**RGW: Prefatory note:**

I have located the most recent KI Notice re. adoption of ImpResources A-3-2, which is referenced here:  
<https://kantarainitiative.org/download/kiaf-1430-identity-assurance-framework-nist-sp-800-63a-service-assessment-criteria-sac-statement-of-criteria-applicability-soca/>

and that refers and hyper-links to ‘IAF Notice #23-01’, which goes to  
<https://kantarainitiative.org/wp-content/uploads/2023/09/IAF_Notice__23-01_63A-T5-1.pdf?x21808>

Regrettably, that Notice does not identify itself as Notice KI#2023-01, which of course would be a nonconformity against CO#0190 c) were Kantara Initiative to be the subject of its own criteria! However, with a wee modification it serves as an excellent *pro forma* which, I suggest, this proposed notice should adopt.

As discussed, I recommend that KI sets up a specific ‘NOTICES’ page, which should be referenced from the wiki, where all Notices can be found, including whether they are (Draft?), Current or Expired/Rescinded. Sfair, the missing notice is the one about assessments not requiring site visits whilst a pandemic was around. Don’t think that’s ever been rescinded, just lost.

And a point to note, should this not get published before 2025-01-01 then all refs to KI#2024-01 become KI#2025-01.  
RGW 2024-11-21

**Notice KI#2024-01: Accommodation of Passkeys**

Industry is currently faced with widespread adoption of Synchable Authenticators implemented using the FIDO specification <<name here>> (‘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 any variant 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 CSP. Consequently, KI’s Assessors are unable to determine meaningful findings that provide confidence of compliance to such criteria.

Kantara Initiative is in the process of assessing the risks and defining such criteria that will provide the necessary confidence that compliance can be met.

Until that is completed and communicated, CSPs which deploy any variant of Passkeys shall mark the criteria listed below as having the following applicability:

“In scope – Not applicable to Passkeys  
Refer to Notice KI#2024-01”

The affected 63B# criteria are: 0410, 0420,0430, 0440, 0450, 0460;  
1150, 1160;  
1210, 1220, 1230, 1240;  
1270, 1280, 1290, 1300, 1310, 1320, 1330;  
1450, 1460, 1470, 1480, 1490, 1500, 1510, 1520, 1530, 1540, 1550.

**Recommended 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 ***strongly recommends*** that CSPs that use any variant of Passkeys provide to their Service Consumers and Users notice of their use of those Passkeys and stress that these include NIST SP 800-63 requirements that cannot be controlled or monitored by the CSP.

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

This notice is subject to change and will be updated as and when further detail, guidance or recommendation is available.