

Discussions with the Privacy Experts on SSA's Authentication Process

Date	Organization	Background	Recommendations
4/26/2010	Privacy and Information Policy Consultant	The purpose of the meeting was to brief the privacy consultant on SSA's new identity proofing, credentialing, and second-factor authentication proposal and receive his feedback on the proposal or strategy.	Approved – <ul style="list-style-type: none"> • Commended SSA's efforts • Offered recommendations • Suggested names/organizations for further Privacy related briefings
4/27/2010	Vice President of the Center for Democracy & Technology (CDT)	The purpose of the meeting was to brief CDT on SSA's new identity proofing, credentialing, and second-factor authentication proposal and to receive feedback and recommendations.	Approved – <ul style="list-style-type: none"> • Commended SSA's efforts • Offered recommendations: <ul style="list-style-type: none"> ➢ Do not use Mother's Maiden Name ➢ Every user should get an OOW question at enrollment time, and maybe even at every subsequent logon ➢ Implement automated removal of block ➢ Aggressively handle fraudulent attacks • Suggested names/organizations for further Privacy related briefings • Suggested organizations for future benchmarking activity

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5/10/2010	Editor/Publisher of Privacy Times	<p>Privacy Times is a newsletter covering privacy and Freedom of Information Law and policy.</p> <p>The purpose of the meeting was to brief Privacy Times on SSA's new identity proofing, credentialing, and second-factor authentication proposal for the public and to receive feedback and recommendations.</p>	<p>Approved –</p> <ul style="list-style-type: none"> • Stressed the importance of user education regarding use of Experian for identity verification only • Cited that Experian offers the most dynamic database of the leading credit bureaus • Enforced SSA's right to audit Experian and tweak the process as needed • Recommended consultants for further privacy consultation activity
5/10/2010	Professor of Law & Director, Information Privacy Programs, Berkeley University	<p>The purpose of the meeting was to brief the professor on SSA's new identity proofing, credentialing, and second-factor authentication proposal for the public and to receive feedback and recommendations.</p>	<p>Approved –</p> <ul style="list-style-type: none"> • Commended SSA's efforts • Reactions: <ul style="list-style-type: none"> ➤ Our business model is comprehensive and secure. ➤ He sees no problems with going to a private sector database to help with identification and authentication. ➤ Our design deals with any sensitivity this model might provoke. • Cautioned SSA about "over-engineering" (i.e. making our process so difficult that the public will not use it)

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5/11/2010	Assistant Professor, School of Information, UC Berkeley; Director, Berkeley Center for Law and Technology	The purpose of the meeting was to brief the Assistant Professor on SSA's new identity proofing, credentialing, and second-factor authentication proposal for the public and to receive feedback and recommendations.	<p>Approved –</p> <ul style="list-style-type: none"> • Commended SSA's efforts • Reactions: <ul style="list-style-type: none"> ➤ The risk of identity theft to the user is high (i.e. what malware exists on the user's machine and fraudulent sites). ➤ Recommended we look into the Team for Research in Ubiquitous Secure Technology, for ways to identify secure sites. • SSA will update its ROME Executive Summary to include user security practices and risks. • Clarify that authentication should be defined as "identity authentication". • Clarify that SSA program determinations will not be affected by Experian's identity risk score.
5/17/2010	Director, Consumer Program, U.S. PIRG	The purpose of the meeting was to brief the Director of Consumer Programs, U.S. PIRG. U.S. PIRG, the federation of state Public Interest Research Groups, on SSA's new identity proofing, credentialing, and second-factor authentication proposal for the public, and to receive feedback and recommendations.	<p>Approved –</p> <ul style="list-style-type: none"> • Commended SSA's efforts • Recommended that SSA remain vigilant in monitoring and auditing Experian's performance

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5/27/2010	Privacy Expert, Founder and Director of the Privacy Rights Clearinghouse	The purpose of the meeting was to brief the founder and director of the Privacy Rights Clearinghouse on SSA's new identity proofing, credentialing, and second-factor authentication proposal for the public and to receive feedback and recommendations.	<p>Approved –</p> <ul style="list-style-type: none"> • Commended SSA's efforts • Reactions: <ul style="list-style-type: none"> ➤ SSA has a good process and that all of our bases are covered ➤ The process is thorough, well thought out, cautious, secure, and well vetted ➤ The new process will serve identity theft victims well ➤ Commended us for developing a way to handle domestic abuse victims.
5/28/2010	Members of the Privacy Coalition	The purpose of the meeting was to brief the Privacy Coalition members on SSA's new identity proofing, credentialing, and second-factor authentication proposal for the public and to receive feedback and recommendations.	<p>Approved –</p> <ul style="list-style-type: none"> • Commended SSA's efforts • Reactions: <ul style="list-style-type: none"> ➤ SSA should look into TSA's experience on lessons learned regarding accuracy of external data sources ➤ Recommended exploring options such as the use of a cell phone/biometric device ➤ Agreement that the members of the Privacy Coalition would be able to follow-up with SSA and pose additional questions via correspondence between EPIC and SSA

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5/28/2010	Co-chair and Director of the Future of Privacy Forum	The Future of Privacy Forum seeks to advance responsible data practices. The purpose of the meeting was to brief the Director on SSA's new identity proofing, credentialing, and second-factor authentication proposal for the public and to receive feedback and recommendations.	<p>Approved –</p> <ul style="list-style-type: none"> • Commended SSA's efforts • Reactions: <ul style="list-style-type: none"> ➤ Suggested that SSA consider the implications of issuing a single ID and potentially sharing that credential with other agencies or organizations. ➤
6/16/2010	Office of Management and Budget / Office of E-Government and Information Technology; & National Institute of Standards and Technology	The purpose of this meeting was to brief these agencies on SSA's new identity proofing, credentialing, and second-factor authentication proposal for the public to receive feedback and recommendations.	<p>Approved –</p> <ul style="list-style-type: none"> • Received very positive reactions and favorable feedback • Said this model should be the standard for other federal agencies • Physical mailing via USPS for a Level 3 credential is essential

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7/15/2010	National Network to End Domestic Violence (NNEDV) Director of the Safety Net Project Senior Attorney at Greater Boston Legal Services	The purpose of the meeting was to brief these experts on SSA's proposed credential issuance, management, and authentication system, Registration of Most Everyone (ROME), and to solicit feedback, specifically as it relates to the unique perspective and needs of the domestic violence survivors population.	Approved – <ul style="list-style-type: none"> • Commended SSA's efforts • Reactions: <ul style="list-style-type: none"> ➤ The NNEDV and SSA will continue to collaborate on spreading educational information through local and national training programs ➤ Survivors of domestic violence must enroll for a ROME User ID in person. ➤ SSA acknowledged the difficulty in balancing security with ease of use; ➤ Participants agreed that the process in place for ROME is appropriate for most survivors of domestic violence.

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7/20/2010	Identity Theft Resource Center	<p>The purpose of this meeting was to brief the Executive Director and founder of the Identity Theft Resource Center on SSA's proposed identity proofing, credential issuance and management, and authentication process and to solicit feedback, specifically as it relates to the unique perspective and needs of the victims of identity theft.</p>	<p>Approved –</p> <ul style="list-style-type: none"> • Commended SSA's efforts • Reactions: <ul style="list-style-type: none"> ➤ Use a layered structure to store user names, passwords, and reset questions. (i.e. don't put everything in one database) ➤ Provide 2 levels of instructions for users based on their computer experience. ➤ Tell users, up front, the kinds of personal information (PII) SSA will never ask them for, or the kinds of activities SSA will never engage in with their customers. <p>Note: SSA will allow OIG personnel to access the ROME Customer Support Application so they can block access to an individual's electronic personal information as soon as they are notified of an identity theft.</p>
9/2/2010	Office of Management and Budget / Office of Information & Regulatory Affairs	<p>Frank Baitman, OOG staff, and OPLM staff met with OMB representatives to brief them on the upcoming clearance for SSA's new identity proofing, credentialing, and second-factor authentication process.</p>	<ul style="list-style-type: none"> • OMB appreciated the early notification and promised to push this clearance request, and any subsequent non-substantive changes, through the review process as quickly as possible. • OMB alerted SSA to new guidance on the use of "cookies."

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12/21/2010	Office of Management and Budget / Authentication Desk Officer	OOG and OPLM met with OMB's Authentication Desk Officer to provide a "heads up" on the upcoming clearance package for SSA's new public credentialing process and to solicit feedback on any additional information we could submit that would be helpful.	<p>The Desk Officer requested that we add the following items to the OMB Clearance package:</p> <ul style="list-style-type: none"> • A full description of the model; • An explanation as to how this model complies with NIST & OMB guidance; • A list of the Privacy laws; and, • A list of the Privacy Experts we consulted with. <p>We can attach these in a separate Addendum.</p>
3/4/2011	Vivek Kundra, National CIO, White House	Alan Lane briefed the National CIO on SSA's new identity proofing, credentialing, and second-factor authentication process.	<p>Approved –</p> <ul style="list-style-type: none"> • Received a favorable reaction • Wanted to know when SSA will federate • Expressed an interest in putting the Social Security Statement online.

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4/6/2011	Aneesh Chopra, Chief Technology Officer of the U.S.	Alan Lane met with the Chief Technology Officer of the U.S. this afternoon to discuss authentication efforts at SSA.	Approved – <ul style="list-style-type: none">• Wants SSA to look into a USPS product that verifies address• Stressed the importance of performing live testing for ROME