



ID.me Public Comment on USDA eAuthentication

July 20, 2023

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RE: *ICR REFERENCE 202305-0503-002, USDA eAuthentication Service Customer Registration*

ID.me is pleased to respond to USDA's request for public comment OMB control number 0503-0014, ICR reference number 202305-0503-002, *USDA eAuthentication Service Customer Registration*.

I. EXECUTIVE SUMMARY

ID.me is an American-owned, Veteran-run company that provides secure login, authentication, identity proofing, and community verification services to 110M+ users, 14 federal agencies, over 30 state agencies, and more than 600 private sector companies.

The COVID-19 pandemic accelerated the pace of adoption of digital services. McKinsey and Company reported this transition was particularly acute for the public sector. With in-person interactions curtailed, governments and private enterprises scrambled to digitize their processes and services. McKinsey estimates the share of customer interactions on digital platforms jumped 41% to 65% through July 2020. They estimated the increase to be even greater for public sector services, reaching 90% by April 2021.¹ At the same time, fraudsters have become more aggressive about exploiting stolen personal data to make fraudulent claims against government benefits. Programs such as unemployment insurance, student loans, small business loans, and food benefits in particular have seen fraud attacks escalate. FTC reported a 2,920% increase in identity theft linked to government benefits, and Jeremy Sheridan, who directs the office of investigations at the Secret Service, called it "the largest fraud scheme that I've ever encountered."

This has forced government agencies and businesses to rethink their approach to digital identity and authentication. This is especially true for agencies responsible for direct disbursement of benefits to legitimate consumers in need of assistance, such as USDA. In ID.me's experience, the best way to increase quality and utility of information collected while also minimizing burden on end-users is to (1) offer modern, portable high-assurance credentials that meet government standards and (2) offer users choice regarding with whom and how they verify their identity.

The comments included below are provided based on ID.me's experience:

- Supporting verification and authentication needs of 14 federal agencies and 30+ state agencies

¹Hajro, Neira, et al. *What's next for Digital Consumers*. McKinsey & Company, McKinsey & Company, 16 Aug. 2021, www.mckinsey.com/business-functions/mckinsey-digital/our-insights/whats-next-for-digital-consumers.

- Verifying the identity of over 44 million users to the guidelines set forth by the National Institute of Standards and Technology (NIST) in its Special Publication (SP) 800-63 series
- Authenticating each of those 44M+ users one or more times using a broad range of authentication methods, including phishing resistant and FIPS 140-2 conformant methods consistent with the federal Zero Trust Strategy
- Helping stop over \$273 *billion* in improper unemployment payments, in which 7 of the 30+ state agencies we support have publicly recognized ID.me's role
- Helping double access rates to online services at large consumer-facing government agencies, including Social Security and the Internal Revenue Service^{2,3}
- Supporting agencies as they roll out new benefits programs such as the Advanced Childcare Tax Credit (ACTC)
- Supporting agencies as they deprecate antiquated legacy logins and verification pathways powered by credit bureaus and data brokers
- Helping agencies adhere to regulatory guidance set forth in
 - OMB M-19-17, which calls for adherence to NIST digital identity guidelines
 - OMB M-22-09, which calls for agencies to use strong "phishing-resistant" MFA throughout their enterprise
 - Joint Explanatory Statement attached to the Consolidated Appropriations Act of 2023, in which Congress directed "government-wide policy that leverages portable identity **and multiple credential service providers** (CSPs) independently certified against the requisite National Institute of Standards and Technology guidelines for the highest possible pass rates, fraud prevention, and cost reduction."⁴

Based on these experiences, there are two actions USDA can consider to improve quality of the information collected and minimize the burden on the individuals: (1) **conform to NIST digital identity guidelines** and (2) **offer multiple Credential Service Provider (CSP) options**.

Veteran Affairs, Social Security Administration, Health and Human Services, and the Internal Revenue Service have all taken this approach and experienced the following benefits:

- increased access rates;
- better customer experience;
- redundancy for periods of unavailability;
- better service levels and security;
- increased awareness of benefits; and
- consistency with a Fiscal Year 2023 Appropriations Directive, Obama/Biden Administration NSTIC strategy, and OMB M-19-17.

ID.me submits this public comment in an effort to provide USDA useful information about:

- how to enhance quality, utility, and clarity of information collected as a part of registration, verification, and electronic authentication processes at government agencies;
- how to reduce the burden on end-users; and
- how to achieve both high security and high access at the same time, without compromise.

² <https://fcw.com/digital-government/2022/05/irs-leader-explains-why-irs-went-idme/366516/>

³ <https://www.ssa.gov/budget/assets/materials/2024/FY24-JEAC.pdf>

⁴ See "Joint Explanatory Statement Regarding the Consolidated Appropriations Act," 20 Dec. 2022.

II. INVITED COMMENTS

1. Whether the collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility:

The collection of information is necessary for the proper performance of USDA's functions, particularly in terms of verification and authentication related to disbursement of public benefits. Verifying the collected information is accurate, belongs to a legitimate individual, and is owned by the person claiming ownership of that information can help USDA ensure that the end users they interact with are in fact who they say they are.

NIST provides detailed guidelines on information collection and verification in its Special Publication 800-63-3.⁵ As described in NIST SP 800-63A, an agency should collect and verify **“the minimum attributes necessary to accomplish identity proofing.”** To help agencies determine what information is necessary and what level of verification is appropriate, NIST provides a comprehensive blueprint for evaluating risk and determining the corresponding appropriate identity assurance level (IAL) – essentially matching the level of security to the level of risk associated with a service. NIST guidance has been instrumental in aiding agencies to enhance their performance and efficiency in this space.

In our experience supporting federal and state governments, agencies that disburse entitlement benefits typically adopt a NIST Identity Assurance Level 2 (IAL2) policy. This is based on the level of risk of the transaction and potential for fraudsters to try to exploit the benefit program. Some ask users to verify up-front. Others bring users into a portal at a lower level of assurance and then step users up to IAL2 when they initiate an application. By adhering to IAL2 requirements, agencies are able to effectively prevent fraud and verify users' identities, thereby drastically reducing fraudulent access and false claims. **ID.me believes that agencies can have this high level of security AND equitable access without compromise**, if USDA adopts the right approach to information collection and identity verification. This includes offering NIST-conformant solutions that combine best-in-breed algorithms with human fallbacks, offer users multiple pathways by which to verify (online self-serve, video chat, and in-person), offer a pathway that does not leverage biometrics, and include strong fraud controls.

When compared with legacy question-based verification processes (e.g. Knowledge Based Verification), the implementation of NIST's IAL2 standard has demonstrated significant success in preventing remote and scalable fraud, particularly for public agencies charged with disbursement of financial benefits. For example, the **Small Business Administration announced it would transition to the NIST IAL2 policy for its Surety Bond Guarantee program**. At the state level, implementation of **NIST guidelines to protect unemployment insurance led to seven publicly crediting ID.me with helping avoid a total of \$273 Billion dollars in improper payments.**⁶ In contrast, Colorado's state unemployment office

⁵ The NIST 800-63-3 guidelines are divided into several sections: 800-63A for enrollment and identity proofing, 800-63B for authentication and lifecycle management, and 800-63C for federation and assertions. Each section contributes to a holistic approach to digital identity management.

⁶ See <https://lasvegastribune.net/2022/12/23/director-elisa-cafferata-announces-resignation-from-the-department-of-employment-training-and-rehabilitation-dettr/>; <https://findbiometrics.com/california-claims-id-me-stopped-125-billion-worth-employment-fraud-062403/>; <https://www.governing.com/security/florida-continues-to-require-identity-verification-with-id-me/>; <https://newjerseymonitor.com/briefs/n-j-labor-department-has-stopped-5-4b-in-fraud-claims/>; <https://state.techmagazine.com/article/2021/10/nascio-2021-georgia-sought-identity-verification-solution-stop-fraud/>; <https://apnews.com/article/coronavirus-pandemic-business-health-arizona-1f9f1361199f19f7cdc4279a546a37b1>.

recently stated approximately 1/3 of its unemployment benefit claimants are fraudulent users after it replaced a NIST IAL2 solution with a non-IAL2 standard for verification.⁷

These real-world examples highlight the effectiveness of implementing NIST's guidelines and underscores the utility of verifying and authenticating users. At ID.me, we believe agencies can have both security and equitable access simultaneously, all while adhering to NIST guidelines. Evidence to support this belief includes:

- Former IRS Commissioner Rettig testified before the Senate Appropriations committee on May 3, 2022, he stated **ID.me nearly doubled IRS's pass rates.**⁸ The Washington Post later reported this doubling of pass rates included "low income earners and minorities."⁹
- Similarly, the **Social Security Administration's (SSA)** Budget Request for FY23, SSA noted it "Improved Login.gov and ID.me federation and introduced improvements to our identity verification process. **As a result, we increased our online services registration pass rate, from roughly 40 percent to nearly 80 percent as of the end of FY 2021.**"⁹

The key to achieving both security and access lies in moving away from legacy methods like knowledge-based authentication and verification (KBA, KBV) to adopt NIST identity verification and authentication guidelines. Highlighting the ineffectiveness of question-based verification, Pindrop's 2020 Voice Intelligence & Security Report unveiled a shocking reality: "Ninety-two percent of fraudsters passed KBA questions based on a national contact center case study, while genuine customers only passed KBA's forty-six percent of the time." To overcome the shortcomings of legacy methods like KBA, ID.me advocates for a four-pronged strategy:

1. **Adhere to NIST guidelines:** promoting security by considering IAL2 verification for public benefits;¹⁰
2. **Combine leading-edge algorithms with human-powered relief valves:** providing a solution where an algorithm can say "Yes" but only a human can say "No" during identity verification;
3. **Provide omnichannel solutions:** enabling more ways for users to be successful: unsupervised, supervised, and in-person; and
4. **Harness portability:** leveraging existing credentials improves customer experience and reduces cost for USDA.

The collection of information can enable USDA to have both higher security and better end-user experience. The combination of NIST guidelines and innovative strategies such as those described above can enable USDA to balance security and access, maximizing the utility of the collected information.

⁷ <https://www.9news.com/article/news/local/identity-thieves-colorado-unemployment-claims/73-81e2892b-ab5e-4ac7-ad2a-f09de3417078>; https://www.youtube.com/watch?v=_iB4ou1xuUQ

⁸ <https://www.c-span.org/video/?519355-1/2022-tax-filing-season-irs-fiscal-year-2023-budget-request>

⁹ <https://www.ssa.gov/budget/assets/materials/2024/FY24-JEAC.pdf>

¹⁰ ID.me was the first CSP certified against NIST 800-63-3 IAL2 and AAL2 by the Kantara Initiative. ID.me's Unsupervised Remote (self-serve), Supervised Remote (video chat), and in-person (public kiosk) solutions are certified against Kantara for NIST IAL2.

2. The accuracy of the agency's estimate of burden including the validity of the methodology and assumptions used:

In ID.me's experience, USDA can leverage three capabilities to better understand the estimate of burden and the end-user experience: KPI monitoring, analyzing performance across demographic groups, and funnel reporting. These capabilities can support how USDA determines its estimate of burden and also understand how that burden might vary across demographic groups and locations. ID.me can work with USDA to better understand methodology and assumptions used in estimation of burden and inform any changes by applying the following:

1. **KPI monitoring.** ID.me tracks key metrics that help us understand the user experience throughout our funnel. These include but are not limited to **overall pass rates, pass rates for each step, pre-verified rates (i.e. already completed verification at another agency), time to verify, abandonment, unsuccessful verifications, and fraud.** ID.me currently uses these KPIs to inform product improvements and reporting to agencies that want to understand the experience of their end-users. We could leverage these KPIs to help USDA test its methodology and assumptions used in its current estimate of burden. As an example, we know that in Q1 of 2023, 7.1 million users verified their identity to IAL2. For those users, 88% verified with no wait time. Ninety-five percent either had no wait time or waited less than five minutes.
2. **Equity Analytics Engine.** ID.me has built an "Equity Analytics Engine" which **agencies can use to examine how pass rates vary across demographics and estimate what user experience will be like for benefit programs.** This engine combines aggregated user verification attempt data with American Communities Survey demographic data to inform performance assessments. It can provide USDA insights beyond estimation of burden; it can show how that burden varies across beneficiary groups. Example insights include:
 - a. How pass rates for IAL2 steps vary for different races and ethnicities
 - b. How pass rates for IAL2 steps vary for different age groups
 - c. How pass rates for IAL2 steps vary by median income
 - d. How pass rates for IAL2 steps vary by zip codes
 - e. How much benefit is gained from alternative pathways such as Video Chat
 - f. What the expected verification performance will be for combinations of demographics and locations that USDA is targeting for a new benefit program

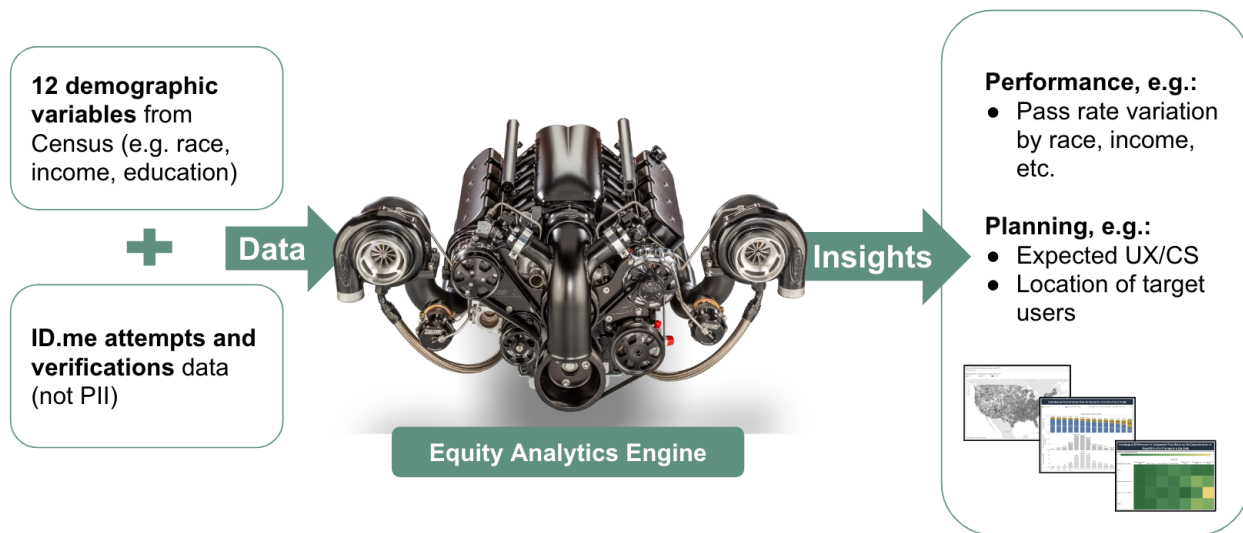


Figure 1: ID.me Equity Analytics Engine

3. **Verification reporting dashboard.** ID.me also provides agencies with a **reporting dashboard** that USDA analysts could use to study and analyze the performance of their integration, including success rates and how users progress through the verification steps. These metrics can be studied to refine methodology and assumptions of USDA's estimate of burden. The dashboard is available via web portal and would enable USDA to **visualize its verification funnel, drill down into specific steps, query where specific users are in the verification process, and receive scheduled reports at a customizable cadence.** This tool gives USDA secure access and on-demand reports of key metrics. The dashboard provides high level insights at the aggregate level, as well as visibility at the individual level, in order to better understand and analyze the effectiveness of these services to users.

Additionally, **if USDA wanted to update or refine its estimate of burden, it could do so by scheduling recurring and routine data sends.** Specifically, ID.me provides for the export of attribute bundles and aggregated data for reporting and analytics purposes using open standards and federated protocols. We support SAML 2.0, OAuth 2.0, OpenID Connect, and RESTful APIs. ID.me will export the data tied to all users who verify successfully. Aggregated reports are available in presentation-ready Excel and CSV formats.

Beyond the burden on the end users, USDA should also consider analyzing its workload and cost-to-serve associated with supporting end users. A CSP like ID.me that offers higher access rates and 24/7 end-user support can reduce USDA's call center costs and other operating costs. ID.me understands that a high share of agency call center demand can be related to identity verification, authentication, and account management activities. ID.me services include 24/7 end-user support via our highly-trained, domestically-based agents accessible via one of 5 contact channels, including live chat. This means that agencies can focus their resources on resolving more complex claims-related issues. An even larger impact digital identity can have on USDA call center throughput and efficiency is driven by higher access rates. Higher verification and authentication access rates lead to more users in digital channels, fewer users engaging more-expensive call centers and in-person locations, and meaningful efficiency gains for agencies.

ILLUSTRATIVE

Implementation of Digital Identity drives productivity and efficiency gains – likely on the order of \$100's of millions

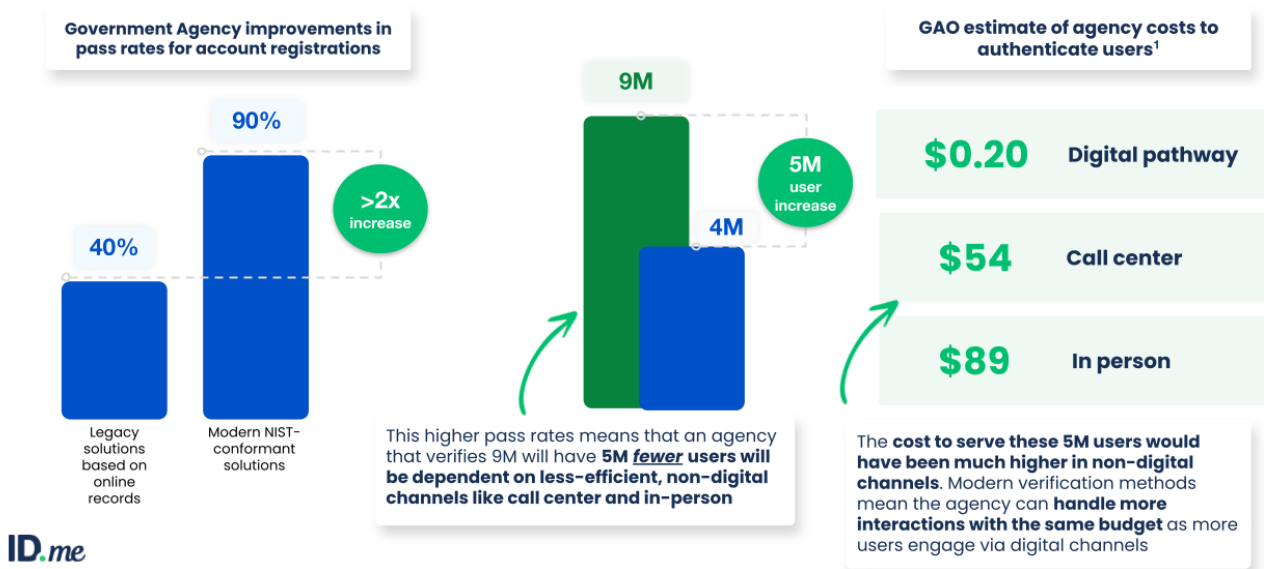


Figure 2: Illustrative calculation of efficiency gains when individuals verify in a digital channel and avoid using the agency's contact centers

A 2018 Government Accountability Office study¹¹ found that a federal agency paid \$54 per user interaction through the call center and \$89 per user interaction via in-person channels. That same agency paid less than \$1 per interaction via the digital channel. Figure 2 shows an illustrative calculation of the size of the impact that is possible when a large agency doubles access to digital channels (as ID.me has helped multiple agencies do). Even if you assume some efficiencies have been realized since GAO completed its analysis, the benefits for an agency that supports 10 million consumers are potentially on the order of \$10's of millions.

3. Ways to enhance the quality, utility and clarity of the information to be collected;

There are four actions USDA can take to enhance the quality, utility, and clarity of the information USDA collects has a crucial role to play in improving the lives of citizens through data.

1. **Adhere to the National Institute of Standards and Technology's (NIST) guidelines;**
2. **Combine top-tier algorithms with human intervention;**
3. **Offer omnichannel solutions, to promote equity and access for all users; and**
4. **Ensure portability to minimize friction (and burden) for users.**

One of the most reliable methods for USDA to ensure high-quality, clear data is to **adhere to the standards and guidelines provided by NIST**. Specifically, validating and verifying data in accordance with the NIST 800-63A guidelines. For example, to meet IAL2, NIST calls for validation of claimed data via authoritative data sources. It also calls for biometric or physical comparison of the individual claiming ownership of an identity to the strongest piece of evidence provided, *i.e.*, government issued photo ID. Completing both validation and verification ensures that the information provided to agencies

¹¹ <https://www.gao.gov/assets/gao-18-418.pdf>

is accurate, is associated with a real person, and belongs to the person making a claim to the information at the time.

USDA can increase the utility of its collected information by increasing the number of users that it can verify and authenticate via remote channels. Maximizing coverage of the population cannot be accomplished via algorithms alone. **Forty-five million consumers in the US¹² are credit “invisible”** or have unscorable, insufficient, or outdated credit records. These users **struggle to verify using these legacy methods**. This **disproportionately impacts less affluent people and minorities** (Black and Latino households represent 64% of the country’s unbanked households¹³).

To overcome this challenge, USDA would benefit significantly from a model **combining best-in-class algorithms with human fallbacks**. This hybrid approach has been shown to facilitate increased access rates for users, thereby enhancing utility for both USDA and users. For example, if a user is unable to complete the algorithm selfie comparison, rather than “fail” the users, ID.me has a “human in the loop” review the uploaded image in real-time, compare the image to the uploaded photo ID, and make a determination if it is the same individual. If the reviewer cannot make a determination, or believes it is not the same individual, the user is routed to complete verification with a trained agent via our video chat pathway. Moreover, if a user is unable to complete verification at any point in the process, ID.me sends the user a follow-up email with a link to submit a customer support ticket so our agents can assist them.

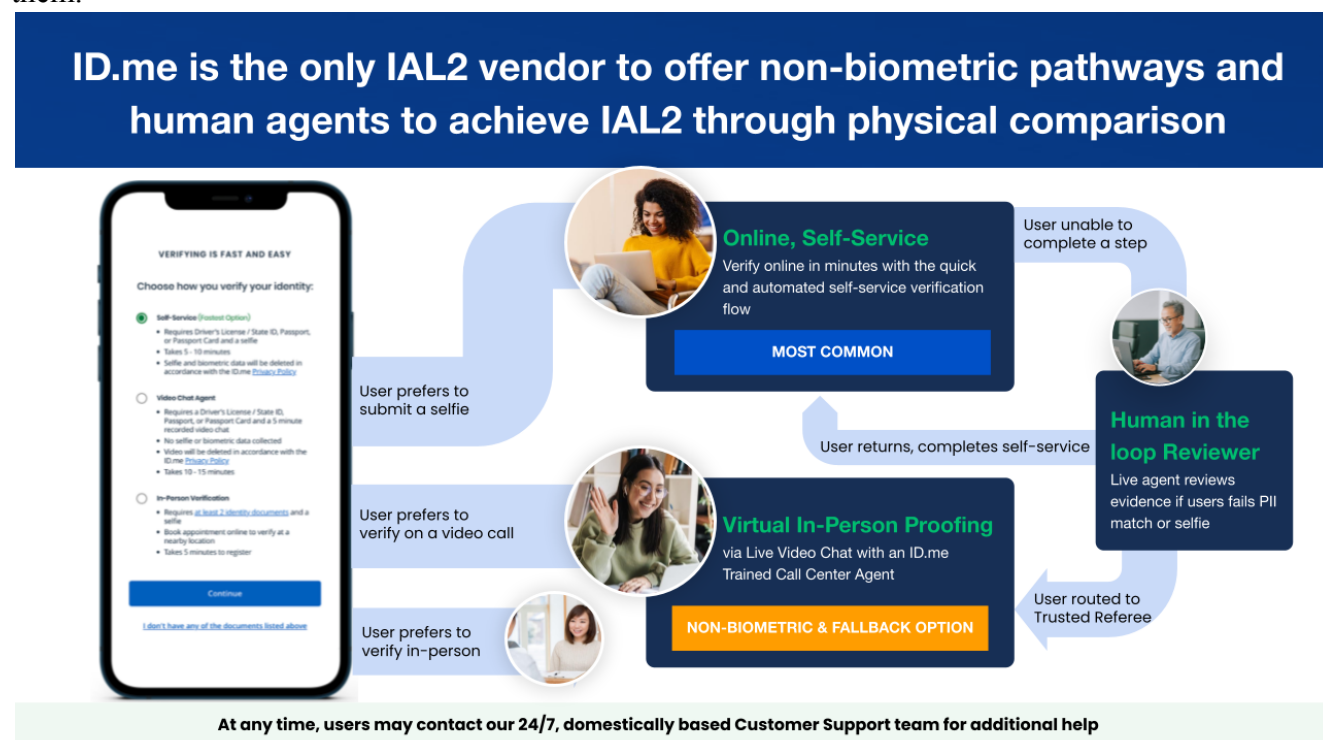


Figure 3: ID.me offers multiple layers of human agents to mitigate any potential bias due to structural barriers, primarily data broker shortcomings but also biometrics, and offers non-biometric IAL2 paths.

¹² <https://www.consumerfinance.gov/about-us/newsroom/cfpb-explores-impact-alternative-data-credit-access-consumers-who-are-credit-invisible/>

¹³ <https://www.bcg.com/publications/2021/unbanked-and-underbanked-households-breaking-down-the-myths-towards-racial-equity-in-banking#:~:text=Making%20up%20just%2032%25%20of,banks%20to%20meet%20the%20challenge>

In addition, we believe that ID.me is the only verification solution currently offering four layers of human assistance to help users attain IAL2:

- **Human In The Loop:** Real-time review of documents and selfies so agents can override;
- **Video Chat Verification:** Trained agents can fully verify an individual end-to-end;
- **In person verification:** Verification with an agent at one of 700 retail locations; and
- **Customer Support:** 24x7 help desk offering live chat, email, and specialized assistance.

These layers of human assistance are consistent with the principles set forth in the White House Office of Science and Technology Policy “Blueprint for an AI Bill of Rights,” which calls for “human alternatives, consideration, and fallback.” ID.me also offers agencies an IAL2 configuration enabling users to go directly to video chat verification if they do not want to go through biometric facial recognition (known as “Direct to Trusted Referee” or “DTR”).

Another way for the USDA to enhance the quality, utility and clarity of the information to be collected is to offer omnichannel identity verification solutions. What we mean by offering omnichannel solutions is to offer: unsupervised remote (which includes biometrics), video chat (which does not include biometrics), and in-person verification options.

An omnichannel approach ensures agencies meet users where they are, thereby increasing equity and access, while improving UX and pass rates in a cost-efficient way. Robert Asaro-Angelo, New Jersey Department of Labor & Workforce Development articulated the benefits of this approach when testifying¹⁴ to the NJ Assembly Budget Committee:

Let me be very clear about something: ID.me has increased equity in our system. Let me tell you why. Because folks in legacy systems, the way they were judged on if they were a high risk for fraud, **was based on their banking, based on their credit history**, based on if they owned a home, based on if they were transient workers or not. **With ID.me, all you need is your license or your passport or some other form of identification, that gets you through**

—Commissioner Asaro-Angelo, New Jersey DOL, in testimony to NJ Assembly Budget Committee, May 4, 2022

As another real-world example, ID.me increased verification pass rates for users from Puerto Rico from 23.9% to 78.6% through an omnichannel offering, according to a letter published by Puerto Rican Congresswoman Jenniffer González-Colón.¹⁵ “In recent years, the people of Puerto Rico have faced hurricanes, droughts, earthquakes, and the COVID-19 pandemic – which separately and combined — infringed upon our ability to access services online. These events, compounded by existing equity and access challenges, led to many Puerto Ricans struggling to verify their identities online,” said González-Colón. **“I’m glad the IRS responded to our concerns and that they brought ID.me in to address unique challenges faced by the people of Puerto Rico — who now have a higher verification success rate than overall seekers of government assistance.”** Residents of Puerto Rico are primarily Spanish-speaking and have ⅓ the median income of the overall US population. The increase in pass rate was made possible by the fact ID.me offers users multiple pathways by which to

¹⁴ <https://www.njleg.state.nj.us/archived-media/2022/ABUB-meeting-list/media-player?committee=ABUB&agendaDate=2022-05-04-10:00:00&agendaType=H&av=V>

¹⁵ <https://gonzalez-colon.house.gov/media/press-releases/irs-improves-online-identity-verification-puerto-ricans-response-rep-jennifer>

verify, including video chat and in-person verification.¹⁶ ID.me also offers these services in multiple languages (22 for online self-serve and 240 for video chat).

Lastly, USDA should consider how portability of credentials can increase their utility to both USDA and to end-users. For the end-users, verification should be a one-time event. If you make that verification event portable by securing the account with NIST AAL2 authentication, then users can assert their credential at other sites via pre-established multi-factor authentication in a matter of 20-30 seconds with a few simple clicks. **They don't have to repeat the verification process at each new agency or private sector entity they visit.**

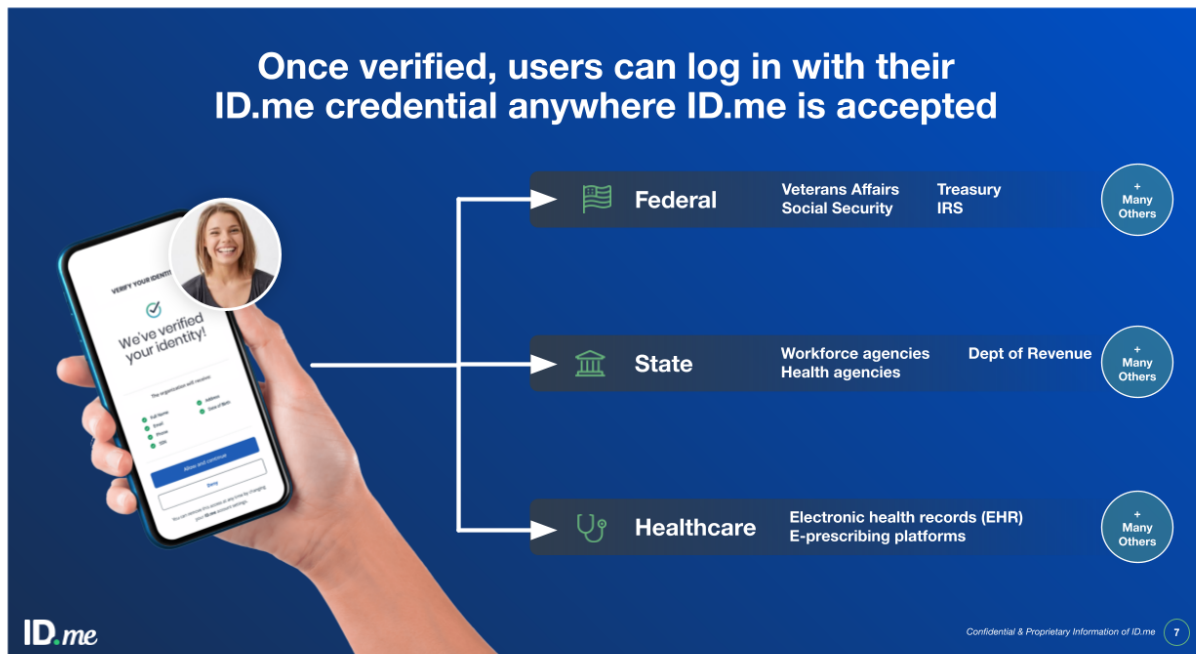


Figure 4: ID.me enables users to verify once and then use those credentials to gain access anywhere ID.me is accepted

For USDA, portability means USDA can have higher assurance interactions with end-users at lower costs. With ID.me's portable credentials, **USDA could expect that 40% of new users would arrive with a credential already in-hand.** Because these users already proved their identity at another agency and don't need to repeat verification at USDA, **ID.me can grant access at a heavily discounted cost, helping USDA avoid verification costs and driving the cost-per-user lower over time.**

We would expect USDA to benefit greatly from portability. Many of ID.me's IAL2 credentials were issued in support of Unemployment Insurance (UI) programs at State Workforce Agencies (SWAs). Independent research has shown a high rate of overlap between UI recipients and those participating in food benefit programs. **Making the credentials portable can make it easier for someone to claim**

¹⁶ Note: All pathways are available in multiple languages further increasing equity and access for verification. ID.me has completed two American Disability Act (ADA) Section 508 reviews led by two federal agencies (IRS and VA). We have remediated any identified discrepancies to the satisfaction of those agencies, which included recommendations from the National Federation of the Blind (NFB).

SNAP in their home state if they've already verified for UI. It not only eases the process for users but also increases the overall utility of data by repurposing it for multiple uses.

By considering and implementing the above learnings, USDA can significantly improve the quality, utility, and clarity of the data it collects. These strategic actions will create a robust and effective authentication approach that benefits both the USDA and the citizens it serves.

4. Ways to minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

USDA can minimize the burden on those who are to respond by (A) leveraging existing portable digital credentials and (B) offering users choice between multiple credential service providers.

A. USDA Should leverage existing portable digital credentials

First, a significant reduction in the burden of information collection can be achieved by leveraging the verification work already completed by other federal agencies. As discussed above, portable credentials mean that a user only has to verify their identity once and can assert a NIST credential at other government agencies. This reduces the workload on end-users, particularly those that participate in multiple beneficiary programs.

If USDA were to include ID.me as part of its login and authentication options, more than 44 million users across the United States would have “frictionless” access to USDA at IAL2 on Day 1. These 44 million users could access USDA services in as little as 20-30 seconds by using a NIST-conformant AAL2 multifactor authentication step that they set up when they initially verified. This approach is as close to “frictionless” as possible while ensuring users are who they claim to be. Users will not need to share any additional information or repeat a verification process they completed elsewhere. This reduces the burden on users and also expedites the verification process, enhancing overall user experience (UX) and efficiency.

Another way in which USDA can reduce burden on end-users via existing portable credentials is via pass rates. As mentioned above, ID.me’s omnichannel approach has effectively doubled access rates at multiple government agencies. In doing so, it means twice as many users are able to access agencies via more-convenient digital channels. This suggests that half as many users need to interact with agencies via call centers and in-person visits. Avoidance of more time-intensive, less efficient channels like call centers and in-person visits means users spend less time on hold or in-transit and agencies spend less money supporting end users.

To put numbers around this, GAO estimates that the cost to server users for one federal agency was \$0.20 per digital interaction, \$54 per call center interaction, and \$89 per in-person interaction. For an agency like USDA, if it were to double digital access rates for each million claimants from 40% to 80%, there would be 400,000 fewer users engaging in call center or in-person channels, which would translate to \$21-36 million lower USDA operating costs per 1 million claimants served.

For these end users, if the average call center call was 20 minutes with an average hold time of 10 minutes, these 400,000 users would have avoided over 12 million minutes on the phone.

B. USDA Should Consider Offering Multiple Credential Service Providers (“Buttons”)

Second, USDA should consider offering multiple CSPs to reduce the burden of information collection. Providing multiple CSP options increases the likelihood users will have already verified their identity with a CSP. Multiple options also results in more user participation due to convenience, *i.e.*, reducing the time and effort it takes for users to respond. Think of it like payment options at the supermarket: if the market accepts Visa, Mastercard, and American Express, there is a higher likelihood that the customer will have one of those options and it empowers the customer to choose how to pay. If USDA were to adopt a similar model, it would increase the overall number of “preverified users” and reduce the likelihood of users having to redo verification, which may lead to obstacles during the authentication process for USDA. In turn, this will increase the likelihood of successful participation.

Having multiple CSPs offers several other benefits as well. It creates a more robust and resilient system due to its redundancy. It also promotes healthy competition among providers, fostering continuous improvement in services. It also mitigates potential risks associated with data privacy and security, as the data is not concentrated in a single provider. Finally, it is consistent with Congressional guidance on this issue. Details about these additional benefits include:

1. **Increased Equity & Access:** *Agencies offering more than one CSP and multiple pathways to verification experience higher agency-wide pass rates.* There are several drivers behind this type of performance improvement:
 - **Users are more likely to have already verified their identity and arrive with a credential “in-hand.”** Between 99% and 100% of users that have already verified their identity are able to access a new agency when visiting for the first time. By offering multiple CSPs, agencies expand the number of people arriving “preverified,” meaning a larger portion of their users will have “frictionless” access when arriving for the first time.
 - **For users that have not yet verified, there are more pathways by which they can verify.** If users are unsuccessful verifying with one CSP, they can attempt with another. Each CSP offers their own unique combination of self-serve, video chat, in-person, mail, kiosk-based and other verification methods. Each CSP offers different paths, and no CSP offers all of these paths. To maximize available paths, multiple CSPs should be offered.
 - **Credential service providers cover different parts of the population.** Each CSP leverages different underlying technology. Some rely on data brokers and credit bureaus; others orchestrate across multiple verification components. Offering multiple CSPs ensures an agency will maximize accessibility for its public facing systems. **Note: CSPs with omni-channel pathways have greater coverage and pass rates than those that rely on data broker-driven solutions because those solutions are often limited to only covering users with presence in online records.**
2. **Redundancy for Periods of Unavailability:** *Using only one CSP risks limiting access to online services in the event of planned or unplanned system outages.* Given the often time sensitive nature of accessing agency services, having multiple login options available to users ensures 24/7 access for constituents. During the peak of the pandemic, one large cabinet agency and multiple state agencies had to intentionally shut down citizen-facing portals because of an overwhelming volume of fraudulent attacks. At one agency where ID.me is offered alongside another CSP, ID.me provided continuity for the agency when the other CSP experienced an unexpected

outage. By offering multiple CSPs agencies can continue operations uninterrupted when system availability issues arise or during periods of routine maintenance.

3. **Consistency with a Fiscal Year 2023 Appropriations Directive, Obama-Biden administration NSTIC strategy, and OMB M-19-17: Federal guidelines encourage adoption of shared services and multiple CSPs to promote secure and open access to benefits.** Leveraging multiple CSPs increases access *and* reduces fraud to ensure a modernized approach to digital identity. The Office of Management Budget (OMB) Memorandum-19-17, declares that “Agencies shall use federally provided or commercially provided shared services, to the extent available, to deliver identity assurance and authentication services to the public.”

Congress provided clear guidance by passing a directive in the Joint Explanatory Statement to the Consolidated Appropriations Act of 2023 that directs “government-wide policy leverages portable identity and multiple credential service providers (CSPs) independently certified against the requisite National Institute of Standards and Technology guidelines for the highest possible pass rates, fraud prevention, and cost reduction.”

–Joint Explanatory Statement Regarding the Consolidated Appropriations Act, 2023. Dec. 20, 2022

The House Appropriations Committee also noted it “*believes an open, competitive marketplace that provides citizen choice at login is the best way to drive continuous innovation in areas of access and security, best exemplified by recently developed omni-channel verification pathways for those unable to verify identity via an automated process.*” The Obama-Biden administration provided an explanation for this approach in the National Strategy for Trusted Identities in Cyberspace (NSTIC), specifically stating “NSTIC envisions a private sector led effort to create a new infrastructure for the Internet, built on interoperable, privacy-enhancing, and secure identity credentials.”

For multiple examples of best practice, you can look to agencies such as Veterans Affairs (va.gov), Social Security (ssa.gov), DOD ([Military OneSource](https://militaryonesource.mil)), or HHS ([XMS](https://xms.hhs.gov)). The model adopted by these agencies is also consistent with Congress’ view on the best way to promote security and public access to online federal services.

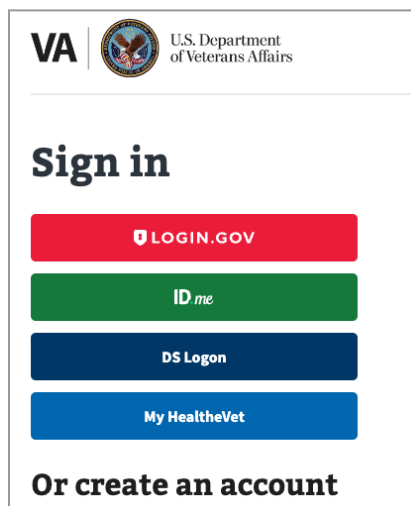


Figure 5: Federal Agencies use ID.me for login and MFA to improve UX

III. CONCLUSION

ID.me strongly supports USDA in its pursuit to enhance the quality, utility, and clarity of information collected while minimizing the burden on those responding. The need for robust digital identity and authentication strategy has been highlighted by the transition to digital platforms, a transition accelerated by the COVID-19 pandemic.

To successfully navigate this digital landscape, **ID.me encourages USDA to consider NIST conformant, portable IAL2 credentials.** In addition, USDA should consider providing users with a **choice in Credential Service Providers (CSPs) and omnichannel verification methods,** which will greatly **improve the overall user experience, boost access rates, and enhance security, while simultaneously reducing costs and increasing the utility of the collected information.**

Drawing on its extensive experience in providing secure identity verification and authentication services, ID.me is committed to sharing its insights and expertise to further enhance USDA's effectiveness and efficiency in its digital transformation journey. This commitment aligns with ID.me's goal of "No Identity Left Behind," a testament to our belief in the possibility of achieving high security without compromising access for all.