



**The Federal Bridge CA Certificate Policy Change Proposal Number: 2022-02**

**To:** Federal PKI Policy Authority (FPKIPA)  
**From:** PKI Certificate Policy Working Group (CPWG)  
**Subject:** Proposed modification to the Federal Bridge CA Certificate Policy  
**Date:** April 21, 2021

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**Title:** PIV-I Topography Requirements in the Federal Bridge CA Certificate Policy

**Version and Date of Certificate Policy requested to be changed:** X.509 Certificate Policy for the Federal Bridge Certification Authority (FBCA), Version 2.35, April 15, 2019. Recommended changes have also been presented for inclusion in the current FBCA Policy Draft, Version 3.X which is currently under review.

**Change Advocate’s Contact Information:**

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**Organization requesting change:** Department of Health & Human Services (HHS)

**Change summary:**

This change will allow Federally issued PIV-I credentials to leverage the same cardstock used for PIV issuance. This necessarily includes “pre-printed,” agency seals that are contained within Zone 11F as defined by FIPS 201.

This proposed change does not modify existing limitations on Zone 11F for non-Federal PIV-I providers.

**Background:**

HHS has been issuing a Restricted Local Access (RLA) credentials to facilitate limited physical and logical access to HHS facilities and systems. Due to FPKI compliance concerns, the Department plans to migrate the RLA to a Federally issued PIV-I credential moving forward.

Given limitations associated with acquisitions, all HHS PIV/PIV-I/RLA cardstock come pre-printed with the HHS Department seal in Zone 11F. This use of an agency seal in this zone is currently disallowed for all PIV-I topography.

In order to ensure HHS RLA and PIV-I credentials are discernable from PIV credentials, a sample layout is shown in Appendix A of this change proposal.

At the time PIV-I was defined in the FBCA CP, it was envisioned that PIV-I would only be issued by and to non-government entities. Therefore, it was important to ensure a PIV-I could not be visually mistaken for a government issued PIV card. This was specified with the very generic “Visual distinction of a PIV-I Card from that of a Federal PIV Card is required to ensure no suggestion of attempting to create a fraudulent Federal PIV Card.” The minimum specific visual difference of “images or logos on a PIV-I Card shall not be placed entirely within Zone 11, Agency Seal, as defined by [FIPS 201].” Was because there was no thought that these cards would be issued on behalf of a Federal Agency.

The PIV-I for Issuers guide was revised in 2017 to recognize the possibility of federal issuers of PIV-I, as agencies saw the value in issuing PIV-I credentials to people who do not meet the requirements for PIV, but have a need for strong authentication to agency resources, either physical or logical, or both.

Some agencies, for example HHS, may purchase card stock that they would like to use for either PIV or their federally issued PIV-I, that comes with the agency seal pre-printed on the surface of the card. Therefore, they are proposing to relax the one specific visual difference in the PIV-I definition of federally issued PIV-I as long as they retain other visual distinction.

### **Specific Changes:**

Insertions are underlined; deletions are in ~~strikethrough~~.

### APPENDIX A – PIV-INTEROPERABLE SMART CARD DEFINITION

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The following requirements shall apply to PIV-I Cards:

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8. Visual distinction of a PIV-I Card from that of a Federal PIV Card is required to ensure no suggestion of attempting to create a fraudulent Federal PIV Card. Examples of allowable visual distinction includes (but are not limited to):

- Printing a phrase such as PIV-Interoperable, [Company credential], [Organization] Local Access Only, or some other phrase that makes it clear this is not a PIV on the front of the card
- Printing the card horizontal rather than in portrait mode,
- Using a colored background

For non-Federally issued PIV-I, At a minimum, images or logos on a PIV-I Card shall not be placed entirely within Zone 11F, Agency Seal, as defined by [FIPS 201].

### **Delta Mapping:**

It is unlikely there are specific requirements in a mapped CP/CPS that would need to change.

**Estimated Cost:**

There is no cost expected to implement this change. Due to acquisition specifics this change may prevent the need for Federal PIV-I issuers additional costs associated with procuring additional “blank” cardstock.

**Implementation Date:**

This change will be effective immediately upon approval by the FPKIPA and incorporated into the Federal Bridge CA Certificate Policy.

**Prerequisites for Adoption:**

There are no prerequisites.

**Plan to Meet Prerequisites:**

Not Applicable.

**Approval and Coordination Dates:**

Date presented to CPWG: February 22, 2022 and March 22, 2022

Date change released for comment: February 10,2022

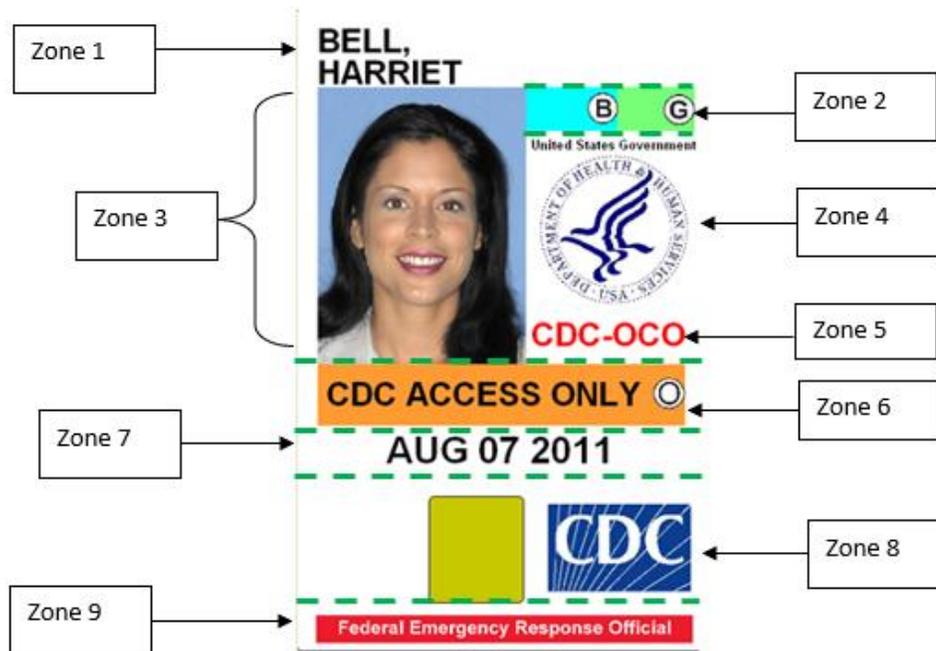
Date comment adjudication published: March 16, 2022

## Appendix A – HHS issued Restricted Local Access (RLA) Badge Differentiators

HHS RLA (and PIV-I) has the follow key visual differentiations when compared to PIV:

- 1) Orange stripe placement with the designation the card is restricted to local access at the issuing agency
- 2) The cardholder's name placement is moved above portrait photo
- 3) United States Government designation is moved above agency seal
- 4) Large expiration date below Orange stripe
- 5) Blue/Green "Color Coding" for foreign national and contractor color designation moved above seal
- 6) Addition of the issuing agency (OpDiv) logo right of chip

Figure 1: RLA From: Visual Car Topography



*Zone 1: Name* - The full name shall be printed directly above the photograph in capital letters. The font shall be Arial 12 point bold. The maximum number of characters per line is approximately 13. If the name exceeds the space available, then the name shall be truncated to fit the first 13 letters, or where applicable, as many letters as possible. This will be printed at personalization.

*Zone 2: Color Coding*- The use of the blue indicator for foreign nationals is highly recommended; OpDivs choosing not to use the blue indicator must maintain documentation for OSSI review with supporting rationale that includes how foreign nationals are prevented from accessing facilities to which they are not authorized access. Use of the green indicator for contractors is mandatory. The blue and green indicators are independent.

*Zone 3: Photograph* – The photograph shall be placed on the left-hand side directly across from the HHS seal. The photograph will be a full-frontal pose from top of the head to shoulders. A minimum of 300 dots per inch (dpi) resolution shall be used. The background will follow recommendations set forth in [SP 800-76](#). The recommended dimensions are 37.00mm x 27.75mm (.75 aspect ratio).

*Zone 4(Zone 11F): HHS Seal* – The HHS seal shall be placed on the right-hand side directly across from the photograph. The seal will be pre-printed on the HHS cardstock. The text “United States Government” shall be placed above the HHS Seal. The font shall be Arial 5 point.

*Zone 5: OpDiv Affiliation Type* – The OpDiv name and affiliation shall be placed directly under the HHS Seal on the right-hand side. The font will be Arial 14 point and in red. The affiliation types will be generated from the PIV classifications currently in the SCMS.

*Zone 6: Orange Stripe* – All RLA credentials will be issued with an orange stripe that contains the *OpDiv abbreviation followed by “Access Only.”*

*Zone 7: Expiration Date* – The card expiration date shall be printed in MMM DD YYYY format below the cardholder association type. The font shall be Arial 16 point bold.

*Zone 8: OpDiv logo* – The issuing OpDivs logo shall be printed on the right of the chip. All logos will be printed in the OpDiv-approved color(s). The following table contains low-resolution examples of the OpDiv logos. High-resolution digital files of these logo will be obtained and provided to the printed services.

*Zone 9 (Zone 12F): Federal Emergency Responder Footer* – OpDivs have the option of printing a red band with “Federal Emergency Responder” in the footer for those Cardholders who hold this designation.