NIST PRIVACY WORKFORCE PUBLIC WORKING GROUP (PWWG)

Co-Chair: Dylan Gilbert, Privacy Policy Advisor, National Institute of Standards and Technology

MEETING MINUTES
Wednesday, October 13, 2021
1:00 P.M. ET – 2:00 P.M. ET

I. INTRODUCTION

The sixth (6th) meeting of the NIST Privacy Workforce Public Working Group (PWWG) convened on Wednesday, October 13, 2021 from 1:00 P.M. ET - 2:00 P.M. ET virtually via Microsoft Teams.

Co-Chair: Dylan Gilbert, Privacy Policy Advisor, National Institute of Standards and Technology, welcomed and thanked the members and Project Teams Leads for their participation. The Co-Chair provided a brief overview of the agenda that included the update of NIST 800-50 (Building a Cybersecurity and Privacy Awareness and Training Program), the PWWG Member Survey, New Business Drop Box, IAPP Conference, the Project Team Poll, and Project Team updates from Project Team 1: Risk Assessment (ID.RA-P) and Project Team 2: Inventory and Mapping (ID.IM-P).

II. PWWG UPDATES

A. NIST 800-50: Building a Cybersecurity and Privacy Awareness and Training Program (formerly *Building an Information Technology Security Awareness and Training Program*)

Co-Chair Dylan Gilbert provided a brief update to the PWWG Membership that NIST has published a Pre-Draft Call for Comments on the NIST 800-50 (Rev. 1) document. The current revision proposes the following:

A. Updating the descriptions of and terminology used for building a security awareness and training program,

B. Incorporating descriptions of and terminology used for building a privacy awareness and training program,

C. Combining content from NIST SP 800-16 into NIST SP 800-50 and producing a single reference document to describe the fundamental elements necessary to develop a security and privacy awareness and training program, and

D. General feedback.

The Call for Comments is currently open until November 5, 2021. For additional details, please visit: https://csrc.nist.gov/publications/detail/sp/800-50/rev-1/draft . The PWWG Membership is encouraged to provide comments.

B. New Business Suggestion Box

The New Business Suggestion Box is currently available on the NIST PWWG Web page[1]. The PWWG Membership may submit suggested Privacy workforce-related topics and issues for open discussion during the NIST PWWG monthly meetings on demand. Submissions may be submitted at any time and if selected, will be included in the agenda for future meetings.

---

[1] NIST Privacy Workforce Working Group Webpage

C. **NIST PWWG MEMBER SURVEY**
It was noted that a NIST PWWG Member Survey was developed to ensure a broad balance of knowledgeable stakeholder representation to engage with the NIST PWWG and its Project Teams. The survey captures information that allows for insight and understanding of the composition of the PWWG Membership, (i.e., expertise, knowledge, sectors, etc.). Survey participation is voluntary and will be used for internal NIST PWWG purposes only. The survey will be distributed to the NIST PWWG Membership via the mailing list when it is available. NIST is targeting November 2021 for circulation.

E. **IAPP Privacy. Security. Risk. 2021 Conference, San Diego, California**
The conference and workshops are hosted by the International Association of Privacy Professionals from October 19, 2021 through October 22, 2021[2]. Listed below are sessions of interest in relation to the NIST PWWG:

Session 1:
- **Join the Team! Insights from NIST's Privacy Workforce Public Working Group**
  - PWWG Co-Chairs Panel will discuss key insights, privacy workforce challenges, lessons learned, and volunteer engagement.
    - Thursday, October 21 (12:00PM – 1:00PM PDT)
    - * *IAPP Conference attendees only

Session 2:
- **Help Wanted: Growing a Workforce for Managing Privacy Risk, Roundtable Discussion**
  - Moderator: Dylan Gilbert, NIST will provide an overview of the PWWG and gather stakeholder input on how NIST can develop resources to address privacy workforce challenges.
    - Thursday, October 21 (2:30PM – 3:30PM PDT)
    - **Free and open to the public

Contact NIST if you would like to set up a meeting at PSR, email: PrivacyFramework@nist.gov.

F. **TASK, KNOWLEDGE, AND SKILL (TKS) STATEMENT REVIEW PROCESS**
Dylan thanked the Project Team Leads and members of Project Team 1: Risk Assessment (ID.RA-P) and Project Team 2: Inventory and Mapping (ID.IM-P) for their leadership, contributions, and participation in the development of the Task, Knowledge, and Skill (TKS) Statements.

Dylan provided a general overview of the development of TKS Statements and stated that the first initial statements were submitted at the end of September for Co-Chair review. The next Co-Chair review is scheduled for Oct 26th. The Co-Chairs will coordinate with the Project Team Leads to review feedback and offer advice on their recommendations.

In the coming weeks, the Project Teams will wrap up and send their final TKS Statements to the NIST PWWG Co-Chairs for review. The PWWG Membership will be able to provide comments regarding the developed TKS Statements at a future date.

Please note the TKS Statement review process below:

---

[2] IAPP Privacy. Security. Risk. Conference

- Step 1: Project Teams review and approve TKS Statements via shared Google Sheet.
- Step 2: Co-Chairs will review, approve, or send back with comments to the Project Team(s) for further review and revision.
- Step 3: Upon final review and approval, the Project Team is dissolved, and the next Privacy Framework Category is assigned to a new Project Team.

D. PROJECT TEAM POLL RESULTS

The Project Team Poll was distributed to the PWWG Membership to determine the next two (2) Privacy Framework Categories. The results determined that the following Categories were of majority interest of the PWWG Membership to commence.

1) GV.PO-P: Governance Policies, Processes, and Procedures
2) CT.PO-P: Data Processing Policies, Processes, and Procedures
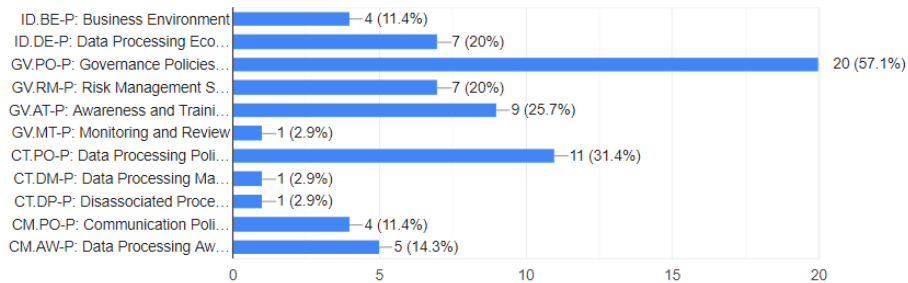
The members discussed and suggested whether the two (2) Categories should be merged into one (1) Category for working purposes. The suggestion was tabled for future discussion amongst the PWWG Membership and the Co-Chairs.

Currently, the NIST PWWG Team is coordinating logistics for participation sign-up, working documents, and the shared drives for the new Project Teams.

III. PROJECT TEAM UPDATES

A. UPDATE OF PROJECT TEAM 1: RISK ASSESSMENT (ID.RA-P) ACTIVITIES

Dylan welcomes the Project Team Co-Leads, and congratulated Lauren Jones on her new position. Project Team Co-Leads, Lauren Jones, Privacy Counsel, Surescripts, LLC, and Lisa McKee Senior Manager Security and Data Privacy, Protiviti, provided a brief background and status of Project Team 1: Risk Assessment (ID.RA-P) Task, Knowledge, and Skill (TKS) Statements.

For reference purposes, the Team is tasked with the development of the TKS Statements for five (5) Subcategories from the NIST Privacy Framework Core V1[3].

IDENTIFY-P (ID-P): Develop the organizational understanding to manage privacy risk for individuals a rising from data processing.

- **Risk Assessment (ID.RA-P):** The organization understands the privacy risks to individuals and how such privacy risks may create follow-on impacts on organizational operations, including mission, functions, other risk management priorities (e.g., compliance, financial), reputation, workforce, and culture.
  - **ID.RA-P1:** Contextual factors related to the systems/products/services and the

---

[3] NIST Privacy Framework Core

data actions are identified (e.g., individuals' demographics and privacy interests or perceptions, data sensitivity and/or types, visibility of data processing to individuals and third parties).
- **ID.RA-P2:** Data analytic inputs and outputs are identified and evaluated for bias.
- **ID.RA-P3**: Potential problematic data actions and associated problems are identified.
- **ID.RA-P4:** Problematic data actions, likelihoods, and impacts are used to determine and prioritize risk.
- **ID.RA-P5:** Risk responses are identified, prioritized, and implemented.

The Project Team Co-Leads stated that Project Team 1 has completed the initial TKS Statements for Subcategories ID.RA-P2 through ID.RA-P5. It was also noted that the team had many discussions on Subcategory ID.RA-P1. During discussions with the Project Team members, it was realized that the Risk Assessment aspect did not include documentation tasks. The team re-examined and discussed examples of how to implement a documentation task to relevant areas.

The Project Team will have further discussions regarding Artificial Intelligence (AI) expertise and analysis to AI related risks. In addition to, including tasks for identifying inputs and evaluating them for potential bias.

The Project Team Co-Leads encouraged NIST PWWG members who are interested in providing further information on this topic, to join the NIST PWWG Project Team 1 Mailing List.

B. **UPDATE OF PROJECT TEAM 2: INVENTORY AND MAPPING (ID.IM-P) ACTIVITIES**
Project Team Co-Lead, Dr. Sarah Lewis Cortes, Privacy Engineering, Netflix, and Mary Potter, Director of Privacy and Research Data Protections, Virginia Tech, provided a brief background and status of Project Team 2: Inventory and Mapping (ID.IM-P) Task, Knowledge, and Skill (TKS) Statements.

For reference purposes, the team is tasked with the development of the Task, Knowledge, and Skill (TKS) Statements for eight (8) Subcategories from the NIST Privacy Framework Core V1[4].

- **IDENTIFY-P (ID-P):** Develop the organizational understanding to manage privacy risk for individuals a rising from data processing.
  - **Inventory and Mapping (ID.IM-P):** Data processing by systems, products, or services is understood and informs the management of privacy risk.
    - **ID.IM-P1:** Systems/products/services that process data are inventoried.
    - **ID.IM-P2:** Owners or operators (e.g., the organization or third parties such as service providers, partners, customers, and developers) and their roles with respect to the systems/products/services and components (e.g., internal, or external) that process data are inventoried.
    - **ID.IM-P3:** Categories of individuals (e.g., customers, employees or prospective employees, consumers) whose data are being processed are inventoried.
    - **ID.IM-P4:** Data actions of the systems/products/services are inventoried.
    - **ID.IM-P5:** The purposes for the data actions are inventoried.

- **ID.IM-P6:** Data elements within the data actions are inventoried.
- **ID.IM-P7:** The data processing environment is identified (e.g., geographic location, internal, cloud, third parties).
- **ID.IM-P8:** Data processing is mapped, illustrating the data actions and associated data elements for systems/products/services, including components; roles of the component owners/operators; and interactions of individuals or third parties with the systems/products/services.

The Project Team Co-Lead, Sarah Cortes, briefly discussed the independent and dependent relationships between the Task, Knowledge, and Skill Statements. The Project Team members decided to acknowledge the high-level Task Statements that apply across the Privacy Framework, to avoid repetition within each Subcategory. The Team focused on Subcategories and identifying and documenting tasks. They decided to finish the Subcategories with TKS Statements. In addition to providing general overall Knowledge and Skill Statements that were applicable across all Subcategories and Tasks that were applicable to all Subcategories.

The Project Team will continue to discuss ID.IM-P4, ID.IM-P5, ID.IM-P6 and ID.IM-P8. It was noted that the Team estimates the TKS Statements will be completed by mid-November.

The Project Team Co-Leads thanked the PWWG and Project Team members for their contributions and comments. The Project Team will continue discussions to ensure that the work is relayed across all sectors and sizes of organizations to assist in implementation processes.

The Project Team Co-Leads encouraged the expertise and perspectives of the NIST PWWG Membership to participate in the review process of the TKS Statements.

IV.   Q & A

- **Question**: Is there a mapping of the Association of International Certified Professional Accountants (AICPS) Privacy Management Framework to the NIST Privacy Framework?

  Answer: Co-Chair, Dylan Gilbert was not aware of one but welcomed a submission to the NIST Privacy Framework Resource Repository[5].

V.   NEXT STEPS & UPCOMING MEETINGS

A. NEXT STEPS
- Project Teams will continue to review and finalize TKS Statements and submit to the NIST PWWG Co-Chairs for review and comment.
- Co-Chairs will continue to review initial TKS Statements and will provide comments back to the Project Teams to discuss and provide a consensus.
  - o Thus far, the Co-Chairs have general recommendations to the PTLs on providing further clarity and detail of the proposed TKS statements and, in some cases, to help draw a clearer connection to privacy risk.
- NIST PWWG Member Survey will be finalized and distributed in the next coming weeks via the

---

[5] NIST Privacy Framework Resource Repository

mailing list. It will be sent to the PWWG Membership in November 2021.
- Further discussions and consensus regarding combining the Project Teams for the following two (2) Categories:
  - ○ GV.PO-P: Governance Policies, Processes, and Procedures
  - ○ CT.PO-P: Data Processing Policies, Processes, and Procedures
- New Business Open Discussion Topics Drop Box is available on the NIST Privacy Workforce Working Group webpage.
- Troubleshooting please reach out to pwwg@nist.gov.

A.   UPCOMING MEETINGS

The upcoming meetings of the NIST PWWG and its Project Teams are noted below. For further information and updated meeting schedules, please visit the PWWG web page.

1) **Project Team 1: Risk Assessment (ID.RA-P)**
   - Thursday, November 4, 2021 — 11:00am ET – 12:00pm ET
   - Wednesday, October 20, 2021 |5:00PM – 6:00PM ET
2) **Project Team 2: Inventory and Mapping (ID.IM-P)**
   - Monday, October 18, 2021 — 12:00pm ET – 1:00pm ET
   - Monday, November 1, 2021 — 12:00pm ET – 1:00pm ET
3) **NIST Privacy Workforce Public Working Group**
   The NIST PWWG Monthly Meeting is the 2nd Wednesday of each month. Meeting dates, minutes, and slides are located on the PWWG website.
   - Wednesday, November 10, 2021 — 1:00pm ET – 2:00pm ET

B.   JOIN MAILING LIST:
- E-mail addresses for members to join/subscribe:
  - Privacy Workforce Working Group (PWWG): PrivacyWorkforceWG+subscribe@list.nist.gov
  - Project Team 1 (PT1): PrivacyWorkforcePT1+subscribe@list.nist.gov
  - Project Team 2 (PT2):PrivacyWorkforcePT2+subscribe@list.nist.gov
- Please be reminded to review adhere to the Mailing List Rules that can be accessed on the NIST PWWG web page.

C.   TROUBLESHOOTING:
If you should have issues with meeting invitations, mailing lists, and/or accessing the Google Drives, please email NIST PWWG Support at PWWG@nist.gov