



# **NIST Privacy Workforce Public Working Group**

Meeting #28

Wednesday, October 11, 2023

# **INTRODUCTION**

# PWWG Co-Chairs



**Dylan Gilbert**  
Privacy Policy  
Advisor  
*National Institute  
of Standards and  
Technology*



**Doug Forman**  
Certification  
Director  
*International  
Association of  
Privacy  
Professionals*



**Mary N. Chaney,  
Esq., CISSP, CIPP/US**  
Managing Attorney  
*The Law Offices of  
Mary N. Chaney,  
PLLC*



**Melanie Ensign**  
Founder & CEO  
*Discernable, Inc*

# **PWWG UPDATES**

# PWWG Updates

## TKS Compilation Documents – Version 5



212 TASK STATEMENTS



191 KNOWLEDGE  
STATEMENTS



218 SKILL STATEMENTS

# PWWG Updates

## TKS Compilation Documents

[TKS Compilation Inventory](#)

[TKS Compilation Mapping](#)



# PWWG Updates Timeline

## Revised Target Timeline

### **May – October, 2023 [17 Subcategories]**

PT6 Risk Management Strategy (GV.RM-P) - 3 Subcategories

PT7 Awareness and Training (GV.AT-P) - 4 Subcategories

PT8 Data Processing Management (CT.DM-P) - 10 Subcategories

### **November – March, 2023-24 [20 Subcategories]**

PT9 Data Processing Awareness (CM.AW-P) - 8 Subcategories

PT10 Monitoring and Review (GV.MT-P) - 7 subcategories

PT11 Disassociated Processing (CT.DP-P) - 5 Subcategories



# PWWG Updates Timeline

## Revised Target Timeline

### Spring, 2024

- Release Privacy Workforce Taxonomy Public Draft
- Public comment period for Public Draft

### Summer, 2024

- Publish Privacy Workforce Taxonomy, Version 1.0





# PWWG Updates

## Orientation Video

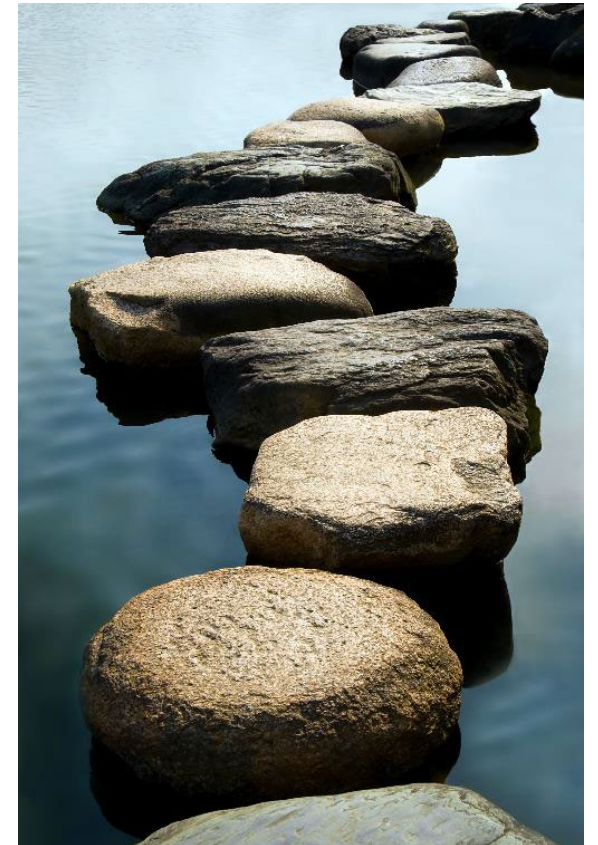
- On demand for all PWWG members
- Finalizing details and then will be posted on webpage
- Anticipated release by November 1



# PWWG Updates

## TKS Standardization: Next Steps

- Include ID.RA-P2 TKS Statements
- Standardize material from PT6 – PT8
- Explore consolidation of additional statements from PT1 – PT5



# PWWG Updates

## Knowledge and Skills Baseline

- Foundational Knowledge and Skill Statements that are applicable across the Privacy Framework Core
- Will be included somewhere in the taxonomy, likely front matter and/or an appendix
- Examples:
  - Knowledge of privacy laws, regulations, standards, and best practices and skill in applying them
  - Collaboration and communication skills



# PWWG Updates

## Co-Chairs Next Steps

- TKS Statement review for PT6 – PT8
- Select Co-Leads for PT9 – PT11



# PWWG Updates

## Co-Chairs Next Steps: Co-Lead Selection

Interested? Send name, preferred email address, and link to your LinkedIn or other bio/CV to: [pwwg@nist.gov](mailto:pwwg@nist.gov)

- Project Team 9: Data Processing Awareness (*CM.AW-P*)
- Project Team 10: Monitoring and Review (*GV.MT-P*)
- Project Team 11: Disassociated Processing (*CT.DP-P*)



# **PROJECT TEAM UPDATES**

# Project Team 6: Risk Management Strategy (GV.RM-P)

## Co-Leads



**Dana Garbo**  
Chief Privacy Officer,  
Medline Industries



**James Koons**  
Founding Partner, Data Privacy  
& Security Advisors



# Project Team 6:

## Work Assignment

### Function: 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.

**Category: Risk Management Strategy (GV.RM-P):** The organization's priorities, constraints, risk tolerances, and assumptions are established and used to support operational risk decisions.

Subcategory	Description
GV.RM-P1	Risk management processes are established, managed, and agreed to by organizational stakeholders.
GV.RM-P2	Organizational risk tolerance is determined and clearly expressed.
GV.RM-P3	The organization's determination of risk tolerance is informed by its role(s) in the data processing ecosystem.



# Project Team 6: Risk Management Strategy (GV.RM-P)

## Progress Update

- **Current Status**

- Completed pre-drafting TKS statements for GV.RM-P2-P3 (Co-Leads)
- Completed review of TKS Statements for GV.RM-P2 and sent to Co-Chairs for review.

- **Goals for this work period:**

- Continue review of TKS Statements for GV.RM-P3
- Review Co-Chair feedback for GV.RM-P2 (Co-Leads)

The Co-Leads encourage all members to continue to leave comments on the TKS Statements in the TKS Workbook between meetings.

# PT6: Risk Management Strategy (GV.RM-P) Meeting Schedule

Next Meeting:  
**Thursday, October 19, 2023**  
**1:00 PM – 2:00 PM EDT**



PT6 (GV.RM-P): [PrivacyWorkforcePT6+subscribe@list.nist.gov](mailto:PrivacyWorkforcePT6+subscribe@list.nist.gov)

# Project Team 7: Awareness and Training (GV.AT-P)

## Co-Leads



**Jacqueline Crawley**  
VP of Governance,  
ISACA Atlanta



**Ivy Orecchio**  
Cybersecurity and Privacy  
Services Manager, Venable  
LLP



**Dr. Elif Kiesow Cortez**  
Research Fellow,  
Stanford Law School

# Project Team 7: Awareness and Training (GV.AT-P)

## Work Assignment

### Function: 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.

**Privacy Framework Category – Awareness and Training (GV.AT-P):** The organization's workforce and third parties engaged in data processing are provided privacy awareness education and are trained to perform their privacy-related duties and responsibilities consistent with related policies, processes, procedures, and agreements and organizational privacy values.

Subcategory	Description
GV.AT-P1	The workforce is informed and trained on its roles and responsibilities.
GV.AT-P2	Senior executives understand their roles and responsibilities.
GV.AT-P3	Privacy personnel understand their roles and responsibilities.
GV.AT-P4	Third parties (e.g., service providers, customers, partners) understand their roles and responsibilities.

# Project Team 7: Awareness and Training (GV.AT-P)

## Progress Update

- **Current Status**

- Completed pre-drafting TKS statements for GV.AT-P2 through GV.AT-P4 (Co-Leads).
- Completed review of TKS Statements for GV.AT-P2, P3, & P4

- **Goals for this work period:**

- Complete review of Co-Chair feedback for GV.AT-P2, P3, & P4

The Co-Leads encourage all members to continue to leave comments on the TKS Statements in the TKS Workbook between meetings.

# PT7: Awareness and Training (GV.AT-P)

## Meeting Schedule

Next Meeting: **If needed**  
**Wednesday, October 18, 2023**  
**1:00 PM – 2:00 PM EDT**



# Project Team 8: Data Processing Management (CT.DM-P)



**Abhinav (Abby) Palia,**  
Sr. Research Scientist,  
AWS



**Ridwan Badmus,**  
Legal Associate & CTO,  
Oguntoye & Oguntoye LP



**Nikita Samarin,**  
Digital Safety and Privacy  
Researcher, UC Berkeley



# Project Team 8:

## Work Assignment

**Privacy Framework Function: CONTROL-P (CT-P):** Develop and implement appropriate activities to enable organizations or individuals to manage data with sufficient granularity to manage privacy risks.

**Privacy Framework Category – Data Processing Management (CT.DM-P):** Data are managed consistent with the organization’s risk strategy to protect individuals’ privacy, increase manageability, and enable the implementation of privacy principles (e.g., individual participation, data quality, data minimization).

Subcategory	Description
CT.DM-P1	Data elements can be accessed for review.
CT.DM-P2	Data elements can be accessed for transmission or disclosure.
CT.DM-P3	Data elements can be accessed for alteration.
CT.DM-P4	Data elements can be accessed for deletion.
CT.DM-P5	Data are destroyed according to policy.
CT.DM-P6	Data are transmitted using standardized formats.
CT.DM-P7	Mechanisms for transmitting processing permissions and related data values with data elements are established and in place.
CT.DM-P8	Audit/log records are determined, documented, implemented, and reviewed in accordance with policy and incorporating the principle of data minimization.
CT.DM-P9	Technical measures implemented to manage data processing are tested and assessed.
CT.DM-P10	Stakeholder privacy preferences are included in algorithmic design objectives and outputs are evaluated against these preferences.



# Project Team 8: Data Processing Management (CT.DM-P)

## Progress Update

- **Current Status**

- PT8 plans to leverage work done for CT.DM-P1 in the subsequent Subcategories CT.DM-P2 through CT.DM-P4.
- Completed review of TKS statements for CT.DM-P5 and sent to PWWG Co-Chairs for review.

- **Goals for this work period:**

- PT8 will begin reviewing TKS Statements for CT.DM-P6.
- Co-Leads will continue pre-drafting TKS statements for CT.DM-P6 through CT.DM-P10.

The Co-Leads encourage all members to continue to leave comments on the TKS Statements in the TKS Workbook between meetings.

# PT8: Data Processing Management (CT.DM-P) Meeting Schedule

Next Meeting:  
**Thursday, October 12, 2023**  
**11:00 AM – 12:00 PM EDT**



**Q&A**



**NEXT STEPS**

# Next Steps

## Upcoming Meetings

Project Team 6: Risk Management Strategy (GV.RM-P)

Next Meeting: **Thursday, October 19 | 1:00 p.m. – 2:00 p.m. ET**

Project Team 7: Awareness and Training (GV.AT-P)

Next Meeting: **As needed**

Project Team 8: Data Processing Management (CT.DM-P)

Next Meeting: **Thursday, October 12, 2023 | 12:00 p.m. - 1:00 p.m. ET**

NIST Privacy Workforce Public Working Group

**Wednesday, November 8, 2023 | 1:00pm – 2:00pm ET**

\* For updated meeting schedules see the [Privacy Workforce Public Working Group | NIST](#) web page.

# Next Steps

## Mailing List Sign-up

- Privacy Workforce Working Group (PWWG): [PrivacyWorkforceWG+subscribe@list.nist.gov](mailto:PrivacyWorkforceWG+subscribe@list.nist.gov)
- PT6 (GV.RM-P): [PrivacyWorkforcePT6+subscribe@list.nist.gov](mailto:PrivacyWorkforcePT6+subscribe@list.nist.gov)
- PT7 (GV.AT-P): [PrivacyWorkforcePT7+subscribe@list.nist.gov](mailto:PrivacyWorkforcePT7+subscribe@list.nist.gov)
- PT8 (CT.DM-P): [PrivacyWorkforcePT8+subscribe@list.nist.gov](mailto:PrivacyWorkforcePT8+subscribe@list.nist.gov)
- **All mailing lists are moderated**

# Next Steps

## Troubleshooting

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