From: via 800-171comments

To: 800-171comments@list.nist.gov

Subject: [800-171 Comments] Comments on 800-171 Rev. 3

Date:Thursday, July 13, 2023 9:16:50 AMAttachments:sp800-171r3-ipd-comment-template.xlsx

Thank you for all of your work on the new NIST-171 Rev. 3 revision. We are seeking some clarification on levels of encryption and where they can be deployed. Please see the attached. Thank you!

Daniel Leggett, CIA, CISA, CRISC Program Director, Research Compliance Information Security and Privacy Office (ISPO) Information Technology Services Florida State University

Comment #	Submitted By (Name/Org):*	Type (General / Editorial / Technical)	Source (publication, analysis, overlay)	Starting Page # *	_	Comment (include rationale)*	Suggested Change*
						In reference to 3.13.8: Transmission and Storage Confidentiality. Implement cryptographic mechanisms to prevent the unauthorized disclosure of CUI during transmission and while in storage.	
						Could clarification be provided on whether "FIPS-compliant" cryptography will be considered sufficient to meet the requirement? Vendors are using this	
	Florida State University - Information Technology		NIST 800-			terminology, as opposed to "FIPS-validated" to state their products meet the FIPS 140-2 cryptography standard, and therefore meet NIST 800-171	Cryptographic standards include FIPS- compliant and FIPS-validated
1	Services	Technical	171R3 Draft	49	1877	requirements.	cryptography.
							Cryptography can be employed to support a variety of security solutions, including the protection of CUI. The level and areas requiring cryptography,
						of cryptography when used to protect the confidentiality of CUI: [Assignment:	applicable laws, Executive Orders, directives, regulations, policies, standards, and guidelines, including
						Could clarification be provided on whether cryptography will be required on all	policies, standards and guidelines
	Florida State University -						developed by the organization. FIPS-
	Information Technology		NIST 800-			allowed to determine the level of encryption as well as where encryption is	validated cryptography is described in
2	Services	Technical	171R3 Draft	51	1919	employed?	[30] [31] [32].