January 15, 2018

Dr. Gregory White
Executive Director
ISAO SO

Dr. White,

The National Health Information Sharing and Analysis Center (NH-ISAC) thanks the ISAO SO for the opportunity to comment on the issue of certification.

The NH-ISAC, which was formed in 2010, has a mission to enable and preserve the global public trust by advancing health sector cyber and physical security protection and the ability to prepare for and respond to cyber and physical threats and vulnerabilities. The ISAC in a relatively short period of time has grown to a respected, successful sharing community that is driving ground-breaking initiatives in information sharing and cybersecurity.

As someone who has personally participated in information sharing for several decades, has served in leadership positions in two very strong ISAC communities - Financial Services (FS-ISAC) and now Health, and has mentored many ISACs and ISAOs in how to form sharing communities, I can definitely say that certification does NOT EQUAL TRUST.

When I served as chair of the ISAO SO Working Group 2: ISAO Capabilities, which created the initial description of potential services an ISAO could offer, the group repeatedly stated stakeholders will go where they find VALUE. The value could be cost, actual collaborators/relationships, and services offered among other things. Certification is a strong word with strong connotations. Certification is compliance and as we all know compliance does not equal security nor does it equal value. If a stakeholder does not find value, then he/she will determine their actions regardless or not if and organization is "certified".

The ISACs and now ISAOs have been successful because information sharing is voluntary. Members of a community share because they *want* to share with each other. The fact that a regime may force certification on a community could effectively kill information sharing and essentially all of the hard work industry has undertaken in the almost 20 years ISACs have existed.

National Health Information Sharing and Analysis Center
State Road 405 - Building M6-306
Kennedy Space Center, FL 32899

Successful sharing organizations have processes in place that help build trust such as legal constructs, sharing infrastructure, the traffic light protocol - used globally to provide the originator of information to determine with whom and how information can be shared - and providing networking opportunities to build relationships amongst stakeholders.

Rather than try to force organizations to meet some arbitrary check box to 'prove' they are trustworthy or capable, the SO can assist those stakeholders who wish to form sharing communities in refining and publishing guidelines to develop services stakeholders will value and that engender trust, hosting workshops with relevant agendas for learning and creating sharing cultures, and fostering mentoring relationships with those communities who have demonstrated success among other things.

Certification is absolutely the wrong approach. Ultimately the members of a community *will* decide and *should* decide its success or failure. I strongly encourage the SO to drop the pursuit of certification and instead focus on ways it can help foster the success of existing and future ISAOs.

Sincerely,

Denise Anderson
President and CEO
NH-ISAC

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