

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).¹ 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*.² 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.³

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

Privacy Framework FUNCTION Category	Cybersecurity Framework FUNCTION Category
IDENTIFY	
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)
PROTECT	
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)
CONTROL	
Data Management Processes and Procedures (CT.PO-P)	<i>None</i>
Data Management (CT.DM-P)	

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

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

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

Privacy Framework Discussion Draft Core Comparison

Privacy Framework FUNCTION Category	Cybersecurity Framework FUNCTION Category
INFORM	<i>None</i>
Transparency Processes and Procedures (IN.TP-P)	
Data Processing Awareness (IN.AW-P)	
<i>None</i>	DETECT
	Anomalies and Events (DE.AE)
	Security Continuous Monitoring (DE.CM)
	Detection Processes (DE.DP)
RESPOND	
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>	RECOVER
	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-1
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