NIST Privacy Workforce Public Working Group

Meeting #22
Wednesday, April 12, 2023

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

PWWG UPDATES

PWWG Updates
Progress to Date

- **Completed Project Teams:**
  - **Project Team 1:** Risk Assessment (ID.RA-P)
  - **Project Team 2:** Inventory and Mapping (ID.IM-P)

- **Active Project Teams:**
  - **Project Team 3:** Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P)
  - **Project Team 4:** Data Processing Ecosystem Risk Management (ID.DE-P)
  - **Project Team 5:** Business Environment (ID.BE-P)

- **TKS Documents** (Inventory Document and Mapping Document)

2023 Work: Phase II and III

2023 Work: Phase II and III
Member Survey Results

(1) **Risk Management Strategy**

(2) **Awareness and Training**

(3) **Monitoring and Review**

(4) **Data Processing Management**

(5) **Disassociated Processing**

(6) **Data Processing Awareness**

Indicate your level of interest for the following NIST Privacy Framework Categories.
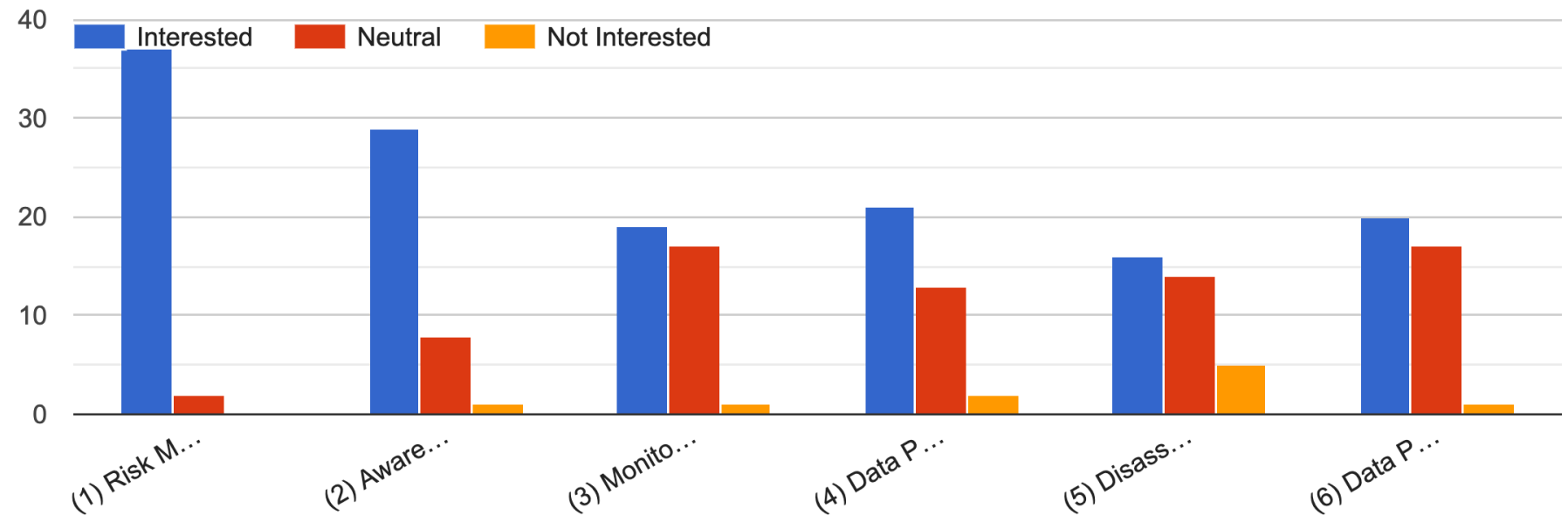
2023 Work: Phase II and III
Project Team Assignments -1

Option 1 – Original Proposal

3 Months (May – July) and 14 Subcategories

(1) Risk Management Strategy (GV.RM-P) - 3 Subcategories
(2) Awareness and Training (GV.AT-P) - 4 Subcategories
(3) Monitoring and Review (GV.MT-P) - 7 subcategories

5 Months (August – December) and 23 Subcategories

(4) Data Processing Management (CT.DM-P) - 10 Subcategories
(5) Disassociated Processing (CT.DP-P) - 5 Subcategories
(6) Data Processing Awareness (CM.AW-P) - 8 Subcategories

2023 Work: Phase II and III
Project Team Assignments - 2

Option 2 – Based on Interest

4 Months (May – August) and 17 Subcategories

(1) Risk Management Strategy (GV.RM-P) - 3 Subcategories
(2) Awareness and Training (GV.AT-P) - 4 Subcategories
(4) Data Processing Management (CT.DM-P) - 10 Subcategories

4 Months (September – December) and 20 Subcategories

(3) Monitoring and Review (GV.MT-P) - 7 subcategories
(5) Disassociated Processing (CT.DP-P) - 5 Subcategories
(6) Data Processing Awareness (CM.AW-P) - 8 Subcategories

2023 Work: Phase II and III
Leads Volunteers!

(1) Risk Management Strategy (GV.RM-P)

(2) Awareness and Training (GV.AT-P)

(3) Monitoring and Review (GV.MT-P)

(4) Data Processing Management (CT.DM-P)

(5) Disassociated Processing (CT.DP-P)

(6) Data Processing Awareness (CM.AW-P)

Interested in leading? Email: pwwg@nist.gov
- **Name**
- **Preferred email address**
- **Which Project Team(s) you'd like to lead**
- **Link to bio or LinkedIn page**

Member Survey
Recommendations

Note: Lots of support for the changes we will be implementing going forward √

o More conference calls/meetings

o More emphasis/information on member expectations for onboarded members

o Time caught up in whether to use a particular word vs another word. Focus on overarching activities and then have someone (or a group of someone's) take a pass at wordsmithing later.

o Schedule calls for participants in Asia at a more friendly time. Most calls happen in the middle of the night for us here in Asia.

o Implement reward and recognition (e.g., Credly badge)

o Provide some sort of letter or certificate or anything that helps us document our efforts for our employers!

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 are 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).
		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

- **Accomplishments (Completed Subcategories)**
  - Completed GV.PO-P1 – GV.PO-P6
  - Completed review of Co-Chair feedback for TKS Statements for GV.PO-P1 - GV.PO-P6
  - Completed CT.PO-P1 - CT.PO-P4 and sent for Co-Chair review.
  - Began drafting Statements for CM.PO-P1

- **Challenges**
  - Time. Managing group discussions such that we remain focused on TKS statements related and aligned with Subcategory statements as well as meet our April 30 deadline to complete our scope.

- **Lessons Learned**
  - Lessons Learned: To gain efficiency, Co-Leads drafting TKS statements in advance of the group meeting then in group discussion we refine the TKS statements.

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

- **Current Status**
  - Currently working on drafting TKS statements for :
    - **CM.PO-P:** Communication Policies, Processes, and Procedures.
    CM.PO-P1: Transparency policies, processes, and procedures for communicating data processing purposes, practices, and associated privacy risks are established and in place.

- **Goals for this work period:**
  - Complete drafting TKS statements for CM.PO-P1
  - Begin drafting TKS statements for CM.PO-P2

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, April 13, 2023**

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

- **Accomplishments (Completed Subcategories)**
  - Completed drafting TKS Statements for all ID.DE-P Subcategories!
  - Submitted ID.DE-3, ID.DE-P4, ID.DE-P5 to PWWG Co-Chairs for review.

Project Team 4: Data Processing Ecosystem (ID.DE-P)
Goals for April

- **Current Status**
  - Reviewing Co-Chair comments for ID.DE-P1 & ID.DE-P2.
  - Awaiting Co-Chair feedback for ID.DE-P3, ID.DE-P4, & ID.DE-P5.

- **Goals for this work period:**
  - Complete Co-Lead review of Co-Chair comments for ID.DE-P1, ID.DE-P2.
  - Begin review of ID.DE-P3, ID.DE-P4, ID.DE-P5 Co-Chair comments.

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

Meetings each month:

- Biweekly on Thursdays **|** 2:00 PM to 3:00 PM ET

- Next meeting:

 Thursday, April 20, 2023 | 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

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

Thank you, Anshu!

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

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

- **Project Team 5 (PT5):**
  - **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)
Progress Update

- **Accomplishments (Completed Subcategories)**
  - Completed drafting TKS Statements for all ID.BE-P Subcategories!
  - Submitted ID.BE-P1, ID.BE-P2, and ID.BE-P3 to PWWG Co-Chairs. (Awaiting review)

Project Team 5: Business Environment (ID.BE-P)
Goals for April

- **Current Status**
  - Awaiting Co-Chair feedback.

- **Goals for this work period:**
  - Review Co-Chair feedback for ID.BE-P1, ID.BE-P2, and ID.DE-P3 when Co-Chairs complete their review.

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

- Two meetings each month:

    - Bi-weekly on Tuesdays **|** 1:00 PM to 2:00 PM ET

- Next meeting(s):

    - **Tuesday, April 18, 2023 | 1:00 PM – 2:00 PM ET**
    - **Tuesday, April 25, 2023 | 1:00 PM – 2:00 PM ET (if needed)**

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

Project Team 5 is currently 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

NEXT STEPS & UPCOMING MEETINGS

Privacy Workforce Public Working Group
Upcoming Meetings

Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CM.PO-P, CT.PO-P)
Thursday, April 13, 2023 | 1:00pm – 2:00pm ET

Project Team 4: Data Processing Ecosystem Risk Management (ID.DE-P)
Thursday, April 20, 2023 | 2:00pm – 3:00pm ET

Project Team 5: Business Environment (ID.BE-P)
Tuesday, April 18, 2023 | 1:00pm – 2:00pm ET

NIST Privacy Workforce Public Working Group
Wednesday, May 10, 2023 |1:00pm – 2:00pm ET

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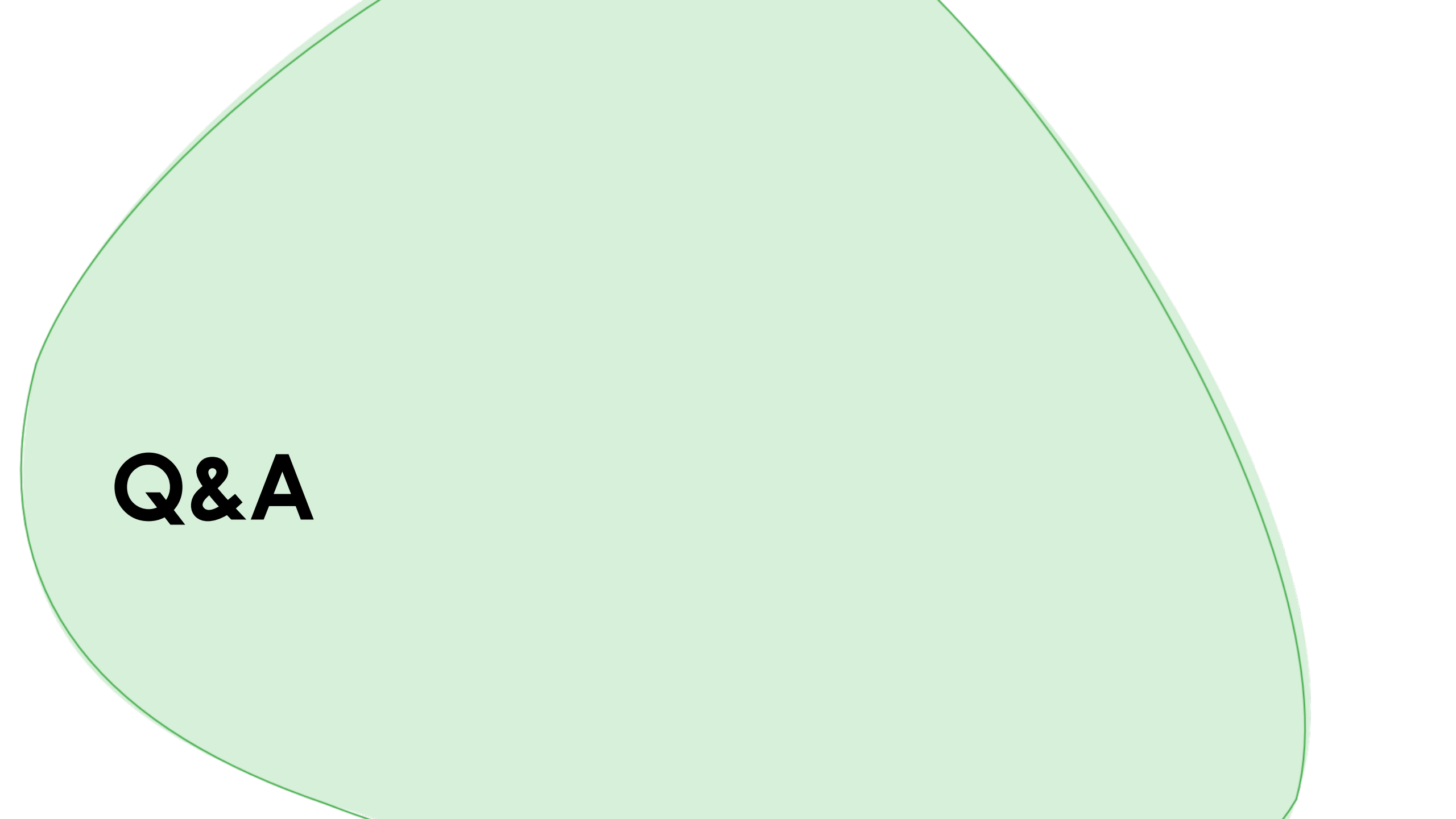
Privacy Workforce Public Working Group
Join Our Mailing Lists

- 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