



FBCA Policy Change Proposal Number: 2010-02

To: Federal PKI Policy Authority
From: FPKI Certificate Policy Working Group
Subject: Proposed modifications to the FBCA Certificate Policy
Date: January 6, 2010

Title: Change to FBCA Policy CP to specify requirement for Background Check Refresh

Version and Date of Certificate Policy Requested to be changed: X.509 Certificate Policy for the Federal Bridge Certification Authority (FBCA) Version 2.21, December 16, 2010.

Change Advocate's Contact Information:

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Organization requesting change: FPKI Certificate Policy Working Group

Change summary: This change proposal requires a refresh of background checks for Trusted Roles once every five years.

Background:

CertiPath recently conducted a certificate policy mapping analysis of the CertiPath Bridge CA CP against the FBCA CP and found a number of issues. These issues were discussed at FPKI CPWG meetings in November and December 2010 and it was agreed that change proposals were required for any unresolved issues.

One of the issues identified by CertiPath is that background checks for Trusted Roles are only required once.

Specific Changes:

Insertions are underlined, deletions are in ~~striketrough~~:

5.3.2 Background Check Procedures

FPKI Management Authority personnel acting in trusted roles shall, at a minimum, undergo procedures necessary to be cleared at the TOP SECRET level.

Entity CA personnel shall, at a minimum, pass a background investigation covering the following areas:

[...]

Adjudication of the background investigation shall be performed by a competent adjudication authority using a process consistent with Executive Order 12968 August 1995 or later, or an equivalent level of investigation and adjudication.

If a formal clearance or other check is the basis for background check, the background refresh shall be in accordance with the corresponding formal clearance or other check. Otherwise, the background check shall be refreshed every ten years.

Estimated Cost:

There is no cost expected for Federal Agencies.

Implementation Date:

Entity CAs will have one year, from the date of approval by the FPKIPA, to implement this change.

Prerequisites for Adoption:

There are no prerequisites.

Plan to Meet Prerequisites:

Not Applicable.

Approval and Coordination Dates:

Date presented to CPWG: December 21, 2010, January 6, 2011

Date presented to FPKIPA: January 20, 2011

Date of approval by FPKIPA: TBD