Success with the NIST Privacy Framework:

Arlington County, Virginia

BENEFITS

✓ Strengthened public trust in County accountability and transparency in managing privacy risks

✓ Implementation of risk-informed privacy practices, tools and training

✓ Alignment of cybersecurity, privacy and records data management

✓ Operationalization of privacy principles

> "The NIST Privacy Framework empowers Arlington County to assess, prioritize and improve our privacy practices at the enterprise level down to the project level. We can manage risk while innovating with data-driven technology and effectively communicate our risk/reward balance."
>
> Jaime Lees, Chief Data Officer

Challenges

- Regulations not keeping pace with rapid introduction of new types of personal information
- Limited formal resources for County government agencies managing unregulated personal information
- Low levels of privacy literacy and few privacy professionals across the workforce

Drivers

- Increased cybersecurity threats, e.g., ransomware, impacting personal information held by government agencies
- Growing interest in and adoption of "smart city" technologies
- Elevated community awareness and interest in having control over their personal information

Process

- Formation of cross-agency Data Privacy Steering Group to provide insight on development of privacy principles, policy, impact assessment and training
- Pilot privacy program practices within "smart city" technology pilot programs
- Formation of academic/community-based project-specific privacy panels to provide independent, volunteer feedback and oversight on privacy risk management compliance
- Development of project-specific privacy impact assessment and risk mitigation plans with mitigations associated with NIST Privacy Framework Subcategories
- Collaborative and iterative project assessments using the NIST Privacy Framework by panel members and County staff
- Internal and panel project monitoring for new impact assessment and risk mitigation plan compliance
- End-of-project internal and panel privacy lessons learned and recommendations at project and enterprise levels

Results and Impacts

- Workforce and community increased privacy literacy
- Improved community engagement through reliance on national privacy standard framework
- Ability to consistently balance privacy risk and anticipated benefits in making decisions and setting policy

What's Next

- Pilot program lessons learned to support practical privacy program implementation use cases
- Release of privacy policy draft for public engagement
- Agency and enterprise privacy risk assessments/ scorecards using NIST Privacy Framework
- Development of enterprise personal information asset and risk inventory in line with NIST Privacy Framework Subcategories

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