Dear NICE Program Office,

Please find below some comments for consideration in the framework update process. For context, Focal Point Academy is a workforce development organization that serves both public and private sector customers. Our utilization of the framework to date has included aligning our own training offerings (including using the NICCS portal), and helping our customers to evaluate their own capabilities by comparing/aligning their work roles and organizational structure to those in the framework.

Role Definitions

One of the challenging things about applying the NICE Framework across organizations is that every organization has a different nomenclature in use for their roles and structure. Arriving at a common lexicon of terms is one of the stated goals of the framework. This appears to be working well for function/task/KSA-related terms, however in our experience working with customers across the public and private sectors, it tends to come unstuck at the work role level and above. This is partly due to the government flavor that is still present in some of the role titles (see for example 'Cyber Defense Incident Responder' – commercial security organizations do not tend to use titles like this), and partly due to the fact that everyone just uses a different naming convention. Is a Threat Intelligence Analyst in one company doing exactly the same role as a Threat/Warning Analyst in another?

One solution to this might be to create alternate titles for each of the roles so that organizations and employees can more easily find their fit in the framework. The downside to this approach is that it introduces another layer of complexity (managing multiple titles for a role instead of just one), and it goes against the intended goal of establishing the common taxonomy/lexicon.

We believe that a better way is to introduce a mechanism to create custom roles. We have worked with several customers who love the idea of being able to align their roles to the NICE work roles, filter down to the tasks that are currently part of their organizational role, and then perform a gap analysis to determine the level of coverage they have and discover tasks that they may be missing. This way the framework does not increase in complexity, but organizations get increased flexibility in using it.

Additionally, it would be great to conduct a review of the role titles and adjust them as appropriate based on industry data, job vacancy titles, etc. For example, it is likely that simply changing 'Cyber Defense Incident Responder' to 'Cyber Incident Responder' would lower the mental barrier for many in the private sector as they attempt to align their roles to the framework. This may seem like a trivial example, but aligning the work role titles with industry norms is necessary if we want to see

the framework adopted across a broader swath of the private sector. We would be more than happy to participate in a review of this nature if one is conducted.

Thanks,
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