

Kantara Comments on NIST open discussion items in relation to 800-63 rev.4.

Liveness test for remote identity proofing #2

The use of liveness test and PAD is specifically focused on fraud detection and introduces significant friction to the ID proofing process. As such, this is only appropriate to make mandatory at IAL3. Below IAL3, it should be up to the agency to determine the appropriateness for their process and risk appetite.

IAL 1 Update - Low assurance identity proofing and enrolment #1

To support this concept, we have provided examples of how the existing tables in 800-63-3 and 800-63A could be updated to reflect the incremental assurance level between with areas highlighted that reflect difference from IAL2. Kantara notes that the addition of the level it is recommending provides for the use of Fair Evidence which, up to this point, has not been used.

Kantara would suggest that the name of this new level not be associated with another level. That is, it not be labeled “1 Enhanced” or “2 Light”. Labeling it “1 Enhanced” could make users think that it is, in essence, Level 1. While labeling it “2 Light”, could diminish Level 2. That being said, Kantara understands that labeling could be a challenge to those who have already been approved as meeting the requirements of an existing level.

Revised Table 6-1 from 800-63-3

	Assurance Level			
Impact Categories	1	Enhanced 1	2	3
Inconvenience, distress or damage to standing or reputation	LOW	LOW	MOD	HIGH
Financial loss or agency liability	LOW	LOW	MOD	HIGH
Harm to agency programs or public interests	N/A	LOW	MOD	HIGH
Unauthorized release of sensitive information	N/A	N/A	MOD	HIGH
Personal Safety	N/A	N/A	LOW	MOD/HIGH

Civil or criminal violations	N/A	LOW	MOD	HIGH
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Revised Table 4-1 IAL Requirements Summary

Requirement	1	Enhanced 1	2	3
Presence	No requirements	In-person and unsupervised remote.	In-person and unsupervised remote.	In-person and supervised remote.
Resolution	No requirements	Same as IAL2	The minimum attributes necessary to accomplish identity resolution. • KBV may be used for added confidence.	Same as IAL2
Evidence	No identity evidence collected	<ul style="list-style-type: none"> • One piece of SUPERIOR or STRONG, OR • Three pieces of FAIR evidence 	<ul style="list-style-type: none"> • One piece of SUPERIOR or STRONG evidence depending on strength of original proof and validation occurs with issuing source, OR • Two pieces of STRONG evidence, OR • One piece of STRONG evidence plus two (2) pieces of FAIR evidence. 	<ul style="list-style-type: none"> • Two pieces of SUPERIOR evidence, OR • One piece of SUPERIOR evidence and one piece of STRONG evidence depending on strength of original proof and validation occurs with issuing source, OR • Two pieces of STRONG evidence plus one piece of FAIR evidence.

Validation	No validation	Same as IAL2	Each piece of evidence must be validated with a process that is able to achieve the same strength as the evidence presented.	Same as IAL2
Verification	No verification	Verified by a process that is able to achieve a strength of FAIR.	Verified by a process that is able to achieve a strength of STRONG.	Verified by a process that is able to achieve a strength of SUPERIOR.
Address Confirmation	No requirements	Same as IAL2	Required. Enrollment code sent to any address of record. Notification sent by means different from enrollment code.	Required. Notification of proofing to postal address.
Biometric Collection	No	Optional	Optional	Mandatory
Security Controls	N/A	Same as IAL2	<ul style="list-style-type: none"> • SP 800-53 • Moderate Baseline (or equivalent federal or industry standard). 	<ul style="list-style-type: none"> • SP 800-53 • High Baseline (or equivalent federal or industry standard).