



**Subject:**  
**Date:**



RE: ABA Comments on Proposed Changes to the CSF v2.0 Core  
Tuesday, June 27, 2023 1:17:24 PM

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Thanks for acknowledging receipt.

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**Sent:** Tuesday, June 27, 2023 1:09 PM



**Subject:** RE: ABA Comments on Proposed Changes to the CSF v2.0 Core

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**From:** John Carlson 

**Sent:** Monday, June 26, 2023 4:15 PM

**To:** cyberframework <[cyberframework@nist.gov](mailto:cyberframework@nist.gov)>

**Subject:** ABA Comments on Proposed Changes to the CSF v2.0 Core

**To:** Cheryl Pascoe, National Institute for Standards and Technology Cybersecurity Framework Program Lead

**Subject:** ABA Comments on Proposed Changes to the CSF v2.0 Core

Dear Ms. Pascoe:

The American Bankers Association (ABA) values the opportunity to provide comments to the National Institute for Standards and Technology's (NIST) Discussion Draft of the Cybersecurity Framework Core 2.0.<sup>[1]</sup> The ABA commends the continued efforts of NIST to ensure that the next version of the CSF is forward-looking, clear, addresses developments in technology and risk, and improves alignment with national and international cybersecurity standards and practices. We also appreciate your participation in discussions with ABA member banks on NIST's ongoing efforts to update and refine the CSF.<sup>[2]</sup>

We appreciate that NIST included a "Govern" Function in the next version of the NIST CSF. We know that good governance is critical for cyber risk management, and it helps enable and

ensure the success of an organization implementing the other critical functions and associated controls. Additionally, we commend NIST for addressing supply chain risk management in the CSF 2.0 Core. That said, we believe NIST could do more by creating a new Supply Chain Function which would make use of the Framework more effective and efficient for banks and other organizations that use the Framework. One of the tremendous values of the NIST CSF and, by extension the Cyber Risk Institute (CRI) Profile, is its ability to absorb new controls to mitigate threats as the cybersecurity threat and technology landscape changes. Without a Supply Chain Function, the CSF risks not keeping pace with the ever-evolving cybersecurity landscape that practitioners are busy facing every day. Hence, we urge NIST to create a separate Supply Chain Function to address the growing importance of supply chain risk management considerations, as called for by CRI.

Thank you for the opportunity to provide input on behalf of ABA members. If you have any questions, [REDACTED]

Respectfully submitted,

John W. Carlson  
Vice President, Cybersecurity Regulation and Resilience  
American Bankers Association  
[REDACTED]

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[REDACTED]

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- [1] <https://csrc.nist.gov/publications/detail/white-paper/2023/04/24/discussion-draft-of-the-nist-csf-20-core/draft>
- [2] The American Bankers Association is the voice of the nation's \$23.7 trillion banking industry, which is composed of small, regional and large banks that together employ more than 2.1 million people, safeguard \$18.7 trillion in deposits and extend \$12.2 trillion in loans.

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