

NIST PRIVACY WORKFORCE PUBLIC WORKING GROUP (PWWG)

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

MEETING MINUTES

Wednesday, February 9, 2022

1:00 P.M. ET – 2:00 P.M. ET

I. INTRODUCTION

The (10th) meeting of the National Institute of Standards and Technology (NIST) Privacy Workforce Public Working Group (PWWG) convened on Wednesday, February 9, 2022 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 the update of the and NIST PWWG Project Team 4, PWWG Co-Chair Review of Task, Knowledge, and Skill (TKS) Statements, and Project Team updates from Project Team 1: Risk Assessment (ID.RA-P), Project Team 2: Inventory and Mapping (ID.IM-P), and Project Team 3: Policies, Processes, And Procedures (GV.PO-P, CT.PO-P, and CM.PO-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. NIST PWWG PROJECT TEAM 2: INVENTORY AND MAPPING (ID.IM-P)

Project Team 2 has almost completed and finalized their TKS Statements for all their Subcategories and Category. Once Project Team 2 is completed, Project Team 4 will commence shortly thereafter.

B. NIST PRIVACY FRAMEWORK AND PWWG TKS MAPPING

The NIST Team is currently developing a strategy to document and map completed TKS Statements to Privacy Framework Core Categories and Subcategories. The PWWG membership will have read-only access to this TKS mapping via the shared Google Drive to view the final TKS Statements submitted by Project Teams.

When all Project Teams have completed their work, the PWWG membership will be provided with an opportunity to review the complete set of PWWG TKS Statements (i.e., all Categories) and provide comments and/or feedback.

C. NIST PWWG PROJECT TEAM 3: POLICIES, PROCESSES, AND PROCEDURES (GV.PO-P, CT.PO-P, and CM.PO-P)

Project Team 3 Co-Leads have completed their Project Team Lead Orientation and held their first Project Team meeting during the week of January 31, 2022. Their first meeting consisted of the Project Team Orientation and they will now start to develop TKS Statements for their Privacy Framework Subcategories.

D. NIST PWWG PROJECT TEAM 4: DATA PROCESSING ECOSYSTEM RISK MANAGEMENT (ID.DE-P)

Dylan thanked those members who volunteered to participate as a Team Leads and advised that the selection of the Team Leads by the PWWG Co-Chairs will be reviewed on February 10, 2022. The Project Team 4 Co-Leads will be announced on the PWWG Monthly Meeting on March 9, 2022. The Project Team 4 Mailing List is currently open for those interested in participating. The first Project Team 4 meeting is tentatively scheduled for the week of March 7, 2022.

E. PWWG CO-CHAIRS TASK, KNOWLEDGE, AND SKILL (TKS) STATEMENT REVIEW UPDATE

Dylan provided a general overview of the development of the TKS Statements review and process. Currently, the PWWG Co-Chairs are reviewing Project Team 1 TKS Statements for ID.RA-P1, ID.RA-P2, and ID.RA-P3. The next PWWG Co-Chairs review is planned for February 24, 2022.

III. PROJECT TEAM UPDATES

A. UPDATE OF PROJECT TEAM 1: RISK ASSESSMENT (ID.RA-P) ACTIVITIES

Project Team Co-Lead Lisa McKee, Senior Manager Security and Data Privacy, Protiviti, provided a brief background and status update of the Project Team 1: Risk Assessment (ID.RA-P) Task, Knowledge, and Skill (TKS) Statements. Project Team Co-Lead Lauren Jones, Privacy Counsel, Surescripts, LLC, was not present during this call.

For reference purposes, the Team is tasked with the development of the TKS Statements for five (5) Subcategories from the NIST Privacy Framework Core V1¹.

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

- **Risk Assessment (ID.RA-P):** The organization understands the privacy risks to individuals and how such privacy risks may create follow-on impacts on organizational operations, including mission, functions, other risk management priorities (e.g., compliance, financial), reputation, workforce, and culture.
 - **ID.RA-P1:** Contextual factors related to the systems/products/services and the data actions are identified (e.g., individuals' demographics and privacy interests or perceptions, data sensitivity and/or types, visibility of data processing to individuals and third parties).
 - **ID.RA-P2:** Data analytic inputs and outputs are identified and evaluated for bias.
 - **ID.RA-P3:** Potential problematic data actions and associated problems are identified.
 - **ID.RA-P4:** Problematic data actions, likelihoods, and impacts are used to determine and prioritize risk.
 - **ID.RA-P5:** Risk responses are identified, prioritized, and implemented.

Project Team Co-Lead Lisa McKee noted that Project Team 1 has completed their goals for January 2022, by submitting their TKS Statements for ID.RA-P1, ID.RA-P2, and ID.RA-P3. The Project Team Co-Leads will meet with the PWWG Co-Chairs during their February call to review and finalize their TKS Statements for the first (3) Subcategories.

Currently, the Project Team will continue to discuss and finalize their TKS Statements for

¹ [NIST Privacy Framework Core](#)

Subcategories ID.RA-P4 and ID.RA-P5 for review by the PWWG Co-Chairs. The Project Team estimates their completion of the TKS Statements by March 2022.

The Project Team Co-Lead, Lisa McKee discussed the challenges and lessons learned within the Project Team throughout their development of TKS Statements. Some of the areas discussed were about the meeting schedule (i.e., morning meetings vs evening meetings, etc.), consistency of member participation, and challenging topics such as bias and contextual factors.

The Project Team Co-Lead, Lisa McKee also thanked the members for their participation and progress in the development of the TKS Statements. The Project Team Co-Leads encouraged the expertise and perspectives of the NIST PWWG Membership to participate in the new Project Teams 3 and 4. To join the NIST PWWG Project Team 3 or Project Team 4 Mailing List, please see the Join Mailing List section under Section V. Next Steps and Upcoming Meetings.

B. UPDATE OF PROJECT TEAM 2: INVENTORY AND MAPPING (ID.IM-P) ACTIVITIES

Project Team Co-Lead, Dr. Sarah Lewis Cortes, Privacy Engineering, Netflix, and Mary Potter, Director of Privacy and Research Data Protections, Virginia Tech, provided a brief background and status of Project Team 2: Inventory and Mapping (ID.IM-P) Task, Knowledge, and Skill (TKS) Statements.

For reference purposes, the team is tasked with the development of the Task, Knowledge, and Skill (TKS) Statements for eight (8) Subcategories from the NIST Privacy Framework Core V1.

- **IDENTIFY-P (ID-P):** Develop the organizational understanding to manage privacy risk for individuals arising from data processing.
 - **Inventory and Mapping (ID.IM-P):** Data processing by systems, products, or services is understood and informs the management of privacy risk.
 - **ID.IM-P1:** Systems/products/services that process data are inventoried.
 - **ID.IM-P2:** Owners or operators (e.g., the organization or third parties such as service providers, partners, customers, and developers) and their roles with respect to the systems/products/services and components (e.g., internal, or external) that process data are inventoried.
 - **ID.IM-P3:** Categories of individuals (e.g., customers, employees or prospective employees, consumers) whose data are being processed are inventoried.
 - **ID.IM-P4:** Data actions of the systems/products/services are inventoried.
 - **ID.IM-P5:** The purposes for the data actions are inventoried.
 - **ID.IM-P6:** Data elements within the data actions are inventoried.
 - **ID.IM-P7:** The data processing environment is identified (e.g., geographic location, internal, cloud, third parties).
 - **ID.IM-P8:** Data processing is mapped, illustrating the data actions and associated data elements for systems/products/services, including components; roles of the component owners/operators; and interactions of individuals or third parties with the systems/products/services.

Project Team Co-Lead, Mary Potter, discussed an overview of the Teams activities for January 2022. The Project Team completed and submitted all Subcategories for Inventory and Mapping (ID.IM-P1 through ID.IM-P8) to the PWWG Co-Chairs for review.

The Project Team is currently reviewing and finalizing the feedback from the Co-Chairs for ID.IM-P7 and ID.IM-P8. The Project Team has also submitted their suggestions for overall baseline TKS Statements for the NIST Privacy Framework, the Identify-P Function, and the Inventory and Mapping (ID.IM-P) Category and will continue to refine TKS Statements for the Inventory and Mapping (ID.IM-P) Category.

The Project Team Co-Lead, Sarah Cortes discussed the challenges and lessons learned within the Project Team throughout their development of TKS Statements. The Project Team discussed various topics of interest such as having an iterative TKS Statement review process, Subcategory verbiage regarding identify and inventory Tasks, and proposed baseline TKS Statements for the Privacy Framework, Function, and Category to avoid repetition in Subcategories.

The Project Team will continue to discuss and refine their current TKS Statements in coordination with the PWWG Co-Chairs review and feedback to present final TKS Statements. The Project Team 2 Meeting scheduled for February 21, 2022 will be cancelled and the team will resume on Monday, February 28, 2022 at 12:00 P.M EST.

The Project Team Co-Leads noted that the group is no longer accepting new members and encouraged the expertise and perspectives of the NIST PWWG Membership to participate in the new Project Teams 3 and 4. To join the NIST PWWG Project Team 3 or Project Team 4 Mailing List, please see the Join Mailing List section under Section V. Next Steps and Upcoming Meetings.

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

Project Team Co-Leads, Amin Ali, GRC Program Manager & Cybersecurity PMO Lead, Motorola Solutions, Dan LoPresto, Director of Privacy Compliance, University of Central Florida, and Nandita Narla, Senior Privacy Program Manager for Privacy, provided a brief background and status of Project Team 3: Policies, Processes, and Procedures (GV.PO-P, CT.PO-P, and CM.PO-P) Task, Knowledge, and Skill (TKS) Statements.

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 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: Dan LoPresto provided a brief update of Project Team 3 kick-off meeting. The first meeting was held on January 31, 2022. The Project Team Co-Leads surveyed and discussed the proposed meeting schedule and determined bi-weekly meetings to be held on Thursdays at 10:00 AM PST/ 1:00 PM EST.

The Project Team Co-Leads encouraged Project Team members to review the PWWG Reference documents to understand the goals and expectations of the Project Team and the NIST PWWG. Project Team 3 will begin to develop TKS Statements during their next meeting. The next Project Team 3 meeting is scheduled for February 17, 2022 at 1:00 PM EST.

The Project Team Co-Leads encouraged 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 V. Next Steps and Upcoming Meetings.

IV. Q & A

N/A

V. NEXT STEPS & UPCOMING MEETINGS

A. NEXT STEPS

- Project Team 1 and Project Team 2 will continue to review, refine, and finalize TKS Statements and submit to the Co-Chairs for review and finalization.
- Project Team 3 will begin developing TKS Statements.
- NIST will start to commence Project Team 4: Data Processing Ecosystem Risk Management (ID.DE-P)
- NIST will continue to develop the Privacy Framework and PWWG TKS Statement Mapping.
- The Co-Chairs will select the Project Team 4 Co-Leads and provide an announcement during the March PWWG Monthly meeting.
- 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.

B. 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.

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

- Wednesday, February 16, 2022 | 5:00pm ET - 6:00pm ET

2) Project Team 2: Inventory and Mapping (ID.IM-P)

- Monday, February 28, 2022 | 12:00pm ET – 1:00pm ET

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

- Thursday, February 17, 2022 | 1:00pm ET – 2:00pm ET

4) NIST Privacy Workforce Public Working Group (PWWG)

The NIST PWWG Monthly Meeting is the 2nd Wednesday of each month. Meeting dates, minutes, and slides are located on the [NIST Privacy Workforce Working Group](#) website.

- Wednesday, March 9, 2022 | 1:00pm ET – 2:00pm ET

* For updated meeting schedules see the PWWG web page.

C. 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 1 (PT1): PrivacyWorkforcePT1+subscribe@list.nist.gov
 - Project Team 2 (PT2): PrivacyWorkforcePT2+subscribe@list.nist.gov
 - Project Team 3 (PT3): PrivacyWorkforcePT3+subscribe@list.nist.gov
 - Project Team 4 (PT4): PrivacyWorkforcePT4+subscribe@list.nist.gov

D. 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