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Sent: Friday, March 3, 2023 1:40 PM

To: cyberframework <cyberframework@nist.gov>

Subject: NIST CSF 2.0 Submission - Security and Strategic Business Decision Making

Hello,

Thank you for the opportunity to contribute to NIST CSF 2.0! Bill Lyons and I have addressed our feedback below. Please reach out to us if there are any questions.

Security and Strategic Business Decision Making

Information Security is a critical business function, especially in highly regulated industries, and is frequently omitted from strategic decisions such as emerging markets, mergers and acquisitions, and changes in technology. As a result of being excluded from these decisions, Information Security teams routinely find themselves on the defensive desperately trying to maintain the required baseline and sacrificing engineering opportunities.

Security Risk Advisors (SRA) would like to propose that a control is added towards Strategy Business Decision Making. Based upon our experience, many companies have succeeded in forming an enterprise Architecture Review Board (ARB) as the primary touch point for a company's strategic decisions. The ARB commonly hosts associates from Procurement, Human Resources, Infrastructure, Change Management, Security, Privacy etc. and is the starting point for enterprise projects. Not only does the ARB add guardrails to enterprise decisions and projects it also incorporates multi-departmental communication and awareness throughout the enterprise.

This control would potentially be grouped in the Identify function within the Governance category, as ID.GV-5 "An Architecture Review Board ensures that relevant organizational stakeholders coordinate for new technology deployments."

Cheers,

Megan DeWitt | Security Risk Advisors |