Acquisitions Related to Compliance with HSPD-12 and FIPS 201 Requirements

Ordering Activity Information:
New guidance specific to acquisitions of products and services for compliance with NIST FIPS 201 was recently issued. Agencies are referred to the following published guidance:

1. OMB Memorandum 05-24, Implementation of Homeland Security Presidential Directive (HSPD) 12 – Policy for a Common Identification Standard for Federal Employees and Contractors, dated August 5, 2005, available at: http://www.whitehouse.gov/omb/memoranda/fy2005/m05-24.pdf.

2. GSA Memorandum, dated August 5, 2005, Acquisitions of Products and Services for Implementation of HSPD-12, available at: http://www.cio.gov/eauthentication.

Key acquisition points directed by OMB M-05-24:

- To ensure government-wide interoperability, agencies must acquire only products and services that are on the approved products list;
- Agencies must include language implementing the FIPS 201 Standard in applicable new contracts;
- GSA has been designated as the "executive agent for Government-wide acquisitions of information technology" under the Clinger-Cohen Act for the products and services required by HSPD-12;
- GSA will make approved products and services available through blanket purchase agreements under Federal Supply Schedule 70 for Information Technology;
- GSA will ensure all approved suppliers provide products and services that meet all applicable federal standards and requirements;
- Departments and agencies are encouraged to use the acquisition services provided by GSA;
- Agencies "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."

Key points of the GSA Memorandum:

- GSA has established SIN 132-60 under IT Schedule 70 for acquisitions of Authentication products and services;
- The current Smart Access Common ID GWAC has been the primary acquisition vehicle for smart card related products and services; this expires in May 2006;
- The GWAC will be replaced by a BPA for acquisition of approved, FIPS 201 compliant products and services;
- All <u>new</u> Task Orders on the existing GWAC will be reviewed and approved by GSA to ensure that each includes language that ensures compliance with FIPS 201.

CAUTION for Agencies: Ordering entities should note that products/services purchased directly under the IT Schedule, but NOT under the Smartcard Access ID Card GWAC or the replacement BPA (when in place) are NOT approved, HSPD-12-compliant products and services. This caution applies to all the authentication products/services business lines purchased directly under IT Schedule 70.

Information for Prospective Vendors of HSPD-12/FIPS 201 – compliant products and services:
Prospective vendors of HSPD-12/FIPS 201 – compliant products and services under the new BPA must undergo a prescribed process to ensure adherence to FIPS-201 requirements for functionality and interoperability, and each product/service must be approved by the established Federal government authority. Vendors will be provided detailed information on this website that addresses the requirements and responsibilities evaluated under this process. This information will be available by October 2005.

Prospective Vendors for Other Authentication Products and Services:
GSA is making multiple authentication products and services available through Special Item Number (SIN) 132-60, Authentication Products and Services, under Federal Supply Information Technology (IT) Schedule 70. GSA will issue specific requirements for these authentication service lines through specific Blanket Purchase Agreements (BPAs). Prospective vendors for Authentication Products and Services must be qualified in order to be approved to sell approved products/services to agencies. GSA will establish and publish procedures for applying and qualifying for each BPA. The procedures required to gain approval to sell on the specific BPA will define (any) pre-requisite qualification requirements, application procedures, evaluation procedures, and ongoing qualification requirements once approved.

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GENERAL AUTHENTICATION ACQUISITION STRATEGY

Authentication Products and Services - Overall Acquisition Approach:
To enable the President's Management Agenda for E-Government and improve federal security, GSA has been designated by the Office of Management and Budget (OMB) as the lead agency for providing authentication services to federal agencies. Agencies are to use the approved authentication services of the Authentication Services Component and not attempt to develop or acquire services outside of the approved products/services. In this way, secure and interoperable services can be ensured government-wide while avoiding redundant costs and burden of each federal agency re-creating separate infrastructure.

The full range of products/services that comprise the Authentication Service Component include:

- E-Authentication Credential Services
- E-Authentication Approved SAML Products
- Access Certificates for Electronic Services (ACES)
- Approved Personal Identify Verification (PIV) Products and Services (FIPS 201 compliant), including Smart Access ID Card Services
- Shared Service Providers' (SSP) Digital certificates and PKI services under the Federal PKI Common Policy.

Access to Approved Authentication Products and Services:
All authentication service lines will be offered through IT Schedule 70. The Federal Supply Service FSS will provide contract services for authentication services in the same manner as other IT services on the GSA Schedules program. E-Authentication services, smart card services, and PKI services will be provided under IT Schedules 70: SIN 132-60, Authentication Products and Services.

For agency access to policy and standards-compliant products and services, GSA will put a BPA in place for each product/service line, or a combination of related service lines. An open Request for Quotation will be conducted for vendors to qualify goods/services on each BPA. Only vendors currently on IT Schedule 70 and vendors that have applied to be on Schedule will be allowed to respond to the BPA. The requirements for qualifying products/services will be presented in each BPA, and each BPA will have a defined approval process for qualifying products/services. The period of performance for the BPAs may be designated as a defined window or may be an open and ongoing solicitation, as determined appropriate by GSA.

In general, each BPA will be structured to provide multiple approved products/services to maximize competition and agency choice. However, GSA may provide a BPA with a single vendor if deemed in the best interest of government. GSA will administer each BPA as well as any ongoing requirements for products/services to remain approved products on the BPA. If services/products that have been approved for any BPA are found to no longer comply with BPA requirements, GSA may rescind approval and remove the vendor from the BPA. Removal from the BPA will not affect the vendors' status and service offerings on FSS Schedules.

Agencies may issue task orders on the BPAs or GSA may order directly on behalf of agencies, as determined appropriate for purposes of efficiency and administrative management. Approval or non-approval for vendors to offer products/services under any BPA will not affect the availability of the vendors' products/services to state/local governments under the E-Government Act of 2002. The Program Management Office (PMO) will determine whether state/local governments will be able to order directly from any ASC BPA. A FAR deviation for commercial availability will be sought for any authentication service line where GSA determines that commercial availability would be appropriate and in the best interest of government.