

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.

#### Improvements to the NICE Framework

Topic area # 9. Explain whether the NICE Framework indicates which Knowledge, Skills, and Abilities could be considered as foundational for all workforces that regularly interact with networks, systems, and data in cyberspace.

GIAC Program feedback: It seems unlikely that there are meaningful universal KSAs required of all who work in cyber security. It is a convenient way to think, but we believe it is an oversimplification. For example, it is uncommon for executives and management personnel to have basic programming or penetration testing skills. An executive with rare ability in these areas may still lack the skill sets of entry level personnel who actually work in these roles.

For a more specific example, consider that about 50% of the KSAs for the Software Developer Role are fundamental topics that undergraduate students study in a computer science curriculum. These KSAs are not duplicated in more advanced courses on software security. More advanced security focused certifications for software developers will never map to the a majority of the KSAs for this role. The unfortunate consequence is that software developers utilizing the framework will not be able to get the advanced training they need.