MEMORANDUM FOR CHIEF FINANCIAL OFFICERS
CHIEF INFORMATION OFFICERS
CHIEF ACQUISITION OFFICERS

FROM: BARBARA L. SHELTON
       ACTING COMMISSIONER
       FEDERAL ACQUISITION SERVICE

SUBJECT: Acquisitions of Products and Services for Implementation of HSPD-12

Homeland Security Presidential Directive-12 (HSPD-12), "Policy for a Common Identification Standard for Federal Employees and Contractors" requires agencies to use only information technology products and services that meet this standard. The Office of Management and Budget (OMB) has designated the General Services Administration (GSA) as the Executive Agent for government-wide acquisitions in a July 5, 2005, letter from Joshua Bolton. This memorandum specifies the procedures for ordering goods and services in compliance with the directive.

Background

HSPD-12 establishes the requirement for a mandatory Governmentwide standard for secure and reliable forms of identification issued by the Federal Government to its employees and contractors. OMB has directed Federal agencies to purchase only products and services that are compliant with the Federal policy, standards and numerous supporting technical specifications, including:

- Federal Information Processing Standard 201, *Personal Identity Verification of Federal Employees and Contractors*;
- National Institute of Standards and Technology (NIST) Special Publications (SP) 800-73, *Interfaces for Personal Identity Verification*, 800-78 *Cryptographic Algorithms and Key Sizes for Personal Identity Verification*, and 800-79, *Guidelines for the Certification and Accreditation of PIV Card Issuing Organizations*; and
To ensure standard compliant products and services are available, NIST will issue test suites in SP 800-85 - PIV Middleware and PIV Card Application Conformance Test Guidelines (SP800-73 Compliance), and will publish National Voluntary Laboratory Accreditation Program (NVLAP) accredited validation services for demonstrating conformance for products. Providers of products and services that are determined to conform to the standard will be eligible to offer approved products and services on a new GSA procurement vehicle established to align all agency acquisitions with policy.

The Smart Access Common ID Governmentwide Acquisition Contract (GWAC) has been the primary acquisition vehicle for smart cards, smart card readers, associated card management systems, related products and services. This GWAC currently requires smart card products and services to conform to the Government Smart Card Interoperability Specification (GSC-IS), as updated (i.e., GSC-IS v.2.1). While the full set of FIPS 201 requirements are in the process of being added to this GWAC, it will be allowed to expire on May 17, 2006, without the exercise of options. Only those established task orders that adhere to the guidance below will be allowed to continue beyond the expiration date.

GSA will replace GWAC with a Blanket Purchase Agreement (BPA) for smart card systems and related products and services under a recently established Special Item Number (SIN) 132-60 within IT Schedule 70. This BPA will be in place before the expiration of GWAC and will serve as the replacement vehicle for acquisition of approved, FIPS 201 compliant products and services for Federal agencies.

**Guidance for Procurements**

Federal agencies are required to purchase only approved products and services. GSA will make Federally approved products and services available that are compliant with FIPS 201 and associated specifications to agencies.

1. Agencies that have not begun deployment of smart (i.e., integrated circuit) cards as identity badges for employees and contractors should not begin or make procurements until *End Point* products, as defined in NIST Special Publication 800-73, are available. *End Point* products employ a unified card edge interface that is technology-independent and compliant with current international standards. Full technical specifications for these products can be found in SP 800-73.
2. Agencies that have initiated a large scale deployment of smart cards as identity badges prior to July 2005 may acquire Transitional products and services, also defined in NIST Special Publication 800-73, as part of a migration strategy. In so doing, these agencies should weigh benefits and costs of such a strategy over moving directly to an End Point smart card.

3. All new GWAC Task Orders (T.O.) on the existing GWAC will be reviewed and approved by the GSA, Office of Governmentwide Policy (OGP) to determine and ensure that each includes language that ensures compliance with FIPS 201. In addition, GSA will review each T.O. document to ensure it has a clear migration path; this information should also be reflected in an update to the requesting agency’s implementation plan.

4. All current GWAC T.O.s will be reviewed by GSA. The Office of Governmentwide Policy (OGP) designated a Deputy Associate Administrator to ensure these T.O.s are compliant or can be modified to ensure compliance with FIPS 201. If not, the T.O. will be allowed to expire without renewal. GSA requires that all T.O.s in effect beyond December 31, 2005 be modified by March 2006 to include language that ensures compliance with FIPS 201 and is in accordance with Federal Acquisition Regulation.

Effective the date of this memorandum, GSA procedures will ensure Federal policy and standards are met whenever acquisitions through the Smartcard GWAC or replacement BPA are used. As the designated authority for FIPS 201 compliant procurements, GSA will report to OMB on agency acquisitions pertaining to the standard. All FIPS 201 related acquisitions are subject to OMB review.

GSA will release additional information on the time-frame for BPA availability on the following website: http://www.smart.gov/. Please direct acquisition questions to Michael R. Brooks, Director, Center for Smart Card Solutions, Federal Acquisition Service, phone 202 501-2765, Fax 202 208-3133, or e-mail mike.brooks@gsa.gov.