

#	Organization Name	Submitted By	Type*	Page #^	Starting Line #^	Ending Line #	Section #	Comment (Include rationale for comment)^	Suggested Change^
	Iowa State University	Brooke Langlitz	G	3	257	259	1.1	Receiving this language at the award stage is not sufficient for the university to adequately budget for or prepare the environment for additional security requirements. The costs of a threat hunting team and managing a deception network may not be financially feasible, depending on the funding levels of projects requiring 800-171B controls.	Require agencies to identify projects requiring 800-171B controls at the proposal stage, allowing contractors to adequately determine whether they wish to apply for the project given the security requirements.
	Iowa State University	Brooke Langlitz	G	3	257	259	1.1	Currently, DOD includes DFARS 252.204-7012 incorporating NIST 800-171 in all DOD contracts and will not remove the clause, causing confusion on fundamental research projects. Instead, they tell universities that if CUI, the clause is 'self-deleting.' The concern is that agencies may also use this tactic with 800-171B.	State that this clause should only be present in contractual vehicles when the clause is applicable.

^ Required Field

\*Type: E - Editorial, G - General T - Technical

Comment Template for  
Initial Public Draft NIST SP 800-171B

Please submit responses to:  
sec-cert@nist.gov by July 19, 2019

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	Iowa State University	Brooke Langlitz	G	8	370	371	3	Definitions of critical program and high value asset are missing from this section and Section 1.1. Without clear definitions, agencies may broadly and arbitrarily interpret these terms and subsequently violate NSDD 189 by applying these controls to fundamental research.	Clearly define these terms and create an exemption for fundamental research.