

DOI Comments and Questions

1. Section 1: “Within the Department of Defense (DOD), the Directive applies to members of the Armed Forces and DOD civilian employees (including both appropriated fund and nonappropriated fund employees). This directive does **not** apply to retirees, family members, and non-military eligible beneficiaries.”

Question: The United States Department of the Interior (“DOI”) would like to know if the retiree clause can be expanded to include all agencies.

2. Section 1: “Directive does **not** apply to short-term guests and occasional visitors to Federal facilities to whom you would issue temporary identification.”

Question: Does OMB consider volunteers to be in this category? DOI has a substantial number of volunteers every year.

3. C. Federally Controlled Facilities

“Federally-owned buildings or leased space, whether for single or multi-tenant occupancy, and its grounds and approaches, all or any portion of which is under the jurisdiction, custody or control of a department or agency covered by this Directive.”

Question: Whose responsibility is it to provide systems for this building? For example, if it is GSA owned facility that DOI leases a floor from, shouldn't the cost of installing this overall security system be GSA's responsibility with the cost to be paid and amortized by DOI over the cost of the lease. This provides economies of scale and provides a uniform system as opposed to each agency in the lease space doing its own installs.

4. Question: If conformance testing is not available until 8/5/05, how can GSA establish authentication acquisition services by 7/31/05? How can “Suppliers of the technology used to implement this directive”...be... “compliant with the Standard” and...”demonstrate the established criteria are met” if the conformance testing is delivered after acquisition services are finalized.
5. Just to clarify Section 7.C, 800-73 is now finalized.
6. Implementation Plan Template Part III, Question 2 - NAC complete before card issuance - **need to work with FBI to speed up the process of the FBI name check which can currently add several weeks to the completion of the NAC.**
7. Implementation Plan Template Part III, Question 3 - should state that the agency has 6 months to complete the inquires portion of the NACI, after the NAC is complete and the credential is issued.
8. Implementation Plan Template Part III, Question 7 - no question 7
9. Implementation Plan Template Part III, Question 12- There is some confusion as to how the FAR relates to this question. Is OMB asking an agency if it has followed proper procurement procedures?