EDUCAUSE

VIA ELECTRONIC SUBMISSION: cyberframework@nist.gov

February 9, 2016

Diane Honeycutt
National Institute of Standards and Technology
100 Bureau Drive
Stop 8930
Gaithersburg, MD 20899

Re: Comments in Response to the National Institute of Standards and Technology's Notice, Request for Information, "Views on the Framework for Improving Critical Infrastructure Cybersecurity," Docket ID 151103999-5999-01, Published on December 11, 2015, Federal Register (80 FR 76934)

Dear Ms. Honeycutt:

EDUCAUSE respectfully submits these comments to the National Institute of Standards and Technology (NIST) in response to the above-referenced Request for Information (RFI), published in the *Federal Register* on December 11, 2015, at 80 FR 76934.

EDUCAUSE is a non-profit association and the foremost community of information technology (IT) leaders and professionals committed to advancing higher education. Our membership includes over 2,000 colleges and universities, over 300 corporations serving higher education IT, and dozens of other associations, state and federal agencies, system offices, and not-for-profit organizations. EDUCAUSE strives to support IT professionals and the further advancement of IT in higher education through analysis, advocacy, community/network-building, professional development, and knowledge creation.

While the higher education IT sector that EDUCAUSE represents does not fall under the critical infrastructure designation, our community has long engaged in multi-stakeholder collaboration on cybersecurity issues to protect institutional data, computer systems, and networks. EDUCAUSE would like to direct your attention to the comments we filed on April 8, 2013, regarding NIST's original RFI, published on February 26, 2013, (http://csrc.nist.gov/cyberframework/rfi_comments/040813_educause.pdf) for background information about the higher education sector.

The remainder of this letter specifically responds to question nos. 13 and 20 in the current RFI.

In July 2000, EDUCAUSE and Internet2 launched the Computer and Network Security Task Force to convene and support community efforts to meet cybersecurity challenges. Now known as the

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Higher Education Information Security Council (HEISC), this member-led program supports higher education institutions as they improve information security governance, compliance, data protection, and privacy programs.

In 2003, HEISC members worked together to create, extend, and refine a higher education-specific information security guide (i.e., an "implementation guide"). The resulting *Information Security Guide: Effective Practices and Solutions for Higher Education* (www.educause.edu/security/guide) is a comprehensive resource for implementing effective cybersecurity policies and practices at colleges and universities.

The *Guide*, much like voluntary resources such as the *Framework for Improving Critical Infrastructure Cybersecurity* (*Framework*), recognizes that a one-size-fits-all approach is not appropriate for successfully managing cybersecurity risk. Since colleges and universities are subject to many regulatory requirements, resources in the *Guide* include direct references to legal requirements such as FERPA, HIPAA, GLBA, COPPA, export controls (ITAR and EAR), ECPA, and FISMA, and popular standards such as ISO, COBIT, NIST, PCI DSS, and the *Framework*.

The *Guide* reflects the key areas represented in the *Framework*. We encourage NIST to make reference to the *Guide* in future iterations of the *Framework (*RFI question no. 13). We also encourage NIST to involve organizations like HEISC in future consultations regarding the *Framework* (RFI question no. 20). Even though higher education appropriately does not fall under the critical infrastructure designation, our community has a considerable, well-organized base of knowledge and experience to contribute to ongoing *Framework* efforts. We would welcome the opportunity to contribute our community's expertise to the process of continuously improving the *Framework* in which NIST and many others are engaged.

Thank you for your consideration of our comments on NIST's *Framework for Improving Critical Infrastructure Cybersecurity*. Please let us know if we might provide further information or perspective that could assist the agency with its work in this area.

Sincerely,
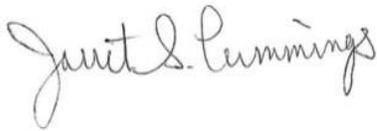
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