

From: [REDACTED] [via 800-171comments](#)
To: 800-171comments@list.nist.gov
Subject: [800-171 Comments] Comments on NIST SP 800-171r3 initial public draft
Date: Monday, November 13, 2023 5:48:12 PM
Attachments: [image001.png](#)
[sp800-171r3-fpd-comment-SKULMOSKI.xlsx](#)

Hello

I've attached comments regarding the NIST SP 800-171 Rev. 3 (Final Public Draft) Protecting Controlled Unclassified Information in Nonfederal Systems and Organizations.

Thank you for your fine work and the opportunity to comment.

Sincerely,

Greg

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Book in Print: *Shields Up: Cybersecurity Project Management*
Book In Press: *Cybersecurity Training: A Pathway to Readiness*
Book In Progress: *Quantum Cybersecurity: A Transition Plan*



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Comment #	Submitted By (Name/Org):*	Type (General / Editorial / Technical)	Source (publication, analysis, overlay)	Starting Page # *	Starting Line #*	Comment (include rationale)*	Suggested Change*
1	Greg Skulmoski	Editorial		Table of Contents P. 17 heading Table 4, page 80		<p>Role-based training is used rather than "specialized" training as per the NIST CSF 2.0 IPD (8 Aug 2023). The term "role-based" training aligns with NIST SP 800-16 A Role-Based Model for Federal Information Technology/Cybersecurity Training, NIST Framework for Improving Critical Infrastructure Cybersecurity v1.1 (2018), NICCS The Workforce Framework for Cybersecurity (NICE Framework) Work Roles, and others in the NIST family of documents. However, "specialized" training has replaced "roled-based" training in the NIST CSF 2.0 IPD (8 Aug 2023). A goal of the NIST program of documents is to reduce risk and improve communications with a consistent use of terms. Using role-based training puts the NIST SP 800-171 Rev. 3 Protecting Controlled Unclassified Information in Nonfederal Systems and Organizations out of synch with NIST's foundational document: NIST CSF 2.0.</p>	<p>Align with the NIST CSF 2.0 and use "specialize" training rather than "role-based" training.</p> <p>However, the use of "role-based access" is appropriate in NIST SP 800-171 Rev. 3..</p>