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CENTER FOR INTERNET SECURITY®

William F. Pelgrin
President and
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Cyber Framework
NIST

To Whom It May Concern:

On behalf of the Multi-State Information Sharing and Analysis Center (MS-ISAC), a division of the nonprofit Center for Internet Security (CIS), we are writing in support of the adoption of the Critical Security Controls as the baseline for developing the new Cybersecurity Framework. The U.S. Department of Homeland Security recognizes the MS-ISAC as a key cyber security resource for the nation's state, local, territorial and tribal (SLTT) governments and the MS-ISAC members are focused on collaboration that helps collectively improve our cyber security posture.

Our state and local governments are on the front lines of the cyber battle every day. While there is no question that the attack vectors and criminal actors are becoming more complex, many of today's cyber security intrusions and incidents are not the result of sophisticated methods, but rather take advantage of common vulnerabilities and weaknesses. In fact, 97 percent of the breaches analyzed in the 2012 Data Breach Investigations Report were "avoidable through simple or intermediate controls."

The Critical Security Controls help SLTT governments address the security risks by providing recommended mitigation strategies for preventing and protecting against cyber incidents. Strategies outlined in the Controls—such as patching desktop applications and operating systems, employing multi-factor authentication, controlling access privileges and reducing the number of operating system administrators—are key baselines that meet the Presidential Order's objective of creating "a prioritized, flexible, repeatable, performance-based, and cost-effective approach" to cybersecurity.

In addition to supporting the Critical Security Controls through the MS-ISAC, CIS also endorses the Controls as part of its Security Benchmarks effort, which has mapped secure configuration benchmarks to the Critical Controls, and also facilitates aggregate discount purchasing opportunities for SLTT governments for security solutions that address the recommendations provided in the Critical Security Controls.

We appreciate the important spotlight the Administration is putting on cyber security and are poised to assist in any way necessary to help facilitate the development of the Cybersecurity Framework.

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