Section #	Description of Change	Implication of Change
5.1	Clarifies the relationship between the Registration Authority (RA) and the Credential Service Provider (CSP) when these functions are implemented by separate entities. NIST clarifies that this relationship could be contractual or based on existing laws or regulations (e.g. when a notary serves as the RA).	Promotes the use of existing infrastructure of identity proofing schemes (such as notary services) as Registration Authorities for credential issuance.
5.3.1	Clarifies that remote identity proofing mechanisms (at levels 2 and 3) were designed for full automation. However, online mechanisms such as call centers can also be used to complement the automated mechanisms.	Recognizes automated implementation of remote identity proofing schemes that can be completed in a single session with the Applicant. This removes delays (associated with snail mail or use of multiple online sessions) and reduces cost and complexity of the process to make it suitable for credential issuance for large populations. Additionally, the changes allow the use of call center mechanisms (lower cost when compared with in-person identity proofing) in instances where full automation of the remote identity proofing process is not practical.
5.3.1 Table 3	Provides some examples of what constitutes "current primary government picture ID".	Removes ambiguity regarding acceptable types of ID for remote versus in-person identity proofing.
5.3.1 Table 3	Tightens the language of remote identity proofing at Level 3 to require that both the ID number AND the account number must be associated with the Applicant's name and address in records.	Removes weaknesses in the existing text for Level 3 remote identity proofing where it was possible to use an account number (such as a pre-paid cell phone account number) that was not necessarily associated with the Applicant's name or address.

5.3.1 Table 3	Adds a technique for address confirmation that allows the use of electronic mechanisms such as SMS, phone or email as long as these are tied to the Applicant's physical address in records. Removes the requirement for voice recording of the Applicant (or something equivalent) for non-repudiation purposes.	Allows the identity proofing and credential issuance functions to be completed in real-time within a single session with the Applicant through the use of an out-of-band electronic confirmation mechanism. This removes the delays and costs related to snail mail based address confirmation or voice recordings. The result is improved efficiency and usability as well as reduced cost of credential issuance.
5.3.1	Clarifies that a phone (cell or landline) account can be used as a "financial" account for identity proofing purposes as long as the account is associated with the Applicant's name and address in records. However, in this case, the same phone number cannot be used for address confirmation of the Applicant.	Recognizes that if the Applicant has a phone number that is associated with their name and their physical address, this can be leveraged as an effective mechanism for identity proofing.
5.3.2	Adds text to allow the identity proofing step to be simplified for issuance of credentials to Applicants who hold professional licenses governed by Federal or State laws (such as for medical doctors, nurses, lawyers) that require strict identity proofing processes. For levels 2 and 3, remote issuance of such credentials (based on an existing professional license) is allowed as long as the issuance process confirms the address of record for that Applicant.	Allows CSPs to leverage existing professional licensing schemes that require stringent identity proofing mechanisms to issue additional credentials without further identity proofing. This lowers the complexity and cost of credential issuance while greatly improving the user experience.