NIST CSF 1.1 Draft 2 Response
Cybernance Corporation
January 18, 2018

Introduction

Cybernance employs the NIST CSF as the foundation of our automated SaaS cyber assessment and monitoring platform, which enables corporate directors and non-technical stakeholders to engage in cyber risk and resilience oversight. We spent many hours in considering what areas are most important to address as the Framework evolves, and we appreciate this opportunity to offer our perspective.

Do the revisions in Version 1.1 Draft 2 reflect the changes in the current cybersecurity ecosystem (threats, vulnerabilities, risks, practices, technological approaches), including those developments in the Roadmap items?

We are pleased the changes made in draft 2 address our comments brought up in the first RFC, especially making the document easier to read by non-technical stakeholders. Another key addition to Version 1.1 are the SCRM controls. Implementing these controls as a part of a recognized standard is extremely useful in quantifying risks by sharing anonymized data across industries, and eventually, globally. Vendors have an inherent risk that can affect their buyers and partners. If information about specific vendors is shared across buyer organizations, the ecosystem as a whole will improve.

For those using Version 1.0, would the proposed changes affect their current use of the Framework? If so, how?

Since the NIST CSF lives at the core of our platform, our software functions will be impacted, and in a positive way. These updates, especially in SCRM, are what our customers are requesting. Version 1.1 will allow us to build out improved supply chain functionality in our platform. Along with software functionality, the other impact to our platform is in the crosswalks with other frameworks, such as HIPAA, ISO 27001, and C2M2. To align NIST with industry and international standards, the crosswalks also need to be updated.

For those not currently using Version 1.0, would the proposed changes affect their decision about using the Framework? If so, how?

While we heavily use the NIST CSF internally and with our customers, we see Version 1.1 as an improvement with minimal downsides.

Submission By

Joseph A. Pidala, Product Manager, Cybernance Corporation – joseph.pidala@cybernance.com