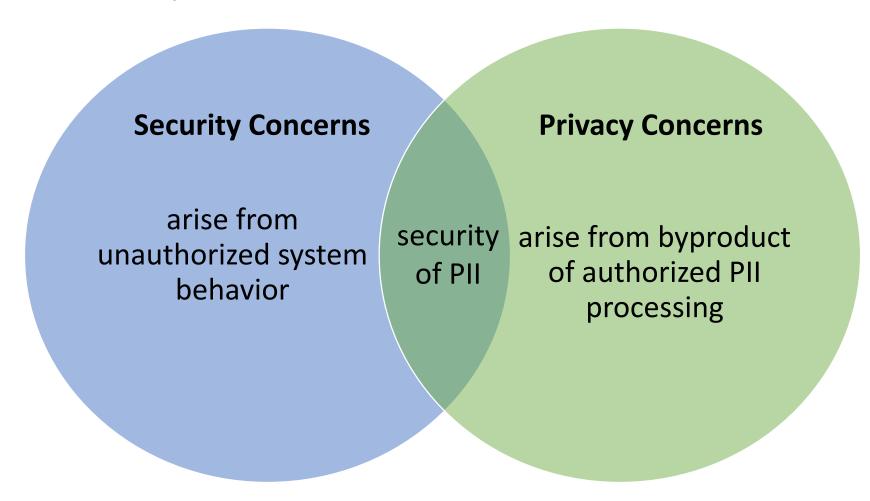
Integrating Privacy into the Risk Management Framework

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Disclaimers

The views and opinions expressed in this discussion are those of the individual presenters and should not be attributed to their employers.

Information Security and Privacy: Boundaries and Overlap



OMB Circular A-130

"While security and privacy are independent and separate disciplines, they are closely related, and it is essential for agencies to take a coordinated approach to identifying and managing security and privacy risks and complying with applicable requirements...."

Privacy Integration into Risk Management

SP-800-53 Rev 4

2014

Appendix J Introduces "Privacy Controls" for the first time – previous versions of 800-53 had limited controls for privacy.

2017

NISTIR 8062 SP 800-63-3

NIST Privacy Engineering Program releases first major interagency report on an introduction to privacy risk management introducing proposed privacy objectives on par with security's triad and a privacy risk model.

NIST releases major update to 800-63, Digital Identity Guidelines which explicitly call out privacy requirements and considerations for the first time alongside security requirements.

Coming Soon

NIST SP 800-53 Rev 5 (DRAFT)

Privacy controls will move and change from an appendix and be interspersed with security controls (integration).

*NIST also developing a voluntary Privacy Framework.

2016

OMB issues revised A-130 – the first major revision in nearly 10 years. Privacy Continuous Monitoring introduced as a concept and agencies are required to implement privacy into the Risk Management Framework.

OMB A-130

2018

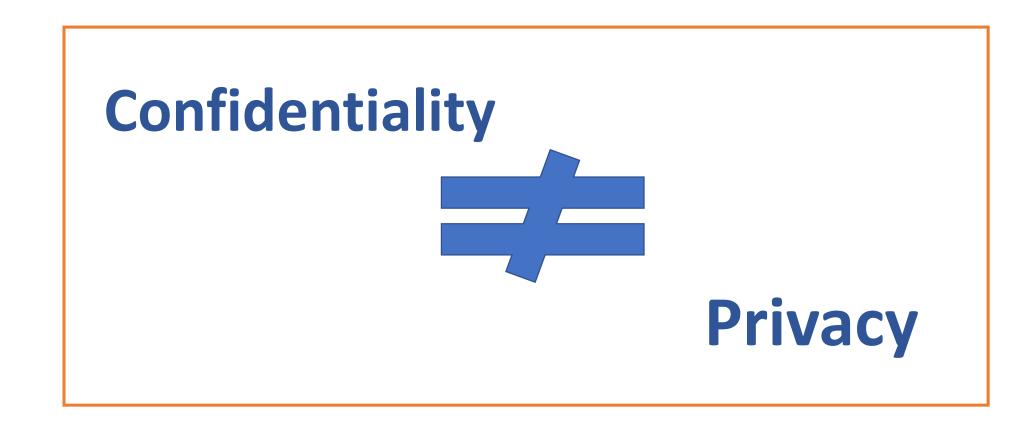
NIST issues an updated Risk Management Framework that explicitly includes privacy as part of the risk management framework for the first time.

SP 800-37 rev2 DRAFT

Common Challenges to Implementing Privacy Into the Risk Management Framework

- Security and privacy conflation
- Privacy program structure and resources
- Stakeholder communication
- Privacy control assessments
- Privacy continuous monitoring

Overcoming Challenges: Security and Privacy Conflation



Overcoming Challenges: Structure, Resources, and Communication



https://www.buzzfeed.com/mariahoxley/signs-youre-not-actually-brokeyoure-just-rich-poor

- Privacy responsibilities are often distributed across multiple organizations.
- Privacy programs tend to have limited resources.

Lessons Learned

- Communicate across boundaries.
- Work together with privacy and security teams and even other agencies to leverage existing resources or to combine efforts to create new ones.
- Integrate privacy and security policies to create buy-in.
- Build relationships now to prepare your organization for NIST SP 800-53 Rev 5.

Overcoming Challenges: Privacy Control Assessment Criteria



- NIST has not issued assessment guidance for the privacy controls.
- Concurrent SAOP and AO approval requires new procedures.
- Assessors are unlikely to be privacy SMEs.
- Many controls aren't technical.

Lessons Learned

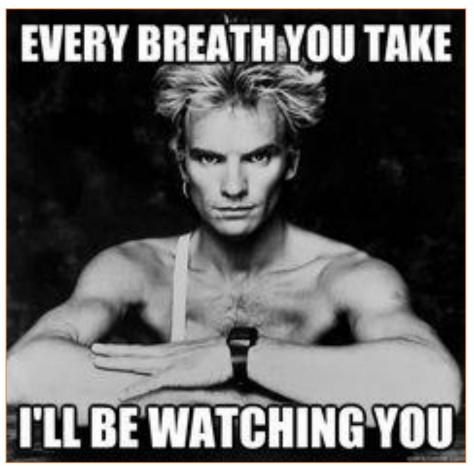
- Crosswalk the privacy controls and any existing privacy compliance documentation.
- Develop resources that help both assessors and privacy officers.

Overcoming Challenges: Privacy Continuous Monitoring

- Privacy is required to assess at a frequency sufficient to ensure compliance and manage risk.
- Most controls do not lend themselves to automated monitoring.
- Frequency may also be driven by factors like regular audits or reports.

Lessons Learned

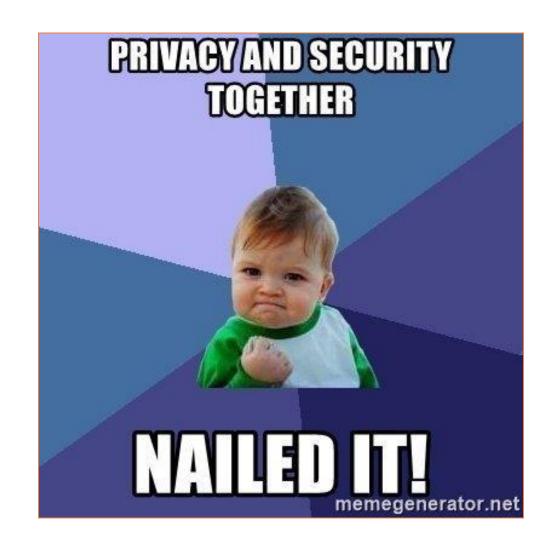
- Align your PCM with your organization's ISCM. Work with security to identify what you can automate.
- If your controls and PIAs are aligned, you have a built in minimum cadence.



Source: Photograph of Sting. https://goo.gl/images/p2K1TK

Takeaways

- Privacy and security need to learn from each other and become allies.
- Integrate and leverage as much as possible – this will help save resources and prepare your organization for NIST SP 800-53 Rev 5.
- Understand that it's a work in progress.



Questions?

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