	DEPARTMENT OF COMMERCE National Institute of Standards and Technology National Voluntary Laboratory Accreditation Program	**ISSUE DATE:** January 2, 2018
NVLAP®	**LAB BULLETIN**	**NUMBER:** LB- 107-2018
		LAP: Common Criteria Testing

SUBJECT: Supplement to NIST HB 150-20:2014, section 3.3.3 regarding frequency of commercial evaluation and the new section 3.3.4 regarding the use of the common criteria testing lab (CCTL) point system as a means of monitoring technical proficiency.

Purpose

The purpose of this NVLAP bulletin is to publish a supplement to NIST HB 150-20:2014, section 3.3.3 regarding the frequency of the commercial evaluation requirements as well as the addition of section 3.3.4 which defines a point system for activities that could lead to suspension of accreditation for testing to the Common Criteria (CC). This bulletin becomes part of the NIST Handbook 150-20:2014, Common Criteria Testing, until such time as the next edition of the handbook is published.

Overview

NIST Handbook 150-20:2014, section 3.3.3 will now state that labs are required to demonstrate continued proficiency to perform Common Criteria evaluations by successfully completing a commercial evaluation annually under the oversight of NIAP. Section 3.3.3 previously required a commercial evaluation on a two-year cycle.

Section 3.3.3 also states that upon completion or termination of each NIAP evaluation, NIAP will report to NVLAP the results of the evaluation. NIAP accomplishes this by completing a Proficiency Feedback (PF) report.

The CCTL point system defined in section 3.3.4, provides a consistent and transparent means to classify nonconformities and monitor CCTL technical proficiency.

Background

When NIAP finds nonconformities in evaluation evidence received from a Common Criteria testing laboratory (CCTL), it results in evaluation completion delays, terminations, and unforeseen costs to NIAP and industry. Nonconformities vary in severity; some are due to technicalities, such as incompleteness or missing documentation, while more serious issues are due to security-related product nonconformities. The PF report was originally created to address reports that required extensive iterations between the validation team and the laboratory. Today, the PF report contains proficiency feedback on a lab's performance during each phase of the

evaluation process. To objectively monitor CCTL technical proficiency, the CCTL point system is being introduced.

CCTL Point System

The CCTL point system is modeled after the driver's license point system, where traffic offenses are assigned points relative to the severity of the offense. CCTL points accumulate over a two-year period of accreditation. If the maximum number of points is reached, a laboratory's accreditation will be suspended. Evaluation report issues will be assigned points based on the severity of the deficiency (see Table 1).

Points	Evaluation Report Issues (deficiency)
1	program management, such as failure to maintain a current project schedule
3	technicality, such as missing documentation, incomplete report, or failure to meet schedule
5	nonconformity, such as a security-related issue, or inaccurate representation of a product

Table 1. *CCTL Point System*

Points automatically expire or are removed at the end of the two-year accreditation period. A laboratory accumulating 12 or more points during the two-year period will have the testing associated with NIAP 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 January 1, 2018, NIST Handbook 150-20:2014 is amended by the revision of section 3.3.3 and the addition of section 3.3.4:

3.3.3
Demonstration of continued proficiency
NIAP CCEVS requires that the laboratory demonstrate its continued proficiency to perform Common Criteria evaluations by successfully completing a commercial evaluation annually under the oversight of the NIAP validation scheme. Upon completion or termination of each NIAP evaluation, NIAP will report to NVLAP the results of the evaluation. The continuing demonstration of successful completion of NIAP evaluations will serve to meet the NVLAP proficiency testing requirement.

3.3.4
CCTL Point System
A system used to assign points for evaluation report issues identified in the performance of an evaluation activity. Points accumulate over a defined period and are assigned based on the type of deficiency:

Points	Evaluation Report Issues (deficiency)
1	program management, such as failure to maintain a current project schedule
3	technicality, such as missing documentation, incomplete report, or failure to meet schedule
5	nonconformity, such as a security-related issue, or inaccurate representation of a product

The laboratory shall maintain a point total of less than 12 points during a defined two-year period of accreditation. If a laboratory accumulates 12 or more points during the two-year period, the accreditation for Information Technology Security Testing - Common Criteria will be suspended.

_____

Please retain this NVLAP lab bulletin with your copy of NIST Handbook 150-20:2014 for future reference.

The point system will be piloted from January 1, 2018, to June 30, 2018, to allow all parties to gain familiarity with the point system process. NIAP will levy points during this period and communicate any assigned points directly to the laboratory at the time they are levied.

On July 1, 2018, all laboratory point totals will be cleared and the permanent system will be enforced per the requirements of NIST Handbook 150-20:2014 section3.3.4.

NVLAP will receive a monthly report from NIAP detailing all 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 Common Criteria LAP requirements should be directed to Brad Moore, brad.moore@nist.gov, 301-975-5740.