

NIST PRIVACY WORKFORCE PUBLIC WORKING GROUP (PWWG)

Co-Chair: Dylan Gilbert, Privacy Policy Advisor, National Institute of Standards and Technology

MEETING MINUTES

Wednesday, March 8, 2023

1:00 P.M. ET – 2:00 P.M. ET

I. INTRODUCTION

The 21st meeting of the National Institute of Standards and Technology (NIST) Privacy Workforce Public Working Group (PWWG) convened on Wednesday, March 8, 2023, from 1:00 P.M. ET - 2:00 P.M. ET virtually via Microsoft Teams.

Co-Chair: Dylan Gilbert, Privacy Policy Advisor, NIST, welcomed and thanked the members and Project Teams Leads for their participation. The Co-Chair provided a brief overview of the agenda that included goals and changes within the PWWG and Project Team updates from Project Team 3: Policies, Processes, And Procedures (GV.PO-P, CT.PO-P, and CM.PO-P), and Project Team 4: Data Processing Ecosystem Risk Management (ID.DE-P) and Project Team 5: Business Environment (ID.BE-P).

II. PWWG UPDATES

Co-Chair: Dylan Gilbert provided a brief update of the general status of the current and new PWWG Project Teams.

A. PROGRESS TO DATE

PWWG Co-Chair Dylan Gilbert reminded the Project Team members that the approved TKS Statements can assist as a guide in developing new TKS Statements. For further information, please refer to the meeting minutes from the February PWWG Monthly meeting¹.

- **Completed Project Teams:**
 - Project Team 1: Risk Assessment (ID.RA-P)
 - Project Team 2: Inventory and Mapping (ID.IM-P)
- **Active Project Teams:**
 - Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P)
 - Project Team 4: Data Processing Ecosystem Risk Management (ID.DE-P)
 - Project Team 5: Business Environment (ID.BE-P)

- **TKS Documents (Inventory Document and Mapping Document)**

The PWWG membership will have read-only access to this TKS Reference Document via the shared Google Drive² to view the final TKS Statements submitted by Project Teams. PWWG Co-Chair Dylan Gilbert noted that they will leverage the TKS Statements for the Protect -P function as soon as the National Initiative for Cybersecurity Education Workforce Framework for Cybersecurity (NICE) has completed their updates.

The NIST Team will also review the TKS Statements for conformance during a later phase.

¹ [2023-02-08 PWWG Meeting Minutes](#)

² [PWWG Reference Documents - Google Drive](#)

The PWWG membership will have an opportunity to provide comments and feedback on the final TKS Statements within the near future.

- **TKS Statements Final (Version 2) Inventory³**
The final TKS Statement - Inventory document provides an alphabetized list of approved Task, Knowledge, and Skill (TKS) Statements according to their Task, Knowledge, or Skill Statement ID number.
- **TKS Statements Final (Version 2) Mapping⁴**
The final TKS Statement - Mapping document provides the list of approved Task, Knowledge, and Skill (TKS) Statements associated with the specific Privacy Framework Categories and Subcategories.

B. REVIEW OF GOALS AND CHANGES FOR 2023

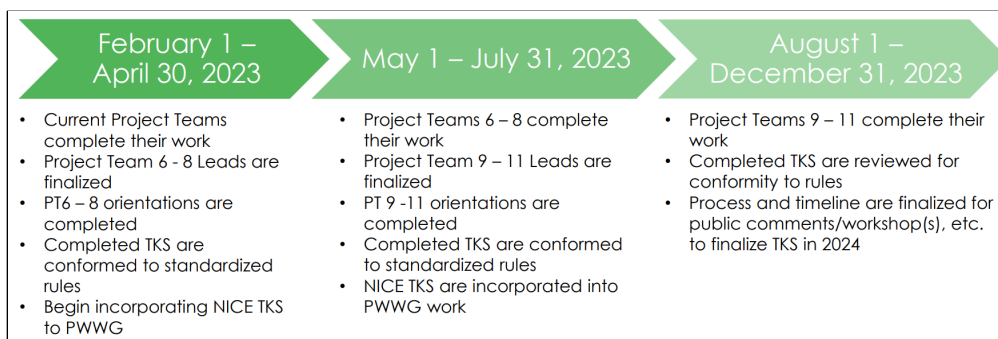
Dylan Gilbert provided a brief background and status update of the PWWG’s goals and changes for 2023.

a. GOALS FOR 2023

Dylan Gilbert noted that the current Project Teams are mid-way through the first target work period and are on schedule to complete their work by April 30th. The selection of the Project Team Co-Leads and orientation of Project Teams 6, 7, and 8 will be finalized during this time frame.

Project Team sign-ups and further information will be distributed to the PWWG mailing list at a later date.

i. TARGET TIMELINE FOR REMAINING CATEGORIES



b. CHANGES FOR 2023

The NIST PWWG will make additional improvements to the process to ensure the Project Teams meet the current timelines and to provide additional consistency and clarity to the development of TKS Statements. The changes will affect the new project Teams after April 30th and allow for Phase 2 to start in January 2024.

³ [TKS Statements Final \(Version 2\) Inventory](#)

⁴ [TKS Statements Final \(Version 2\) Mapping](#)

i. NEW PROJECT TEAM PROCEDURES

- The Project Team TKS Workbook will be prepopulated with both approved and notional TKS Statements from completed Project Teams as well as TKS Statements generated by the Project Team Leads and Co-Chairs as the initial set for review and discussion. Project Team members will be able to continue to provide comments during and between meetings for discussion.

c. PAQ: POTENTIALLY ASKED QUESTIONS

For further questions or concerns regarding the PWWG updates, please email us at pwwg@nist.gov.

1) Q: Will Project Team Members still be able to suggest new TKS Statements?

A: Yes, both in real time during Project Team meetings and via comments in the TKS Workbook in between meetings.

2) Q: Will these changes affect current Project Teams?

A: Except for the April 30th deadline to complete their work, all other changes are optional for current Project Teams.

3) Q: How do these changes affect the work we've already completed?

A: To the extent that there are inconsistencies among completed TKS Statements (e.g., style, tone, etc.), those will be standardized by the NIST Team.

d. MEMBER INTEREST SURVEY

Dylan Gilbert reminded the PWWG membership to complete the distributed survey. The PWWG Survey ⁵is available on the Privacy Workforce Public Working Group⁶ web page. The survey will determine the next Privacy Framework Categories, their corresponding Project Teams, and sign-ups for participation on a "Sprint Team," which will identify TKS Statements associated with the [NICE Workforce Framework for Cybersecurity](#) that map to the Protect-P Function in the [NIST Privacy Framework](#).

In addition, we are seeking feedback from the PWWG membership to advise if any of the Privacy Framework Categories can be combined similar to how Project Team 3 combined Govern, Communicate, and Control Categories.

III. PROJECT TEAM UPDATES

A. UPDATE OF PROJECT TEAM 3: POLICIES, PROCESSES, AND PROCEDURES ACTIVITIES

For reference purposes, the NIST PWWG Project Team 3: Policies, Processes, and Procedures, will create TKS Statements for (12) Subcategories from the NIST Privacy Framework Core V1.

- **CATEGORY:** Governance Policies, Processes, and Procedures (GV.PO-P): The policies, processes, and procedures to manage and monitor the organization's

⁵ [PWWG Member Survey \(google.com\)](#)

⁶ [Privacy Workforce Public Working Group | NIST](#)

regulatory, legal, risk, environmental, and operational requirements are understood and inform the management of privacy risk.

- **SUBCATEGORIES:**
 - **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.
- **CATEGORY: 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.
 - **SUBCATEGORIES:**
 - **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.
- **CATEGORY: 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.

- **SUBCATEGORIES:**

- **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 Co-Lead, Nandita Narla, DoorDash, provided a brief background and status of Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, and CM.PO-P) TKS Statements and activities. The Project Team Co-Leads Dan LoPresto, Director of Privacy Compliance, University of Central Florida, and Alicia Christensen, VP, General Counsel, Chief Compliance Officer at National Jewish Health Principal Advisor, Frame Privacy Group were not present.

The Project Team has completed the GV.PO-P1 through GV.PO-P6 Subcategories and the review of Co-Chair feedback. The approved TKS Statements are available on the Project Team 3 Google Drive⁷ for reference. The Project Team Google Drives are accessible to those members who have signed up through the mailing list.

More recently, the Project Team has completed TKS Statements for CT.PO-P1 through CT.PO-P3. Upon completion of the remaining Subcategories within the CT Category, the Project Team Co-Leads will submit the completed TKS Statements to the PWWG Co-Chairs for review.

It was noted that one of the challenges of the Project Team is managing group discussions to remain focused on the related TKS Statements and to ensure that it's in alignment with the Subcategory. The Project Team Co-Leads learned that drafting TKS Statements in advance for group discussion is a more efficient process.

The Project Team will continue review and refine their TKS Statements for CT.PO-P during their next meeting.

The Project Team Co-Leads encourage the expertise and perspectives of the NIST PWWG Membership to participate in the development process of the TKS Statements. To join the NIST PWWG Project Team 3 Mailing List, please see the Join Mailing List Section under Section VI. Next Steps and Upcoming Meetings.

B. UPDATE OF PROJECT TEAM 4: DATA PROCESSING ECOSYSTEM RISK MANAGEMENT (ID.DE-P)

For reference purposes, the NIST PWWG Project Team 4: Data Processing Ecosystem, will create TKS Statements for (5) Subcategories from the NIST Privacy Framework Core V1.

CATEGORY: Data Processing Ecosystem Risk Management (ID.DE-P): The organization's priorities, constraints, risk tolerance, and assumptions are established and used to support risk decisions associated with managing privacy risk and third parties within the data processing ecosystem. The organization has established and implemented the processes to identify, assess, and manage privacy risks within the data processing

⁷ [NIST PWWG - Privacy Workforce Project Team 3 - Google Drive](#)

ecosystem.

SUBCATEGORIES:

- 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.

PWWG Co-Chair Dylan Gilbert, provided a brief update of Project Team 4 activities. The Project Team 4 Co-Leads, Tahir Latif, Head of Practice - Data Protection, Artificial Intelligence and Analytics (APAC & EMEA) Cognizant Worldwide, Paul Lanois, Director, Fieldfisher, and Anne Connell Senior Cybersecurity Engineer, Carnegie Mellon University, were not present.

The Project Team has completed Subcategories ID.DE-P1 through ID.DE-P3. Currently, the Project Team is awaiting the feedback from the PWWG Co-Chair review of the submitted TKS Statements for ID.DE-P1 and ID.DE-P2.

The Project Team will begin drafting TKS Statements for ID.DE-P4 and review the PWWG Co-Chair feedback for TKS Statements for ID.DE-P1 and ID.DE-P2.

The Project Team Co-Leads continue to encourage the expertise and perspectives of the NIST PWWG Membership to participate in the development process of the TKS Statements and continue to provide their proposed TKS Statements and comments in between meetings in preparation for discussion.

The Project Team 4 Mailing List is currently open for those interested in participating. To join the NIST PWWG Project Team 4 Mailing List, please see the Join Mailing List Section under Section VI. Next Steps and Upcoming Meetings.

C. UPDATE OF PROJECT TEAM 5: BUSINESS ENVIRONMENT (ID.BE-P) ACTIVITIES

For reference purposes, Project Team 5 is tasked with the development of the TKS Statements for (3) Subcategories from the NIST Privacy Framework Core V1⁸. Business Environment (ID.BE-P) is the last Category of the IDENTIFY-P (ID-P) Function to be completed.

FUNCTION: IDENTIFY-P (ID-P): Develop the organizational understanding to manage privacy risk for individuals arising from data processing.

⁸ [NIST Privacy Framework Core](#)

- **CATEGORY: 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 Co-Chair Dylan Gilbert, provided a brief update of Project Team 5 activities. The Project Team 5 Co-Leads Anshu Gupta VP, Security and Privacy, CISO Span.io and Brandi M. Bennett, CIPP-US Data Privacy and Security Attorney were not present.

The Project Team has completed Subcategories ID.BE-P1 through ID.BE-P2. Currently, the Project Team is awaiting the feedback from the PWWG Co-Chair review of the submitted TKS Statements for ID.BE-P1 and ID.BE-P2.

The Project Team will begin drafting TKS Statements for ID.BE-P3 and review the PWWG Co-Chair feedback for TKS Statements for ID.BE-P1 and ID.BE-P2.

The Project Team Co-Leads continue to encourage the expertise and perspectives of the NIST PWWG Membership to participate in the development process of the TKS Statements and continue to provide their proposed TKS Statements and comments in between meetings in preparation for discussion.

To join the NIST PWWG Project Team 5 Mailing List, please see the Join Mailing List Section under Section VI. Next Steps and Upcoming Meetings.

IV. Q & A

1) Q: Can those who have non-google accounts get a separate survey link for the current PWWG Survey?

A: Members can fill out the Google Forms survey without having a Google account. However, participation on the PWWG Project Teams will require use of the Google Suite platform for documentation and information.

2) Q: If I have my team joining Project Teams, do they need to join the PWWG general group first?

A: Please note that joining a PWWG Project Team does not automatically enroll you in the PWWG general mailing list. By subscribing to the PWWG mailing list, member will receive notices of meetings and other updates.

To subscribe, email PrivacyWorkforceWG+subscribe@list.nist.gov.

3) Q: How do I join a specific Project Team?

A: To join the NIST PWWG Project Team Mailing List, please see the Join Mailing List Section under Section VI. Next Steps and Upcoming Meetings. If you should need further information, please email pwwg@nist.gov.

4) Q: Is there any mapping of privacy frameworks/standards/guidance document as part of privacy framework? (Example: covering different laws with privacy tools/policies, etc.)

A: Yes, crosswalks between the NIST Privacy Framework Core and various laws, regulations, and standards can be found in the Privacy Framework online Resource Repository.⁹

5) Q: Is there a mapping to Bill 64, An Act to modernize legislative provisions as regards the protection of personal information. (Quebec)

A: No.

V. NEXT STEPS & UPCOMING MEETINGS

• NEXT STEPS

- Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CM.PO-P, CT.PO-P) will complete drafting TKS statements for CT.PO-P4 and begin drafting TKS statements for CM.PO-P1.
- Project Team 4: Data Processing Ecosystem Risk Management (ID.DE-P) will start to develop TKS Statements for ID.DE-P4 and review the Co-Chair feedback for ID.DE-P1 and ID.DE-P2.
- Project Team 5: Business Environment (ID.BE-P) will continue drafting TKS Statements for ID.BE-P3 and review Co-Chair feedback for ID.BE-P1 and ID.BE-P2 when their review is completed.

• UPCOMING MEETINGS

The upcoming meetings of the NIST PWWG and its Project Teams are noted below. For further information and updated meeting schedules, please visit the [NIST Privacy Workforce Working Group](#) website.

- **Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CM.PO-P, CT.PO-P)**
 - Thursday, March 16, 2023 | 1:00pm EDT – 2:00pm EDT
- **Project Team 4: Data Processing Ecosystem Risk Management (ID.DE-P)**
 - Thursday, March 9, 2023 | 2:00pm EDT – 3:00pm EDT
- **Project Team 5: Business Environment (ID.BE-P)**
 - Tuesday, March 14, 2023 | 1:00pm EDT – 2:00pm EDT
- **NIST Privacy Workforce Public Working Group**
 - Wednesday, April 12, 2023 | 1:00pm EDT – 2:00pm EDT

• NEW BUSINESS OPEN TOPICS

New Business Open Discussion Topics Drop Box is available on the [NIST Privacy Workforce Working Group](#) webpage. If you are interested in presenting a business topic during a PWWG

⁹ [Crosswalks | NIST](#)

Monthly Meeting, please visit the webpage noted above.

- **JOIN MAILING LIST**

All mailing lists are moderated. Please be reminded to review adhere to the Mailing List Rules that can be accessed on the [NIST Privacy Workforce Working Group](#) website.

- E-mail addresses for members to join/subscribe:
 - Privacy Workforce Working Group (PWWG): PrivacyWorkforceWG+subscribe@list.nist.gov
 - Project Team 3 (PT3): PrivacyWorkforcePT3+subscribe@list.nist.gov
 - Project Team 4 (PT4): PrivacyWorkforcePT4+subscribe@list.nist.gov
 - Project Team 5 (PT5): PrivacyWorkforcePT5+subscribe@list.nist.gov

- **TROUBLESHOOTING:**

If you should have issues with meeting invitations, mailing lists, and/or accessing the Google Drives, please email NIST PWWG Support at PWWG@nist.gov