



**Subject:**  
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EXT :FW: Feedback on CSF 2.0 Concept Paper re Potential Significant Updates  
Thursday, March 9, 2023 1:57:13 PM

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FYI



**Sent:** Thursday, January 19, 2023 5:13 PM  
**To:** cyberframework <cyberframework@nist.gov>  
**Subject:** Feedback on CSF 2.0 Concept Paper re Potential Significant Updates

Hello,

I am excited about the addition of "Govern!!"

While the wording in the concept paper leads me to believe that this change is "fait accompli," I wanted to go on the record supporting this change.

In our risk assessment engagements, we find it important to understand how and how well an organization manages the implementation and maintenance of controls. And to what degree the organization uses a risk management process to determine the level of governance needed.

While you are focused on risk management decisions at the level of accept, mitigate, transfer, or avoid, we go one level deeper. We focus on the degree of a control's risk mitigation. A control may have a very high theoretical risk reduction capability. But poor administration of the control will greatly reduce its actual risk reduction. Coverage is also obviously important.

Thank you.

**Bill Frank**, Chief Client Officer

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