

## Editor's Note: Verified Person Final Recommendation V1.0 Public Review

**Pan-Canadian Trust Framework** 

October 29<sup>th</sup>, 2021 Version 1.0

## 1 Overview

This document provides a summary of comments received during the public Alpha Testing review of Version 1.0 of the Pan-Canadian Trust Framework Verified Person Component, which closed May 15, 2021.

In total, 112 comments were submitted. All of those were in reference to the Conformance Profile Criteria. The reviewers classified 60 of their comments as editorial in nature (i.e., requiring simpler changes to language or format) and 52 as substantive.

Foremost amongst reviewer comments were requests to standardize the use of specific terminology throughout and across components, and guidance to clarify or simplify language. This was the case for both editorial and substantive feedback. Though recommended substantive changes of this nature were often minor, many will deliver valuable improvements.

## 2 Major Themes

The Editorial Team noted the following themes:

• Fine-tuning language

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- Simplification or clarification of language
- Removing the potential for ambiguity
- Consistent use of a one term throughout the component
- Use of unambiguously correct forms of broadly accepted terminology
- Addition of definitions
- Language that clarifies Responsible Authority obligations
  - Providing operational documentation
  - Maintaining validity of Subject records after one-time transactions are completed
  - PCTF accreditation for partners or dependencies
  - Subject records created by users without a business request (wallet)
- The use of MAY, SHOULD and MUST
  - Confusion around the purpose of MAY criteria
  - Confusion around the guarantees afforded to the community by SHOULD criteria
- Definitions of Terms
  - Trained Examiner as an auditable term
  - Minor vs Child
  - Best Practices as an auditable term
  - Misuse
  - Compensating Factors

## 3 Other Items

Due to the addition and removal of various criteria in previous versions, many criteria made direct references to other criteria that were no longer valid. Given the evolving nature of the criteria, specific references have been removed in favour of general references that should remain valid over time.

A major focus was placed on ensuring that all criteria were 'auditable'. Auditability has been defined for this purpose as follows:

Audit criteria must be written objectively such that multiple auditors reviewing the same evidence would arrive at the same compliance decision regarding the adequacy and effectiveness of the controls established to meet the requirement.

In most cases, criteria were already auditable. In 13 cases, criteria were reworded to be clearer from an auditability perspective. This was primarily achieved by being more specific about the expected outcome associated with the criteria.