

	<b>DEPARTMENT OF COMMERCE</b> National Institute of Standards and Technology National Voluntary Laboratory Accreditation Program	<b>ISSUE DATE:</b> January 7, 2008
	<b>LAB BULLETIN</b>	<b>NUMBER:</b> LB-29-2008
		<b>LAP:</b> ITST: Common Criteria Testing
<b>SUBJECT:</b> Revision of NIST Handbook 150-20, Sections 3.3.3, 3.3.4 and Annex B		

NIST Handbook 150-20, *NVLAP Information Technology Security Testing: Common Criteria*, was published in 2005.

Sections 3.3.3, 3.3.4 and Annex B have been revised. We are de-coupling the requirement to participate in a proficiency test at or near the time of a laboratory's on-site assessment date. Proficiency testing and on-site assessments are two critical, but separate, activities in the accreditation process and it is extremely resource-intensive to require both within a very short period of time. These new requirements for proficiency testing now more nearly track other NVLAP laboratory accreditation programs. A demonstration of proficiency will now be required:

- Every 3 years;
- When a product fails two Validation Oversight Reviews (VORs) during the course of its evaluation by the CCTL; or
- At any other time the Common Criteria Evaluation and Validation Scheme (CCEVS) determines proficiency testing is necessary.

In addition, a proficiency test may now be less than a full evaluation under TOP oversight and at an EAL level less than a laboratory's scope of accreditation. New requirements are that a single ADV/ATE TOP of one week duration will be used for proficiency demonstrations instead of a full ADV/ATE VOR for an evaluation.

Proficiency tests can occur any time within a laboratory's accreditation cycle. A laboratory shall successfully complete all proficiency tests requested in order to maintain its accreditation.

**The revisions in the main body of the handbook are as follows:**

**3.3.3** NIAP CCEVS may require that the laboratory demonstrate its continued proficiency to perform Common Criteria evaluations by the laboratory providing its schedule for upcoming tests on vendor's products, determining in consultation with CCEVS which test to use as a proficiency test, and providing all records of the test selected by CCEVS technical assessors to CCEVS. Upon notification by NVLAP of an upcoming proficiency test, this evaluation shall be pre-arranged with CCEVS and shall be, in so far as possible, at the highest EAL for which accreditation has been granted. CCEVS assessors will spend one week on the evaluation, with the laboratory providing on-call support for clarifications or additional information. At the completion of the evaluation, CCEVS will report to NVLAP the results of the proficiency test. This proficiency test evaluation will serve to meet the NVLAP proficiency testing requirement. Annex B (normative) describes the process to be followed.

**3.3.4** In so far as possible, the laboratory scope of accreditation will be based upon the EAL of the proficiency test. If a laboratory does not demonstrate proficiency at its highest scope of accreditation in two consecutive proficiency tests, its scope of accreditation will be reduced to the EAL of the most recent

proficiency test.

The revised Annex B (attached to this bulletin) supersedes and replaces Annex B in NIST Handbook 150-20:2005.

Questions concerning the revised handbook or requirements for accreditation should be directed to Carroll Brickenkamp, <carroll.brickenkamp@nist.gov>, 301-975-4679.

## **Annex B** (normative)

### **Renewal of accreditation and proficiency testing**

Accredited laboratories shall renew their accreditation annually. However, the activities and fees associated with renewal will vary depending upon the year in which accreditation is being renewed. In the first renewal year and every two years thereafter, an on-site assessment of the laboratory is conducted to determine compliance with the NVLAP criteria. There is an additional fee for on-site assessments and the laboratory shall coordinate a mutually acceptable date for this on-site assessment. In those renewal years when there is no on-site assessment, the laboratory completes and returns the NVLAP renewal forms and pays the NVLAP fees.

Proficiency tests will be required on a continuing basis for the laboratory to demonstrate its continued proficiency to perform Common Criteria evaluations. A CCTL demonstration of proficiency will be required:

- Every 3 years;
- When a product fails two VORs during the course of its evaluation by the CCTL; or
- At any other time that CCEVS determines proficiency testing is necessary.

A single ADV/ATE TOP will be used for proficiency demonstrations in place of a normal ADV/ATE VOR for an evaluation. The proficiency test will consist of the CCTL sending its Evaluation Test Reports (ETRs) (and other records as needed), as well as all the developer's evidence to CCEVS.<sup>1</sup> The CCEVS TOP members will spend one week reviewing the developer evidence and the CCTL's analyses/findings. The CCEVS TOP members will meet with the CCTL's evaluation team during the course of the week as necessary to discuss the evaluation material. The results of the proficiency test will be captured by the TOP in a report, which is provided to CCEVS and NVLAP.

Successful completion of all proficiency tests is required for continuing accreditation irrespective of which accreditation year the ADV/ATE TOP is conducted.

The matrix that follows describes the proficiency testing process.

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<sup>1</sup> It is understood that in some rare cases source code may not be provided by the CCTL. If this situation arises, arrangements will have to be made to allow the TOP members access to source code. Depending on logistics, this may impact the TOP's ability to perform all necessary activities in one week.

**Proficiency Testing Matrix**

<b>No.</b>	<b>LABORATORY</b>	<b>NIAP/CCEVS</b>	<b>NVLAP</b>
<b>1</b>	<p>When notified by NVLAP of an upcoming proficiency test, the CCTL will provide CCEVS with a list of its expected evaluations in the coming 6 months.</p>	<p>CCEVS will work with each CCTL to select an appropriate evaluation for the proficiency test.</p> <p>Because TOEs can vary in complexity, CCEVS must ensure that the TOE, and hence the evaluation work involved in evaluating that TOE, will provide the evidence needed for CCEVS to verify the laboratory's proficiency.</p> <p>It is important to note that the laboratory shall demonstrate proficiency at its current highest scope of accreditation.</p>	<p>NVLAP will issue a letter to selected or all CCTL laboratories that a proficiency test will be conducted and that each CCTL shall provide CCEVS with a list of its expected evaluations.</p>
<b>2</b>	<p>a) The CCTL will be notified by CCEVS which upcoming evaluation will be selected for the proficiency test.  b) A date will be negotiated with CCEVS for the TOP.  c) The CCTL will make available to CCEVS TOP members all evaluation evidence for the selected evaluation. This submission includes all TOE/developer evidence, and CCTL generated material (e.g., ETRs, records) including any intermediate results and analysis that support the ETR conclusions. The CCTL will also provide its most current quality system documentation, including but not limited to: record generating and storage procedures and training procedures.</p>	<p>a) An upcoming evaluation will be selected for the proficiency test.  b) A date will be negotiated with the CCTL for the TOP.  c) Approximately one week prior to the TOP, CCEVS will review the CCTL submission to ensure its completeness.  d) If the information is incomplete, CCEVS will generate a list of missing or incomplete evidence and supply that to the laboratory.  e) The TOP will be rescheduled when all TOP members are again available.</p>	

### Proficiency Testing Matrix

No.	LABORATORY	NIAP/CCEVS	NVLAP
3	<p>Proficiency Test Evaluation: Initial Meeting: The CCTL will meet with the TOP and provide a presentation of TOE, TOE evidence and CCTL findings. This meeting should take no more than half a day. The intent of this meeting is to allow the TOP to quickly focus their analysis on areas of interest with the TOE and the CCTL findings by using the information provided during the briefings as background.</p> <p>During this session, the CCTL will be expected to present</p> <ul style="list-style-type: none"> <li>• a functional overview of the TOE</li> <li>• an overview of the TOE design and TSFI</li> <li>• a summary of the analysis performed by the CCTL</li> <li>• the CCTL findings.</li> </ul> <p>At the conclusion of this initial meeting the TOP will review the provided material.</p> <p>During the course of the week, at least one CCTL evaluation team member will be made available during the week so that the TOP can contact the laboratory to clarify any issues.</p>	<p>The TOP will (at a minimum) examine the CCTL's work in the following areas during each proficiency demonstration:</p> <ul style="list-style-type: none"> <li>• TOE Security Function Interface (TSFI)</li> <li>• Analysis of the TOE design details, including analysis of consistency of the design decomposition descriptions</li> <li>• Test coverage and depth</li> <li>• Test procedures that effectively test TOE functionality</li> <li>• Vulnerability analysis</li> <li>• Use of quality system and its procedures</li> <li>• Records generated during the evaluation</li> </ul> <p>After initial meeting with the CCTL, the TOP will spend the rest of the week reviewing the documentation.</p> <p>During the week, the TOP will contact the CCTL evaluation team to discuss any issues or ask clarifying questions. The intent is that the TOP perform their assessment of the evidence, as well as the evaluation team's understanding of the TOE and work performed. It is understood that assessing the evaluation team's efforts may not be possible without interacting with the evaluation team.</p>	<p>NVLAP will monitor the progress of the proficiency test and may observe TOP meetings with the CCTL.</p>
4	<p>Proficiency Test Evaluation Midweek Status Update: the TOP will conduct a teleconference/meeting with the CCTL.</p>	<p>Midweek Status Update: the TOP will conduct a teleconference/meeting with the CCTL. The intent of this meeting is to provide the CCTL with status from the TOP. During this meeting the TOP will provide the CCTL with any preliminary findings and work with the CCTL to clarify any CCTL results and/or TOE evidence with which the TOP has questions.</p>	

### Proficiency Testing Matrix

No.	LABORATORY	NIAP/CCEVS	NVLAP
5	<p>Proficiency Test Evaluation NIAP assessor(s) out brief: This briefing will provide the CCTL with a verbal summary of the TOP results, including all findings that will appear in the written CCEVS assessment report.</p> <p>If findings are “further work required,” follow-up actions are required to be performed by the laboratory in order to demonstrate successful completion of the proficiency test.</p> <p>CCTL may choose to write a response to the findings.</p>	<p>a) The TOP will provide a written TOP Report to CCEVS management including a recommended finding of proficiency. Findings will be one of the following:</p> <ol style="list-style-type: none"> <li>1. Pass: no further work required.</li> <li>2. Further work required*; and</li> <li>3. Fail**</li> </ol> <p>b) CCEVS will review the recommendation and issue a formal report.</p> <p>c) If the finding is “further work required,” follow-up actions shall be performed by the laboratory. The resolution of the follow-up actions is reviewed by the TOP and, if acceptable, a verdict of Pass will be rendered.</p> <p>d) Once any necessary follow-up actions have been taken by the laboratory, CCEVS will notify laboratory and NVLAP of the results of the laboratory’s proficiency test.</p> <p>The TOP will always generate a written report. In the case of a Pass or Fail, this report will materially be the same report that CCEVS provides to NVLAP. In the case of further work required, the TOP will update the TOP report to reflect the follow-on activities. This could result in a Pass or Fail, and this updated TOP report is what will be provided to NVLAP. CCEVS will also provide a copy of this report to the vendor/sponsor of the product that was the subject of the TOP</p> <p>*Follow-up actions will be documented in the TOP report; they shall be addressed by the CCTL.</p> <p>**Fail: The TOP findings indicate that the CCTL has not applied the expertise and/or resources to successfully complete the evaluation.</p>	<p>NVLAP will review the CCEVS report, focusing on nonconformities, comments, and concerns from CCEVS.</p> <p>Successful completion of the proficiency test (“Pass”) by the CCTL is required for continuing accreditation.</p> <p>NVLAP may take the actions documented in NIST Handbook 150-20, 3.5.</p>