This feedback is from the GIAC Certification program and is broken out by the numbered items as you had listed on the NICE Request for Comments website.

Awareness, Applications, and Uses of the NICE Framework

Topic area # 10. Propose any improvements for the application and use of the NICE Cybersecurity Workforce Framework.

GIAC Program feedback: We view the NICE Framework as a tool. Any tool, should have instructions for proper and best use. Instructions are even more important when tools are as complex and unique as the NICE Framework. Instructions are necessary to prevent use of the tool that could result in suboptimal or unintended consequences.

A specific example of an application of the NICE Framework is that the approach used by the DoD 8140 program to map certifications to DCWF (Dod Cyber Workforce Framework) job roles. (Note: DCWF is largely based upon the NICE framework.) The mapping approach employed expected credentials to map 70% of the KSAs for any role for which they were considered. Due to the high volume of basic, fundamental, and pre-requisite KSAs present in every job role, entry level certifications could be mapped to most job roles. On the other hand, more advanced certifications focusing on fewer KSAs in greater depth were less likely to mapped to the job roles that they are relevant to under DoD 8140. The unintended consequence is that some DoD employees might not be able to receive the most advanced training relevant to their job roles under DoD 8140 because of the volume of NICE KSAs and the mapping approach employed.