

From: [REDACTED] [via 800-171comments](#)
To: 800-171comments@list.nist.gov
Cc: [REDACTED]
Subject: [800-171 Comments] Comments on CUI Series Publications
Date: Thursday, September 15, 2022 5:58:11 PM

1. The scoring methodology in 800-171A can derive a score from multiple variables. For example, a score of 40 seems low, but with 110 controls and multiple assessment criteria there are hundreds of ways to arrive at the score of 40. Is there a plan to derive a score that is more objective than subjective?
2. Stabilization question- in recent months we have seen CMMC suggest changes to 800-171, we have seen 800-171A in contracts requiring attestation to SPRS, and we have seen 800-172. The origins are all to 800-53, will we see unification in these standards and guidance where each will apply and how 800-53 may be separate from contractor information systems? Many contracts imply 800-53 is required for contractor information systems as the standard is referenced, but the standard does not typically apply.
3. Will NIST simplify 'how' compliance is measured? All information systems are different, but most have similar characteristics.
4. Will 800-171 require organizations to keep a log of CUI located within the information system?
5. How will the requirements related to NIST 800-171 (800-171, 800-53, DFARS, ect...) be simplified for contractors?
6. How will FAR (52.204-21) and DFARS (252.204-7012) requirements for safeguarding information be rationalized? Some contracts reference both, some reference one or the other.
7. Will NIST recommend agencies adopt a common standard rather than each agency developing a standalone CUI program?

Steven Hurst
Director, Federal Information and Technology
Federal Business Services
M [REDACTED]
[REDACTED]

AECOM
aecom.com

Delivering a better world
[LinkedIn](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)