



Disclaimer:

As a condition to the use of this document and the information contained herein, the Facial Identification Scientific Working Group (FISWG) requests notification by email before or contemporaneously to the introduction of this document, or any portion thereof, as a marked exhibit offered for or moved into evidence in any judicial, administrative, legislative, or adjudicatory hearing or other proceeding (including discovery proceedings) in the United States or any foreign country. Such notification shall include: 1) the formal name of the proceeding, including docket number or similar identifier; 2) the name and location of the body conducting the hearing or proceeding; and 3) the name, mailing address (if available) and contact information of the party offering or moving the document into evidence. Subsequent to the use of this document in a formal proceeding, it is requested that FISWG be notified as to its use and the outcome of the proceeding. Notifications should be sent to: chair@fiswg.org

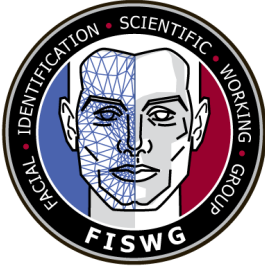
Redistribution Policy:

FISWG grants permission for redistribution and use of all publicly posted documents created by FISWG, provided that the following conditions are met:

Redistributions of documents, or parts of documents, must retain the FISWG cover page containing the disclaimer.

Neither the name of FISWG, nor the names of its contributors, may be used to endorse or promote products derived from its documents.

Any reference or quote from a FISWG document must include the version number (or creation date) of the document and mention if the document is in a draft status.



Facial Recognition Technology Deployment Guidelines

1. Scope

1.1 This document provides guidance for agencies looking to deploy facial recognition technology (FRT). It is not all-encompassing but is broad enough to cover most FRT use cases.

1.2 The document covers the end-to-end process from planning to procurement and ongoing management of the technology.

1.3 This document focuses mostly on the technology and not on the human operator. Agencies are encouraged refer to Training and 1:1 FISWG documentation for in-depth guidance on how to train and manage human operators dealing with FRT.

2. Referenced Documents

2.1 *FISWG Standards:*

FISWG Minimum Training Criteria When Using Facial Recognition Systems

FISWG Guide for Facial Comparison Training of Reviewers to Competency

FISWG Principles for Responsible Use of Facial Recognition Technology

15 FISWG Standard Guide for Capturing Facial Images for Use with Facial Recognition
16 Systems

17 FISWG Facial Recognition Systems: Operation Assurance Series

18 3. Terminology

19 3.1 *Acronyms:*

20 3.1.1 *DET, n*—Detection error tradeoff

21 3.1.2 *FAR, n*—False acceptance rate

22 3.1.3 *FRR, n*—False reject rate

23 3.1.4 *FRS, n*—Facial Recognition System

24 3.1.5 *FRT, n*—Facial Recognition Technology

25 3.1.6 *ROC, n*—Receiver Operating Characteristic Curve

26 3.1.7 *SDK, n*—Software development kit

27 4. Significance and Use

28 4.1 Planning for and deploying a facial recognition system (FRS) is a significant
29 undertaking that can be overwhelming without proper support and guidance.

30 4.2 This document provides a structured process that agencies looking to deploy a
31 facial recognition system can follow. Following this process will help agencies

32 strengthen the integrity of their deployment, backed by strong foundational
33 documentation.

34 4.3 This document is relevant for law enforcement, document issuance, and border
35 and access control agencies looking to deploy FRT.

36 4.4 This document is broken into three major phases: Planning, Procurement, and
37 Deployment and Ongoing Management.

38 5. Planning

39 5.1 The planning phase is the first of three major phases on the road to deploying
40 FRT. This phase provides a much-needed foundation for the procurement process and
41 supports the agency's use of FRT. A significant amount of planning needs to take place
42 before procurement, and the information in this section can be used to help guide the
43 agency through the planning process.

44 5.2 **Define Use Case** - The goal of this phase is to establish a high-level
45 understanding of how the agency wants to use FRT. This phase serves as a foundation
46 for subsequent phases, as the use case dictates the structure and requirements for the
47 planning, procurement and deployment process.

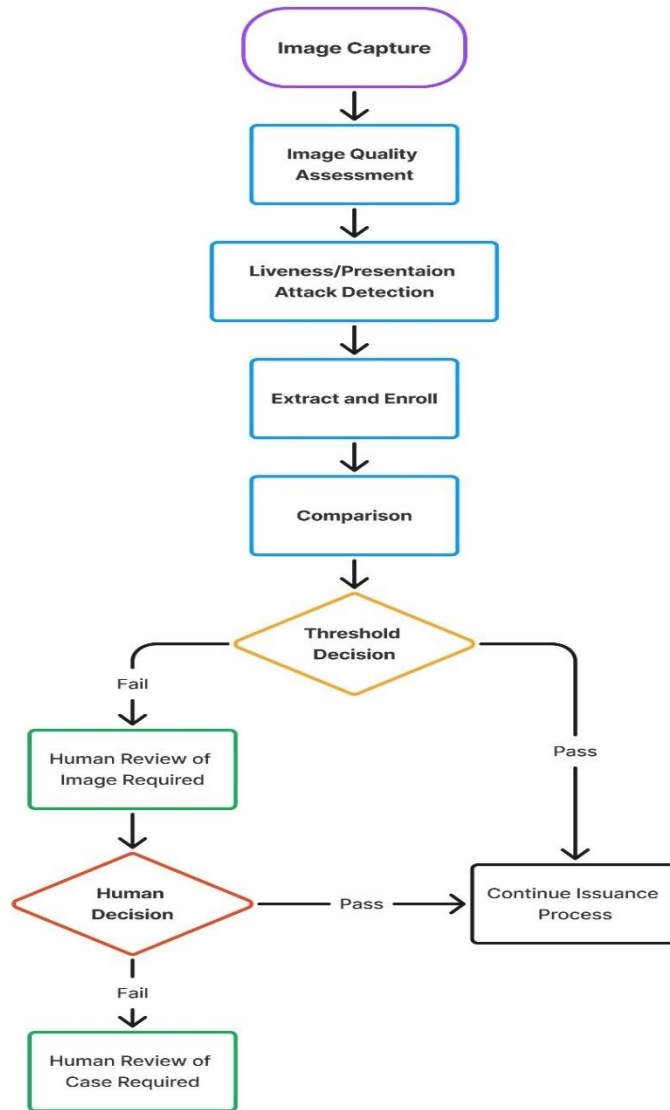
48 5.2.1 A successful deployment needs to be underpinned by strong foundational
49 documentation specific to the agency's use case. FRT has many potential use cases.
50 To name a few, it can be used in law enforcement to help generate an investigative lead
51 or help identify persons of interest; in document issuance to help verify the identity of

52 applicants; or in access control to help determine whether an individual has access to a
53 building, system, service, or device.

54 5.2.2 With so many different potential uses, it is important that agencies understand
55 the specifics of their particular use case and the purpose that the technology will serve.
56 In addition, it is important that the agency understands the problem that they are trying
57 to solve by adopting the technology and ensures that adopting the technology will
58 actually solve this problem.

59 5.2.3 For this phase, agencies are encouraged to draft a workflow specific to the
60 end-to-end FRT process that shows how FRT will be used by the agency and how it will
61 fit into existing agency-specific workflows. An example of a general FRT workflow can
62 be found below in Figures 1 and 2. It should be noted that workflows could include
63 either more or less than what is depicted in the figures 1 and 2.

64 5.2.4 Outcome - At the end of this phase, agencies should have defined their
65 respective FRT use case and developed high level documentation that details the
66 purpose that the technology will serve and how it will fit into existing agency processes
67 and frameworks. This documentation will serve as the foundation of the planning
68 process.

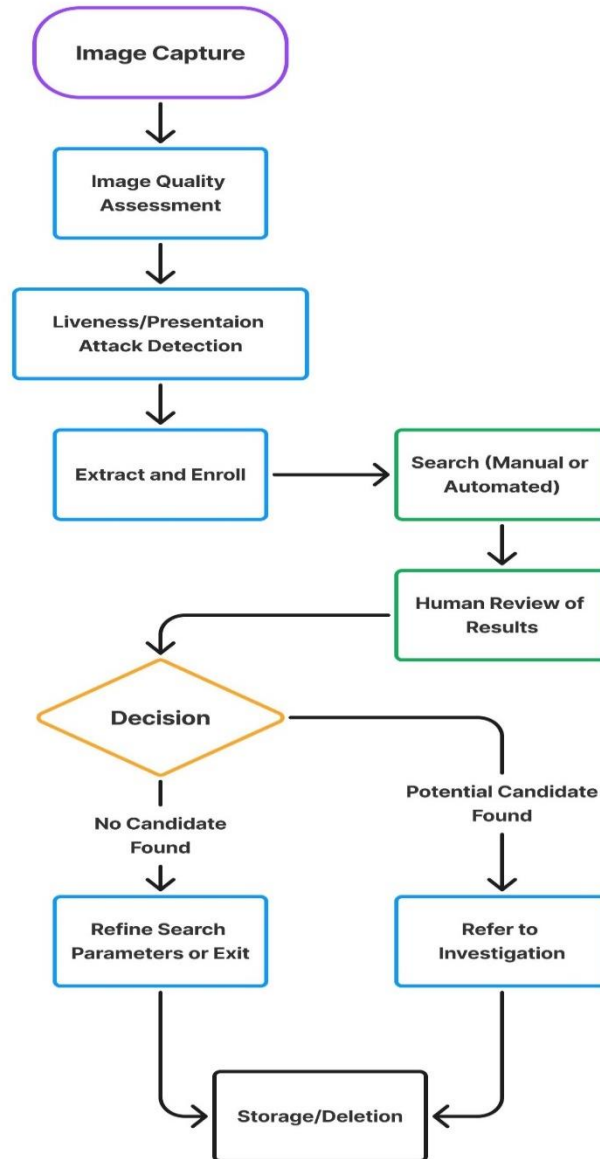


69

70

71

Figure 1: High Level FRT Flow – Document Issuance



72

73

Figure 2: High Level FRT Flow – Law Enforcement, Border and Immigration

74

75

5.3 Ethical Considerations - The goal of this phase is to discuss and document

76

ethical considerations related to the agency's use of FRT. Considering ethics early on in

77 the deployment process will help the agency understand what type of ethical
78 considerations apply to their specific use case, and this information can be used to help
79 shape policy and procedures. In addition to the recommendations in this section, many
80 guidelines and frameworks exist in this space that can also be leveraged, and the
81 content in this section takes many of these frameworks and guidance into
82 consideration.¹

83 5.3.1 There are several ethics-related components to consider when looking to
84 deploy FRT. The considerations in this area will differ depending on the use case and
85 region. For example, an agency may need to comply with overarching guidance
86 documents when looking to deploy FRT – and these documents often contain ethical
87 considerations specific to FRT (e.g., EU AI Act, Illinois Biometric Information Privacy
88 Act).

89 5.3.2 Agencies are encouraged to research how each of the following areas may
90 apply to their specific use case, in their specific region, to determine if they need to
91 include requirements related to ethics in their deployment project:

- 92 • Human Rights – Does your proposed use of FRT align with relevant human
93 rights legislation and regulations?
- 94 • Consent – Do you need consent to collect and enroll your client data into an
95 FRS?

¹ <https://www.weforum.org/publications/a-policy-framework-for-responsible-limits-on-facial-recognition-use-case-law-enforcement-investigations-revised-2022/>; <https://www.biometricsinstitute.org/the-three-laws-of-biometrics/>

- 96 • Surveillance – Does your use case involve surveillance? If it does, does
97 policy, legislation and regulations in your region support this type of use?
- 98 • Privacy – Do relevant legislation, regulations and policies related to privacy
99 support your proposed use of FRT?
- 100 • Security – What type of steps do you need to take to protect the biometric
101 information of your clients and to protect your clients' data from attacks?
- 102 • Bias – How might potential bias impact your clients? How can you limit the
103 presence of bias in your end-to-end FRT process?²

104 5.3.3 Outcome - At the end of this phase, agencies should have documentation
105 showing how they have taken ethics into consideration during the design and
106 deployment of FRT. This documentation will help shape policies and procedures and
107 will help ensure that agencies have taken the necessary steps towards using FRT
108 responsibly.

109 5.4 **Governance** - The goal of this phase is to ensure that the agency has the
110 authority to use FRT and that the use is well supported by relevant legislation,
111 regulations, policies, and procedures. When the use of FRT is supported by strong
112 documentation, risk is minimized and the path to deployment is smoother.

113 5.4.1 *Legal Authority, Legislation, and Regulations* - Ensuring that the agency has
114 the legal authority, and its use is supported by relevant legislation and regulations is a
115 fundamental beginning step in the facial recognition acquisition and deployment
116 journey. Documentation in this area establishes if the technology can be used and if so,

² More information on this consideration can be found in the testing section of this document.

117 how it can be used in compliance with the law. Understanding the implications of
118 relevant legislation and regulations at the beginning of a deployment project can help
119 agencies ensure that they build the FRS in a way that aligns with this documentation –
120 reducing the probability of complications in this area and increasing the likelihood of a
121 successful and compliant deployment.

122 5.4.2 *Policy* - Once the agency has determined that their use of FRT will comply
123 with relevant legislation and regulations, the next step is to review and/or develop
124 policies that will define how the technology can be used by the agency. Defining how
125 technology can be used is an essential step that should be taken before deployment.
126 Understanding how the technology will be used will help the agency develop business
127 requirements that meet their needs, guided by strong policy. Existing policies should be
128 leveraged, where possible. If policies do not exist that cover the use of FRT, the agency
129 should consider drafting new policies or adopting and modifying policies from other
130 agencies that share similar mandates. As policy can take a long time to draft, it is
131 recommended that the agency start work in this area as soon as possible.

132 5.4.2.1 It is important to note that the agency should consider policy from several
133 different areas when working through an FRS deployment. Many different stakeholders
134 are involved with a typical deployment process, so agencies should ensure that policies
135 from all areas are considered (procurement, risk management, finance, organizational
136 alignment, privacy and ethics, information management, security, identity management,
137 biometrics, emergency management, information sharing, standards, training, and
138 support). The aforementioned list can also be leveraged to assign the necessary
139 stakeholders to the deployment project.

140 5.4.3 *Procedures* - Drafting detailed procedures on exactly how the technology will
141 be used helps ensure compliance with legislation, regulations, and policy. In addition,
142 detailed procedures help ensure that all technology operators will use the technology in
143 a consistent way. Consistent use of the technology across the agency increases the
144 likelihood that the technology will be used responsibly and in line with standards and
145 best practices, which limits risk.

146 5.4.3.1 The agency should consider drafting procedures for each stage of the end-
147 to-end FRT process. Agencies are encouraged to use Figure 1 and 2 in Section 5.1 as
148 a reference to help develop procedures for each step in the process flow.

149 5.4.4 *Outcome* - At the end of this phase, agencies should have gathered (or
150 drafted) legislation and regulations that give them the authority to use FRT; gathered or
151 drafted policies that define how the technology can and will be used; and drafted
152 procedures – to the extent possible – that detail how each type of user will use the FRS.
153 This documentation will help agencies plan subsequent phases of the deployment and
154 can be leveraged to show that the technology is being used responsibly, consistently,
155 and in line with relevant legislation, regulations, policies, and procedures.

156 5.5 **Communications Strategy** - The goal of this phase is to draft a
157 Communications Strategy that will create the narrative for the deployment project and
158 serve as a method to communicate information about the deployment to relevant
159 stakeholders and the media.

160 5.5.1 *Stakeholder Communication* - From a stakeholder perspective, clear and
161 concise communication keeps stakeholders in the know and helps increase buy-in from
162 employees, management, and other stakeholders. As a whole, this will help ensure that

163 the deployment project runs as smoothly as possible and that risks related to
164 misunderstanding will be limited. In addition to clear and concise communication,
165 agencies could also consider a feedback mechanism for stakeholders. Gathering
166 feedback during a deployment project can help identify issues, improve project
167 relationships and further mitigates the risk of issues.

168 *5.5.2 Media Communication* - Agencies should expect questions from the media or
169 general public and, where possible, should prepare a strong external communications
170 package that can be leveraged to help respond to these questions. The
171 communications package should be clear and concise and should be based on
172 terminology from a recognized source³. Consistent terminology helps limit
173 misunderstandings and ensures that the right message makes it to the right people at
174 the right time.

175 *5.5.3 Communications Package Strategy* - In terms of strategy, the agency could
176 consider drafting a Frequently Asked Questions (FAQ) document that could be
177 leveraged for both stakeholder and media communications purposes. The FAQ
178 document could contain questions and answers about the technology in general and
179 more specific questions and answers related to the deployment project and the
180 agency's use case. FISWG's FAQ document can serve as an example:

181 <https://fiswg.org/faq.html>

182 *5.5.4* The outcome of this phase is for the agency to possess documentation that
183 can be leveraged to promote clear and consistent messaging about FRT in general and

³ Consistent terminology sources: FISWG Glossary and ISO Harmonized Biometrics Vocabulary: ISO/IEC 2382-37:2022

184 the agency's deployment project to relevant stakeholders. Clear and transparent
185 communication (where possible) will help build trust in the technology, which will help
186 the biometrics community as a whole.

187 **6. Procurement**

188 6.1 The goal of this phase is to provide a high-level overview of the procurement
189 process via a breakdown of each of the below-mentioned components, which will help
190 the agency plan for an effective and efficient deployment.

191 6.1.1 Any acquisition of FRT will likely have to go through a formal procurement
192 process. Procurement process structure can vary per region, but, in general, the
193 following components will be included:

- 194 • Project Plan
- 195 • Risk Management Plan
- 196 • Business Case
- 197 • Requirements Gathering
- 198 • Request for Information (RFI)
- 199 • Request for Proposal (RFP)
- 200 • Vendor Evaluation
- 201 • Negotiate Contract
- 202 • Deployment Plan
- 203 • Build

- 204 • Test
- 205 • Deploy
- 206 • Review

207 6.2 Procurement Components and Associated Steps

208 6.2.1 **Create Project Plan** - The first step in the procurement process phase is to
 209 create the project plan. The plan communicates a clear vision for project objectives and
 210 tasks, maps project resources and roles, organizes project-related work and defines
 211 goals, timelines and high-level budget. This document gives much needed structure to
 212 the project. See Table 1 for additional guidance on creating a project plan.

Task:	Guidance:
Define Project Scope and Goals	<ul style="list-style-type: none"> • Clearly outline what the project aims to achieve, what it will not achieve, and its boundaries. • Ensure goals are SMART (Specific, Measurable, Achievable, Relevant, Time-bound)⁴.
Identify Stakeholders and Roles	<ul style="list-style-type: none"> • List all stakeholders and define their roles and responsibilities and to whom they report.
Set Budget	<ul style="list-style-type: none"> • Estimate costs for resources, work, and contingencies. • Monitor and adjust the budget on an as needed basis.
Create Timeline and Schedule	<ul style="list-style-type: none"> • Break the project into tranches and set milestones. • Use tools to help visualize the timeline (Gantt Chart).
Outline Deliverables and Key Milestones	<ul style="list-style-type: none"> • Define what needs to be delivered and when.

⁴ <https://www.techtarget.com/whatis/definition/SMART-SMART-goals>

	<ul style="list-style-type: none"> • Ensure that deliverables are aligned with the project goals.
Plan for Resources	<ul style="list-style-type: none"> • Identify the resources (financial, human, material) required. • Ensure that resource availability aligns with the project timeline.
Communication Plan	<ul style="list-style-type: none"> • Establish how and when updates will be communicated to stakeholders. • Ensure clear and consistent communication channels.⁵
Quality Management	<ul style="list-style-type: none"> • Define quality standards and how they will be measured. • Implement regular quality assessments and reviews
Review and Adjust	<ul style="list-style-type: none"> • Regularly review project progress and make necessary adjustments. • Be flexible and responsive to changes.

213 **Table 1: Create Project Plan Tasks**

214 **6.2.2 Create Risk Management Plan** - The second step in the procurement
 215 process is to create a risk management plan. The risk management plan should include
 216 all potential risks related to each step of the procurement process. It should be all-
 217 encompassing, and it should be reviewed and updated on a regular basis. See table 2
 218 for additional guidance on creating a risk management plan.

Task:	Guidance:
Identify Risks	<ul style="list-style-type: none"> • Define potential risks that could impact the procurement.
Analyze Risks	<ul style="list-style-type: none"> • Evaluate the probability and impact of each risk.
Prioritize Risks	<ul style="list-style-type: none"> • Rank risks based on their probability and impact.
Mitigation Strategies	<ul style="list-style-type: none"> • Develop plans on how to reduce or eliminate risks, where possible.

⁵ Communications Strategy from 5.4 should be leveraged here.

Assign Tasks and Responsibilities	<ul style="list-style-type: none"> Designate stakeholders to manage each risk.
Monitor and Review	<ul style="list-style-type: none"> Regularly review and update the risk management plan.
Communication Plan	<ul style="list-style-type: none"> Ensure all stakeholders are regularly informed and updated about risks and their status.
Contingency Plans	<ul style="list-style-type: none"> Prepare plans for how to respond to risks should they occur.
Documentation	<ul style="list-style-type: none"> Keep detailed records of all risk management activities and keep these records up to date.⁶

219 **Table 2: Create Risk Management Plan Tasks**

220 6.2.3 **Business Case** - The third step in the procurement process is drafting the
 221 business case, which highlights how the agency will use FRT and details their needs.
 222 The business case forms the justification for the FRS and serves as the basis for
 223 following procurement phases. See Table 3 for additional guidance on drafting a
 224 business case.

Task:	Guidance:
Identity the Business Problem	<ul style="list-style-type: none"> Clearly define the issue that the project aims to address.
Outline Options	<ul style="list-style-type: none"> Present different options that can potentially solve the problem, including their pros and cons.
Recommend the Best Option	<ul style="list-style-type: none"> Justify why the chosen option is the most effective.
Executive Summary	<ul style="list-style-type: none"> Provide a brief overview of the business case that highlights key points.
Cost-Benefit Analysis	<ul style="list-style-type: none"> Detail the financial implications, including costs, benefits, and expected return on investment.

⁶ Risk Management Plan template examples: Risk Management Framework (RMF): Definition and Components (www.investopedia.com) and <https://csrc.nist.gov/pubs/sp/800/37/r2/final>

Risk Assessment	<ul style="list-style-type: none"> Identify potential risks and risk management strategies.
Implementation Plan	<ul style="list-style-type: none"> Outline the steps, timeline, and resources required to execute the project.⁷
Stakeholder Analysis	<ul style="list-style-type: none"> Identify key stakeholders as well as their role in regard to the technology.⁸
Performance Metrics	<ul style="list-style-type: none"> Define how success will be measured and monitored.
Conclusion	<ul style="list-style-type: none"> Summarize the key considerations and reiterate the recommendation.

225 **Table 3: Business Case Tasks**

225

226

227

228

229

230

6.2.4 Requirements Gathering - The fourth step in the procurement process is to turn the aforementioned business case into a set of requirements that can be clearly communicated to relevant stakeholders and used in the vendor solicitation process. See Table 4 for additional guidance on requirements gathering.

Task:	Guidance:
Clear Objectives	<ul style="list-style-type: none"> Ensure that the purpose of the project is clear and that the use case is well defined and understood.
Stakeholder Involvement	<ul style="list-style-type: none"> Engage with stakeholders to gather their requirements and expectations.
Specific and Measurable	<ul style="list-style-type: none"> Ensure requirements are detailed, specific, and measurable.
Prioritization	<ul style="list-style-type: none"> Rank requirements based on their level of importance.
Scope Definition	<ul style="list-style-type: none"> Outline what is included and excluded from the project. Be clear and concise.
Feasibility	<ul style="list-style-type: none"> Determine the technical and financial feasibility of the requirements.

⁷ Agency can leverage Project Plan (6.2.1) for this step.

⁸ Agency can leverage Project Plan (6.2.1) for this step.

Consistency	<ul style="list-style-type: none"> Maintain consistency in terminology, format and style throughout the document.
Traceability	<ul style="list-style-type: none"> Ensure that each requirement can be traced back to business objectives.⁹
Validation and Verification	<ul style="list-style-type: none"> Include methods for validating and verifying the requirements.¹⁰
Change Management	<ul style="list-style-type: none"> Establish a plan for how changes to requirements will be managed.

231 **Table 4: Requirements Gathering Tasks**

232

233 **6.2.5 Request for Information (RFI)** - The fifth step in the procurement process is

234 to conduct market research to determine potential technologies and vendors that may

235 meet agency requirements. This is done through a formal document and process

236 referred to as “Request for Information (RFI).” The RFI mechanism allows the agency to

237 “see what’s out there” and provides an opportunity to hear from vendors who think they

238 may be able to meet agency needs. See Table 5 for additional guidance on RFIs.

Task:	Guidance:
Objective	<ul style="list-style-type: none"> Define the purpose (e.g., law enforcement, access control).
Scope	<ul style="list-style-type: none"> Specify deployment areas and environments and explain use case.
Users	<ul style="list-style-type: none"> Identify primary users.
Technical Specs	<ul style="list-style-type: none"> Detail requirements pertaining to capture station, processing power, architecture (bare metal or cloud), algorithm(s) – FRT, image quality, presentation attack detection – and integration needs.
Accuracy	<ul style="list-style-type: none"> State required accuracy and performance metrics and ask vendors to provide

⁹ This can be achieved through a Traceability Matrix: <https://www.wrike.com/blog/what-is-requirements-traceability-matrix/>

¹⁰ Distinction between terms can be found here: <https://www.geeksforgeeks.org/differences-between-verification-and-validation/>

	evidence of claims on system accuracy and equitability.
Privacy	<ul style="list-style-type: none"> Outline requirements for data protection and compliance with privacy laws.
User Interface	<ul style="list-style-type: none"> Describe expected user experience.
Integration	<ul style="list-style-type: none"> Specify integration with existing systems.
Security	<ul style="list-style-type: none"> Define security requirements for technology, architecture, and employees.
Support	<ul style="list-style-type: none"> Detail maintenance and support requirements.
Cost	<ul style="list-style-type: none"> Provide budget range and request cost breakdowns.
Vendor Experience	<ul style="list-style-type: none"> Request case studies or references.
Compliance	<ul style="list-style-type: none"> Ensure compliance with industry standards.
Testing	<ul style="list-style-type: none"> Outline requirements around testing and evaluation process.
Timeline	<ul style="list-style-type: none"> Provide project timeline and milestones.
Demo	<ul style="list-style-type: none"> Consider vendor demos to give vendors the opportunity to show their products and explain how they can meet agency needs.
Contact	<ul style="list-style-type: none"> Include contact details for follow-up.

Table 5: RFI Tasks

239

240

241 **6.2.6 Request for Proposal (RFP)** - The sixth step in the procurement process is to
 242 put together a package that outlines the agency requirements and information gained
 243 from the Request for Information and solicit bids from interested vendors. See Table 6
 244 for additional guidance on RFPs.

Task:	Guidance:
Objective	<ul style="list-style-type: none"> Define the purpose for the procurement (e.g., to assist with identity management at the border).
Scope	<ul style="list-style-type: none"> Specify deployment areas and environments.

Users	<ul style="list-style-type: none"> Identify primary users.
Technical Specs	<ul style="list-style-type: none"> Detail camera resolution, volume, processing power, and integration needs.
Accuracy	<ul style="list-style-type: none"> State required accuracy and performance metrics. Make it mandatory that vendors provide evidence of claims on system accuracy and equitability.
Privacy	<ul style="list-style-type: none"> Outline privacy and data protection needs.
User Interface	<ul style="list-style-type: none"> Describe expected user experience.
Integration	<ul style="list-style-type: none"> Detail any required integration with existing systems.
Support	<ul style="list-style-type: none"> Define maintenance and support requirements.
Cost	<ul style="list-style-type: none"> Provide budget range and request cost breakdowns.
Vendor Experience	<ul style="list-style-type: none"> Request case studies or references.
Compliance	<ul style="list-style-type: none"> Ensure compliance with industry standards (ISO, ANSI/NIST, etc.).
Timeline	<ul style="list-style-type: none"> Provide project timeline and milestones.
Contact	<ul style="list-style-type: none"> Include contact details for follow-up.

Table 6: RFP Tasks

245

246

247

248

249

6.2.7 Vendor Evaluation - The seventh step in the procurement process is to evaluate bids that were received from vendors during the RFP process. See Table 7 for additional guidance on vendor evaluation.

Task:	Guidance:
Performance	<ul style="list-style-type: none"> National Institute of Standards and Technology (NIST) Face Recognition Technology Evaluation (FRTE)¹¹ results should be reviewed, at the very least. A combination of reviewing NIST results and

¹¹ <https://www.nist.gov/programs-projects/face-technology-evaluations-frtefate>

	testing on operational data would be preferred. If possible, evaluate false positive and false negative rates of the respective algorithm – in general and across different demographics (sex, skin tone, age).
Compliance	<ul style="list-style-type: none"> • Ensure the technology complies with relevant legislation and regulations, including those pertaining to ethics and privacy.
Security	<ul style="list-style-type: none"> • Assess the effectiveness of data encryption and storage solutions. • Review vendor methods for data breaches.
Scalability and Integration	<ul style="list-style-type: none"> • Determine if the technology can scale with agency needs. • Determine compatibility with existing agency systems and architecture.
User Experience and Support	<ul style="list-style-type: none"> • Evaluate the ease of use for end-users. • Consider the quality and availability of vendor support and training.
Cost and Licensing	<ul style="list-style-type: none"> • Determine the cost of ownership, including setup, support, maintenance, and possible enhancements. • Review licensing terms for flexibility and fairness.
Vendor Capability	<ul style="list-style-type: none"> • Research the vendor’s reputation in the market.¹² • Consider conducting site visits to observe the use of the algorithm or system and acquiring references.
Transparency and Accountability	<ul style="list-style-type: none"> • Ensure the vendor provides clear and concise documentation that shows transparency of their processes and methods. • Ensure that there is a mechanism for independent audits and assessments

Table 7: Vendor Evaluation Tasks

250

251

¹² This can be done via online searches for case studies or testimonials, but can also be done through discussions with partners that use the same vendor.

252 **6.2.8 Negotiate and Award Contract** - The eighth step in the procurement process
 253 is to select the winning bidder based on the vendor evaluation and to define contract
 254 terms. See Table 8 for additional guidance on negotiation and awarding the contract.

Task:	Guidance:
Scope of work	<ul style="list-style-type: none"> Clearly define deliverables, timelines, responsibilities, and overall expectations. Ensure project milestones and any performance metrics are detailed.
Pricing and Payment Terms	<ul style="list-style-type: none"> Negotiate total cost and payment schedule. Define any additional costs, such as support and maintenance fees.
Confidentiality and Security	<ul style="list-style-type: none"> Include clauses to protect intellectual property and protected or confidential information. Ensure compliance with security and data protection regulations.
Warranties and Liabilities	<ul style="list-style-type: none"> Define warranty coverage and conditions. Establish liability clauses – relating to losses or damage incurred by either party.
Contract Termination	<ul style="list-style-type: none"> Outline contract termination conditions specific to each party. Define adequate notice periods and any associated penalties or fees.
Dispute Resolution	<ul style="list-style-type: none"> Agree on a dispute resolution mechanism, such as mediation. Include references to governing law for legal matters.
Performance Standards and Penalties	<ul style="list-style-type: none"> Set clear expectations for performance standards and metrics. If possible, consider defining penalties for failure to meet agreed-upon standards.
Change Management	<ul style="list-style-type: none"> Establish procedures for handling changes to contract terms or work scope. Include provisions for contract amendments, timeline extensions, and cost adjustments.

Support and Maintenance	<ul style="list-style-type: none"> • Detail the level of support and maintenance services provided. • Specify expected issue response and resolution times. • Include specifications around algorithm upgrades throughout the lifetime of the contract.
Review and Approval Process	<ul style="list-style-type: none"> • Ensure a thorough review and approval by all relevant stakeholders.

255

Table 8: Negotiate and Award Contract Tasks

256

257

6.2.9 **Build** - The ninth step in the procurement process is to work with the new

258

vendor to build the FRS and integrate it into existing agency architecture and

259

processes, where needed. The business case and contract terms should be leveraged

260

here. See Table 9 for additional guidance on building.

Task:	Guidance:
Stakeholder Engagement	<ul style="list-style-type: none"> • Involve stakeholders from all relevant areas (IT, User Groups, Security, Legal, etc.).¹³ • Ensure that a feedback loop exists for stakeholders to voice their opinions and concerns during the build process.
Requirements	<ul style="list-style-type: none"> • Refine requirements around accuracy, including acceptable false positive and false negative rates and ability to adjust threshold. • Further define use case, such as security, access control, or customer identification.¹⁴ • Ensure that the system is built with specific agency use case in mind.
System Architecture	<ul style="list-style-type: none"> • Design for scalability to handle varying volumes of data and users.

¹³ Resource portion of Project Plan (6.2.1) can be leveraged here.

¹⁴ Agency can leverage work done in Planning Phase (5.1) here.

	<ul style="list-style-type: none"> • Ensure compatibility with existing security and IT infrastructure. • Consider building a pre-deployment testing environment to allow end-to-end testing before deployment.
Security and Compliance	<ul style="list-style-type: none"> • Implement strong encryption for data transmission and storage. • Ensure compliance with relevant legislation, regulations, and laws.
Data Quality and Bias Mitigation	<ul style="list-style-type: none"> • Use (or ensure that the vendor used) diverse and operationally relevant datasets to train the system and reduce bias. • Where possible, regularly audit the system for performance across different demographic groups.
Data Migration	<ul style="list-style-type: none"> • Plan for secure migration of existing data. • Validate data integrity and accuracy post-migration.
Testing and Quality Assurance	<ul style="list-style-type: none"> • Conduct extensive testing, including real-world scenarios (both common and uncommon). • Perform user acceptance testing to ensure the system meets user needs. • Validate end-to-end system performance prior to deployment.
Training and Documentation	<ul style="list-style-type: none"> • Provide training for end-users and administrators on FRS use and best practices. • Develop comprehensive documentation for system operation and troubleshooting. This is often in the form of user guides.
Change Management	<ul style="list-style-type: none"> • Prepare a change management plan to support user adoption and reduce the likelihood of resistance. • Communicate changes effectively to all stakeholders.
Performance Metrics	<ul style="list-style-type: none"> • Define key performance indicators (KPIs) such as recognition accuracy, processing speed, and user satisfaction.

Table 9: Build Tasks

262

263 6.2.10 **Deploy** - The tenth step in the procurement process is to deploy the new

264 FRS into production. See Table 10 for additional guidance on deployment.

Task:	Guidance:
System Configuration	<ul style="list-style-type: none"> • Ensure proper setup and calibration of hardware and software. • Verify successful integration with existing systems and infrastructure.
Data Security	<ul style="list-style-type: none"> • Ensure robust encryption for data storage and transmission is active and working as intended. • Ensure ongoing compliance with relevant data protection legislation and regulations.
User Training	<ul style="list-style-type: none"> • Complete any remaining or outstanding training for end users or system administrators. • Leverage easy-to-follow guides and documentation mentioned in Build step (6.2.9).
Privacy and Ethical Considerations	<ul style="list-style-type: none"> • Monitor that user consent and transparency in data usage policy and procedures are being followed. • Monitor that ethical considerations raised during the project planning and procurement phases of the project are being followed. • Address issues found during monitoring.
Monitoring and Support	<ul style="list-style-type: none"> • Ensure that appropriate resources (as defined earlier in the document) are assigned to system-related tasks. • Set up continuous monitoring for system performance and security. • Leverage support and maintenance agreement and related procedures to handle any bugs or issues post-deployment.
Feedback Mechanism	<ul style="list-style-type: none"> • Implement a system for collecting user feedback.

	<ul style="list-style-type: none"> • Use feedback to make necessary adjustments, improvements, and enhancements. • Feedback can also be obtained through audits or reports obtained from the pre-deployment environment.
--	--

265

Table 10: Deploy Tasks

266

267

6.2.11 **Review** - The last step in the procurement process is to conduct an analysis

268

of the success of the procurement process and subsequent deployment and use the

269

analysis to draft lessons learned. See Table 11 for additional guidance on reviewing.

Task:	Guidance:
Contract Compliance	<ul style="list-style-type: none"> • Ensure all contract terms and conditions have been met by both parties.
Performance Evaluation	<ul style="list-style-type: none"> • Assess the performance of vendor against key performance indicators (KPIs) and agreed-upon deliverables.
Cost Analysis	<ul style="list-style-type: none"> • Review costs incurred and compare them against the initial budget and forecast.
Quality Assurance	<ul style="list-style-type: none"> • Verify that the goods or services received meet the required quality standards.
Documentation	<ul style="list-style-type: none"> • Ensure all procurement documents are complete, accurate, and properly archived for future reference.
Stakeholder Feedback	<ul style="list-style-type: none"> • Gather feedback from all stakeholders involved to identify any issues or areas for improvement.
Lessons Learned	<ul style="list-style-type: none"> • Document lessons learned throughout the procurement process to leverage for and enhance future projects.
Final Payments	<ul style="list-style-type: none"> • Confirm that all necessary payments have been made as per contract terms.
Regulatory Compliance	<ul style="list-style-type: none"> • Ensure all procurement activities comply with relevant laws and regulations.

Project Closeout Report	<ul style="list-style-type: none"> • Prepare a detailed closeout report that summarizes the procurement process, outcomes, and any recommendations for future projects.
-------------------------	--

Table 11: Review Tasks

270

271

272 6.3 Outcome - At the end of this phase, by following the guidance above, the
 273 agency should have completed the procurement process, backed by strong
 274 foundational documentation, and in line with biometrics standards and best practices.

275 7. Ongoing Management

276 7.1 The goal of this phase is to ensure that the agency is well prepared to manage
 277 the new FRS on an ongoing basis. Ongoing management of the new FRS involves
 278 several tasks – namely: support and maintenance, performance measurement, and
 279 enhancements. This section of the document will provide an overview of these tasks,
 280 which will help the agency prepare for post-deployment activities.

281 7.1.1 **Support and Maintenance** - Ongoing support and maintenance is essential
 282 to ensuring that the FRS is functioning as intended and as was defined in the contract.
 283 Following deployment, the agency and the vendor must work together following the
 284 terms and conditions set out in the Support and Maintenance Plan that was established
 285 during the contract stage of the procurement process.

286 7.1.1.1 Ideally, the contract would permit 24/7 support, which would ensure that any
 287 bugs or issues are addressed immediately, regardless of time or day. In addition, the
 288 Support and Maintenance Plan should detail a clear and concise escalation process
 289 and a timeframe for fixes.

290 7.1.1.2 Procedural documents mentioned above should detail the process that
 291 different users need to take to identify a bug or issue, and a clear communication
 292 channel should also be established. In addition, architectural documents (both internal
 293 and vendor-related) should define and support bug and issue fix procedures.

294 7.1.2 **Performance Measurement** - Ongoing system and algorithm performance
 295 measurement helps the agency prove that the FRS is working as per the requirements
 296 set out in the FRS vendor contract. It also helps the agency prove that they are in
 297 compliance with facial recognition standards and best practice documents that stress
 298 the performance of “knowing your algorithm.” Where possible, the agency should strive
 299 to conduct ongoing performance measurement – either through the FRS vendor, or in-
 300 house. In addition, performance testing should be conducted using operationally
 301 relevant data and sample sizes. See Table 12 for additional guidance on performance
 302 measurement.

Task:	Guidance:
Regular Audits and Reporting	<ul style="list-style-type: none"> • Scheduling regular audits and reporting of system and user performance can help inform research needs. • Audits and reporting should become an ongoing task for the FRS business owner.
Accuracy and Reliability	<ul style="list-style-type: none"> • Ensure the system consistently identifies individuals correctly and minimizes false positives and negatives.
Bias and Fairness	<ul style="list-style-type: none"> • Regularly check for and mitigate any biases that may exist based on clientele (age, race, sex).
Security	<ul style="list-style-type: none"> • Monitor for vulnerabilities that could be exploited and ensure data protection measures are up to date.

Compliance	<ul style="list-style-type: none"> Stay aligned with evolving legal and regulatory requirements related to privacy and data protection.
Adaptability	<ul style="list-style-type: none"> Update the algorithm to handle new data and changing conditions effectively. Any algorithm upgrades should go through rigorous testing to ensure the new algorithm version meets agency requirements around accuracy, fairness, and speed.
User Feedback	<ul style="list-style-type: none"> Collect and analyze feedback from users to identify areas for improvement.
Performance Metrics	<ul style="list-style-type: none"> Track key performance indicators (KPIs) such as processing speed, accuracy rates, and error rates.
Scalability	<ul style="list-style-type: none"> Ensure the system can handle increased loads and larger datasets as usage grows.
Environmental Changes	<ul style="list-style-type: none"> Adapt to changes in the environment where the system is deployed, such as lighting or camera angles.
Ethical Considerations	<ul style="list-style-type: none"> Continuously evaluate the ethical implications of the system's use and its impact on society.

Table 12: Performance Measurement Tasks

303

304

305 7.1.2.1 These considerations help maintain the system's effectiveness, fairness,
306 and security over time.

307 7.1.3 **Enhancements** - Technology advances at a rapid pace, so the agency should
308 plan for enhancements – outside of bug and issue fixes – on a regular, and perhaps
309 even cyclical basis. Without the ability to enhance, the FRS will become outdated. See
310 Table 13 for a list of potential enhancements to consider.

Task:	Guidance:
-------	-----------

Software Updates	<ul style="list-style-type: none"> Regular updates to improve accuracy, security, and performance.
Hardware Upgrades	<ul style="list-style-type: none"> Enhancing capture equipment to improve image quality, enhancing processing equipment and workstations to improve research and user satisfaction/productivity.
Algorithm Upgrades	<ul style="list-style-type: none"> Frequent algorithm version upgrades to increase accuracy and reduce bias.¹⁵
Data Security	<ul style="list-style-type: none"> Strengthening data encryption and access controls.
User Interface Enhancements	<ul style="list-style-type: none"> Improving user experience and ease of use.
Compliance Updates	<ul style="list-style-type: none"> Ensuring the system meets new regulations and standards.
Training and Support	<ul style="list-style-type: none"> Providing ongoing training for users and support staff.
Scalability	<ul style="list-style-type: none"> Ensuring the system can handle more data, users, and new technology.
Integration	<ul style="list-style-type: none"> Enhancing integration with other systems¹⁶ and platforms.

Table 13: Potential Enhancements

311

312

313

314

315

316

317

318

7.2 At the end of this phase, the agency should be well-prepared to manage the new FRS in line with important standards and best practices and be confident that their use of FRT was implemented in a responsible manner.

FISWG documents can be found at: www.fiswg.org

¹⁵ The agency should use NIST FRTE results as a benchmark and test on operationally relevant data before upgrading.

¹⁶ Such as identity management systems, case management systems, or issuance systems.

319

ANNEX

320

(Mandatory Information)

321

A1. Biometric Performance Measurement Methods322 **A1.1**

Biometric Performance Measurement Methods	
1:1 - Verification	<p>Measures the performance of a FRT algorithm on the Verification task – one probe compared to a reference or other probe.</p> <p>Testing methods used:</p> <ul style="list-style-type: none"> • Determining False Match Rate (FMR) at a specific False Non-Match Rate (FNMR). • Confusion Matrix, Receiver Operating Characteristic Curve (ROC), Detection Error Trade-off Curve
1:N - Identification	<p>Measures the performance of a FRT algorithm on the Identification task – one probe compared to a database of reference templates.</p> <p>Testing methods used:</p> <ul style="list-style-type: none"> • Determining False Negative Identification Rate at a specific False Positive Identification Rate (FPIR). • Rank-Based Analysis - Cumulative Match Based Characteristic Curve (CMC).
Presentation Attack Detection	Refer to ISO/IEC – 30107-1 for performance testing methodology in this area.

323