The Honorable Karen S. Evans  
Administrator E-Government and  
Information Technology  
The Office of Management and Budget  
725 17th Street, NW  
Washington, DC 20503

Dear Ms. Evans:

I am writing to you as the Chair of the Information Security and Privacy Advisory Board (ISPAB). The ISPAB was originally created by the Computer Security Act of 1987 (P.L. 100-35) as the Computer System Security and Privacy Advisory Board, and amended by Public Law 107-347. The E-Government Act of 2002, Title III. The Federal Information Security Management Act of 2002. One of the statutory objectives of the Board is to identify emerging managerial, technical, administrative, and physical safeguard issues relative to information security and privacy.

During its public meeting of December 6 and 7, 2007, the Board received an informative briefing on the Information Security Essential Body of Knowledge (EBK) project being managed by the National Cyber Security Division of the Department of Homeland Security. The stated purpose of this effort is to provide a national competency baseline for IT security practitioners, thereby ensuring that the nation has a well-qualified IT security workforce.

In reviewing this program the board agreed that the framework proposed in the draft EBK document may not be appropriate for achieving the worthy concept underlying this program. Several private sector activities are addressing security practitioner competencies.
Potential redundancy with existing efforts, as well as the lack of any formal, direct communication with existing private sector certification bodies during the development of this draft document, was viewed with concern by the Board. The Board also noted that one certification body had expressed concern in its comment on the draft EBK document that it was not accompanied by any implementation plan, or other type of contextual document, that would provide any guidance on how the EBK document would be used by DHS or other government agencies to promote the project's stated goals.

The Board recommends that the EBK program be given close scrutiny by OMB and DHS.

Sincerely,

Daniel J. Chenok
Information Security and Privacy Advisory Board Chairman