# Concerns regarding draft SP-800-63-3

## Levels of Assurance vs. Identity Assurance Levels

In the current version of SP-800-63-2, there are 4 Levels of Assurance (LOA) for Identity. LOA1 does not require remote identity verification and utilizes self-asserted data. LOA2 allows for remote identity verification and requires that either 1 form of government issued ID or a financial/utility account be verified. LOA3 required that both a government issued ID and financial/utility account be verified. LOA4 is in-person verification.

In the newest version, NIST has removed the term LOA and has split them into 3 categories: Identity Assurance Levels (IAL), Authentication Assurance Level (AAL), and Federation Assurance Level (FAL). As an Identity Proofing solution, our focus is only with the IALs. The new IALs have been consolidated from 4 levels to 3. The new IALs are:

- IAL1 – No Identity Proofing required (Self-Asserted)
- IAL2 – Remote Identity Proofing (requires document verification)
- IAL3 – In-person Identity Proofing

In order to achieve IAL level 2, it would require that at least 1 piece of STRONG evidence be used. By definition, a STRONG level of evidence must contain a photo/image/biometric of the individual. NIST has confirmed this to mean that some form of remote document verification technology would be required in order to verify the photo/image/biometric. We feel this is too restrictive and does not provide agencies and organizations enough flexibility to determine the level if Identity Proofing needed for given situations. By only having one level of remote identity proofing (IAL2) which, as it currently is written, requires document verification, this creates an undue burden on agencies and organization to have to provide this level of proofing for every remote transaction. This would significantly increase the cost, user friction, and performance (pass rate) of existing solutions – particularly those that currently leverage LOA2. It would be our recommendation to NIST to return to 4 levels of IALs to provide more flexibility. Our suggestion could be as follows:

- IAL1 – No Identity Proofing required (Self-Asserted)
- IAL2 – Remote Identity Proofing using verification of government ID and financial/utility account (this utilizes current LOA3 Identity Proofing capabilities)
- IAL3 – Remote Identity Proofing at IAL2 level plus the addition of document verification
- IAL4 – In-person Identity Proofing

## Document Verification

While current technology does exist to allow the digital capture of a document and then compare that image to a 'selfie' image of the individual, this is a very cumbersome, can be inaccurate depending on quality of document as well as the capability of person trying to capture image and much more costly procedure. All of this **will** result in a much lower success rate of Identity Proofing and increased user

friction. It is our position that many agencies and organizations are not looking to provide more friction for their consumers and provide a lower ability to successfully proof individuals. In addition, you are now requiring consumers to provide documentation they may not feel comfortable in providing such as Driver's License or Passport. Many document verification solutions also are limited to the types of documents that can be scanned or captured and these are typically Driver's Licenses and Passports. If you are restricted to only these 2 forms of identification, you are also limiting the valid population that has access to these. Many of the younger as well as the older demographic may not have a driver's license and less than 50% of the U.S. population has a passport.[1]

Document verification can and should play a role in the identity proofing process. There are situations where it would be necessary to provide an extra layer of verification or in instances where there might be limited data available, then document verification would be a viable solution. It is our position that document verification should not be a requirement for every remote identity proofing transaction.

## "Issuing Source" for verification

NIST has classified the levels of evidence that can be used into 4 categories (Weak, Fair, Strong, and Superior). Each category indicates that information is validated against the "issuing source". Most data validations today are not performed directly against an issuing source (such as a bank for credit card or DMV for driver's license) but against an authoritative source (such as a credit bureau) that affirms the information and assumes that the process the "issuing source" used to create the data performed proper vetting of identification at the time the data was created. For example, the process of obtaining a new Driver's license requires in-person verification along with providing many forms of identification before the new Driver's License is issued. We believe requiring validations using the "issuing source" is unrealistic and many Identity Proofing solutions will not be able to provide this level of validation.

As mentioned above, document verification will be required for **all** IAL2 transactions. In today's environment, the pieces of documentation that contain both PII and photo/image/biometric data are extremely limited. For the majority of the U.S. consumers, that would be either a driver's license or a passport or possibly a US Resident Card. Although information contained in these documents can be validated, today the data typically cannot be verified directly against the issuing source. Meaning there is not a method of directly going to neither the state that issued the Driver's License nor the State Department that issued the Passport document. Document verification technology today is looking at the 'correctness' of the document, meaning it is looking at format, holographic images, watermarks, positioning of text and abnormalities of the physical document. It is not looking at the PII data and comparing it directly against a database (of sorts) to confirm that the state or country actually issued this document.

[1] The Expeditioner, "How Many Americans Have a Passport" December 2016, http://www.theexpeditioner.com/2010/02/17/how-many-americans-have-a-passport-2/