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## 3 Identity Assurance Framework

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# 5 Additional Requirements for Credential 6 Service Providers: US Federal Privacy 7 Criteria

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16 **Status:** This document is a **Kantara Initiative Report**, approved by the Identity  
17 Assurance WG (see section 3.8 of the Kantara Initiative Operating Procedures)

18 **Abstract:**

19 This Kantara Initiative Additional Requirements for Credential Service Providers  
20 (CSPs) describes criteria that must be met by CSPs that are certified under the  
21 Kantara Identity Assurance Framework (IAF) and desire additional certification for  
22 interoperation with US Federal Agency applications under the Open Government  
23 program.

24

25 **Note:** On 12 July 2011, the Kantara Assurance Review Board unanimously voted to  
26 accept the FICAM Privacy Guidance for Trust Framework Assessors and  
27 Auditors Version 1.0 as an assessment guide applicable to these US Federal Privacy

28 Criteria. That document should be reviewed and considered by Assessors and Auditors  
29 when determining whether an Applicant CSP should be approved against the criteria  
30 described in this document, and during re-assessment audits required for renewal of a  
31 certification. The full FICAM Privacy Guidance document can be found on the Federal  
32 Identity Management home page or by following this link :  
33 [http://www.idmanagement.gov/drilldown.cfm?action=openID\\_openGOV](http://www.idmanagement.gov/drilldown.cfm?action=openID_openGOV)  
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## 59 1 INTRODUCTION

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60 **Kantara Initiative Additional Requirements for Credential Service Providers**  
61 **(CSPs) describes criteria that must be met by CSPs that are certified under the**  
62 **Identity Assurance Framework (IAF) and desire additional certification for**  
63 **interoperation with US Federal Agency applications under the Open Government**  
64 **program.**

65  
66 These additional criteria supplement the Kantara IAF level of assurance requirements found  
67 in the Service Assessment Criteria (SAC). The requirements found in the IAF SAC and  
68 these additional criteria apply only to CSPs, not to Relying Parties (RPs). The Kantara  
69 Initiative Identity Assurance Program, acting in the capacity of a Trust Framework  
70 Provider to the US Federal Government, assumes that all US Agency RP applications will  
71 operate in compliance with all US Federal privacy and identity management policies, laws  
72 and regulations which include privacy protections for citizen personally identifiable information  
73 (PII).

## 74 75 2 Identity Subject Privacy Requirements

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76 The Credential Service Provider must assert and comply with an Identity Subject (Subject)  
77 privacy policy that provides for at least the following:

78  
79 2.1 **Informed Consent** – At the time the Subject initiates registration, the CSP must  
80 provide the Subject a general description of the service and how it operates including  
81 what information, if any, may be released by default to any Relying Party. If the  
82 Subject indicates intent to use the service to gain access to Federal government  
83 applications, the CSP must make available to the Subject a description of what  
84 additional information, if any, may be released to such applications. The Subject must  
85 indicate consent to these provisions before registration can be completed.

86  
87 CSPs should provide a mechanism for Subjects to deny release of individual  
88 attributes to Federal government applications, as specified and specifically  
89 accommodated for in the ICAM approved Authentication Scheme being utilized  
90 by the CSP. It is recognized, and the Subject should be cautioned that such denial  
91 may result in a denial of service by the application unless alternate means of  
92 access are provided to the Subject by the application itself.

93  
94 If Subjects are allowed to establish a continuing approval or denial for release of  
95 certain attributes, for example to avoid being asked anew each time, then there  
96 must be some mechanism by which an Subject can alter or withdraw any of those  
97 established preferences.

98  
99 Note: CSPs are not expected to provide such a mechanism for attribute-level

- 100 opt- out for Subjects when the Identity Subject is engaging with a government  
101 application on behalf of their employer or university. However, the attributes  
102 required by the RP application to complete the transaction must be pre-  
103 arranged by policy agreed to between the CSP and the RP well in advance of  
104 the transaction and must comply with section 2.3 below.  
105
- 106 **2.2 Optional Participation** – Subjects that are members, for example employees,  
107 faculty, or students, of an organization that provides identity services as part of its  
108 business processes should be allowed to opt-out of using that organization’s identity  
109 services to gain access to government applications if such access is not required by  
110 their organizational responsibilities or there is an alternate means of access to the  
111 government application.  
112
- 113 **2.3 Minimalism** – CSP must transmit only those attributes that are explicitly requested  
114 by the Federal RP application or required by the Federal identity assertion profile.  
115
- 116 **2.4 Unique Identity** -- Federal applications that do not require PII must be given a  
117 persistent abstract identifier unique to the individual Subject. When allowed by the  
118 technology, the CSP must create a unique identifier for the Subject that is also unique  
119 to each Federal application.  
120
- 121 **2.5 No Activity Tracking** – CSPs must not disclose information regarding Subject  
122 activities with any Federal application to any other party or use the information for  
123 any purpose other than problem resolution to support proper operation of the identity  
124 service, or as required by law.  
125
- 126 **2.6 Adequate Notice** – At the time an Subject initiates access to a Federal government  
127 application, that application may provide text to be displayed to the Subject before  
128 any PII is provided to the application by the CSP. That text may include  
129 • a general description of the authentication event,  
130 • any transaction(s) with the Federal application,  
131 • the purpose of the transaction(s),  
132 • and a description of any disclosure or transmission of PII that will be requested by  
133 the Federal application.  
134 The Subject should be allowed to cancel the access transaction at this point.  
135
- 136 **2.7 Termination** – In the event a CSP ceases to provide credential services, the CSP must  
137 ensure that any sensitive data including PII continues to be protected and destroyed as  
138 soon as its preservation is no longer required by law or regulation.  
139
- 140 **2.8 Changes in the Service** – If the CSP alters the terms of use of the service, prompt  
141 notice must be provided to all Subjects. Such notice must include a clear delineation of  
142 what has changed and the purpose of such changes.

143

144 **2.9 Dispute Resolution** – CSP’s must have a dispute resolution process for addressing  
145 any dispute resulting from a complaint filed by a Subject utilizing its service who  
146 notifies the CSP regarding a failure to comply with any terms in the CSP Service  
147 Definition required by the SAC, and/or any additional criteria defined in this  
148 document. The CSP must provide evidence to their Kantara Initiative Accredited  
149 Assessor both of the existence of this process and its compliance thereto.

150

151 **2.10 Technology Requirements** – CSP’s must use one or more of the ICAM-  
152 approved identity assertion protocol profiles when engaged in any identity transaction  
153 with government applications. (See <http://www.idmanagement.gov> for the  
154 current list of protocol profiles from which to choose.)

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156 **Acronyms Used in this Document**

157

158           CSP           Credential Service Provider

159           IAF           Identity Assurance Framework

160           ICAM          Identity, Credentialing, and Access Management

161           PII           Personally Identifiable Information

162           RP           Relying Party

163           SAC          Service Assessment Criteria

164           US           United States

165           WG          Working Group

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