



Animal and Plant  
Health Inspection  
Service

Veterinary Services

Center for Veterinary  
Biologics

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## **CENTER FOR VETERINARY BIOLOGICS NOTICE 18-11**

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

**FROM:** Bryon Rippke  
Director

**SUBJECT:** Policy for Long-Term Recognition of CVB Digital Signatures in  
Microsoft Word documents.

### **I. PURPOSE**

This Notice informs licensees, permittees, and applicants of procedures to compensate for an inability to prevent a “Revoked Signature” message from appearing on Microsoft (MS) Word Documents previously signed by CVB employees. This message appears when documents are opened after the original signing credentials are out of date, even though a valid signature was applied at the time of signing. This Notice is a follow-up to CVB Notice 18-07.

### **II. BACKGROUND**

The CVB recently discovered issues with ensuring the long-term validity of digital signatures applied to MS Word documents, which are currently used for electronic outlines and labels. With many digital signature formats, the validity of the signature must be verified by an external Certificate Authority whenever it is opened. Once the credential used at the time of signing is inactivated or is replaced, external confirmation is no longer possible and the signature no longer is characterized as valid. The USDA “revokes” signing credentials when they reach expiration or an employee leaves Federal service. Hence, a “Revoked certificate” message eventually appears on CVB signatures, once the credential is obsolete.

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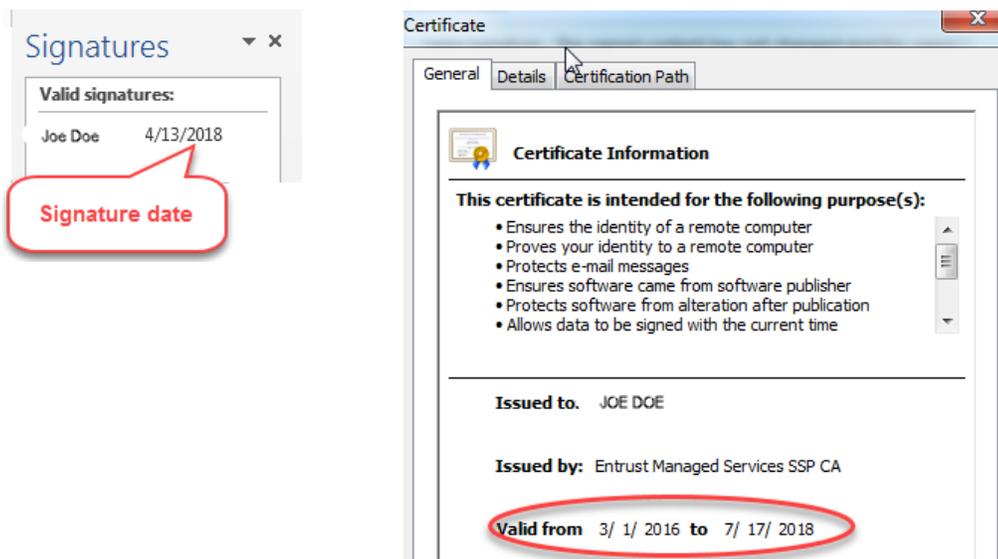


It was hoped that converting to the XAdES-X-L standard, wherein a third-party time stamp and the signatory's signing credentials are embedded in the document, would allow the signature to be validated without an external Certificate Authority check upon opening. APHIS recently held discussions with Microsoft, however, and MS Word does not currently have a mechanism to suppress the external check for revoked certificates, regardless of the signature standard used.

The CVB is taking the following action to compensate for this inability to prevent a "Revoked certificate" message from appearing on MS Word documents signed by the CVB.

### III. ACTION

As described in CVB Notice 18-07, the CVB will continue to recognize documents with a Revoked Certificate message for APHIS regulatory purposes, provided that the Signature Details confirm that the document was signed while the signing 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>.



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If an outline or label *processed by the CVB* is required for international registration purposes, two options are available:

- If the international authority will accept a “copy” of the outline or label (analogous to a photocopied paper document), create an archival PDF version of the signed document immediately upon receipt, while the CVB signature still shows as valid. Instructions for creating a PDF version while retaining a photographic image of the signature are found in **NCAH Portal User Guide 12**. This produces a copy of the document where the signature is a static photographic image, and the signature appearance will never change.
- Certain international authorities may require a “verifiable” digital signature, in which the link to the certificate server is still functional (i.e., not a photographic image of a signature). If this need arises after the CVB signature is revoked, submit a “revision” of the document for an updated signature. Indicate in the Brief Description “No content changes; updated signature requested”. The document will then be signed by a CVB reviewer having a lengthy valid period left on his/her current signing credential to provide the maximum possible use period.

#### IV. IMPLEMENTATION/ APPLICABILITY

This action is effective immediately. It applies to all submissions of electronic outlines and labels. Paper submissions are not affected.