

Comment Template for: NIST SP 800-63-4 Suite (Initial Public Draft)

Comment #	Publication (Base, 63A, 63B, 63C)	Section	Page #	Line #	Comment (Include rationale for comment)	Suggested Change
1	63-Base	5.2 Select Initial Assurance Levels	30	1174-78	See ID.me written comment discussing rationale.	The purpose of these initial assurance levels is to identify baseline digital identity controls and processes, reflected in the requirements and guidelines in the companion volumes of [SP800-63A], [SP800-63B], and [SP800-63C], which will be assessed and tailored to increase IAL requirements as appropriate based on mission need, cybersecurity risk, and other potential impacts to the organization and users of the digital identity systems.
2	63-Base	5.3.4. Document Results	38-39	1464-75	See ID.me written comment discussing rationale.	The Digital Identity Acceptance Statement documents the results of the digital identity risk management process. This includes the Impact Assessment, Initial Assurance Level Selection, and Tailoring process. The statement SHALL include, at a minimum: 1. Initial Impact Assessment Results 2. Initially assessed xAL 3. Tailored xAL and rationale, if tailored xAL differs from initially assessed xAL 4. All compensating controls and their comparability or residual risk associated with compensating controls 5. All supplemental controls Federal agencies SHALL include this information in the system authorization package described in [SP800-37].
3	63A	Section 4.3.3.2	11	578, Bulle	During the pandemic, some Americans who had expired identity documents were unable to get an updated identity document because issuance services were not available. ID.me proposes a grace period of 12 months beyond the expiration date of the identity document, including at a Strong level, as we assess the security risk to be low while the corresponding gains to access and equity to be high, particularly during a crisis.	Add the following language: "A grace period of up to 12 months from expiration is allowable, including for STRONG evidence, subject to risk determination by the CSP"