


From: [Vishwas Manral](#)
To: [cyberframework](#)
Subject: Feedback for draft: NIST CSF 2.0
Date: Saturday, September 9, 2023 9:00:08 PM

From: Precize Inc,


Hello NIST CSF team,

Thank you for the excellent work on the NIST CSF 2.0 Released on August 8, 2023. We would like to give some comments on the same. Would be happy to provide any follow ups as needed.

The key highlight of comments are around the Govern function that was introduced:

1. The document talks extensively of Cybersecurity Risk Governance (CSRG) and the term seems to be not defined anywhere, not even in the NIST glossary. We should add the definition of Cybersecurity Risk Management (CSRM) in the document too of point to the NIST Glossary for the same.

2. For "Govern": some of the key things I feel are critical are:

Establish, **measure** and monitor the organization's cybersecurity risk management strategy, **framework**, **metrics** and policy

3. As part of Governance we should to highlight the need to operationalize the Governance framework. The biggest gaps we see is Governance is not the lack of Governance mandates but the translation of that into actual operations.

As an example in the Cloud we find a total lack of governance, where security teams are even unaware of the details of what application, what owner, business sensitivity in the accounts in the organizations that are there.

4. Because of my lack of clarity in reading the document, I wrote a post here: <https://www.linkedin.com/feed/update/urn:li:activity:7104909341677277184/> It looks like Governance is already used in the security industry for multiple cases like Identity Governance and Data security Governance. We could take some of the terminology around the same.

5. I also had questions on "Supply chain", in the Cloud or other ephemeral software environments, it's not just about Supply chain but lineage to help with provenance. My view is if we could add text around lineage in the document under supply chain that would be great for sure.

Thanks,
Vishwas Manral
(on behalf of Precize Inc)