

June 27, 2023

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Senior Technology Policy Advisor
U.S. Department of Commerce | NIST
100 Bureau Drive
Gaithersburg, MD 20899

Gema Howell
IT Security Engineer
U.S. Department of Commerce | NIST
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RE: Cybersecurity for R&D Request for Comment—response submitted to cyber4R&D@nist.gov

Dear Ms. LaSalle and Ms. Howell,

On behalf of EDUCAUSE, I would like to thank you for the opportunity to respond the Cybersecurity for R&D Request for Comment (RFC) (<https://www.nist.gov/cybersecurity/cybersecurity-rd-request-comment>). The email with which this letter was submitted includes the response of our community to the RFC, which is provided via the spreadsheet form made available for that purpose. As the association for advancing higher education through information technology (IT), EDUCAUSE represents over 2,100 colleges, universities, and related organizations. Higher education chief information officers (CIOs), chief information security officers (CISOs), and IT leaders and professionals at all levels of the institution work together through EDUCAUSE to advance the state of research cybersecurity in higher education.

The EDUCAUSE community appreciates the consideration that NIST is giving to the resources it might develop to accelerate the progress of research cybersecurity. We hope that our suggestions will prove useful as the process continues. However, EDUCAUSE members also hope to engage with you and your colleagues via dialogue sessions that will allow for a free-flowing exchange of ideas and information. In providing input for our response, members indicated that having a deeper understanding of what NIST sees as possible in this space would greatly assist them in tailoring recommendations for both viability and impact. EDUCAUSE

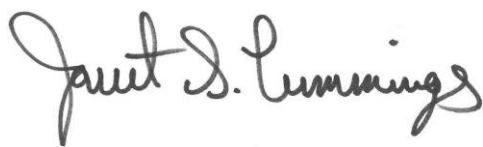
would be happy to work with NIST to organize a series of such discussions, which we believe would provide NIST with a much greater body of well-informed feedback.

I look forward to hearing from you as you have the chance to process the input you receive through the RFC and think about the additional knowledge and perspective that you might find helpful. In addition to exploring possible options for greater engagement with higher education cybersecurity leaders and professionals on the issues raised in the RFC, I would also appreciate the opportunity to clarify any of the comments that we submitted if and when needed. Please feel free to get in touch with me at your convenience.

Please also note that EDUCAUSE enjoys the support of (COGR) (cogr.edu) in submitting these comments and would be happy to have COGR members and staff participate with us in discussion sessions on this topic. COGR is an association of over 200 public and private U.S. research universities and affiliated academic medical centers and research institutes. It focuses on the impact of federal regulations, policies, and practices on the performance of research conducted at COGR member institutions, and it advocates for sound, efficient, and effective regulation that safeguards research and minimizes administrative and cost burdens. EDUCAUSE and COGR have previously held joint discussions with federal government representatives on issues of shared interest and found that having the research and cybersecurity perspectives reflected in the same discussion can be highly productive.

Thank you again for your efforts on this important project.

Sincerely,

A handwritten signature in dark ink, reading "Jarret S. Cummings". The signature is fluid and cursive, with the first name "Jarret" being the most prominent.

Jarret S. Cummings
Senior Advisor, Policy and
Government Relations
EDUCAUSE