

MINUTES
Commonwealth of Virginia
Identity Management Standards Advisory Council (IMSAC)
Council Meeting
Monday September 12, 2016

Commonwealth Enterprise Solutions Center
Multipurpose Room 1222
11751 Meadowville Lane
Chester, VA 23836

ATTENDANCE

Members Present:

Lisa Kimball, Chairperson
Dave Burhop
Katie Crepps
Nelson Moe
Michael Watson
Jeffrey Zubricki

Staff Present:

Joseph W. Grubbs, Ph.D., VITA/IMSAC Staff
C.A. Sparkes, VITA
Jay Smith, VITA
Greg Richards, OAG

Members Absent:

Jeremy Grant
Tom Moran

Call to Order

Chairperson Kimball called the meeting to order at 1:10 p.m. in multipurpose room 1222 at the Commonwealth Enterprise Solutions Center in Chester, VA.

Roll Call was taken for IMSAC members. All members were present, except Jeremy Grant and Tom Moran, therefore quorum was met.

Note: The IMSAC meeting agenda packet including all of the presentation materials may be accessed on the VITA website at: <http://www.vita.virginia.gov/About/default.aspx?id=6442474173>

Old Business

Meeting Minutes

Chairperson Kimball called for a motion to approve the minutes from the June 30, 2016, meeting dedicated to receive public (verbal) comments on the first set of draft guidance documents, and the minutes for the June 30, 2016, standing IMSAC meeting. A motion was made and seconded.

During discussion, Mr. Burhop asked about the discussion during the June 30, 2016, standing meeting on the topic of identity management of non-person entities. He requested for the topic to be raised for further consideration at the appropriate time during the meeting. Chairperson Kimball recognized the request then called the vote, and the minutes for both of the June 30, 2016, meetings were approved without objection.

Executive Directive 7 Status Report and Workshop

Chairperson Kimball raised the second item under Old Business, a status update from Jay Smith, VITA, on the final report, analysis, and findings being conducted under Executive Directive 7: *Leveraging the Use of Shared Data and Analytics* (ED7).

Mr. Smith gave a brief summary of the findings from the ED7 analysis, which included a comprehensive review of legal, privacy, and governance concerns as they relate to data sharing; recommendations on how to make data generated by state agencies more accessible and usable “open” data; recommendations for data sharing governance, ethical use, and authority; and recommendations of high-value analytics projects aligned with the Governor’s priorities.

Following the status update, Mr. Smith presented a series of questions designed to gather insight from IMSAC members on the core issues addressed by ED7. A discussion followed with IMSAC members highlighting primary challenges relating to data sharing, analytics, and governance faced by their organizations.

Mr. Burhop began the discussion by noting statutory restrictions and the need to explore legislative changes to enable data sharing by agencies across Secretariats. Mr. Watson distinguished between internal and external data sharing, saying that the opportunities and constraints differ when agencies share data within their Secretariat versus outside of their Secretariat. He also said agencies should have greater consistency in their data sharing agreements, rather than allowing significant disparities in point-to-point agreements.

Speaking from a private industry viewpoint, Ms. Crepps stressed the importance of establishing a most trusted source of data for core person information – a “single source of truth” – as the maintenance of data becomes increasingly federated in multiple source systems and cloud-hosted solutions. Mr. Burhop agreed, citing the experience of the Virginia Department of Motor Vehicles and Department of Social Services in their effort to build the Commonwealth Authentication Service.

The topic of anonymization – the removal of identifying characteristics from person data – came up in the discussion, and Mr. Burhop raised the potential for having enterprise-level licenses for anonymization toolsets. Mr. Smith responded to a question from Mr. Moe, pointing to best practices from cross-state comparisons, including Michigan, North Carolina, Illinois, and Indiana.

Mr. Burhop discussed opportunities for identity management, namely forming a single identity for each citizen of the Commonwealth, afforded by the multiple sources of person data within state agencies. Mr. Moe pointed out the risks associated with multiple databases containing similar information on the same person entities and encouraged Mr. Smith to work closely with Mr. Watson, the Chief Information Security Officer for the Commonwealth.

Mr. Smith turned to the topic of open data, and Chairperson Kimball asked the representatives from private industry – Ms. Crepps and Mr. Zubricki – if their organizations maintained open data and made it available to the public. Both said their organizations openly share branch or store locations. Mr. Moe distinguished between open data, which organizations choose to make available, and other forms of data that require a formal request, such as under the Freedom of Information Act. Mr. Zubricki stressed the importance of organizations having a governance process for determining what data should be made available.

New Business

Chairperson Kimball closed the Old Business portion of the agenda and opened the first item under New Business, the recommendation to transmit to the Secretary of Technology the first set of IMSAC Guidance Documents prepared pursuant to § 2.2-437.C, *Code of Virginia*.

Recommendation to Transmit Revised Guidance Documents

Dr. Grubbs introduced the IMSAC Guidance Documents, which he said had been revised based on IMSAC's direction to align the minimum specifications with the Public Review version of the National Institute of Standards and Technology (NIST) Special Publication 800-63-3. The two IMSAC Guidance Documents recommended for transmittal to the Secretary of Technology:

1. Commonwealth of Virginia Information Technology Resource Management (ITRM)
Guidance Document: Trust Frameworks
Purpose: The purpose of this document is to establish minimum specifications for operational trust frameworks to enable and support a trust-based identity management system.
2. Commonwealth of Virginia Information Technology Resource Management (ITRM)
Guidance Document: Identity Proofing and Verification
Purpose: The purpose of this document is to establish minimum specifications for identity proofing and verification to enable registration and electronic authentication events within a trust-based identity management system.

Dr. Grubbs said the documents also had been revised to address comments received during the 30-day public comment period. The following comments were submitted on July 13, 2016, via the Virginia Regulatory Town Hall. The staff response and a description of the revisions have been shown in brackets [] and *italicized*:

1. For purposes of setting minimum standards for identity proofing and issuance of credentials/tokens/authenticators, continue to use levels of assurance as defined in the latest approved NIST 800-63 document series. This will be especially important to both identity providers and relying parties in the commercial sector. *[Noted]*
2. On pages 21 and 22 under discussions of Level of Assurance 2, 3, and 4, add references to "virtual in-person proofing" as an approved method consistent with draft 800-63A. *[The Assurance Model in this document has been amended to be consistent with the Public Review version of NIST SP 800-63-3. A definition for "virtual in-person proofing" based on NIST SP 800-63A has been added to this document.]*
3. On page 15, add a definition of "virtual in-person proofing" perhaps based on section 5.4.3 of draft 800-63A. *[A definition for "virtual in-person proofing" has been added to this document, consistent with NIST SP 800-63A.]*
4. On page 12, add a definition of "remote network identity proofing." This could be modeled after language contained in NIST 800-63 series documents. *[The term "remote network identity proofing" has not been defined in the NIST SP 800-63 document series. However, the term "Remote" has been defined in the NIST SP 800-63 document series and in this document, and the definition covers remote transactions across a network in an identity proofing context.]*

Finally, Dr. Grubbs said the IMSAC Guidance Documents had been revised to be completely consistent with the definitions established in the Electronic Identity Management Act, § 59.1-550, *Code of Virginia*. He then gave a brief overview of the transmittal process, how the documents will be transmitted to the Secretary, and concluded the presentation. Chairperson Kimball called for a motion, and the motion made and seconded. The Chairperson opened the floor for discussion.

Mr. Moe asked about the formal status of Guidance Documents, as defined under the Administrative Process Act (§ 2.2-4000 et seq.).¹ Dr. Grubbs said staff would work with the Office of the Attorney General to outline the formal status and prepare the transmittal memorandum to be consistent with the Administrative Process Act. He said going forward staff would provide regular briefs to IMSAC on the status of the documents.

¹ § 2.2-4001. "Guidance document" means any document developed by a state agency or staff that provides information or guidance of general applicability to the staff or public to interpret or implement statutes or the agency's rules or regulations, excluding agency minutes or documents that pertain only to the internal management of agencies. Nothing in this definition shall be construed or interpreted to expand the identification or release of any document otherwise protected by law.

Ms. Crepps requested a revision to the Guidance Documents to incorporate the term “Physical In-Person Proofing” into the definitions section. IMSAC members agreed unanimously, and the motion was updated to reflect this final modification to be made prior to transmittal to the Secretary of Technology. Dr. Grubbs said the definitions in all of the Guidance Documents will be aligned for consistency. Chairperson Kimball called for a vote, and the recommendation to transmit was approved unanimously

Updated IMSAC Architecture Model, Work Plan, and Schedule

Chairperson Kimball recognized Dr. Grubbs to present the updated IMSAC Architecture Model, Work Plan, and Schedule. Dr. Grubbs said the IMSAC planning documents had been updated and the next set (Set #3) of IMSAC Guidance Documents would cover Assertions, Participant Requirements, and Certification/Certification Criteria. He requested approval for staff to proceed with these documents.

Mr. Moe said it would be important to tie together the analysis, findings, and recommendations from the ED7 report, presented by Mr. Smith under Old Business, with IMSAC Guidance Documents. Mr. Burhop concurred, citing the area of governance. Dr. Grubbs noted this requirement and indicated that he would work with the ED7 team to ensure alignment. Chairperson Kimball asked if IMSAC members had any additional comments or questions and, hearing none, closed the agenda item.

Public Comment

Chairperson Kimball closed the New Business portion of the agenda and opened the floor to Public Comment. Hearing none, the Chairperson closed the Public Comment period.

Following Public Comment, Mr. Burhop asked if IMSAC could discuss the topic of non-person entities, raised at the start of the meeting. Mr. Burhop called Tim Reiniger, from FutureLaw, LLC, to address IMSAC and address the topic. Mr. Reiniger provided background on the topic of non-person entities relative to current identity management practice, and Mr. Burhop said it would be appropriate to include this topic on the IMSAC work plan. Chairperson Kimball agreed, saying IMSAC needed to remain as forward-thinking as possible.

Mr. Moe requested clarification on the scope IMSAC will apply to its consideration of non-person entities, and he asked staff on what major milestones have been set prior to the Dec. 5 meeting. Dr. Grubbs addressed IMSAC and said the State Identity Credential and Access Management (SICAM) Guidance and Roadmap, published by the National Association of State Chief Information Officers (NASCIO), covered person and non-person entities. He said staff would prepare a presentation focused on non-person entities for the Dec. 5 meeting, which IMSAC could use to set its scope.

Chairperson Kimball reinforced the need for IMSAC members to identify “interested parties,” subject matter experts who may contribute to IMSAC’s efforts, and she directed staff to include as an item on future agendas updates on the status of Guidance Documents transmitted to the Secretary of Technology. The Chairperson confirmed the meeting schedule for 2016-2017, then called for any remaining comments or questions.

Adjournment

Chairperson Kimball, hearing no comment from IMSAC members, closed the discussion period and adjourned the meeting without objection at 3:00 p.m.