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Comments Received:

- 1. How stringent is the one-to-one mapping of the CISA requirements to the NIST SP 800-218 standard? Do we need to follow all the NIST requirements for us to be able to meet the CISA requirement?
- 2. Would the form be accepted only when all the requirements are met? Could you provide a format for the POAM that needs to be submitted when there is non-conformance?
- 3. We recommend the agencies to do a sample check of the form for the products under consideration and allow time to incorporate feedback before finalizing self-attestation
- 4. There needs to be a clarification on the term "developed", as software developed after 12-Sep-2022 will likely include components developed before this date. If a company compiles software with older components today, does that constitute development and therefore the older components are now under the scope of the attestation? Or are only the newly developed components under the scope of the attestation?