

#	Organization Name	Submitted By	Type*	Comment (Include rationale for comment)^	Suggested Change^
	The University of Nevada, Las Vegas, OVPRED	Brad Woods	G	As written, there is much uncertainty related to how universities are supposed to implement the new regulations in time to meet the government's contracting needs.	Clarify how non-federal entities, such as universities, are supposed to implement the proposed regulations in accordance within a specified contracting period.
	The University of Nevada, Las Vegas, OVPRED	Brad Woods	G	Given the scope of proposed regulations noted under NIST SP 800-171B, the amount of time necessary to implement and subsequently become compliant with such standards may not be fully considered within the Public Draft. Areas such as 1) Awareness and Training; 2) audits, accountability, and oversight mechanisms; 3) incident response; and 4) maintenance are all facets that tend to vary among universities and are thusly difficult to implement due to well-established cultures of sharing and transparency.	Engage universities to solicit analyses on the timeline and challenges related to implementation and compliance.

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	The University of Nevada, Las Vegas, OVPRED	Brad Woods	G	There exists no mechanisms or avenues for universities to recover costs associated with implementation	Implement avenues for cost recovery
	The University of Nevada, Las Vegas, OVPRED	Brad Woods	G	The Proposed Draft does not account for necessary training, tracking, and monitoring efforts universities must undertake to ensure compliance. The Draft appears to target a more narrow subset of defense contractors, whose potential exposure is more predictable and manageable. In contradistinction, universities have high turnover among students and promote openness and transparency in research.	Engage universities to solicit analyses on the structural and functional needs for implementation.