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Subject: EPA Comments on Department of Commerce, Technology Administration,
National Institute of Standards and Technology,
Draft Federal Information Processing Standard Publication 201,
Federal Identity Verification Standard
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The Environmental Protection Agency (EPA) appreciates the opportunity to comment on the subject draft standard given its importance within the Federal Government in planning and implementing Homeland Security Presidential Directive 12 - Policy for a Common Identification Standard for Federal Employees and Contractors. We have reviewed the draft standard from a physical and logical perspective, and developed the following general and substantive comments to improve the overall quality of the document and seek clarification, where appropriate.

GENERAL COMMENTS:

The draft standard needs a comprehensive editorial review to correct grammar and spelling mistakes, including, but not limited to:

- Page 4: Explanation Section, Second Paragraph, Second Sentence - There is an extra period at the end of the sentence.
- Pages 12-17: Glossary of Terms - Suggest adding the following terms to the glossary: applicants, requesting officials, approving officials, and PIV card issuers (referenced on Page 20); as well as Registration Authority (referenced on Page 30).
- Pages 17-18: Acronyms - Suggest adding acronyms and abbreviations to the list that are frequently used throughout the document. For example, the acronym FASC-N is used several times in the document; however, it does not appear on the list.
- Pages 21-22: Section 4.1 - The acronym for Federal Agency Smart Card Identification Number (FASC-N) is used inconsistently throughout the document. For example, the acronym FACS-N is referenced on Page 21, whereas the acronym FASC-N is referenced on Page 22. Please standardize the acronym throughout the document
- Page 30: Section 5.2, First Sentence - The word expect should be changed to except.
- Page 47: Third Paragraph, First Sentence - A space is needed between the words subject and Name.
- Page 47: Fourth Paragraph, Second Sentence - The word doe needs to be

changes to does.

- Page 48: First Full Paragraph, Third and Fourth Sentences - The acronym CRLs is used inconsistently in the two sentences (CRLs and CRLS). Please ensure the acronym is standardized throughout the document.

- Page 48: Third Full Paragraph, Third Sentence - The word he needs to be deleted from the sentence.

- Page 51: Section 8.2.1, Second Paragraph, Third Sentence - There is an extra period at the end of the sentence.

- Page 65: Section B.8, Last Sentence - There is an extra period at the end of the sentence in parenthesis.

Additionally, the formatting of the document can be improved through implementing the following recommendations:

- Page 9: The Table of Contents should include a list of tables to coincide with the table of figures.

- Page 22: The last sentence on the page references a figure below (Figure 4-1); however, the figure is on the next page (Page 23). Recommend rewording the sentence to indicate the figure is on Page 23.

- Page 26: The next to last sentence on the page references a figure below (Figure 4-2); however, the figure is on the next page (Page 27). Recommend rewording the sentence in question to indicate the figure is on Page 27.

SUBSTANTIVE COMMENTS:

Page 19: Section 3, First Paragraph, Second Sentence - Currently, the only non-federal employees covered by the draft standard are contractors; however, EPA has numerous non-federal employees (more than 2,500) on-site who are not contractors, including grantees, visiting scientists, interns, and students. We recommend the draft standard be expanded to cover these other non-federal employees, so we can issue them PIV cards under the auspices of the standard.

Page 21: Section 4.1, Second Paragraph, Second Sentence - This sentence implies that contractors will be issuing PIV cards to their employees in a manner that conforms to the draft standard. We believe that the contractors should not have any role in the administration or management of issuing PIV cards to their employees. This responsibility should rest solely with the Federal Government to ensure the safety and security of Government employees,

infrastructures, and assets. As a result, we recommend the standard be revised to reflect this important distinction.

Pages 28-31: Section 5 - It appears that this section is applicable to both federal and contractor employees (please confirm). If that is the case, EPA is requesting clarification as to whether the Department of Commerce is mandating that contractor employees now undergo a federal background check in order to be issued a PIV card (e.g., Will contractor employee investigations have to be conducted by OPM, and initiated and adjudicated by Agencies and Departments?). Currently, there is no federal mandate to conduct federal background checks on non-federal employees, so this will be a significant change in federal policy creating more financial and operational burden on OPM and the rest of the Federal Government.

Pages 28-29: Section 5.1 - It is not clear how the position sensitivity levels in Tables 5-1 and 5-2 correlate to OPM's risk designation levels (please elaborate). Additionally, it appears the Department of Commerce is mandating that Agencies and Departments designate position sensitivity levels for contractors being issued PIV cards. If that is the Department of Commerce's intent, it will be quite labor intensive for the Government to develop and implement a process for complying with this mandate. Please provide more details on your intentions in the final standard.

Page 31: Section 5.4 - It does not appear that the Department of Commerce is establishing a standardized time requirement for PIV card renewal. EPA requests that a specific time requirement be established in the final standard, so federal and non-federal employees will have to renew their PIV cards on a regular basis (for example, every three years appears fair and reasonable).

Page 50: Section 8.1 - EPA recommends that a set limit on the number of guesses (for example, three to five guesses seems like a reasonable number) be established within the final standard to minimize the potential for an adversary to gain unlawful access to federal physical or logical infrastructures.

Please let us know if you have any questions or need additional information. Once again, thank you for the opportunity to review and comment on the subject draft standard.

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