June 21, 2013

Dr. Patrick Gallagher  
Under Secretary of Commerce for Standards  
and Technology  
Director, National Institute of Standards and  
Technology  
Gaithersburg, MD

Dear Dr. Gallagher:

I am writing to you as the Chair of the Information Security and Privacy Advisory Board (ISPAB or Board). The ISPAB was originally created by the Computer Security Act of 1987 (P.L. 100-235) 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 (FISMA) of 2002. The statutory objectives of the Board include identifying emerging managerial, technical, administrative, and physical safeguard issues relative to information security and privacy.

At the Board’s June 12-14, 2013 meeting, we reviewed the progress of the NIST Cybersecurity Framework as required by the President’s Executive Order (EO) on Improving Critical Infrastructure Cybersecurity. We applaud the leadership of the White House, NIST and DHS in driving improvements in national critical infrastructure cyber security through promulgation of Executive Order 13636 and the NIST Cyber Security Framework process. We note that the first two Cybersecurity Framework workshops conducted by NIST in Washington and Pittsburgh generated considerable positive energy among many industry and academic sector representatives.

In that spirit, we see an opportunity to leverage the important private sector outreach and engagement conducted under the National Infrastructure Protection Plan (NIPP). The Presidential Directive recognizes this in its call for review of the NIPP partnership.
Upon discussion with NIST, DHS and various participants, we believe that the NIST Framework can leverage NIPP’s existing work and structure, while also identifying places for improvement of the partnership that can be addressed by DHS.

Specifically, 17 industry sector coordinating councils (SCCs) and government coordinating councils have developed substantial plans in this space which should be considered as part of the Cybersecurity Framework process. NIST has done tremendous work in attracting and including cross-sector subject matter experts in the workshop process. The targeted inclusion of SCCs will help to not only broaden the results of the Framework, but also serve to refresh and potentially accelerate the enhancement of the NIPP public private partnership and bring a higher standard of security for our critical infrastructure.

The ISPAB recommends that NIST, DHS, and the sector agencies specifically engage the leadership of NIPP SCC’s and GCC’s to leverage the existing Sector Specific Plans (SSPs) in the creation of the Framework. The ISPAB continues to support the President’s efforts to improve cybersecurity and the implementation of the Executive Order.

Sincerely,

Matt Thomlinson
Chair
Information Security and Privacy Advisory Board

cc. Dr. Willie E. May, Associate Director for Laboratory Programs