



Common Policy CP Change Proposal Number: 2009-02

To: Federal PKI Policy Authority
From: FPKI Certificate Policy Working Group
Subject: Proposed modifications to the Common Policy CP
Date: March 5, 2009

Title: Change to the Common Policy CP that would allow the use of the PIV Authentication certificate as proof of identity and employment.

Version and Date of Certificate Policy Requested to be changed:

X.509 Certificate Policy for the U.S. Federal PKI Common Policy Framework, Version 3647 – 1.6, dated February 11, 2009.

Change Advocates Contact Information:

Mark Silverman, NIH
(301) 496-2317
mls@nih.gov

Organization requesting change: National Institutes of Health, Department of Health and Human Services

Background: PKI-enabled authentication should be permitted as proof of identity in lieu of digital signatures, wherever possible, when sponsoring contractors and other affiliated personnel. The current version of the Common Policy CP requires that the identity of the sponsor be verified through either a digital signature or in-person identity proofing. The recommended change permits the use of the sponsoring federal agency employee's PIV Authentication certificate as proof of identity and employment.

Change summary: Allow the use of the PIV Authentication certificate as proof of identity and employment of the sponsoring federal agency employee.

Specific Changes: Specific changes to Section 3.2.3.1 listed below. Text with ~~striketrough~~ will be removed. Underlined text will be added.

For contractors and other affiliated personnel, the authentication procedures must include the following steps:

- 1) Verify that a request for certificate issuance to the applicant was submitted by an authorized sponsoring agency employee (e.g., contracting officer or contracting officer's technical representative).

2) Verify sponsoring agency employee's identity and employment through either one of the following methods:

- a) ~~A digitally signed~~ request from the sponsoring agency employee, verified by a currently valid employee signature certificate issued by the an agency CA, may be accepted as proof of both employment and identity, or
- b) ~~Employee's identity shall be established by in-person proofing before the registration authority as in employee authentication above and employment validated through use of the official agency records. Authentication of the sponsoring agency employee with a valid employee PIV-authentication certificate issued by the agency may be accepted as proof of both employment and identity, or~~
- c) In-person identity proofing of the sponsoring agency employee may be established before the registration authority as specified in employee authentication above and employment validated through use of the official agency records.

Estimated Cost:

There is no financial cost associated with implementing this change.

Implementation Date:

This change proposal will be implemented immediately upon approval by the FPKIPA and incorporation into the Common Policy CP.

Prerequisites for Adoption:

There are no prerequisites.

Plan to Meet Prerequisites:

There are no prerequisites.

Approval and Coordination Dates:

Date presented to CPWG: March 5, 2009

Date CPWG recommended approval: April 2, 2009

Date presented to FPKIPA: April 14, 2009

Date of approval by FPKIPA: April 14, 2009