

From: Sara R <ysara1@yahoo.com>

Sent: Saturday, November 2, 2019 2:18 PM

To: Truong, Pauline (Fed) <pauline.truong@nist.gov>; privacyframework <privacyframework@nist.gov>

Subject: Re: Details for Getting to V1.0 of the NIST Privacy Framework: Workshop #3 - July 8-9, 2019

Hi Katie,

I have made a couple of comments on the draft as per the attached

Perhaps these items were already discussed and disposed of by the group but just wanted to send them to you in case they are useful for consideration while the draft is still being reviewed.

Thanks and regards,
Sara Ricci
914-374-8593

| Comment # | Organization Name | Submitted By (Name/Email) | Page # | Line # | Section | Comment (Include rationale for comment) | Suggested Change | Type of Comment (General/Editorial/Technical) |
|-----------|-------------------|--|--------|-----------------------|------------|---|--|---|
| 1 | | ysara1@yahoo.com | 22 | ID.RA-P5 | Identify | "ID.RA-P5: Risk responses are identified, prioritized, and implemented." This should be part of Control and not Risk Assessment as a control is a means to mitigate the Risk ; or part of a Respond section which does not exist in the Core. Since the Controls section is all about controls on data management and processing, can we just change Risk Assessment to Risk Assessment and Response? | Re-label Risk Assessment as "Risk Assessment and Response" | |
| 2 | | ysara1@yahoo.com | 23 | GV.PP-P3 and GV.PP-P6 | Governance | What about explicit comment on Governance rather than a generic comment on understanding of roles and responsibilities? Integration of Privacy Risk within an enterprise level Governance structure for strategic management of privacy risk by enabling flow of all emerging privacy risks, risk response up to Executive management, including an Organizational Structure that makes Privacy a visible role? | | |