



January 15, 2018

Dr. Gregory White
Executive Director
ISAO SO
Greg.White@utsa.edu

Dear Dr. White:

The Water Information Sharing and Analysis Center (WaterISAC) appreciates the opportunity to respond to the ISAO SO's December 2017 solicitation for a discussion on ISAO certification.

The information sharing and operational arm of the Water Sector Coordinating Council, WaterISAC was authorized in the Bioterrorism Preparedness and Response Act of 2002. WaterISAC provides vital physical and cyber security information and emergency response resources to hundreds of drinking water and wastewater utilities in the U.S., Canada and Australia. Most of the U.S. population is served by a WaterISAC member utility.

WaterISAC recognizes the value of the work of the ISAO SO. Its many guides provide very useful resources about the establishment and operation of information sharing and analysis centers/organizations. WaterISAC's Michael Arceneaux was a core member of the ISAO SO working group on services and capabilities, and we look forward to the development of additional guides.

However, we have serious objections to an ISAO certification program. First, a certification program at this point in the nascent ecosystem of ISAOs would be highly premature. Voluntary standards development and non-government certification are generally the products of an expression of need by the community they pertain to. The community in this case comprises existing sector-based ISACs and a handful of ISAOs, and community support for the concept of certification is by and large absent. In fact, at a large gathering of stakeholders convened by the ISAO SO in September 2016, the vast majority of the room voted down the development of a certification program. Until there is a much larger community of ISACs and ISAOs with the majority of them calling for certification, the SO has no mandate to pursue the concept.

Second, WaterISAC believes it is inappropriate for a federal government grantee or contractor to pursue a certification program with federal dollars without an authorizing statute. Any certification program formed by the SO with federal dollars smacks of federal government regulatory oversight of the ISAC/ISAO community. Not even the Executive Order directing the establishment of the SO (EO 13691) authorized the pursuit of certification.

The third reason we oppose certification is that there are no standards on which to base such a program. The products of the SO are guides - guides developed not via a broad-based community

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of stakeholders, but by relatively small working groups. And the recent draft of ISAO 200-1, Foundational Services and Capabilities, was developed by just a few individuals.

Looking at the language of the solicitation, it seems clear that the SO does not genuinely embrace the concept that an ISAO's services and capabilities should be determined by the needs of its members. In lines 27-33 and 44 of the solicitation, the SO clearly asserts that ISAOs must perform all five foundational services and capabilities. This contradicts ISAO 100-2, which states that an ISAO need not engage in all five services and capabilities to be an ISAO, and it makes one suspect that the SO is ultimately driving toward prescriptive standards.

ISAOs should be – first and foremost - responsive to the needs of their members. A certification program undermines that fundamental approach by virtually forcing ISAOs to offer services and capabilities that the SO deems necessary. Certification inherently involves meeting minimum requirements, and the requirements should be set by members, not the SO.

Any of the reasons above is more than sufficient rationale for the SO to set aside its pursuit of certification.

Certification and Trust

In the solicitation, the SO asks three questions around how prospective ISAO members and partner organizations can determine whether an ISAO is trustworthy. The only answer is that trust must be earned. Certifying trust is obviously fiction. One option offered is self-certification, but by facilitating self-certification, the SO could end up endorsing unverifiable claims and harming consumers. The other option offered is third-party certification. While third-party certification would be more rigorous, it would only tell part of an ISAO's story.

Related, for a third-party certification to be meaningful, the program would need to be fairly specific in its assessments, and certified ISAOs would need to be reassessed regularly. Not only would this be very invasive and negatively disruptive, but it would be costly to the parties being assessed.

Trust must be earned over time and organically. For instance, if an ISAO warrants trust, its current members should be willing to declare their support for the organization to prospective members. In terms of earning the trust of partner organizations, that is best achieved through the participation of ISAO personnel and members in the information sharing community. Through their relationships, ISAOs can build reputations that garner trust.

Awareness about ISAO's Offerings

The SO also asks commenters about how certification could help prospective ISAO members learn about ISAOs' services and capabilities and compare offerings between ISAOs. Certification is not necessary for ISAOs to explain their services to stakeholders. Further, if the means for prospective members to compare the offerings of ISAOs is a certification program,

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then you risk leaving out ISAOs that choose not to participate in such a program. Non-participants, despite providing the services their communities have asked for, would be relegated to second-class by the SO.

Alternatives

The SO also asks for alternatives to certification to help develop trust and advance awareness of ISAOs offerings. The primary alternative is to let the market decide whether an ISAO is trustworthy or offers the services necessary to its members. However, the SO can facilitate trust and awareness by hosting forums and workshops. These can educate consumers about ISAOs, introduce ISAOs to prospective consumers, facilitate relationship building among stakeholders and help ISAOs themselves evolve and mature.

The SO could also develop materials for consumers about the concept of and value of ISAOs. It could also expand the ISAO listings on its website to include more information about each ISAO's services, with a disclaimer, of course, that the SO has not verified the claims of the ISAOs listed.

We strongly urge you to carefully consider our comments and recommendations and make a determination to set aside the pursuit of certification.

Thank you for soliciting our views. Please contact Michael Arceneaux at 202-331-0479 or arceneaux@waterisac.org with any questions.

Sincerely,



Diane VanDe Hei
Executive Director