

To: All Florida Policy Issuing Agents; All WFG Title Examiners and Officers

From: WFG Underwriting Department

Date: December 19, 2024 Bulletin No.: FL 2024-73

Subject: WFG will not rely upon biometric analysis to confirm the identity of a person executing a

document utilizing RON.

WFG will not rely on biometric analysis to confirm the identity of a person executing a document utilizing RON.

There are 2 parts to "prove" the identity of the signor when using remote online notarization (RON).

Part one is that the signor's credential i.e. driver's license or passport, must pass the Credential Analysis performed by the RON Platform.

Part two is for the signor to pass the knowledge based authentication ("KBA") questions. RON platforms are able to produce KBA questions for persons with a SSN and credit history in the USA since RON platforms produce the KBAs questions from information deriving from credit reporting companies. However, if a party wanting to sign before a RON does not have a SSN or credit history in the USA (such as a foreign person), the RON platforms cannot produce KBA questions.

As to part two of proving the identity of a signor, WFG will only allow a signer to have their identity confirmed by passing the KBA questions or (if the RON Platform cannot create KBA questions) WFG may accept an Affidavit of Identity in lieu of KBA questions by a person from WFG's approved categories of persons who can sign an ID Affidavit and ONLY upon written approval from WFG Underwriting.

WFG will not rely on biometric analysis in lieu of KBA questions or an Affidavit of Identity (even if the WFG approved RON platform has biometric analysis as an option).

<u>Click here for WFG's requirements to use RON for foreign signors where KBA Questions cannot be produced by the RON Platform.</u> These requirements apply equally to foreign signors and US citizens where KBA Questions cannot be produced by the RON Platform. <u>Click here for a copy of WFG's form of Identity Affidavit.</u>

NOTE: The information contained in this Bulletin is intended solely for the use of employees of WFG National Title Insurance Company, its title insurance agents and approved attorneys. Disclosure to any other person is expressly prohibited unless approved in writing by the WFG National Title Insurance Company's Underwriting Department.

The Agent may be held responsible for any loss sustained as a result of the failure to follow the standards set forth above.