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

Please submit responses to dig-comments@nist.gov by October 7, 2024.

Organization: Centers for Medicare and Medicaid Services (CMS)

Name of Submitter/POC: Office of Information Technology (OIT) / Information Security and Privacy Group (ISPG)

Email Address of Submitter/POC:

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Equity, and inclusion (DEI). Specifically, individuals in rural areas, low-income households, or those with Additionally, this alternative would serve as a practical backup met	od for users in the event of technological difficulties
19 63A 4.1.7 38 1568 disabilities may face challenges participating in video-based sessions. during video sessions.	
Provide more guidance on how CSPs should handle expired identity documents at IAL2, particularly for applicants from countries where document renewal may be allow or inaccessible. Allowing for more ubstification: Some individuals may face challenges in renewing the	ir official documents, especially in certain jurisdictions or
applicants from countries where occurres where occurrent renewal may oe also or inaccessible. Allowing for more learning to comment expiration (with additional fland controls) would improve accessible without countries. Allowing expired documents will allign fraud active to the countries and the countries. Allowing expired documents will align fraud active to the countries. Allowing expired documents will align fraud active to the countries and the countries are considered and the countries and the countries are considered and the countries are c	
20 63A 2.4 10 649 ignificantly increasing risks	
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Expand the list of acceptable evidence documents at IAL2 to include	
21 63A A.2 80 2729 Incorporate Additional Forms of Identification non-traditional form	identity proofing for underserved populations.
524 For AAL 1 "implementation need not be validated under (FIPS140)" which implies that for AAL2	
and implementation SHAL be validated under [FIPS.140]. However, nowhere in section 2.2.2 does it say implementation SHAL be validated under [FIPS.140]. However, nowhere in section 2.2.2 that implementation SHAL be validated under [FIPS.140]. Implementation FAAL 2 also does not have to be validated under [FIPS.140].	
22 638 2.1.2 & 2.2.2   5 & 7   577 that implementation SHALL be validated under (FIPS 140). implementation for ANL2 also does not have to be validated under (FIPS 140). if ALL2 also does not have to be validated under (FIPS 140). If ALL2 also does not have to be validated under (FIPS 140).	
This sentence states that "accounts at AAL1 are without identity proofing" and therefore recovery for accounts with no identity proofing, where it makes	
"repeated identity proofing is not possible." The implication is that AALI aligns with "No identity saved recovery code, issued recovery code, or recovery contents."	
1766- proofing" in section 1.2 of 63A page 2 line 412 and not with "IAL1" in the same section of 63A (line 416) the recovery method for accounts at IAL1 which did undergo ident	
23 638 4.2.2.1 45 1768 which does require identity proofing. subject to repeated identity proofing.	ut then there should also be a separate section describing
1975 - The phrase "special considerations apply to session management and reauthentication" is stated at	ut then there should also be a separate section describing
24 638 5.2 51 1977 both the beginning and end of the sentence beginning on line 1975. Delete one of the redundant clauses.	ut then there should also be a separate section describing
"Accepting only authentication requests from IP addresses from which the subscribe has been supported in the subscribe and the subscribe a	ut then there should also be a separate section describing
successfully authenticated before" IP spoofing is too easy for this to be a reasonal mitigation to use as throttling. The use of previously, known IP addresses as a part of a risk-based technique for core in the contract of the contract o	ut then there should also be a separate section describing
trrottumg. The use or previously known in adoresses as a part or a risk-based techniques know covers  25 638 3.2.2 29 1225 (bits any way and is more useful.)  Remove this suggestion	ut then there should also be a separate section describing
AS A	ut then there should also be a separate section describing
2.5 Requesting and not think of a scenario where the IAI, AAI info will be same for all transactions. Can we add example	ut then there should also be a separate section describing
26         63C         Processing xALs         7         592 where it will be same?	ut then there should also be a separate section describing
3.15 Bound In the IDP managed bounded authenticator use case, does the IDP have to maintain the Authentication	ut then there should also be a separate section describing
27 63C Authenticators 38 1586 authenticators and FAL 3 bounded authenticators seperately?	ut then there should also be a separate section describing

					This section describes that a RP MAY allow a subscriber to bind multiple subscriber-provided	
		3.15.2 Subscriber	-		authenticators but then on line 1392 it talks about asking the subscriber to present existing bound	
		Provided Bound			authenticator and after it is successful it will immediately prompt for the newly bound authenticator,	
		Authenticator			this reads like replacing existing authenticator with a new one instead of adding another one which in	
28	В	Binding Ceremon	y 40	0 1657-16	support of "allowing multiple authenticators".	