

## AAMVA — CSDII NSTIC Pilot Trust Framework Gap Analysis

**Presentation to the NIST National Program Office** 

## Agenda

- > Purpose
- > Model Trust Frameworks (TFs)
- > Methods & Assumptions
- > Analytic Device
- > Detailed Walk-through
- > Next Steps

### Purpose

- Assess model trust frameworks (TFs) on business, legal, technical and "other" (BLT-O) dimensions using analytic device
- Evaluate how selected model TFs aligned with TF requirements for the CSDII Pilot
- Identify elements and sample agreements from model TFs that may be "reused" for the CSDII Pilot TF

#### Model TFs

- AAMVA DL/ID Security Framework
- eHealth Exchange DURSA
- InCommon TF
- Kantara Initiative TF
- Open Identity Exchange (OIX)/OITF
- CIVICS/IDCubed.org TF

# Methods & Assumptions

- Built from existing research and COV experience to develop analytic device covering BLT-O dimensions
- Framed analysis on elements and agreements in model TFs that could be directly applied for the CSDII Pilot
- Assumed that the CSDII TF would need to be scalable (horizontally & vertically) and support post-pilot implementation

# CSDII Cross Sector Digital Identity Initiative

# Analytic Device

	Trust   Security Frameworks – Key Elements & Provisions for CSDII Pilot Project			
	Business	Legal	Technical	Other
Trust   Security Framework Comparison	<ul> <li>Definitions for "Permitted Purpose"</li> <li>Governing Body &amp; Change Processes</li> <li>Operating Policies &amp; Procedures</li> <li>Security, Privacy &amp; Confidentiality-Business: Consent/Auth.)</li> <li>Suspension &amp; Termination (Voluntary &amp; Involuntary)</li> <li>Data Elements &amp; Data Classification (Attribute Level/PII)</li> <li>Expectations of Performance</li> <li>Use Cases (Exchange &amp; Participant Types)</li> </ul>	<ul> <li>Definition/Identification of "Applicable Law"</li> <li>Legal Agreements (Set) for Exchange Structure (IdPs/RPs/ITSPs)</li> <li>Security, Privacy &amp; Consent Provisions</li> <li>Assignment of Liability &amp; Risk for Participants</li> <li>Representations &amp; Warranties</li> <li>Grant of Authority</li> <li>Dispute Resolution</li> <li>Authorizations for Data Requests by Participant</li> <li>Open Disclosure &amp; Anti-Circumvention</li> <li>Confidential Participant Information</li> <li>Audit, Accountability &amp; Compliance</li> </ul>	<ul> <li>Performance &amp; Service Specifications</li> <li>Security, Privacy &amp; Confidentiality (Technical: Infrastructure/ Architecture)</li> <li>Breach Notification</li> <li>System Access (ID/Authentication)</li> <li>Provisions for Future Use of Data</li> <li>Duty of Response by Participants (IdPs/RPs/ITSPs)</li> <li>Onboarding, Testing &amp; Certification Requirements</li> <li>Handling of Test Data v. Production Data</li> <li>Compliance with External/SDO Standards</li> </ul>	<ul> <li>Openness &amp; Transparency</li> <li>TF Lifecycle Management ("Living Agreement")</li> <li>Support &amp; Capacity Building (IGs)</li> <li>Scalability to Support Array of Participants (Horizontal/Vertical)</li> <li>Glossary of TF Terms/Definitions</li> <li>Modular Approach for TF Elements – IdPs, RPs &amp; ITSPs</li> <li>Law Enforcement (LE) Use Case: Support for Data Sharing</li> <li>Federal Government Use Case: Federal Agency as RP (FICAM)</li> </ul>

# Detailed Walk-through

#### **Summary Points:**

- Model TFs ranged along a continuum from the Descriptive to Prescriptive
- Issues of specificity and applicability at the Descriptive end of the continuum
- Concerns over scalability and legal constraints at the Prescriptive end of the continuum

## Next Steps

- Learn from the gap analysis to develop a detailed outline (core elements and agreements) for the CSDII TF
- Engage InCommon to build from its TF elements and agreements
- Prepare a TF for the CSDII that reflects best practices and meets all requirements

#### For More Information

Joseph W. Grubbs, Ph.D.
Enterprise Information Architect
Commonwealth Data Governance
Virginia Information Technologies Agency
Phone: (804) 416-6171

Email: Joseph.Grubbs@vita.virginia.gov