

**From:** [REDACTED] [NIH/OD \[C\]" via 800-171comments](#)  
**To:** [800-171comments@list.nist.gov](mailto:800-171comments@list.nist.gov)  
**Subject:** [800-171 Comments] NIST 800-171 Rev 3 draft comments  
**Date:** Tuesday, July 11, 2023 5:13:10 PM  
**Attachments:** [sp800-171r3-ipd-comment-template SG.xlsx](#)

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Thank you for the opportunity to review.  
Please see attached.

Sunita Gopalani

Contractor -Cyber Risk Management & Policy  
NIH Information Security Program  
Office of the Chief Information Officer (OCIO)  
National Institutes of Health  
[6555 Rock Spring Drive, Bethesda, MD 20817](#)

Comment #	Submitted By (Name/Org):*	Type (General / Editorial / Technical)	Source (publication, analysis, overlay)	Starting Page # *	Starting Line #*	Comment (include rationale)*	Suggested Change*
1	Aristi Tech	General	Publication			Has NIST has moved away from the original intent to provide industry (non-government) a plain language document to implement security controls. This major shift towards 800-53 Rev 5 is burdensome, specially with the requirement to define ODPs (pushes an independent organization to follow the govt. agency ODP which may be better fit for the agency vs the private organization); this shift aligns more so with FISMA compliance for non-federal systems. This document will have immense impact on contractors with DFARS requirements and looking for CMMC certifications. It appears NIST is converging to FISMA compliance for all.	
2	Aristi Tech	Technical	Analysis	Row 104 and 105		PL-4 control is repeated but the summary of change comments are different. Recommend this stay as a NFO.	
3	Aristi Tech	Technical	Analysis	Row 100 and 101		PL-1 is repeated; PL-1 the only Policy and procedure requirement, not clear why this was included when all other -1 controls were not?	
4	Aristi Tech	Technical	Analysis	Row 79		<b>Independent Assessment</b> This is burdensome and cost prohibitive in most cases for smaller organizations.	This is a burdensome requirement and removes the flexibility of self assessments, please clarify level "independence" here.
5	Aristi Tech	Technical	Analysis	Row 76 and 79		What is the difference between controls assessments and independent assessments?	
6	Aristi Tech	Technical	Overlay/analysis			The Overlay shows many -1 controls that are marked as CUI but those are not in the Analysis? Ex AC-1. AT-1	