



NIST Privacy Workforce Public Working Group

Meeting #10

Wednesday, February 9, 2022

INTRODUCTION



PWWG UPDATES

Project Team 2: Inventory and Mapping

Nearing the finish line!



Project Team 2: Inventory and Mapping

Nearing the finish line!

Great! So, now what?



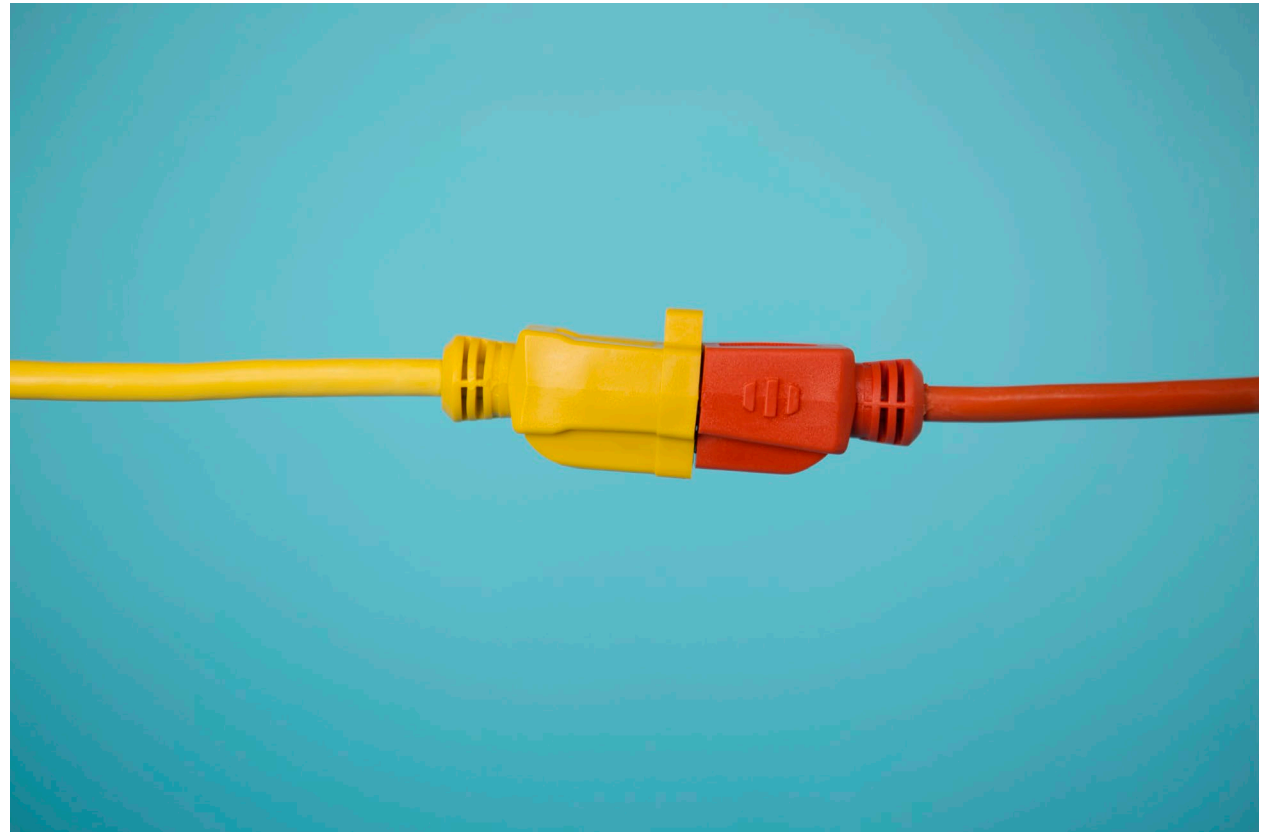
Project Team 2 Unwind: Next Steps

- PT2 finishes work
- NIST spins up PT4
- NIST builds out Privacy Framework/PWWG mapping



Privacy Framework >< PWWG TKS Mapping

- Map completed TKS Statements to Privacy Framework Core Categories and Subcategories
- Read-only accessible to PWWG members via shared Google Drive



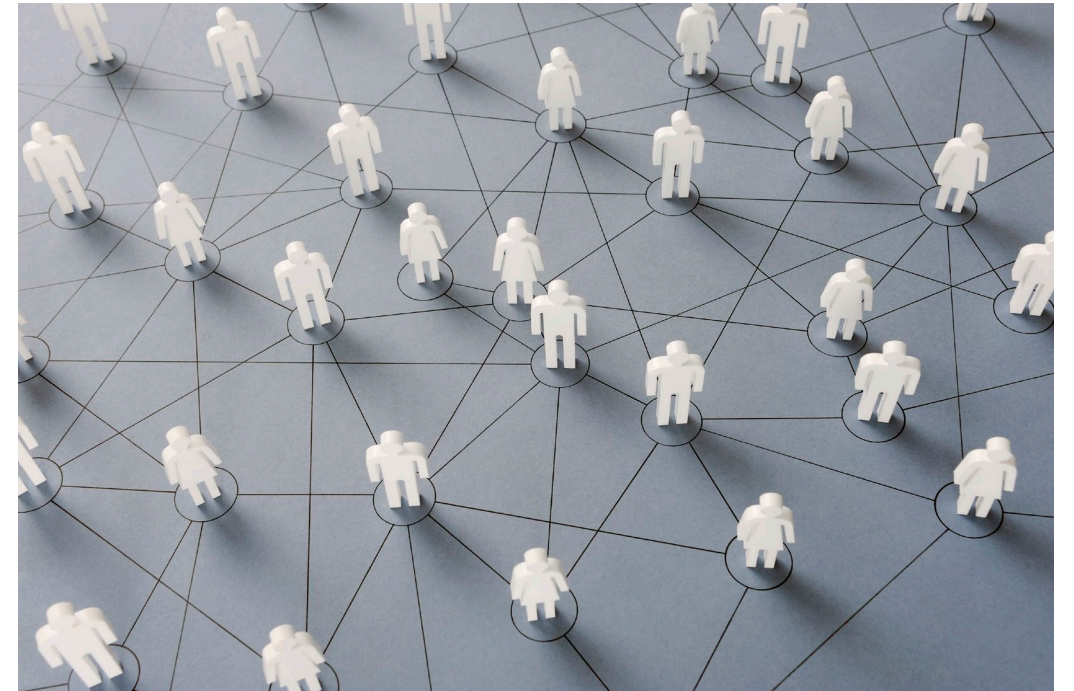
Project Team 3: Policies, Processes, and Procedures

Off to the races!



Project Team 4: Data Processing Ecosystem Risk Management

- Call for Co-Lead volunteers, window closes Wednesday February 9, 5pm Eastern Time
- Co-Chairs Select Team Leads, February 10
- First PT4 Meeting, week of March 7 (subject to change)



Co-Chairs TKS Statement Review Update

- Reviewing PT1 TKS Statements for ID.RA-P1, P2, and P3
- Next Co-Chairs TKS Review: February 24, 2022

PROJECT TEAM UPDATES

PROJECT TEAM 1:

Risk Assessment (ID.RA-P)

Project Team 1: Risk Assessment (ID.RA-P)

Team Co-Leads



Lauren Jones
Privacy Counsel, Surescripts, LLC



Dr. Lisa McKee
Senior Manager Security and Data Privacy, Protiviti

Project Team 1: Risk Assessment (ID.RA-P)

Task, Knowledge, Skill Statements (TKS)

Project Team 1:

- **Task, Knowledge, and Skill (TKS) Statements**
 - **Subcategories**

Subcategory	Description
ID.RA-P1	Contextual factors related to the systems/products/services and the data actions are identified (e.g., individuals' demographics and privacy interests or perceptions, data sensitivity and/or types, visibility of data processing to individuals and third parties).
ID.RA-P2	Data analytic inputs and outputs are identified and evaluated for bias.
ID.RA-P3	Potential problematic data actions and associated problems are identified.
ID.RA-P4	Problematic data actions, likelihoods, and impacts are used to determine and prioritize risk.
ID.RA-P5	Risk responses are identified, prioritized, and implemented.

Project Team 1: Risk Assessment (ID.RA-P)

Progress Update

- Project Team's goals for the January work period
- Accomplishments
- Challenges/lessons learned

Project Team 1: Risk Assessment (ID.RA-P)

Recurring Meetings

- Every 1st Thursday of the month | 11:00AM - 12:00 PM ET
- Every 3rd Wednesday of the month | 5:00PM – 6:00PM ET

Next meeting:

Wednesday, February 16, 2022, | 5:00PM – 6:00PM ET

Project Team 1: Risk Assessment (ID.RA-P)

Mailing List Sign-Up



PrivacyWorkforcePT1+subscribe@list.nist.gov

PROJECT TEAM UPDATES

PROJECT TEAM 2:

Inventory and Mapping (ID.IM-P)

Project Team 2: Inventory and Mapping (ID.IM-P)

Team Co-Leads



Dr. Sarah Lewis Cortes
Privacy Engineering, Netflix



Mary Potter
Director of Privacy and Research Data
Protections, Virginia Tech

Project Team 2: Inventory and Mapping (ID.IM-P)

Task, Knowledge, Skill Statements (TKS)

- **Project Team 2:**
 - **Task, Knowledge, and Skill (TKS) Statements**

Subcategory	Description
ID.IM-P1:	Systems/products/services that process data are inventoried.
ID.IM-P2:	Owners or operators (e.g., the organization or third parties such as service providers, partners, customers, and developers) and their roles with respect to the systems/products/services and components (e.g., internal or external) that process data are inventoried.
ID.IM-P3:	Categories of individuals (e.g., customers, employees or prospective employees, consumers) whose data are being processed are inventoried.
ID.IM-P4:	Data actions of the systems/products/services are inventoried.
ID.IM-P5:	The purposes for the data actions are inventoried.
ID.IM-P6:	Data elements within the data actions are inventoried.
ID.IM-P7:	The data processing environment is identified (e.g., geographic location, internal, cloud, third parties).
ID.IM-P8:	Data processing is mapped, illustrating the data actions and associated data elements for systems/products/services, including components; roles of the component owners/operators; and interactions of individuals or third parties with the systems/products/services

Project Team 2: Inventory and Mapping (ID.IM-P)

Progress Update -1

Goals for February work period

- Complete the review of baseline TKS statements

January 2022 Accomplishments

- Incorporated the P7-8 updates from PWWG co-chairs
- Incorporated TKSs for 1) PF, 2) Functions and 3) Categories

Project Team 2: Inventory and Mapping (ID.IM-P)

Progress Update -2

Challenges/lessons learned

- Plan for iterative PWWG co-chair draft TKS review, rather than “one and done”
- Close attention to wording of each subcategory helps elucidate Team2 wording selection, e.g. “Identify” in some subcats vs “inventory” in others helps explain why Team 2 chose different Ts
- Baseline TKSs for 1) PF, 2) Function and 3) Category avoids repetition in subcats
- Some proposed Ts are more relevant to other Functions, Categories and subcategories- we resisted the impulse to incorporate Ts outside our scope, and made a “holding place” for Ts that fit better elsewhere

Project Team 2: Inventory and Mapping (ID.IM-P)

Recurring Meetings

Biweekly on Mondays from 12:00 PM ET to 1:00 PM ET

Last meeting:

Monday, February 28th, 2022

Project Team 2: Inventory and Mapping (ID.IM-P)

Mailing List Sign-Up



PrivacyWorkforcePT2+subscribe@list.nist.gov

PROJECT TEAM UPDATES

PROJECT TEAM 3:

Policies, Processes, and Procedures

PROJECT TEAM 3: Policies, Processes, and Procedures

Team Co-Leads



Amin Ali

GRC Program Manager &
Cybersecurity PMO Lead
Motorola Solutions



Dan LoPresto

Director, Privacy Compliance
University of Central Florida
(UCF)



Nandita Rao Narla

Senior Privacy Program Manager
DoorDash

PROJECT TEAM 3: Policies, Processes, and Procedures

Scope of Work

- **NIST PWWG Project Team 3: Policies, Processes, and Procedures**

- **Project Team Abbreviation: (PT3)**

1) Function: GOVERN-P (GV-P):

- Category (GV.PO-P): Governance Policies, Processes, and Procedures
- Subcategories (6): GV.PO-P1 through GV.PO-P6

2) Function: CONTROL-P (CT-P):

- Category (CT.PO-P): Data Processing Policies, Processes, and Procedures
- Subcategories (4): CT.PO-P1 through CT.PO-P4

3) Function: COMMUNICATE-P (CM-P):

- Category (CM.PO-P): Communication Policies, Processes, and Procedures
- Subcategories (2): CM.PO-P1 and CM.PO-P2

PROJECT TEAM 3: Policies, Processes, and Procedures

Scope of Work: Privacy Framework

PROJECT TEAM 3 CATEGORIES		
Function	Category	Subcategory
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.	Governance Policies, Processes, and Procedures (GV.PO-P): The policies, processes, and procedures to manage and monitor the organization's regulatory, legal, risk, environmental, and operational requirements are understood and inform the management of privacy risk.	GV.PO-P1: Organizational privacy values and policies (e.g., conditions on data processing such as data uses or retention periods, individuals' prerogatives with respect to data processing) are established and communicated.
		GV.PO-P2: Processes to instill organizational privacy values within system/product/service development and operations are established and in place.
		GV.PO-P3: Roles and responsibilities for the workforce are established with respect to privacy.
		GV.PO-P4: Privacy roles and responsibilities are coordinated and aligned with third-party stakeholders (e.g., service providers, customers, partners).
		GV.PO-P5: Legal, regulatory, and contractual requirements regarding privacy are understood and managed.
		GV.PO-P6: Governance and risk management policies, processes, and procedures address privacy risks.
CONTROL-P (CT-P): Develop and implement appropriate activities to enable organizations or individuals to manage data with sufficient granularity to manage privacy risks.	Data Processing Policies, Processes, and Procedures (CT.PO-P): Policies, processes, and procedures are maintained and used to manage data processing (e.g., purpose, scope, roles and responsibilities in the data processing ecosystem, and management commitment) consistent with the organization's risk strategy to protect individuals' privacy.	CT.PO-P1: Policies, processes, and procedures for authorizing data processing (e.g., organizational decisions, individual consent), revoking authorizations, and maintaining authorizations are established and in place.
		CT.PO-P2: Policies, processes, and procedures for enabling data review, transfer, sharing or disclosure, alteration, and deletion are established and in place (e.g., to maintain data quality, manage data retention).
		CT.PO-P3: Policies, processes, and procedures for enabling individuals' data processing preferences and requests are established and in place.
		CT.PO-P4: A data life cycle to manage data is aligned and implemented with the system development life cycle to manage systems.
COMMUNICATE-P (CM-P): Develop and implement appropriate activities to enable organizations and individuals to have a reliable understanding and engage in a dialogue about how data are processed and associated privacy risks.	Communication Policies, Processes, and Procedures (CM.PO-P): Policies, processes, and procedures are maintained and used to increase transparency of the organization's data processing practices (e.g., purpose, scope, roles and responsibilities in the data processing ecosystem, and management commitment) and associated privacy risks.	CM.PO-P1: Transparency policies, processes, and procedures for communicating data processing purposes, practices, and associated privacy risks are established and in place.
		CM.PO-P2: Roles and responsibilities (e.g., public relations) for communicating data processing purposes, practices, and associated privacy risks are established.

PROJECT TEAM 3: Policies, Processes, and Procedures

Progress Update

- On Monday 31st January PT3 had a kick-off meeting.
Bi-weekly meetings will be held on Thursdays 10 am PST
First project team 3 working session is scheduled for February 17, 2022 at 1pm EST/10am PST.
- All meeting minutes can be accessed on the [Project Team 3 - Google Drive](#).

PROJECT TEAM 3: Policies, Processes, and Procedures

Next Steps

- Project Team members to review the PWWG reference documents folder on the Google Drive to familiarize with the goals and expectations of the Project Team and the NIST PWWG.
- PT3 Will begin brainstorming TKS Statements at the next meeting.

PROJECT TEAM 3: Policies, Processes, and Procedures

Recurring Meetings

Biweekly on Thursdays from 1:00 PM ET to 2:00 PM ET

Next meeting:

Thursday, February 17, 2022

PROJECT TEAM 3: Policies, Processes, and Procedures

Mailing List Sign-Up



PrivacyWorkforcePT3+subscribe@list.nist.gov



**NEXT STEPS &
UPCOMING MEETINGS**

Privacy Workforce Public Working Group

Next Steps

- Project Teams continue to work with Co-Chairs to finalize TKS Statements
- PT3 begins to develop TKS Statements
- NIST PWWG Team spins up PT4
- NIST builds out PF/TKS mapping

Privacy Workforce Public Working Group

Upcoming Meetings

Project Team 1: Risk Assessment (ID.RA-P)

Wednesday, February 16, 2022 | 5:00pm - 6:00pm ET

Project Team 2: Inventory and Mapping (ID.IM-P)

Monday, February 28, 2022 | 12:00pm ET – 1:00pm ET

Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CM.PO-P, CT.PO-P)

Thursday, February 17, 2022 | 1:00pm ET – 2:00pm ET

NIST Privacy Workforce Public Working Group

Wednesday, March 9, 2022 | 1:00pm ET – 2:00pm ET

* For updated meeting schedules see the [PWWG web page](#).

Privacy Workforce Public Working Group

Mailing Lists

- PWWG (PrivacyWorkforceWG@list.nist.gov)
- Project Team (PT1) (PrivacyWorkforcePT1@list.nist.gov)
- Project Team 2 (PT2) (PrivacyWorkforcePT2@list.nist.gov)
- Project Team 3 (PT3) (PrivacyWorkforcePT3@list.nist.gov)
- Project Team 4 (PT4) (PrivacyWorkforcePT4@list.nist.gov)
- **All mailing lists are moderated**

Privacy Workforce Public Working Group

Troubleshooting

- Email questions to pwwg@nist.gov



Q & A