NIST Privacy Workforce Public Working Group

Meeting #19
Wednesday, November 9, 2022

NIST | NATIONAL INSTITUTE OF STANDARDS AND TECHNOLOGY U.S. DEPARTMENT OF COMMERCE

INTRODUCTION

PWWG Co-Chairs

Dylan Gilbert
Privacy Policy
Advisor
*National Institute
of Standards and
Technology*

Doug Forman
Certification
Director
*International
Association of
Privacy
Professionals*

**Mary N. Chaney,
Esq., CISSP, CIPP/US**
Managing Attorney
*The Law Offices of
Mary N. Chaney,
PLLC*

Melanie Ensign
Founder & CEO
Discernable, Inc

Welcome to our new PWWG Co-Chair, Doug Forman!

Thank you, Trevor!

NATIONAL INSTITUTE OF STANDARDS AND TECHNOLOGY

CERTIFICATE OF APPRECIATION

This Certificate of Appreciation is Presented to:

Trevor Hughes

In Recognition of Your Dedication and Outstanding Contribution as a Co-Chair to the

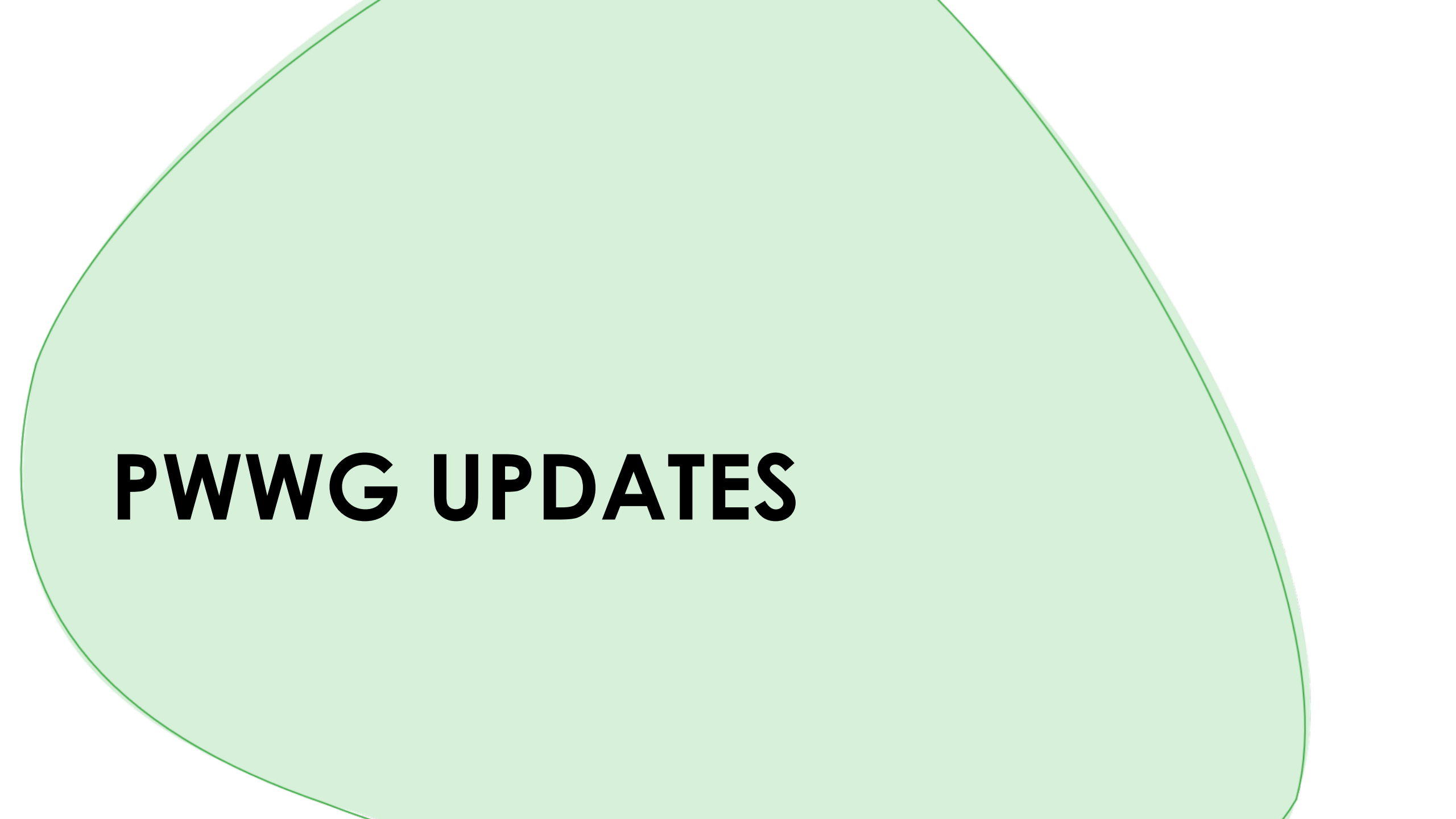Privacy Workforce Public Working Group

October 18, 2022

Date

Naomi Lefkovitz

Naomi Lefkovitz
Senior Privacy Policy Advisor
Manager, Privacy Engineering Program

NIST | INFORMATION TECHNOLOGY LABORATORY

PWWG UPDATES

PWWG Updates
ID.RA-P2: RISK ASSESSMENT (ID.RA-P)

- **ID.RA-P2:** Data analytic inputs and outputs are identified and evaluated for bias

- Target January timeline

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
DoorDash

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 (PT3):
Policies, Processes, and Procedures

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

NIST Privacy Framework Core		
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
		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).
		GV.PO-P5: Legal, regulatory, and contractual requirements regarding privacy are understood and managed.
		GV.PO-P6: Governance and risk management policies, processes, and procedures address privacy risks.
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.	CT.PO-P1: Policies, processes, and procedures for authorizing data processing (e.g., organizational
		CT.PO-P2: Policies, processes, and procedures for enabling data review, transfer, sharing or disclosure,
		CT.PO-P3: Policies, processes, and procedures for enabling individuals' data processing preferences and
		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

Planned work for November/December:

- PT3 will complete review of Co-Chair feedback for TKS Statements for GV.PO-P5

- PT3 will begin review of Co-Chair comments for GV.PO-P6

- The team will begin drafting TKS Statements for subcategories in CT.PO-P: Data Processing Policies, Processes, and Procedures.

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 ET to 2:00 PM ET

Next meeting:

Thursday, November 10, 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 (PT4):
- **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.

- **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

Goals for this work period:

- Complete drafting TKS statements for ID.DE-P1 and send to Co-Chairs for review.

- Awaiting Co-Chair feedback on TKS Statements for ID.DE-P2.

- Continue the development of TKS statements for the remaining ID.DE-P subcategories.

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

Meetings each month:

- 1st & 3rd Thursday | 2:00 PM to 3:00 PM ET

- Next meeting:

  Thursday, November 17, 2022 | 2:00 PM – 3:00 PM ET

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

 PrivacyWorkforcePT4+subscribe@list.nist.gov

PROJECT TEAM UPDATES

PROJECT TEAM 5:
Business Environment (ID.BE-P)

Project Team 5: Business Environment (ID.BE-P)
Team Co-Leads

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

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

Project Team 5: Business Environment (ID.BE-P)
Task, Knowledge, Skill Statements (TKS)

Project Team 5 (PT5):
- **Task, Knowledge, and Skill (TKS) Statements**
  - **Subcategories**

Subcategory	Description
ID.BE-P1:	The organization's role(s) in the data processing ecosystem are identified and communicated.
ID.BE-P2:	Priorities for organizational mission, objectives, and activities are established and communicated.
ID.BE-P3:	Systems/products/services that support organizational priorities are identified and key requirements communicated.

Project Team 5: Business Environment (ID.BE-P)
Goals for October/November

Goals for this work period:

- Complete drafting Skill Statements for ID.BE-P1
- Review Co-Chair feedback for ID.BE-P1 Task and Knowledge Statements when Co-Chairs complete their review.
- Begin drafting TKS Statements for ID.BE-P2.

Project Team 5: Business Environment (ID.BE-P)
Membership

Project Team 5 currently has the fewest number of members and is looking for more participants to join this effort. If you are available to join PT5 to contribute your expertise please email: PrivacyWorkforcePT5+subscribe@list.nist.gov

Project Team 5: Business Environment (ID.BE-P)
Recurring Meetings

Two meetings each month:

- Biweekly on Tuesdays | 1:00 PM to 2:00 PM ET

- Next meeting:

  Tuesday, November 22, 2022 | 1:00 PM – 2:00 PM ET

Project Team 5: Business Environment (ID.BE-P)
Mailing List Sign-Up

PrivacyWorkforcePT5+subscribe@list.nist.gov

Open Discussion

Why Employers Should Embrace Competency-Based Learning in Cybersecurity
October 25, 2022
By: Marni Baker-Stein, Bridgett Paradise and Rodney Petersen

NEXT STEPS & UPCOMING MEETINGS

Privacy Workforce Public Working Group
Next Steps

- NIST PWWG team will update TKS Inventory and Mapping documents with ID.RA-P2 Statements – Goal: January

- PT3 will finalize review of Co-Chair Comments for GV.PO-P TKS Statements.

- PT4 will submit TKS Statements for ID.DE-P1 for Co-Chair review, and begin review of comments for ID.DE-P2.

- PT5 will complete drafting TKS Statements for ID.BE-P1 and begin work on ID.BE-P2

Privacy Workforce Public Working Group
Upcoming Meetings

Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CM.PO-P, CT.PO-P)
Thursday, November 10, 2022 | 1:00pm – 2:00pm ET

Project Team 4: Data Processing Ecosystem Risk Management (ID.DE-P)
Thursday, November 17, 2022 | 2:00pm – 3:00pm ET

Project Team 5: Business Environment (ID.BE-P)
Tuesday, November 22, 2022 | 1:00pm – 2:00pm ET

NIST Privacy Workforce Public Working Group
Wednesday, January 11, 2022 |1:00pm – 2:00pm ET
No meeting in December.

* For updated meeting schedules see the PWWG web page.
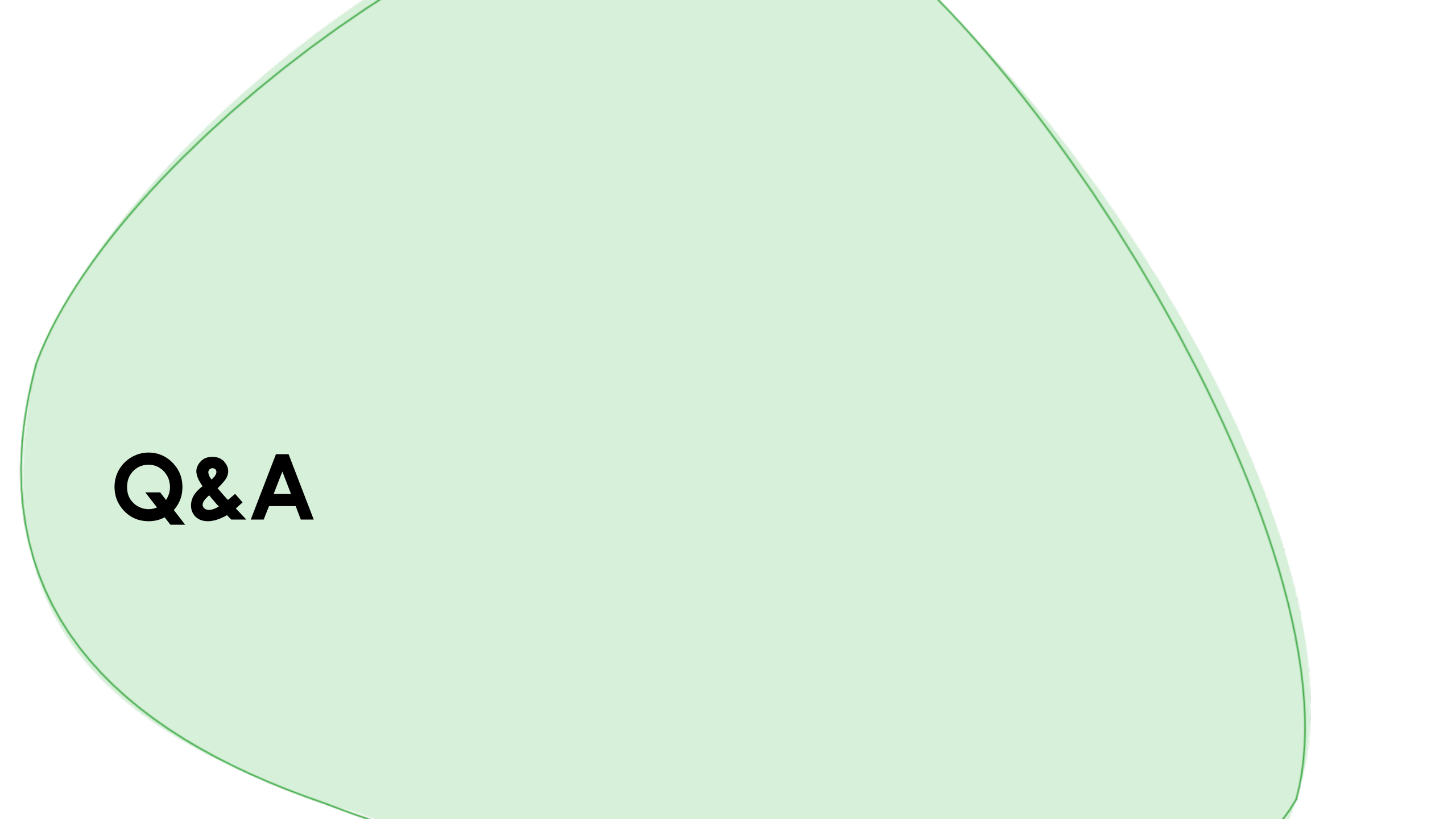
Privacy Workforce Public Working Group
Join Our Mailing Lists

- Privacy Workforce Working Group (PWWG):
PrivacyWorkforceWG+subscribe@list.nist.gov

- Project Team 3 (PT3):PrivacyWorkforcePT3+subscribe@list.nist.gov
- Project Team 4 (PT4):PrivacyWorkforcePT4+subscribe@list.nist.gov
- Project Team 5 (PT5):PrivacyWorkforcePT5+subscribe@list.nist.gov

- **All mailing lists are moderated**

Privacy Workforce Public Working Group
Troubleshooting

- Email questions to pwwg@nist.gov

Q&A