

From: **Michael Magrath**
Date: Mon, Jan 16, 2017 at 2:07 PM
Subject: Comments on DRAFT Cybersecurity Framework 1.1
To: "cyberframework@nist.gov" <cyberframework@nist.gov>

To whom it may concern,

Having read through the draft I was encouraged to read that the Access Control category has been renamed to **Identity Management and Access Control (PR.AC)** “to better represent the scope of the Category and corresponding Subcategories.”

Comment #1

Although the category has been renamed as noted in the “Note to Reviewers on the Update and Next Steps” on Page ii, with the exception of Page 32, all other references to the Access Control category do not reflect the name change. (Page 12, Page 30, Page 51). They should be changed to **Identity Management and Access Control**

Comment #2

Page 33 reads, “PR.AC-6: Identities are proofed and bound to credentials, and asserted in interactions when appropriate”

Since the framework will be implemented in 16 critical infrastructure sectors by many non-government organizations, e.g., hospitals, the language needs to be specific to non-static password credentials. Identities that are proofed and bound to password credentials are not bound at all since passwords are routinely shared and cannot provide a non-reputable audit trail that a biometric, or token can.

If multifactor authentication is to be a component of the framework, it should be expressly stated. It is not. Perhaps intentionally? Using the term “credentials” is generic and organizations will likely implement the minimum (static passwords) authentication thinking they are adhering to the framework.

Comment #3

As it relates to PR.AC-6, shouldn't SP 800-63-2 and (SP 800-63A added when final is released) added to the list of Informative References? Draft SP 800-63A includes “virtual” identity proofing at IAL 3, which would be beneficial to critical infrastructure sector organizations.

Regards,

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