



COMMON Certificate Policy Change Proposal Number: 2018-02

To: Federal PKI Policy Authority (FPKIPA)
From: PKI Certificate Policy Working Group (CPWG)
Subject: Update Common Policy to reference Annual Review Requirements
Date: July 5, 2017

Title: Update Common Policy to reference Annual Review Requirements

**X.509 Certificate Policy For The U.S. Federal PKI Common Policy Framework
Version 1.28, April 4, 2018**

Change Advocate's Contact Information:

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Organization requesting change: N/A

Change summary: Update the CP to reference FPKI Annual Review Requirements

Background:

The FPKI Audit Compliance Guide has been superseded by the Annual Review Requirements. This change updates the Common Policy to include the new document reference.

Specific Changes:

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

8 COMPLIANCE AUDIT AND OTHER ASSESSMENTS

CAs operating under this policy are subject to an annual review by the FPKIPA to ensure their policies and operations remain compliant with this policy.

CAs operating under this policy shall have a compliance audit mechanism in place to ensure that the requirements of their CPS are being implemented and enforced. The SSP PMA shall be responsible for ensuring audits are conducted for all PKI functions regardless of how or by whom the PKI components are managed and operated.

For the Common Policy Root CA, the FPKIMA shall have a compliance audit mechanism in place to ensure that the requirements of this CP are being implemented and enforced by its CPS.

This specification does not impose a requirement for any particular assessment methodology.

8.1 FREQUENCY OR CIRCUMSTANCES OF ASSESSMENT

CAs and RAs operating under this policy shall be subject to a periodic compliance audit at least once per year in accordance with the [FPKI Compliance Audit Requirements](#) [FPKI Annual Review Requirements](#) document [AUDIT].

Further, the FPKIPA has the right to require aperiodic compliance audits of CAs operating under this policy. The FPKIPA shall state the reason for any aperiodic compliance audit.

8.6 COMMUNICATION OF RESULTS

On an annual basis, an Auditor Letter of Compliance, prepared in accordance with the [FPKI Compliance Audit Annual Review Requirements](#) document, on behalf of an Agency PMA shall be provided to the SSP.

On an annual basis, the SSP PMA shall submit an ~~audit compliance~~ annual review package to the FPKIPA. This package shall be prepared by the SSP PMA, in accordance with the [FPKI Compliance Audit Annual Review Requirements](#) document, and includes an assertion from the SSP PMA that all PKI components have been audited - including any components that may be separately managed and operated. The report shall identify the versions of this CP and the CPS used in the assessment. Additionally, where necessary, the results shall be communicated as set forth in section 8.5 above.

10 BIBLIOGRAPHY

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| AUDIT | FPKI Compliance Audit Annual Review Requirements http://www.idmanagement.gov/fpkipa/documents/FPKI%20Compliance%20Audit%20Requirements.doc https://www.idmanagement.gov/wp-content/uploads/sites/1171/uploads/annual-review-requirements.pdf |
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Estimated Cost: There may be an additional cost to organizations to fully comply with the FPKI Annual Review Requirements

Implementation Date: Organizations must comply with the Annual Review Requirements at their next annual review.

Prerequisites for Adoption: none

Plan to Meet Prerequisites: Not applicable

Approval and Coordination Dates:

Date presented to CPWG: July 18, 2017

Date change released for comment: July 18, 2017

Date comment adjudication published: No comments received.

Date published: May 8, 2018