

## Comparison of the Privacy Framework Discussion Draft and the Cybersecurity Framework Cores

NIST received support from stakeholders to align the structure of the Privacy Framework with the Cybersecurity Framework (CSF).<sup>1</sup> At the same time, stakeholders also wanted the flexibility to be able to use the Privacy Framework as a standalone document. NIST developed this document to facilitate discussion of the overlap and differences between the two frameworks at its workshop, *Drafting the NIST Privacy Framework: Workshop #2*.<sup>2</sup> As set forth in the Privacy Framework discussion draft, privacy risks overlap with data security risks; therefore, many of the CSF core components remain applicable to the Privacy Framework.<sup>3</sup>

Privacy risks also arise as a byproduct of authorized data processing, as such, some of the Privacy Framework Core components are unique while others can be mapped to CSF core components with some variations to account for privacy risks arising from authorized data processing. Tables 1 and 2 provide a comparison of the frameworks at the function, category, and subcategory level.

*Table 1: Core Function and Category Comparison*  
 Note: \* indicates that the Privacy Framework Category and the CSF Category are identical

| <b>Privacy Framework<br/>FUNCTION   Category</b>                  | <b>Cybersecurity Framework<br/>FUNCTION   Category</b>         |
|---|--|
| <b>IDENTIFY</b>   |  |
| Inventory and Mapping (ID.IM-P)                                   | Inventory and Asset Management (ID.AM)                         |
| Business Environment (ID.BE-P)                                    | Business Environment (ID.BE)                                   |
| Governance (ID.GV-P)  | Governance (ID.GV)   |
| Risk Assessment (ID.RA-P)   | Risk Assessment (ID.RA)  |
| Risk Management Strategy (ID.RM-P)*                               | Risk Management Strategy (ID.RM)*                              |
| Supply Chain Risk Management (ID.SC-P)                            | Supply Chain Risk Management (ID.SC)                           |
| <b>PROTECT</b>  |  |
| Identity Management, Authentication, and Access Control (PR.AC-P) | Identity Management, Authentication and Access Control (PR.AC) |
| Awareness and Training (PR.AT-P)                                  | Awareness and Training (PR.AT)                                 |
| Data Security (PR.DS-P)   | Data Security (PR.DS)  |
| Data Protection Processes and Procedures (PR.DP-P)                | Information Protection Processes and Procedures (PR.IP)        |
| Maintenance (PR.MA-P)   | Maintenance (PR.MA)  |
| Protective Technology (PR.PT-P)                                   | Protective Technology (PR.PT)                                  |
| Protected Processing (PR.PP-P)                                    | Protective Technology (PR.PT)                                  |
| <b>CONTROL</b>  |  |
| Data Management Processes and Procedures (CT.PO-P)                | <i>None</i>  |
| Data Management (CT.DM-P)   |  |

<sup>1</sup> See *Framework for Improving Critical Infrastructure Cybersecurity*, <https://doi.org/10.6028/NIST.CSWP.04162018>

<sup>2</sup> See <https://www.nist.gov/news-events/events/2019/05/drafting-nist-privacy-framework-workshop-2>

<sup>3</sup> See Figure 2, *NIST Privacy Framework: An Enterprise Risk Management Tool (Discussion Draft)*, <https://www.nist.gov/document/nist-privacy-framework-discussion-draftpdf>

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| Privacy Framework<br>FUNCTION   Category        | Cybersecurity Framework<br>FUNCTION   Category |
|---|--|
| <b>INFORM</b>                                   | <i>None</i>                                    |
| Transparency Processes and Procedures (IN.TP-P) |  |
| Data Processing Awareness (IN.AW-P)             |  |
| <i>None</i>                                     | <b>DETECT</b>                                  |
|   | Anomalies and Events (DE.AE)                   |
|   | Security Continuous Monitoring (DE.CM)         |
|   | Detection Processes (DE.DP)                    |
| <b>RESPOND</b>                                  |  |
| Response Planning (RS.RP-P)                     | Response Planning (RS.RP)                      |
| Communications (RS.CO-P)*                       | Communications (RS.CO)*                        |
| Analysis (RS.AN-P)                              | Analysis (RS.AN)                               |
| Mitigation (RS.MI-P)                            | Mitigation (RS.MI)                             |
| Improvements (RS.IM-P)                          | Improvements (RS.IM)                           |
| Redress (RS.RE-P)                               | <i>None</i>                                    |
| <i>None</i>                                     | <b>RECOVER</b>                                 |
|   | Recovery Planning (RC.RP)                      |
|   | Improvements (RC.IM)                           |
|   | Communications (RC.CO)                         |

Table 2: Core Subcategory Comparison

Note: \* indicates that the Privacy Framework Subcategory and the CSF Subcategory are identical

| Function | Privacy Framework |             | Cybersecurity Framework   |
|----------|-------------------|-------------|---------------------------|
|          | Category          | Subcategory | Subcategory               |
| Identify | IM                | ID.IM-P1    | ID.AM-1, ID.AM-2          |
|          |                   | ID.IM-P2    | ID.AM-1, ID.AM-4          |
|          |                   | ID.M-P3     | ID.AM-1, ID.AM-2, ID.AM-4 |
|          |                   | ID.IM-P4    | <i>None</i>               |
|          |                   | ID.IM-P5    | ID.AM-1, ID.AM-2, ID.AM-4 |
|          |                   | ID.IM-P6    | ID.AM-3, DE.AE-1          |
|          | BE                | ID.BE-P1*   | ID.BE-1*                  |
|          |                   | ID.BE-P2*   | ID.BE-3*                  |
|          |                   | ID.BE-P3    | ID.BE-4                   |
|          | GV                | ID.GV-P1    | ID.GV-1                   |
|          |                   | ID.GV-P2    | <i>None</i>               |
|          |                   | ID.GV-P3    | ID.GV-2                   |
|          |                   | ID.GV-P4    | ID.GV-2                   |
|          |                   | ID.GV-P5    | ID.GV-3                   |
|          |                   | ID.GV-P6    | ID.GV-4                   |
|          | RA                | ID.RA-P1    | <i>None</i>               |
|          |                   | ID.RA-P2    | <i>None</i>               |
|          |                   | ID.RA-P3    | ID.RA-3                   |
|          |                   | ID.RA-P4    | ID.RA-4, ID.RA-5          |

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| Function  | Privacy Framework |             | Cybersecurity Framework |
|-----------|-------------------|-------------|-------------------------|
|           | Category          | Subcategory | Subcategory             |
|           |                   | ID.RA-P5*   | ID.RA-6*                |
|           |                   | ID.RA-P6    | None                    |
|           | RM                | ID.RM-P1*   | ID.RM-1*                |
|           |                   | ID.RM-P2*   | ID.RM-2*                |
|           |                   | ID.RM-P3    | ID.RM-3                 |
|           | SC                | ID.SC-P1    | ID.SC-1                 |
|           |                   | ID.SC-P2    | ID.SC-2                 |
|           |                   | ID.SC-P3    | ID.SC-3                 |
|           |                   | ID.SC-P4    | ID.SC-4                 |
|           |                   | ID.SC-P5    | ID.SC-5                 |
|           | Protect           | AC          | PR.AC-P1                |
| PR.AC-P2  |                   |             | PR.AC-2                 |
| PR.AC-P3* |                   |             | PR.AC-3*                |
| PR.AC-P4* |                   |             | PR.AC-4*                |
| PR.AC-P5* |                   |             | PR.AC-5*                |
| PR.AC-P6  |                   |             | PR.AC-6, PR.AC-7        |
| PR.AC-P7  |                   |             | PR.AC-6                 |
| AT        |                   | PR.AT-P1*   | PR.AT-1*                |
|           |                   | PR.AT-P2*   | PR.AT-2*                |
|           |                   | PR.AT-P3    | PR.AT-3                 |
|           |                   | PR.AT-P4*   | PR.AT-4*                |
|           |                   | PR.AT-P5    | PR.AT-5                 |
| DS        |                   | PR.DS-P1*   | PR.DS-1*                |
|           |                   | PR.DS-P2*   | PR.DS-2*                |
|           |                   | PR.DS-P3    | PR.DS-3                 |
|           |                   | PR.DS-P4*   | PR.DS-4*                |
|           |                   | PR.DS-P5*   | PR.DS-5*                |
|           |                   | PR.DS-P6*   | PR.DS-6*                |
|           |                   | PR.DS-P7*   | PR.DS-7*                |
|           |                   | PR.DS-P8*   | PR.DS-8*                |
| DP        |                   | PR.DP-P1    | PR.IP-1                 |
|           |                   | PR.DP-P2    | PR.IP-2                 |
|           |                   | PR.DP-P3*   | PR.IP-3*                |
|           |                   | PR.DP-P4*   | PR.IP-4*                |
|           |                   | PR.DP-P5*   | PR.IP-5*                |
|           |                   | PR.DP-P6*   | PR.IP-6*                |
|           |                   | PR.DP-P7*   | PR.IP-7*                |
|           |                   | PR.DP-P8*   | PR.IP-8*                |
|           |                   | PR.DP-P9*   | PR.IP-9*                |
|           |                   | PR.DP-P10*  | PR.IP-10*               |
|           | PR.DP-P11         | PR.IP-11    |                         |
|           | PR.DP-P12*        | PR.IP-12*   |                         |
| MA        | PR.MA-P1*         | PR.MA-1*    |                         |
|           | PR.MA-P2*         | PR.MA-2*    |                         |

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| Function | Privacy Framework |             | Cybersecurity Framework |      |
|----------|-------------------|-------------|-------------------------|------|
|          | Category          | Subcategory | Subcategory             |      |
|          | PT                | PR.PT-P1    | PR.PT-1                 |      |
|          |                   | PR.PT-P2*   | PR.PT-2*                |      |
|          |                   | PR.PT-P3*   | PR.PT-3*                |      |
|          |                   | PR.PT-P4*   | PR.PT-4*                |      |
|          |                   | PR.PT-P5*   | PR.PT-5*                |      |
|          | PP                | PR.PP-P1    | None                    |      |
|          |                   | PR.PP-P2    | None                    |      |
|          |                   | PR.PP-P3    | None                    |      |
|          |                   | PR.PP-P4    | None                    |      |
|          |                   | PR.PP-P5    | None                    |      |
| Control  | PO                | CT.PO-P1    | None                    |      |
|          |                   | CT.PO-P2    | None                    |      |
|          |                   | CT.PO-P3    | None                    |      |
|          | DM                | CT.DM-P1    | None                    |      |
|          |                   | CT.DM-P2    | None                    |      |
|          |                   | CT.DM-P3    | None                    |      |
|          |                   | CT.DM-P4    | None                    |      |
|          |                   | CT.DM-P5    | None                    |      |
|          |                   | CT.DM-P6    | None                    |      |
|          |                   | CT.DM-P7    | None                    |      |
|          |                   | CT.DM-P8    | None                    |      |
|          | Inform            | TP          | IN.TP-P1                | None |
|          |                   |             | IN.TP-P2                | None |
| AW       |                   | IN.AW-P1    | None                    |      |
|          |                   | IN.AW-P2    | None                    |      |
|          |                   | IN.AW-P3    | None                    |      |
|          |                   | IN.AW-P4    | None                    |      |
|          |                   | IN.AW-P5    | None                    |      |
|          |                   | IN.AW-P6    | None                    |      |
| IN.AW-P7 | None              |             |                         |      |
| Respond  | RP                | RS.RP-P1    | RS.RP-1                 |      |
|          | CO                | RS.CO-P1*   | RS.CO-1*                |      |
|          |                   | RS.CO-P2    | RS.CO-2                 |      |
|          |                   | RS.CO-P3*   | RS.CO-3*                |      |
|          |                   | RS.CO-P4*   | RS.CO-4*                |      |
|          |                   | RS.CO-P5    | RS.CO-5                 |      |
|          |                   | RS.CO-P6    | None                    |      |
|          | AN                | RS.AN-P1    | RS.AN-1                 |      |
|          |                   | RS.AN-P2    | RS.AN-2                 |      |
|          |                   | RS.AN-P3*   | RS.AN-3*                |      |
|          |                   | RS.AN-P4    | RS.AN-4                 |      |
|          |                   | RS.AN-P5    | RS.AN-5                 |      |
|          | MI                | RS.MI-P1    | RS.MI-1                 |      |
| RS.MI-P2 |                   | RS.MI-2     |                         |      |

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| Function | Privacy Framework |             | Cybersecurity Framework |
|----------|-------------------|-------------|-------------------------|
|          | Category          | Subcategory | Subcategory             |
|          |                   | RS.MI-P3    | RS.MI-3                 |
|          | IM                | RS.IM-P1    | RS.IM-1, RS.IM-2        |
|          | RE                | RS.RE-P1    | None                    |
|          |                   | RS.RE-P2    | None                    |