National Information Assurance Partnership
Common Criteria Evaluation and Validation Scheme

NIAP Policy Letter #32

1 February 2025

SUBJECT: NIAP Cloud SaaS Evaluations

REFERENCES:

Committee on National Security Systems Policy #11

Common Criteria Evaluation and Validation Scheme Publication, “Check-In/Check-Out Guidance”

National Information Assurance Partnership National Information Assurance Partnership Policy Letter #17, "Effects of Vulnerabilities in Evaluated Products"

National Information Assurance Partnership National Information Assurance Partnership Policy Letter #31, "Remote Testing"

Common Criteria Evaluation and Validation Scheme Publication #4, “Guidance to NIAP-Approved

Common Criteria Testing Laboratories”

PURPOSE: This policy defines additional guidance for cloud-based Software as a Service (SaaS) NIAP Common Criteria evaluations.

BACKGROUND: Pursuant to the Committee for National Security Systems Policy (CNSSP) No. 11, NSA’s participation through NIAP is to approve evaluation processes for all Commercial-off-the-shelf cybersecurity information technology (IT) products used on or to protect national security systems. Cloud evaluations present many challenges to traditional evaluations against Protection Profile (PP) using exact conformance.

POLICY: All cloud-based evaluations submitted to NIAP claiming conformance against PPs that are capable of being used with applications in the cloud must adhere to the following requirements:

- Assurance and Evaluation Activities: in cases where assurance and evaluation activities are impossible or impractical to perform, the Common Criteria Testing Laboratory (CCTL) must submit a

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Technical Query (TQ) including a justification as to why an assurance activity cannot be performed and a proposed alternative approach;

- Suitability Review:
  - the CCTL must submit a list of security functional requirements (SFRs) and security assurance requirements (SARs) that are likely to require TQs (as per Assurance and Evaluation Activities above) to NIAP for a suitability review as part of the check-in package;
  - resolution of some TQs may be required to complete the suitability review and proceed to kick-off;
- Remote Testing: prior to kick-off, the CCTL must submit to NIAP a remote testing request adhering to NIAP Policy Letter 31;
- Mutual Authentication: the Target of Evaluation (TOE) must implement mutual authentication when using secure communication protocols;
- Federal Risk and Authorization Management Program (FedRAMP):
  - the TOE and the utilized Cloud Service Provider's environment (Cloud Service Offering) must have FedRAMP Authorization, the documentation for the TOE's FedRAMP authorization must be provided as part of the check-in package;
  - additional documents may be required during the evaluation;
- Platform Functionality: if the TOE relies on the platform to implement any functionality, the platform must be on the NIAP Product Compliant List;
- Evaluated Configuration:
  - Due to the nature of continuous updates, the version of the TOE claimed must have all SFRs tested within a 60 day window, which must be within 90 days of a submission of a complete check-out package to minimize changes to the version of the evaluated configuration;
  - The TOE and its components (including 3rd party components) must be clearly identified with version and build number;

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- All changes between versions during testing and any interactions with IT environmental components must be documented;

- Public Vulnerability Search: a public cloud vulnerability & security issue database (e.g., cloudvulndb.org) must be included in the public domain sources as part of AVA_VAN.1.2E.

Any request for a deviation from any part of this policy must be submitted to the NIAP Director in writing as early as possible in the evaluation and will be resolved on a case-by-case basis.

EFFECTIVE DATE: February 5, 2025

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