From: Johnson Anthony
Sent: Friday, December 14, 2018 8:03 AM
To: privacyframework
Subject: Department of the Treasury - Bureau of Engraving and Printing (BEP) Privacy Framework Comments/Recommendations

Good Morning,

On behalf of the Bureau of Engraving and Printing (BEP), the Privacy Compliance Program under the CIO/Office of Critical Infrastructure and Information Technology Security (OCIITS) submits the following comments/recommendations in response to the Privacy Framework Request for Information (RFI) for your consideration:

1) The framework should provide broader approaches to implementing practices and procedures for smaller/resource-challenged agencies. For example, procedures that DHS/DOD can manage effortlessly may over-burden the Patent and Trademark Office or BEP (e.g. entering hundreds of privacy or security controls for low-risk or non-sensitive PII systems);

2) Provide a robust description (or a list) of privacy harms aside from financial/credit-related harms (e.g. embarrassment, reputation, movement or location tracking, etc.). This will assist personnel in assessing, recognizing, and mitigating non-financial risks to data/PII managed by NextGen/emerging technologies or programs;

3) Provide a roadmap that helps agencies reallocate resources (whether human or financial) to more significant risks areas and away from lower risk systems or data;

4) Provide as much guidance as possible regarding Artificial Intelligence (AI) or machine-learning systems and how they may enhance and/or erode privacy; and

5) Provide a recommendation or procedures directly to OMB on how to streamline compliance documentation for low-risk systems or data collections.

Thank you for providing the opportunity for agencies to provide recommendations.