**Notice KI#2025-01: Accommodation of passkeys  
(*this notice supersedes Notice KI#2024-01, which is hereby withdrawn*)**

Industry is currently faced with widespread adoption of passkeys which have been identified as a valuable improvement over password authentication. Their increasing use is quickly establishing them as a significant technology, such that they cannot be ignored.

However, the use of passkeys presently creates difficulties in assessing criteria for which the CSP is unable to provide evidence of conformity because the criteria address functions which are beyond the control or visibility of the CSPand for which no third-party security evaluation is available for reliance. Consequently, KI’s Assessors are unable to determine meaningful findings that provide confidence of compliance to such criteria.

Therefore, CSPs which deploy passkeys shall mark the criteria listed below as having the following applicability:

“**In scope – Not applicable to passkeys  
Refer to Notice KI#2025-01**”

The affected 63B# criteria are:

* 1130, 1140, 1150, 1160, 1170;
* 1210, 1220, 1230, 1240, 1250, 1260, 1270, 1280, 1290, 1300, 1310, 1320, 1330;
* 1450, 1460;
* 1710.

All sub-clauses of these affected criteria are to be marked in the same manner or by stating:  
“**In scope – Not applicable, as above**”.

This notice is specific to passkey authenticators implementing the WebAuthn standard. For CSPs that support mutiple authenticator types, this notice does not alter the applicablity nor the requirement to assess against the above cited criteria for any non-passkey authenticators.

**Required Notification**

The lack of a means to effectively assess such solutions and therefore their exclusion from the scope of a Kantara Initiative Grant of Approval carries a degree of unassessed risk within services applying this Notice. Therefore, Kantara Initiative ***requires*** that CSPs that use any variant of passkeys provide to their Service Consumers and Applicants/Users notice of their use of those passkeys and state that such use includes Kantara Identity Assurance Framework and NIST SP 800-63 requirements that cannot be controlled or monitored by the CSP and thus have not been Assessed.

Therefore, where any application of this Notice is made criterion 63B#0085 (see below) must be met. If the service subject to assessment does not employ passkeys then the applicability of #9999 must be shown as “**In scope – Not applicable, no passkeys employed**”. The following criterion is hereby defined under the authority of this Notice until such time as ‘KIAF-1440 SP 800-63B SAC-SoCA’ is formally revised and published.

|  |  |  |  |
| --- | --- | --- | --- |
| *63B#0085* |  |  | *If the CSP employs passkeys it SHALL give notice through its CrP that such use is beyond the scope of any Kantara Approval which may have been granted in favour of the service.* |

Kantara Initiative therefore, shall not be liable for any risk to any party should the above recommendation not be followed.

This notice is effective from its date of publication. It is subject to change and will be updated, superseded or withdrawn as and when further detail, guidance or recommendation is available.

CSPs which have previously cited Notice KI#2024-01 in their SoCA for a presently completed and Approved service need take no action until their next Triennial Assessment or Annual Conformity Review.