Regarding section 3.13.8 on encryption, I would suggest more clarity and guidance regarding encryption inside the organization’s network. The requirement says it applies both internally and externally, but offers many alternatives or “escape” phrases allowing encryption to be deferred.

In my experience, many organizations are not encrypting inside the firewall. This especially applies to interface transmissions containing CUI such as PII and PHI, but also goes to data at rest in databases.

Assessing the value of internal encryption is complex and interdisciplinary. Some system administrators feel their server and network protections amount to a “protected distribution system” (PDS) as referenced in 3.13.8. As such, they feel that encryption is not needed or of lower priority.

The audience for this publication series and other NIST documents needs further guidance on this topic. Regarding encryption for internal data, both in motion and at rest, it would help to have NIST provide the following:

- How should internal encryption’s value be evaluated in a risk assessment?
- How much does internal encryption increase an organization’s security posture?
- What are specific ways that internal encryption increase security? (Please provide examples.)
- If an organization cannot encrypt all internal CUI, is it worth encrypting anything?
Can encryption be implemented incrementally and still offer value?

Thanks,

Thanks!

Scott

Scott Hall
Mercy Medical Center Cedar Rapids

Confidentiality Notice: This message and any attachments may contain confidential and privileged information that is protected by law. The information contained herein is transmitted for the sole use of the intended recipient(s). If you are not the intended recipient or designated agent of the recipient of such information, you are hereby notified that any use, dissemination, copying or retention of this email or the information contained herein is strictly prohibited and may subject you to penalties under federal and/or state law. If you received this email in error, please notify the sender immediately and permanently delete this email.