

Frequently Asked Questions (FAQs)

With the signing of HSPD 12, “Policy for a Common Identification Standard for Federal Employees and Contractors,” we were directed by the President to make our facilities and information systems more secure. This cross-cutting Directive impacts many facets of your agency’s operations. To assist you in your implementation, we have prepared some frequently asked questions.

1. What is HSPD 12?

HSPD 12 requires your agency to implement a mandatory, government-wide standard for secure and reliable forms of identification for your employees and contractors. This identification will be used to access facilities and information systems.

2. To implement HSPD 12, what am I required to do by when? What flexibility do I have?

Last October, you were required to implement new ID badge issuance policies and procedures. By October 27, 2006, agencies are required to begin issuing the new ID cards to employees and contractors. You can phase in ID card issuance and the infrastructure to use the card through FY2007- FY2008, in accordance with your OMB approved implementation plan.

While there is no flexibility in when you issue the cards, agencies do have some flexibility in how they use the capabilities of the card, balancing risk with available resources. While you should take advantage of the card’s capabilities to improve security, your agency can decide to first implement at your high security facilities and implement at lower risk facilities later. You may decide not to use the card’s electronic capabilities at some facilities or to access some systems, in accordance with OMB’s guidance.

3. What should agencies do to reduce the costs of HSPD-12 implementation?

To reduce costs, we must all look at agency implementation from a “national” perspective instead of an agency-by-agency perspective. For example, every agency does not need to purchase a card registration and printing facility. These can be shared between agencies. OMB established an HSPD 12 Executive Steering Committee (the committee) to make recommendations to OMB on the best approach to reach the widely distributed Federal workforce, opportunities to leverage existing and commercial infrastructure, and how to address the remaining technical issues.

Your agency’s participation is critical to ensure success. OMB has received data from your HSPD 12 representatives on the location and numbers of your contactors and your existing infrastructure. Teams are analyzing this data to look for government-wide opportunities.

4. My agency is ready to implement, but I’ve been told there are no approved products and services. When will they be available?

In February the first service providers (commercial integrators) were made available for purchase by the agencies. Products and services will be added on a rolling basis. By the end of May, the full availability of commercial products is anticipated.

Successful implementation of HSPD 12 depends on government-wide interoperability. For one agency to read an ID issued by another agency depends on interoperability and uniform standards and specifications. Agencies are not prohibited from doing the necessary planning to be ready when products and services are available. For example, agencies can plan for the new infrastructure and validate existing employees have undergone the required background checks.

5. Given I will only have five months to implement once products are approved, will OMB move back the deadlines?

No, the deadlines were established by the President. Based on the industry response to a December 2005 GSA request for information (conducted in partnership with DHS, DOC, and DOD) industry will be ready to meet the HSPD 12 deadlines. This same conclusion was reached by the seven agencies who reviewed the industry responses.

While there is no flexibility in when you issue the cards, agencies do have some flexibility in how they use the capabilities of the card, balancing risk with available resources. While you should take advantage of the card's capabilities to improve security, your agency can decide to first implement at your high security facilities and then implement at lower risk facilities in FY2008. You may decide not to use the card's electronic capabilities at some facilities.

6. Are the Blanket Purchase Agreements established by GSA mandatory?

While Departments and agencies are encouraged to use the acquisition services provided by GSA they are not mandatory. Any agency making procurements outside of GSA vehicles for approved products must certify the products and services procured meet all applicable federal standards and requirements, ensure interoperability and conformance to applicable federal standards for the lifecycle of the components, and maintain a written plan for ensuring ongoing conformance to applicable federal standards for the lifecycle of the components. Because this certification requires considerable expertise and expense, OMB strongly encourages agencies to use the GSA services.

However, agencies will be required to implement the recommendations of the Executive Steering Committee on shared infrastructure (including shared enrollment stations, card management, identity management, card printing and personalization and PKI services).

7. As of October 2006, what capabilities does my agency have to have in place? Do I have to use the card's capabilities (e.g. at the highest security location in the agency?) Is the use of the card optional?

OMB's HSPD 12 implementation guidance does not require agencies to complete implementation of all card capabilities on October 27, 2006. For example, you are not expected to have all the infrastructure installed to enable you to use the card at all facilities and systems. It

is reasonable to take a risk-based approach and phase in use of the cards. However, use of the cards is not optional. In fact, you will see a greater return on your investment by using the cards to secure your facilities and systems.

8. If agencies are sharing resources (e.g. card printing and registration), how will funding be shared and/or transferred between agencies?

After approval of recommendations for agencies (first draft is expected April 30th), OMB will provide guidance to agencies and GSA will revise their acquisition approach as appropriate. All agencies are responsible for executing the recommendations as part of their implementation plan. If, as expected, the recommendations include the sharing of resources, the ESC will approve a mechanism (i.e. MOU, contract or other) to promote collaborative implementation of HSPD-12. The ESC will establish a team to look at the several options for sharing funding. The team will meet during April and May.

9. My agency is looking for additional information regarding GSA interoperability testing. Where can I find a list of the product test plans and tested products, a copy of the interoperability requirements and the technical specifications?

The status on the GSA interoperability testing is posted at <http://www.smart.gov/fips201apl/>. The site will be updated as information becomes available. The status of the NIST conformance testing is posted at <http://csrc.nist.gov/npivp/>.

10. My agency understands the strategy for front-end registration and card issuance. How will the ESC address legacy identity management and building access systems and interfaces with agency access systems? These areas have potentially significant cost implications. What is the strategy in these areas?

The ESC will approve a conceptual design and architecture outlining which business process can be shared between agencies. Then the ESC technical working group will define the necessary interfaces between the shared systems and the agency specific components (like the building access systems). Anticipate a number of activities (i.e. legacy identity management and building access systems) will remain the purview of the agencies.

11. Who are the agencies and members supporting each of the working groups?

This information is provided in a separate attachment which will be sent to all of the Executive Session meeting attendees. All agencies are welcome to participate in the various committees.

12. Will the recommendations developed by the ESC meet agency specific requirements (e.g. my agency requires card issuance to occur in one day)?

To achieve government-wide interoperability and cost savings, some compromises will occur between the agreed upon government-wide requirements and agency specific needs. Some agency specific needs will be accommodated, some will not. For example, the requirement to issue a card in one day may not be cost effective given the cost savings generated from shared

printing facilities. The ESC working groups will develop these requirements, based on agency feedback.

13. Has the CONOPS for a shared identity management system and card management system been published and is it available for review?

No, a CONOPS has not been published. One of the ESC tasks (Number 5) requires the development (and subsequent ESC approval) of the conceptual design and architecture for HSPD 12. This document will be provided to agencies for comment in mid-March. The technical design and architecture is scheduled for approval on April 1, 2006.

14. Has a HSPD 12 compliant system been deployed to a production environment? If not, when is the compliant system scheduled to be deployed?

No, a compliant HSPD 12 compliant system has not been deployed. According to the ESC action plan, before agency implementation, the recommended solutions and components will be tested to ensure conformance with the standards by July 31, 2006. Agency execution will begin in August.

15. What should small agencies be doing right now?

Small agencies will benefit from the government-wide strategy. As the strategy develops over the next few months, there are certain steps agencies should take. Agencies should ensure all employees and contractors have the minimum required background investigations. Agencies should develop a schedule for completion to cover those individuals who do not have the minimum required background investigation.

As part of the conceptual design and architecture product, certain activities/components will be designated as an agency responsibility. For example, agencies will be responsible for sponsor notification and authorization and for the policies related to card lifecycle management. Agencies should plan for the installation of the infrastructure to use the card for physical and logical access (includes card readers) and for the integration with existing systems.

16. How will GSA ensure agencies are not purchasing “excess” equipment?

The OMB HSPD 12 implementation guidance (OMB Memorandum 05-24), designates GSA as the “executive agent for Government-wide acquisitions of information technology” for the products and services required to implement HSPD 12.

GSA will make approved products and services available through blanket purchase agreements (BPA) under Federal Supply Schedule 70 and ensure all approved suppliers provide products and services meet the HSPD 12 standards. This will provide GSA oversight over what products and services agencies are purchasing. GSA will conduct bulk purchases of the required products to ensure the lowest possible cost and execute the ESC approved strategy.

17. Is there a requirement to conduct a new background investigation every 5 years?

No, there is no government-wide requirement for agencies to conduct a new National Agency Check with Written Inquiries (NACI) every five years upon reissuance of the a card. However, agencies are permitted by OPM to establish a reinvestigation requirement if this is an agency specific requirement.

18. Beginning October 27, 2006, are all new federal employees and contractors required to receive a new HSPD 12 compliant ID?

After October 27, 2006, the date new employees and contractors receive a new HSPD 12 compliant ID is dependant on several factors. It depends on the risk profile of the facility, the approved ESC strategy for the geographic diversity of registration stations and your agency's approved implementation plan. As an example, your agency can have new employees and contractors who are starting work at a facility (after October 27, 2006) without the card issuance infrastructure in place (because it is low risk) who will not receive their card immediately.

19. How does the ESC strategy impact my current plans? For example, I was planning to purchase card registration stations for my agency's use?

It is likely not cost-effective for every agency to purchase their own registration stations, especially in areas outside the National Capital Region. As part of the ESC strategy, agencies may have to revisit their current plans.

20. Will certified products meet certain security requirements (e.g. C&A)? Can these requirements be used by the agencies in their implementations?

Yes, the selection of any alternatives for government-wide implementation must be compliant with all applicable law and policy, including IT security. However, agencies will still need to meet certain security requirements for the systems they maintain, including integration with existing systems.

21. GSA advised that two FAR cases have been submitted (2005-15, 2005-17) that will require agencies to use GSA BPA for purchase of HSPD-12 compliant cards and hardware. Have those two cases been approved and included in the FAR?

Agencies can track the status of the FAR cases at:

<http://www.acq.osd.mil/dpap/dars/opencases/farcasenum/far.pdf>. Case 2005-15 (Common Identification Standard for Contractors) was published as an interim rule on January 3, 2006 (71 FR 2008). The comment period closed March 6th and the FAR Council is now reviewing the public comments. Case 2005-17 (Requirement to Purchase Specified Products/Services) is with the GSA Legal Office for review.