NIST Privacy Workforce
Public Working Group

Meeting #28
Wednesday, October 11, 2023
INTRODUCTION
PWWG Co-Chairs

Dylan Gilbert
Privacy Policy Advisor
National Institute of Standards and Technology

Doug Forman
Certification Director
International Association of Privacy Professionals

Mary N. Chaney, Esq., CISSP, CIPP/US
Managing Attorney
The Law Offices of Mary N. Chaney, PLLC

Melanie Ensign
Founder & CEO
Discernable, Inc
PWWG UPDATES
PWWG Updates
TKS Compilation Documents

TKS Compilation Inventory

TKS Compilation Mapping
PWWG Updates
Timeline

Revised Target Timeline

May – October, 2023 [17 Subcategories]

PT6 Risk Management Strategy (GV.RM-P) - 3 Subcategories
PT7 Awareness and Training (GV.AT-P) - 4 Subcategories
PT8 Data Processing Management (CT.DM-P) - 10 Subcategories

November – March, 2023-24 [20 Subcategories]

PT9 Data Processing Awareness (CM.AW-P) - 8 Subcategories
PT10 Monitoring and Review (GV.MT-P) - 7 Subcategories
PT11 Disassociated Processing (CT.DP-P) - 5 Subcategories
PWWG Updates
Timeline

Revised Target Timeline

Spring, 2024

• Release Privacy Workforce Taxonomy Public Draft
• Public comment period for Public Draft

Summer, 2024

• Publish Privacy Workforce Taxonomy, Version 1.0
PWWG Updates
Orientation Video

• On demand for all PWWG members

• Finalizing details and then will be posted on webpage

• Anticipated release by November 1
PWWG Updates
TKS Standardization: Next Steps

• Include ID.RA-P2 TKS Statements
• Standardize material from PT6 – PT8
• Explore consolidation of additional statements from PT1 – PT5
PWWG Updates
Knowledge and Skills Baseline

• Foundational Knowledge and Skill Statements that are applicable across the Privacy Framework Core
• Will be included somewhere in the taxonomy, likely front matter and/or an appendix
• Examples:
  • Knowledge of privacy laws, regulations, standards, and best practices and skill in applying them
  • Collaboration and communication skills
PWWG Updates
Co-Chairs Next Steps

• TKS Statement review for PT6 – PT8

• Select Co-Leads for PT9 – PT11
Interested? Send name, preferred email address, and link to your LinkedIn or other bio/CV to: pwwg@nist.gov

- Project Team 9: Data Processing Awareness (CM.AW-P)
- Project Team 10: Monitoring and Review (GV.MT-P)
- Project Team 11: Disassociated Processing (CT.DP-P)
PROJECT TEAM UPDATES
Project Team 6: Risk Management Strategy (GV.RM-P)

Co-Leads

Dana Garbo
Chief Privacy Officer, Medline Industries

James Koons
Founding Partner, Data Privacy & Security Advisors
Project Team 6: 
Work Assignment

Function: GOVERN-P (GV-P)
Develop and implement the organizational governance structure to enable an ongoing understanding of the organization’s risk management priorities that are informed by privacy risk.

Category: Risk Management Strategy (GV.RM-P): The organization’s priorities, constraints, risk tolerances, and assumptions are established and used to support operational risk decisions.

<table>
<thead>
<tr>
<th>Subcategory</th>
<th>Description</th>
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<tbody>
<tr>
<td>GV.RM-P1</td>
<td>Risk management processes are established, managed, and agreed to by organizational stakeholders.</td>
</tr>
<tr>
<td>GV.RM-P2</td>
<td>Organizational risk tolerance is determined and clearly expressed.</td>
</tr>
<tr>
<td>GV.RM-P3</td>
<td>The organization’s determination of risk tolerance is informed by its role(s) in the data processing ecosystem.</td>
</tr>
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Project Team 6: Risk Management Strategy (GV.RM-P)
Progress Update

• **Current Status**
  • Completed pre-drafting TKS statements for GV.RM-P2-P3 (Co-Leads)
  • Completed review of TKS Statements for GV.RM-P2 and sent to Co-Chairs for review.

• **Goals for this work period:**
  • Continue review of TKS Statements for GV.RM-P3
  • Review Co-Chair feedback for GV.RM-P2 (Co-Leads)

The Co-Leads encourage all members to continue to leave comments on the TKS Statements in the TKS Workbook between meetings.
Next Meeting:
Thursday, October 19, 2023
1:00 PM – 2:00 PM EDT
Project Team 7: Awareness and Training (GV.AT-P)
Co-Leads

Jacqueline Crawley
VP of Governance, ISACA Atlanta

Ivy Orecchio
Cybersecurity and Privacy Services Manager, Venable LLP

Dr. Elif Kiesow Cortez
Research Fellow, Stanford Law School
Project Team 7: Awareness and Training (GV.AT-P)

Work Assignment

Function: GOVERN-P (GV-P)
Develop and implement the organizational governance structure to enable an ongoing understanding of the organization’s risk management priorities that are informed by privacy risk.

Privacy Framework Category – Awareness and Training (GV.AT-P): The organization’s workforce and third parties engaged in data processing are provided privacy awareness education and are trained to perform their privacy-related duties and responsibilities consistent with related policies, processes, procedures, and agreements and organizational privacy values.

<table>
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<tbody>
<tr>
<td>GV.AT-P1</td>
<td>The workforce is informed and trained on its roles and responsibilities.</td>
</tr>
<tr>
<td>GV.AT-P2</td>
<td>Senior executives understand their roles and responsibilities.</td>
</tr>
<tr>
<td>GV.AT-P3</td>
<td>Privacy personnel understand their roles and responsibilities.</td>
</tr>
<tr>
<td>GV.AT-P4</td>
<td>Third parties (e.g., service providers, customers, partners) understand their roles and responsibilities.</td>
</tr>
</tbody>
</table>
Project Team 7: Awareness and Training (GV.AT-P)
Progress Update

• **Current Status**
  • Completed pre-drafting TKS statements for GV.AT-P2 through GV.AT-P4 (Co-Leads).
  • Completed review of TKS Statements for GV.AT-P2, P3, & P4

• **Goals for this work period:**
  • Complete review of Co-Chair feedback for GV.AT-P2, P3, & P4

The Co-Leads encourage all members to continue to leave comments on the TKS Statements in the TKS Workbook between meetings.
Next Meeting: **If needed**
Wednesday, October 18, 2023
1:00 PM – 2:00 PM EDT

PT7 (GV.AT-P): PrivacyWorkforcePT7+subscribe@list.nist.gov
Project Team 8: Data Processing Management (CT.DM-P)

Abhinav (Abby) Palia, Sr. Research Scientist, AWS

Ridwan Badmus, Legal Associate & CTO, Oguntoye & Oguntoye LP

Nikita Samarin, Digital Safety and Privacy Researcher, UC Berkeley
Project Team 8: Work Assignment

Privacy Framework Function: CONTROL-P (CT-P): Develop and implement appropriate activities to enable organizations or individuals to manage data with sufficient granularity to manage privacy risks.

Privacy Framework Category – Data Processing Management (CT.DM-P): Data are managed consistent with the organization’s risk strategy to protect individuals’ privacy, increase manageability, and enable the implementation of privacy principles (e.g., individual participation, data quality, data minimization).

<table>
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<tbody>
<tr>
<td>CT.DM-P1</td>
<td>Data elements can be accessed for review.</td>
</tr>
<tr>
<td>CT.DM-P2</td>
<td>Data elements can be accessed for transmission or disclosure.</td>
</tr>
<tr>
<td>CT.DM-P3</td>
<td>Data elements can be accessed for alteration.</td>
</tr>
<tr>
<td>CT.DM-P4</td>
<td>Data elements can be accessed for deletion.</td>
</tr>
<tr>
<td>CT.DM-P5</td>
<td>Data are destroyed according to policy.</td>
</tr>
<tr>
<td>CT.DM-P6</td>
<td>Data are transmitted using standardized formats.</td>
</tr>
<tr>
<td>CT.DM-P7</td>
<td>Mechanisms for transmitting processing permissions and related data values with data elements are established and in place.</td>
</tr>
<tr>
<td>CT.DM-P8</td>
<td>Audit/log records are determined, documented, implemented, and reviewed in accordance with policy and incorporating the principle of data minimization.</td>
</tr>
<tr>
<td>CT.DM-P9</td>
<td>Technical measures implemented to manage data processing are tested and assessed.</td>
</tr>
<tr>
<td>CT.DM-P10</td>
<td>Stakeholder privacy preferences are included in algorithmic design objectives and outputs are evaluated against these preferences.</td>
</tr>
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Project Team 8: Data Processing Management (CT.DM-P)
Progress Update

• **Current Status**
  • PT8 plans to leverage work done for CT.DM-P1 in the subsequent Subcategories CT.DM-P2 through CT.DM-P4.
  • Completed review of TKS statements for CT.DM-P5 and sent to PWWG Co-Chairs for review.

• **Goals for this work period:**
  • PT8 will begin reviewing TKS Statements for CT.DM-P6.
  • Co-Leads will continue pre-drafting TKS statements for CT.DM-P6 through CT.DM-P10.

The Co-Leads encourage all members to continue to leave comments on the TKS Statements in the TKS Workbook between meetings.
PT8: Data Processing Management (CT.DM-P)
Meeting Schedule

Next Meeting:
Thursday, October 12, 2023
11:00 AM – 12:00 PM EDT

PT8 (CT.DM-P): PrivacyWorkforcePT8+subscribe@list.nist.gov
NEXT STEPS
Next Steps
Upcoming Meetings

Project Team 6: Risk Management Strategy (GV.RM-P)
Next Meeting: **Thursday, October 19 | 1:00 p.m. – 2:00 p.m. ET**

Project Team 7: Awareness and Training (GV.AT-P)
Next Meeting: **As needed**

Project Team 8: Data Processing Management (CT.DM-P)
Next Meeting: **Thursday, October 12, 2023 | 12:00 p.m. - 1:00 p.m. ET**

NIST Privacy Workforce Public Working Group
**Wednesday, November 8, 2023 | 1:00pm – 2:00pm ET**

* For updated meeting schedules see the [Privacy Workforce Public Working Group | NIST](https://nist.gov) web page.
Next Steps
Mailing List Sign-up

• Privacy Workforce Working Group (PWWG): PrivacyWorkforceWG+subscribe@list.nist.gov
• PT6 (GV.RM-P): PrivacyWorkforcePT6+subscribe@list.nist.gov
• PT7 (GV.AT-P): PrivacyWorkforcePT7+subscribe@list.nist.gov
• PT8 (CT.DM-P): PrivacyWorkforcePT8+subscribe@list.nist.gov

• All mailing lists are moderated
Next Steps
Troubleshooting

• Email questions to pwwg@nist.gov