July 22, 2011

National Institute of Standards and Technology
c/o Annie Sokol
100 Bureau Drive, Stop 8900
Gaithersburg, MD 20899-8900.

Dear Ms. Sokol,

The National Association of State Chief Information Officers is pleased to submit the following comments to the Notice of Inquiry (NOI) for the Models for Governance Structure for the National Strategy for Trusted Identities in Cyberspace.

NASCIO represents state chief information officers and information technology executives and managers from state governments across the United States. NASCIO and state government information technology leaders are actively engaged in working with the White House, the Federal CIO Council, and its Federal Identity & Credentialing Subcommittee (ICAM) to gain synergy between policies and open standards driven architectures.

NASCIO chartered the Digital Identity Workgroup to develop, coordinate, and mature state-based identity and access strategies consistent with the goals and intended outcomes of the National Strategy for Trusted Identities in Cyberspace. This workgroup is actively collaborating with the ICAM, reviewing the federal ICAM strategies and roadmap documents, and is creating a state-based ICAM vision (SICAM) which is complementary and in synergy, where appropriate, with the federal ICAM efforts and the NSTIC. Within this context and in conjunction with state CIOs and the Digital Identity Working Group, NASCIO has reviewed the NOI and identified comments in the attachment. Please note that NASCIO chose to comment only on a subset of the questions raised in the NOI.

NASCIO believes that state governments are stakeholders in the evolution of an identity ecosystem and hope that our strategic comments are received in this context. We see much value in the recent workshops and appreciate the opportunity to submit feedback to NIST. In developing a Steering Group, NIST is stimulating opportunities for collaboration between all levels of government and key stakeholders.

Should you have any questions regarding NASCIO's comments, please feel free to contact Doug Robinson, NASCIO's executive director, at 859 514-9153 or by email at drobinson@amrms.com.

Sincerely,

Kyle Schafer
NASCIO President
Chief Technology Officer, State of West Virginia

Attachment - State CIO Comments to NIST NOI for Docket No. 110524296-1289-02
CC: Jeremy Grant, Director NSTIC
        Doug Robinson, Executive Director for NASCIO

**NASCIO Response to NOI – Models for Governance Structure for the National
Strategy for Trusted Identities in Cyberspace
Docket No. 110524296-1289-02
7/22/2011**

1. Structure of the Steering Group
Questions:

1.1. Given the Guiding Principles outlined in the Strategy, what should be the structure
of the steering group? What structures can support the technical, policy, legal, and
operational aspects of the Identity Ecosystem without stifling innovation?

Comment: Despite what the final structure of the steering group may be, the
governance structure should include representation from all participating organizations
or jurisdictions. By including all stakeholders and decisions makers it will help to gain
consensus around adoption of the Identity Ecosystem Framework. Key groups that
should be included are industry associations, public-private partnerships, government
leaders, public-public partnerships and citizens groups.

1.9. How should the government be involved in the steering group at steady state? What
are the advantages and disadvantages of different levels of government involvement?

Comment: If states are expected to invest in identity solutions, then there should be an
emphasis on being included in the shared decision body. As described in the Strategy,
individuals interact with their State, local, tribal and territorial governments as much or
more than they do with the Federal Government. If states are able to reach harmony
with federal initiatives there is strong potential for decreasing costs and increasing
services. NASCIO firmly believes that all levels of governments and the private sector
must partner and collaborate on an identity ecosystem.

2. Steering Group Initiation
Questions:

2.2. While the steering group will ultimately be private sector-led regardless of how it is
established, to what extent does government leadership of the group's initial phase
increase or decrease the likelihood of the Strategy's success?

Comment: Under the principles of the Strategy, various levels of government will be the
early adopters of an interoperable Identity Ecosystem Framework. By including
government leadership it will help with streamlining the development of standards, bring
together the collective expertise of the nation and provide seed money for pilot
programs. This will also help with building consensus on policy frameworks that the
Strategy seeks to achieve. The private sector is not positioned to execute public policy
or set legal boundaries; initially the government will need to be involved prior to the
private sector providing identity management solutions.

2.3. How can the government be most effective in accelerating the development and
ultimate success of the Identity Ecosystem?

Comment: For the Identity Ecosystem to gain policy consensus and have an
accelerated adoption process by 2016 it must show value for the participating citizens,

businesses, agencies, etc. By gaining nationwide sponsorship through pilots it will help to demonstrate potential cost savings, enhanced time savings, consolidation of credentials, higher security, and risk mitigation. Not only will the standards need to meet government demands, but the Strategy must show value for the end users to gain widespread adoption. Also, it needs to provide the flexible policy framework for cross boundary collaboration, interoperability, and adoption. This framework will need to be well coordinated system that can address reconciliation of identity management systems that lack the desired interoperability standards that the Strategy seeks.

2.5. What types of arrangements would allow for both an initial government role and, if initially led by the government, a transition to private sector leadership in the steering group? If possible, please give examples of such arrangements and their positive and negative attributes.

Comment: States and other levels of government have been effective in providing the initialing steering, but the private sector will be key to providing the rowing and actually implement the solution sets for the Identity Ecosystem Framework. The Federal government will need to convene, drive and fund the Strategy, but states will be able to implement the goals of the Identity Ecosystem Framework.

3. Representation of Stakeholders in the Group
Questions

3.1. What should the make-up of the steering group look like? What is the best way to engage organizations playing each role in the Identity Ecosystem, including individuals?

Comment: The composition of the steering group should consist of the stakeholders that will be participating in the identity ecosystem. Individuals may be represented through the collective voice of organizations or association.

3.7. How can appropriately broad representation within the steering group be ensured? To what extent and in what ways must the Federal government, as well as State, local, tribal, territorial, and foreign governments be involved at the outset?

Comment: NASCIO finds it inconceivable that states would not be represented within the steering group. States issue the primary breeder documents, such as birth certificates, voter registration, driver licenses and a host of other credentials. The U.S. Department of Transportation most recent information from 2009 points out that states issued over 210 million credentials for just drivers – this does not include the numerous other credentials that are issued by states. This puts the states in a position where they are the nucleus of identity for individuals and the basis for providing services and sharing data across agencies. State identity and credential policies are typically designed to apply to specific use cases. That is, states issue driver's licenses to authorize driving, occupation licenses for different professions, and hunting and fishing licenses for sport, and a host identity credentials for benefit recipients. However, new policies, technology innovations, and current standards development and processes can support a more harmonized approach to identity and credentialing. Formulation of a common identity credential approach that addresses these policies can provide an opportunity for state executives to enact or ratify standards and deploy resources and infrastructure to achieve outcomes that are reusable within the Identity Ecosystem Framework. Citizens will be more likely to voluntarily participate in a new identity credential process if

resources are focused on improving outcomes for citizens, businesses, universities, healthcare providers, and governmental entities at all levels.

4. International
Questions

4.1. How should the structure of the steering group address international perspectives, standards, policies, best practices, etc.?

Comments: Laws such as the REAL ID Act and the Western Hemisphere Travel Initiative and are examples of credentials that are being used with consideration of international perspectives, but they do not include the use of biometrics for stronger two-factor authentications. When issuing a high assurance multi-purpose identity credential there should be consideration of a combination of FIPS 201 and other standards and specifications developed by international standards setting bodies. Examples such as the FRAC credentials, which have been implemented at various levels of government, can provide an interoperable solution for identity credentialing efforts. States continue to issue trusted electronic identity credentials that meet international standards. By creating interoperable credentials that are validated across multiple jurisdictions, this essentially adds to the value and multiple uses for issued credentials. In the United States, mobile device adoption has grown exponentially and the need for digital credentials in the mobile realm should be prioritized. The development of policies and best practices should be in harmony with existing international standards to gain efficiencies.