



November 30, 2013

Information Technology Laboratory
ATTN: Adam Sedgewick
National Institute of Standards and Technology
10 Bureau Drive, Stop 893 Gaithersburg, MD 20899

Mr. Sedgewick,

As many of our shared concerns have already been expressed, I do not see a need to request clarification on the Framework or recommend textual changes. However, there are additional comments/opportunities that Henry Ford Health System wishes to convey in ensuring the Framework is complete, implementable, and followed.

1. **Certification:** Development of an authority or entity that certifies critical infrastructure organizations and service providers as compliant to the Cybersecurity Framework. While certification would be voluntary (or mandated for government agencies), the value derived from certification would be in the form of marketing, assurance between collaborating organizations, and selection of service providers following a thorough methodology for protecting information and systems.
2. **Incentives to Adopt:** Adoption of the Framework is voluntary. However, committing resources to change processes and participate in sharing / collaboration activities with outside entities is an additional burden to both critical infrastructure organizations and service providers. Develop incentives for organizations to adopt the Framework (and/or certification - as recommended above). Incentives could include tax exemptions or cybersecurity insurance premium reductions.
3. **Service Providers:** The Framework considers governance, awareness and training, and monitoring of contractors and service providers. It does not include guidance on performance, adherence to standards/best practices, or contractual amendments for adherence to organizational policies and procedures. Include guidance in the Framework for the management of service providers and contractors.
4. **Collaboration:** Develop a voluntary forum for public sector critical infrastructure participants (non-vendor) to collaborate and share threat information, control safeguards, and lessons learned to react and respond efficiently.
5. **Transparency:** Organizations such as InfraGard (FBI led) are operated with the intent of collaboration for Nation Infrastructure Protection. However, the stigma exists that these collaboration efforts are a one way street with the government obtaining the majority of the value. Develop a two-way process in which valuable threat information is transparent for both the government agency and critical infrastructure participating organization. Collaborate with technology service providers to share threat vector trends so that technology response mechanisms used by critical infrastructure organizations can be updated quickly.

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About Henry Ford Health System

Founded in 1915 by auto pioneer Henry Ford and now one of the nation's leading health care providers, Henry Ford Health System is a not-for-profit corporation managed by Chief Executive Officer Nancy M. Schlichting and governed by a 22-member Board of Trustees, with volunteer-led advisory and affiliate boards providing additional leadership.

It is comprised of hospitals, medical centers and one of the nation's largest group practices, the Henry Ford Medical Group, which includes more than 1,200 physicians practicing in over 40 specialties. The System's flagship, Henry Ford Hospital in Detroit, is a Level 1 Trauma Center recognized for clinical excellence in cardiology, cardiovascular surgery, neurology and neurosurgery, orthopedics, sports medicine, multi-organ transplants and cancer treatment.

With more than 23,000 employees, Henry Ford Health System is the fifth-largest employer in metro Detroit, and amongst the most diverse. Generating more than \$1.7 billion of annual economic stimulus, it proudly acts as one of Michigan's anchor institutions.

Our health system thrives on teamwork, and we know our employees achieve the greatest results when they are working together for a common goal - to provide care for our patients. If you enjoy working in a collaborative environment then we have a job for you!

Henry Ford Health System (HFHS) is one of the nation's leading comprehensive, integrated health systems. It provides health insurance and health care delivery, including acute, specialty, primary and preventive care services backed by excellence in research and education. Founded in 1915 by auto pioneer Henry Ford, the health system is committed to improving the health and well-being of a diverse community. HFHS is a tobacco-free organization.

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Mission: To improve human life through excellence in the science and art of health care and healing.

Vision: Transforming lives and communities through health and wellness - one person at a time.

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