



NIST Privacy Workforce Public Working Group

Meeting #13

Wednesday, May 11, 2022

INTRODUCTION

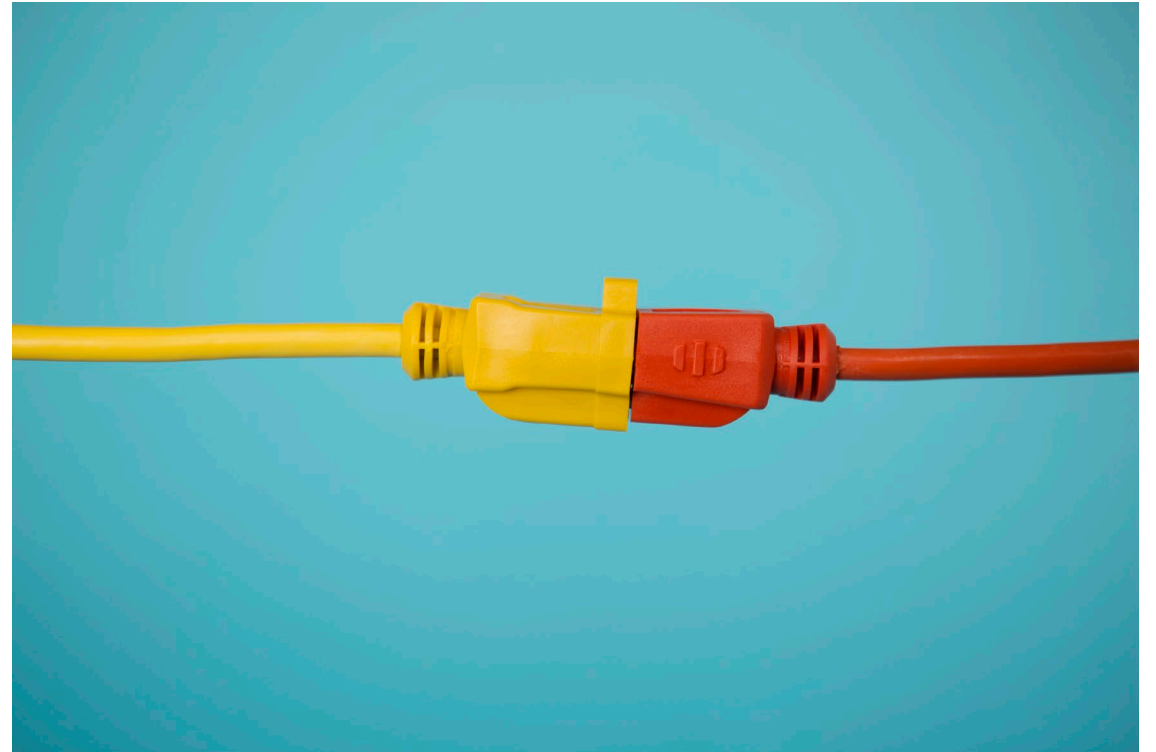


PWWG UPDATES

PWWG Updates

Privacy Framework >< PWWG TKS Mapping

- Mapping of completed TKS Statements to Privacy Framework Core
- Read-only PDFs, accessible to PWWG members via References Folder in shared Google Drives
- Link: [PWWG Reference Documents Folder - Google Drive](#)



PWWG Updates

Call for PT5 Leads!

- PT1 wrapping up in coming weeks. NIST has begun process of spinning up PT5
- Business Environment (ID.BE-P)
- “The organization’s mission, objectives, stakeholders, and activities are understood and prioritized; this information is used to inform privacy roles, responsibilities, and risk management decisions.”



PWWG Updates

Call for PT5 Leads!

- Survey will be circulated via the PWWG mailing list no later than 5/13
- Window to volunteer via survey will close no later than 5/20
- Leads will be selected during the next Co-Chairs TKS Review: May 26, 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
Director of Governance, Risk,
Compliance and Privacy, Hudl

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 1 is continuing the review of the PWWG Co-Chairs comments for ID.RA-P1 and ID.RA-P3.
- The team will continue to review the Co-Chair comments for ID.RA-4 and ID.RA-P5 this month.
- The team has agreed to add a third meeting in May in order to finalize the TKS statements.

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

Recurring Meetings

Two meetings each month:

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

Next meeting:

Wednesday, May 18, 2022 | 5:00 – 6:00PM EDT

Additional Meeting – **May 25, 2022 | 5:00 – 6:00PM EDT**

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

Mailing List Sign-Up



PrivacyWorkforcePT1+subscribe@list.nist.gov

PROJECT TEAM UPDATES

**PROJECT TEAM 3:
Policies, Processes, and Procedures
(GV.PO-P, CT.PO-P, CM.PO-P)**

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

Team Co-Leads



Dan LoPresto

Director, Privacy Compliance
University of Central Florida
(UCF)



Nandita Rao Narla

Senior Privacy Program Manager
Door Dash

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

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 (GV.PO-P, CT.PO-P, CM.PO-P)

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 (GV.PO-P, CT.PO-P, CM.PO-P) Progress Update

Working on drafting TKS statements for:

GV.PO-P: Governance Policies, Processes, and Procedures

- 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.

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

Next Steps

- PT3 will continue brainstorming TKS Statements for GV.PO-P3 at the next meeting.

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

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

Next meeting:

Thursday, May 12, 2022

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

Mailing List Sign-Up

PrivacyWorkforcePT3+subscribe@list.nist.gov

PROJECT TEAM UPDATES

PROJECT TEAM 4:

**Data Processing Ecosystem
Risk Management (ID.DE-P)**

Project Team 4: Data Processing Ecosystem (ID.DE-P)

Team Co-Leads



Tahir Latif

Head of Practice - Data Protection,
Artificial Intelligence and Analytics
(APAC & EMEA) Cognizant
Worldwide



Paul Lanois

Director, Fieldfisher



Anne Connell

Senior Cybersecurity Engineer,
Software Engineering Institute
Carnegie Mellon University

Project Team 4: Data Processing Ecosystem (ID.DE-P)

Task, Knowledge, Skill Statements (TKS)

Project Team 4:

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

Subcategory	Description
ID.DE-P1:	Data processing ecosystem risk management policies, processes, and procedures are identified, established, assessed, managed, and agreed to by organizational stakeholders.
ID.DE-P2:	Data processing ecosystem parties (e.g., service providers, customers, partners, product manufacturers, application developers) are identified, prioritized, and assessed using a privacy risk assessment process.
ID.DE-P3:	Contracts with data processing ecosystem parties are used to implement appropriate measures designed to meet the objectives of an organization's privacy program.
ID.DE-P4:	Interoperability frameworks or similar multi-party approaches are used to manage data processing ecosystem privacy risks.
ID.DE-P5:	Data processing ecosystem parties are routinely assessed using audits, test results, or other forms of evaluations to confirm they are meeting their contractual, interoperability framework, or other obligations.

Project Team 4: Data Processing Ecosystem (ID.DE-P)

Progress Update

Currently working on drafting TKS statements for :

- **ID.DE-P1**: Data processing ecosystem risk management policies, processes, and procedures are identified, established, assessed, managed, and agreed to by organizational stakeholders.
- **ID.DE-P2**: Data processing ecosystem parties (e.g., service providers, customers, partners, product manufacturers, application developers) are identified, prioritized, and assessed using a privacy risk assessment process.

Project Team 4: Data Processing Ecosystem (ID.DE-P)

Progress Update - 2

PT4 added 50+ new members in May!

Goals for May work period:

- Finalize initially approved TKS statements for ID.DE-P1
- Continue the development of TKS statements for the ID.DE-P subcategories

Project Team 4: Data Processing Ecosystem (ID.DE-P)

Recurring Meetings

Two meetings each month:

- 1st & 3rd Thursday of the month | 2:00 PM to 3:00 PM EDT
- Next meeting:
Thursday, May 19, 2022

Project Team 4: Data Processing Ecosystem (ID.DE-P)

Mailing List Sign-Up



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RESOURCES DISCUSSION

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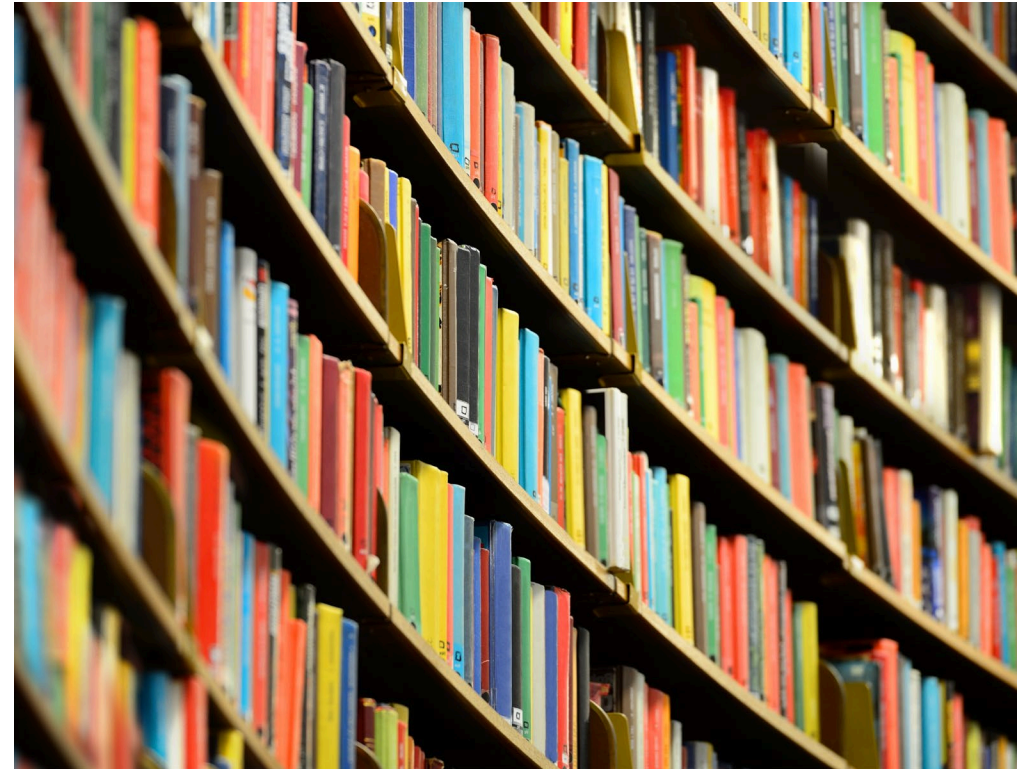
To resource or not to resource...?



RESOURCES DISCUSSION

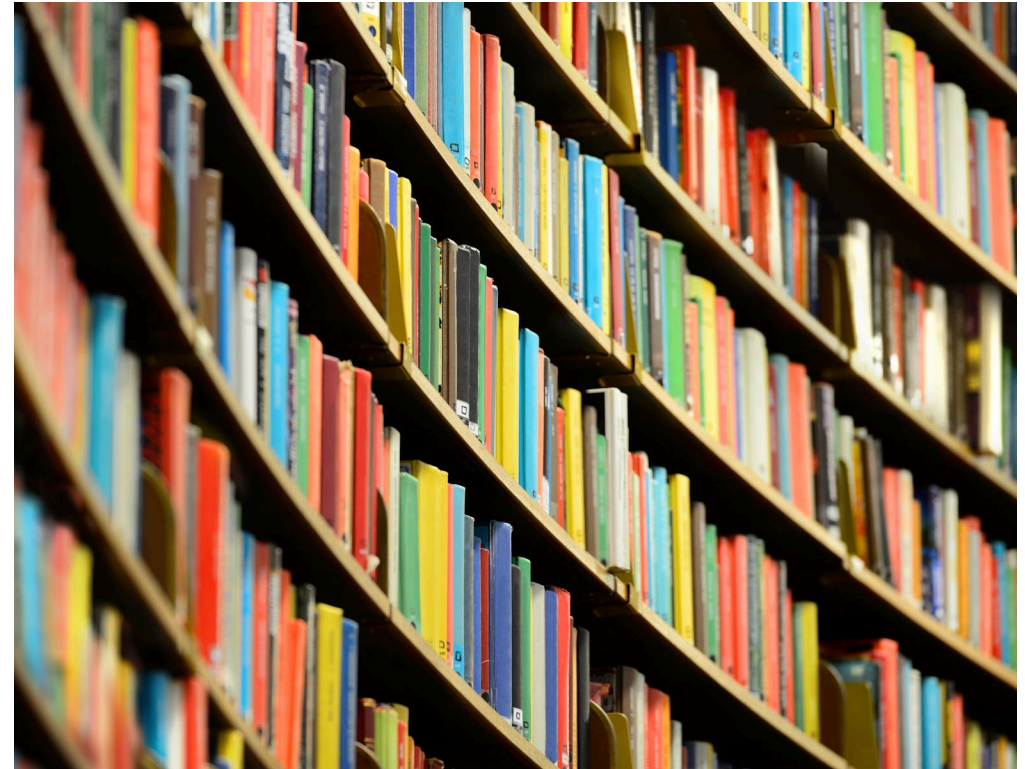
TYPES OF RESOURCES

- Citations to informative references (e.g. academic scholarship, reports)
- Explanatory notes
- Links to related NIST publications (e.g., NISTIR, SP series)



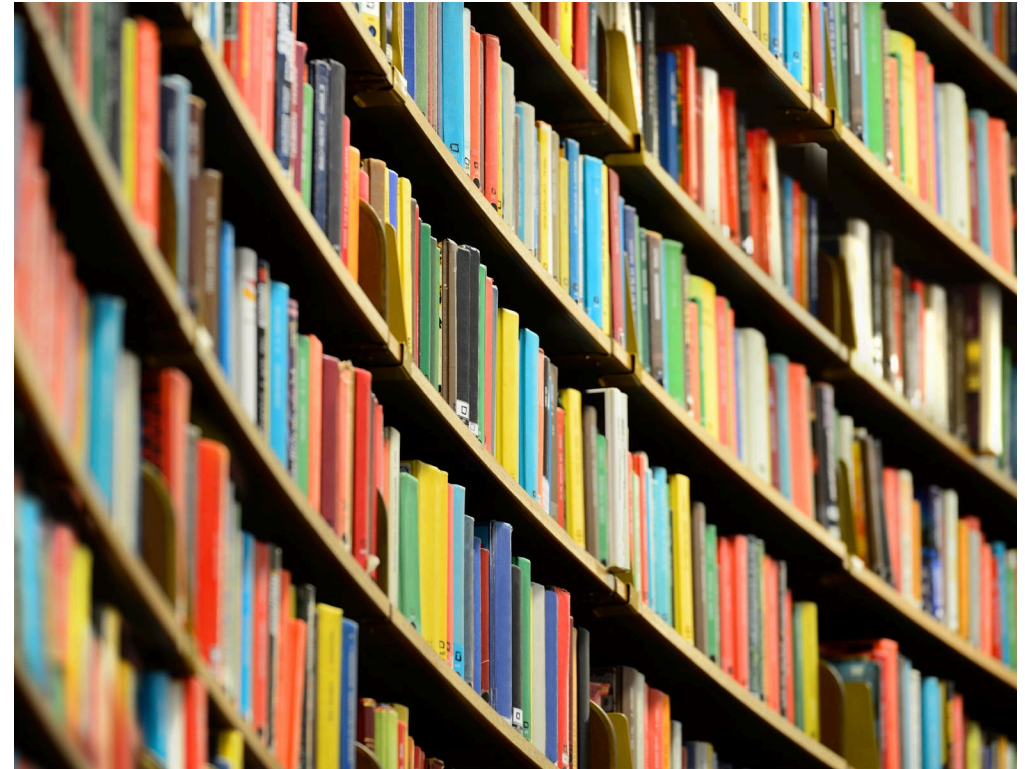
RESOURCES DISCUSSION CONSIDERATIONS

- A methodology (principles and rules) for determining when to include a given resource would be required.
- A methodology (principles and rules) for determining which resource(s) to include would be required.
- Intended audience(s)?
- How do we keep these resources up-to-date?



RESOURCES DISCUSSION OPTIONS

- Move forward with including resources and begin implementation process (i.e., who, what, when?)
- Opt-out of including resources as part of core PWWG work
- Save for a later stage in the PWWG process (i.e., after the first set of TKS Statements are published)





**NEXT STEPS &
UPCOMING MEETINGS**

Privacy Workforce Public Working Group

Next Steps

- PT1 works with Co-Chairs to finalize TKS Statements. Targeting completion around late May/early June
- PT3 and PT4 continue to develop TKS Statements for initial Co-Chair review
- NIST spins up PT5

Privacy Workforce Public Working Group

Upcoming Meetings

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

Wednesday, May 18, 2022 | 5:00pm - 6:00pm EDT

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

Completed

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

Thursday, May 12, 2022 | 1:00pm – 2:00pm EDT

Project Team 4: Data Processing Ecosystem Risk Management (ID.DE-P)

Thursday, May 19, 2022 | 2:00pm – 3:00pm EDT

NIST Privacy Workforce Public Working Group

Wednesday, June 8, 2022 | 1:00pm – 2:00pm EDT

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

Privacy Workforce Public Working Group

Mailing Lists

- PWWG (PrivacyWorkforceWG@list.nist.gov)
- Project Team 1 (PT1) (PrivacyWorkforcePT1@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