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Department of Defense  
OFFICE OF PREPUBLICATION AND SECURITY REVIEW

# The Efficacy of a Privacy Program Plan

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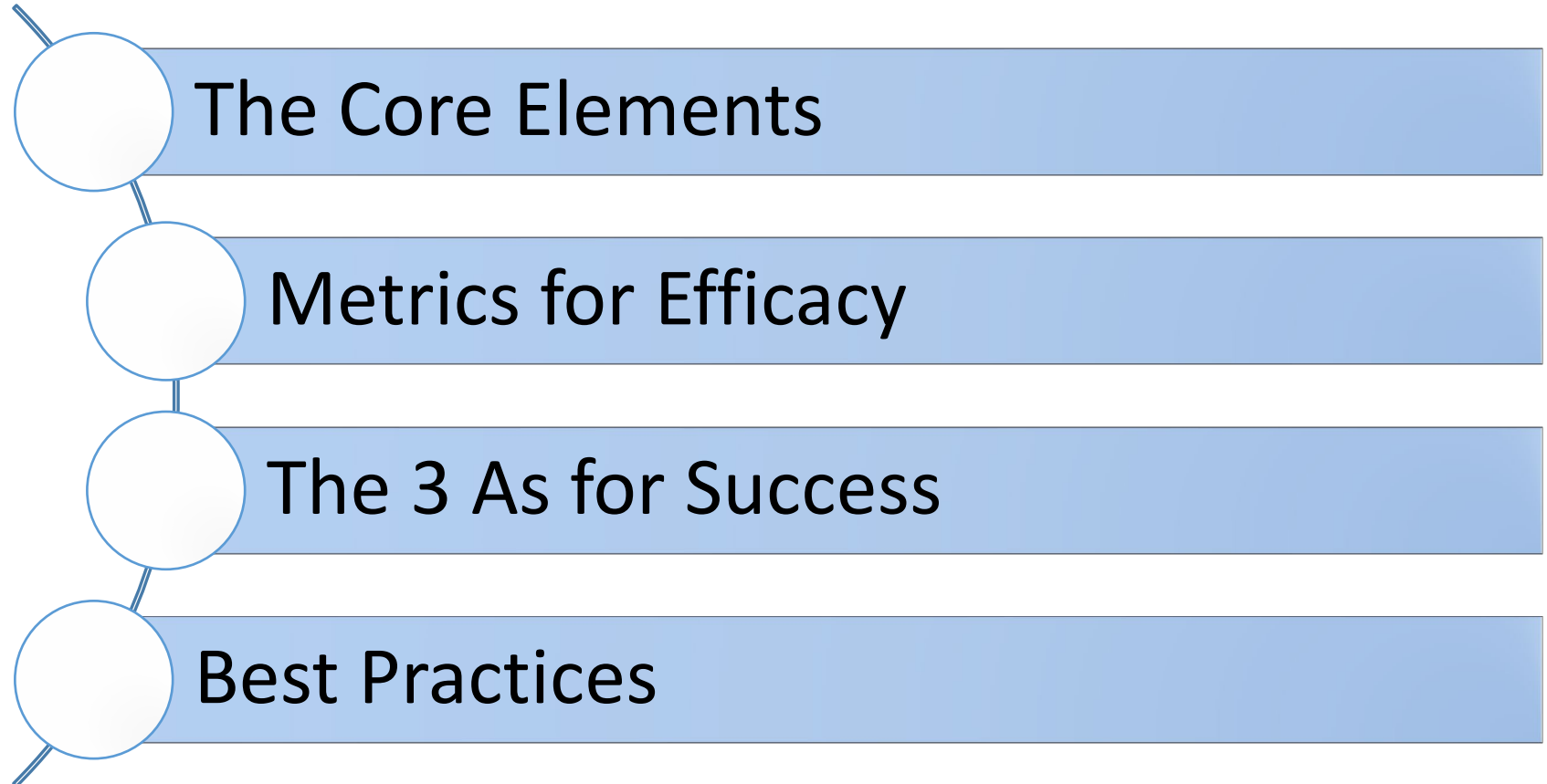
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**PRIVACY, CIVIL LIBERTIES, AND FREEDOM OF INFORMATION DIRECTORATE**  
Office of the Assistant to the Secretary of Defense for Privacy, Civil Liberties, and Transparency

# Discussion Topics

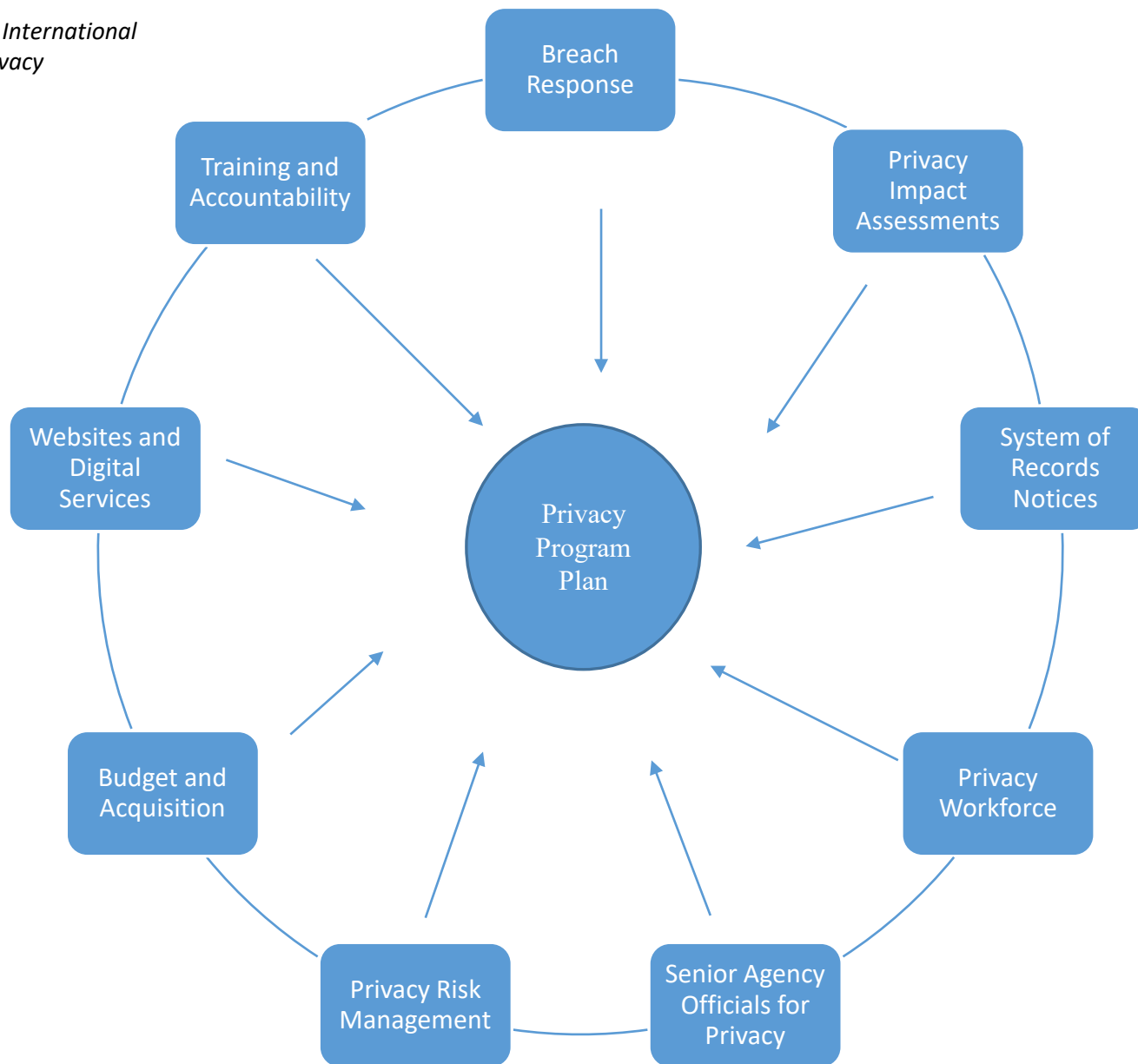
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# Privacy Program Plan

- **OMB Circular A-130** requires that all federal agencies: (a) consider and protect an individual's privacy throughout the information lifecycle; **(b) develop and implement an agency-wide privacy program that includes people, processes, and technology;** (c) ensure compliance with applicable privacy requirements regarding the creation, collection, use, processing, storage, maintenance, dissemination, disclosure, and disposal of personally identifiable information (PII); (d) comply with all applicable privacy laws, including Privacy Act requirements; and (e) evaluate policies that impact privacy; and (f) manage privacy risks

*As defined by the International  
Association of Privacy  
Professionals*



# Effectiveness

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EXAMPLES TO MEASURE & EVALUATE SUCCESS

# Measures of Success

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- Routine Compliance Audits
- Privacy Impact Assessments
- Breach Metrics
- Individual Rights
- Policies and Implementing Procedures

- Training and Awareness
- Accountability
- Privacy Risk Management Strategy
- Investment
- Feedback

# Metrics for Individual Rights

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- **Breach Response and Prevention Program**

- How many breaches?
- What types of breaches occur?
- How many people are impacted by these recurring breaches?
- What follow-up actions are taken in response to breaches?
  - Are policies and procedures current?
  - Is there enough communication with the workforce to mitigate recurring breach types?
  - Are there effective measures in place at the organization level to mitigate risk and implement technology solutions?

- **Record Requests**

- Number of record requests received and average turn around time?
- What identity verification measures are in place prior to record releases?
- Are consent forms readily available to requestors?
- Are denials properly communicated?
- Do individuals understand the process?

# Metrics for Training & Awareness

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- **Privacy Training**

- How many trainings are offered?
- What is the percentage of participation by the workforce?
- Is there role-based training?
- Is privacy training mandatory?
- Is privacy training a critical element in your performance work plans?
- Do you offer workshops or focused training sessions on privacy compliance?

- **Awareness**

- How many privacy outreach events are offered?
- Do you solicit stakeholder feedback?
- Do you provide a forum for information sharing and collaboration?
- What is the staff engagement rate with your privacy program?
- Is Senior Leadership invested in the privacy program?
  - Is there appropriate budgeting, staffing, resources, technology to support compliance and success?



# The 3 As to a Successful Privacy Program

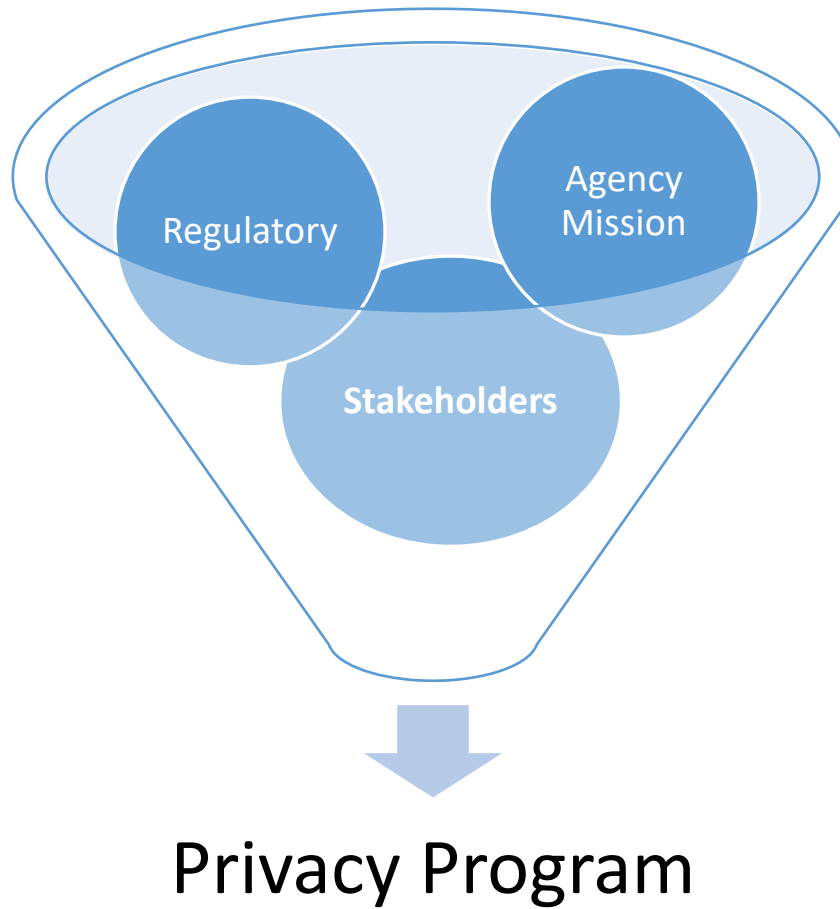
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- ALIGNMENT
- ACCOUNTABILITY
- ADAPTABILITY



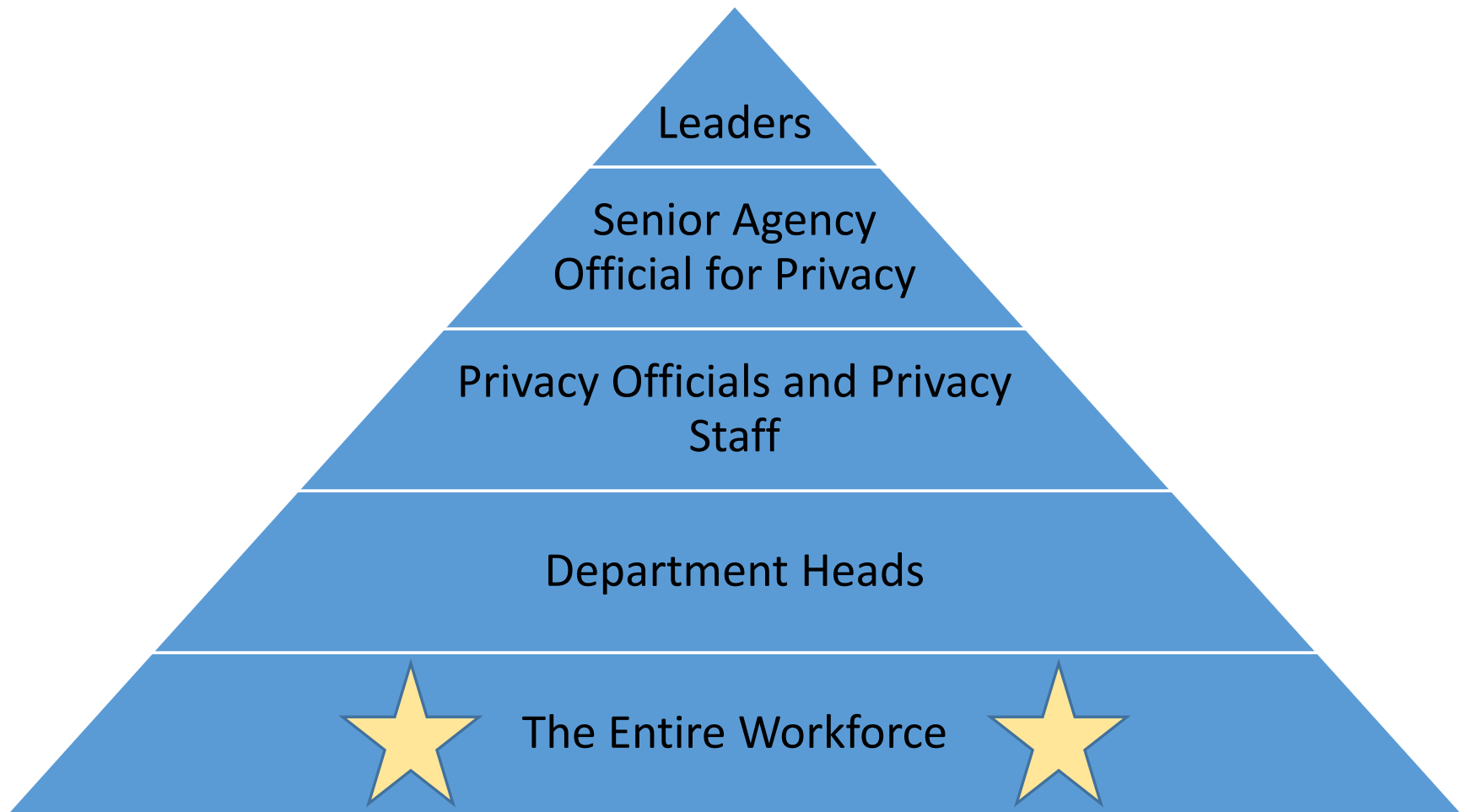
# Alignment

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# Accountability

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# Adaptability

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MIKE TYSON INFAMOUSLY SAID: “EVERYBODY HAS A PLAN UNTIL THEY GET PUNCHED IN THE FACE.”

# The Importance of Adaptability

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- Emerging technologies
- Commercially available information
- Publicly available information
- New laws and regulations
- New Privacy controls and overlays
- New vendors
- Growing mission space
- Artificial Intelligence
- New identity proofing and authentication requirements
- Cloud-based environments
- And the list goes on...



The Privacy landscape is constantly changing!!



# Best Practices

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- Review the Plan regularly
- Understanding its an iterative plan
- Conduct internal audits
- Define privacy metrics
- Identify gaps and develop compliance workplans and strategy documents
- Communicate the PPP with the workforce
- Build relationships with stakeholders
- AND...

**MOST  
IMPORTANTLY:**

**CREATE A  
PRIVACY  
AWARE  
CULTURE  
& WORKFORCE**



# QUESTIONS

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Thank You!

*Contact Info:*

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