Dear Will,

I hope this email finds you well. Thanks for making us aware of the NIST document referenced in your email below. Please see attached comments/suggestions for your all consideration on the proposed document. Feel free to contact me if you have any questions on my comments/suggestions.

Best regards,

Ismael

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#	Organization	Commentor	Type	Line #	Section	Comment(Include rationale for comment)	NIST Response	Suggested change
1	NRC	I. Garcia	T		1.2	As written, the discussion seems to be missing the point for why the NICE Framework is needed from the standpoint of cyber protection. Therefore, suggest adding the following: "The NICE Framework is intended to help the workforce improve the security and resilience of computer systems and networks. Specifically, the NICE Framework is intended to provide the workforce with the necessary and sufficient knowledge and tools to counter from unsophisticated to large-scale, sophisticated cyber threats."		
2	NRC	I. Garcia	E		1.3.1	Suggest revising the first bullet to include the "KSAs" abbreviation after "Knowledge, Skills, and Abilities" as it is not defined in the text.		
3	NRC	I. Garcia	E		1.3.2	Suggest replacing "Knowledge, Skills, and Abilities" with "KSAs" in the last sentence of the first paragraph.		
4	NRC	I. Garcia	T/E		1.3.3	Suggest adding "and development" at the end of the sentence that reads: "Human resource staffing specialists and guidance counselors can use the NICE Framework as a resource for career exploration." Rationale - The workforce may not only explore a given career but may also want to develop their skills/knowledge for the career they already have.		

5	NRC	I. Garcia	T/E		2.1.2	The last sentence states that: "KSAs and Tasks are now associated with the work roles." However, this statement may be misleading as KSAs and Tasks are also assoicated with each specialty area, but at a higher tier as shown in Figure 1 (Relationships among NICE Framework Components). Therefore, suggest revising the sentence in question as follows to avoid this potential misconception: "KSAs and Tasks are now associated with the work roles at a lower tier as shown in Figure 1."		
6	NRC	I. Garcia	E		2.1.3	For consistency, suggest replacing "knowledge, skills, and abilities (KSAs) and tasks" with "KSAs and Tasks" in the last sentence of the first paragraph.		
7	NRC	I. Garcia	T/E		2.1.4	Suggest revising the last sentence under the "Skill" definition to read as follows [additions in red]: "Skills needed for cybersecurity rely less on physical manipulation of tools and instruments and more on applying tools, frameworks, processes, and controls that have an impact on the cybersecurity posture of an organization, or individual, or both." Rationale - The impact on the cyber security porture could affect both the organization and the individual.		

| 8 | NRC | I. Garcia | T | | | 3.1 | In regards to the proficiency analysis portion of the NICE Framework, the discussion in the section should stress the need for this analysis to be Agile. Considering how the attackers' techniques continoulsy evolve, the proficiency analysis should not follow a traditional static approach (e.g., perform it once a year). Instead, it should follow an Agile approach where the proficiency analysis is continously performed to ensure that the workforce has the necessary and sufficient knowledge and tools to "counter advanced nation state attackers through a mirrored defense, recognizing the adversary as an intelligent, multi agent, self organizing, swarming system of systems. [1]" Reference: 1. "ANTS: A Biologically-Inspired Model for Agile Cyber Defense," E. Crane, 2016. | | |