Good Morning:

I am with the VA Privacy Service. Attached are comments from the VA Privacy Service on the NICE Cybersecurity Workforce Framework. If you have any questions about the comments attached, please feel free to contact me.

Sincerely,

Amy L. Rose, Ph.D., PMP
Program Analyst
VA Privacy Service
Office of Information Security

#	Page/Section	Recommendation / Comment	Comment From	Disposition / Action	Date	Status
1.	Page 25 Table 4 - NICE Framework Tasks	Task ID #T0032 Task Description: Required to add Privacy Controls while conducting Privacy Impact Assessments (PIAs).	VA Privacy Service	Conduct Privacy Impact Assessments (PIAs) of the application's security design for the appropriate security **and Privacy** controls, which protect the confidentiality and integrity of Personally Identifiable Information (PII).	January 2, 2020	
2.	Page 40 Table 4 - NICE Framework Tasks	Task ID #TO474 Task Description: Required to add Privacy Policies.	VA Privacy Service	Provide legal analysis and decisions to inspectors general, privacy officers, oversight and compliance personnel regarding compliance with cybersecurity **and privacy** policies and relevant legal and regulatory requirements.	January 2, 2020	
3.	Page 53 Table 4 - NICE Framework Tasks	Task ID #T0876 Task Description: Required to delete word "Corporate" and suggested to add "Privacy Officer" from the task description.	VA Privacy Service	Coordinate with the ~~Corporate~~ Compliance Officer **and/or Privacy Officer** regarding procedures for documenting and reporting self-disclosures of any evidence of privacy violations.	January 2, 2020	
4.	Page 53 Table 4 - NICE Framework Tasks	Task ID #T0885 Task Description: Required to delete word "CEO" and Suggested to add CPO, SAOP and CIO.	VA Privacy Service	Report on a periodic basis regarding the status of the privacy program to the Board, ~~CEO~~ **Chief Privacy Officer (CPO), Senior Agency Official for Privacy (SAOP), Chief Information Officer (CIO)** or other responsible individual or committee	January 2, 2020	

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5.	Page 54 Table 4 - NICE Framework Tasks	Task ID #T0891 Task Description: Required to delete word "Corporate" and suggested to add "Organization"	VA Privacy Service	Resolve allegations of noncompliance with the ~~corporate~~ **organization's** privacy policies or notice of information practices.	January 2, 2020	
6.	Page 54 Table 4 - NICE Framework Tasks	Task ID #T0893 Task Description: Required to delete word "Corporate" and suggested to add "Organization"	VA Privacy Service	Undertake a comprehensive review of the ~~company's~~ **Organization's** data and privacy projects and ensure that they are consistent with ~~corporate~~ **Organization's** privacy and data security goals and policies.	January 2, 2020	
7.	Page 54 Table 4 - NICE Framework Tasks	Task ID #T0894 Task Description: Required to delete word "company" and suggested to add "Organization"	VA Privacy Service	Develop and manage enterprise-wide procedures to ensure the development of new products and services is consistent with ~~company~~ **Organization's** privacy policies and legal obligations.	January 2, 2020	
8.	Pages 12 – 15 /Section A2 NICE Framework Specialty Areas	Incorporate Privacy as applicable under Table 2 – Nice Framework under Specialty Areas and Specialty Area Description columns	VA Privacy Service	Add new verbiage for Privacy	January 7, 2020	
9.	Pages 24 - 58 / Section A4 NICE Framework Tasks	Incorporate Privacy as applicable under Table 4 – Nice Framework Tasks	VA Privacy Service	Add new verbiage for Privacy	January 7, 2020	
10.	Pages 59 – 76 / Section A5 NICE Framework Knowledge Descriptions	Incorporate Privacy as applicable under Table 5 – NICE Framework Knowledge Descriptions	VA Privacy Service	Add new verbiage for Privacy	January 7, 2020	

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11.	Pages 77 - 87 / Section A6 NICE Framework Skills Descriptions	Incorporate Privacy as applicable under Table 6 – NICE Framework Skills Descriptions	VA Privacy Service	Add new verbiage for Privacy	January 7, 2020	
12.	Pages 88 - 94 / A7 NICE Framework Ability Descriptions	Incorporate Privacy as applicable under Table 7 – NICE Framework Ability Descriptions	VA Privacy Service	Add new verbiage for Privacy	January 7, 2020	
13.	Throughout	Overall recommendation is to use privacy as applicable with cybersecurity verbiage throughout the document	VA Privacy Service	Add new verbiage for Privacy	January 7, 2020	