

Good evening,

Please see below for comments:

Improvements to the NICE Framework

The following topics are intended to help NIST and its partners who are part of the NICE Community to learn about experiences in applying and using the NICE Framework and explore opportunities for improvement.

1. Describe what components of the NICE Framework have been most useful to you and why. *A defined, Department-wide standardization for grouping employees based on current recruitment and training/development needs.*
2. Describe what components of the NICE Framework have been least useful to you and why. *The increased number of NICE codes in NICE 2.0/800-181 makes it difficult to provide “general” data in public settings without compromising the security and mission of law enforcement and cyber security/operations personnel or sectors.*
3. Share any key concepts or topics that you believe are missing from the NICE Framework. Please explain what they are and why they merit special attention. *Human Resources and Policy/Planning roles should be separately defined from management, as resources that know cyber HR, recruitment, and staffing are in high demand and limited among the general population of HR practitioners.*
4. Describe how the NICE Framework can be more useful to a variety of audiences (i.e. employers, employees, education and training providers, learners, small enterprises, etc.). *Group training, Government-wide training and development, conferences, and emergency recall based on individual’s codes. It would be useful if OPM or NICE would facilitate an emergency “triage” team based on several of the critical cyber positions to assist Departments on a temporary basis (in the fashion that GSA established 18F support).*
5. Describe the potential benefits or challenges experienced when aligning the NICE Framework more closely with other related standards, guidance, or resources (e.g., NIST Framework for Critical Infrastructure Cybersecurity, NIST Privacy Framework, other NIST Special Publications, etc.). *Challenges are that there are many positions that overlap multiple codes, making reporting challenging (especially if law enforcement sensitive staffs are only willing to aggregate to one top-level code). See #2 and #4 above for positive uses.*
6. Explain if you think the scope of the covered workforce as stated by the NICE Framework needs to be adjusted. *There are certainly HR, financial, personnel security and policy personnel that do not fit exactly into the current framework – expansion to these groups would be beneficial. It is potentially limit the scope of skills development (e.g.; the position can only be full-fill with personnel with exact same code, not a potential code for personnel who would like to transition into that code for their skill development.*
7. Describe any improvements that might be made in the current organization of the NICE Framework and its major components such as Categories, Specialty Areas, Work Roles, Knowledge, Skills, Abilities, and Tasks. *The current configuration and crosswalks to federal positions are difficult as presented in “black and white” standards to adopt. Graphical and storyboard examples or groupings (similar to NICE 1.0’s organization) would assist HR professionals and management in determining needs and assignments more easily. There may not always be sufficient time (when adding multiple positions in government or industry) to refer to a tool/questionnaire to diagnose a code – thus the “quality” of the codes suffer.*

Thanks,
Nick

Nickolous Ward
Chief Information Security Officer
United States Department of Justice