

IDESG Standards Coordination Committee (SCC)

Standards Adoption Policy Draft 1.0 draft 9: Work item comments

NOTE: Reviewer to complete columns 1-6. Editor to complete column 7.

	1	2	3	4	5	6	7
	Reviewer	Clause/ Sub-clause/ Annex	Paragraph/ Figure/ Table/Note	General , Technical , Editorial	Comment (justification for change)	Proposed change	Recommendation / Disposition
T1	TFTM	1.2	Para 1	Ge	The NSTIC strategy document promotes standards adoption to govern several functional areas (i.e., privacy, security) for the identity ecosystem in addition to the “methodology for interactions in data regarding identity between independent parties” as cited in para 1.	The NSTIC strategy promotes the adoption of existing, open standards to ensure the privacy, security, and interoperability of data interfaces and use in the identity ecosystem. In addition where new standards may be needed, the NSTIC strategy promotes non-proprietary, international, and industry-led standards development efforts.	Accepted
T2	TFTM	1.4	Para 1 and 2	Ge	This section of the policy is important in defining the scope and jurisdiction of the SCC standards adoption policy. There are numerous instances where the implementation of a standard is defined through an implementation specification or “profile” (e.g., SAML 2.0 SSO profile, SAML 2.0 E-Gov profile, SAML 2.0 FICAM profile), where the profile defines how the standard is to be implemented for a specific use case or community. The question is whether the SCC would process such versions of a standard through the standards adoption process and include in the IDESG Standards Registry.	Specifications (e.g., profiles) for the implementation of standards for a specific community or use case(s) may be reviewed and processed by the SCC under the SAP, provided that the underlying standard for the profile has been reviewed, adopted and included in the IDESG Standards Registry.	Accepted, as a new Section 1.5. First few words modified to make it more clear.
T3	TFTM	1.4 or 2	New section 2.7 (?)	Ge	It is anticipated that a committee or stakeholder may recommend adoption of just a portion or sections of a standard rather than the entire standard – the SAP should address this type of circumstance.	SCC SAP scope is limited to the review and adoption of standards in entirety. The SAP scope does not cover portions or sections of a standard.	Incorporated into new Section 1.5. Note, the comment is ambiguous about handling portions; this proposed edit assumes that handling portions is desirable.

	1	2	3	4	5	6	7
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H0	ACH	2	Line 147		Unclear if section 2 is statements of policy, forward-looking intent or principles.	A) For any “will” statements, consider making them affirmative policies – “IDESG works with...” rather than “IDESG will work with...” {{ Or am I misreading the meaning of “will” – is this “shall” or “intends to”? }} B) Consider separating Principles, Assumptions, Policy and Statements of Intent. These will have different weights when implementation decisions are made.	Declined. Save for a future significant rewrite.
H1	ACH	2.1	Line 150		The first sentence is a bit wobbly. <ul style="list-style-type: none"> prefer to start with a positive statement is this a firm policy of IDESG? IDESG contains all its committees so not necessary to name both the IDESG and also the Standards Committee 	Please consider making this a positive statement and a firm statement. e.g. “IDESG shall encourage and assist creation and adoption of data specifications or standards.” And so on...	Accepted..
H2	ACH	2.1	Line 152		“encourage and assist the creation of ... activity” – this sentence probably needs to be broken apart – it does not parse easily.	Split the statement of intent into 3-4 separate sentences or drop some of the ‘list-like’ language or optional language	Accepted.
H3	ACH	2.1	Para 1		Caution advised on the ‘role of IDESG’ statement – in this context IDESG is not about ID Management for and by stakeholders. It is more about encouraging standardization and use of standards for communicating about identity information.	Be clear about the role of IDESG with respect to Standards and the Ecosystem.	Declined. With the rewrite, the paragraph's focus is narrower.

	1	2	3	4	5	6	7
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H4	ACH	2.2			The heading does not match all of the statements in the section. If the policy is that IDESG shall adopt and disseminate standards that meet the needs, then keep this point to that. If the policy is that IDESG shall engage Standards Developers as appropriate to supply them with ‘our’ communities’ requirements and also to join their working teams to develop the standards, then keep it to that.	Clarify policy statement and stick to one subject – split into 2 policies if needed	Declined. This is intended as a summary statement of the relationships expected between IDESG and standards developers -- and that relationship may have multiple facets.
H5	ACH	2.2	Line 170		“Deserving” and “Useful” are subjective terms and probably don’t say what the author intended (they sound judgemental).	Choose different words that indicate that we evaluate based on criteria and neutralize the judgement language.	Declined. IDESG *is* expected to make judgments about standards.
H6	ACH	2.3		Ge	To what degree is IDESG required to follow Government Policies versus its own? Not sure if it is relevant to state that government policies are relevant to this document.	Remove reference to ‘government policies’ and retain reference to ‘National Strategy’	Declined. Here, government polices are used as an example of how open standards are defined (not a constraint). Those polices are relevant as an example, as they specifically spawned the National Strategy.
H7	ACH	2.3		Ge	The section title is general but the text reads as specific to “Open” ness.	Reorder the paragraph so that the division of concerns between ‘fit for purpose’ and ‘open’ happens first, then explanations of those concepts follows.	Declined. Save for a future significant rewrite.
T4	TFTM	2.3	Sentence 1	Ge	“Open standards”...mean data standards which have...” -- The standards to be adopted for the IDESG will include standards much broader than just “data standards” – and will include privacy, security, usability standards as well.	Delete “data” from sentence 1.	Accepted.
H8	ACH	2.4		Ge	Repeat of ‘will’ or ‘shall’ comment	If statement of future intent, keep ‘will’ If statement of fact, use ‘shall’ (or similar)	Harmless; accepted where relevant.

	1	2	3	4	5	6	7
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H9	ACH	2.4		Ge	Grammar – ‘as specified in Section 3 below’ – to what does that refer? 2 nd sentence: too many commas	Reorder sentence for clarity	Partially accepted.
H10	ACH	2.5		Ge	Shorten for clarity	The SCC shall be the primary point of contact and oversight of approved liaison arrangements with Standards Developers.	Partially accepted.
H11	ACH	2.6		Ge	Title is misleading. Much of this block should be in the Overview sections not in the Policy section.	Adoption of standards referenced in IDESG work products is mandatory and must precede final approval of IDESG work products.	Declined, but limited re-write attempted of the key sentence.
T5	TFTM	3.1	Sentence 1 item (b)	Ge	“Nominations for candidate standards may come from ... (b) substantive IDESG committees (such as the Security Committee)...” – It is not clear what is implied by the term “substantive”, but any committee should be able to make standards nominations to the SCC.	Delete “substantive” from sentence 1.	Accepted
H12	ACH	3.1	Line 223	Ge	What is an “Identity ecology” ?		Declined. No change was offered.
H13	ACH	3.1		Ge	The text in the preamble does not match the diagram. E.g. the source of candidates – these sources are not listed in the picture. Is this paragraph policy? Or is it descriptive?		Declined. No change was offered. Chart's authors believe it is consistent with text.
H14	ACH	3.1	Picture	Ge	The term “Formal IDESG Approval Process” implies that there is an Informal process.	Remove “Formal” from the box	Acceptable, but will require a graphics edit.
H15	ACH	3.1.1	First bullet	Ge	Is there a difference between requirements ‘identification’ and ‘derivation’? Picky: aren’t the existing standards being analysed to see how they satisfy the requirements? (not the other way around)? Sub bullets: one says “satisfy” the requirement & the other says “address” the requirement	Change language for consistency	Minor edit made, but mostly declined as a significant rewrite. “Satisfy” and “address” mean two different things here.

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H16	ACH	3.1.1	Second bullet	Ge	Isn't the 'known gaps' bullet the same as 'Stakeholder inputs' ?	Merge bullets 2 and 3 and condense language	Accepted.
H17	ACH	3.1.1	Line 262	Ge	The paragraph reads as if IDESG is directing the Standards Developer to do work for us. Is this the intent?	Shift language towards: IDESG will engage an appropriate Standards Developer's standards development process...	Partially accepted. Better covered in 3.1.2.
H18 *	ACH	3.1.2		Ge	This section seems out of place. Should the policy be that a selection process should occur, and the criteria and detailed procedural steps might appear in an appendix.	Keep policy and process in the main body of the document, annex procedural text to it.	Declined. Save for a future significant rewrite. Editor's note: while I have serious doubts about the viability of this approach, I think it does correctly state the drafting committee's intent.
H20 *	ACH	3.2		Ge	Is the exclusion of a Standards Deprecation or lifecycle management process deliberate?	Consider including mechanisms to depreciate or remove standards from the approved list	Declined. Already answered in Section 3.2.6.
H21	ACH	3.2	Line 311	Ge	What is the meaning of 'dynamic' ?	Clarify or remove word	Accepted.
H22	ACH	3.2.1	Line 314	Ge	'identity related...' seems to constrain too much	Remove the word 'identity'	Accepted.
H23	ACH	3.2.1		Ge	Is the intent to publish a copy of the standards text in the wiki? Or just a reference? What if the standard is behind a paywall? Are there licensing issues?		No change was offered. The wiki is intended to point to and summarize or characterize, but not contain, standards.
P1	Privacy Committee [via Ann Racuya- Robbins]		L301+		Undergoes all MC and plenary approval processes as defined in the RoA.	Undergoes all Privacy Committee, MC and Plenary approval processes as defined in the RoA.	Partially accepted. Rewritten to take this point into account, but without trying to embed the RoA in this document, as the RoA might change.

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H27	ACH	3.2.5		Ge	Question: is there such a thing as a Plenary Ballot in the RoA? Is the intent to have a Plenary Vote? If so, perhaps reconsider – the requirement to vote is actually a failure mode in the consensus process. (read ROA 5.2, 5.3)	Ensure that the intent is reflected in the policy text	Accepted.
H28	ACH	3.2.5	Line 344	Ge	Is the statement of applicability from the originating committee included in the report? (i.e. the suitability of the standard)	Consider including the statement of applicability in the report of openness and availability	No change was offered. Other policies or committees (or the RoA) may choose to impose other requirements.
H29	ACH	3.2.5		Ge	Is the decision about the Report? Or about the Recommendation?	See prior comment as well – language is not clear although the intent can be inferred. Simplify the sentence structure to make the policy explicit on what needs decision and how to decide.	Partially accepted.
H25	ACH	3.2.6	Line 327	Ge	The line with “Should” – this text does not belong in this document – it is a statement of future intent not process. Paragraph is a bit flowery – perhaps the intent is to state that the nominator must ensure that the nominated standard meets the adoption criteria?	Remove or describe the process not the intended procedure	Declined. Cannot locate site of proposed edit..
H26	ACH	3.2.6	Lines 334+	Ge	Condense the language for clarity	SCC will review each candidate standard against the Standards Adoption Criteria. The IDESG community will be invited to provide feedback on the candidate standard with respect to the Adoption Criteria. The SCC will provide a report on the review and feedback process to the IDESG Plenary.	Declined. Seems to address a different topic.
H30	ACH	3.2.6		Ge	Check the word ‘approved’ – what is approved – the report or the standard? Should this be ‘adopted’?	Please clarify the language	Accepted.
H24	ACH	3.2.x		Ge	The auto-numbering is broken	Fix auto-numbering	No apparent problem.

	1	2	3	4	5	6	7
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H36	ACH	3.3		Ge	Missing a Role/Responsibility? Should this section mention the roles and responsibilities of the Plenary and MC?	Add role/responsibility if needed.	Declined. No change was offered. Save for a future significant rewrite.
H31	ACH	3.3.1		Ge	Sentence 1 is extraneous Doesn't the Standards Inventory list all standards, not just the open ones?	Remove sentence 1	Accepted.
T6	TFTM	3.3.2	Sentence 1	Ge	Same comment as above.	Delete "substantive" from sentence 1.	Accepted.
H33	ACH	3.3.3		Ge	Missing a role? Committees must actively check for the existence of standards that could be reference and use standards as the basis for their work where practical.	Verify that suggested role is/is not needed.	Declined. No change was offered. Save for a future significant rewrite.
H34	ACH	3.3.3		Ge	Is it IDESG policy that other organizations (Standards Developers) should be within our mandate? Might want to reconsider that inference.	Remove statements that state that SDOs are governed by IDESG policy.	Partially accepted, to the extent clear.
H35	ACH	3.3.3	Line 376	Ge	Is this a deliberate limitation to only SDOs for Security and Identity Management?	Broaden limitation or remove it or confirm the restriction.	Accepted.
H38	ACH	4		Ge	It is not clear to me how to use this section to determine a 'degree of open-ness and availability' – these are factors to consider, but don't provide a pragmatic scale.	Clarify the intent of the 'characteristics' and 'requirements' in this section	Declined. No change was offered. Save for a future significant rewrite.
H37	ACH	4.1	Line 386	Ge	Perhaps document review and maintenance should be its own section to put sufficient weight on that topic	Create a Document Review and maintenance section	Declined. No change was offered. Save for a future significant rewrite.
P2	Privacy Committee [via Ann Racuya-Robbins]		L386		This Standards Adoption Policy should be reviewed and refreshed by the SCC as needed and	reviewed and approved for adoption by the Standards Committee, Privacy Committee, MC and Plenary as defined in the RoA, periodically or at a minimum every 3 years.	Partially accepted: neutral reference to RoA requirements added (as we suspect the RoA process itself needs more clarity, and will be augmented or edited).

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H39	ACH	4.1		Ge	Picky: the reference to Section 1.2 is quite vague – reading Section 1.2 it is not clear what the intent of this statement is	Clarify the statement or remove the reference	Partially accepted: rewritten.
H40	ACH	4.1		Ge	This section mixes ‘criteria’, ‘principles’, ‘characteristics’ and ‘requirements’ without explaining how those different words apply.	Fix the choice of words to suit the intended meaning.	Declined. No change was offered. Save for a future significant rewrite.
H41	ACH	4.1		Ge	Reference is made to a ‘common constellation’ without enumerating that constellation.	Remove the first sentence or make it specific.	Declined.
T7	TFTM	4.1.1	Criteria 1, 2, 3, 5	Ge	Criteria 1, 2, 3, and 5 really apply to the SDO itself rather than the specific standard. It would simplify the process if the originating SDO was reviewed once against these criteria so that criteria 4 and 6 (i.e., functioned-oriented and relevance) are the only criteria to be applied to subsequent reviews.	Add clause that the originating SDO needs to be reviewed once against criteria 1,2, 3 and 5 so that criteria 4 and 6 (i.e., functioned-oriented and relevance) are the only criteria to be applied to subsequent reviews.	Accepted.
T8	TFTM	4.1.1	Criteria 1, 2, 3, 5	Ge	ANSI accreditation should satisfy each of these criteria.	Add clause that ANSI accreditation satisfies criteria 1, 2, 3 and 5.	Declined -- would require further significant policy discussion.
H42	ACH	4.1.1		Ge	Question: where did this list of ‘primary characteristics’ come from? Is there a reference to another work missing? Or did the Standards committee develop these characteristics independently (which would be quite ironic given the subject)?	Ensure that other works are referenced if necessary.	Extensive references to other sources were in earlier drafts, but deleted for space reasons here.
H43	ACH	4.1.1	Line 398	Ge	What is the point that the author is intending to make? The terms ‘generally been found appropriate’ and ‘too high’ are possibly too loose to use as in a Primary Principle	Remove relative statements or at least include an indication of the overall scale. E.g. ‘too high’ – is there information about what degree of price sensitivity IDESG must be aware of?	Declined -- would require further significant policy discussion. The scope of this policy statement is not intended to include defining detailed metrics for each criterion.
H44	ACH	4.1.1	Line 403	Ge	Why is ‘consensus methodology’ necessarily a primary characteristic? Fairness and due process can be achieved through other means such as voting.	Confirm that IDESG requires other entities to use consensus methodologies. Consider that this may limit IDESG’s ability to include relevant SDOs.	As used in standards policy outside IDESG, the term is broader, and can include vote-based systems.

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H45	ACH	4.1.1	Lines 403 – 409	Ge	These sub-bullets are stating that the absence of a thing might be significant. This is not possible to observe or measure.	Please turn this around to say what should be present rather than what might be absent.	Declined. No change was offered. Sometimes it is accurate to say that what's desired is the absence of a bad thing.
H46	ACH	4.1.1	Lines 410-419	Ge	Same as above. Also, another reason to keep drafts confidential is to protect intellectual property prior to patent declarations or searches. Premature disclosure of contributed content may make later processes impossible.	Clarify language	Declined. No change was offered. Sometimes it is accurate to say that what's desired is the absence of a bad thing.
H47	ACH	4.1.1	Line 417	Ge	Please clarify what point is being made – is IDESG looking for ‘false transparency’ and how would this be measured	Clarify language	Declined. No change was offered. The scope of this policy statement is not intended to include defining detailed metrics for each criterion.
H48	ACH	4.1.1	Line 422	Ge	Not sure that this is obvious. Functional descriptions can cause lock in too.	Clarify language	Declined. Functional description is a necessary though not sufficient requirement.
H49	ACH	4.1.1	Line 435	Ge	“all stakeholders” is possibly too broad. If ‘no cost’ is intended then please say it that way.	Clarify language	Declined. Drafting team's take was this: In some cases, "availability" may be direct to consumers, and in other cases, it may be indirect via services providers.
H50	ACH	4.1.1	Line 439	Ge	Unsure why US Government Policy is referenced in this IDESG policy. Also, the first bullet mixes up de facto regulatory requirements with the types of policy that IDESG intends to endorse	Clarify intent or remove reference to Government Policy	Minor edit made; but the point of that sentence and the next one is to describe contrasting views that must be taken into account.
T9	TFTM	4.1.1	Criterion 5	Ge	Criterion 5 “Affordability” can be simplified since the relevant criteria are: is the standard publicly available at a reasonable price? These are simple yes or no criteria.	Change Criterion 5 to: Publicly available at a reasonable price.	Declined. Criterion is intended to be about more than the price of a copy.

	1	2	3	4	5	6	7
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H51	ACH	4.1.2	Line 462	Ge	Unsure what the purpose of this bullet point is. Is the requirement that there must be a mandatory minimum public review period/procedure? If so, then what is that minimum?	Please clarify	Accepted.
H52	ACH	4.1.2	Line 472	Ge	This sub-bullet appears to be an opinion rather than a requirement statement.	Please clarify	Accepted. The point is edited down -- it's intended to explain why this criterion is distinct and has value.
H53	ACH	4.1.2	Line 480	Ge	Is this sub-bullet a transparency requirement?	Please clarify	No, it's not. Declined. No change offered.
T10	TFTM	4.1.2	Criteria 1, 2 and 3	Ge	It appears that section 4.1.2 adds 3 additional criteria to the 6 criteria of 4.1.1. for a total of 9. The first comment above on 4.1.1 also would apply to the criteria for 4.1.2 since these apply to the SDO. Therefore, it would facilitate the process to review these criteria for the originating SDO once and apply criteria 4.1.1 # 4 and 6 (function-oriented and relevance) to the applicant standard.	Add clause that the originating SDO needs to be reviewed once against 4.1.1 criteria 1,2, 3 and 5 and 4.1.2 criteria 1, 2 and 3 so that 4.1.1 criteria 4 and 6 (i.e., functioned-oriented and relevance) are the only criteria to be applied to subsequent reviews.	Accepted, but accomplished in a more terse way at the beginning of Section 4.
T11	TFTM	4.2			The purpose of 4.2 in the adoption policy is unclear. This section is intended to apply to new, developing methodologies and processes that have not matured to the point where a legitimate standards development process can be conducted. Such developing methodologies could be applicable to pilots, test and other limited scope implementation in the identity ecosystem, but not the large-scale identity ecosystem under the SAP. This section "Special Requirements for Early-State Technologies" might best be separated from the adoption policy and issued as guidance or considerations for early-stage technologies to avoid confusion in this document.	Recommend to separate this section "Special Requirements for Early-State Technologies" from the adoption policy and issue as guidance or considerations for early-stage technologies to avoid confusion in this document.	For discussion. Tentatively declined. If this section is removed, as TFTM suggests, that would take all early-stage standards projects out of the SAP review process. Is that desirable?

	1	2	3	4	5	6	7
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H54	ACH	4.2	Line 511	General	'worthy' is a judgement work	Please remove the word 'worthy'	Partially accepted. However, the whole point of the SAP is that IDESG *will* be in the business of making evaluative judgments.
H55	ACH	4.2	Line 525	General	What is 'NTTAA'	Please clarify	The federal law that informs the NSTIC's standards criteria/. However, it can be safely removed as redundant here.
R1	Ann Racuya- Robbins		L552		<i>Relevance:</i> The degree to which the developing technology is consistent with and fulfils the NSTIC Guiding Principles is a necessary consideration even for early-stage projects.	Does this mean the Early Stage Projects will go through Privacy Review like any other project?	If they are proposed to receive IDESG endorsement of some sort, then yes.

* There is no H18 (consecutive numbering flaw).