## FIPS PUB 201 - Comments on Personal Identity Verification for Employees and Contractors – The Importance of Document Authentication in the Identity Verification Process

Identity fraud and the use of fraudulent identification documents (i.e. driver licenses, passports, etc.) is often used as individuals attempt to assume other identities. Special care needs to be taken to ensure that the individual presenting themselves for the credential has not assumed the identity of another individual and or is in possession of a falsified breeder or identification document.

The current process as stated in the draft in Section 2.2.1 calls for the Registration Authority to "visually inspect the identification documents of the applicant and authenticate them as being acceptable". There are literally thousands of versions of valid identification documents and it would be virtually impossible for the Registration Authority to be familiar with all of these documents to determine if the identification document is valid. Also the quality of fake IDs are improving and it is much harder to determine if the IDs are genuine.

What is needed is a solution that layers the use of multiple methods to ensure that the person is in fact who they say they are that provides a greater chance of preventing unwanted persons from obtaining legal credentials. Document authentication forms the basis of such a solution since a government-issued photo ID is now the initial identification requirement. Authenticating an approved photo ID document such as a passport or driver's license, in combination with other methods of identity verification such as background checks, and other third party database checks, can greatly reduce the risk of issuing a good document to the wrong person. Advanced technologies exist that ensure that the security features on the IDs are in the proper format and that the document has not been tampered with. This technology removes the guesswork and will automate this process.