



NIST

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The IEEE Standards Association (IEEE-SA) applauds the efforts of the NIST initiative to develop Privacy Engineering guidance for consideration of engineers and designers who implement information systems that engage with personal data. IEEE-SA welcomes the opportunity to comment on the National Institute of Standards and Technology (NIST) draft Privacy Engineering Objectives and Risk Model.

IEEE-SA contributes the following comments to the draft Privacy Engineering Objectives and Risk Model.

- IEEE-SA understands that the scope of the NIST Privacy Engineering initiative is to provide guidance to developers and designers of information systems that handle personal information. IEEE-SA suggests that it may be beneficial to include additional examples of the intended application of NIST guidance.
- Given the absence of over-arching US Federal policy with regard to personal data management, the NIST Privacy Engineering objectives may assume that a reasonable level of organizational policy will provide an authoritative direction for the implementation of the objectives. This may manifest challenging development environment impacted by a “co-mingling” of policy with engineering considerations.
- The privacy objective triad contains assumptions that services will collect personal data. It may be beneficial to represent privacy concepts such as data minimization and proportionality. Data minimization asserts that an organization should collect only the data necessary to perform given transaction.
- The identification of “problematic data action” examples may be contrary to the Privacy Engineering objectives of NIST. With regard to industry adoption and risk implication of the NIST guidance, it may be beneficial to consider where and how such identified actions may be captured as informative to appropriate parties.

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