## PIV IN EPACS IMPLEMENTATION CHALLENGES

Colin Doniger
DHS HQ
Office of the Chief Security Officer
Physical Security Branch Chief

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## Implementing PIV in EPACS

- Policy Gaps
  - Where is the authority?
    - PIV in EPACS No authority reference
    - M11-11 who even knows it exists
      - Refs 800-116 (technically a recommendation)
    - Is FICAM authoritative in PHYSEC world?
    - Where does ISC come into play?
      - Does not Translate
    - Unrestricted, Controlled, Limited, Exclusion
      - Not realistic or practical, but in all FICAM docs
      - It doesn't align with ISC
- New EPACS = Easy (just follow APL and enroll)
- Existing EPACS (thousand of cardholders) = not easy (enrollment nightmare)
- IDMS, CRLS, and PACS internet access
  - How do I integrate with my IDMS and get CRL info for fed partners?
  - How do I cache certs and still deactivate cards instantly?
  - FISMA?
- What number do we use
- Future proofing
  - Past bought readers now useless
  - Future what shortcomings will we be hit with (obvious read time)