Kantara Implementation Guidance Report

**ID:** 2019-Z-01 ver. 2.0

**Subject:** Consistency of terms describing proofing types

**Date:** 2019-06-27
**To:** Kantara Assurance Review Board, Kantara Identity Assurance Working Group

**CC:** NIST, GSA

**From:** Zygma Inc.

**Background:**

Close reading of SP 800-63-A in its application reveals inconsistent and slightly contradictory use of descriptive terms for the different types of proofing considered. This report proposes an holistic set of terms, for immediate adoption with Kantara’s IAF and in due course for adoption in a revision to the overall SP 800-63 rev.3.

**Analysis:**

In NIST SP 800-63-A the following terms are used to describe one or more types (or modes) of identity proofing:

|  |  |  |
| --- | --- | --- |
| **Ref** | **term / phrase** | **§ ref** |
| **1** | **remote** or **in-person** identity proofing | 4.4, 4.4.1.5 |
| **2** | **in-person proofing (physical or supervised remote)** | 4.4.1.6 (4) |
| **3** | **remote proofing (unsupervised)** | 4.4.1.6 (5) |
| 4 | In-person proofing … either … physical [or] remote | 5.5.3 |
| 5 | Supervised Remote In-Person Proofing | 5.3.3.2 |
| 6 | in-person … same physical location | 5.3.3.2 |
| 7 | Supervised remote identity proofing | 5.3.3.2 |

The following observations are offered:

1. ‘remote’ and ‘in-person’ are two distinct types (1), but ‘remote’ may be supervised (2) or unsupervised (3);
2. ‘in-person’ can be ‘physical’ or ‘remote’ (4) and ‘in-person’ can mean in the ‘same physical ‘location’ … but if in the same physical location, then same as to whom? There appears to be no requirements for a supervisor for ‘in-person’ proofing, yet that surely goes without saying. It is just never said, and therefore no explicit requirements are stated, unless it is expected that the ‘conventional’ proofing requirements of §4.4.1 are to be applied … by someone. So is there a supervisory role there?
3. If a proofing is ‘unsupervised’, does it matter whether it is ‘remote’ (3) or in the ‘same physical location’ or maybe right alongside a CSP representative. If there is no-one paying any attention (i.e. no-one is supervising) it doesn’t matter what is the physical separation (i.e. remoteness). ‘Remote’ therefore seems to be a red herring;
4. ‘in-person’ implies physically present, especially when a qualifier suggests so (6); therefore to qualify as ‘supervised remote’ (2, 4) appears contradictory;
5. The term ‘in-person’ is very human-centric and if any change of terminology is to be proposed, its ability to embrace IoT concepts would avoid another change downstream, if that can be accomplished without compromising the acknowledged present limitation to humans. Given the scope to mis-interpret ‘same physical location’, would ‘physically-present’ be a preferable phrase?

**Conclusion & Recommendations:**

Clarity could be attained if a single set of terms were used, ensuring that there is clear delineation or defined relationships between them.

**Recommendation for Kantara:**

That the IAF adopts and uses exclusively the following terms in dark red to describe the type of proofing being addressed by those specific terms, as follows:

|  |
| --- |
| ***IDENTITY PROOFING TYPE or MODE – DESCRIPTIVE TERMS*** |
| **Supervised** | **Unsupervised** |
| There is a Supervisory Referee having oversight of the entire proofing process, interacting with the applicant as necessary to ensure that the applicant can fulfil the requirements in §4.4.1. |
| **Supervised (Physically Present)** | **Supervised (Remote)** |
| **Supervised** identity proofing in which the Supervisory Referee is physically present and has physical contact with the applicant (eyes on / hands-on the applicant and any related evidential material). | **Supervised** identity proofing in which the Supervisory Referee has remote contact iaw §5.3.3.2. | Fully-automated processing which ensures that the applicant can fulfil the requirements in §4.4.1. |

**Request to NIST**:

Please review the above and provide the community with a formal response against which application of SP 800-63 rev.3 can be confidently effected, through the adoption of these terms and consistent use of them, to ensure that the applicability of SP 800-63-A clauses is unambiguous. Thus, the terms above would become:

| **§ ref** | **present term / phrase** | **proposed term** |
| --- | --- | --- |
| 4.4, 4.4.1.5 | **remote** or **in-person** identity proofing | Supervised or Unsupervised identity proofing |
| 4.4.1.6 (4) | **in-person proofing (physical or supervised remote)** | Supervised identity proofing |
| 4.4.1.6 (5) | **remote proofing (unsupervised)** | Unsupervised identity proofing |
| 5.5.3 | In-person proofing … either … physical [or] remote | Supervised identity proofing |
| 5.3.3.2 | Supervised Remote In-Person Proofing | Supervised (Remote) identity proofing |
| 5.3.3.2 | in-person … same physical location | Supervised (Physically Present) identity proofing |
| 5.3.3.2 | Supervised remote identity proofing | Supervised (Remote) identity proofing |