

United States
Department of
Agriculture



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TO: FIPS 201 Development Team
National Institute of Standards and Technology
Department of Commerce

FROM: Chris Niedermayer \Owen Unangst, Acting\
Associate Chief Information Officer
Department of Agriculture

SUBJECT: Comments on FIPS 201 Standard Public Draft

As requested by NIST, USDA has compiled all comments on the Public Draft of the FIPS 201 standard into the attached spreadsheet. These comments are the sum of comments from USDA Physical Security, Cyber Security, and Personnel Security offices as well as the USDA, eAuthentication Team (including our PKI Subteam).

Our first major concern is the requirement of PKI for 100% of the user population. USDA has adopted NIST's Special Publication 800-63 for providing access to online applications. USDA has a wide variety of users, and for many of these a Level 2 provides adequate protection. FIPS 201 seems to override these previous thoughts, and we do not agree on the need nor do we agree with the extra cost of this new decision.

Secondly, we feel that the Identity Proofing process should be separated completely from the Background check process. As part of the Identity Proofing process, we suggest one standard process that is not based on position sensitivity. Completion of background checks would be a requirement for access to certain facilities and systems, but should not be a roadblock in the card issuance process.

Third, we feel that the number of distinct roles required in the issuance process is excessive. We understand the need for separation of duties, but the separation should be logical and should not adversely affect efficiency. We have reviewed the Interagency Advisory Board's (IAB's) suggested modifications to your draft, and we support their simplified role structure.

Finally, USDA is very interested in participating in further conversations on how to implement card production, activation and issuance. Our National Finance Center (NFC) performs payroll functions for over 500,000 Federal employees and we believe that leveraging their existing infrastructure for some of these activities will be beneficial to the Government and taxpayers, alike.

Our specific comments on content within the draft FIPS 201 standard are included in the attached spreadsheet.

USDA appreciates the opportunity to provide comments on this standard.

If you have any questions, please feel free to contact Owen Unangst, USDA's eAuthentication Project Manager, at 970 295-5538 or by email at owen.unangst@usda.gov .

