To Whom It May Concern:

Please find attached the comment template for the Initial Public Draft of NIST SP 800-171, Revision 3.

There is only 1 comment row entered in this submission. Please let me know if you have any questions or my comments create any confusion.

Kind regards,

Kind regards,

Wendy M. Epley, MSc-RTC, ECoP®, CMMC-RP/RPA/CCP

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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	Wendy Epley / The University of Arizona	Editorial	Publication	45	1681	Objective 3.12.2 is titled "Plan of Action and Milestones". However, the U.S. Department of Defense has advised this term or its acronym POAM to not be used as this is the term used by Assessors for the Cybersecurity Maturity Model Certification (CMMC) Program. Rather, it is advised organizations use the phrase "List of Deficiencies" or something similar be used as a document title by organizations. Using this alternate term will eliminate confusion and provide for distinction when a CMMC Assessment is conducted by a Certified Third-Party Assessor Organization (C3PAO) or the Defense Industrial Base cybersecurity Assessment Center (DIBCAC). Since the NIST SP 800-171 is a publication focused on non-federal systems, the removal of POAMs should be accepted since it is a term more appropriate for the NIST SP 800-53 which is focused on federal systems.	It is suggested the following 4 changes be made to Objective 3.12.2: [A] Change the Objective title from "Plan of Action and Milestones" to "Deficiencies Management". [B] remove "plan of action and milestones" in bullet "[a]" and replace with "list of deficiencies". [C] remove "plan of action and milestones" in bullet "[b]" and replace with "list of deficiencies". [D] remove "Plans of action and milestones" and "POAMs" from Discussion section and rephrase to reference a "list of deficiencies".