



**MINUTES**  
**Commonwealth of Virginia**  
**Identity Management Standards Advisory Council (IMSAC)**  
**Dedicated Meeting for Public Comment**  
**Tuesday, Oct. 24, 2017**

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

**ATTENDANCE**

**Members Present:**

Lisa Kimball, Chairperson  
Katie Crepps  
Nelson Moe  
Tom Moran  
Lana Shelley

**Staff Present:**

Joseph W. Grubbs, VITA/IMSAC Staff  
Greg Richards, OAG

**Members Absent:**

Jeremy Grant  
Michael Watson  
Jeffrey Zubricki

**Call to Order**

Chairperson Kimball called the meeting to order at 11:05 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 Mr. Grant, Mr. Watson, and Mr. Zubricki.

*Note: The IMSAC guidance documents may be accessed on the VITA website at:*

<http://www.vita.virginia.gov/About/default.aspx?id=6442475952>

**Dedicated Meeting for Public Comment**

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

Identity Management Standards Advisory Council  
Guidance Document 5. Certification of Identity Trust Framework Operators

Identity Management Standards Advisory Council  
Guidance Document 6. Trustmarks for Digital Identity 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*.

## Public Comment

Chairperson Kimball introduced the two guidance documents and opened the floor for public comment. The Chairperson recognized Mr. Scott Shorter from Kuma, LLC, speaking on behalf of the Kantara Initiative. Mr. Shorter indicated he had submitted a series of comments on the two guidance documents through the Virginia Regulatory Town Hall. Staff accessed Mr. Shorter's comments online and displayed them for discussion:

*Commenter: Scott Shorter, KUMA LLC*

*Kantara Initiative questions and comments*

*Thank you for this opportunity to comment. These comments are derived from a review period involving Kantara Initiative leadership and staff, the chair and vice-chair of the Identity Assurance Working Group and the editor of the Identity Assurance Framework. Comment and questions are grouped by document below.*

*Guidance Document 6[5] - Certification*

*6.1 We suggest that diagram that shows the relationships between the different types of actors identified in the guidance (e.g. CSP, IDP, RP, identity trust framework operator, certification authority) would be very helpful.*

*6.2 We appreciate the idea behind the law - the limitation of liability is an excellent incentive for organizations to operate in accordance with the identified standards. Please clarify whether this limitation of liability extends to certification authorities as well as identity trust framework operators?*

*6.3 What is the process for determining certification authority eligibility or requisite standing? We understand that the list of ten functional requirements are applicable, but what is the process for evaluating and approving certification authorities?*

*6.4 Would the notification process required in item 9 extend to the level of reporting compromised credentials, or is the intention to report on system level breaches?*

*Guidance Document 7[6] - Trustmarks*

*7.1 Is it mandatory to implement trustmarks in order to obtain the liability protections under the law? Or is the purpose of this document to state the minimum standards and specification if trustmarks are utilized?*

*7.2 Who is the intended user of a trustmark for an identity trust framework operator or identity provider? Could the guidance document include use cases demonstrating trustmark verification?*

Chairperson Kimball thanked Mr. Shorter for his comments and asked staff whether the comments would need to be addressed during the meeting. Dr. Grubbs said the comments would be taken under consideration during the next iteration of the draft process, and staff would document its recommendations on how to address the comments during the next Advisory Council meeting. Chairperson Kimball then opened a discussion on the comments by the Advisory Council.

Following the discussion, Dr. Grubbs stated on the record that staff had participated in a meeting with representatives from the Kantara Initiative on October 19, 2017, and recommended for Kantara to submit its comments through the Virginia Regulatory Town Hall.

Dr. Grubbs also read into the record the following comments submitted by Mr. Dave Burhop via email on October 11, 2017:

1. *Who pays for the third party certification authority's services?*
2. *If a certification entity is going to put their stamp of approval on a framework, just wondering if that authority will feel constrained by having to use the Commonwealth's certification criteria?*
3. *Lines 305/306, should "or vice-versa" be added at the end of line 306?*
4. *Do we need a provision for having a trustmark? (Can't remember if a trustmark is required????...something's telling me it is not.)*
5. *Have any certification authorities been contacted about input on this eligibility criteria??? (just curious)*
6. *Line 346....Should "oversee" be replaced with "certify?"*
7. *Should anything about fees associated with Certification Authorities be mentioned?*

Chairperson Kimball accepted Mr. Burhop's comments into the record and directed staff to bring back its recommendations on how to address the comments during the next Advisory Council meeting.

### **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.