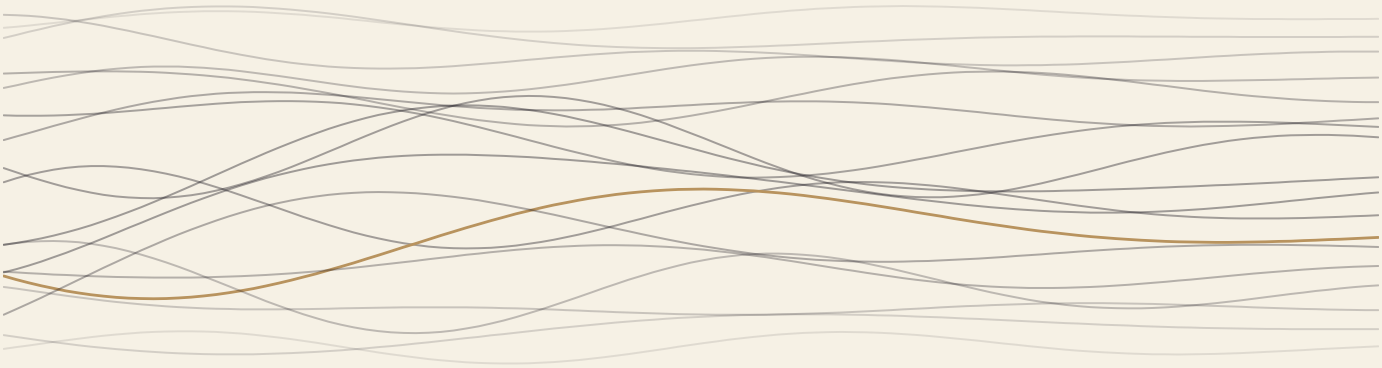
OVERT

OBSERVABLE VERIFICATION EVIDENCE FOR RUNTIME TRUST



From Claim to Verified Conformance

Maturity levels · scope designators · profile registry · IAP qualification · assessors · versioning policy

DATE	June 2026
PUBLISHED BY	GLACIS Technologies, Inc.
REPRODUCES	Part 5: Conformance (Section 22)
COMPLETE EDITION	overt.is
CONTACT	overt-review@glacis.io

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PART 5: CONFORMANCE

> ***A claim is worth what can be checked. This part fixes the levels of proof, the parties permitted to verify them, and what a conformance statement must put on the record — so that "we run OVERT" means something an outsider can test.***

22. Conformance

22.1 Overview

OVERT conformance is expressed as a composite claim combining a **maturity level** (1–4) and a **scope designator** (Core, Agentic, or Agentic-Extended). That claim describes the depth of control-execution evidence an implementation produces within its declared scope; it does not constitute a general representation that the system is secure, compliant, or safe.

OVERT conformance requires AAL-4 attestation for all controls designated as AAL-4 in this standard. Controls designated AAL-1, AAL-2, or AAL-3 require the specified level. Conformance is assessed per-control, not globally.

An AAL designation on a control specifies the assurance grade that control SHALL achieve **when the deployment architecture required by the claimed maturity level supports that grade**, per the architecture-to-maximum-AAL mapping in Section 4.1.1. At Levels 3 and 4, whose required architecture includes an independent notary, controls designated AAL-4 SHALL produce AAL-4 artifacts. At Levels 1 and 2, whose required architecture does not include an independent notary, a control designated AAL-4 SHALL be satisfied at the highest assurance level the level's required architecture supports — for example, AAL-2 operator-generated evidence for a Level 2 deployment with no independent attestation infrastructure, or AAL-3 where an operator-controlled notary is deployed. This grading does not relax the control-family requirements of the conformance matrix (Section 22.5); it determines the assurance grade at which a required control is evidenced for the claimed level. A conformance claim SHALL NOT represent that any control achieved AAL-4 unless the deployment architecture supporting the claim meets the AAL-4 requirements of Section 4.1.1.

The maturity level determines which governance domains, attestation architecture requirements, and response or preservation capabilities are in scope for verification. The scope designator determines whether the claim is limited to non-agentic operation or extends to agentic execution paths such as tool use, inter-agent coordination, delegated capability use, disclosure, drift governance, MCP trust governance, durable state governance, prompt registration, and delegated identity attestation.

Every conformance claim at any level SHALL include a human-readable scope summary identifying the systems, interfaces, and traffic classes covered, and a human-readable exclusions summary identifying what is not covered. Level 1 and Level 2 claims SHALL include the scope summary and exclusions summary. Level 3 and Level 4 claims SHALL additionally identify the mediation scope statement hash, the declared coverage percentage of the mediation scope relative to its denominator, the denominator source used for coverage and measurement claims, whether that denominator source is independently verifiable or operator-declared only, and the total exposure-window duration (periods of unattested operation) during the claim period. A Level 3 or Level 4 claim that includes optimistic enforcement SHALL also disclose the percentage of in-scope actions processed under optimistic enforcement during the claimed period, including both the claim-period average and the worst single-epoch value.

A conformant implementation SHALL state its conformance using the grammar defined in Section 22.4 and SHALL satisfy every normative requirement associated with its claimed level and scope.

22.2 Maturity Levels

OVERT defines four cumulative maturity levels. Each level subsumes all requirements of the preceding level.

Level	Name	Governance Domains (Part 2)	Attestation Architecture (Part 4)	Summary
1	Foundation	GOVERN (Section 5): GOV-1 – GOV-5; IDENTIFY (Section 6): IDE-1, IDE-2	None	Documented governance basis and system characterization. Buyers and auditors may verify that policies, inventories, and impact assessments were documented. Runtime enforcement, continuous monitoring, and incident-grade evidence are outside Level 1.

Level	Name	Governance Domains (Part 2)	Attestation Architecture (Part 4)	Summary
2	Enforcement	Level 1 + PROTECT (Section 7): PRO-1 – PRO-5; HITL (Section 15): HITL-1, HITL-4	Section 17 (Non-Egress Architecture), Section 18 (Temporal Binding)	Adds attested boundary enforcement, non-egress architecture, temporal binding, and defined human approval paths. Buyers and auditors may verify that declared execution controls operated at the runtime boundary for in-scope actions.
3	Measurement	Level 2 + ATTEST (Section 8): ATT-1 – ATT-4; MEASURE (Section 9): MEA-1 – MEA-4; HITL (Section 15): HITL-2, HITL-3	Level 2 + Section 19 (Statistical Measurement), Section 20 (Auditability)	Adds independently useful telemetry, statistical measurement, transparency-log auditability, and full human-review evidence. Auditors and defenders may verify sampling integrity, coverage disclosures, measurement outputs, and attested review events for in-scope operations.
4	Evidence-Grade	Level 3 + RESPOND (Section 10): RES-1 – RES-5; ATTEST (Section 8): ATT-5	Level 3 + Section 21 (Legal Preservation)	Adds attested response actions, IAP governance, and preservation or export controls for later investigation. This is the highest OVERT evidence and preservation tier. It does not establish overall security, regulatory compliance, insurer endorsement, or entitlement to insurance coverage.

> ***Note.*** *HITL controls (Section 15) appear in Part 3 but are required at Core scope because human oversight obligations arise for both agentic and non-agentic systems at Levels 2–4. HITL is architecturally situated in Part 3 for editorial coherence with the agentic control family, not because it is agentic-only.*

22.3 Scope Designators

The scope designator controls whether an implementation must additionally satisfy the agentic-specific control families in Part 3 (Sections 11–16, with HITL excluded from the scope gate). HITL (Section 15) is required by the maturity level regardless of scope.

Scope	Sections Required	Description
Core	Part 2 (Sections 5–10) per level + Section 15 (HITL) per level + Part 4 (Sections 17–21) per level	Systems that do not autonomously invoke external tools, coordinate with other agents, or operate under delegated authority.
Agentic	Core + TOOL (Section 11, excluding Section 11.5) + MULTI (Section 12) + CAP (Section 13) + DISC (Section 14) + DRIFT (Section 16), each per level	Systems that autonomously invoke external tools, participate in multi-agent orchestration, operate under delegated capability grants, or exhibit potential for goal drift. Does not use MCP or equivalent tool-hosting protocols for external tool invocation.
Agentic-Extended	Agentic + MCP (Section 11.5) + STATE (Section 15.6) + IDENT (Section 15.7), each per level	Agentic systems that additionally invoke tools through MCP servers (managed, custom, or external), persist durable agent state across session boundaries, register prompt artifacts, or operate under federated/delegated identity chains.

The controls required at each level are:

Level	Agentic Controls (in addition to Core)	Agentic-Extended Controls (in addition to Agentic)
1	None (policy and inventory only)	None (policy and inventory only)
2	TOOL-1 – TOOL-5, DRIFT-1, DRIFT-3.4	MCP-1 (if managed MCP), MCP-3.1 (if external MCP), STATE-2.1
3	Level 2 + MULTI-1 – MULTI-2, CAP-1 – CAP-2, DISC-1, DRIFT-2, DRIFT-3, DRIFT-5	Level 2 Extended + MCP-1 – MCP-3, STATE-1, STATE-2, IDENT-1.1 – IDENT-1.3
4	Level 3 + DRIFT-4	Level 3 Extended + IDENT-1.4, IDENT-1.5

An implementation deploying agentic capabilities SHALL claim Agentic scope. Claiming Core scope for a system that autonomously invokes external tools or coordinates with other agents is non-conformant regardless of maturity level.

An implementation deploying agentic capabilities that use MCP servers, persist durable agent state, register prompt artifacts, or operate under federated identity SHALL claim Agentic-Extended scope. Claiming Agentic scope (without the Extended qualifier) for a system that uses MCP servers or

persists durable agent state is non-conformant. Where only a subset of the Agentic-Extended control families applies, the conformance statement Exclusions field SHALL declare the omitted family and the architectural justification.

> ***Note.*** *At Level 1, the Agentic scope designator indicates only that the system deploys agentic capabilities and that the operator has satisfied the Level 1 documentation requirements. It does not indicate that agentic-specific enforcement, monitoring, or drift controls are in place.*

> ***Note.*** *At Level 3 Agentic, CAP-2.1 and CAP-2.2 are elevated to AAL-3 (machine-generated enforcement telemetry). Claims about architectural separation based on CAP-2 at Level 3 therefore reflect operator-controlled telemetry-grade evidence, not cryptographically independent proof.* ***Level 3 Agentic conformance statements SHALL explicitly state that CAP-2 evidence is AAL-3 (operator-controlled telemetry) in the conformance claim itself, not only in supporting documentation.*** *At Level 4 Agentic, CAP-2.1 and CAP-2.2 require AAL-4 (independently verifiable evidence as defined in the registered Protocol Profile). Level 4 Agentic claims about architectural separation therefore require evidence beyond operator-controlled telemetry. Conformance claims at Level 4 Agentic that cannot satisfy AAL-4 for CAP-2 SHALL NOT assert evidence-grade architectural separation.*

22.4 Conformance Statement Grammar

A conformance claim SHALL take one of the following forms:

```
For Level 1 and Level 2:
OVERT Level <N> <Scope> — <Standard-Version>, <Profile-Version>, Scope Summary:
<Scope-Summary>, Exclusions: <Exclusions-Summary>, [ABD: <ABD-Hash>,] <Date>

For Level 3 and Level 4:
OVERT Level <N> <Scope> — <Standard-Version>, <Profile-Version>, Scope Summary:
<Scope-Summary>, Exclusions: <Exclusions-Summary>, Scope: <Coverage-Percent> of
<Denominator-Description>, Denominator: <Independent|Operator-Declared>, Scope
Statement: <Scope-Hash>, Exposure Window: <Exposure-Duration>, [Optimistic:
<Optimistic-Average>/<Optimistic-Worst-Epoch> of in-scope actions,] IAP Topology:
<Single-IAP|Multi-IAP>, [Arbiter Isolation: Software-Only,] [ABD: <ABD-Hash>,] <Date>
```

Where:

- `<N>` is the maturity level (1, 2, 3, or 4).
- `<Scope>` is `Core`, `Agentic`, or `Agentic-Extended`.
- `<Standard-Version>` is the OVERT standard version (e.g., `v1.0.0`).

- `<Profile-Version>` is the registered protocol profile version (e.g., `Profile v1.0`). For Level 1, where no protocol profile is operationally required, this field SHALL read `No Profile` or reference the intended target profile.
- `<Scope-Summary>` is a human-readable summary enumerating the system identifiers, interfaces, and traffic classes covered by the claim. The scope summary SHALL enumerate specific system identifiers (not generic descriptions), the interfaces through which attested traffic flows, and the traffic classes within scope. Generic or free-text-only scope summaries are non-conformant.
- `<Exclusions-Summary>` SHALL take one of three forms: (1) `None (full coverage verified)` — all identified in-scope traffic and interfaces are attested; (2) `Not assessed: <list>` — identified systems or interfaces that have not yet been evaluated for conformance, enumerated by identifier; (3) a specific exclusion list with per-item justification stating why each excluded item is outside the claim scope. Free-text exclusion summaries without per-item justification are non-conformant for Level 3 and Level 4 claims.
- `<Coverage-Percent>` is the declared mediation-scope coverage percentage for the claim.
- `<Denominator-Description>` is a human-readable description of the denominator used for the coverage claim (e.g., `inbound API traffic`).
- `<Independent|Operator-Declared>` states whether the denominator source is independently verifiable or operator-declared only.
- `<Scope-Hash>` is the mediation scope statement hash identifying the published scope artifact.
- `<Exposure-Duration>` is the total duration of unattested operation (exposure windows) during the claim period, expressed as hours and as a percentage of the claim period. If zero, this field SHALL read `0h (0%)`.
- `<Optimistic-Average>` is the claim-period average percentage of in-scope actions processed under optimistic enforcement.
- `<Optimistic-Worst-Epoch>` is the worst single-epoch optimistic enforcement percentage during the claim period.
- `IAP Topology: <Single-IAP|Multi-IAP>` is mandatory for ALL Level 4 claims. Both Single-IAP and Multi-IAP deployments SHALL declare their IAP topology.
- `Arbiter Isolation: Software-Only` is included when Section 4.7.3(f) requires disclosure that the AAL-4 arbiter is not running in a hardware-attested TEE.
- `ABD: <ABD-Hash>` is mandatory for Agentic-Extended claims and identifies the published Attestation Boundary Declaration defined in Section 22.10.
- `<Date>` is the ISO 8601 date on which the conformance assessment was completed.

Examples:

```
OVERT Level 2 Core — v1.0.0, Profile v1.0, Scope Summary: sys-cda-001 clinical
documentation API (FHIR R4 interface, HL7v2 ADT feed), Exclusions: Not assessed:
batch-analytics-002 (scheduled for Q3 assessment), 2026-03-15
OVERT Level 3 Agentic — v1.0.0, Profile v1.0, Scope Summary: sys-agent-010 patient-
facing agentic workflows (API gateway gw-prod-01, FHIR interface, voice endpoint),
Exclusions: None (full coverage verified), Scope: 85% of inbound API traffic,
Denominator: Independent, Scope Statement: sha256:<scope-hash>, Exposure Window: 0h
(0%), IAP Topology: Multi-IAP, 2026-02-28
OVERT Level 4 Agentic-Extended — v1.0.0, Profile v1.0, Scope Summary: sys-agent-010
and sys-cds-020 production agentic workflows (API gateway gw-prod-01, internal RPC
mesh, FHIR R4 interface), Exclusions: None (full coverage verified), Scope: 100% of
declared in-scope actions, Denominator: Independent, Scope Statement: sha256:<scope-
hash>, Exposure Window: 2h (0.03%), Optimistic: 8%/22% of in-scope actions, IAP
Topology: Single-IAP, ABD: sha256:<abd-hash>, 2026-03-15
OVERT Level 1 Core — v1.0.0, No Profile, Scope Summary: sys-ambient-005 ambient
clinical documentation system (voice capture endpoint, EHR integration interface),
Exclusions: Not assessed: sys-transcribe-006 non-AI transcription workflows,
2026-01-10
```

> ***Note.*** *Conformance claims are point-in-time assertions. A conformance claim does not represent ongoing conformance unless accompanied by continuous attestation evidence at Level 3 or above. Implementations SHOULD include the standard version and profile version in all conformance documentation.*

22.5 Conformance Matrix

The following matrix maps the primary control-family requirements for each Level–Scope combination. This matrix is non-exhaustive: conformance additionally requires satisfaction of the normative overlays in Sections 4.1 (AAL mapping), 4.5 (threat model mitigations), 4.6 (risk signal properties and verifiability classification), 4.7 (security considerations including IAP compromise response, log monitor diversity, arbiter hardening, mediation scope attestability, and anomaly triage), 4.8 (cross-boundary attestation for cross-boundary workflows), 22.1 (scope and exclusions disclosure), 22.6 (protocol profile registration), 22.7 (IAP qualification), and 22.8 (qualified assessor requirements). All applicable normative overlays SHALL be satisfied for the claimed level. A cell marked **R** indicates the requirement is mandatory (SHALL). A cell marked **S** indicates the requirement is recommended (SHOULD). A cell marked **—** indicates the requirement does not apply. All requirements are cumulative: Level N includes all requirements from Levels 1 through N−1.

Section	Control Family	L1 Core	L1 Agentic	L2 Core	L2 Agentic	L3 Core	L3 Agentic	L4 Core	L4 Agentic
Part 2									
§5	GOVERN (GOV-1 – GOV-5)	R	R	R	R	R	R	R	R
§6	IDENTIFY (IDE-1, IDE-2)	R	R	R	R	R	R	R	R
§7	PROTECT (PRO-1 – PRO-5)	—	—	R	R	R	R	R	R
§8	ATTEST (ATT-1 – ATT-4)	—	—	—	—	R	R	R	R
§8	ATTEST (ATT-5)	—	—	—	—	—	—	R	R
§9	MEASURE (MEA-1 – MEA-4)	—	—	—	—	R	R	R	R
§10	RESPOND (RES-1 – RES-5)	—	—	—	—	—	—	R	R
Part 3									
§11	TOOL (TOOL-1 – TOOL-5)	—	—	—	R	—	R	—	R

Section	Control Family	L1 Core	L1 Agentic	L2 Core	L2 Agentic	L3 Core	L3 Agentic	L4 Core	L4 Agentic
§12	MULTI (MULTI-1 – MULTI-2)	—	—	—	—	—	R	—	R
§13	CAP (CAP-1 – CAP-2)	—	—	—	—	—	R	—	R
§14	DISC (DISC-1)	—	—	—	—	—	R	—	R
§15	HITL (HITL-1, HITL-4)	—	—	R	R	R	R	R	R
§15	HITL (HITL-2, HITL-3)	—	—	—	—	R	R	R	R
§15.5	SESS (SESS-1 – SESS-5)	—	—	R	R	R	R	R	R
§16	DRIFT (DRIFT-1, DRIFT-3.4)	—	—	—	R	—	R	—	R
§16	DRIFT (DRIFT-2, DRIFT-3, DRIFT-5)	—	—	—	—	—	R	—	R
§16	DRIFT (DRIFT-4)	—	—	—	—	—	—	—	R
§16.1	EVAL (EVAL-1 – EVAL-4)	—	—	—	—	—	R	—	R
Part 4									
§17	Non-Egress	—	—	R	R	R	R	R	R

Section	Control Family	L1 Core	L1 Agentic	L2 Core	L2 Agentic	L3 Core	L3 Agentic	L4 Core	L4 Agentic
	Architecture								
§18	Temporal Binding	—	—	R	R	R	R	R	R
§19	Statistical Measurement	—	—	—	—	R	R	R	R
§20	Auditability	—	—	—	—	R	R	R	R
§21	Legal Preservation	—	—	—	—	—	—	R	R
Part 1									
§4.8	Cross-Boundary Attestation	—	—	—	—	R	R	R	R

> ***Note.*** *§15.5 (SESS) applies at Level 2+ for systems with session-based interactions; systems without session-based interactions are exempt. §16.1 (EVAL) applies at Level 3+ Agentic. §4.8 (Cross-Boundary Attestation) applies at Level 3+ for cross-boundary workflows; single-boundary deployments are exempt. §22.8 (Qualified Assessor) applies as: Level 3 SHOULD, Level 4 SHALL.*

AGENTIC-EXTENDED OVERLAY

Agentic-Extended claims add the following control-family overlays on top of the base Agentic matrix:

Control	Level 1	Level 2	Level 3 Agentic-Extended	Level 4 Agentic-Extended
MCP-1.1	—	Required (if managed MCP)	Required	Required
MCP-1.2	—	Required (if managed MCP)	Required	Required
MCP-1.3	—	Required (if managed MCP)	Required	Required
MCP-1.4	—	Required (if managed MCP)	Required	Required
MCP-2.1	—	—	Required (if custom MCP)	Required
MCP-2.2	—	—	Required (if custom MCP)	Required
MCP-2.3	—	—	Required (if custom MCP)	Required
MCP-2.4	—	—	Required (if custom MCP)	Required
MCP-3.1	—	Required (if external MCP)	Required	Required
MCP-3.2	—	—	Required (if external MCP)	Required
MCP-3.3	—	—	Required (if external MCP)	Required
MCP-3.4	—	—	Required (if external MCP)	Required
MCP-3.5	—	—	Required (if external MCP)	Required
STATE-1.1	—	—	Required	Required
STATE-1.2	—	—	Required	Required
STATE-1.3	—	—	Required	Required
STATE-1.4	—	—	Required	Required
STATE-1.5	—	—	Required	Required
STATE-2.1	—	Required	Required	Required
STATE-2.2	—	—	Required	Required
STATE-2.3	—	—	Required	Required
STATE-2.4	—	—	Required	Required
STATE-2.5	—	—	Required	Required
IDENT-1.1	—	—	Required	Required
IDENT-1.2	—	—	Required	Required

Control	Level 1	Level 2	Level 3 Agentic-Extended	Level 4 Agentic-Extended
IDENT-1.3	—	—	Required	Required
IDENT-1.4	—	—	—	Required
IDENT-1.5	—	—	—	Required

22.6 Protocol Profile Registry Governance

A protocol profile defines the specific cryptographic primitives, serialization formats, and transport bindings that satisfy the normative profile-dependent clauses throughout the standard. Profile-dependent clauses appear in Part 2 (Sections 5–10) for schema definitions, governance artifact formats, and measurement output structures, and in Part 4 (Sections 17–21) for cryptographic algorithms, envelope structures, hash functions, signature schemes, key hierarchies, and evidence serialization.

An implementation claiming OVERT Level 2 or above SHALL reference a registered protocol profile. The profile SHALL cover all profile-dependent normative clauses applicable to the claimed level — not solely those in Part 4.

22.6.1 REGISTRY PUBLICATION

The Protocol Profile Registry SHALL be published at a stable URL with complete version history. Each registry entry SHALL include the profile identifier, version, submission date, registration date, and a persistent link to the full profile specification.

22.6.2 SUBMISSION AND REGISTRATION

Any party MAY submit a protocol profile for registration. The registry maintainer SHALL accept or reject submissions within 90 calendar days of receipt. A submission SHALL satisfy:

1. **Normative coverage.** The profile SHALL specify concrete cryptographic constructions, envelope schemas, key derivation methods, and receipt formats satisfying every normative SHALL requirement applicable to the claimed scope.
2. **Test vectors.** The profile SHALL include published test vectors for every cryptographic operation.
3. **Deterministic verification.** Given identical inputs and the profile specification, any two independent implementations SHALL produce identical cryptographic outputs.
4. **Public specification.** The profile specification SHALL be publicly available for inspection.
5. **Patent disclosure.** The profile submission SHALL disclose any known patent claims that may be essential to implementation.
6. **Conformance test suite.** The submission SHALL include or reference a publicly available conformance test suite sufficient to verify implementation correctness.

Evaluation is mechanical: profiles meeting all criteria SHALL be registered. The registry maintainer SHALL NOT reject profiles on grounds other than failure to meet the criteria above.

22.6.3 SELF-DECLARATION UPON REGISTRY NON-RESPONSE

If the registry maintainer fails to issue a written acknowledgment within 14 calendar days, or fails to render a decision within 90 calendar days of receipt of a complete submission, the submitter MAY publish the profile as a self-declared profile. A self-declared profile SHALL include a prominent notice stating that registry registration was attempted but no response was received, and SHALL use the profile identifier prefix `SD-` to distinguish it from registry-registered profiles. A self-declared profile is valid for Level 1 and Level 2 conformance claims. A self-declared profile SHALL NOT be used for Level 3 or Level 4 conformance claims. Level 3 and Level 4 claims require a registry-registered profile because the evidence-grade and measurement-grade claims at those levels depend on third-party-reviewed cryptographic constructions, test vectors, and conformance test suites that self-declaration cannot provide.

22.6.4 REGISTRY GOVERNANCE POLICY

The registry governance policy SHALL be published alongside the registry and SHALL specify criteria for acceptance and rejection, appeals process, update and deprecation procedures, registry maintainer identity and contact information, and succession conditions. Changes to the governance policy SHALL be published with at least 60 calendar days advance notice.

22.6.5 REGISTRY CONTINUITY

If the registry maintainer ceases operations for more than 180 consecutive calendar days, any organization MAY establish a successor registry provided it incorporates all entries from the prior registry, publishes a governance policy meeting the requirements of Section 22.6.4, and provides at least 90 calendar days public notice before accepting new submissions.

22.7 Independent Attestation Provider (IAP) Qualification

An entity operating as an Independent Attestation Provider (IAP) per Section 3.14 SHALL satisfy the following requirements:

Structural independence:

1. The IAP SHALL NOT hold equity in, be a subsidiary of, or share common management with the AI system operator whose attestations it validates.
2. The IAP SHALL maintain contractual independence: the operator SHALL NOT have unilateral authority to suppress, modify, or delay attestation artifacts.

3. The IAP SHALL disclose any material business relationships with operators whose attestations it validates.
4. The IAP SHALL disclose its beneficial ownership structure to operators upon request.

Operational requirements:

5. The IAP SHALL publish uptime and availability metrics for its notary infrastructure.
6. The IAP SHALL provide auditor access to epoch nonces, digest publication ledgers, and transparency log entries as required by Section 20.
7. The IAP SHALL maintain key management practices consistent with the security requirements of the registered Protocol Profile.
8. The IAP SHALL demonstrate operational capability for all Part 4 sections required by the highest level it services.

Transparency and accountability:

9. The IAP SHALL publish its operational policies, including key management practices, geographic distribution of notary infrastructure, and incident response procedures.
10. The IAP SHALL disclose any security incidents affecting attestation integrity within 72 hours of detection (see Section 4.7.1).
11. The IAP SHALL publish a transparency report at least annually, covering receipt volume, verification failure rates, and any compromise or coercion events to the extent permitted by law.

Portability and resilience:

12. Operators SHALL be able to transition between IAPs without loss of historical attestation data. The outgoing IAP SHALL provide transparency log entries and published epoch data for the transition period.
13. The IAP SHALL support portability escrow: upon operator request, the IAP SHALL export all configuration artifacts, epoch data, and transparency log entries necessary for a replacement IAP to assume attestation services. The export format SHALL be documented and publicly specified.
14. For Level 4 claims, the IAP SHALL cooperate with the operator's annual migration rehearsal (Section 4.7.1(g)) by providing a test environment or equivalent mechanism sufficient to validate the portability escrow.

Any entity meeting these requirements MAY operate as an IAP. This standard does not restrict IAP operation to any specific commercial entity.

22.8 Qualified OVERT Assessor Program

This section defines the requirements for third-party assessors who evaluate OVERT conformance on behalf of operators, relying parties, or regulatory bodies.

22.8.1 PURPOSE

A Qualified OVERT Assessor is a third-party entity that independently evaluates an operator's OVERT conformance claim against the normative requirements of this standard. The Qualified Assessor program establishes minimum competence, independence, and procedural requirements for assessment activities, ensuring that conformance claims at higher maturity levels are subject to rigorous independent evaluation.

22.8.2 ASSESSOR REQUIREMENTS

An entity seeking qualification as an OVERT Assessor SHALL satisfy the following requirements:

Independence:

(a) The assessor SHALL be structurally independent of the assessed organization. The same structural independence requirements applicable to IAPs (Section 22.7, items 1–4) apply to assessors, adapted for assessment: the assessor SHALL NOT hold equity in, be a subsidiary of, or share common management with the organization whose conformance it assesses. The assessor SHALL maintain contractual independence and disclose any material business relationships with assessed organizations.

(b) The assessor SHALL not have provided implementation consulting, system design, or protocol profile development services to the assessed organization for the system under assessment within the 24 months preceding the assessment. This does not preclude prior training or educational engagements.

Competence:

(c) The assessor SHALL demonstrate competence in: (i) OVERT standard interpretation — documented understanding of all normative requirements across Parts 1–5, including version-specific changes; (ii) cryptographic verification procedures — ability to independently verify receipt signatures, co-epoch bindings, transparency log inclusion and consistency proofs, and S3P attestation recomputation; (iii) attestation infrastructure assessment — ability to evaluate deployment topology, arbiter isolation, notary governance, and mediation scope completeness; (iv) governance framework evaluation — documented understanding of the governance frameworks crosswalked in the OVERT Crosswalks companion document (`OVERT_v1.1_CROSSWALKS.md`) sufficient to evaluate OVERT conformance claims in context.

(d) The assessor SHALL maintain a documented assessment methodology aligned with this standard, including checklists, evidence collection procedures, and report templates.

Professional standards:

(e) The assessor SHALL maintain professional liability coverage adequate to the scope of assessments performed.

(f) The assessor's assessment staff SHALL complete annual continuing education in AI governance and attestation, with documented training records. A minimum of 16 hours of continuing education per year is RECOMMENDED.

22.8.3 ASSESSMENT PROCEDURES

Qualified Assessors SHALL conduct assessments using the following procedures:

(a) **Scope validation.** Verify that the claimed conformance scope (systems, interfaces, traffic classes) matches the actual deployment. The assessor SHALL independently confirm that the systems identified in the conformance statement are the systems under attestation, and that the mediation scope statement accurately describes the attested traffic.

(b) **Control verification.** Test each claimed control against normative requirements at the claimed level. For AAL-4 controls, the assessor SHALL independently verify at least one representative attestation artifact per control family (receipt signature, co-epoch binding, transparency log proof). For AAL-1 through AAL-3 controls, the assessor SHALL review the documented evidence.

(c) **Evidence review.** Verify attestation artifacts against transparency log entries. The assessor SHALL independently retrieve receipts from the transparency log, verify inclusion proofs, and confirm that the artifacts presented by the operator match the log entries.

(d) **Signal validation.** Independently recompute risk signals from published data for at least one representative epoch. The assessor SHALL verify that the operator's reported coverage ratio, violation rate bounds, and gap accounting are consistent with the published epoch data and transparency log entries.

(e) **Report generation.** Produce a standardized assessment report per Section 22.8.4.

22.8.4 ASSESSMENT REPORTS

Assessment reports SHALL include:

(a) **Assessed organization and system identification.** Legal entity name, system identifiers, deployment environment description, and attestation infrastructure description (IAP identity, protocol profile, deployment topology).

(b) **Claimed conformance level and scope.** The operator's conformance statement (per Section 22.4 grammar) as claimed.

(c) **Assessment date range and methodology version.** The start and end dates of the assessment period, the OVERT standard version assessed against, and the assessor's methodology version.

(d) **Per-control findings.** For each control applicable to the claimed level and scope: conformant, non-conformant, or not applicable. Non-conformant findings SHALL include a description of the deficiency and the normative requirement not satisfied.

(e) **Identified deficiencies and recommended remediation.** A summary of all non-conformant findings with specific remediation recommendations and, where applicable, a recommended timeline for remediation.

(f) **Assessor certification and signature.** The lead assessor's identity, the assessor organization's identity, the assessor's qualification status (registry identifier per Section 22.8.5), and a signed certification that the assessment was conducted in accordance with this standard and the assessor's documented methodology.

22.8.5 ASSESSOR REGISTRY

GLACIS Technologies or successor registry maintainer SHALL maintain a public registry of Qualified OVERT Assessors. The registry SHALL include: assessor organization identity, qualification date, qualification scope (which maturity levels and scope designators the assessor is qualified to assess), and annual requalification status. Registry governance SHALL follow the same continuity provisions as the Protocol Profile Registry (Section 22.6.5).

22.8.6 LEVEL REQUIREMENTS FOR ASSESSMENT

(a) Level 1 and Level 2 conformance MAY be self-assessed by the operator.

(b) Level 3 conformance SHOULD use a Qualified OVERT Assessor. Self-assessment at Level 3 SHALL be disclosed in the conformance statement.

(c) Level 4 conformance SHALL use a Qualified OVERT Assessor. Level 4 conformance claims not supported by a Qualified Assessor's assessment report are non-conformant.

(d) A managed deployment, hosted reference implementation, or implementation-vendor attestation service MAY improve deployment assurance and evidence readiness, but SHALL NOT be represented as equivalent to Qualified Assessor certification unless the assessment is performed by an entity satisfying the independence requirements of this section.

22.9 Envelope Format vs. Conformance Claims ("OVERT-Compatible")

Systems MAY produce attestation artifacts using the OVERT envelope format (defined in Section 17 and detailed in Annex B) without making a conformance claim. Such a system MAY describe itself as **OVERT-Compatible**: a designation indicating structural compatibility with OVERT tooling and verification procedures, offered as a zero-commitment on-ramp. It does not constitute an assertion that the system satisfies the normative requirements of any Attestation Assurance Level, and SHALL NOT be presented as a conformance claim.

An OVERT conformance claim requires satisfaction of all normative requirements at the claimed AAL level, assessment by a qualified assessor (where required by Section 22.8.6), and disclosure per Section 22.3.

22.10 Attestation Boundary Declaration

Conformant implementations SHALL publish an **Attestation Boundary Declaration** (ABD) specifying which system surfaces are within the attested runtime boundary and which are outside it. The ABD SHALL be published to the transparency log and referenced in the conformance statement.

The ABD SHALL address, at minimum:

Surface Category	In-Scope Indicator	Out-of-Scope Indicator
MCP servers (managed)	Server identity, transport, governance metadata attested per MCP-1	Vendor internal operations, hosting lifecycle
MCP servers (custom)	Binary identity, network isolation, authorization attested per MCP-2	Deployment automation, patching lifecycle
MCP servers (external)	Connection governance, capability scoping, output filtering attested per MCP-3	External server internal security posture
Agent durable state	State sealing, lineage, mutation provenance attested per STATE-1	Storage infrastructure security, backup/recovery
Prompt artifacts	Registration, binding, change governance attested per STATE-2	Prompt engineering methodology, content quality
Identity delegation	Delegation chain, scope narrowing, token lifecycle attested per IDENT-1	IdP implementation, credential storage
Unmanaged clients	(Not attestable — outside runtime boundary)	Client-side code, credential storage, UI integrity
Secret storage	(Not attestable — outside runtime boundary)	Secret rotation, vault implementation, access control

Where a surface is partially in scope (e.g., the arbiter attests transport security to an external MCP server but not the server's internal posture), the ABD SHALL state the boundary precisely.

22.11 Standard Versioning and Errata Policy

This standard is versioned `MAJOR.MINOR.PATCH`.

- **PATCH** releases contain editorial corrections and technical corrigenda only. A technical corrigendum resolves an internal contradiction or defect in the published text and SHALL NOT introduce a new requirement, remove an existing requirement, or change any conformance level definition. A conformance claim citing version `X.Y.Z` remains valid against any later `X.Y` patch release.
- **MINOR** releases MAY add normative content (new controls, annexes, transport bindings, or extension points) but SHALL be additive: an implementation conformant to version `X.Y` remains conformant to version `X.Y+1` without modification. New obligations bind only conformance claims that cite the new minor version or later.
- **MAJOR** releases MAY remove or alter existing normative requirements, renumber sections, or change envelope schemas.

Control identifiers (e.g., ATT-3.5, GOV-5.6) are stable handles: they SHALL NOT be renumbered or reassigned within a MAJOR version. Section numbers MAY change only in MAJOR releases; cross-references in conformance tooling SHOULD therefore bind to control identifiers rather than section numbers.

Errata are published at overt.is alongside each release. The changelog in the front matter of each release enumerates the changes in that release and their classification under this policy.