

IDENTITY PROOFING, REGISTRATION AND ISSUANCE

Information Technology Laboratory

Computer Security Division

NIST

National Institute of
Standards and Technology

Agenda

- Source Documents
- Identity Proofing Requirements
- Chain-of-trust
- Issuance Requirements
- Special Rule for Pseudonym
- Grace Period

Source Documents

- **Comments about the source documents:**
 - I-9 is a list of employment eligibility form so there is confusion about which combination of source documents must be used to establish identity.
 - The primary and secondary identity documents change over time.
 - Source documents may bear different names.
- **Revised Draft:**
 - FIPS 201-2 provides a complete list of acceptable primary and secondary identity source documents.
 - Primary documents shall be neither expired nor cancelled.
 - If the two identity source documents bear different names, evidence of a formal name change shall be provided.
 - Departments and agencies may choose to accept only a subset of the identity source documents listed in this section.
- **No Change:**
 - Name printed on the PIV Card must be the same as found on the source documents.

Identity Proofing

- Comment: The term "or equivalent" implies that a non-federal investigation could meet the requirement. Suggest rephrasing to emphasize that the investigation level has to be equivalent to, at minimum, a NACI, and it has to be conducted in accordance with federal investigative standards.
- Revised Draft:
 - A credential is issued only after National Agency Check with Written Inquiries (NACI) (or equivalent or higher) or Tier 1 or higher federal background investigation is initiated and the Federal Bureau of Investigation (FBI) National Criminal History Check (NCHC) portion of the background investigation is completed.
- Comment: Section 4.4.1 does not allow for good flow for the reader.
- Revised Draft:
 - Rearranged sections to move biometric data collection requirement in the ID proofing and registration section.

Chain-of-trust

- Comment: The concept of COT is a significant addition to this document. Strongly recommend deleting the “concept of chain of trust” or revising it.
- Revised Draft:
 - Chain-of-trust is now **Optional**.
- Comment: Add a list of the information / artifacts that are included in the ‘chain-of-trust’ record. Also, require the record to be signed.
- Revised Draft:
 - A list of the information / artifacts that are recommended to be included in COT is provided. Decline to require signing COT.
- Comment: How will transferring data between agencies be accomplished?
- Revised Draft:
 - A special publication SP 800-156 following release of FIPS 201-2 will specify the formatting for import and export of a chain-of-trust.

PIV Card Issuance

- Comment: Revise the paragraph regarding cards that contain topographical defects since the requirements are not clear.
- Revised Draft:
 - Revised text to clarify that PIV Cards containing topographical defects (e.g., scratches, poor color, fading, etc) or improperly printed shall be destroyed.
- Comment: The card validity period should be based on the agency policy/guidance.
- Clarification:
 - The validity period can be based on the agency policy / guidance as long as it is not more than six years.
- Comment: Allow any existing PIV Cards to be issued without a 1:1 biometric match of the fingerprints or iris images.
- Revised Draft:
 - If no biometric data is available, the cardholder shall provide the two identity source documents, and an attending operator shall inspect these and compare the cardholder with the facial image retrieved from the enrollment data record and the facial image printed on the new PIV Card.

Special Rule for Pseudonym

- Comment: Clarify the requirements for Pseudonym
- Revised Draft:
 - Issuance of a PIV Card under pseudonym is permitted and should be formally authorized.
 - Must be agency-approved pseudonym.
 - PIV Card Issuance Requirements apply + satisfactory evidence that the pseudonym is authorized by the agency.

Grace Period

- **Comments:**

- Clarify if Identity Proofing and Registration is required.
- Clarify if the issuer must follow issuance or re-issuance requirements.
- Remove the grace period duration of 60 days.
- Clarify why a new NCHC is required.
- Give an example of grace period.

- **Revised Draft:**

- Examples Add: A Federal employee may leave one Federal agency for another Federal agency and come back. Or a contract to a Federal agency may receive a new contract from that agency shortly after the previous contract expired.
- May not need to repeat Identity Proofing and Registration process.
- Verify that PIV Card issuance has been authorized by a proper authority and that the employee's or contractor's background investigation is valid.
- Perform a 1:1 biometric match of the applicant to reconnect to the chain-of-trust.

Questions (?)

Information Technology Laboratory

Computer Security Division

NIST

National Institute of
Standards and Technology