

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: NIST CSF 2.0 Draft Released for Public Comment - ED Comments
Date: Monday, November 6, 2023 4:19:01 PM

Hello NIST –

Please find our comments for DRAFT NIST CSF 2.0 below:

1. The current version published CSF (1.1) does not provide CSF parameters for all controls within the 800-53 security and privacy control catalog. Would it be possible to request that all security and privacy controls and enhancements have a CSF mapping (understanding that you cannot have privacy without security), and all privacy controls at least have PF parameters to include all controls and enhancement within the Privacy Baseline? Additional guidance is requested as to whether all security controls should affect the PF. Any additional guidance tracing the connectivity between these would be beneficial and greatly appreciated.
2. Would it be possible to request that CSF 2.0 have traceability to late breaking Government wide guidance (e.g., EDR, M-21-31, Supply Chain Risk Management) or a potential online tool that would be expanded as new directives/memorandums are released? We realize somethings might be too “late breaking” but in cases where it is feasible, it would be beneficial.

Thank you for your time and allowing us to comment!

V/R

The IAS Governance Team

[REDACTED]