

CAREER PATHWAY PRIVACY OFFICER / PRIVACY COMPLIANCE MANAGER (732)

January 2021

CLEARED
For Open Publication

4
Apr 07, 2021

Department of Defense
OFFICE OF PREPUBLICATION AND SECURITY REVIEW

Developed By:

The Interagency
Federal Cyber Career
Pathways Working
Group

Endorsed By:



Table of Contents

CAREER PATHWAY PRIVACY OFFICER / PRIVACY COMPLIANCE MANAGER (732) 1

1 732-PRIVACY OFFICER / PRIVACY COMPLIANCE MANAGER 3

1.1 Work Role Overview 3

1.2 Core Tasks..... 6

1.3 Core Knowledge, Skills, and Abilities 10

1.4 Core Competencies..... 12

1.5 Suggested Qualifications / Capability Indicators 13

1 732-PRIVACY OFFICER / PRIVACY COMPLIANCE MANAGER

1.1 WORK ROLE OVERVIEW

The table below provides an overview of various role-specific elements related to 732- Privacy Officer / Privacy Compliance Officer.

Table 1. 732-Privacy Officer / Privacy Compliance Manager Work Role Overview

NICE Role Description	Develops and oversees privacy compliance program and privacy program staff, supporting privacy compliance, governance/policy, and incident response needs of privacy and security executives and their teams.
OPM Occupational Series	<p>Personnel performing the 732-Privacy Officer / Privacy Compliance Manager work role are most commonly aligned to the following Occupational Series (Top 5 Shown):</p> <ul style="list-style-type: none"> - 2210-Information Technology Management – 29% - 306-Government Information Specialist – 23% - 905-General Attorney – 16% - 301-Miscellaneous Administration and Program – 8% - 343-Management and Program and Analysis – 6%
Work Role Pairings	<p>Personnel performing the 732 Privacy Officer / Privacy Compliance Officer- work role are most commonly paired with the following complimentary Work Roles (Top 5 shown):</p> <ul style="list-style-type: none"> - 752-Cyber Policy and Strategy Planner – 20% - 731-Cyber Legal Advisor – 14% - 431-Knowledge Manager – 12% - 422-Data Analyst – 6% - 461-Systems Security Analyst – 6%
Functional Titles	<p>Personnel performing the 732-Privacy Officer / Privacy Compliance Manager work role may unofficially or alternatively be called:</p> <ul style="list-style-type: none"> - Archivist - Chief Privacy Officer - Compliance and Privacy Specialist - Freedom of Information Act (FOIA) Official - Government Information Specialist - Government Information Specialist - Privacy Act Officer - Privacy Compliance Manager - Privacy Manager

	<ul style="list-style-type: none"> - Privacy Policy Analyst - Privacy Specialist - Records and Information Management Specialist
<p style="text-align: center;">Distribution of GS-Levels</p>	<p>Personnel performing the 732-Privacy Officer / Privacy Compliance Manager work role are most commonly found within the following grades on the General Schedule.*</p> <ul style="list-style-type: none"> - <input type="checkbox"/> GS-5– redacted** - <input type="checkbox"/> GS- 6 – redacted** - <input type="checkbox"/> GS-7 – redacted** - <input checked="" type="checkbox"/> GS-9 – 8% - <input checked="" type="checkbox"/> GS-11 – 6% - <input checked="" type="checkbox"/> GS-12 – 17% - <input checked="" type="checkbox"/> GS-13 – 25% - <input checked="" type="checkbox"/> GS-14 – 17% - <input checked="" type="checkbox"/> GS-15 – 11% <p>*15% of all 732s are in non-GS pay plans and excluded from this section **Percentages less than 3% have been redacted</p>
<p style="text-align: center;">On Ramps</p>	<p>The following work roles are examples of possible roles an individual may perform prior to transitioning into the 732-Privacy Officer / Privacy Compliance Manager work role:</p> <ul style="list-style-type: none"> - 411-Technical Support Specialist - 421-Database Administrator - 422-Data Analyst - 431-Knowledge Manager - 441-Network Operations Specialist - 451-System Administrator - 461-Systems Security Analyst - 531-Cyber Defense Incident Responder - 612-Security Control Assessor - 621-Software Developer - 641-Systems Requirements Planner - 661-Research and Development Specialist - 671-System Testing and Evaluation Specialist - 722-Information Systems Security Manager (ISSM) - 731-Cyber Legal Advisor - 752-Cyber Policy and Strategy Planner - 802-IT Project Manager - 803-Product Support Manager - 805-IT Program Auditor

Off Ramps	<p>The following work roles are examples of common transitions an individual may pursue after having performed the 732-Privacy Officer / Privacy Compliance Manager work role. This is not an exhaustive list, nor does it consider learning and development opportunities an individual may pursue to prepare themselves for performing alternate work roles:</p> <ul style="list-style-type: none">- 711-Cyber Instructional Curriculum Developer- 712-Cyber Instructor- 722-Information Systems Security Manager (ISSM)- 751-Cyber Workforce Developer and Manager- 752-Cyber Policy and Strategy Planner- 802-IT Project Manager

1.2 CORE TASKS

The table below provides a list of tasks that represent the Core, or baseline, expectations for performance in the 732- Privacy Officer / Privacy Compliance Officer work role, as well as additional tasks that those in this role may be expected to perform.

Table 2. 732-Privacy Officer / Privacy Compliance Manager Core Tasks

Task ID	Task Description	Core or Additional
T0003	Advise senior management (e.g., Chief Information Officer [CIO]) on risk levels and security posture.	Core
T0131	Interpret and apply laws, regulations, policies, standards, or procedures to specific issues.	Core
T0004	Advise senior management (e.g., CIO) on cost/benefit analysis of information security programs, policies, processes, systems, and elements.	Core
T0032	Conduct Privacy Impact Assessments (PIAs) of the application's security design for the appropriate security controls, which protect the confidentiality and integrity of Personally Identifiable Information (PII).	Core
T0098	Evaluate contracts to ensure compliance with funding, legal, and program requirements.	Core
T0133	Interpret patterns of noncompliance to determine their impact on levels of risk and/or overall effectiveness of the enterprise's cybersecurity program.	Core
T0188	Prepare audit reports that identify technical and procedural findings and provide recommended remediation strategies/solutions.	Core
T0381	Present technical information to technical and nontechnical audiences.	Core
T0384	Promote awareness of cyber policy and strategy as appropriate among management and ensure sound principles are reflected in the organization's mission, vision, and goals.	Core
T0478	Provide guidance on laws, regulations, policies, standards, or procedures to management, personnel, or clients.	Core
T0861	Work with the general counsel, external affairs and businesses to ensure both existing and new services comply with privacy and data security obligations.	Core
T0862	Work with legal counsel and management, key departments and committees to ensure the organization has and maintains appropriate privacy and confidentiality consent, authorization forms and information notices and materials reflecting current organization and legal practices and requirements.	Core
T0863	Coordinate with the appropriate regulating bodies to ensure that programs, policies and procedures involving civil rights, civil liberties and privacy considerations are addressed in an integrated and comprehensive manner.	Core
T0866	Maintain current knowledge of applicable federal and state privacy laws and accreditation standards and monitor advancements in information privacy technologies to ensure organizational adaptation and compliance.	Core
T0867	Ensure all processing and/or databases are registered with the local privacy/data protection authorities where required.	Core
T0868	Work with business teams and senior management to ensure awareness of "best practices" on privacy and data security issues.	Core

Task ID	Task Description	Core or Additional
T0869	Work with organization senior management to establish an organization-wide Privacy Oversight Committee	Core
T0870	Serve in a leadership role for Privacy Oversight Committee activities	Core
T0871	Collaborate on cyber privacy and security policies and procedures	Core
T0872	Collaborate with cybersecurity personnel on the security risk assessment process to address privacy compliance and risk mitigation	Core
T0873	Interface with Senior Management to develop strategic plans for the collection, use and sharing of information in a manner that maximizes its value while complying with applicable privacy regulations	Core
T0874	Provide strategic guidance to corporate officers regarding information resources and technology	Core
T0875	Assist the Security Officer with the development and implementation of an information infrastructure	Core
T0876	Coordinate with the Corporate Compliance Officer regarding procedures for documenting and reporting self-disclosures of any evidence of privacy violations.	Core
T0877	Work cooperatively with applicable organization units in overseeing consumer information access rights	Core
T0878	Serve as the information privacy liaison for users of technology systems	Core
T0879	Act as a liaison to the information systems department	Core
T0880	Develop privacy training materials and other communications to increase employee understanding of company privacy policies, data handling practices and procedures and legal obligations	Core
T0881	Oversee, direct, deliver or ensure delivery of initial privacy training and orientation to all employees, volunteers, contractors, alliances, business associates and other appropriate third parties	Core
T0882	Conduct on-going privacy training and awareness activities	Core
T0883	Work with external affairs to develop relationships with consumer organizations and other NGOs with an interest in privacy and data security issues—and to manage company participation in public events related to privacy and data security	Core
T0884	Work with organization administration, legal counsel and other related parties to represent the organization's information privacy interests with external parties, including government bodies, which undertake to adopt or amend privacy legislation, regulation or standard.	Core
T0885	Report on a periodic basis regarding the status of the privacy program to the Board, CEO or other responsible individual or committee	Core
T0886	Work with External Affairs to respond to press and other inquiries regarding concern over consumer and employee data	Core
T0887	Provide leadership for the organization's privacy program	Core
T0888	Direct and oversee privacy specialists and coordinate privacy and data security programs with senior executives globally to ensure consistency across the organization	Core
T0889	Ensure compliance with privacy practices and consistent application of sanctions for failure to comply with privacy policies for all individuals in the organization's workforce, extended workforce and for all business associates in cooperation with	Core

Task ID	Task Description	Core or Additional
	Human Resources, the information security officer, administration and legal counsel as applicable	
T0890	Develop appropriate sanctions for failure to comply with the corporate privacy policies and procedures	Core
T0891	Resolve allegations of noncompliance with the corporate privacy policies or notice of information practices	Core
T0892	Develop and coordinate a risk management and compliance framework for privacy	Core
T0893	Undertake a comprehensive review of the company's data and privacy projects and ensure that they are consistent with corporate privacy and data security goals and policies.	Core
T0894	Develop and manage enterprise-wide procedures to ensure the development of new products and services is consistent with company privacy policies and legal obligations	Core
T0895	Establish a process for receiving, documenting, tracking, investigating and acting on all complaints concerning the organization's privacy policies and procedures	Core
T0896	Establish with management and operations a mechanism to track access to protected health information, within the purview of the organization and as required by law and to allow qualified individuals to review or receive a report on such activity	Core
T0897	Provide leadership in the planning, design and evaluation of privacy and security related projects	Core
T0899	Periodically revise the privacy program considering changes in laws, regulatory or company policy	Core
T0900	Provide development guidance and assist in the identification, implementation and maintenance of organization information privacy policies and procedures in coordination with organization management and administration and legal counsel	Core
T0901	Assure that the use of technologies maintains, and does not erode, privacy protections on use, collection and disclosure of personal information	Core
T0902	Monitor systems development and operations for security and privacy compliance	Core
T0903	Conduct privacy impact assessments of proposed rules on the privacy of personal information, including the type of personal information collected and the number of people affected	Core
T0904	Conduct periodic information privacy impact assessments and ongoing compliance monitoring activities in coordination with the organization's other compliance and operational assessment functions	Core
T0905	Review all system-related information security plans to ensure alignment between security and privacy practices	Core
T0906	Work with all organization personnel involved with any aspect of release of protected information to ensure coordination with the organization's policies, procedures and legal requirements	Core
T0907	Account for and administer individual requests for release or disclosure of personal and/or protected information	Core
T0908	Develop and manage procedures for vetting and auditing vendors for compliance with the privacy and data security policies and legal requirements	Core

Task ID	Task Description	Core or Additional
T0909	Participate in the implementation and ongoing compliance monitoring of all trading partner and business associate agreements, to ensure all privacy concerns, requirements and responsibilities are addressed	Core
T0910	Act as, or work with, counsel relating to business partner contracts	Core
T0911	Mitigate effects of a use or disclosure of personal information by employees or business partners	Core
T0912	Develop and apply corrective action procedures	Core
T0913	Administer action on all complaints concerning the organization's privacy policies and procedures in coordination and collaboration with other similar functions and, when necessary, legal counsel	Core
T0914	Support the organization's privacy compliance program, working closely with the Privacy Officer, Chief Information Security Officer, and other business leaders to ensure compliance with federal and state privacy laws and regulations	Core
T0915	Identify and correct potential company compliance gaps and/or areas of risk to ensure full compliance with privacy regulations	Core
T0916	Manage privacy incidents and breaches in conjunction with the Privacy Officer, Chief Information Security Officer, legal counsel and the business units	Core
T0917	Coordinate with the Chief Information Security Officer to ensure alignment between security and privacy practices	Core
T0918	Establish, implement and maintains organization-wide policies and procedures to comply with privacy regulations	Core
T0919	Ensure that the company maintains appropriate privacy and confidentiality notices, consent and authorization forms, and materials	Core
T0066	Develop and maintain strategic plans.	Additional
T0029	Conduct functional and connectivity testing to ensure continuing operability.	Additional
T0930	Establish a risk management strategy for the organization that includes a determination of risk tolerance.	Additional
T0099	Evaluate cost/benefit, economic, and risk analysis in decision-making process.	Additional
T0864	Liaise with regulatory and accrediting bodies.	Additional
T0865	Work with external affairs to develop relationships with regulators and other government officials responsible for privacy and data security issues.	Additional
T0898	Establish an internal privacy audit program	Additional

1.3 CORE KNOWLEDGE, SKILLS, AND ABILITIES

The table below provides a ranking of KSAs that represent the Core, or baseline, expectations for performance in the 732- Privacy Officer / Privacy Compliance Officer work role, as well as additional KSAs that those in this role may be expected to demonstrate.

Table 3. 732-Privacy Officer / Privacy Compliance Manager Core KSAs

KSA ID	Description	Competency	Importance to Work Role
K0001	Knowledge of computer networking concepts and protocols, and network security methodologies.	Infrastructure Design	Foundational to all Work Roles
K0002	Knowledge of risk management processes (e.g., methods for assessing and mitigating risk).	Risk Management	Foundational to all Work Roles
K0003	Knowledge of laws, regulations, policies, and ethics as they relate to cybersecurity and privacy.	Legal, Government, and Jurisprudence	Foundational to all Work Roles
K0004	Knowledge of cybersecurity and privacy principles.	Information Systems/Network Security	Foundational to all Work Roles
K0005	Knowledge of cyber threats and vulnerabilities.	Vulnerabilities Assessment	Foundational to all Work Roles
K0006	Knowledge of specific operational impacts of cybersecurity lapses.	Vulnerabilities Assessment	Foundational to all Work Roles
K0066	Knowledge of Privacy Impact Assessments.	Data Privacy and Protection	Core
A0110	Ability to monitor advancements in information privacy laws to ensure organizational adaptation and compliance.	Data Privacy and Protection	Core
A0111	Ability to work across departments and business units to implement organization's privacy principles and programs and align privacy objectives with security objectives.	Data Privacy and Protection	Core
S0354	Skill in creating policies that reflect the business's core privacy objectives.	Data Privacy and Protection	Core
A0113	Ability to determine whether a security incident violates a privacy principle or legal standard requiring specific legal action.	Incident Management	Core
A0105	Ability to tailor technical and planning information to a customer's level of understanding.	Information Management	Core
S0356	Skill in communicating with all levels of management including Board members (e.g., interpersonal skills, approachability, effective listening skills, appropriate use of style and language for the audience).	Interpersonal Skills	Core

KSA ID	Description	Competency	Importance to Work Role
K0168	Knowledge of applicable laws, statutes (e.g., in Titles 10, 18, 32, 50 in U.S. Code), Presidential Directives, executive branch guidelines, and/or administrative/criminal legal guidelines and procedures.	Legal, Government, and Jurisprudence	Core
A0104	Ability to select the appropriate implant to achieve operational goals.	Operations Support	Core
K0613	Knowledge of who the organization's operational planners are, how and where they can be contacted, and what are their expectations.	Organizational Awareness	Core
A0034	Ability to develop, update, and/or maintain standard operating procedures (SOPs).	Policy Management	Core
K0008	Knowledge of applicable business processes and operations of customer organizations.	Requirements Analysis	Additional
A0033	Ability to develop policy, plans, and strategy in compliance with laws, regulations, policies, and standards in support of organizational cyber activities.	Risk Policy	Core
A0024	Ability to develop clear directions and instructional materials.	Teaching Others	Core
A0114	Ability to develop or procure curriculum that speaks to the topic at the appropriate level for the target.	Teaching Others	Core
A0112	Ability to monitor advancements in information privacy technologies to ensure organizational adaptation and compliance.	Technology Awareness	Core
K0614	Knowledge of wireless technologies (e.g., cellular, satellite, GSM) to include the basic structure, architecture, and design of modern wireless communications systems.	Telecommunications	Additional
K0612	Knowledge of what constitutes a "threat" to a network.	Threat Analysis	Core
S0355	Skill in negotiating vendor agreements and evaluating vendor privacy practices.	TPO (Third Party Oversight)	Additional

1.4 CORE COMPETENCIES

The table below is a compilation of competencies aligned to the 732- Privacy Officer / Privacy Compliance Officer work role, and their associated importance. Listed competencies are collections of three or more similar Knowledge, Skills, or Abilities aligned to the Work Role. *These competencies originate from the [NICE Framework Competency Pivot Tool](#).*

Table 4. 732-Privacy Officer / Privacy Compliance Manager Core Competencies

Technical Competency	Comp. ID	Definition	Work Role Related KSAs	Importance
Data Privacy and Protection	C014	KSAs that relate to the operation, management, and maintenance of network and telecommunication systems and linked systems and peripherals.	<ul style="list-style-type: none"> - Knowledge of Payment Card Industry (PCI) data security standards. - Knowledge of Personal Health Information (PHI) data security standards. - Knowledge of privacy disclosure statements based on current laws. 	Core
Legal Government and Jurisprudence	C030	KSAs that relate to laws, regulations, policies, and ethics that can impact organizational activities.	<ul style="list-style-type: none"> - Knowledge of laws, policies, procedures, or governance relevant to cybersecurity for critical infrastructures. - Knowledge of foreign disclosure policies and import/export control regulations as related to cybersecurity. 	Core
Technology Awareness	C053	KSAs that relate to keeping up to date on technological developments and making effective use of technology to achieve results	<ul style="list-style-type: none"> - Knowledge of new and emerging information technology (IT) and cybersecurity technologies. - Ability to monitor and assess the potential impact of emerging technologies on laws, regulations, and/or policies. 	Additional

1.5 SUGGESTED QUALIFICATIONS / CAPABILITY INDICATORS

Table 5. 732-Privacy Officer / Privacy Compliance Manager Suggested Qualifications

For indicators of capability for the 732-Privacy Officer / Privacy Compliance Manager work role, please see [Draft NISTR 8193 - National Initiative for Cybersecurity Education \(NICE\) Framework Work Role Capability Indicators](#).

Section to be populated with updated DoD-8140 Qualification Matrix for 732-Privacy Officer / Privacy Compliance Manager.