

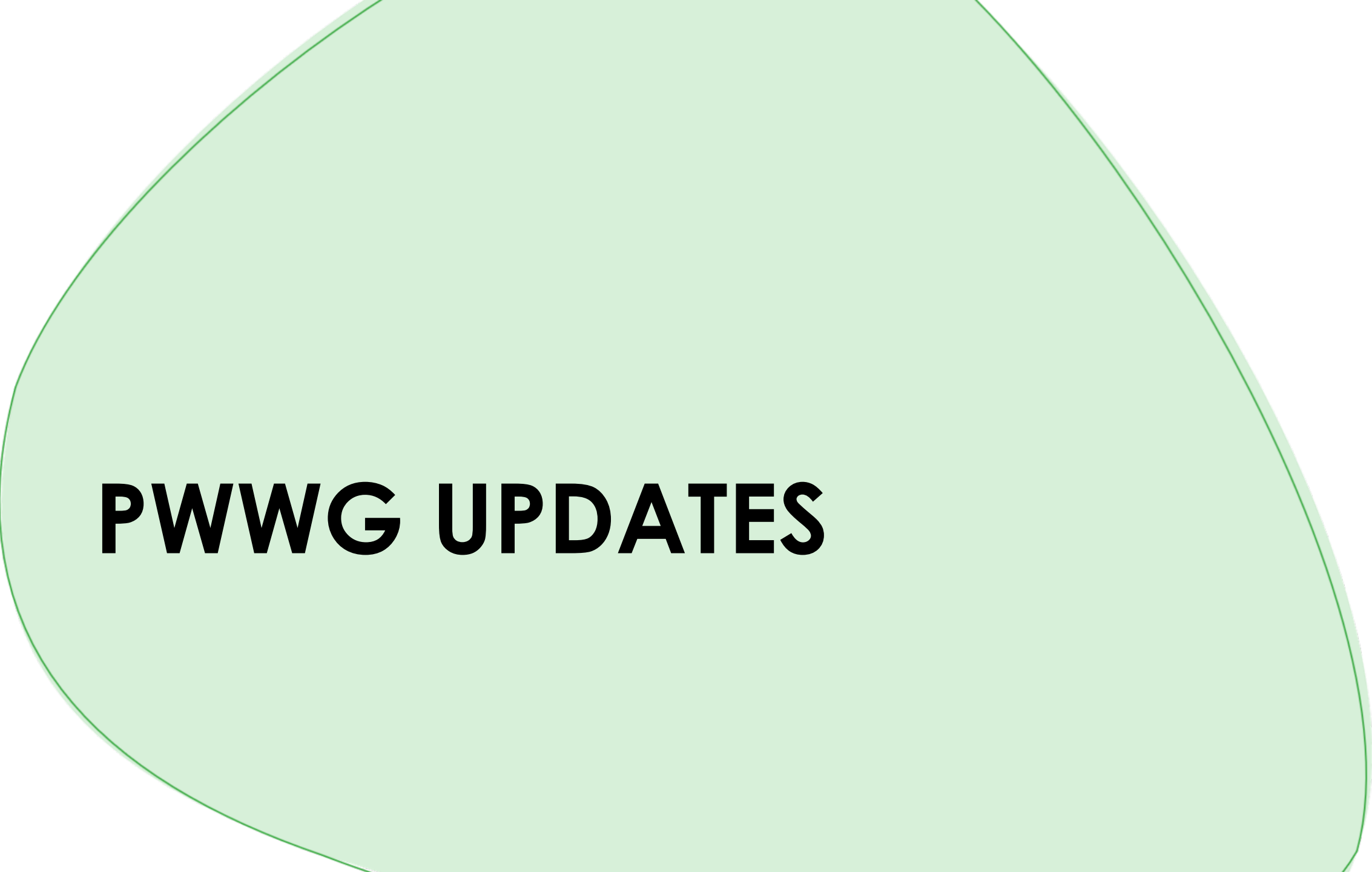


# **NIST Privacy Workforce Public Working Group**

Meeting #16

Wednesday, August 10, 2022

# **INTRODUCTION**



# **PWWG UPDATES**

# PWWG Updates

## PROJECT TEAM 5: BUSINESS ENVIRONMENT

*Off to the races!*



# PWWG Updates

## PROJECT TEAM 5: ASSIGNMENT

**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.

**ID.BE-P1:** The organization's role(s) in the data processing ecosystem are identified and communicated.

**ID.BE-P2:** Priorities for organizational mission, objectives, and activities are established and communicated.

**ID.BE-P3:** Systems/products/services that support organizational priorities are identified and key requirements communicated.

# PWWG Updates

## PROJECT TEAM 5: CO-LEADS



**Anshu Gupta**  
VP, Security and Privacy, CISO  
Span.io



**Brandi M. Bennett, CIPP-US**  
Data Privacy and Security  
Attorney

# PWWG Updates

## PROJECT TEAM 5: NEXT STEPS

- Orientation Session: Tuesday, August 16 (1PM – 2PM EDT)
- Be sure to sign up! [PrivacyWorkforcePT5+subscribe@list.nist.gov](mailto:PrivacyWorkforcePT5+subscribe@list.nist.gov)

# PWWG Updates

## PT1: RISK ASSESSMENT – TKS SNEAK PREVIEW

- ~ 90 Task Statements
- ~ 60 Knowledge Statements
- ~ 60 Skill Statements
- Introducing final TKS Statements in September





# **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 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  
DoorDash



**Alicia Christensen, JD, MS,  
CIPP/US, CIPM**

VP, General Counsel, Chief Compliance  
Officer at National Jewish Health  
Principal Advisor, Frame Privacy Group

# 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

NIST Privacy Framework Core		
Function	Category	Subcategory
<b>GOVERN-P (GV-P):</b> 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.	<b>Governance Policies, Processes, and Procedures (GV.PO-P):</b> 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.	<b>GV.PO-P1:</b> 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.
		<b>GV.PO-P2:</b> Processes to instill organizational privacy values within system/product/service development
		<b>GV.PO-P3:</b> Roles and responsibilities for the workforce are established with respect to privacy.
		<b>GV.PO-P4:</b> Privacy roles and responsibilities are coordinated and aligned with third-party stakeholders (e.g., service providers, customers, partners).
		<b>GV.PO-P5:</b> Legal, regulatory, and contractual requirements regarding privacy are understood and managed.
		<b>GV.PO-P6:</b> Governance and risk management policies, processes, and procedures address privacy risks.
<b>CONTROL-P (CT-P):</b> Develop and implement appropriate activities to enable organizations or individuals to manage data with sufficient granularity to manage privacy risks.	<b>Data Processing Policies, Processes, and Procedures (CT.PO-P):</b> 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.	<b>CT.PO-P1:</b> Policies, processes, and procedures for authorizing data processing (e.g., organizational
		<b>CT.PO-P2:</b> Policies, processes, and procedures for enabling data review, transfer, sharing or disclosure,
		<b>CT.PO-P3:</b> Policies, processes, and procedures for enabling individuals’ data processing preferences and
		<b>CT.PO-P4:</b> A data life cycle to manage data is aligned and implemented with the system development life cycle to manage systems.
<b>COMMUNICATE-P (CM-P):</b> 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.	<b>Communication Policies, Processes, and Procedures (CM.PO-P):</b> 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.	<b>CM.PO-P1:</b> Transparency policies, processes, and procedures for communicating data processing purposes, practices, and associated privacy risks are established and in place.
		<b>CM.PO-P2:</b> 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

- The Project Team is currently reviewing and discussing the Co-Chair comments for the TKS Statements for GV.PO-P1.
- **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) Recurring Meetings

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

Next meeting:

**Thursday, August 18, 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](mailto: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
<b>ID.DE-P1:</b>	Data processing ecosystem risk management policies, processes, and procedures are identified, established, assessed, managed, and agreed to by organizational stakeholders.
<b>ID.DE-P2:</b>	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.
<b>ID.DE-P3:</b>	Contracts with data processing ecosystem parties are used to implement appropriate measures designed to meet the objectives of an organization's privacy program.
<b>ID.DE-P4:</b>	Interoperability frameworks or similar multi-party approaches are used to manage data processing ecosystem privacy risks.
<b>ID.DE-P5:</b>	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

Goals for July work period:

- Finalize initially approved TKS statements for ID.DE-P2
- 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 & 3<sup>rd</sup> Thursday of the month | 2:00 PM to 3:00 PM EDT
- Next meeting:  
**Thursday, August 18, 2022 | 2:00 PM – 3:00 PM EDT**

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

## Mailing List Sign-Up



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**NEXT STEPS &  
UPCOMING MEETINGS**

# Privacy Workforce Public Working Group

## Next Steps

- NIST PWWG team finalizes TKS inventory and mapping documents with PT1 material
- PT3 finalizes TKS Statements for GV.PO-P
- PT4 continues prepping TKS proposals for Co-Chair review
- PT5 launches

# Privacy Workforce Public Working Group

## Upcoming Meetings

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

**Completed**

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

**Thursday, August 18, 2022 | 1:00pm – 2:00pm EDT**

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

**Thursday, August 18, 2022 | 2:00pm – 3:00pm EDT**

Project Team 5: Business Environment (ID.BE-P)

**1<sup>st</sup> meeting – Tuesday, August 16, 2022 | 1:00pm – 2:00pm EDT**

NIST Privacy Workforce Public Working Group

**Wednesday, September 14, 2022 | 1:00pm – 2:00pm EDT**

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

# Privacy Workforce Public Working Group

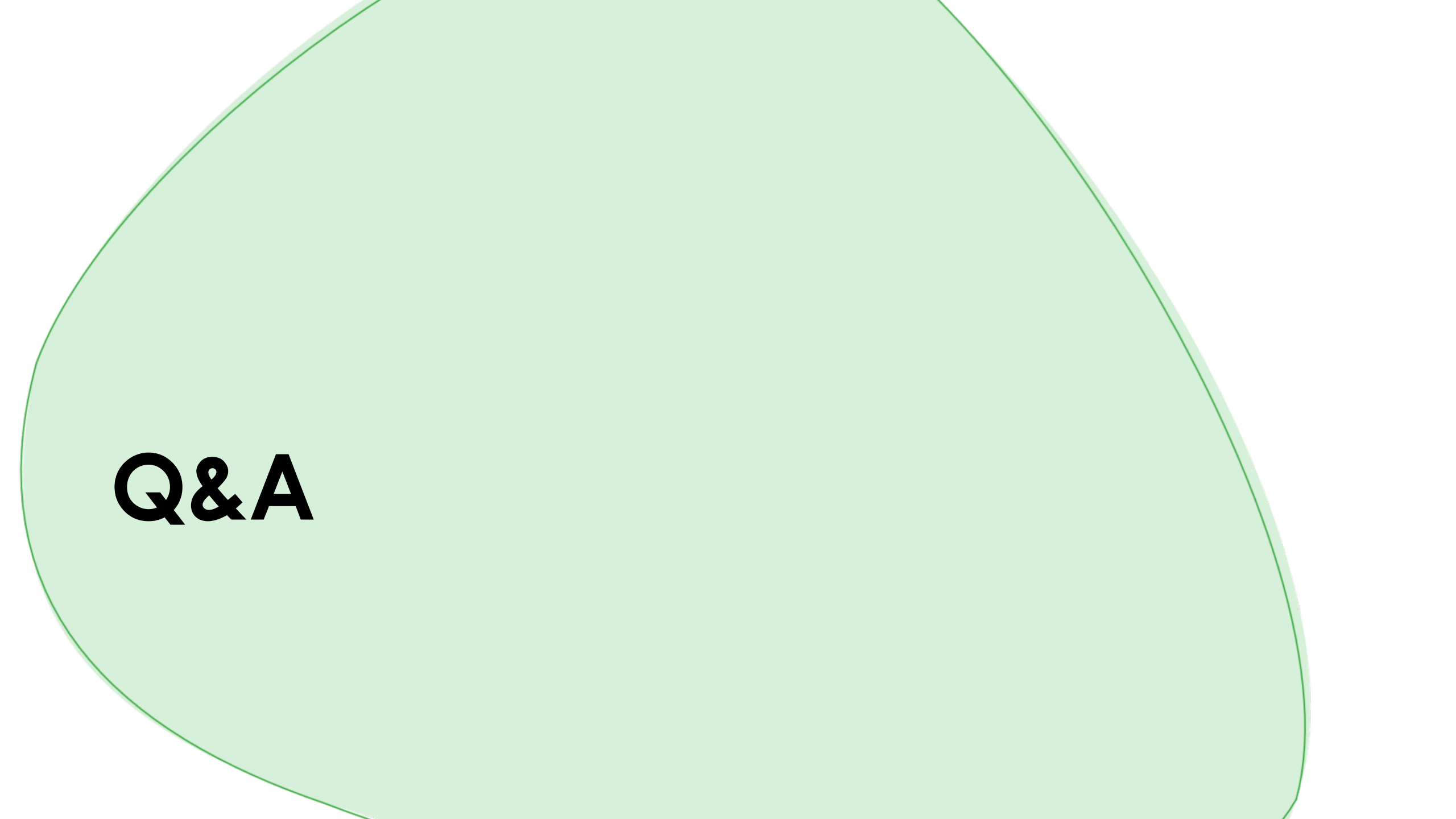
## Join Our Mailing Lists

- Privacy Workforce Working Group (PWWG):  
[PrivacyWorkforceWG+subscribe@list.nist.gov](mailto:PrivacyWorkforceWG+subscribe@list.nist.gov)
- Project Team 3 (PT3):[PrivacyWorkforcePT3+subscribe@list.nist.gov](mailto:PrivacyWorkforcePT3+subscribe@list.nist.gov)
- Project Team 4 (PT4):[PrivacyWorkforcePT4+subscribe@list.nist.gov](mailto:PrivacyWorkforcePT4+subscribe@list.nist.gov)
- Project Team 5 (PT5):[PrivacyWorkforcePT5+subscribe@list.nist.gov](mailto:PrivacyWorkforcePT5+subscribe@list.nist.gov)
- **All mailing lists are moderated**

# Privacy Workforce Public Working Group

## Troubleshooting

- Email questions to [pwwg@nist.gov](mailto:pwwg@nist.gov)



**Q&A**