### NIST Privacy Workforce Public Working Group

Meeting #14 Wednesday, June 8, 2022



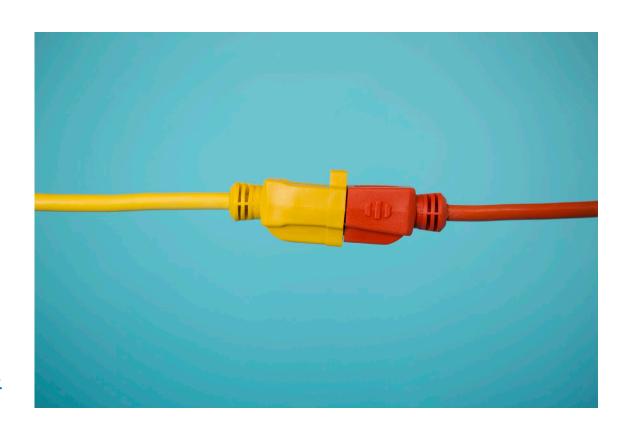
### INTRODUCTION

### PWWG UPDATES

#### **PWWG Updates**

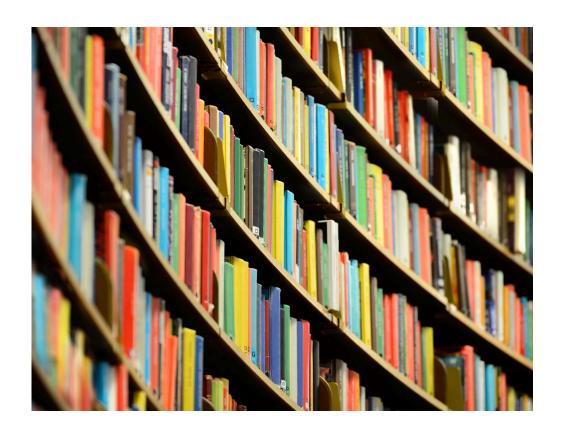
#### Privacy Framework >< PWWG TKS Mapping

- Mapping of completed TKS
   Statements to Privacy Framework
   Core
- Read-only PDFs, accessible to PWWG members via References Folder in shared Google Drives
- Link: <u>PWWG Reference Documents</u>
   <u>Folder Google Drive</u>



## **PWWG Updates**Resources Decision

Upon completion of PWWG TKS Statements, group will reassess whether to initiate a second phase of resource creation.



#### **PWWG Updates**

#### PROJECT TEAM 3: NEW CO-LEAD INTRODUCTION



Alicia Christensen, JD, MS, CIPP/US, CIPM

VP, General Counsel, Chief Compliance Officer at National

Jewish Health

Principal Advisor, Frame Privacy Group

#### **PWWG Updates**

#### PROJECT TEAM 5: CO-LEADS INTRODUCTION



Anshu Gupta
VP, Security and Privacy, CISO
Span.io

Brandi M. Bennett, CIPP-US
Data Privacy and Security
Attorney

### PROJECT TEAM UPDATES

PROJECT TEAM 1: Risk Assessment (ID.RA-P)

## Project Team 1: Risk Assessment (ID.RA-P) Team Co-Leads



Lauren Jones
Privacy Counsel
Surescripts, LLC



**Dr. Lisa McKee**Director of Governance, Risk,
Compliance and Privacy, Hudl

# Project Team 1: Risk Assessment (ID.RA-P) Task, Knowledge, Skill Statements (TKS)

#### Project Team 1:

- Task, Knowledge, and Skill (TKS) Statements
  - Subcategories

Subcategory	Description		
ID.RA-P1	Contextual factors related to the systems/products/services and the 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.		

## Project Team 1: Risk Assessment (ID.RA-P) Progress Update

- Project Team 1 is continuing the review of the PWWG Co-Chairs comments for ID.RA-P1, ID.RA-P3, ID.RA-4, and ID.RA-P5 this month.
- The team has agreed to add (2) additional meetings in (1) in May and (1) in June in order to finalize the TKS statements.

## Project Team 1: Risk Assessment (ID.RA-P) Recurring Meetings

Two meetings each month:

- 1st Thursday of the month | 11:00 AM 12:00 PM EDT
- 3rd Wednesday of the month | 5:00 PM 6:00 PM EDT

#### Next meeting:

Wednesday, June 15, 2022 | 5:00 – 6:00PM EDT

Additional Meeting – June 22, 2022 | 5:00 – 6:00PM EDT

### PROJECT TEAM UPDATES

PROJECT TEAM 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P)

### Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P)

Team Co-Leads



Dan LoPresto
Director, Privacy Compliance
University of Central Florida
(UCF)



Nandita Rao Narla Senior Privacy Program Manager Door Dash



Alicia Christensen, JD, MS, CIPP/US, CIPM

VP, General Counsel, Chief Compliance Officer at National Jewish Health Principal Advisor, Frame Privacy Group

# Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P) Scope of Work

### NIST PWWG Project Team 3: Policies, Processes, and Procedures

Project Team Abbreviation: (PT3)

#### 1) Function: GOVERN-P (GV-P):

- Category (GV.PO-P): Governance Policies, Processes, and Procedures
- Subcategories (6): GV.PO-P1 through GV.PO-P6

#### 2) Function: CONTROL-P (CT-P):

- Category (CT.PO-P): Data Processing Policies, Processes, and Procedures
- Subcategories (4): CT.PO-P1 through CT.PO-P4

#### 3) Function: COMMUNICATE-P (CM-P):

- Category (CM.PO-P): Communication Policies, Processes, and Procedures
- Subcategories (2): CM.PO-P1 and CM.PO-P2

### Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P)

Scope of Work: Privacy Framework

PROJECT TEAM 3 CATEGORIES				
Function	Category	Subcategory		
GOVERN-P (GV-P): Develop and implement the organizational governance structure to enable an ongoing understanding of the organization's risk management priorities that are informed by privacy risk.	Governance Policies, Processes, and Procedures (GV.PO-P): The policies, processes, and procedures to manage and monitor the organization's regulatory, legal, risk, environmental, and operational requirements are understood and inform the management of privacy risk.	GV.PO-P1: Organizational privacy values and policies (e.g., conditions on data processing such as data uses or retention periods, individuals' prerogatives with respect to data processing) are established and communicated.  GV.PO-P2: Processes to instill organizational privacy values within system/product/service development and operations are established and in place.		
		GV.PO-P3: Roles and responsibilities for the workforce are established with respect to privacy.  GV.PO-P4: Privacy roles and responsibilities are coordinated and aligned with third-party		
		stakeholders (e.g., service providers, customers, partners). <b>GV.PO-P5:</b> Legal, regulatory, and contractual requirements regarding privacy are understood and managed. <b>GV.PO-P6:</b> Governance and risk management policies, processes, and procedures address		
CONTROL-P (CT-P): Develop and implement appropriate activities to enable organizations or individuals to manage data with sufficient granularity to manage privacy risks.	Data Processing Policies, Processes, and Procedures (CT.PO-P): Policies, processes, and procedures are maintained and used to manage data processing (e.g., purpose, scope, roles and responsibilities in the data processing ecosystem, and management commitment) consistent with the organization's risk strategy to protect individuals' privacy.	privacy risks.  CT.PO-P1: Policies, processes, and procedures for authorizing data processing (e.g., organizational decisions, individual consent), revoking authorizations, and maintaining authorizations are established and in place.  CT.PO-P2: Policies, processes, and procedures for enabling data review, transfer, sharing or disclosure, alteration, and deletion are established and in place (e.g., to maintain data quality, manage data retention).  CT.PO-P3: Policies, processes, and procedures for enabling individuals' data processing preferences and requests are established and in place.  CT.PO-P4: A data life cycle to manage data is aligned and implemented with the system development life cycle to manage systems.		
communicate-P (cm-P): Develop and implement appropriate activities to enable organizations and individuals to have a reliable understanding and engage in a dialogue about how data are processed and associated privacy risks.	Communication Policies, Processes, and Procedures (CM.PO-P): Policies, processes, and procedures are maintained and used to increase transparency of the organization's data processing practices (e.g., purpose, scope, roles and responsibilities in the data processing ecosystem, and management commitment) and associated privacy risks.	CM.PO-P1: Transparency policies, processes, and procedures for communicating data processing purposes, practices, and associated privacy risks are established and in place.  CM.PO-P2: Roles and responsibilities (e.g., public relations) for communicating data processing purposes, practices, and associated privacy risks are established.		

# Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P) Progress Update

Working on drafting TKS statements for:

#### GV.PO-P: Governance Policies, Processes, and Procedures

 The policies, processes, and procedures to manage and monitor the organization's regulatory, legal, risk, environmental, and operational requirements are understood and inform the management of privacy risk.

# Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P) Next Steps

• PT3 will continue brainstorming TKS Statements for GV.PO-P4: Privacy roles and responsibilities are coordinated and aligned with third-party stakeholders (e.g., service providers, customers, partners). at the next meeting.

# Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P) Recurring Meetings

Biweekly on Thursdays from 1:00 PM EDT to 2:00 PM EDT

Next meeting:

Thursday, June 9, 2022

# Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P) Mailing List Sign-Up



PrivacyWorkforcePT3+subscribe@list.nist.gov

### PROJECT TEAM UPDATES

PROJECT TEAM 4:
Data Processing Ecosystem
Risk Management (ID.DE-P)

### Project Team 4: Data Processing Ecosystem (ID.DE-P) Team Co-Leads



Tahir Latif

Head of Practice - Data Protection,
Artificial Intelligence and Analytics
(APAC & EMEA) Cognizant
Worldwide



**Paul Lanois**Director, Fieldfisher



Anne Connell
Senior Cybersecurity Engineer,
Software Engineering Institute
Carnegie Mellon University

#### Project Team 4: Data Processing Ecosystem (ID.DE-P) Task, Knowledge, Skill Statements (TKS)

#### Project Team 4:

- Task, Knowledge, and Skill (TKS) Statements
  - Subcategories

Subcategory	Description
ID.DE-P1:	Data processing ecosystem risk management policies, processes, and procedures are identified, established, assessed, managed, and agreed to by organizational stakeholders.
ID.DE-P2:	Data processing ecosystem parties (e.g., service providers, customers, partners, product manufacturers, application developers) are identified, prioritized, and assessed using a privacy risk assessment process.
ID.DE-P3:	Contracts with data processing ecosystem parties are used to implement appropriate measures designed to meet the objectives of an organization's privacy program.
ID.DE-P4:	Interoperability frameworks or similar multi-party approaches are used to manage data processing ecosystem privacy risks.
ID.DE-P5:	Data processing ecosystem parties are routinely assessed using audits, test results, or other forms of evaluations to confirm they are meeting their contractual, interoperability framework, or other obligations.

### Project Team 4: Data Processing Ecosystem (ID.DE-P) Progress Update

Currently working on drafting TKS statements for:

- ID.DE-P1: Data processing ecosystem risk management policies, processes, and procedures are identified, established, assessed, managed, and agreed to by organizational stakeholders. - Completed
- **ID.DE-P2**: Data processing ecosystem parties (e.g., service providers, customers, partners, product manufacturers, application developers) are identified, prioritized, and assessed using a privacy risk assessment process.

#### Project Team 4: Data Processing Ecosystem (ID.DE-P) Progress Update - 2

PT4 added 50+ new members in May!

Goals for June work period:

- Finalize initially approved TKS statements for ID.DE-P2
- Continue the development of TKS statements for the ID.DE-P subcategories

## Project Team 4: Data Processing Ecosystem (ID.DE-P) Recurring Meetings

Two meetings each month:

1st & 3<sup>rd</sup> Thursday of the month | 2:00 PM to 3:00 PM EDT

Next meeting:

Thursday, June 16, 2022

## Project Team 4: Data Processing Ecosystem (ID.DE-P) Mailing List Sign-Up



PrivacyWorkforcePT4+subscribe@list.nist.gov

# NEXT STEPS & UPCOMING MEETINGS

#### Privacy Workforce Public Working Group Next Steps

- PT1 works with Co-Chairs to finalize TKS Statements.
   Targeting completion around late June/early July
- PT3 and PT4 continue to develop TKS Statements for initial Co-Chair review
- NIST spins up PT5

# Privacy Workforce Public Working Group Upcoming Meetings

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Project Team 1: Risk Assessment (ID.RA-P)
    Wednesday, June 15, 2022 | 5:00pm - 6:00pm EDT
    Wednesday, June 22, 2022 | 5:00pm - 6:00pm EDT
Project Team 2: Inventory and Mapping (ID.IM-P)
    Completed
Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CM.PO-P, CT.PO-P)
    Thursday, June 9, 2022 | 1:00pm - 2:00pm EDT
    Thursday, June 23, 2022 | 1:00pm - 2:00pm EDT
Project Team 4: Data Processing Ecosystem Risk Management (ID.DE-P)
    Thursday, June 16, 2022 | 2:00pm - 3:00pm EDT
    Thursday, July 7, 2022 | 2:00pm - 3:00pm EDT
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Wednesday, July 13, 2022 | 1:00pm - 2:00pm EDT

NIST Privacy Workforce Public Working Group

<sup>\*</sup> For updated meeting schedules see the <u>PWWG web page</u>.

## Privacy Workforce Public Working Group Join Our Mailing Lists

- Privacy Workforce Working Group (PWWG):
   <u>PrivacyWorkforceWG+subscribe@list.nist.gov</u>
- Project Team 3 (PT3): <u>PrivacyWorkforcePT3+subscribe@list.nist.gov</u>
- Project Team 4 (PT4): <a href="mailto:PrivacyWorkforcePT4+subscribe@list.nist.gov">Project Team 4 (PT4): <a href="mailto:PrivacyWorkforcePT4+subscribe@list.nist.gov">PrivacyWorkforcePT4+subscribe@list.nist.gov</a>
- Project Team 5 (PT5): PrivacyWorkforcePT5+subscribe@list.nist.gov
- All mailing lists are moderated

# Privacy Workforce Public Working Group Troubleshooting

• Email questions to <a href="mailto:pwwg@nist.gov">pwwg@nist.gov</a>