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		LAP: Cryptographic and Security Testing

SUBJECT: Addition of New Requirements to NIST Handbook 150-17, Annex B, Regarding the Use of Extended Cost Recovery (ECR) Points as a Means of Monitoring Technical Proficiency

Purpose

The purpose of this NVLAP Lab Bulletin is to publish a revision to NIST Handbook 150-17, Annex B, subclauses B.2 and B.3, with regard to activities that could lead to suspension of accreditation for testing to the *Federal Information Processing Standards (FIPS) 140-2.* This bulletin becomes part of the NIST Handbook 150-17, *Cryptographic and Security Testing,* until such time as the next edition of the handbook is published.

Overview

NIST Handbook 150-17, Annex B, B.3.4 outlines various activities used as tools to demonstrate ongoing technical competencies of the accredited laboratories in the Cryptographic and Security Testing (CST) Laboratory Accreditation Program (LAP). Generally, the section had noted that validation reports would be viewed as ongoing proficiency tests; however, no system was in place to classify any reporting flaws. The development of the *Extended Cost Recovery (ECR) with Points* system will allow for a consistent and transparent means to take appropriate actions when concerns with the validation reports have been noted.

Background

The Cryptographic Module Validation Program (CMVP) receives a number of reports that are deficient, resulting in extended cost recovery (ECR) fees. Report deficiencies vary in severity; some are due to technicalities, such as incompleteness or missing documentation, while more serious deficiencies are due to security-related nonconformities. The ECR fees were originally created to address report issues that required extensive iterations between the CMVP team and the laboratory. In order to address the ongoing issue of repeated submissions of deficient reports, the *ECR with Points* system is being introduced.

ECR with Points System

The *ECR with Points* system is modeled after the driver's license points system, where traffic offenses are assigned points depending on the severity of the offense. ECR points accumulate over a two-year period of accreditation. If the maximum number of points is reached, a laboratory's accreditation will be suspended. Within the points system, ECRs would be assigned points based on the severity of the deficiency (see Table 1).

Points	Type of ECR
0	Excessive number of modules in one report
1	1, 2, 4 sub ECRs
3	Technicalities such as missing documentation or incomplete report
5	Nonconformities such as security-related issue or inaccurate representation of a module

Table 1. *ECR with Points* system

Points automatically expire or are removed at the end of the 2-year period. If a laboratory accumulates 12 or more points during the 2-year period, the testing associated with FIPS 140-2 will be suspended via official NVLAP notification. The terms to lift suspension will be handled on a case-by-case basis and will be outlined in the official notification.

Implementation of changes

Effective July 1, 2015, NIST Handbook 150-17, Annex B is amended by the addition of B.2.4.4 and the revision of B.3.4.3 as follows:

B.2.4.4
Extended Cost Recovery (ECR) with Points system
A system used to assign points for an identified deficiency(ies) in a test report submitted for validation. Points accumulate over a defined period and are assigned based on the type of ECR:

Points	Type of ECR
0	Excessive number of modules in one report
1	1, 2, 4 sub ECRs
3	Technicalities such as missing documentation or incomplete report
5	Nonconformities such as security-related issue or inaccurate representation of a module

B.3.4.3   Additional proficiency testing requirements for the 17CMH and17CMS testing

The laboratory shall maintain an ECR point total of less than 12 points during a defined 2-year period of accreditation. If a laboratory accumulates 12 or more points during the 2-year period, the accreditation for FIPS 140-2 testing will be suspended.

Please retain this NVLAP Lab Bulletin with your copy of NIST Handbook 150-17 for future reference. The point system will be piloted from July 1, 2015 to September 30, 2015, to allow all parties to gain familiarity with the point system process. The Validation Program will levy points during this period and communicate any assigned points directly to the laboratory at the time they have been levied against a report.

On October 1, 2015, all laboratory point totals will be cleared and the permanent system will be enforced per the requirements of NIST Handbook 150-17, B.3.4.3.

NVLAP will receive a monthly report from the Validation Program detailing any points assigned during the period. Any necessary accreditation actions regarding a laboratory's cumulative points will be taken by NVLAP.

Questions regarding the changes to the NVLAP CST LAP requirements should be directed to Dana Leaman, dana.leaman@nist.gov, 301-975-4679.