

## 1 Overview

AINS is pleased to provide a formal comment to the U.S. Department of the Interior (DOI) notice in the Federal Register re: Office of Management and Budget (OMB) Control Number 1093-NEW.

We understand that DOI is in the process of modernizing the Privacy Act request process by achieving compliance with OMB Memorandum M-21-04 and implementing the requirements within the Creating Advanced Streamlined Electronic Services for Constituents Act of 2019 (CASES Act).

AINS is publicly commenting on this Federal Register notice to provide DOI and OMB information with best practices and technology solutions to streamline the Privacy Act request process and guarantee compliance with OMB M-21-04. Specifically, the intent of our comment is to communicate that digitization and approval of DI-4016 and DI-4017 is only part of a larger need to modernize the Privacy Act request process at DOI, and the strategies and systems described in this comment will not only reduce burden to the public but also provide DOI with enhanced processing capability.

AINS offers FOIAXpress, a commercial off-the-shelf (COTS) digital Freedom of Information Act (FOIA) and Privacy Act (PA) request management solution. FOIAXpress is used across most U.S. federal agencies and helps them ensure compliance with all open government and privacy laws and regulations and better facilitate transparency and access between government and its constituents. Integration to digital proof of identity providers such as **Login.gov** and **ID.me** allows agency FOIA/Privacy teams to validate the identity of requesters and centralize the Privacy Act request process in one public-facing portal.

ID.me currently performs these services elsewhere in the federal government in support of M-21-04, using an Identity Assurance Level (IAL2) / Authentication Assurance Level (AAL2) security policy as described in National Institute of Standards and Technology (NIST) Special Publication (SP) 800-63-3. Their pre-verified network of over 30 million NIST credential-holders means that agencies can allow access with a high confidence that someone is who they say they are and users can have a seamless customer experience by gaining access via a simple, previously-established multifactor authentication (MFA). ID.me is also the only identity provider independently certified against NIST SP 800-63-3 for IAL2/AAL2 with a Supervised-Remote (video chat) proofing capability. More information on FOIAXpress and the Public Access Link (PAL) with digital proof of identity technology is provided below.

Our comments on the four areas identified by DOI in the notice are provided in Section 2 of this response. We appreciate the opportunity to comment on this notice and welcome any questions or requests for a demonstration.