CENTER FOR VETERINARY BIOLOGICS NOTICE 18-07

TO: Biologics Licensees, Permittees, and Applicants
    Directors, Center for Veterinary Biologics
    Veterinary Services Leadership Team

FROM: Byron Rippke
      Director

SUBJECT: Digital Signatures on Microsoft Word Documents

I. PURPOSE

This Notice informs licensees, permittees, and applicants of a situation with Microsoft Word documents previously signed by CVB employees, which causes the digital signature to appear eventually with a “Revoked Certificate” message even though a valid signature was applied at the time of signing.

II. BACKGROUND

The Center for Veterinary Biologics recently began accepting, via the NCAH Portal, Outlines of Production and labels in Microsoft Word format (.docx). CVB employees digitally sign these documents when they are approved. The CVB utilizes an advanced electronic signature based on XAdES, which has the following features:

- uniquely linked to, and capable of identifying, the signatory;
- only the signatory has control of the data used for the signature creation;
- can be identified if data attached to the signature have been changed after signing.

Signatures applied prior to approximately May 2, 2018, are compliant with the XAdES-EPES (Basic) standard, which is insufficient to ensure long-term validity of the signature. Signatures applied since approximately May 2, 2018, are compliant with the XAdES-X-L standard, which was intended to provide long-term certificate validation. Unfortunately, issues remain because of how the signing credentials of CVB employees are handled upon renewal or when an employee separates from Federal service. The certificates are “revoked”, which causes MS Word to display a “Revoked Certificate” message above the signature, even though the signature was valid at the time of signing. The signing certificates of most CVB employees have expired or will be expiring over the next several months, which will cause the revoked certificate message to appear on all digitally signed MS Word documents after the signing certificate used to apply the signature is replaced.

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After the signing certificate used to apply the signature is revoked, document signatures have this appearance:

Note that the signature date no longer displays next to the signature.

III. ACTION

The CVB continues to look into this issue and is working toward a solution.

Readers can look at “Signature Details” to verify the original signature date and determine that the signature was applied while the certificate was valid. Stepwise instructions to drill into Signature Details are available at https://support.office.com/en-us/article/view-digital-signature-and-certificate-details-76ba00cb-1e58-42aa-8717-0caee76bb3cf.

This traceability will be sufficient for regulatory purposes with APHIS; no further remedial action is needed. If additional assurances of validity are required for specific documentation used for international registration, contact your CVB reviewer to discuss.
necessary actions on a case-by-case basis. For any other questions regarding digital signatures, contact CVB.PIMS@aphis.usda.gov

IV. IMPLEMENTATION/ APPLICABILITY

This action is effective immediately and applies to all electronically submitted Outlines and labels (.docx format). Adobe Acrobat documents (.pdf) are not affected.