

From: Karen Clark
Sent: 2/23/2022, 8:38 AM
To: standardsinfo@nist.gov
Subject: Updating the NIST cybersecurity framework for healthcare

Sirs,

I read with interest this morning the update about your work in updating the cybersecurity framework for the supply chain.

My organization is part of a healthcare industry group called The Ortho Forum. With 146 orthopaedic physician practices in 47 States, the OrthoForum is a national physician specialty organization whose membership includes many of the largest independently-owned orthopaedic practices in the United States. It is a best-practices organization that disseminates the lessons learned from the successes of orthopaedic physicians. OrthoForum practices employ approximately 4,000 physicians, 450 nurse practitioners, 2,300 physician assistants, 650 occupational therapists, and 2,500 physical therapists. Independent orthopaedic practices spend \$1.7 billion per year on wages and salaries. The OrthoForum was established to meet the unique challenges that integrated orthopaedic group practices face in today's healthcare environment.

We all know that the cybersecurity landscape has changed dramatically since the HITECH Act was passed, and healthcare has been a specific target of threat actors.

If you plan to update the framework as it relates to HIPAA-covered entities, The Ortho Forum would welcome the opportunity to participate on a committee or advisory board as an industry expert.

Thank you for your time.