

Frequently Asked Questions for NIAP Policies #21 and #22:

1. *What has NIAP changed in Assurance Maintenance (AM) with these policies?*

Based on years of experience with assurance maintenance, many product vendors do not submit their evaluated products for AM in a timely manner for updates made to their products. This has left end users uncertain about whether to install vendor-delivered patches and remove the product from its evaluated configuration; or to ignore the patches and have the product used in the original, evaluated configuration. Policies #21 and #22 serve to encourage end users to install vendor-delivered patches to ensure the latest security bug fixes are incorporated into operational products, while still maintaining system accreditation on the evaluated product. The policies will also serve to keep the Product Compliant List (PCL) more current by providing a clearly defined deadline to allow archiving of evaluated products that are not maintained.

2. *What impact do these policies have on Mutual Recognition?*

These policies will follow Common Criteria-defined Assurance Continuity processes. The only difference is the newly established timeframe for when an Impact Analysis Report must be submitted for the product to remain on the PCL (as indicated by the product's AM date on the PCL). The updated policies also allow for patches to be installed in the evaluated product; and mandate review of all product changes through an Impact Analysis report submitted no later than 30 days prior to the Assurance Maintenance Date.

3. *Can products be submitted more than once for AM prior to their AM date?*

Yes – Impact Analysis Report(s) may be submitted as determined by the vendor up to 30 days prior to the AM date.

4. *Will products listed on the PCL but evaluated in other CC Schemes have to follow these policies?*

Yes. Each product listed on the NIAP PCL/VPL will have an associated AM date. Vendors with products evaluated in other schemes may perform their maintenance in the original evaluating scheme. The vendor or scheme should notify NIAP upon successful completion of the AM activity so the PCL entry can be updated.

5. *If my product is on the VPL (i.e., awarded an EAL-based certificate) and I submit an IAR 30 days before the Assurance Maintenance Date, will I get a 24-month extension on the VPL?*

No, NIAP is not changing the Assurance Maintenance Date for any products with EAL-based compliant claims, which are all products listed on the VPL. As of the date of the Policy #21 (30 April 2014), NIAP is no longer extending the life of the product on the VPL for EAL evaluations. Please be aware that we are transitioning away from EAL and focusing solely on NIAP-approved PP compliant evaluations. A product will need to be re-evaluated against a NIAP-approved PP in

order to stay on the Product Compliant List. Otherwise, the product will move to the [Archived Products List](#) effective on the Assurance Maintenance Date.

6. Will a product remain on the VPL during re-evaluation against a NIAP-approved PP?

No, the old VID will be moved to the Archived Products List. If a new evaluation is initiated by the vendor, the product will be given a new VID number and upon successful Check-in, will be placed on the "[In-Evaluation List](#)" on the NIAP website.

7. How long does a 'maintained' TOE stay on the PCL? Does it just reset to another 24 months?

Upon successful completion of re-evaluation or Assurance Maintenance on a product claiming compliance to a NIAP-approved PP, the Assurance Maintenance Date will be updated to 24 months from completion.

Note: In the future, for products with a faster revision cycle such as mobility, the Assurance Maintenance date may be reduced.

8. What is the dividing line between bug fixes and enhancements? Sometimes bugs are fixed by adding minor functionality.

[CCEVS Publication #6](#), "Assurance Continuity: Guidance for Maintenance and Re-evaluation," outlines the differences between major and minor changes.

9. What if the product doesn't change in 24 months?

An Impact Analysis Report is still required, according to [CCEVS Publication #6](#), "Assurance Continuity: Guidance for Maintenance and Re-evaluation."

10. Will products archived on the VPL also be archived on the Common Criteria Portal?

Yes, they will also be archived on both the NIAP VPL and the CC Portal.