

National Institute of Standards and Technology

Request for Information

Developing a Privacy Framework

Prepared for:
Katie MacFarland

Prepared by:



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CAGE Code: 382Y3, DUNS: 196117449

Business Size: Small Disadvantaged Business;
Service-Disabled Veteran-Owned Small Business (CVE)

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Subject: Request for Information (RFI) For NIST Developing a Privacy Framework

To: Ms. Katie MacFarland,

In response to the Request for Information (RFI) For NIST Developing a Privacy Framework, our firm as addressed questions 1 and 5 below.

- 1. The greatest challenges in improving organizations' privacy protections for individuals;

Many organizations do not have an understanding of the different data types utilized by the end users within their organization, received from outside customer systems and residing within their on-premise and cloud systems. One of the greatest challenges in improving an organizations' privacy protections for individual is a lack of training of individuals to better the certain types of data that require additional protection mechanisms. Business System Owners and Information Owners are the key individuals that will need to understand that when dealing with data that could have an impact on customers and personnel, that the data requires extra security layers.

- 5. Current policies and procedures for managing privacy risk;

Policies and procedures for managing privacy risks have existed at organizations that the company has supported. Most organizations do not have a single Privacy department responsible for managing and disseminating current privacy policies and procedures. At some agencies where there is a Privacy Office that is in place, these organizations that we are familiar with do not have an understanding of the Federal policies and the NIST 800-53 Privacy Control Families for ensuring privacy requirements are met for the agency's information residing in their information systems. Guidance should be created requiring an agency to have a general agency Privacy point of contact for overseeing the agency's current compliance with Federal and NIST privacy policies and procedures for handling and managing privacy risks. Without this oversight and a central point of contract to provide proper direction and instruction, it is hard for organizations to know how to implement current privacy policies and procedures to manage privacy risks throughout the organization. While it is up to the organizations to create these policies and procedures, it is important to have this as a requirement with guidance given on how to fulfill it.

NuCrest is a Certified Veteran Enterprise (CVE) Service-Disabled Veteran-Owned Small Business (SDVOSB), Small Disadvantaged Business (SDB) and Maryland (MD) Disadvantaged Business Enterprise (DBE) certified firm located in the Washington DC metro area. Our website is www.nucrest.com

If you require additional information or have questions, please do not hesitate to contact me at 703-375-9308 or via email at michael.adams@nucrest.com.

Respectfully,

A handwritten signature in black ink that reads "Michael A. Adams".

Michael A. Adams
President/CEO
NuCrest, LLC