

Hello NICE team,

Thank you for the opportunity to provide formal feedback on the framework. 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 # 2. Describe what components of the NICE Framework have been least useful to you and why.

GIAC Program feedback: -

It is our understanding that the KSA and tasks themselves have never been examined critically and revised, since the framework's introduction six years ago. We understand that the Industrial Psychologists overseeing the working groups for each role and specialty area used an inclusive approach when the KSAs were originally created and assigned to specialty areas and roles. As a result, many basic, pre-requisite KSAs are over represented in most job roles.

-There are far too many KSAs and tasks. Most organizations don't have the time to review them in any detail.

-There is no guidance regarding how organizations should use these.

-Many KSAs and some tasks are organization-specific. For example consider K0028, " Knowledge of organization's evaluation and validation requirements." or K0146, " Knowledge of the organization's core business/mission processes."

-Many KSAs are so broad as to be practically meaningless. For example consider K0322, "Knowledge of embedded systems". What type of embedded systems? What OS? What level of knowledge? How to secure? How to design? How to use?

-Many KSAs are pre-requisite or too basic for the roles to which they are assigned. Consider K0004, "Knowledge of Cybersecurity Principles" and K0344, "Knowledge of Cyber Threat Environments" in the context of the role of Vulnerability Assessment Analyst. The people working in this role have to be able to analyze vulnerabilities and exploit them. This is not the place for people first learning cyber security principles or threat environments. These KSAs and others like them water down the roles they are assigned to.

Thank you,

Jeff Frisk, Director
GIAC Certification Program