Response to NIST and NTIA NOI

Incentives To Adopt Improved Cybersecurity Practices

Submitted By:

The American Association for Laboratory Accreditation (A2LA)

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The American Association for Laboratory Accreditation (A2LA) appreciates the opportunity to respond to the Notice of Inquiry regarding "Incentives To Adopt Improved Cybersecurity Practices." As an Accreditation Body that accredits organizations to conformity assessment standards, we would like to address the question regarding "the use of conformity assessment processes that collectively increase the level of assurance while preserving organizations' brand standing and the integrity of products and services."

In the past, the federal government has used conformity assessment processes for a variety of programs. The benefit of the conformity assessment process approach is that it provides government and private users a mutually accepted level of assurance regarding the integrity of the product or service provided by the accredited company.

The federal government's most recent cybersecurity program is FedRAMP. This program uses standardized security requirements and a conformity assessment approach to accredit Third Party Assessment Organizations to ISO/IEC 17020:2012 *Conformity assessment – Requirements for the operation of various types of bodies performing inspection*. FedRAMP requires an inspection of cloud service providers who would like to provide their services to government agencies.

A common conformity assessment process utilized by both government agencies and private industry would allow service and product providers to be assessed to a conformity assessment standard by an Accreditation Body. A single accreditation acceptable to both government agencies and private industry would provide a simplified, streamlined procurement process.

Service and product providers would benefit from being able to reference their accreditation, and avoid having to submit a detailed report regarding how they are qualified for each contract on which they are bidding. End users would benefit from the common conformity assessment approach because they could rely upon the company's accreditation, rather than expend time and resources to audit or validate the product or service provided.