Integrating Privacy into the Risk Management Framework

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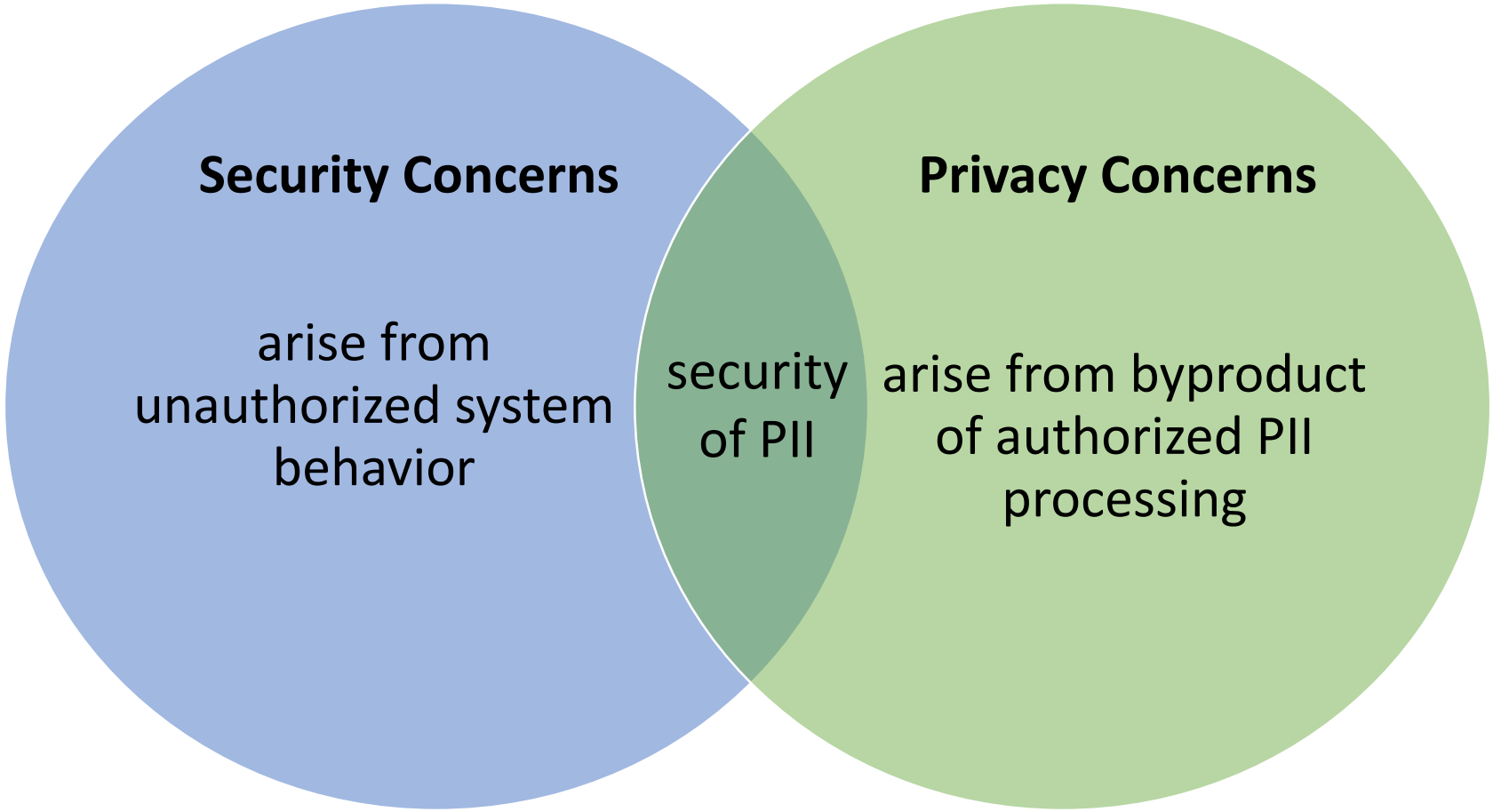
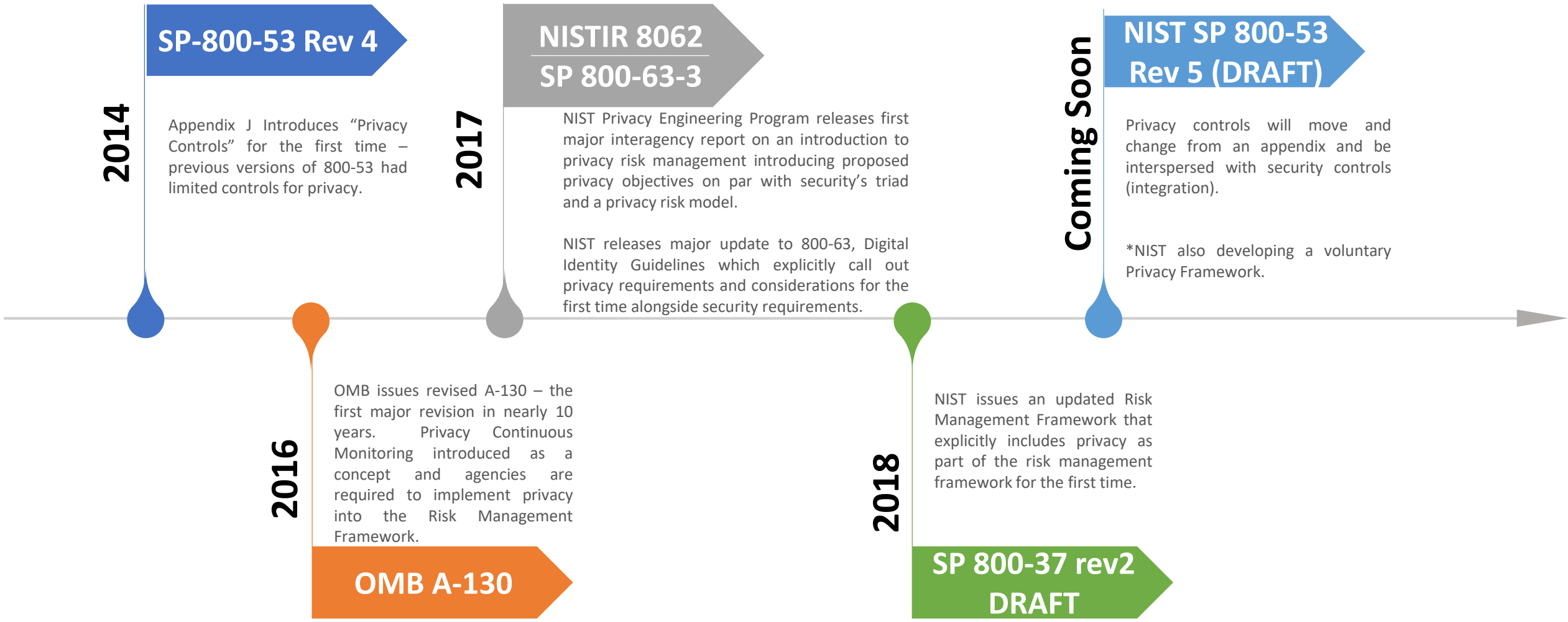
Information Security and Privacy: Boundaries and Overlap



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

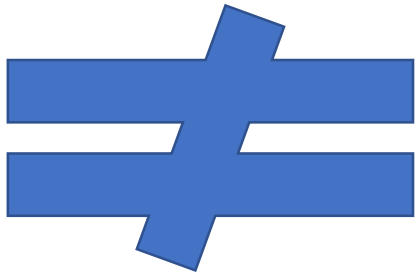


Common Challenges to Implementing Privacy Into the Risk Management Framework

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

Overcoming Challenges: Security and Privacy Conflation

Confidentiality



Privacy

Overcoming Challenges: Structure, Resources, and Communication

Source: Still of Kristen Wiig in Bridesmaids. https://www.buzzfeed.com/mariahoxley/signs-youre-not-actually-broke-youre-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

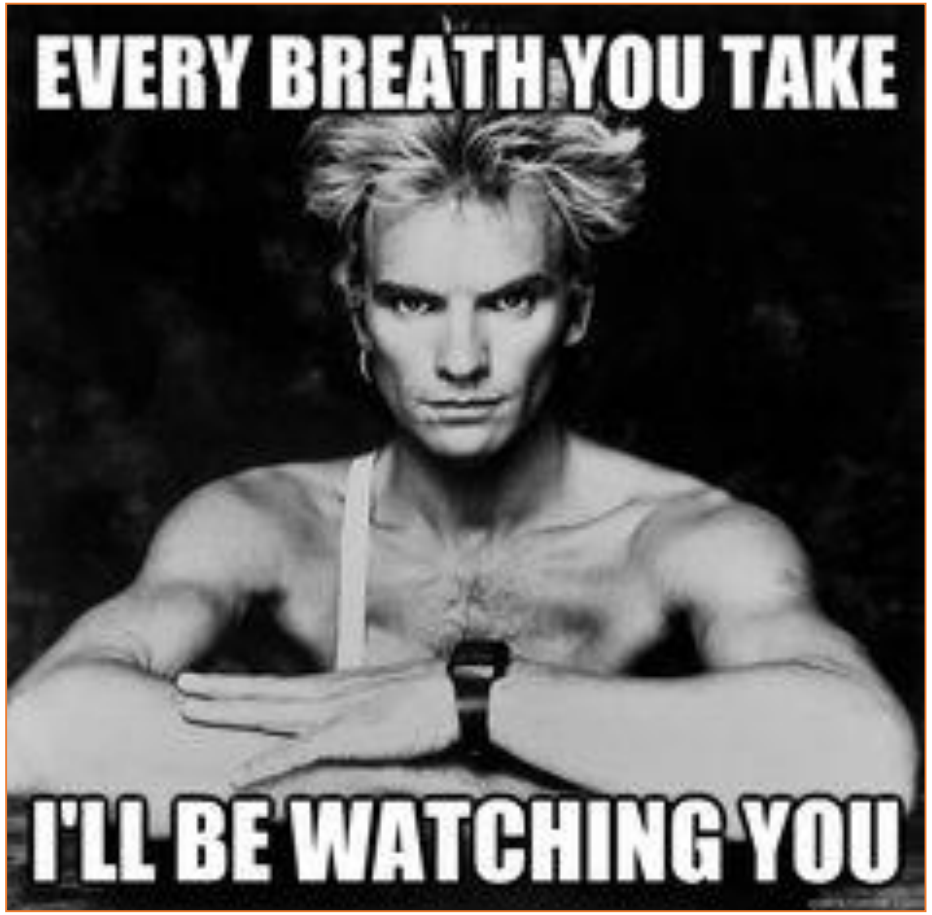
- Crosswalk the privacy controls and any existing privacy compliance documentation.
- Develop resources that help both assessors and privacy officers.

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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