

CLASSIFICATION

MDA COMMENTS MATRIX: Draft NIST SP 800-171 Rev.B

(Please read instructions on back before completing form.)

#	Class	Component and POC Name, Phone, and E-mail	Page #	Para #	Comment Type (A/C/S)	Comments, Justification, and Originator Justification for Resolution	A/R/P
1	U	MDA, DA ISSM, Michael Wojcik, Ph.D, 256-313-9389, michael.wojcik@mda.mil	8	Para 1, line 371	C	<p>Coordinator Comment: Add the definition of critical program and high value assets (HVAs) into the beginning of the discussion. Add...” An agency may designate Federal information or a Federal information system as an HVA when it relates to one or more of the following categories:</p> <ul style="list-style-type: none"> • <i>Informational Value</i> – The information or information system that processes, stores, or transmits the information is of high value to the Government or its adversaries. • <i>Mission Essential</i> – The agency that owns the information or information system cannot accomplish its Primary Mission Essential Functions (PMEF), as approved in accordance with Presidential Policy Directive 40 (PPD-40) National Continuity Policy, within expected timelines without the information or information system. • <i>Federal Civilian Enterprise Essential (FCEE)</i> – The information or information system serves a critical function in maintaining the security and resilience of the Federal civilian enterprise (OMB M-19-03).” <p>Coordinator Justification: NIST 800-171 Rev.B focuses on the protection of critical programs and HVAs, particularly against the advanced persistent threat. The OMB M-19-03 footnote is an excellent reference for the definition of who defines critical programs and HVAs and the high level criteria for designating HVAs based on information value, mission essential confirmation, and the security and resilience of the federal civilian enterprise. It is worth bringing this subject matter out of the footnote and making it a part of the main opening discussion, since designating critical programs and HVAs will denote what assets need to be protected with the enhanced security requirements of the NIST SP 800-171 Rev.B.</p> <p>Originator Justification for Resolution:</p> <p>Coordinator Concurrence on Resolution:</p>	

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INSTRUCTIONS FOR COMPLETING MDA FORM 100

Use this form to provide administrative, critical, and substantive comments. Complete the classification header and footer, columns 1 through 6, and the first two entries in column 7. Upload the form in E-Tasker in MS Word format.

Office of Primary Responsibility (OPR): Use this form to consolidate comments from all coordinators and to record adjudication of the comments. When consolidating comments, place them in alphabetical order of the Office of Coordinating Responsibility's (OCR's) office symbols. Complete the third entry in column 7, and column 8. Adjust the classification header and footer and columns 1 and 2 as appropriate.

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Classification – Enter the highest classification of the comments.

Column 1 – Enter the number of the comment.

Column 2 – Enter the classification of the comment.

Column 3 – Enter the appropriate information.

Column 4 – Enter the appropriate information.

Column 5 – Enter the appropriate information.

Column 6 – Enter the comment type as defined below:

(A) Administrative: Comments that address minor items such as typographical, format, and/or grammatical errors.

(C) Critical: Comments that discuss major deficiencies. Critical comments that identify violations of the law, contradictions of policy, policy established in MDA Issuances; unnecessary risks to safety, life, or limb; or unreasonable burden on budget or resources. The MDA General Counsel will identify legal objections as critical comments.

(S) Substantive: Substantive comments are made when the document appears to be or is potentially unnecessary, incorrect, misleading, confusing, or inconsistent or when an OCR disagrees with the proposed responsibilities, requirements, and/or procedures.

Column 7

- **OCR:** Enter the comment in the area provided. You must provide a justification for administrative, critical, or substantive comment(s) and add your requested or recommended changes in the area provided.
- **OPR:** Enter your justification for accepting/rejecting the comment. Coordinate with the OCR and enter the resolution in the area provided.

Column 8 – Enter whether you accepted (A), rejected (R), or partially accepted (P) the comment.