

Comment to the Preliminary Cybersecurity Framework

Page(s): 22-23

Function: Detect

Category: Security Continuous Monitoring

Comment: The Security Continuous Monitoring Category should be updated to include an additional sub-category requiring continuous monitoring of the configuration baseline referenced in Sub-Category PR.IP-1.

Justification: The effectiveness of definition and implementation of the configuration baseline is greatly diminished unless compliance is monitored on a regular and frequent basis.

Page(s): 25

Function: Respond

Category: Mitigation

Comment: The Mitigation Category should be expanded beyond mitigation of security incidents to include an additional sub-category requiring remediation of identified vulnerabilities in security controls.

Justification: Mitigation efforts should not be restricted to security events alone. Vulnerabilities stemming from security incidents constitute but a single type of security weakness requiring mitigation. The framework should include a stated requirement that all known weaknesses must be addressed according to the risk they pose to organizational systems and assets.