

MINUTES
Commonwealth of Virginia
Identity Management Standards Advisory Council (IMSAC)
Dedicated Meeting for Public Comment
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
Jeffrey Zubricki

Staff Present:

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

Members Absent:

Jeremy Grant
Nelson Moe
Michael Watson
Tom Moran

Call to Order

Chairperson Kimball called the meeting to order at 11:00 a.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, Nelson Moe, Michael Watson, and Tom Moran. Quorum was not met. However, Greg Richards from the Office of the Attorney General verified since the meeting was dedicated to IMSAC receiving public comment on guidance documents, and IMSAC would take no formal action during the meeting, the meeting could proceed, pursuant to the *Code of Virginia*.

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>

Dedicated Meeting for Public Comment

Dr. Joseph W. Grubbs, IMSAC Staff Analyst, VITA, presented the two subject guidance documents open for public (verbal) comment:

1. Commonwealth of Virginia Information Technology Resource Management
Guidance Document: Electronic Authentication
2. Commonwealth of Virginia Information Technology Resource management
Guidance Document: Authenticators and Lifecycle Management

Dr. Grubbs indicated the two guidance documents had been posted on the Virginia Regulatory Town Hall, and the General Notice published in the Virginia Register of Regulations, for the 30-day public comment period, as required by § 2.2-437.C, *Code of Virginia* (see attached General Notice). He added the documents had been prepared to align with the National Institute of Standards and Technology (NIST) Special Publication 800-63-3, and the companion documents in the NIST 800-63 series, as directed by IMSAC.

Public Comment

Chairperson Kimball introduced the two guidance documents and opened the floor for public comment.

Timothy Reiniger from FutureLaw, LLC, serving as an adviser of the American Bar Association's Identity Management in Electronic Commerce Committee, addressed IMSAC to provide comment on the subject guidance documents.

Mr. Reiniger noted that the two new guidance documents to be considered by IMSAC during its standing meeting, scheduled for 1:00 p.m., featured the terms "Virtual In-Person Proofing" and "Digital Identity System." He said those terms had not been included in the set of guidance documents currently open for public comment and encouraged IMSAC to incorporate those terms.

Mr. Burhop raised the question to Mr. Reiniger of what was meant by the term "virtual in-person proofing," specifically if this process had the same outcome as traditional, physical in-person proofing but could be conducted through virtual processes and protocols. Mr. Reiniger said that was the case and referenced NIST 800-63A, which added "virtual in-person proofing" to the existing in-person and remote protocols.

Dr. Grubbs clarified the timing of IMSAC's consideration of the first and second sets of guidance documents, as it impacted which terms had been defined in the documents. He said the terms identified by Mr. Reiniger from the first set of guidance documents, which had been revised based on public comment and were set for IMSAC consideration during its standing meeting in the afternoon session, could not be added to the second set of guidance documents, currently under review, until the end of the latter's public comment period. Dr. Grubbs said staff was obligated not to modify guidance documents during public comment period, but now that the period had ended staff would incorporate the terms into the second set of guidance documents.

Chairperson Kimball kept the floor open for public comment for the required time period documented in the agenda, but no additional comment on the guidance documents was provided.

Adjournment

Chairperson Kimball called for remaining public comment and, hearing none, adjourned the meeting without objection at 12:00 p.m. IMSAC remained in the meeting location for a working lunch session, which was also open to the public.



**Commonwealth of Virginia
Identity Management Standards Advisory Council (IMSAC)
Dedicated Meeting for Public Comment
September 12, 2016**

Meeting Purpose: IMSAC is seeking public comment on two proposed guidance documents developed pursuant to § 2.2-437, *Code of Virginia*. This meeting will be dedicated to the receipt of verbal comment, as required by §2.2-437.C. See attached General Notice for the publication of the draft guidance documents in the Virginia Regulatory Town Hall and the Virginia Register of Regulations.

The two guidance documents and their purpose statements:

Commonwealth of Virginia Information Technology Resource Management (ITRM)

Guidance Document: Electronic Authentication

Purpose: The purpose of this document is to establish minimum specifications for electronic authentication within an identity management system.

Draft available online at:

http://www.vita.virginia.gov/uploadedFiles/VITA_Main_Public/About/IMSAC/ITRMGuidanceElectronicAuthenticationDLSAugust8.pdf

Commonwealth of Virginia Information Technology Resource Management (ITRM)

Guidance Document: Authenticators and Lifecycle Management

Purpose: The purpose of this document is to establish minimum specifications for authenticators and lifecycle management within an identity management system. Draft available online at:

http://www.vita.virginia.gov/uploadedFiles/VITA_Main_Public/About/IMSAC/ITRMGuidanceDocumentAuthenticatorsLifecycleManagementDLSAugust8.pdf

General Notice

Proposed IMSAC Guidance Documents on Electronic Authentication and Authenticators & Lifecycle Management

Date Posted: 8/4/2016

Expiration Date: 9/9/2016

Submitted to Registrar for publication: NO

32 Day Comment Forum is underway. Began on 8/8/2016 and will end on 9/9/2016

Notice of action: The Virginia Information Technologies Agency (VITA) is announcing an opportunity for public comment on two proposed guidance documents that were developed by the Identity Management Standards Advisory Council (IMSAC) (Code of Virginia § 2.2-437).

The Identity Management Standards Advisory Council is established to advise the Secretary of Technology on the adoption of identity management standards and the creation of guidance documents pursuant to § 2.2-436.

Regulations affected: There are no regulations affected or proposed by this action.

Purpose of notice: IMSAC is seeking comment on whether the two proposed guidance documents should be submitted as is, or if revisions should be made before the final posting.

The guidance documents have been developed by the Virginia Information Technologies Agency (VITA), acting on behalf of the Secretary of Technology, and at the direction of the Identity Management Standards Advisory Council (IMSAC). IMSAC was created by the General Assembly of the Commonwealth of Virginia in 2015 and advises the Secretary of Technology on the adoption of identity management standards and the creation of guidance documents pursuant to §2.2-436.

The Advisory Council recommends to the Secretary of Technology guidance documents relating to (i) nationally recognized technical and data standards regarding the verification and authentication of identity in digital and online transactions; (ii) the minimum specifications and standards that should be included in an identity trust framework, as defined in §59.1-550, so as to warrant liability protection pursuant to the Electronic Identity Management Act (§59.1-550 et seq.); and (iii) any other related data standards or specifications concerning reliance by third parties on identity credentials, as defined in §59.1-550.

Purpose Statement for Electronic Authentication Guidance Document:

The purpose of this document is to establish minimum specifications for electronic authentication within an identity management system. The document assumes that the identity management system will be supported by a trust framework, compliant with Applicable Law. The minimum specifications have been stated based on language in NIST SP 800-63-3.

The document defines minimum requirements, components, process flows, assurance levels and privacy and security provisions for electronic authentication. The document assumes that specific business, legal and technical requirements for electronic authentication will be established in the trust framework for each distinct identity management system, and that these requirements will be designed based on the Identity Assurance Level (IAL) and Authenticator Assurance Level (AAL) requirements for the system.

The document limits its focus to electronic authentication. Minimum specifications for other components of an identity management system will be defined in separate IMSAC guidance documents in this series, pursuant to §2.2-436 and §2.2-437.

Purpose Statement for Authenticators & Lifecycle Management Guidance Document:

The purpose of this document is to establish minimum specifications for authenticators and lifecycle management within an identity management system. The document assumes that the identity management system will be supported by a trust framework, compliant with Applicable Law.* The minimum specifications have been stated based on language in NIST SP 800-63B.

The document defines minimum requirements, assurance levels, and privacy and security provisions for authenticators and lifecycle management. The document assumes that specific business, legal and technical requirements for authenticators will be established in the trust framework for each distinct identity management system, and that these requirements will be designed based on the Identity Assurance Level (IAL) and Authenticator Assurance Level (AAL) requirements for the system.

The document limits its focus to authenticators and lifecycle management. Minimum specifications for other components of an identity management system will be defined in separate IMSAC guidance documents in this series, pursuant to §2.2-436 and §2.2-437.

The proposed guidance documents are also available with comments and proposed changes by the IMSAC council on the VITA website: <https://www.vita.virginia.gov/About/default.aspx?id=6442474173>

Public comment period: August 8 - September 9, 2016.

Public hearing: A public meeting will be held on September 12, 2016 at 11 a.m. The meeting will be held at the Commonwealth Enterprise Solutions Center, 11751 Meadowville Lane, Chester VA 23836.

Public comment stage: The two guidance documents were developed by the IMSAC and being posted as general notices pursuant to §2.2-437.C. Proposed guidance documents and general opportunity for oral or written submittals as to those guidance documents shall be posted on the Virginia Regulatory Town Hall and published in the Virginia Register of Regulations as a general notice following the processes and procedures set forth in subsection B of § 2.2-4031 of the Virginia Administrative Process Act (§ 2.2-4000 et seq.). The Advisory Council shall allow at least 30 days for the submission of written comments following the posting and publication and shall hold at least one meeting dedicated to the receipt of oral comment no less than 15 days after the posting and publication.

For the purpose of defining the timeframe for public participation and comment, VITA is defining "days" as "calendar days." IMSAC will receive public comment at its September 2016 meeting. For additional information in the definition of "days," please reference page 6 of 15 of VITA's Information Technology Resource Management (ITRM), Policies, Standards and Guidelines (PSGs) Briefs and Supporting Documents found here: https://www.vita.virginia.gov/uploadedFiles/VITA_Main_Public/Library/PSGs/ITRMPSG_Brief_Supportdocs.pdf

IMSAC will hold a meeting dedicated to the receipt of oral comment on September 12, 2016. Meeting details will be posted on the Commonwealth Calendar and the VITA website <https://www.vita.virginia.gov/About/default.aspx?id=6442474171>



Description of proposal: The proposed guidance documents are being posted for review by the general public with an opportunity for public comment.

Federal information: No federal information.

How to comment: IMSAC accepts written comments by email and postal mail. In order to be considered, comments must include the full name, address and telephone number of the person commenting and be received by VITA by the last day of the comment period. All materials received are part of the public record.

To review regulation documents: The proposed guidance documents and any supporting documents are available on the VITA website (<https://www.vita.virginia.gov/About/default.aspx?id=6442474173>). The documents may also be obtained by contacting the VITA representative named below.

Contact Information

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