

Cmt #	Organization	Point of Contact	Comment Type (G-General, E-Editorial, T-Technical)	Section, Annex, etc. and Page Nbr	Comment (Include rationale for comment)	Proposed change
1	USDA	Owen Unangst/ Rick Holman	G	FIPS 201, Part 1: Implementation Guide Requirement A: Control Objectives (Page 5)	<p>There are several control objectives that can not be achieved solely through the deployment of improved processes planned for October 27, 2005. These are:</p> <ul style="list-style-type: none"> <li>(b) is strongly resistant to identity fraud, tampering, counterfeiting, and terrorist exploitation;</li> <li>(c) can be rapidly electronically verified.</li> </ul> <p>These control objectives must be met such that:</p> <ul style="list-style-type: none"> <li>-Fraudulent identity source documents are not accepted as genuine or unaltered;</li> <li>-An issued credential is not modified, duplicated, or forged; etc.</li> <li>-A credential remains servicable only up to its expiration date. More precisely, a revocation process exists such that expired or invalidated credentials are swiftly revoked;</li> </ul>	<p>USDA issues a variety of credentials, including plastic flash badges. The majority of current USDA credentials will not meet these criteria or control objectives.</p> <p>Because the intent of the implementation guidance is to implement the process first, followed by the new technology, USDA believes that these control objectives and implementation criteria should be implemented during the roll-out of PIV cards following October 2006.</p>
2	USDA	Owen Unangst/ Rick Holman	G	FIPS 201, Part 1: Implementation Guide Requirement B: Background Investigations (Page 5)	<p>The Department feels that a Background Investigation of extremely long term employees, who are currently satisfactorily employed should be exempt from the background investigation requirement.</p>	<p>USDA requests a "grandfather clause" for employees (not contractors) who have been employed by the Department for greater than 15 years. USDA's "average" employee has over 16 years of service - USDA requests OMB to reconsider the benefit of re-doing the BI for these persons.</p>

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3	USDA	Owen Unangst/ Rick Holman	G	FIPS 201, Part 1: Implementation Guide Requirement B: Registration Process (Page 5)	USDA requests clarification around the "end state" required by October 27, 2005. Although this date may provide enough time for USDA to assess the current identity-proofing and registration processes of our 29 Agencies and Staff Offices, this is not enough time to complete the changes and replicate them throughout the various organizations.	"Accredit a registration process consistent with the identity proofing and registration requirements in section 2.2 of the Standard. This registration process applies for all new identity credentials issued. A policy should be in place and fully implemented no later than 90 days following this deadline"
4	USDA	Owen Unangst/ Rick Holman	G	FIPS 201, Part 2: Requirement B: Credential Issuance (Page 6)	Since this new credential is required for all new employees, is the ability to successfully obtain a PIV credential a "condition of employment"?  Does this apply to existing employees as well? USDA has a number of unions for whom this would qualify as a "change in working conditions."	

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5	USDA	Owen Unangst/ Rick Holman	G	FIPS 201, Part 2: Requirement D: Identity verification (Page 6)	<p>USDA requests clarification about "identity proofing" required by September 30, 2007. Does this mean the background investigation must be complete or does this mean that the face-to-face validation of identification documents must be completed?</p> <p>If the latter, USDA is not confident that identity proofing can be complete by September 30, 2007, due to the high number of field personnel and other non-centralized USDA locations. USDA plans to prioritize the roll out of both credentials and in-person identity proofing with Mission Critical locations and Headquarters occurring first. USDA's comment is that in-person identity proofing requirements should be required by September 30, 2008.</p>	USDA's comments that in-person identity proofing requirements should be required by September 30, 2008 rather than by September 30, 2007.
6	USDA	Owen Unangst/ Rick Holman	G	FIPS 201, Part 2: Requirement E: System access (Page 6)	The digital certificate will not always be used for logical access control, and the physical access control systems have graduated security requirements and therefore a specific employee or contractor may not use the digital certificate for either logical or physical access control.	Digital certificates should not be a default requirement for every identity credential, but only for those employees and contractors who required it to access logical or physical access control systems. OMB Memorandum M-04-04 should be used to determine PKI certification requirements.

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7	USDA	Owen Unangst/ Rick Holman	G	FIPS 201, Part 2: Requirement E: System access (Page 6)	It does not appear that there are any actual dates to upgrade or integrate the Physical or Logical Access Control Systems (although there are "ideal" situations and guidance about "prioritizing" integrations.)  Is this correct?	Physical Access Control Systems will be upgraded or integrated on an as needed basis determined through a physical security assessment.
8	USDA	Owen Unangst/ Rick Holman	G	Introduction: To Whom Does This Apply: 2. Employees and Contractors (Page 3)	This directive applies to "long-term" employees or contractors. USDA would like to consider 6 months as an appropriate length of time to required "long term" status.	The six month consideration is based on Executive Order 10450.
9	USDA	Owen Unangst/ Rick Holman	G	General	Although NAC and NACI have not been spelled out in the FIPS 201 standards, or in the Implementation Guidance, it appears to have become the accepted standard for background investigations for Employees and Contractors, with NAC required prior to PIV card issuance.	Due to the length of time for the results of the NAC, USDA believes that the card should be issued upon initial results (adjudicated by the sponsoring agency.) These initial results are believed to contain the name check, however this data set will be verified with OPM prior to creating the final Implementation Plan.