IDENTITY VERIFICATION:

GSA Should Demonstrate Its Implementation of Policies for Testing Data Backups on Login.gov

Report to Congressional Requesters

June 2025
GAO-25-107000
United States Government Accountability Office

Accessible Version

GAO Highlights

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Highlights of GAO-25-107000, a report to congressional requesters

June 2025

IDENTITY VERIFICATION

GSA Should Demonstrate Its Implementation of Policies for Testing Data Backups on Login.gov

Why GAO Did This Study

The risk of identity theft and fraud has been increasing, and data breaches at federal agencies and in the private sector have resulted in the compromise of millions of Americans' personally identifiable information. The sensitive information obtained in those breaches could be used by malicious actors to commit identity fraud.

GAO was asked to examine how Login.gov compares to commercial solutions. This report, among other things: (1) compares Login.gov's capabilities to selected commercially available solutions; (2) identifies reported agency spending on Login.gov and commercial solutions; and (3) evaluates the extent to which Login.gov and other selected solutions protect the sensitive data they collect and manage.

GAO reviewed the commercial solutions' capabilities and compared them with Login.gov. GAO compared how much agencies spent on commercial solutions and Login.gov. GAO also analyzed and compared Login.gov and commercial vendors' privacy practices with industry best practices.

What GAO Recommends

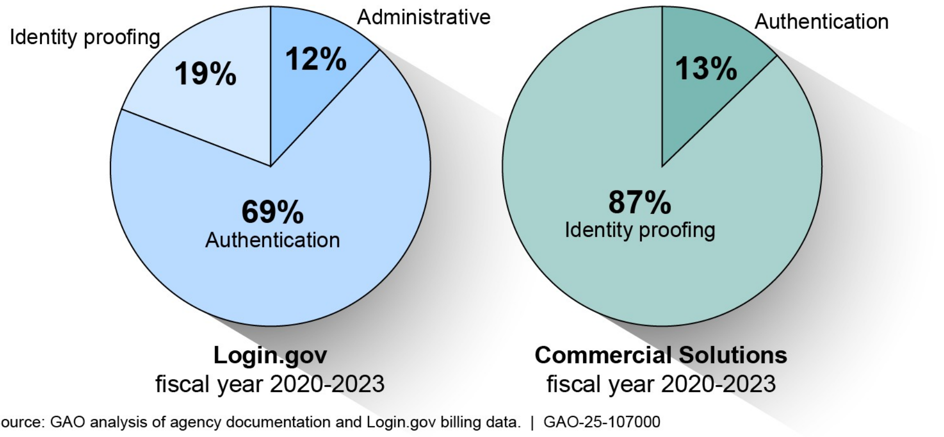
GAO is making one recommendation to GSA to ensure that Login.gov demonstrates that it fully implemented the policy to test its data backups. GSA concurred with the recommendation.

What GAO Found

In 2017, the General Services Administration (GSA) launched Login.gov, which offers various capabilities. These include multi-factor authentication, identity-verification services, and fraud prevention measures. Authentication verifies the identity of a user, process, or device before allowing access to IT systems. Identity proofing verifies whether individuals are who they claim to be. However, from fiscal years 2020 to 2023, Login.gov offered fewer capabilities compared to commercial solutions (e.g. biometrics). For example, Login.gov did not provide identity proofing services in alignment with the National Institute of Standards and Technology's standards until October 2024.

Between fiscal years 2020 and 2023, federal agencies reported spending approximately $209 million on commercial solutions while spending $32.5 million on Login.gov.

Agencies' Login.gov and Commercial Solution Spending for Fiscal Years 2020 to 2023



Source: GAO analysis of agency documentation and Login.gov billing data. | GAO-25-107000

Accessible Data for Agencies' Login.gov and Commercial Solution Spending for Fiscal Years 2020 to 2023

Login.gov: fiscal year 2020-2023

Administrative (percentage)	Authentication (percentage)	Identity Proofing (percentage)
12	69	19

Commercial Solutions: fiscal year 2020-2023

Authentication (percentage)	Identity Proofing (percentage)
13	87

Source: GAO analysis of agency documentation and Login.gov billing data. I GAO-25-107000

Note: For proprietary reasons, private vendors did not share detailed pricing information on their commercial solutions. As a result, we were not able to make a direct comparison.

Login.gov and selected commercial solutions largely implemented data protection categories in the "protect" function suggested by National Institute of Standards and Technology. Although Login.gov fully implemented four of five privacy practices, it did not fully implement policies and procedures for testing the integrity of its backup data.

According to GSA, the control was not fully implemented because Login.gov's security engineering team was not fully staffed until January 2024. At the conclusion of GAO's review, GSA reported that it had established a data protection policy; however, it has not yet demonstrated that the intended results of implementing this policy are being achieved.

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Abbreviations

- AAL: authenticator assurance level
- AAL1: authenticator assurance level 1
- AAL2: authenticator assurance level 2
- AAL3: authenticator assurance level 3
- CFO Act: Chief Financial Officers Act of 1990
- FedRAMP: Federal Risk and Authorization Management Program
- FISMA: Federal Information Security Modernization Act of 2014
- GSA: General Services Administration
- IAL: identity assurance level
- IAL1: identity assurance level 1
- IAL2: identity assurance level 2
- IAL3: identity assurance level 3
- IT: information technology
- NIST: National Institute of Standards and Technology
- OMB: Office of Management and Budget
- PII: personally identifiable information

June 3, 2025

The Honorable Pete Sessions
Chairman
The Honorable Kweisi Mfume
Ranking Member
Subcommittee on Government Operations
Committee on Oversight and Government Reform
House of Representatives

The Honorable Jamie Raskin
House of Representatives

The risk of identity theft and fraud has been increasing, and data breaches at federal agencies as well as in the private sector have resulted in the potential compromise of millions of Americans' personally identifiable information (PII).[1] The sensitive information obtained in those breaches could be used by malicious actors to commit identity fraud for financial or other gain. For example, according to the Federal Trade Commission, there were more than 1 million reports of identity theft and fraud each year in 2022 and 2023. This included fraudulently receiving government benefits, tax fraud, wage-related fraud, and creating new credit card accounts, among other things.

To reduce the threat of identity fraud, the General Services Administration's (GSA) Technology Transformation Services division launched Login.gov in 2017.[2] The system was intended to provide federal agencies with a single sign-on platform to verify the identity of individuals seeking access to government websites. Login.gov uses a three-step process—the identity proofing process—that results in the verification of an individual's identity. The process includes (1) the individual providing identifying information (e.g., name, address, date of birth, etc.); (2) the government agency validating whether the submitted information is genuine, often through a third-party organization; and (3) the agency verifying whether the individual is who they claim to be by matching the submitted information with other evidence, such as comparing a photo ID with the individual's face. In 2021, GSA allocated about $187 million in technology modernization funds to increase Login.gov's services, including strengthening its security and anti-fraud protections and improving ease of agency adoption.

However, Login.gov did not provide identity proofing services in alignment with the National Institute of Standards and Technology's (NIST) Digital Identity Guidelines until October 2024.[3] Prior to that time, Login.gov's services did not include remotely verifying the user's physical or biometric attributes. Verification, whether it is done in-person or remotely, is one of the requirements by NIST for higher assurance that the

[1] Personally identifiable information is information that can be used to locate or identify an individual, such as names, aliases, Social Security numbers, biometric records, and other personal information that is linked or linkable to an individual.

[2] According to GSA's website, the Technology Transformation Services division exists to design and deliver a digital government with and for the American people.

[3] National Institute of Standards and Technology, *Digital Identity Guidelines*, Special Publication 800-63-3; and *Digital Identity Guidelines: Enrollment and Identity Proofing*, Special Publication 800-63A (June 2017).

individual is who they claim to be. Due in part to the lack of this important functionality, several of the 24 Chief Financial Officers Act of 1990 (CFO Act) agencies reported the need to use commercially available identity proofing solutions in addition to, or instead of, Login.gov.[4] For example, the Internal Revenue Service under the Department of the Treasury uses a third-party commercial identity proofing service called ID.me to verify the identity of users that are accessing their tax returns.

You asked us to examine how Login.gov compares to commercial solutions and how each solution protects sensitive data. This report (1) reviews Login.gov's capabilities and pricing structure; (2) compares Login.gov's capabilities to selected commercially available solutions; (3) identifies reported agency spending on Login.gov and commercial solutions; and (4) evaluates the extent to which Login.gov and other selected solutions protect the sensitive data they collect and manage.

To address our first objective, we reviewed documents that detailed Login.gov's technical capabilities and its billing information. From these documents, we identified technical capabilities in the areas of authentication, identity proofing, technical features (i.e., biometrics[5], fraud prevention, and third-party vendor integration[6]), and support services. In addition to the technical capabilities, we requested and reviewed Login.gov's pricing and billing information from fiscal years 2020 to 2023. We also interviewed Login.gov officials to gain a better understanding of the system's technical capabilities and pricing models.

For our second objective, we relied on prior GAO work to identify what commercial solutions the 24 CFO Act agencies use for identity proofing.[7] We then analyzed information that detailed the technical capabilities of each of the solutions, such as documents that the vendors submitted as part of the contract solicitation process.[8] From these documents, we identified the solutions' technical capabilities in the areas of authentication, identity proofing, technical features, and support services.[9] We interviewed the commercial solution vendors that the CFO Act agencies reported using regarding their technical capabilities.[10] Lastly, we compared the commercial solutions' technical capabilities with those of Login.gov. The scope of our review was limited to fiscal years 2020 to 2023.

[4] The 24 agencies covered by the CFO Act are the Departments of Agriculture, Commerce, Defense, Education, Energy, Health and Human Services, Homeland Security, Housing and Urban Development, the Interior, Justice, Labor, State, Transportation, the Treasury, and Veterans Affairs; the Environmental Protection Agency; General Services Administration; National Aeronautics and Space Administration; National Science Foundation; Nuclear Regulatory Commission; Office of Personnel Management; Small Business Administration; Social Security Administration; and U.S. Agency for International Development. 31 U.S.C. § 901(b).

[5] Biometrics is the measurement of physiological characteristics, such as fingerprints, iris patterns, or facial features that can be used to identify an individual.

[6] Third-party vendor integration is connecting or integrating an external application or service (from a third-party vendor) with existing systems to streamline processes, enhance functionality, and improve efficiency, among other things.

[7] GAO, *Identity Verification: GSA Needs to Address NIST Guidance, Technical Issues, and Lessons Learned*, GAO-25-106640 (Washington, D.C.: Oct. 16, 2024). The identity proofing solutions used by the 24 CFO Act agencies included Experian, ID.me, LexisNexis, Login.gov, and Okta.

[8] Because we did not receive sufficient information from the commercial vendors, we relied on documents (e.g. contractual documents) provided by the 24 CFO Act agencies regarding the solutions' technical capabilities. We also used publicly available information (e.g. solutions' and agencies' public websites).

[9] The technical capabilities we reviewed included, but were not limited to, biometrics, fraud prevention, and third-party integration.

[10] The selected commercial vendors for this review were Experian, ID.me, LexisNexis, and Okta.

To address our third objective, we analyzed vendor billing and agency spending data reported by the agencies associated with the use of identity proofing solutions from fiscal years 2020 to 2023.[11] We interviewed the commercial solution vendors regarding their pricing models.[12] In addition, we compared the agencies' spending information for commercial solutions with those of Login.gov.

For our fourth objective, we analyzed NIST's *Privacy Framework: A Tool for Improving Privacy through Enterprise Risk Management* (Privacy Framework).[13] From this guidance, we identified the key practices for the "protect" function, which detail ways to protect sensitive data and prevent cybersecurity-related privacy incidents. We then requested information from Login.gov, Experian, ID.me, LexisNexis, and Okta regarding how the solutions protect PII. However, none of the commercial solution vendors provided the information, citing business sensitivity concerns. To address this, we requested the solutions' Federal Risk and Authorization Management Program (FedRAMP) packages from GSA.[14] Through this process, we were able to obtain the privacy-related documents for ID.me and Okta, which the solutions had submitted to GSA to be FedRAMP certified. According to GSA, Experian and LexisNexis are not cloud service providers authorized under FedRAMP. As a result, we were unable to obtain any privacy-related documents for Experian and LexisNexis to conduct this analysis.

Next, we compared Login.gov and the two commercial solutions' data protection policies and procedures and third-party assessment results to these key practices to determine if there were any gaps. We then interviewed Login.gov officials and the commercial solution vendors to corroborate and obtain additional information on their practices for protecting sensitive data. For more details on our objectives, scope, and methodology, see appendix I.

We conducted this performance audit from July 2023 to June 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

[11] Four out of five solutions used by the 24 CFO Act agencies that were in the scope of our review (i.e., Experian, ID.me, LexisNexis, and Login.gov) offered both authentication and identity proofing services. The fifth solution, Okta, offered only authentication services. For the purposes of this report, we refer to these solutions for identity proofing or authentication services as "identity proofing solutions."

[12] None of the commercial vendors (i.e., Experian, ID.me, LexisNexis, and Okta) that we interviewed provided any information related to their pricing and technical capabilities. The vendors cited business sensitivity concerns as the reason for not providing the information.

[13] National Institute of Standards and Technology, *NIST Privacy Framework: A Tool for Improving Privacy Through Enterprise Risk Management*, Version 1.0 (Gaithersburg, Md.: January 16, 2020).

[14] Established by the Office of Management and Budget and managed by GSA, FedRAMP is a government-wide program that is intended to provide agencies with a standardized, reusable approach for the security assessment and authorization of cloud services.

The FedRAMP Authorization Act codified the FedRAMP program. James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, div. E, title LIX, subtitle C, § 5921(a), 136 Stat. 3449, 3458 (December 23, 2022), codified at 44 U.S.C. §3607-3616.

Background

To ensure that users attempting to access government services, benefits, and other resources are who they claim to be, federal agencies are responsible for properly identifying and verifying the applicants' identities. Identity proofing is the process that federal agencies and other entities use to verify that individuals are who they claim to be. This process to either remotely or physically verify identifying documents and evidence may include a combination of government and commercial data sources containing sensitive information and in-person interactions.[15]

Identity proofing may occur in-person or through a remote online process. In the case of in-person identity proofing, a trained professional verifies an individual's identity by making a direct physical comparison of the individual's physical features and other evidence (such as a driver's license) with official records to verify the individual's identity. Validating these credentials can be performed by checking electronic records in tandem with physical inspection.

Remote identity proofing is the process of conducting identity proofing entirely through an online exchange of information. When this method is used, the individual provides the information electronically or performs other electronically verifiable actions that demonstrate their identity (e.g., selfies, verification through a virtual meeting, etc.). Once the individual provides the required information electronically, a credential service provider verifies the information before issuing credentials to that person.

Once a user's identity is verified and their credentials are issued, the user then can access government services, benefits, and other resources through the authentication process. According to NIST, authentication is the process of verifying the identity of a user, process, or device before allowing access to IT systems.[16] For example, multi-factor authentication requires a user to verify their identity by providing more than just a username and password, such as a code sent to their cellular device.

Federal Legislation and Guidance on Data Protection and Identity Proofing

Federal laws and guidance specify requirements for federal agencies to protect systems and data, including systems used or operated by a contractor or other organization on behalf of a federal agency.

- The Privacy Act of 1974 establishes agency responsibilities and protections for personal information accessed or held by federal agencies. For example, the Privacy Act places limitations on the collection, disclosure, dissemination, and use of personal information maintained in "systems of records," or

[15] National Institute of Standards and Technology, *Digital Identity Guidelines Enrollment and Identity Proofing*, Special Publication 800-63A (Gaithersburg, Md.: June 2017).

[16] National Institute of Standards and Technology, *Security and Privacy Controls for Information Systems and Organizations*, Special Publication 800-53, Rev. 5 (Gaithersburg, Md.: Sept. 2020).

groups of records under the control of any agency from which information is retrieved by individual name or identifier.[17]

- The Office of Management and Budget (OMB) Circular A-130 establishes general policy for the planning, budgeting, governance, acquisition, and management of federal information, personnel, equipment, funds, IT resources, and supporting infrastructure and services.[18] The appendices to this circular include responsibilities for protecting federal information resources and managing PII. For example, the circular requires agencies to ensure that terms and conditions in contracts and other agreements incorporate privacy requirements for the protection of federal information and to maintain an inventory of systems that create, collect, use, process, store, maintain, disseminate, disclose, or dispose of PII.
- OMB published a zero-trust strategy that requires agencies to adopt specific cybersecurity standards and objectives that are intended to form a starting point to implementing zero trust architecture.[19] The strategy's requirements include integrating and enforcing multifactor authentication across applications involving authenticated access to systems by agency, staff, and partners.
- NIST's privacy framework provides guidance to agencies on the selection and implementation of information security and privacy controls for systems.[20] Within the framework, functions organize foundational privacy activities at their highest level. The framework's "protect" function outlines the development and implementation of appropriate data processing safeguards (see table 1).

[17] 5 U.S.C. § 552a. According to the Privacy Act, a "record" means any item, collection, or grouping of information about an individual that is maintained by an agency, including, but not limited to, their education, financial transactions, medical history, and criminal or employment history and that contains their name, or the identifying number, symbol, or other identifying particular assigned to the individual, such as a finger or voice print or a photograph. A "system of records" means a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual.

[18] Office of Management and Budget, *Managing Information as a Strategic Resource*, OMB Circular A-130 (Washington, D.C.: July 2016).

[19] Office of Management and Budget, *Moving the U.S. Government Toward Zero Trust Cybersecurity Principles*, M-22-09 (Washington, D.C.: Jan. 26, 2022). Zero trust architecture is a set of cybersecurity principles that are founded on the concept that no actor, system, network, or service operating outside of, or within, an organization's security perimeter should be trusted. Instead, the principles suggest that organizations must verify anything and everything that attempts to establish access to their systems, services, and networks.

[20] National Institute of Standards and Technology, *NIST Privacy Framework: A Tool for Improving Privacy Through Enterprise Risk Management*, Version 1.0 (Gaithersburg, Md.: January 16, 2020).

Table 1: National Institute of Standards and Technology's (NIST) Privacy Framework "Protect" Function and its Categories

Function	Category
Protect: Develop and implement appropriate data processing safeguards.	Data protection policies, processes, and procedures: Security and privacy policies (e.g., purpose, scope, roles and responsibilities in the data processing ecosystem and management commitment), processes, and procedures are maintained and used to manage the protection of data.
Protect: Develop and implement appropriate data processing safeguards.	Identity management, authentication, and access control: Access to data and devices is limited to authorized individuals, processes, and devices, and is managed consistent with the assessed risk of unauthorized access.
Protect: Develop and implement appropriate data processing safeguards.	Data security: Data are managed consistent with the organization's risk strategy to protect individuals' privacy and maintain data confidentiality, integrity, and availability.
Protect: Develop and implement appropriate data processing safeguards.	Maintenance: System maintenance and repairs are performed consistent with policies, processes, and procedures.
Protect: Develop and implement appropriate data processing safeguards.	Protective technology: Technical security solutions are managed to ensure the security and resilience of systems/products/services and associated data, consistent with related policies, processes, procedures, and agreements.

Source: GAO analysis of NIST's Privacy Framework. | GAO-25-107000

In addition to laws and guidance focusing specifically on PII, agencies are subject to laws and guidance governing the protection of information and information systems. For example, the Federal Information Security Modernization Act of 2014 (FISMA) is intended to provide a comprehensive framework for ensuring the effectiveness of information security controls over information resources that support federal operations and assets, as well as the effective oversight of information security risks. FISMA requires each agency to develop, document, and implement an agency-wide information security program to provide risk-based protections for the information and information systems that support the operations and assets of the agency, including those provided or managed by another entity.

FISMA also assigns government-wide responsibilities to key agencies. For example, NIST is responsible for developing comprehensive information security standards and guidelines for federal agencies. The act also requires agencies to comply with these federal information standards and guidelines.

To fulfill its FISMA responsibilities, NIST issues technical guidelines on many different aspects of information security, including, in 2017, on authentication and identity proofing. Specifically, NIST issued guidelines that outline how to authenticate a user's claimed identity.[21] The guidelines, among other things, define authenticator assurance levels (AAL) and methods. Specifically, AALs describe the degree of strength of authenticators (i.e. the stronger the authentication, the higher the AAL). Further, authentication methods such as passwords, tokens, and fingerprint scanning are assigned one of three AALs depending on the authentication requirements for federal systems (see table 2).

[21] National Institute of Standards and Technology, *Digital Identity Guidelines Authentication and Lifecycle Management*, Special Publication 800-63B (Gaithersburg, Md.: June 2017).

Table 2: Summary of the National Institute of Standards and Technology's (NIST) Authenticator Assurance Levels (AAL)

AAL Level	Description	Requirement
AAL1	AAL1 provides some assurance that the claimant controls an authenticator used for the subscriber's account.	AAL1 requires either single-factor or multi-factor authentication. Factors could include memorized secrets (e.g. password) and physical authenticators (e.g. one-time password devices).
AAL2	AAL2 provides high confidence that the claimant controls authenticator(s) used for the subscriber's account.	AAL2 requires two different authentication factors, either (1) a physical authenticator and a memorized secret, or (2) a physical authenticator and a biometric that is associated with it (e.g. fingerprint scanner).
AAL3	AAL3 provides very high confidence that the claimant controls authenticator(s) used for the subscriber's account.	AAL3 requires a hardware-based authenticator[a] and an authenticator that provides verifier impersonation[b] resistance. Hardware-based authenticators are typically public key infrastructure-based[c] tokens, such as Personal Identity Verification cards.

Source: GAO summary of National Institute of Standards and Technology Information. | GAO-25-107000

[a] A hardware-based authenticator is a physical device (e.g. a USB key) used to verify a user's identity by providing a unique code when plugged into a computer.

[b] According to NIST, verifier impersonation is where an attacker impersonates an entity that confirms the user's identity, typically to capture information that can be used to gain access to the real verifier.

[c] According to NIST, a public key infrastructure is a framework that is established to issue, maintain, and revoke public cryptographic keys that are used to encrypt messages intended for a particular recipient.

NIST also issued guidelines in 2017 on identity proofing that outline technical requirements for resolving, validating, and verifying an identity based on evidence obtained from a remote applicant. This guidance defines identity assurance levels (IAL), which describe the degree of confidence that a user's claimed identity is their real identity (see table 3). In addition, the guidance requires applications be assigned one of three IALs based on the sensitivity of information it holds, such as Social Security numbers, and the potential harm caused if an attacker makes a successful false claim of an identity to gain system access.

Table 3: Summary of the National Institute of Standards and Technology's Identity Assurance Levels (IAL)

IAL level	Description	Verification method
IAL1	There is no requirement to link users to a specific real-life identity. Any information provided by users should be treated as self-asserted and is neither validated nor verified.	No identity evidence is collected.
IAL2	The evidence provided supports the real-world existence of users' identities and verifies that users are appropriately associated with this real-world identity. This level introduces the need for either remote or physically present identity proofing.	Evidence may include a passport or driver's license, and supporting remote biometrics, such as a "selfie."[a]
IAL3	Physical presence is required for identity proofing. Identifying attributes must be verified by an authorized and trained credential service provider representative.	Evidence may include a passport and driver's license, as well as a physical or remote interaction supervised by a live operator.

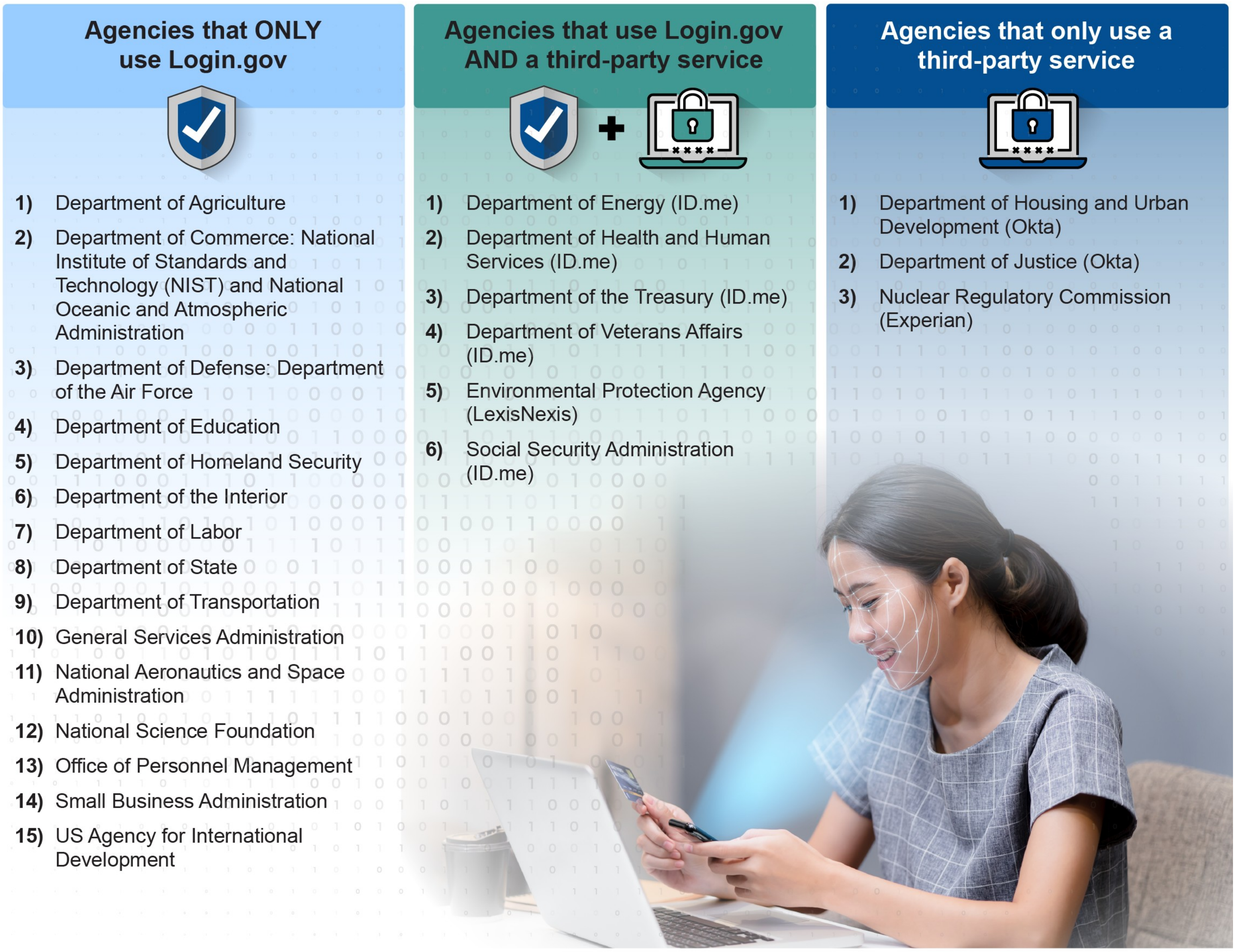
Source: GAO analysis of National Institute of Standards and Technology Information. | GAO-25-107000

[a] A "selfie" is a photograph one takes of oneself.

Federal Agencies Use a Variety of Solutions to Conduct Identity Proofing

Of the 24 CFO Act agencies, 15 reported using Login.gov for public-facing applications, six reported using Login.gov in conjunction with a commercial solution, and three reported not using Login.gov, opting instead to use a commercial solution (see figure 1). The commercial solutions that were used by the agencies were Experian, ID.me, LexisNexis, and Okta.[22]

Figure 1: Agencies' Reported Use of Login.gov and Other Solutions for Public-Facing Applications as of October 2024



Agencies that ONLY use Login.gov

1) Department of Agriculture
2) Department of Commerce: National Institute of Standards and Technology (NIST) and National Oceanic and Atmospheric Administration
3) Department of Defense: Department of the Air Force
4) Department of Education
5) Department of Homeland Security
6) Department of the Interior
7) Department of Labor
8) Department of State
9) Department of Transportation
10) General Services Administration
11) National Aeronautics and Space Administration
12) National Science Foundation
13) Office of Personnel Management
14) Small Business Administration
15) US Agency for International Development

Agencies that use Login.gov AND a third-party service

1) Department of Energy (ID.me)
2) Department of Health and Human Services (ID.me)
3) Department of the Treasury (ID.me)
4) Department of Veterans Affairs (ID.me)
5) Environmental Protection Agency (LexisNexis)
6) Social Security Administration (ID.me)

Agencies that only use a third-party service

1) Department of Housing and Urban Development (Okta)
2) Department of Justice (Okta)
3) Nuclear Regulatory Commission (Experian)

Sources: GAO (shield icon), lovemask/stock.adobe.com (all other icons); starlineart/stock.adobe.com (background); Have a nice day/stock.adobe.com (person). | GAO-25-107000

Notes: The names of any third-party services used are provided in parentheses after the agency name. The third-party provider may offer authentication only or identity proofing services.

[22] Experian is a data analytics and consumer credit reporting company that primarily provides credit risk and fraud detection services, among other things. ID.me is a credential service provider that operates as a shared service provider for authentication and identity proofing. The digital credentials can then be used to access government services and healthcare logins, among other things. LexisNexis Risk Solutions is an identity proofing service used to provide identity proofing for individuals using Login.gov. Okta is an identity access management company that provides services to manage and secure user authentication into applications.

According to Department of Justice officials, the agency does not use any identity proofing solutions to conduct authentication or identity proofing for public facing applications.

According to National Aeronautics and Space Administration officials, Login.gov is used for one public facing application.

According to Department of Defense officials, U.S. Air Force is the only component that uses Login.gov at the Department of Defense. Also, according to Department of Commerce officials, the National Oceanic and Atmospheric Administration and the National Institute of Standards and Technology are the only components at the Department of Commerce that uses Login.gov.

According to data reported by the CFO Act agencies, more users utilized Login.gov's services compared to the commercial identity proofing solutions. For example, about 190 million users utilized Login.gov compared to approximately 60 million users that utilized the four commercial solutions combined from fiscal years 2020 to 2023. In particular, the agencies that provide wide-reaching services for most of the general public (e.g., health insurance, Social Security, etc.) reported the greatest number of users of Login.gov. For example:

- The Social Security Administration uses Login.gov for multiple applications, including its MySocialSecurity portal, which allows users to access the Social Security system and perform actions such as reviewing direct deposit information and reporting wages. Approximately 42 million users reportedly used Login.gov for these services.
- The Department of Homeland Security uses Login.gov for Customs and Border Protection programs, which allows users to log in and access transportation security services such as TSA PreCheck® and Global Entry.[23] Approximately 25 million users reportedly used Login.gov for these services.

The nine agencies that reported using a commercial solution in addition to, or in place of, Login.gov did so for two main reasons. Specifically, six agencies and departments required solutions that provided transactions at the NIST IAL2 level of assurance (i.e., ID.me or LexisNexis) that Login.gov had not yet provided.[24] For example, the Internal Revenue Service requires IAL2 compliant solutions to authenticate taxpayers before granting them access to applications that collect and use sensitive data (e.g., tax account information, biometric identifiers, passport numbers, etc.). In addition, seven agencies reported that commercial solutions were more cost-effective. For example, the agencies reported that Login.gov's services were more expensive compared to commercial alternatives. Further, the Nuclear Regulatory Commission reported using Experian because the agency performs identity proofing only about 200 times a year and this option was deemed cost effective for the agency.

GAO Previously Made Recommendations Regarding Login.gov

In October 2024, we reported that GSA had taken steps to align Login.gov with NIST digital identity guidelines, including (1) completing a pilot on in-person identity proofing in March 2024 and (2) beginning a separate pilot on remote identity proofing.[25] However, GSA had not ensured that Login.gov fully aligns with federal guidelines for identity verification. Specifically, the remote identity proofing pilot was not yet available because GSA has not established an expected completion date for the pilot. Accordingly, we made three recommendations to GSA, which included (1) addressing Login.gov's technical challenges that its customer agencies identified within agreed-upon time frames, (2) establishing a completion date for the remote identity proofing pilot

[23] TSA PreCheck® and Global Entry are programs that allow expedited clearance for pre-approved, low-risk travelers that are traveling through U.S. airports. TSA PreCheck® applicants can apply online and undergo an in-person process where an enrollment provider will collect the applicants' biometric data and verify identity documents.

[24] On October 9, 2024, GSA published a press release announcing certification of IAL2 compliance for both remote and in-person identity verification offerings. We confirmed this information with GSA and the third-party certifier.

[25] GAO-25-106640.

program, and (3) ensuring that Login.gov develops and documents a plan for lessons learned for Login,gov’s remote identity proofing pilot program. As of March 2025, GAO closed the recommendation that Login.gov had completed its remote identity-proofing pilot and began offering this service to all users as implemented. However, the agency has yet to fully address Login.gov’s technical challenges and has not yet developed and documented a plan for lessons learned.

Login.gov Offered Various Capabilities and Two Pricing Structures

During fiscal years 2020 to 2023, Login.gov provided various capabilities to its partner agencies, including multi-factor authentication, identity proofing services, and fraud prevention measures.[26] In addition, Login.gov established two pricing models—enterprise and transactional—that its customer agencies could select, depending on which model may have been the most cost-effective for their needs.

Login.gov Provided a Variety of Capabilities

During fiscal years 2020 to 2023, Login.gov offered a variety of capabilities based on the customer agencies’ identity proofing and authentication needs. For example, Login.gov offered:

According to the National Institute of Standards and Technology, the following evidence are required at each identity assurance level (IAL):

- IAL1: There is no requirement to link users to a specific real-life identity. Any information provided by users should be treated as self-asserted and is neither validated nor verified.
- IAL2: The evidence provided supports the real-world existence of users’ identities and verifies that users are appropriately associated with this real-world identity. This level introduces the need for either remote or physically present identity proofing.
- IAL3: Physical presence is required for identity proofing. Identifying attributes must be verified by an authorized and trained credential service provider.

Source: GAO summary of National Institute of Standards and Technology information. | GAO-25-107000

- **Multifactor authentication.** Login.gov asked users for an email address and password to access their Login.gov account. In addition, the system required additional information, such as a security key or an authentication application to validate the user’s identity. According to NIST, the use of at least two different authentication factors provides a high assurance that the user should have access to a system and/or asset.
- **NIST IAL 1 capabilities.** Login.gov allowed the user to self-assert their personal information (e.g., first and last names, date of birth, etc.) to create their Login.gov account. According to NIST, there is no requirement to verify the identity of the user under the IAL 1 level.

[26] We selected the capabilities to review based on contractual documents that we received from the 24 CFO Act agencies. The selected capabilities included multi-factor authentication, remote and in-person identity proofing, NIST IAL levels 1 to 3, biometrics support, fraud prevention measures, third-party vendor integrations, and external and internal user support.

- **NIST IAL 2 Capabilities.** Login.gov offered the user the ability to upload an image of the front and back of their unexpired state-issued identification (ID) card. The system then verified the users' PII through a series of checks (e.g., checking for tampered IDs, ensuring that driver's license data matches the issuing state's records, etc.). However, Login.gov did not fully offer IAL 2 capabilities since it lacked remote verification. According to NIST, this capability provides assurance that the claimed identity exists.
- **In-person identity proofing.** Login.gov offered users the option to have identity proofing done in-person at a U.S. Post Office. If the user selected this option, they received a barcode after entering identifying information from their state-issued ID card, such as name, address, and ID number. Once the user presented the barcode at a U.S. Post Office for verification, the clerk completed the identity proofing process by verifying the full name and address on the state-issued ID and comparing the photo on the ID to the person present. According to NIST, in-person identity proofing provides assurance that the user is who they are claiming to be.
- **Fraud prevention measures.** Login.gov used fraud detection and mitigation tools to monitor and prevent fraud. For example, these tools monitored users through behavioral biometrics during the identity proofing process to determine if a fraudulent participant was involved during this process.[27]
- **Third-party integration.** Login.gov integrated with various LexisNexis solutions to conduct identity proofing. In addition, Login.gov integrated with the Driver's License Data Verification Service offered by the American Association of Motor Vehicle Administrators, which was to verify that the submitted PII from the user's driver's license matched the data from the user's state.
- **User support.** Login.gov provided contact center services, which answered inquiries through email and phone support. For example, users could access Login.gov's contact website to report any issues with their account (e.g., password reset, account lockout, errors during account creation, etc.) by submitting a ticket. In addition, Login.gov published a service number, which operated 24 hours a day, seven days a week.

More recently, in October 2024, Login.gov was deemed IAL2 compliant by a third-party assessor due to the addition of biometrics support capabilities that allowed it to offer remote identity proofing.[28] Specifically, Login.gov gained the ability to perform remote identity proofing by confirming that a live "selfie" taken by a user matched the photo on an ID, such as a driver's license, provided by the user. As previously mentioned, IAL2 provides a higher assurance that a user is who they are claiming to be by requiring evidence that supports the claimed identity (e.g. biometrics).

Login.gov Established Two Pricing Models

Login.gov has established two pricing models since its launch, which determined how much federal agencies were to be charged for Login.gov's services. Prior to fiscal year 2021, Login.gov charged its customers solely based on the total number of users that used the system. In and after fiscal year 2021, Login.gov offered enterprise and transactional pricing models, which allowed its customer agencies to select the most cost-

[27] Behavioral biometrics analyzes a user's digital, physical, and cognitive behavior to distinguish between cybercriminal activity and legitimate use. Behavioral biometrics provides the ability to collect and analyze risk signals based on how users interact with their devices (when accessing the Login.gov website), such as how they touch and move their devices.

[28] These capabilities were being tested by Login.gov under a pilot program after the period analyzed in this review (i.e. fiscal years 2020 to 2023).

effective model for their needs. For example, it might have been cost effective for a large customer agency with a significant number of users to select the enterprise pricing model, which charged based on tiers of the number of monthly active users. Conversely, it might have been cost-effective for an agency with a small number of users to select the transactional pricing model, which charged a fee for every transaction (e.g., authentication or identity proofing).

Login.gov Pricing Structure Prior to Fiscal Year 2021

Prior to fiscal year 2021, Login.gov adopted a pricing structure that was solely based on the total number of users that used the Login.gov system at each customer agency (see table 4). Login.gov determined the total number of users by counting each user that used the Login.gov system. For example, if the same user accessed Login.gov at multiple agencies, the user would count as one for each agency.

Table 4: Login.gov Pricing Structure Prior to Fiscal Year 2021

User Volume Range (min)	User Volume Range (max)	Yearly Price	Price per User
0	100,000	$30,000	$0.30
100,001	250,000	$72,000	$0.29
250,001	500,000	$138,000	$0.28
500,001	1,000,000	$264,000	$0.26
1,000,001	2,000,000	$506,250	$0.25
2,000,001	3,000,000	$735,000	$0.25
3,000,001	4,000,000	$945,000	$0.24
4,000,001	5,000,000	$1,138,500	$0.23
5,000,001	6,000,000	$1,311,000	$0.22
6,000,001	7,000,000	$1,476,000	$0.21
7,000,001	8,000,000	$1,612,500	$0.20
8,000,001	9,000,000	$1,755,000	$0.20
9,000,001	10,000,000	$1,883,250	$0.19
10,000,001	12,500,000	$2,310,000	$0.18
12,500,001	15,000,000	$2,610,000	$0.17
15,000,001	17,500,000	$2,925,000	$0.17
17,500,001	20,000,000	$3,022,500	$0.15
20,000,001	22,500,000	$3,120,000	$0.14
22,500,001	25,000,000	$3,217,500	$0.13
25,000,001	27,500,000	$3,315,000	$0.12
27,500,001	30,000,000	$3,412,500	$0.11

Source: Login.gov documentation. | GAO-25-107000

Login.gov Pricing Structure Between Fiscal Years 2021 - 2024

Login.gov established a pricing structure—that included enterprise and transactional pricing models—that customer agencies could select based on their needs. These needs may have included providing high numbers of transactions for services to the general public (e.g., taxes, health insurance, Social Security, etc.).

Alternatively, agencies could select a pricing model that was more cost-effective for low numbers of transactions for services to the public.

- **Enterprise Pricing Model.** Login.gov's enterprise pricing model charged a fee based on the agencies' level of monthly active users.[29] See table 5 for a breakdown of the cost model.

Table 5: Login.gov Enterprise Cost Model Fiscal Year 2021 - 2024

Monthly Active User Tier	Monthly Price
0 – 124,999	$5,000
125,000 – 249,999	$10,000
250,000 – 499,999	$19,000
500,000 – 999,999	$37,000
1,000,000 – 1,999,999	$109,000
2,000,000 – 2,999,999	$216,000
3,000,000 – 3,999,999	$358,000
4,000,000 – 4,999,999	$534,000
5,000,000 – 5,999,999	$745,000
6,000,000 – 6,999,999	$991,000
7,000,000 – 7,999,999	$1,271,000
8,000,000 – 8,999,999	$1,586,000
9,000,000 – 9,999,999	$1,936,000
10,000,000 – 10,999,999	$2,321,000

Source: Login.gov documentation. | GAO-25-107000

- **Transactional Pricing Model.** The transactional pricing model charged a fee for every transaction (e.g., authentication or identity proofing). See table 6 for Login.gov's services and prices.

[29] A user is considered "active" if they successfully log into Login.gov through multifactor authentication.

Table 6: Login.gov Transactional Pricing Model After Fiscal Year 2021

Service	Fee	Price	Description
Authentication only	Authentication fee	$0.075 per successful authentication	An authentication transaction is defined as a successful log-in attempt by a user. Every authentication is counted for usage calculations.
Authentication only	Authentication platform fee	$35,000 per year	A platform fee includes basic operational and technical support. Operational support includes managing business operations and reporting (e.g., number of users and authentication, monthly charges, etc.). Technical support includes support specific to application integration.
Authentication and identity proofing	Active identity verified user	$5 per user	A user is considered "active" if they successfully log in with multifactor authentication. A verified user is one who has successfully completed the identity proofing process.
Authentication and identity proofing	Authentication fee	$0.075 per successful authentication	An authentication transaction is defined as a successful log-in attempt by a user. Every authentication is counted for usage calculations.
Authentication and identity proofing	Identity proofing platform fee	$50,000 per year	A platform fee includes basic operational and technical support. Operational support includes managing business operations and reporting. Technical support includes support specific to application integration.
Consulting services	Consulting fee	$275 per hour	A consulting fee covers consultation beyond the included 10 hours of onboarding support. This includes user support for the customer agencies' users through its contact center, which primarily answers inquiries through email and will escalate to phone support as needed.
Technical services	Additional fee	$275 per hour	An additional fee for technical support, which costs $275 per hour, includes services, such as integrating other applications with Login.gov, and must be agreed upon and specified in an interagency agreement.

Source: GAO analysis of Login.gov documentation. | GAO-25-107000

Note: Authentication is the process of verifying the identity of a user, process, or device before allowing access to IT systems. Identity proofing is a process to verify whether the user is really who they claim to be.

More recently, in July 2024, Login.gov established a new pricing structure affecting both the enterprise and transactional cost models (see appendix III). Specifically, agencies are to be charged a fee based on the level of monthly active users for Login.gov's authentication services. According to GSA, customer agencies may see price reductions, as much as 70 percent for identity proofing services and 20 percent for authentication services with this new pricing structure. However, GSA officials noted that the amount may vary depending on the customers' usage.

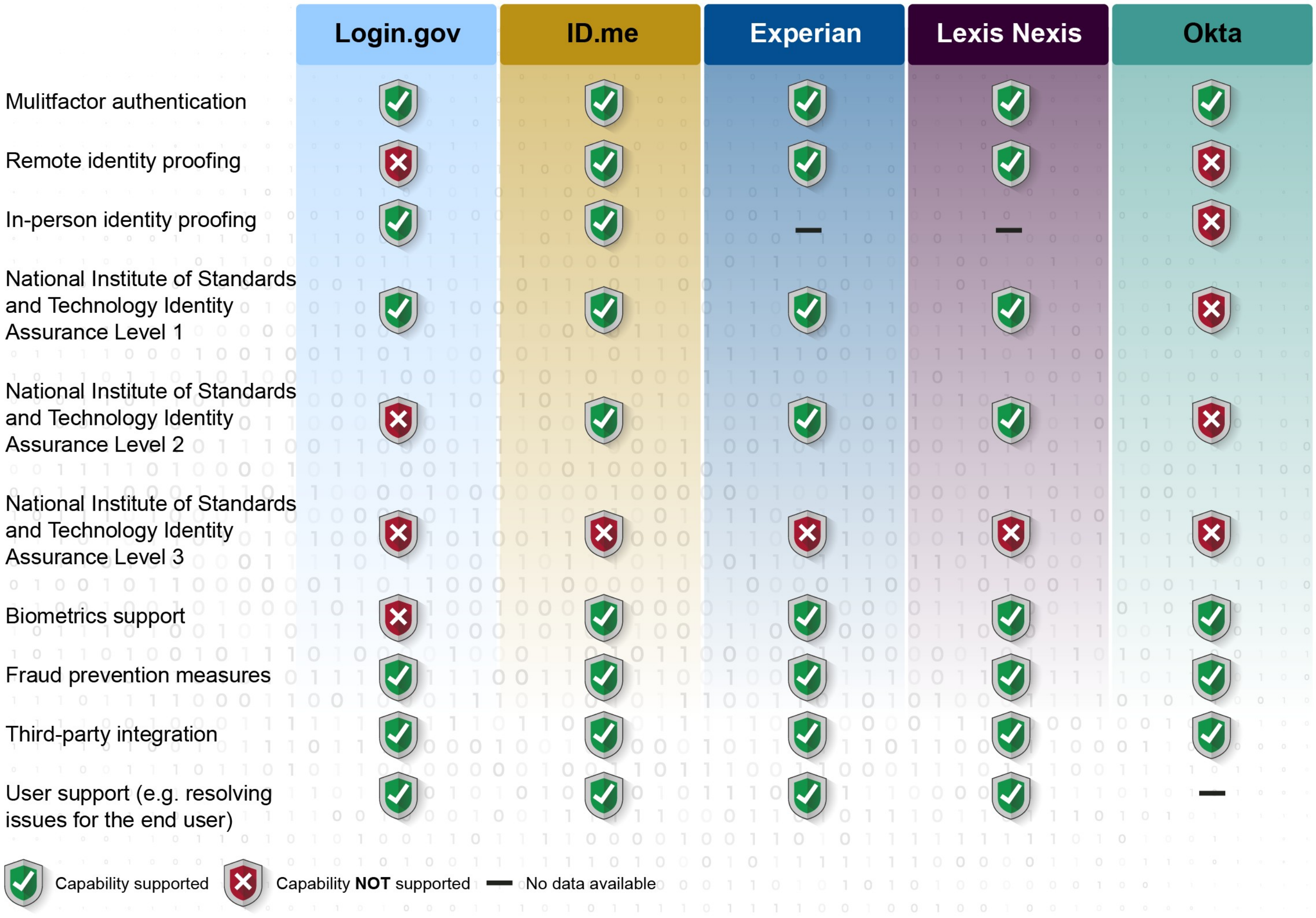
Most Commercial Solutions Offered More Capabilities than Login.gov

During fiscal years 2020 to 2023, contractual documentation showed that commercial identity proofing solutions offered more capabilities than Login.gov. Most notably, commercial solutions offered the ability to verify that people are who they claim to be at a higher assurance level, as well as the ability to perform remote proofing. For example, ID.me, Experian, and LexisNexis offered remote identity proofing and IAL2 capabilities, while Login.gov did not.[30] See figure 2 for the capabilities that each solution offered during the period of our review.[31]

[30] On October 9, 2024, GSA published a press release announcing certification of IAL2 compliance for both remote and in-person identity proofing offerings. We confirmed this information with GSA and the third-party certifier.

[31] The capabilities identified in this report do not constitute an exhaustive list of what is offered by Login.gov and commercial solutions. The specific offerings for each of the capabilities may vary.

Figure 2: Capabilities Supported by Login.gov and Commercial Solutions for Fiscal Years 2020-2023



	Login.gov	ID.me	Experian	Lexis Nexis	Okta
Mulitfactor authentication	✓	✓	✓	✓	✓
Remote identity proofing	✗	✓	✓	✓	✗
In-person identity proofing	✓	✓	—	—	✗
National Institute of Standards and Technology Identity Assurance Level 1	✓	✓	✓	✓	✗
National Institute of Standards and Technology Identity Assurance Level 2	✗	✓	✓	✓	✗
National Institute of Standards and Technology Identity Assurance Level 3	✗	✗	✗	✗	✗
Biometrics support	✗	✓	✓	✓	✓
Fraud prevention measures	✓	✓	✓	✓	✓
Third-party integration	✓	✓	✓	✓	✓
User support (e.g. resolving issues for the end user)	✓	✓	✓	✓	—

✓ Capability supported ✗ Capability **NOT** supported — No data available

Sources: GAO analysis of agency documentation; GAO (shield icons), starlineart/stock.adobe.com (background). | GAO-25-107000

Note: On October 9, 2024, GSA published a press release announcing certification of IAL2 compliance for both remote and in-person identity verification offerings. We confirmed this information with GSA and the third-party certifier

The capabilities identified in this report do not constitute an exhaustive list of what is offered by Login.gov and commercial solutions. The specific offerings for each of the capabilities may vary.

According to the National Institute of Standards and Technology (NIST), the identify-proofing process involves three steps:

- Resolution: This step starts the identity resolution process by having users provide identifying information, such as driver's license information, typically through a web-based application form.
- Validation: The authenticity and accuracy of users' personally identifiable information is compared to an authoritative source such as a motor vehicle database.
- Verification: Users take a "selfie" of themselves to match the license picture provided in the resolution step.

Source: GAO summary of NIST information. | GAO-25-107000

For the fiscal years 2020 to 2023 period, most of the commercial solutions reviewed offered more capabilities than Login.gov. Specifically:

- **Multifactor authentication.** As previously mentioned, multifactor authentication requires more than one factor to verify a user's identity. Specifically, these would include something you know (e.g. password/personal identification number); something you have (e.g., cryptographic identification device, or token); or something you are (e.g. biometric).[32] Using at least two different authentication factors provides a high assurance that the user should have access to a system or asset. All five vendors offered multifactor authentication, which included factors such as a security key, a code generator application, and codes sent by text message or phone call to verify a user's identity.
- **Remote identity proofing.** Remote identity proofing by a credential service provider verifying a user's information and physical attributes face-to-face (e.g., through a video call) can provide assurance that the user is who they are claiming to be. Users can complete the proofing process (i.e. resolution, validation, and verification) by using their own hardware and without physically meeting in person with a credential service provider. ID.me, Experian, and LexisNexis offered this capability while Login.gov did not during the period of our review. For example, ID.me offered a video call-based service, where an individual would virtually meet with an employee who remotely verified that the user's claimed identity was legitimate by reviewing the submitted documents and interviewing the user.
- **In-person identity proofing.** As previously mentioned, in-person identity proofing can provide assurance that the user is who they claim to be by having a credential service provider verify a user's information and physical attributes in-person. This capability is intended to allow users to complete the identity proofing process at a physical location with a credential service provider. Login.gov and ID.me offered this capability. For example, ID.me offered users the ability to verify their identities physically with a technician. Users could walk into or make an appointment at a retail location to which they would bring two to three required documents (e.g., state-issued driver's license, U.S. passport, etc.). Once at the retail location, a technician would verify that the documents were valid and that the documents belonged to the user. The user would also take a selfie and submit photos of the documents, after which a document reviewer would validate them.
- **NIST IAL1 capabilities.** As previously discussed, IAL1 does not include any requirements to verify the identity of a user. Login.gov, ID.me, Experian, and LexisNexis offered services that allowed users to self-assert their identities. For example, LexisNexis processed self-asserted user input (e.g., first and last names, date of birth, home address, social security number, etc.) to create user accounts. In addition, the vendors could provide confidence scores and risk indicators that could be interpreted to judge whether the user-provided data matched who they claimed to be.
- **NIST IAL2 capabilities.** As previously mentioned, IAL2 provides a higher assurance that a user is who they are claiming to be, by requiring evidence that supports the claimed identity. ID.me, Experian, and LexisNexis offered this capability while Login.gov did not during fiscal years 2020 to 2023. For example, once a user submitted their data and documents, Experian conducted a series of checks, including identity and document verification and biometric facial recognition to assess the risk that the user was not who they were claiming to be.
- **Biometrics support.** Using physiological characteristics such as fingerprints or facial features can further reduce the risk of fraud when identity proofing a user. All the commercial solutions offered biometric support while Login.gov did not during the period of our review. For example, ID.me, Experian, and

[32] According to NIST, a cryptographic device performs data protection functions, such as random number generation, message authentication, digital signature generation, encryption, or key establishment.

LexisNexis could use facial recognition technology to compare a facial image, such as a “selfie” with a photo from a driver’s license or passport to complete the identity proofing process. ID.me could also collect fingerprints as part of its identity proofing process. Okta could use fingerprint or face scanning to authenticate users to their accounts.

- **Fraud prevention measures.** Fraud mitigation measures may help in preventing users with false identities from fraudulently obtaining federal benefits or sensitive information, which can harm citizens and damage the reputation of federal agencies. All the commercial solutions and Login.gov offered fraud prevention capabilities. For example, LexisNexis’s fraud detection and mitigation solutions were intended to detect fraudulent users and applicants using analytics and behavioral biometrics.[33] This process assigns a score based on the likelihood of fraud by the user during the identity proofing process.
- **Third-party integration.** Integrating third-party solutions to an existing environment can achieve benefits such as increased efficiency, improved scalability, and cost savings. For example, if a product lacks certain features, developers can save time by integrating a solution that includes the missing features with the existing product instead of developing the lacking capabilities. All commercial solutions and Login.gov allowed integrating their solution with third-party solutions. For example, ID.me allowed integration with other third-parties such as Google and Slack.[34]

User support. This capability provides remediation when users are experiencing a disruption of services, such as when users are attempting to access government benefits. Login.gov, Experian, ID.me, and LexisNexis offered user support services. For example, the three commercial vendors provided a customer service option on their public websites, which users could access through multiple channels such as online ticket submission, live chat, or video chat.

According to the National Institute of Standards and Technology (NIST), the following are required at each identity assurance level (IAL) level:

- IAL1: There is no requirement to link users to a specific real-life identity. Any information provided by users should be treated as self-asserted and is neither validated nor verified.
- IAL2: The evidence provided supports the real-world existence of users’ identities and verifies that users are appropriately associated with this real-world identity. This level introduces the need for either remote or physically present identity proofing.
- IAL3: Physical presence is required for identity proofing. Identifying attributes must be verified by an authorized and trained credential service provider.

Source: GAO summary of NIST information. | GAO-25-107000

[33] LexisNexis’s fraud detection tools are intended to detect fraudulent applications including fake identities created by fraudulent actors and other types of fraud. The solution’s fraud mitigation tools are intended to identify several indicators of fraud, social engineering, and remote access.

[34] Google is a company that provides a search engine, email, cloud computing, and artificial intelligence services, among other products. Slack is a messaging application for businesses.

Spending for Commercial Identity Proofing Solutions Was Greater than Login.gov Due to Capability Needs of Agencies

According to the spending data reported by the 24 CFO Act agencies for fiscal years 2020 to 2023, the agencies' spending for commercial solutions was greater than Login.gov.[35] The agencies also reported that the higher spending for commercial solutions was due to the agencies needing technical capabilities that Login.gov did not offer during fiscal years 2020 to 2023. For example, a greater proportion of agencies' spending for commercial solutions was for identity proofing because most commercial solutions offered more identity proofing capabilities (e.g., IAL2, biometrics, etc.).

The Need for Increased Identity Assurances Led to Higher Agency Spending on Commercial Solutions

During fiscal years 2020 to 2023, the 24 CFO Act agencies spent a total of approximately $241.6 million to purchase public-facing identity proofing solutions.[36] Specifically, during this period, the agencies paid about $209.1 million for commercial solutions compared to $32.5 million for Login.gov. See table 7 for agency spending on Login.gov and commercial solutions from fiscal year 2020 to fiscal year 2023.

[35] As previously mentioned, agencies were billed for Login.gov's services according to Login.gov's pricing models.

[36] We analyzed information reported by the CFO Act agencies on their spending to use an identity proofing solution during fiscal years 2020 to 2023.

Table 7: Agencies' Reported Spending on Login.gov and Commercial Solutions for Public-facing Applications During Fiscal Years 2020 to 2023

Agency	Login.gov (dollar amount)	Commercial Solution (dollar amount)	Total (dollar amount)
Department of Agriculture	$132,569	na	$132,569
Department of Commerce	$168,910	na	$168,910
Department of Defense	$1,786,274	na	$1,786,274
Department of Education	$84,983	na	$84,983
Department of Energy[a]	$366,552	$0 (ID.me)	$366,552
Department of Health and Human Services[b]	$548,601	na	$548,601
Department of Homeland Security	$7,684,795	na	$7,684,795
Department of Housing and Urban Development	$124,557	$1,980,897 (Okta)	$2,105,454
Department of Justice[c]	$0	na	$0
Department of Labor	$273,042	na	$273,042
Department of State	$56,048	na	$56,048
Department of the Interior	$301,656	na	$301,656
Department of Transportation	$1,831,062	na	$1,831,062
The Department of the Treasury	$382,949	$146,663,007 (ID.me)	$147,045,957
Department of Veterans Affairs	$355,987	$46,660,998 (ID.me)	$47,016,984
Environmental Protection Agency	$144,873	$142,998 (LexisNexis)	$287,871
General Services Administration	$6,543,556	na	$6,543,556
National Aeronautics and Space Administration	$117,803	na	$117,803
National Science Foundation	$91,376	na	$91,376
Nuclear Regulatory Commission	$0	$58,000 (Experian)	$58,000
Office of Personnel Management	$4,853,743	na	$4,853,743
Small Business Administration	$3,841,243	na	$3,841,243
Social Security Administration	$2,695,548	$13,548,024 (ID.me)	$16,243,571
U.S. Agency for International Development	$162,203	na	$162,203
All CFO Act Agencies	$32,548,328	$209,053,924	$241,602,251

Source: GAO analysis of agency documentation and Login.gov billing data. | GAO-25-107000

The figures in this table do not include any funding from the Technology Modernization Fund. Agencies that use Okta reported that they use the solution solely for authentication.

Numbers are rounded to the nearest dollar.

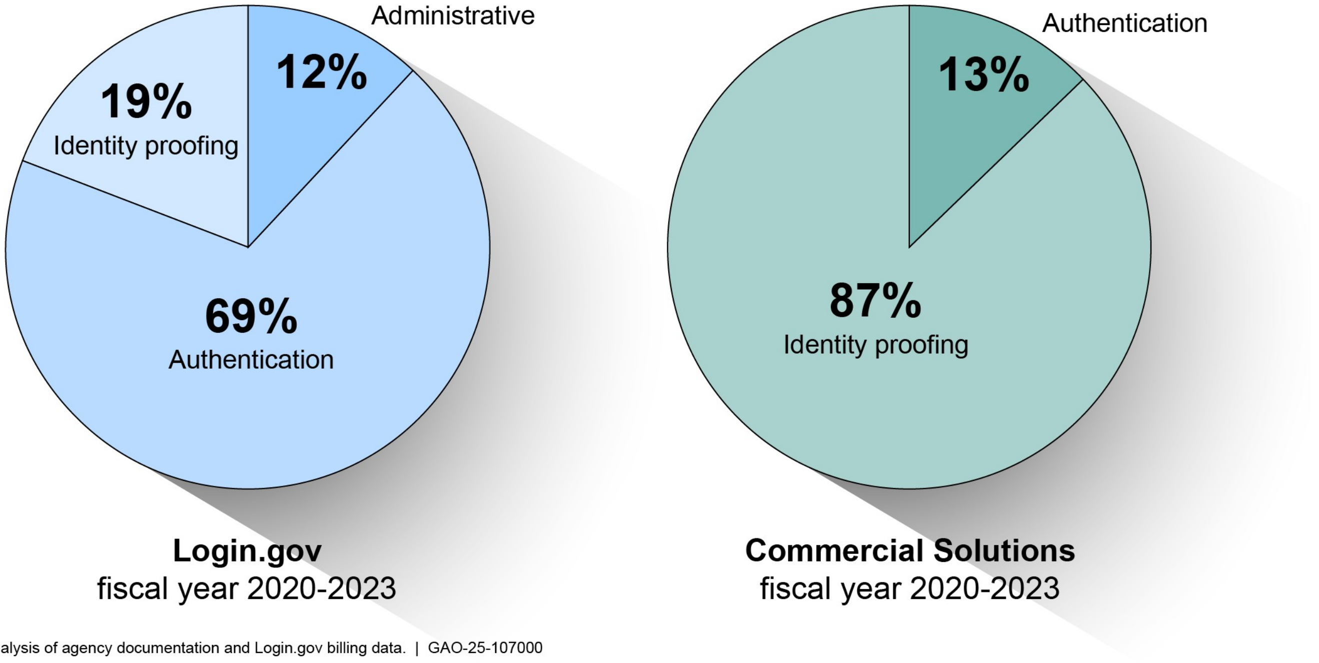
[a]The Department of Energy reported that their contract with ID.me started in fiscal year 2024, which was outside the scope of this review.

[b]The Department of Health and Human Services did not report the requested data for this review.

[c]The Department of Justice reported that they do not use any identity proofing solutions to conduct authentication or identity proofing for public-facing applications.

The majority of CFO Act agency spending on Login,gov was for authentication services, while the majority of spending on commercial solutions was for identity proofing services. In addition, the 24 CFO Act agencies spent approximately $3.9 million on fees associated with Login.gov's administrative and other costs.[37] These fees included costs related to setting up the solutions, maintenance, and consulting fees. See figure 3 for a breakdown of the agencies' spending on Login.gov and commercial solutions.

Figure 3: Agencies' Login.gov and Commercial Solution Spending for Fiscal Years 2020 to 2023



Source: GAO analysis of agency documentation and Login.gov billing data. | GAO-25-107000

Accessible Data for Figure 3: Agencies' Login.gov and Commercial Solution Spending for Fiscal Years 2020 to 2023

Login.gov: fiscal year 2020-2023

Administrative (percentage)	Authentication (percentage)	Identity Proofing (percentage)
12	69	19

Commercial Solutions: fiscal year 2020-2023

Authentication (percentage)	Identity Proofing (percentage)
13	87

Source: GAO analysis of agency documentation and Login.gov billing data. I GAO-25-107000

Note: For proprietary reasons, private vendors did not share detailed pricing information of their commercial solutions. As a result, we were not able to make a direct comparison.

The CFO Act agencies reported that their expenditures for commercial solutions were greater than Login.gov from fiscal years 2020 to 2023 due to the agencies needing technical capabilities (e.g., IAL2, biometrics, etc.) that the commercial solutions offered that Login.gov did not during that period. For example, Treasury needed to acquire IAL2 capabilities from ID.me that it required to deliver its services to the general public. Specifically,

[37] Because commercial solution costs were provided by the agencies that used the services, rather than by the commercial solutions themselves, we did not have visibility into what portion of the costs, if any, was for administrative and other fees.

IRS processes federal tax return information (e.g., Social Security numbers, bank account numbers, and taxpayer identification numbers). Because of the sensitivity of the data, IRS requires a higher assurance that a user is who they are claiming to be. During the 2022 tax season, IRS verified over 500,000 users through IAL2 transactions for online services in a single day, with a peak of 4,282 transactions-per-second.

Similarly, the Department of Veterans Affairs (VA) and the Social Security Administration spent $46.3 million and $10.9 million more, respectively, for ID.me's services than they spent for Login.gov. This was due to the VA and the Social Security Administration needing to identity proof users from outside the United States, who may need to access veteran or social security benefits. In comparison, Login.gov requires a U.S. address to identity proof users.

Login.gov and Selected Identity Proofing Solution Vendors Largely Implemented Data Protection

As previously discussed, NIST recommended practices that organizations can implement to help improve privacy risk management activities. The Privacy Framework aims to support organizations by:

- taking privacy into account during the design and deployment of systems, products, and services that affect individuals' privacy;
- communicating their privacy practices; and
- encouraging cross-organizational workforce collaboration among leadership, legal, and IT professionals.

According to NIST's Privacy Framework, the "protect" function focuses primarily on data protection. Specifically, NIST describes the function as practices that address privacy and cybersecurity risk management and are intended to prevent cybersecurity-related privacy events.

Okta has fully implemented all the data protection categories in the "protect" function suggested by NIST. However, Login.gov and ID.me addressed some but not all of the five categories described.[38] See Table 8 for a description of each category and our assessment of whether Login.gov and other commercial solutions addressed the categories described for fiscal year 2023.[39]

[38] For our review, we requested information from Login.gov, Experian, ID.me, LexisNexis, and Okta regarding how the solutions protect PII. GSA provided information regarding how Login.gov protects PII. However, all four private solutions either did not respond to our request or cited business sensitivity concerns as basis for not providing the information. To address this, we requested the solutions' Federal Risk and Authorization Management Program (FedRAMP) packages from GSA. Through this process, we were able to obtain the privacy-related documents for ID.me and Okta, which the solutions had submitted to GSA to be FedRAMP certified. According to GSA, Experian and LexisNexis are not cloud service providers authorized under FedRAMP. As a result, we were unable to obtain any privacy related documents for Experian and LexisNexis to conduct this analysis.

[39] To determine whether a practice was met, GAO referenced the vendors' policies and procedures related to data protection, as well as security control assessment reports conducted by third-party assessors. The reports included the assessors' determination whether a security control was implemented, as well as their methodology and evidence that were used to make the determination.

Table 8: Extent to Which Identity Proofing Solution Vendors Aligned with the National Institute of Standards and Technology Data Protection Categories

Function	Category	Service Provider	Rating
Protect	Data Security: Data are managed consistent with the organization’s risk strategy to protect individuals’ privacy and maintain data confidentiality, integrity, and availability	Login.gov	addressed all
Protect	Data Security: Data are managed consistent with the organization’s risk strategy to protect individuals’ privacy and maintain data confidentiality, integrity, and availability	ID.me	addressed some
Protect	Data Security: Data are managed consistent with the organization’s risk strategy to protect individuals’ privacy and maintain data confidentiality, integrity, and availability	Okta	addressed all
Protect	Data Protection Policies, Processes, and Procedures: Security and privacy policies, processes, and procedures are maintained and used to manage the protection of data. These should include items such as, purpose, scope, roles and responsibilities in the data processing ecosystem, and management commitment.	Login.gov	addressed some
Protect	Data Protection Policies, Processes, and Procedures: Security and privacy policies, processes, and procedures are maintained and used to manage the protection of data. These should include items such as, purpose, scope, roles and responsibilities in the data processing ecosystem, and management commitment.	ID.me	addressed all
Protect	Data Protection Policies, Processes, and Procedures: Security and privacy policies, processes, and procedures are maintained and used to manage the protection of data. These should include items such as, purpose, scope, roles and responsibilities in the data processing ecosystem, and management commitment.	Okta	addressed all
Protect	Identity Management, Authentication, and Access Control: Access to data and devices is limited to authorized individuals, processes, and devices, and is managed consistent with the assessed risk of unauthorized access.	Login.gov	addressed all
Protect	Identity Management, Authentication, and Access Control: Access to data and devices is limited to authorized individuals, processes, and devices, and is managed consistent with the assessed risk of unauthorized access.	ID.me	addressed all
Protect	Identity Management, Authentication, and Access Control: Access to data and devices is limited to authorized individuals, processes, and devices, and is managed consistent with the assessed risk of unauthorized access.	Okta	addressed all
Protect	Maintenance: System maintenance and repairs are performed consistent with policies, processes, and procedures.	Login.gov	addressed all
Protect	Maintenance: System maintenance and repairs are performed consistent with policies, processes, and procedures.	ID.me	addressed all
Protect	Maintenance: System maintenance and repairs are performed consistent with policies, processes, and procedures.	Okta	addressed all
Protect	Protective Technology: Technical security solutions are managed to ensure the security and resilience of systems/products/services and associated data, consistent with related policies, processes, procedures, and agreements.	Login.gov	addressed all

Function	Category	Service Provider	Rating
Protect	Protective Technology: Technical security solutions are managed to ensure the security and resilience of systems/products/services and associated data, consistent with related policies, processes, procedures, and agreements.	ID.me	addressed all
Protect	Protective Technology: Technical security solutions are managed to ensure the security and resilience of systems/products/services and associated data, consistent with related policies, processes, procedures, and agreements.	Okta	addressed all

Legend: ●=Addressed all elements of the practice. ◑= Addressed some, but not all, elements of the practice. ○= Did not address any elements of the practice.

Source: GAO analysis of vendor data. | GAO-25-107000

Each of the identity proofing solution vendors and Login.gov implemented various measures to protect the sensitive data that they process and maintain. For example:

- **Data Security.** Login.gov and Okta established protections for data-at-rest and in-transit. Specifically, the vendors implemented encryption, such as cryptographic mechanisms, to protect the confidentiality and integrity of sensitive data.
- **Data Protection Policies, Processes, and Procedures.** ID.me and Okta established processes for regular security control assessments to ensure that the security controls for protecting sensitive data were properly implemented. In addition, each vendor documented the results of the assessments and took appropriate steps to address any vulnerabilities.
- **Identity Management, Authentication, and Access Control.** Login.gov, ID.me, and Okta established policies and procedures to ensure that access to systems was limited to users that had a need to operate. For example, the vendors' user credentials were issued only to authorized users and vendors implemented separation of duties and least privilege to prevent any unauthorized activity.
- **Maintenance.** Login.gov, ID.me, and Okta established system maintenance and repair procedures, which included scheduling, performing, and documenting any maintenance activities.
- **Protective Technology.** Login.gov, ID.me, and Okta implemented measures to ensure the availability of their systems through implementing power and network redundancies and establishing contingency plans that outlined recovery procedures in the event of service disruptions.

According to a 2024 FedRAMP third-party security assessment, ID.me did not fully address data security-related practices. Specifically, ID.me had implemented outdated encryption methods to protect its sensitive data. However, according to a 2025 assessment, ID.me had updated its encryption methods to fully address this practice.

However, Login.gov did not fully address the data protection practices that NIST recommends. Specifically, although Login.gov regularly backed up its data, it did not fully establish and implement policies and procedures regarding testing the backups. Data loss—whether through a ransomware attack, hardware failure, or accidental or intentional data destruction—can have catastrophic effects on the confidentiality, integrity, and availability of any IT assets, services, and sensitive data. For example, if Login.gov's backup data was not tested to ensure that its integrity was not compromised, then it could result in complete loss of data if a breach were to occur. By ensuring that data backups are maintained and testing that the integrity of the backups is not compromised, a vendor can reduce the impact of these data loss incidents.

According to GSA, the control was not fully documented and implemented because Login.gov's security engineering team was not fully staffed until January 2024. At the conclusion of our review, GSA provided its updated policy for testing Login.gov's backup data. However, it is not yet evident that the policy has been fully implemented or if it is achieving the intended results. Until GSA demonstrates that it has fully implemented its data protection policy to test data backups, Login.gov officials will have less assurance that they are consistently and effectively ensuring the integrity and availability of its data.

Conclusions

Login.gov and the commercial solutions process and maintain PII for millions of users each year. Accordingly, it is critical for the agencies to protect the sensitive information that they are entrusted with to prevent identity fraud and theft. Although the identity proofing solutions used by the CFO Act agencies addressed most of NIST's data protection practices, Login.gov has not demonstrated that it fully documented and implemented its policies and procedures regarding testing its data backups. Addressing this gap will be an important step towards ensuring that the integrity and availability of that data will be protected, as well as the continuity of access to important government services that have a significant impact on the everyday lives of U.S. citizens.

Recommendation for Executive Action

The Administrator of the General Services Administration should direct GSA's Technology Transformation Services division to ensure that Login.gov demonstrates that it fully implemented the policy to test its data backups.

Agency Comments, Third-Party Views, and Our Evaluation

We provided a draft for review and comment to GSA, the agency to which we made a recommendation, as well as to the other 23 CFO agencies included in our review. We also provided relevant sections of the draft report to third parties, including Experian, ID.me, LexisNexis, and Okta.

GSA provided written comments—reprinted in appendix II—and agreed with our recommendation. The Acting Administrator stated that Login.gov is committed to upholding industry best practices in data privacy and cybersecurity, and has implemented robust data policies, including those around testing data backups. The Acting Administrator added that the agency will continue to build on this foundation and ensure there is a standardized mechanism to demonstrate its policy implementation. GSA also suggested a change to the title of the report to better reflect the findings, as well as technical comments, all of which we incorporated as appropriate.

We received emails from 21 agencies noting that they had no comments. Specifically, we received emails from the:

- Department of Agriculture's Office of the Chief Information Officer's Agency Audit Liaison,
- Department of Education's Office of the Secretary's Executive Secretariat,
- Department of Energy's Office of Financial and Audit Management,

- Department of Health and Human Services' Audit Liaison,
- Department of Homeland Security's Departmental GAO-OIG Liaison Office,
- Department of Housing and Urban Development's Audit Liaison Officer,
- Department of the Interior's Audit Management Division,
- Department of Justice's Audit Liaison Specialist,
- Department of Labor's Office of the Assistant Secretary for Policy,
- Department of State's Bureau of the Comptroller and Global Financial Services,
- Department of Transportation's Audit Relations and Program Improvement Office,
- Department of the Treasury's Office of the Chief Information Officer,
- Environmental Protection Agency's Audit Follow-up Coordinator,
- National Aeronautics and Space Administration's Audit Liaison Representative,
- National Science Foundation's GAO Liaison,
- Nuclear Regulatory Commission's Executive Technical Assistant,
- Office of Personnel Management's Audit Liaison,
- Small Business Administration's Director of the Office of Strategic Management and Enterprise Integrity,
- Social Security Administration's Chief of Staff,
- United States Agency for International Development's Office of the Chief Financial Officer, and
- Department of Veterans Affairs' Congressional Relations Officer.

The two remaining agencies, the Departments of Defense and Commerce, provided technical comments, which we incorporated as appropriate.

We also received technical comments from two of the third-party entities, ID.me and LexisNexis, which we incorporated as appropriate. Experian and Okta did not provide comments.

We are sending copies of this report to the appropriate congressional committees, the heads of the agencies in our review, and other interested parties. In addition, the report is available at no charge on the GAO website at https://www.gao.gov.

If you or your staff have any questions about this report, please contact Marisol Cruz Cain at CruzCainM@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.

//SIGNED//

Marisol Cruz Cain
Director, Information Technology and Cybersecurity

Appendix I: Objectives, Scope, and Methodology

Our objectives were to (1) examine Login.gov's capabilities and pricing structure; (2) compare Login.gov's capabilities to selected commercially available solutions; (3) identify reported agency spending on Login.gov and commercial solutions; and (4) evaluate the extent to which Login.gov and other selected solutions protect the sensitive data they collect and manage. The scope of our review was limited to fiscal years 2020 to 2023.

To address our first objective, we analyzed documents that detailed Login.gov's capabilities and pricing structure, such as its privacy impact assessment, technical documentation (e.g., identity proofing process charts and system security plan), as well as pricing models from fiscal years 2020 to 2023. From these documents, we identified the capabilities of Login.gov in the areas of authentication, identity proofing, technical features (i.e., biometrics, fraud prevention, and third-party vendor integration), and support services. We also determined how much Login.gov charged its customer agencies for these services from its billing records from fiscal years 2020 to 2023. Specifically, we analyzed how much each customer agency was charged, what types of services they received, and determined the billing trends. We also interviewed Login.gov officials regarding its pricing structure and capabilities.

To address our second objective, we relied on prior GAO work to identify which solutions the 24 Chief Financial Officers Act of 1990 (CFO Act) agencies use for identity proofing.[1] We then analyzed documents that detailed the capabilities of each of the commercial solutions, such as documents that the vendors submitted as a part of the contract solicitation process. These documents included system security plans and privacy policies that the vendors submitted to receive their Federal Risk and Authorization Management Program certification from the General Services Administration (GSA). From these documents, we identified the capabilities of the commercial solutions in the areas of authentication, identity proofing, technical features (i.e., biometrics, fraud prevention, and third-party vendor integration), and support services and compared them with Login.gov.[2] We also interviewed the third-party identity proofing solution vendors that the CFO Act agencies reported as using, regarding the capabilities their solutions offer.

For our third objective, we analyzed vendor billing and agency spending data reported by Login.gov and the CFO Act agencies associated with the use of identity proofing solutions from fiscal years 2020 to 2023.[3] We also interviewed the third-party identity proofing solution vendors regarding their pricing models. In addition, we compared the agencies' spending information for commercial solutions with those of Login.gov. The scope of our review was limited to fiscal years 2020 to 2023 because Login.gov's pricing structure prior to fiscal year 2020 (in which Login.gov charged its customers solely based on the total number of users that used the system) was not directly comparable to agencies who used commercial solutions.

[1] The identity proofing solutions used by the 24 CFO Act agencies included Experian, ID.me, LexisNexis, Login.gov, and Okta.

[2] The capabilities identified in this report do not constitute an exhaustive list of what is offered by Login.gov and commercial solutions. The specific offerings for each of the capabilities may vary.

[3] Four out of five solutions used by the 24 CFO Act agencies that were in the scope of our review (i.e., Experian, ID.me, LexisNexis, Login.gov, and Okta) offered both authentication and identity proofing services. For the purposes of this report, we refer to these solutions for identity proofing and/or authentication services as "identity proofing solutions."

To determine the reliability and accuracy of the data, we reviewed answers to 10 data reliability questions that addressed the internal controls of the system used to collect the data. For example, we asked questions to determine whether the system had procedures in place to consistently and accurately capture data, access controls over the data, and system changes. In addition, to verify that the data did not include obvious errors, such as missing data fields or unexplained outliers, our analysis was confirmed by a second analyst. Through these steps, we determined that the data were sufficiently reliable for our purposes.

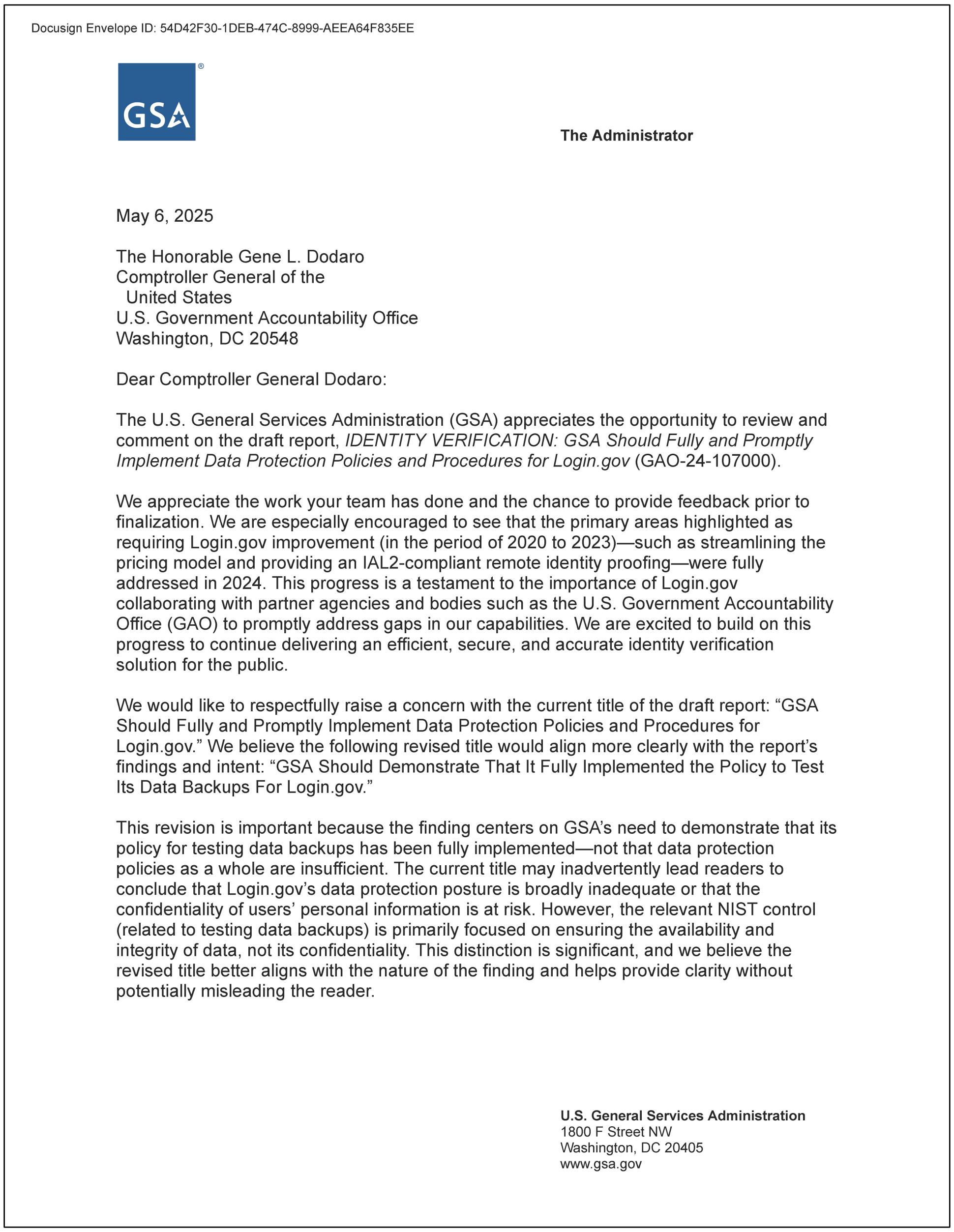
For our fourth objective, we reviewed the National Institute of Standards and Technology's *Privacy Framework: A Tool for Improving Privacy through Enterprise Risk Management* guidance to identity privacy outcomes that were related to data protection. We specifically chose the privacy categories under the "protect" function so that we could compare the identity proofing solution vendors' privacy and data protection policies and procedures to industry best practices for protecting sensitive data. According to the National Institute of Standards and Technology, the "protect" function categories include privacy and cybersecurity risk management steps to help prevent cybersecurity-related privacy events. We then requested information from Login.gov, Experian, ID.me, LexisNexis, and Okta regarding how the solutions protect personally identifiable information. However, all four private solutions either did not respond to our request or cited business sensitivity concerns as their basis for not providing the information. To address this, we requested the solutions' Federal Risk and Authorization Management Program (FedRAMP) packages from GSA. Through this process, we were able to obtain the privacy related documents for ID.me and Okta, which the solutions had submitted to GSA to be FedRAMP certified. These documents included system security plans, privacy policies and procedures, and third-party security control assessments.[4] According to GSA, Experian and LexisNexis are not cloud service providers authorized under FedRAMP. As a result, we were unable to obtain any privacy-related documents for Experian and LexisNexis to conduct this analysis.

We then compared each vendor's policies and procedures and third-party assessment results to the *Privacy Framework* categories to assess the extent to which the vendors have established programs for ensuring privacy protections in accordance with these practices. To do so, we collected and analyzed the service providers' documentation, including policies and procedures and third-party control assessments. For each practice we determined if the agency met, partially met, or did not meet each best practice based on the information collected. We considered a practice to be met if the evidence provided addressed all elements of the practice, partially met if it addressed one or more element, and not met if the evidence did not address any of the elements. After an initial determination, a second analyst reviewed the assessment for concurrence on the ratings and evidence used to support them. In cases where two analysts reached different assessments, they discussed the analysis to resolve any differences. We then interviewed Login.gov officials and the four third-party identity proofing solution vendors that the CFO Act agencies reported as using regarding the ways in which they protect sensitive data.

We conducted this performance audit from July 2023 to June 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

[4] The third-party security control assessment reports included the assessors' determination whether a security control was implemented, as well as their methodology and evidence that were used to make the determination.

Appendix II: Comments from the General Services Administration



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GSA

The Administrator

May 6, 2025

The Honorable Gene L. Dodaro
Comptroller General of the
United States
U.S. Government Accountability Office
Washington, DC 20548

Dear Comptroller General Dodaro:

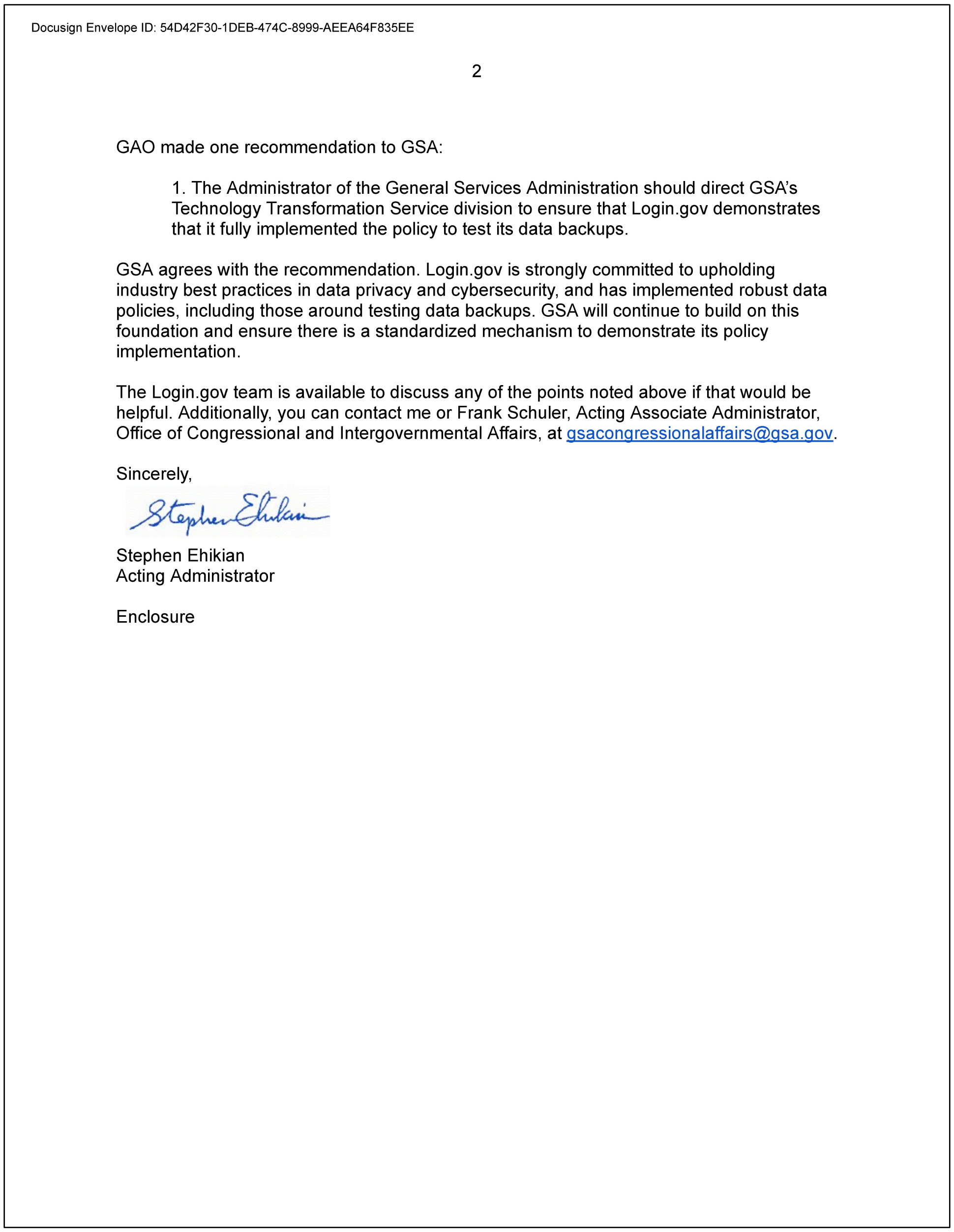
The U.S. General Services Administration (GSA) appreciates the opportunity to review and comment on the draft report, *IDENTITY VERIFICATION: GSA Should Fully and Promptly Implement Data Protection Policies and Procedures for Login.gov* (GAO-24-107000).

We appreciate the work your team has done and the chance to provide feedback prior to finalization. We are especially encouraged to see that the primary areas highlighted as requiring Login.gov improvement (in the period of 2020 to 2023)—such as streamlining the pricing model and providing an IAL2-compliant remote identity proofing—were fully addressed in 2024. This progress is a testament to the importance of Login.gov collaborating with partner agencies and bodies such as the U.S. Government Accountability Office (GAO) to promptly address gaps in our capabilities. We are excited to build on this progress to continue delivering an efficient, secure, and accurate identity verification solution for the public.

We would like to respectfully raise a concern with the current title of the draft report: “GSA Should Fully and Promptly Implement Data Protection Policies and Procedures for Login.gov.” We believe the following revised title would align more clearly with the report’s findings and intent: “GSA Should Demonstrate That It Fully Implemented the Policy to Test Its Data Backups For Login.gov.”

This revision is important because the finding centers on GSA’s need to demonstrate that its policy for testing data backups has been fully implemented—not that data protection policies as a whole are insufficient. The current title may inadvertently lead readers to conclude that Login.gov’s data protection posture is broadly inadequate or that the confidentiality of users’ personal information is at risk. However, the relevant NIST control (related to testing data backups) is primarily focused on ensuring the availability and integrity of data, not its confidentiality. This distinction is significant, and we believe the revised title better aligns with the nature of the finding and helps provide clarity without potentially misleading the reader.

U.S. General Services Administration
1800 F Street NW
Washington, DC 20405
www.gsa.gov



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GAO made one recommendation to GSA:

1. The Administrator of the General Services Administration should direct GSA's Technology Transformation Service division to ensure that Login.gov demonstrates that it fully implemented the policy to test its data backups.

GSA agrees with the recommendation. Login.gov is strongly committed to upholding industry best practices in data privacy and cybersecurity, and has implemented robust data policies, including those around testing data backups. GSA will continue to build on this foundation and ensure there is a standardized mechanism to demonstrate its policy implementation.

The Login.gov team is available to discuss any of the points noted above if that would be helpful. Additionally, you can contact me or Frank Schuler, Acting Associate Administrator, Office of Congressional and Intergovernmental Affairs, at gsacongressionalaffairs@gsa.gov.

Sincerely,

Stephen Ehikian

Stephen Ehikian
Acting Administrator

Enclosure

Accessible Text for Appendix II: Comments from the General Services Administration

The Administrator

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U.S. Government Accountability Office
Washington, DC 20548

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Sincerely,

Stephen Ehikian
Acting Administrator

Enclosure

Appendix III: Login.gov's New Pricing Structure

In July 2024, Login.gov finalized a pricing structure for its customer agencies for the remainder of fiscal year 2024 and fiscal year 2025. Specifically, agencies are charged a fee based on their level of monthly active users for authentication services.[1] See Table 1 for the new authentication pricing model.

Table 9: Login.gov New Authentication Pricing Model

Monthly Active User Tier	Price per Active User
0 – 24,999	$0.1000
25,000 – 49,999	$0.0975
50,000 – 99,999	$0.0951
100,000 – 249,999	$0.0927
250,000 – 999,999	$0.0904
1,000,000 – 4,999,999	$0.0881
5,000,000 +	$0.0859

Source: GAO analysis of Login.gov documentation. | GAO-25-107000

In addition, Login.gov also charges a fee for other add-on services. For example, identity proofing is an add-on service, which would cost the agencies $3 per active user in a "proofing" year and $1 per active user in a "non-proofing" year.[2] According to Login.gov's documentation, this charging cycle is guided by a five-year credential lifecycle, where a user would be required to complete a full proofing process during the initial year and would not be required to repeat the process for five years. Exceptions would include cases of suspected fraud, where the user would be required to repeat the full proofing process (see Table 2).

Table 10: Login.gov New Identity Proofing Pricing Model

Years	Cost
1 (need full identity proofing)	$3 per active user
2 (does not require identity proofing)	$1 per active user
3 (does not require identity proofing)	$1 per active user
4 (does not require identity proofing)	$1 per active user
5 (does not require identity proofing)	$1 per active user
6 (need full identity proofing)	$3 per active user
7 (does not require identity proofing)	$1 per active user
8 (does not require identity proofing)	$1 per active user
9 (does not require identity proofing)	$1 per active user
10 (does not require identity proofing)	$1 per active user

Source: GAO analysis of Login.gov documentation. | GAO-25-107000

[1] A user is considered "active" if they successfully log into Login.gov through multifactor authentication.

[2] Login.gov defines a "proofing" year as a year in which a user would complete a full proofing process and "non-proofing" year as a year during which the user's proofing period has not expired.

In addition to the authentication and identity proofing pricing structure, Login.gov charges a monthly minimum fee of $2,500. The fee covers the first $2,500 of any combination of authentication and identity proofing transactions. If a customer agency incurred less than $2,500 in usage fees, the difference would be billed as the minimum that month. Similarly, if a customer agency incurred fees that are more than $2,500, no minimum fee would be billed for that month.

If a customer agency requests any Login.gov-related technical support that is beyond the agreed-upon scope of work in the interagency agreement, Login.gov charges $275 per hour. These services include consultation beyond the included onboarding support and must be agreed upon through an interagency agreement. In addition, Login.gov offers support for the customer agencies' users through its contact center, which primarily answers inquiries through email and will escalate to phone support as needed.

Appendix IV: GAO Contacts and Staff Acknowledgments

GAO Contacts

Marisol Cruz Cain, CruzCainM@gao.gov.

Staff Acknowledgments

In addition to the contacts listed above, the following staff made key contributions to this report: Elena Epps (assistant director), Keith Kim (analyst in charge), Tracey Bass, Kami Brown, Kisa Bushyeager, Christopher Businsky, Chase Carroll, Kristi Dorsey, Jonnie Genova, Elizabeth Gooch, Corwin Hayward, Ceara Lance, Michael Lebowitz, Evan Nelson Senie, Sejal Sheth, Andrew Stavisky, and Adam Vodraska.

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