

# Initial Public Meeting of the Information Sharing and Analysis Organization (ISAO) Standards Organization November 9, 2015

## “The How”: ISAO Standards Working Groups Executive Summary and Minutes of Breakout Sessions

**Background:** The objective of these sessions was to identify capabilities, criteria, processes and strategies for future ISAO SO Standards Working Groups operation. After a brief presentation from the breakout session moderator, participants in the session split into four groups. Each group considered/discussed two or three questions in four topic areas and captured input in a brainstorming style environment. The participants’ documented their individual and group comments for each of the four topic areas onto adhesive notepads and placed these comments on topic area charts around the room. Each group then summarized the totality of comments on their initial topic area, prioritized these comments and briefed the findings to the larger group.

Four topics included Standards Development Process, Standards Working Group Formation, Composition, and Collaboration.

**Synopsis:** After an initial presentation, participants of each breakout session broke into four similarly-sized groups and started brainstorming each of the four topics. The moderator and facilitator moved through the groups offering clarification when needed and encouraging respondents to deviate from the topic if warranted. This was repeated for each session with similar interactions between the moderator, facilitator and participants.

After 9 minutes, the groups rotated to the next section to answer a set of questions related to a new topic. After the rotations were completed, each group was asked to review all the answers at their initial section and select a group leader to present the three or four “best” responses to each question.

### The “How” Focus Area 1: Standards Development Process

**Needs:** Well documented deliverables and milestones; A process to facilitate public comment consideration; “Strawman” documents for easy of starting; In-Person meetings with non-penalty if virtual attendance is only possible.

**Suggestions:** Incorporate public comment periods into the standards developing process; Make the work of the working group fully transparent to eliminate the need of a public comment period; Set due dates for edits and provide strawman templates; Provide a well-defined decision making process; Use a common lexicon such as “NIST IR 7298 Revision 2, Glossary of Key Information Security Terms”; Draw from existing Standards Development Organizations structures; Provide a mechanism for document and version control; Require milestone



reporting to the SO; Consider exclusion of elements where consensus cannot be reached to expedite a partial solution.

### **The “How” Focus Area 2: Standards Working Group (SWG) Formation**

**Needs:** Developing solutions for higher order goals; Building institutional (core) knowledge; Opportunities for broad topics to have attention focused on them; Sharing resources and building trust; on time and resources and the ability to build trust; Ensuring transparency; Allowing for expert involvement in finite increments; When complexity requires significant interaction among participants; Fostering in-person meeting opportunities.

**Suggestions:** Enduring SWGs are better when you want to develop solutions for higher order goals and at fostering initial trust relationships when needed, when building institutional (core) knowledge and to have to have a significant level of ownership regarding transparency and trust. Subset groups were seen as fostering productivity when particular technical expertise is needed, the complexity level will require significant time or there is a benefit to having a geographic subgroup to speed up the deliverable; Sector, legal or other narrowly focused sub groups may function better to promote the trust and foster collaboration.

### **The “How” Focus Area 3: Standards Working Group Composition**

**Needs:** Confidence or trust in fellow group members; Prevention of foreign interests; Participation based on expertise; Fostering of decorum; Exclusion based on cyber related criminal background and violation of publicly available participation standards; Avoiding ‘stacking the deck’ with similar or organizationally linked individuals.

**Suggestions:** Accept group members based on expertise, positive attitude, team player traits, with a willingness to work, and flexible; Provide a solid process and structure known in advance can foster SWG productivity and transparency, Select leaders with a track record of ‘leading’ and team building; Instill accountability in the members.

### **The “How” Focus Area 4: Standards Working Group Collaboration**

**Needs:** In-person meeting should not be a requirement to be an active member; Limit in-person meetings to initial and contentious issues, establishing rapport with group or addressing contentious issues; Participation of Subject Matter Experts may require in-person meetings for knowledge transfer; Inconsistent schedules limit participation; Conference calls are difficult with more than about 30 participants; Allowance for proxy voting.

**Suggestions:** Predictability is the key to participation; Promote the use of collaboration tools without real-time interaction requirements; Limit email for large groups in favor of online forums in order to promote idea sharing; Use a count-down or ‘shot clock’ to encourage action by a certain deadline; Hold SWG meetings along with plenary sessions.



## “The How” Standards Working Groups Breakout Session Capture of Best Practices/Challenges/Issues/Ideas/Concerns

The information below fully captures the information provided by participants during the ISAO Standards Working Groups Breakout Sessions at the November 9, 2015 Open Forum.

“The How” Session	Type	Text
Standards Development Process	Suggestion	Standards Development Process could end with the SCC (Information Sharing Standards Coordinating Council) receiving or posting the products? Moderator Comment: I received this from the author, "My note on the Standard Coordinating Council (SCC) was to ensure that the ISAO Standards Working Group was aware of the organization and promote opportunities for the two to work together. If you all are unfamiliar with the SCC, please take a look at this link on PM-ISE's website: <a href="https://www.ise.gov/standards-coordinating-council">https://www.ise.gov/standards-coordinating-council</a>  “The SCC organization represents a range of public and private sector groups who might one day be in a position to advance the ISAO mission.”
Standards Development Process	Question	When do we work with International Organizations working on the same topics?
Standards Development Process	Question	"Who are the experts who are not already in the room". Moderator Comment: This comment appears to reference the 'Expert Independent Advisors' and may be addressed with the ISAO clearly defining the how this group is configured.
Standards Development Process	Suggestion	The SWG needs a method of handling polarized positions
Standards Development Process	Suggestion	The SWG needs a "draft final or revision step". Moderator Comment: This appears to stem from the Develop ISAO Standards Box that is not does not define the steps it is comprised of.
Standards Development Process	Suggestion	"Define the process for voting and reviewing standards."
Standards Development Process	Suggestion	Needs a defined adjudication process so commenters know their comments are received and considered.
SWG Composition	Question	Is there a fee to be a SWG Member?
SWG Composition	Suggestion	2 Tiers are fine, but voting members must have a vested interest.
SWG Composition	Question	"Why is the ISAO SO deciding on all the Leadership?" Shouldn't it be up to committees themselves?
SWG Composition	Question	"Is it feasible to have unlimited SWG General Membership?"
SWG Composition	Question	"Why are positions ISAO SO Approved?"
SWG Composition	Question	What does ISAO SO Approved mean?
Standards Development Process	Suggestion	Make SWG Meeting Minutes published and open to all as well as deliverables.

Standards Development Process	Comment	Comments from the public need to be filtered to remove 'chatter' before consideration by the body.
Standards Development Process	Question	Who are the "Expert Independent Advisors"?
Standards Development Process	Question	Are Public Comments allowed to be anonymous?
SWG Collaboration	Comment	In-Person Meetings-- Should not require in-person meeting to be an active member.
SWG Collaboration	Comment	In-Person Meetings should occur when-- 1) Initial and contentious issues: Establishing rapport with group Addressing contentious issues 2) Special Protection: Legal or administrative issue 3) No in-person meeting: Only have quarterly or annual meetings 4) Development areas: SME to address areas 5) Developing trust – then bi-monthly or monthly
SWG Collaboration	Comment	In order to collaborate quickly-- 1) Allow for external work to occur that can then be voted on quickly 2) Work from a 'strawman' to reduce ramp-up time 3) Define 'consensus' upfront 4) Notification alerts for members 5) Require consistent membership 6) Staff the SWG based on expertise 7) Provide a structured, secure workspace for documents
SWG Collaboration	Comment	Tools for fostering participation-- 1) Predictability 2) Tools – broad diversity of tools mentioned – need to consider very carefully 3) A mechanism for contributing suggestions (anonymously) 4) One vote only for final decision
SWG Formation	Comment	SWG Subset group-- 1) Needed when particular technical expertise is needed 2) When the complexity level will require time 3) Based on size and efficiency – smaller groups may not need a sub group 4) If there is a benefit to having a geographic subgroup to speed up the deliverable 5) If the topic at hand is Sector related or Legal related, or some other sub group 6) It is established and advertised as reporting back to the larger work group
SWG Formation	Comment	Enduring SWGs are better for-- 1) When you want to develop solutions for higher order goals 2) When building institutional (core) knowledge 3) If the broad topic has an enduring track record for a long time 4) If it has feeder groups 5) Based on time and resources and the ability to build trust 6) Have to have a level of transparency/trust 7) Need of working group should dictate, perhaps build trust
SWG Composition	Comment	Conditions that should disqualify someone-- 1) Not passing some degree of a background check 2) Foreign entity 3) Conflicts of interest
SWG Composition	Comment	Conditions that should disqualify someone from continued membership-- 1) Non-Productive 2) Someone not meeting timelines 3) Anyone who chills the conversation and stops someone from participating in an active manner 4) Conduct code of ethics violation 5) No longer meeting ISAO requirements

SWG Composition	Comment	Balance openness, participation timely consensus-based decision making-- 1) Public meeting 2) Documented Meetings (Transparency) 3) E-vote 4) No side/backdoor meetings 5) Right leadership 6) Schedules, milestones, deadlines 7) Need for participatory progress that clears ways for incentive 8) Clearly articulated mission
SWG Composition	Comment	Criteria for SWG Leaders and Members-- 1) Leader- Able to build consensus, Promoting diversity, Accountable 2) Group Member- Flexibility, Expertise, Positive Attitude, Team Player, Willing to work
Standards Development Process	Comment	Building a good process-- 1) Should function as an organization 2) SWG with clear scope and charter 3) SWG with clear timelines, goals, and objectives 4) Develop relationship that initiates (promotes) trust
Standards Development Process	Suggestion	ANPR Advance Notice of Public Rule Making A) RFC: Allow time 6-10 weeks. Email, website, press release, federal register, twitter, slack channel
Standards Development Process	Suggestion	B) Draft of Standards: Use NIST approach for communicating and publishing draft. PCIs/SCCs. Use line numbers in documents. Template for comments. Strict process for reviewing comments.
Standards Development Process	Suggestion	C) Approved standards: Use federal register?, pick one place and advertise, same as RFCs and drafts, sector coordinating councils, NIST, push technology: email/twitter
Standards Development Process	Suggestion	Consider developing a mobile app for ISAO SO effort
Standards Development Process	Comment	Drafts standards development process issues, lack of follow up, not getting Buy In from group, lack of efficient collaboration, lack of participation, differing schedules of participants, leadership, administrative delays, issue document control, goal too broad, nonstandard terminology, SWG leadership changes, intellectual property rights not defined, too many revision periods, need solid definition on consensus, lack of trust, delays in member feedback, weak leadership, legal constraints?, political agendas, public comment period too lengthy, too many view points for effective collaboration, flexible timelines, comment adjudication, comments without solutions,
Standards Development Process	Suggestion	Drafts standards development process solution, collapse the working group and public comments - make the work of the working group fully transparent to eliminate the need of a public comment period, set due dates for edits, provide strawman templates, shorten public comment periods, independent advisors can include legal experts, a way to reward participants, well defined decision making process, common lexicon, draw from existing standards (structure/content), document and version control, milestone reporting to the SO, SWG can exclude elements where consensus cannot be reached?, a "good" solution with consensus is acceptable,

Standards Development Process	Suggestion	Working Group Collaboration, initially to establish trust, highly sensitive issues, annually, when significant roadblocks arise, in person meetings limit participations, when determining consensus, consider video chat as a replacement to in person, for effective decision making, quarterly?, depending on scope of topic, more in person meetings at the start of the SO, during leadership transition?, called by leadership to address issues, in person attendance optional, use collaboration tools instead, possibly when SME involved, if/when CIPAC FACA waiver protection is needed, HUMM ( <a href="http://www.hummsystems.com/">http://www.hummsystems.com/</a> )
Standards Development Process	Comment	Collaborating Quickly Issues, untrusted workspace, lack of trust, new members slow the process down, in person too slow, poorly defined processes, process and templates too cumbersome, poor management, external advisors participate too late in process, communication not pushed, participants not qualified
Standards Development Process	Comment	ANPR - An Advance Notice of Proposed Rulemaking (ANPRM) is a document that an agency may choose to issue before it is ready to issue a Notice of Proposed Rulemaking (NPRM). It may also be called a "notice of intent" or simply a "request for comments." The ANPRM is used by an agency as a vehicle for obtaining public participation in the formulation of a regulatory change before the agency has done significant research or investigation on its own. Thus, one of the primary uses of an ANPRM is to involve the interested public in a regulatory action at an early stage, before the agency has arrived at even a tentative decision on a particular regulatory change.  "Rather than issue formal rules and provide a period of public commentary, the CFPB took a different approach. The ANPR was a request for information by way of seeking responses to 450 enumerated questions and sub-questions, which covered the following areas:"
SWG Collaboration	Suggestion	for productivity: Select members based on expertise, provide secure portal, collaboration space like Slack
SWG Collaboration	Suggestion	Start with a successful process: use a shot clock to count down time remaining for action, Silence means consent, Plan to have SWG meetings in tandem with Plenary sessions
SWG Collaboration	Suggestion	Method for better collaboration: Solid schedules, Secure portal, conference calls, Do what SGIP did, use Trelle or other flexible idea tools, UTSA Internship to support,
SWG Collaboration	Suggestion	Think about NCOIC, portal with compartmentalization by topic, Email in a large group can limit idea sharing - consider online forum,
SWG Collaboration	Suggestion	use go-to-meeting, Google Hangouts, mobile app for collaboration on the run, keep transparency, treat all vetted member comments with equal weight, minimize conference calls where more than 30 people are present,
SWG Formation	Suggestion	Small groups or sub-working groups are needed when expertise is needed, topic is relatively small, maybe sensitive topics, and perhaps sub-groups should be stood up as needed under the SWGs
SWG Formation	Comment	A SWG may create a Sub-SWG in order to encourage members to be productive (they cannot hide as easily), perhaps when an unique approach is needed for perhaps a highly technical or contentious topic, This could be a geographical issue when face-to-face meetings are chosen,
SWG Formation	Question	Would Sub-Working Groups ever have issue elements such as legal or privacy? Do they just get more specific or can they get broader?



SWG Collaboration	Comment	You need clear objectivism good leadership and transparency of process
SWG Collaboration	Suggestion	Allow vote by proxy, allow anonymous information sharing
SWG Composition	Suggestion	A solid process and structure known in advance can foster SWG productivity and transparency, Have a small group create draft and let the rest comment.
SWG Composition	Comment	No one will volunteer for Secretary position, Co-Chair is better than the title 'Vice-Chair'
SWG Composition	Comment	Membership should be limited based on foreign interests, lack of expertise, lack of decorum, cyber-criminal background, sector focused participation, violation of publicly available standards.
SWG Composition	Comment	disqualifications of members my stem from conflict of interest, ethics violation or disruptive behavior, anyone can join, but only us citizen can vote, Consider ANSI rules for censure, Lack of participation, Some suggested minimal vetting is needed if work is transparent.
SWG Composition	Comment	All should be allowed to be in the SWG. We can learn from even a foreign person.
SWG Composition	Comment	Leadership qualities, experience in the subject, track record , for fairness, Previous information sharing experience.
SWG Formation	Comment	large broad topic SWGs fosters continuity of knowledge
SWG Formation	Comment	Time builds Trust, Broad topics more helpful in the beginning, Consider EO sections 4A and 4B information sharing for clues.
SWG Formation	Comment	Have a large group with TigerTeam that tackle smaller issues. Long term groups still need to accept new members periodically.
SWG Formation	Comment	It is assumed that the governance of the ISAO-SO will dictate the long and enduring SWGs or short lived ones, topics should be narrow enough to be do-able.