From: Adriaans, Rachel <radriaans@hsnsudbury.ca>
Sent: Monday, September 23, 2019 3:15 PM
To: privacyframework <privacyframework@nist.gov>
Subject: NIST Privacy Framework: Preliminary Draft Comments

Good afternoon,

Please accept the attached comments, relative to the NIST Privacy Framework: Preliminary Draft Comments.

Thank you very much for creating this important, much-needed privacy framework!

Rachel

<div align="center">NIST Privacy Framework Preliminary Draft Comments</div>

- Consider the use of "Sustain" as a Core Function to focus on monitoring, logging, auditing, and communicating.
    - Auditing and logging is currently touched upon as a "CT.DM-P8: Subcategory" with monitoring changing risks as a "GV.MT-P Category".
    - "Communicate" can be switched to a Category under "Sustain", as opposed to having its own Core Function.
    - I believe there needs to be a distinct contrast between implementing privacy controls throughout the data management life cycle (i.e. consent policies, destruction practices, etc.) and the operational activities (i.e. monitoring, logging, auditing, and communicating) that are necessary to sustain the privacy program and its controls.
    - This would align with the International Association of Privacy Professionals' *Privacy Program Management: Tools for Managing Privacy Within Your Organization* text book, as the recommendations relate to the privacy program operational lifecycle.