

# IGs 7.18, 7.19 and the Draft IG 7.20

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# The Entropy IGs

- The relevant FIPS 140-2 IGs:
  - 7.14, 7.18, 7.19 and 7.20 (to be published soon)
- The FIPS 140-3 versions – later in the presentation
- IG 7.14 shows when entropy estimation is required
- IG 7.18 governs the transition
- IG 7.19 provides some useful tools for meeting the SP 800-90B requirements
- IG 7.20 anticipates the publication of SP 800-90C and provides the vendor with certain options to use before SP 800-90C becomes available
- A word about IG 7.15

# Very Important

**These IGs do not introduce any new requirements. The **shall** statements found in these IGs are the interpretations of the **shall** statements in SP 800-90B.**

**Some SP 800-90B requirements (and the future SP 800-90C requirements) have been made less strict by the IGs**

# When Do Entropy Estimation Requirements Apply?

- When the module is either generating the entropy itself or making a call to request the entropy from a well-defined source
  - A hardware module with an entropy source inside the module's cryptographic boundary
  - A software module making a call to a source within the module's physical boundary
- It is slightly more complicated when a hybrid approach is used but the idea is the same. The entropy testing requirement only applies to the actively generated / received entropy.
- This is IG 7.14. SP 800-90C will show some additional cases.

# When Do Entropy Estimation Requirements NOT Apply?

- When the entropy is obtained passively and/or there is no control over the amount of passed entropy
  - An entropy input is generated outside the module's physical boundary (by another module or the manufacturer)
  - A software module that receives an unsolicited Load command (even if from an entropy source located inside the module's physical boundary)
- An appropriate caveat shall appear in the module's validation certificate

# IG 7.18 – Transitioning to SP 800-90B

- If a Test Report is submitted today and IG 7.14 indicates that entropy estimation shall be performed, then the entropy source shall comply with SP 800-90B.
- Vendors shall provide the testing laboratory with access to raw data
- The CST lab shall submit an Entropy Test report demonstrating the source's compliance with SP 800-90B
- NIST has made a statistical testing tool available

# IG 7.18 – Continued

- The approved algorithms used in the vetted conditioning components shall be tested by the CAVP. The self-tests for these algorithms are optional if the algorithm's implementation is not otherwise used by the module.
- The stationary behavior of the noise source (section 3.2.2 of SP 800-90B) does not have to be demonstrated
- Special attention to an IID claim. The heuristic proofs of both the independence and the identical distribution are required
- IG 7.15 does not apply but some of its suggestions can be useful when performing a heuristic analysis of entropy

# IG 7.19 - Interpretation of SP 800-90B Requirements

- 18 resolutions and 5 Additional Comments – all to make designing, testing and validating entropy sources easier
- A Conditioning Chain is introduced
- Simplified testing requirements for the bijective conditioning components – no statistical testing for such non-vetted conditioning components
- The permission for the conditioning component to retain the state between invocations

# IG 7.19 - Continued

- Multiple ring oscillators may be treated as copies even if their design and parameters may vary
- A reminder that the health tests shall be tailored to detect the likely failures of a specific noise source
- The suggestions for how to use the simulation to meet the Section 4.5 of SP 800-90B requirements for the developer-defined health tests
- A requirement to perform the verification of the correct implementation of each conditioning component

# IG 7.20 - Combining Entropy from Multiple Sources

Question:

Why bother until SP 800-90C is published?

# IG 7.20 - Continued

Answer:

- A confusion among the vendors and the testing labs about combining any sources, given that SP 800-90B does not allow adding the entropies obtained from the (somewhat different) noise sources
- It is clear that SP 800-90C will allow concatenating entropy bitstrings from multiple independent entropy sources
- The need to specify in the validation certificate if only physical sources are used. The ENT(P) and ENT(NP) notation.

# More on IG 7.20

## The Limitations:

- An external conditioning will be allowed in SP 800-90C. Not in IG 7.20.
- The only way the multiple entropy sources may be combined is by concatenating their output bitstrings
- If an independence of the entropy sources is not established, then only one entropy source can be credited

# Questions?

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