

## RMF ATO – (A&A) and EAL Certifications

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### Scenario:

A government contractor wants to certify a Crypto module with concurrent certifications; Government ATO - A&A, and EAL 7. How would you accomplish these goals within roughly the same time frame?

### Analysis:

Since both the EAL 7 certification and the ATO or “Authorization to Operate” (NIST, 2010) A&A “Assessment and Authorization” (U.S. Department of the Interior, n.d.), require similar proof/evidence regarding the security and soundness of the entire SDLC, performing both certifications concurrently will likely save time in the long run, although I would recommend finishing the EAL 7 certification first (NIST, 2010; Ouyang, n.d.). To that point, many of the formal design requirements of EAL 7 can be included in the Security plan portion of the ATO assessment (NIST, 2010; Ouyang, n.d.). Moreover, since the formal testing and verification requirements of EAL 7 require that there be no errors in the product/TOE, achieving an EAL 7 rating and including said EAL 7 rating in the “Security assessment report” (NIST, 2010) portion of the ATO assessment will fulfill many of the requirements of that document (NIST, 2010; Ouyang, n.d.). Moreover, the POA&M or “plan of action and milestones” (NIST, 2010) section of the ATO assessment will be limited as the system will be proven to be error-free by achieving an EAL 7 rating before ATO A&A (NIST, 2010; Ouyang, n.d.; UMGC, 2022). Lastly, an EAL 7-rated crypto module will necessarily meet the ATO standards, as the “Federal Information Processing Standard (FIPS) 140-2” (Evans et al., 2001) highest security standard is “Level 4” (Evans et al., 2001) which only requires “CC evaluation assurance level EAL4” (Evans et al., 2001).

References:

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