) 501-1881
E-mail address: chi.hickey@gsa.gov

Organization requesting change: FPKI Certificate Policy Working Group

Change summary: Clarifying the period of time PIV card stock that has been removed from the GSA Approved Products List can be used

Background:

The FIPS 201 Evaluation Program:

- Provides a common government-wide testing capability for ICAM products and services;
- Provides FIPS 201 compliance, consistency, and alignment of commercially-available products and services with the requirements and functional needs of government ICAM implementers;
- Updates and maintains the GSA Approved Products List (APL); once products and services have passed FIPS 201 and FICAM conformance testing; they are listed on the APL
- Ensures availability, security, interoperability, and choice among vendor products to support various ICAM components; and
- Coordinates interaction with the ICAM vendor community to improve the inclusion of requirements into product offerings; and services that have been demonstrated to perform successfully.

Standardization of PIV and PIV-I Card issuance greatly contributes to achieving the objectives of interoperability across PIV and PIV-I Card Issuer implementations. For all organizations to accept the PIV and PIV-I Cards of other organizations, one set of interoperable components must be used across organizations.

OMB M-06-18 requires the procurement of products listed on the APL. This change proposal provides additional guidance to agencies about utilizing how to deal with card stock that has been removed from the APL.

Specific Changes:

Insertions are underlined, deletions are in ~~striketrough~~:

6.2.1 Cryptographic Module Standards and Controls

...

PIV Cards are PKI tokens that have private keys associated with certificates asserting id-fpki-common-authentication or id-fpki-common-cardAuth. PIV Cards shall only be issued using card stock that has been tested and approved by the FIPS 201 Evaluation Program and listed on the GSA [Approved Products List \(APL\)](#). Card stock that has been removed from the APL may continue to be issued for no more than one year after GSA approved replacement card stock is available. PIV cards issued using the deprecated card stock may continue to be used until the current subscriber certificates expire, unless otherwise notified by the FPKIPA/FPKIMA. On an annual basis, for each PCI configuration used (as defined by the FIPS 201 Evaluation Program), one populated, representative sample PIV Card shall be submitted to the FIPS 201 Evaluation Program for testing.

Delta Mapping: Not applicable

Estimated Cost: There may be a cost associated with this change due to unused card stock no longer authorized for use and the labor for reissuance if required due to critical vulnerability.

Implementation Date: This change is a clarification and is effective upon approval by the FPKIPA and incorporation into the Common Policy CP.

Prerequisites for Adoption: none

Plan to Meet Prerequisites: Not applicable

Approval and Coordination Dates:

Date presented to CPWG:	April 3, 2017
Date change released for comment:	May 17, 2017
Date comment adjudication published:	June 1, 2017