

# NIST PRIVACY WORKFORCE PUBLIC WORKING GROUP (PWWG)

Co-Chair: Dylan Gilbert, NIST Privacy Policy Advisor

## MEETING MINUTES

Wednesday, April 12, 2022

1:00 p.m. – 2:00 p.m. ET

### I. INTRODUCTION

The 22nd meeting of the National Institute of Standards and Technology (NIST) Privacy Workforce Public Working Group (PWWG) convened on Wednesday, February 8th from 1:00 P.M. - 2:00 P.M. ET virtually via Microsoft Teams. There were 37 attendees.

The PWWG provides a forum for participants from the general public, including private industry, the public sector, academia, and civil society, to create the content of the NIST Privacy Workforce Taxonomy. The PWWG is tasked with creating Task, Knowledge, and Skill (TKS) Statements aligned with the [NIST Privacy Framework](#) and the National Initiative for Cybersecurity Education (NICE) [Workforce Framework for Cybersecurity](#).

PWWG Co-Chair, Dylan Gilbert, welcomed attendees and Project Teams Co-Leads and thanked them for their participation.

### II. PWWG UPDATES

#### A. Progress to Date

Two Project Teams have completed their work: Project Team 1: Risk Assessment (ID.RA-P); and Project Team 2: Inventory and Mapping (ID.IM-P). Dylan reminded attendees that there are two TKS documents available for reference on the PWWG Google Drive. The [TKS Inventory](#) is an alphabetized list of all Tasks, Knowledge, and Skill Statements that were approved for Project Teams 1 and 2. The [TKS Mapping](#) document takes those statements and maps them to specific Subcategories within the Privacy Framework.

There are currently three active teams: Project Team 3 (PT3): Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, CM.PO-P); Project Team 4 (PT4): Data Processing Ecosystem Risk Management (ID.DE-P); and Project Team 5 (PT5): Business Environment (ID.BE-P). These active Project Teams are close to finishing up their work. The goal is for these teams to complete their work by the end of April before three new Project Teams are launched to work on three of the remaining six Privacy Framework Categories.

The PWWG Co-Chairs are working to complete their review of the latest completed TKS Statements to provide feedback to the Project Team Co-Leads for their final review.

#### B. 2023 Work: Phase II and III

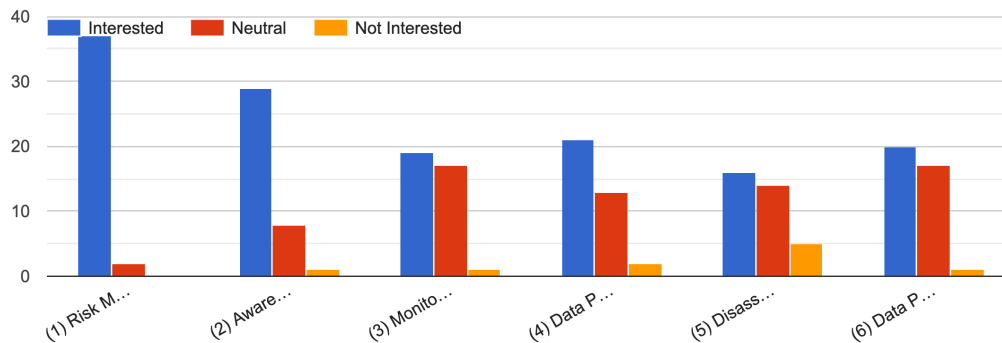
Dylan reported that the PWWG Team sent out a survey to all members in February to gauge interest in working on each future Project Team.

## Member Survey Results

Dylan shared the results of the recent survey, which asked respondents to share their interest in the remaining Privacy Framework Categories. The results of the survey showed a clear preference for the Risk Management Strategy (GV.RM-P) Category in the Govern Function. The second most popular Category chosen for the next Project Team was Awareness and Training, also in the Govern Function (GV.AT-P).

- (1) Risk Management Strategy
- (2) Awareness and Training
- (3) Monitoring and Review
- (4) Data Processing Management
- (5) Disassociated Processing
- (6) Data Processing Awareness

Indicate your level of interest for the following NIST Privacy Framework Categories.



Dylan proposed two options for the next three Project Teams and asked the attendees to vote via a Teams poll for their preferred option. The next three Project Teams will begin their work in May and will run through July or August depending on the Categories selected.

## Project Team Assignments

### Option 1 –Original Proposal

3 Months (May –July) and 14 Subcategories

- (1) Risk Management Strategy (GV.RM-P) -3 Subcategories
- (2) Awareness and Training (GV.AT-P) -4 Subcategories
- (3) Monitoring and Review (GV.MT-P) -7 subcategories

5 Months (August –December) and 23 Subcategories

- (4) Data Processing Management (CT.DM-P) -10 Subcategories
- (5) Disassociated Processing (CT.DP-P) -5 Subcategories
- (6) Data Processing Awareness (CM.AW-P) -8 Subcategories

#### Option 2 –Based on Interest

- 4 Months (May –August) and 17 Subcategories
- (1) Risk Management Strategy (GV.RM-P) -3 Subcategories
- (2) Awareness and Training (GV.AT-P) -4 Subcategories
- (4) Data Processing Management (CT.DM-P) -10 Subcategories

- 4 Months (September –December) and 20 Subcategories
- (3) Monitoring and Review (GV.MT-P) -7 subcategories
- (5) Disassociated Processing (CT.DP-P) -5 Subcategories
- (6) Data Processing Awareness (CM.AW-P) -8 Subcategories

Option one would work on all three remaining Govern Categories, with a total of 14 Subcategories. This option would result in closing out the Govern Function by the end of July.

The Team Poll result showed that Option 2 was the most popular among attendees. One attendee voiced her opinion that completing the remaining Categories of the Govern Function would help to inform the work of other Project Teams given that governance is foundational to a privacy program’s activities.

Dylan invited attendees to share their thoughts with the NIST PWWG Team in the Teams chat or after the meeting by dropping a message in the PWWG listserv. The final, consensus-based decision will be announced in the coming weeks.

#### **Call for Project Team Leads**

Project Team Leads play a very important role. Dylan remarked that it is a lot of work to lead a Project Team and the NIST team is grateful for the work of all of the Team Co-Leads.

Dylan noted that each Project Team is led by two or more Co-Leads. Larger Privacy Framework Categories can have three Co-Leads but, at a minimum, the NIST PWWG team is looking for six Co-Leads for the next three Project Teams (PT6, PT7, PT8) to work from May through August and a further six Co-Leads for the next three Teams beginning in August.

Dylan asked attendees to email the PWWG team at [pwwg@nist.gov](mailto:pwwg@nist.gov) with the following information if they are interested in volunteering in this capacity:

- Name
- Preferred email address
- Which Project Team(s) you’d like to lead (i.e., Privacy Framework Category)
- Link to bio or LinkedIn page

Dylan suggested that anyone who would like to know more about the PWWG Project Teams can

read the [PWWG Charter](#) which can be found on the [PWWG webpage](#) and the [PWWG Reference Documents](#) folder.

Although it is possible for someone who has already led a Project Team to lead another Project Team, Dylan noted that the preference would be to let Co-Leads take a break between Teams given the amount of time and effort involved in leading a team. He noted the importance of striking a balance between experience and letting new people in. Any prior experience in running working groups would be helpful.

### **PWWG Survey Recommendations**

The survey asked respondents to provide any comments or recommendations on how the NIST Team can improve the Project Team experience to help future Project Teams. The following suggestions were provided.

- More conference calls/meetings.
- More emphasis/information on member expectations for onboarded members.
- Time caught up in whether to use a particular word vs another word. Focus on overarching activities and then have someone (or a group of someone's) take a pass at wordsmithing later.
- Schedule calls for participants in Asia at a more friendly time. Most calls happen in the middle of the night for us here in Asia.
- Implement reward and recognition (e.g., Credly badge).
- Provide some sort of letter or certificate or anything that helps us document our efforts for our employers!

The NIST Team tries to strike a balance with the number of meetings recognizing how busy everyone is. Dylan noted that the biweekly cadence is most likely going to continue with the new Project Teams, but this is something that can be addressed if people feel that more meetings are needed.

Dylan acknowledged the difficulty in the PWWG meeting schedule when meetings take place during the work day for the US and European audiences, but it means that it is the middle of the night in Asia, for example.

Dylan noted that it can be difficult for new members to get up to speed when they join a team that is already underway. The expectations for team members are listed in the documentation provided by the NIST PWWG team but it does require a lot of reading.

The recent change that has been implemented by the Project Teams to pre-populate some TKS Statements prior to meetings to allow more of a focus on overarching content in the meetings has been well received.

Dylan noted that the NIST Team is discussing the suggestion to provide some sort of recognition for participation on the Project Teams for people to use with their employers. NIST currently gives certificates of appreciation to the Co-Leads when they complete their work with a Project Team.

Dylan invited attendees to share their thoughts on any of these suggestions with the NIST PWWG Team via [pwwg@nist.gov](mailto:pwwg@nist.gov).

### III. PROJECT TEAM UPDATES

#### A. PROJECT TEAM 3: POLICIES, PROCESSES, AND PROCEDURES (GV.PO-P, CT.PO-P, CM.PO-P) ACTIVITIES

Project Team 3 (PT3) is working on drafting TKS Statements for three Policies, Processes, and Procedures Categories comprising a total of twelve Subcategories from three separate Functions: Govern (GV-P); Control (CT-P); and Communicate (CM-P).

**Category 1 - 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.

##### **Subcategories (6):**

- **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 2 - 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 (4):**

- **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 3 - 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 (2):**

- **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.

Co-Lead, Nandita Narla, Senior Privacy Program Manager, DoorDash, gave an update on the work of PT3. The team has completed their work on TKS Statements for all of the GV.PO-P and CT.PO-P Subcategories. They have reviewed the Co-Chair comments for GV.PO-P and are waiting for Co-Chair feedback for all CT.PO-P Subcategories.

Nandita expects PT3 to complete the TKS Statements for CM.PO-P1 during the next PT3 meeting which will leave only one Subcategory, CM.PO-P to complete by the end of April.

Nandita noted the Co-Leads found that, for greater efficiency, spending time drafting TKS statements in advance of the group meeting has allowed more focused discussion during the Project Team meetings and allowed the work to proceed much faster.

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

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

**Subcategories (5):**

- **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.

PT4 Co-Lead, Tahir Latif, Head of Practice -Data Protection, Artificial Intelligence and Analytics, Cognizant Worldwide, gave the update for PT4. The team has completed drafting TKS Statements

for all ID.DE-P Subcategories, ID.DE-P1 through ID.DE-P5. They are awaiting Co-Chair comments on the TKS Statements.

Tahir noted that one of the lessons that the Co-Leads learned was to take some discussions offline for the Co-Leads to iron out after the meeting, particularly when the team was getting hung up on a particular word or phrase. Putting the matter aside for the Co-Leads to work on made for better use of the team's time during meetings.

The goal for PT4 for April is for the Project Team Co-Leads to complete the review of the Co-Chair feedback for all of the ID.DE-P Subcategories (P1-P5) and then to hold one final Project Team meeting to share the final TKS Statements with the larger Team.

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

**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.

**Subcategories:**

- **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.

Dylan announced that PT5 Co-Lead, Anshu Gupta, has decided to step down as PT5 Co-Lead. Dylan expressed his thanks to Anshu for his contributions to the work that PT5 has completed.

PT5 Co-Lead, Brandi Bennet, Data Privacy and Security Attorney, gave the update for PT5. The Project Team has completed draft TKS Statements for Subcategories ID.BE-P1 and ID.BE-P2 and these Statements have been reviewed by the PWWG Co-Chairs. PT5 is very close to completing the TKS Statements for Subcategory ID.BE-P3.

The April goal for PT5 is for Brandi and Dylan to review the Co-Chair feedback for all three ID.BE-P Subcategories' TKS Statements. There are two ad hoc PT5 meetings tentatively scheduled for April 18 and April 25, as needed, to go over the finalized TKS Statements.

#### IV. Q & A

#### V. NEXT STEPS & UPCOMING MEETINGS

##### A. NEXT STEPS

Dylan noted that before the May PWWG meeting the NIST PWWG team will send out details on the next three PWWG Project Teams and the selected Privacy Framework Categories. These

Teams will use the same format as the previous Project Teams. The new Project Team Google Groups will open up for new members to join in the next few weeks.

## B. UPCOMING MEETINGS

The upcoming meetings of the NIST PWWG and its Project Teams are noted below. For further information, including updated meeting schedules, meeting minutes, agendas, and slide deck please visit the [PWWG web page](#).

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

Thursday, April 13, 2023 | 1:00pm – 2:00pm ET

Thursday, April 27, 2023 | 1:00 p.m. – 2:00 p.m. ET - if needed

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

Thursday, April 20, 2023 | 2:00 p.m. – 3:00 p.m. ET – if needed

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

Tuesday, April 18, 2023 | 1:00 p.m. – 2:00 p.m. ET – if needed

Tuesday, May 2, 2023 | 1:00 p.m. – 2:00 p.m. ET – if needed

NIST Privacy Workforce Public Working Group

The NIST PWWG meets on the 2nd Wednesday of each month.

Next meeting: Wednesday, May 10, 2023 | 1:00 p.m. – 2:00 p.m. ET

## C. 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 Monthly Meeting, please visit the webpage noted above.

## D. TROUBLESHOOTING

If you have any technical issues with meeting invitations, mailing lists, and/or accessing the Google Drives, please email NIST PWWG Support at [PWWG@nist.gov](mailto:PWWG@nist.gov).

## E. JOIN MAILING LIST

In order to join one of the Project Teams you must subscribe to its associated mailing list. All mailing lists are moderated. Please be reminded to adhere to the Mailing List Rules that can be found on the [NIST Privacy Workforce Working Group](#) website.

- 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)