



625 N Washington Street, Suite 400
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ISC2.org

June 9, 2025

Dr. Jill Bryant, OD
Executive Director National Board of Examiners in Optometry (NBEO)
200 S. College Street, #2010
Charlotte, NC 28202
USA

Delivered Via Email

Dear Dr. Bryant:

Thank you for the recent conversation and the invitation to discuss the significant risks associated with online/remote proctoring.

ISC2 is the world's largest and oldest non-profit member organization for cybersecurity professionals, driven by our vision of a safe and secure cyber world. Our award-winning certifications – including cybersecurity's premier certification, the CISSP® – enable professionals to demonstrate their knowledge, skills and abilities at every stage of their careers. Our more than 265,000 certified members, and associates lead the profession with the same shared vision.

Due to the highly valuable nature of our exam content and our global ANSI/ISO/IEC 17024 accreditation status, ISC2 has traditionally utilized the most secure exam delivery available in the commercial assessment marketplace. Since moving to Computer-Based Testing (CBT) in 2009, ISC2 has partnered exclusively with Pearson VUE, the market leader for examination delivery. Furthermore, ISC2 has been the industry leader in examination security. We have a duty to ensure all ISC2 credential holders – now and in the future – who have invested time and resources to prepare for and pass an ISC2 examination can trust that their certification will maintain its value for the long term. We cannot and will not create any doubt about the integrity of our exam process and the qualifications of those passing our examinations.

Under no circumstances has ISC2 ever utilized any form of online proctoring. To be clear, there are at least two significant risks associated with online proctoring. The first risk is the ability for individuals to utilize unauthorized aids during an exam to help them pass when they otherwise would not; and the second risk is the ability to remove exam content in part or total from an uncontrolled physical environment during online delivery. The loss of an exam form or item pool could lead to a breach declaration and potentially to mass invalidation of results.

A safe and secure cyber world



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As the leader in cybersecurity qualifications, ISC2 has conducted two online proctoring pilot examinations. Each pilot, utilizing the latest examination delivery and security technology, resulted in a complete loss of the examination form and invalidation of results for most candidates. At this time, there is no delivery technology that ameliorates the cybersecurity and criminal risks associated with online proctoring. Despite promises of convenience, online proctoring is not fit for high stakes examination programs; certainly not for examination programs where public health or safety is paramount.

To ensure the highest level of integrity in our examination results, ISC2 enforces a stringent security posture – especially when evaluating candidates’ testing environments, whether it be center-based or online. We constantly monitor and test the environment and provide evaluations of suspicious and fraudulent activity; when we do see something, action is taken. For these reasons ISC2 would recommend against any licensing agency substituting an exam delivered in a secure testing center with an exam delivered online. NBEO is welcomed to share this letter with lawmakers and policy makers.

Sincerely,

A handwritten signature in black ink, appearing to read 'Casey Marks'. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Casey Marks, PhD, CAE
Chief Qualifications Officer

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