NIST PRIVACY WORKFORCE PUBLIC WORKING GROUP (PWWG)
Co-Chair: Dylan Gilbert, NIST Privacy Policy Advisor

MONTHLY MEETING MINUTES
Wednesday, October 11, 2023
1:00 P.M. ET – 2:00 P.M. ET

I. INTRODUCTION

The 28th meeting of the National Institute of Standards and Technology (NIST) Privacy Workforce Public Working Group (PWWG) convened on Wednesday, October 11th from 1:00 P.M. - 2:00 P.M. ET virtually via Microsoft Teams. There were 42 attendees.

The PWWG provides a forum for participants from the public, including private industry, the public sector, academia, and civil society, to create the content of the NIST Privacy Workforce Taxonomy. The PWWG is tasked with creating Task, Knowledge, and Skill (TKS) Statements aligned with the [NIST Privacy Framework](#) and the National Initiative for Cybersecurity Education (NICE) [Workforce Framework for Cybersecurity](#).

PWWG Co-Chair, Dylan Gilbert, welcomed attendees and Project Teams Co-Leads. Co-Chair Doug Forman was also present on the call.

Dylan was happy to have had the opportunity to meet a few members of the PWWG at the IAPP PSR conference in San Diego in early October. The NIST PWWG Team held a PWWG Roundtable at the event which was well received. Dylan will give a report out on the working session at a future PWWG meeting.

II. PWWG UPDATE

A. TKS COMPILATION INVENTORY AND MAPPING DOCUMENTS

The PWWG Team recently released Version 5.0 of the [TKS Compilation Inventory](#) and [TKS Compilation Mapping](#) documents. The TKS Inventory is an alphabetic listing of all Tasks, Knowledge, and Skill Statements. The TKS Mapping shows the TKS Statements at the Project Team level, listed by Subcategory. There are currently more than 600 TKS Statements, approximately 200 Tasks, Knowledge, and Skill Statements, with slightly fewer Knowledge Statements.

Dylan and the PWWG Team spent time during August and September taking a deep dive into the TKS Statements that have been approved thus far, applying some conformity rules, and standardizing the final Statements which were included in Version 5.0.

Dylan encouraged all attendees to look at the TKS Inventory and Mapping documents online to get a sense of what the PWWG has produced to date. The PWWG Team intends to release the TKS Inventory as a public draft for comment once all Project Teams have completed their work, so the current TKS Statements are still not yet considered final.

The next step for the NIST PWWG Team is to work on a Knowledge and Skills Baseline, which will incorporate foundational Knowledge and Skill Statements that are applicable across the Privacy Framework Core. This information will be included somewhere in the final taxonomy, most likely as part of the front matter and/or an appendix.

Some examples of baseline Knowledge and Skills:

- Knowledge of privacy laws, regulations, standards, and best practices and skill in applying them.
- Collaboration and communication skills.

Dylan encouraged all PWWG members to weigh in on what the final Taxonomy should look like when the

draft is published. Any comments received will be adjudicated and may be incorporated into the final version of the Taxonomy. The target for completion to publish the PWWG Taxonomy, Version 1.0 is mid-year in 2024.

B.   TIMELINE UPDATE

Dylan discussed the timeline for completion of the TKS Statements and the revised schedule for the launch of the final Project Teams. Project Teams six through eight are expected to complete their work in the coming weeks. Project Team 8 will take a bit longer than the other two teams, with ten Subcategories to complete.

The remaining Subcategories will be divided into three final Project Teams which are projected to run from November through March, 2024.

> PT9 Data Processing Awareness (CM.AW-P) - 8 Subcategories
> PT10 Monitoring and Review (GV.MT-P) - 7 subcategories
> PT11 Disassociated Processing (CT.DP-P) - 5 Subcategories

Call for Project Team Co-Leads

Dylan invited any attendee who has an interest in becoming a Co-Lead for one of the remaining Project Teams to send their name, email address, and LinkedIn or other biographic info/CV to NIST at pwwg@nist.gov for consideration. Being a Co-Lead is a larger time commitment than being a Project Team member. The expectation is that Co-Leads will attend all Project Team meetings as well as additional Co-Lead meetings to pre-draft TKS Statements and review Co-Chair feedback. Co-Leads also attend the monthly PWWG meeting to give a status update. If anyone would like more information, they can reach out to the PWWG Team at pwwg@nist.gov.

C.   ORIENTATION VIDEO UPDATE

Dylan provided an update on the status of the PWWG Orientation Video. PWWG members expressed an interest earlier in the year for the NIST Team to create an on-demand Project Team orientation video. The video will show the basics of what you need to know to get up and running on a PWWG Project Team. The NIST Team had to make some changes and re-record the video, but it is almost ready, and it will be posted on the PWWG webpage by next month, in time for the launch of the new Project Teams.

The minutes and slide decks from all of the PWWG Meetings are posted on the NIST PWWG Webpage. The meeting minutes and slide decks from all Project Team meetings are posted on the respective team's Google Drive.

D.   COMPLETION OF ID.RA-P2 TKS STATEMENTS

Dylan announced that he has been working with the NIST AI team to finalize the TKS Statements for Subcategory ID.RA-P2. He expects to be able to include ID.RA-P2 TKS Statements in the next release of the TKS Inventory and Mapping documents.

III.   Project Team Updates

A.   UPDATE OF PROJECT TEAM 6: RISK MANAGEMENT STRATEGY

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.

- **Risk Management Strategy (GV.RM-P)**: The organization's priorities, constraints, risk tolerances, and

assumptions are established and used to support operational risk decisions.

- o **GV.RM-P1:** Risk management processes are established, managed, and agreed to by organizational stakeholders.
- o **GV.RM-P2**: Organizational risk tolerance is determined and clearly expressed.
- o **GV.RM-P3**: The organization's determination of risk tolerance is informed by its role(s) in the data processing ecosystem.

Project Team 6 (PT6) Co-Lead, Dana Garbo, Medline, gave the update for the team. Ms. Garbo began by reiterating Dylan's point regarding the job of being a team Co-Lead, noting that while it is a lot of work, she feels that is a great opportunity to be able to steer a consensus-based process. She noted that Co-Leads do receive support from the NIST PWWG Team. She also encouraged attendees to join Project Teams as members if they are not able to commit to being Co-Leads.

PT6 has completed review of TKS Statements for the first two Subcategories and have sent the completed Statements to the Co-Chairs for review. They are hoping to complete the final Subcategory, GV.RM-P3, in the next couple of meetings.

Dana stressed the importance of the Risk Management Strategy Category because it is about governance and risk management. She is bullish on the NIST Privacy Framework because, with the recent tsunami of emergent privacy laws and a new focus on privacy by regulators, and leading-edge technologies like Generative AI, she believes that it does not make sense to pursue a pure compliance-based approach. Even where there's an appetite to build a comprehensive, robust privacy program, it can't be done overnight. You have to find a standards-based approach which she believes is the beauty of this Privacy Framework.

Dylan asked Dana if she felt that there is any similarity in the third Subcategory to the first two, and if they will be able to leverage some of the work they have already completed. Ms. Garbo believes that there GV.RM.P3 will be a little easier than the first two Subcategories since the Team has now figured out the level of granularity and which Knowledge and Skills belong in the baseline or is covered elsewhere in the Core.

Ms. Garbo noted that the team is still open to new members who would like to help.

B. **UPDATE OF PROJECT TEAM 7: Awareness and training (GV.AT-P)**

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.

- **Awareness and Training (GV.AT-P):** The organization's workforce and third parties engaged in data processing are provided privacy awareness education and are trained to perform their privacy-related duties and responsibilities consistent with related policies, processes, procedures, and agreements and organizational privacy values.

  - o **GV.AT-P1**: The workforce is informed and trained on its roles and responsibilities.
  - o **GV.AT-P2**: Senior executives understand their roles and responsibilities.
  - o **GV.AT-P3**: Privacy personnel understand their roles and responsibilities.
  - o **GV.AT-P4**: Third parties (e.g., service providers, customers, partners) understand their roles and responsibilities.

Project Team 7 (PT7) Co-Lead, Ivy Orecchio, provided the team update for PT7. The team has completed all of the TKS Statements for the four Subcategories in GV.AT-P. The Co-Chairs provided feedback last month for the first Subcategory and PT7 is waiting for the Co-Chairs to review the remaining TKS Statements.

PT7 will not meet for their next scheduled meeting but will meet at a later time if there are any questions from the Co-Chairs that require Team discussion.

C. UPDATE OF PROJECT TEAM 8: DATA PROCESSING MANAGEMENT (CT.DM-P)

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 Management (CT.DM-P)**: Data are managed consistent with the organization's risk strategy to protect individuals' privacy, increase manageability, and enable the implementation of privacy principles (e.g., individual participation, data quality, data minimization).

  - o **CT.DM-P1**: Data elements can be accessed for review.
  - o **CT.DM-P2**: Data elements can be accessed for transmission or disclosure.
  - o **CT.DM-P3**: Data elements can be accessed for alteration.
  - o **CT.DM-P4**: Data elements can be accessed for deletion.
  - o **CT.DM-P5**: Data are destroyed according to policy.
  - o **CT.DM-P6**: Data are transmitted using standardized formats.
  - o **CT.DM-P7**: Mechanisms for transmitting processing permissions and related data values with data elements are established and in place.
  - o **CT.DM-P8**: Audit/log records are determined, documented, implemented, and reviewed in accordance with policy and incorporating the principle of data minimization.
  - o **CT.DM-P9:** Technical measures implemented to manage data processing are tested and assessed.
  - o **CT.DM-P10**: Stakeholder privacy preferences are included in algorithmic design objectives and outputs are evaluated against these preferences.

Project Team 8 (PT8) Co-Lead, Nikita Samarin, provided the update. PT8 is currently working on TKS Statements for CT.DM-P6. Nikita noted there are ten different Subcategories but the first four are very similar in that they concern accessing data elements. PT8 chose to jump over Subcategories CT.DM-P2 through P4 until they have received all of the comments from the Co-Chairs. They expect to be able to leverage the work done in CT.DM-P1 in those subsequent Subcategories.

PT8 completed the TKS Statements for CT.DM-P5 and sent those to the Co-Chairs for review. The early feedback received from the Co-Chairs has been very useful in working on the later Subcategories.

Dylan noted that Subcategory CT.DM-P10 (Stakeholder privacy preferences are included in algorithmic design objectives and outputs are evaluated against these preferences.) has an 'AI flavor' to it and the PWWG Team is considering asking the NIST AI Team to weigh in on this Subcategory as they did with ID.RA-P2.

Dylan reminded all Project Team members that the intent is for work to happen outside of team meetings. All members are encouraged to review and submit comments in the Google Workbooks between meetings so that the teams can discuss these ideas during the scheduled meetings.

IV. Q & A

V. NEXT STEPS & UPCOMING MEETINGS

A. NEXT STEPS

Join a project team! The mailing lists are now live. Sign up for any team or all of teams! The team Leads will soon send out a welcome note via the Google Group mailing list.

- PT6 (GV.RM-P): PrivacyWorkforcePT6+subscribe@list.nist.gov
- PT7 (GV.AT-P): PrivacyWorkforcePT7+subscribe@list.nist.gov
- PT8 (CT.DM-P): PrivacyWorkforcePT8+subscribe@list.nist.gov

B. UPCOMING MEETINGS

The upcoming meetings of the NIST PWWG and its Project Teams are noted below. For further information, including updated meeting schedules, meeting minutes, agendas, and slide deck please visit the [PWWG web page](#).

> **Project Team 6 (PT6)**
> - Next Meeting: Thursday, October 19, 2023 | 1:00pm – 2:00pm ET
>
> **Project Team 7 (PT7)**
> - Third Meeting: As needed – TBD.
>
> **Project Team 8 (PT8)**
> - Third Meeting: Thursday, October 12, 2023 | 11:00am – 12:00pm ET
>
> **NIST Privacy Workforce Public Working Group**
> - Wednesday, October 8, 2023 | 1:00pm – 2:00pm ET

C. NEW BUSINESS OPEN TOPICS

New Business Open Discussion Topics Drop Box is available on the [NIST Privacy Workforce Working Group](#) webpage. If you are interested in presenting a business topic during a PWWG Monthly Meeting, please visit the webpage noted above.

D. TROUBLESHOOTING

If you have any technical issues with meeting invitations, mailing lists, and/or accessing the Google Drives, please email NIST PWWG Support at [PWWG@nist.gov.](mailto:PWWG@nist.gov)

E. JOIN MAILING LIST

To join one of the Project Teams you must subscribe to its associated mailing list. All mailing lists are moderated. Please be reminded to adhere to the Mailing List Rules that can be found on the [NIST Privacy Workforce Working Group](#) website.

- PWWG: PrivacyWorkforceWG+subscribe@list.nist.gov
- PT6 (GV.RM-P): PrivacyWorkforcePT6+subscribe@list.nist.gov
- PT7 (GV.AT-P): PrivacyWorkforcePT7+subscribe@list.nist.gov
- PT8 (CT.DM-P): PrivacyWorkforcePT8+subscribe@list.nist.gov