A Unified Model for Data Governance in Utah

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Abstract

The rising digital age has led to questions of how governmental entities should handle an individual's personal data. Previous research[1] reviewed the existing condition of data governance in Utah along with a brief overview of the structure which supports it. This white paper delves further into the structural issues related to data governance, identifying the core challenges for governmental entities.

Our research team included interviews with numerous state employees and officials, multiple workshops, and a review of state statutes to pinpoint barriers to implementing data governance.[2] In collaboration with the Utah Office of Data Privacy (ODP), the Herbert Institute convened a Data Governance Summit with participants from both the public and private sectors. We identified key areas where governmental entities experience the greatest challenges to implementing data governance.

The study findings indicate that Utah's data governance landscape suffers from disjointed implementation with governmental entities operating under inconsistent standards and outdated systems. This fragmentation has led to wasted resources, noncompliance with state laws, and erosion of public trust. Thus, governmental entities have struggled with managing records throughout their lifecycle.

To address these systemic issues, this paper introduces the Records Governance Model (RGM), designed to simplify and standardize the means in which governmental entities manage records throughout their lifecycle. The model categorizes governmental entities by their functions and services, providing structure for properly managing records while maintaining privacy, transparency, and operation efficiency.

Finally, the paper offers a set of recommendations to guide policymakers and employees in implementing the model and bringing Utah into full compliance with its data governance statutes. By adopting this unified approach, the state can strengthen accountability, protect privacy, and set a precedent for responsible data management in the digital era.

Introduction

Across Utah, governmental entities[3] have encountered recurring structural obstacles while attempting to comply with the current data-governance requirements. Many employees describe the experience as confusing, fragmented, and unsupported. During interviews, state employees consistently expressed uncertainty about how to designate, classify, retain, and share records, especially digital records and data within IT systems. One official described navigating the state's general retention schedules as "guesswork," adding, "A lot of [schedules] overlap and sometimes it's just a judgment call."[4]

Although accounts may differ in detail, they all point to the same conclusion: governmental entities are attempting to manage records without the statewide structure required for consistency and effectiveness. In the absence of clear statewide standards and processes, even routine decisions become uncertain.

Data Governance

Data governance refers to the framework that defines how information is classified, retained, shared, and used across its lifecycle. It ensures that every record is handled in accordance with law and policy while balancing privacy and transparency.[5] When applied inconsistently, agencies are forced to create their own procedures, leading to inconsistent processes and weakened accountability.

Challenges in Utah's Data Governance System

Despite legislative efforts[6] and growing awareness, Utah's data governance landscape remains inconsistent and difficult to navigate.[7] Governmental entities across the state continue to face systemic challenges across foundational areas including purpose and use, classification, appraisal and valuation, retention, and data sharing. These challenges have led to tangible consequences for efficiency, compliance, and public trust. The following three structural gaps in governance demonstrate how these challenges translate into real-world costs.

Operational and Inefficiency Cost

> Disjointed classification and retention create duplicated efforts, inefficient storage, and manual processes that unnecessarily strain public resources.[8]

Legal and Complicance Risks

> Without consistent legal standards, government entities risk noncompliance, exposing operations to penalties and undermining public confidence.[9]

Erosion of Public Trust

> When data is mishandled through weak and inconsistent data-sharing agreements, public engagement declines, undermining accountability and service delivery across the state.[10]

Moving Toward a Unified Model

These ongoing challenges reflect a system that lacks structure, consistency, and support. Without a unified model to replace today's fragmented approach, governmental entities are left to navigate complex responsibilities with limited guidance and uneven tools.

Utah's current data governance landscape is constrained by disjointed execution, outdated technology that fails to keep pace with evolving regulations, and the absence of consistent statewide standards. To address these structural gaps, the Records Governance Model provides a unified framework guided by principles that prioritize privacy, transparency, responsible use, and equal application of the law.

Records Lifecycle

Understanding how this framework functions begins with understanding the records lifecycle. Data prepared, owned, received, or retained by a governmental entity is considered a record. The term record includes "a book, letter, document, paper, map, plan, photograph, film, card, tape, recording, electronic data, or other documentary material."[11] These records should be managed according to a record series, which means "a group of records that may be treated as a unit for purposes of designation, description, management, or disposition."[12] Government entities must evaluate, designate, and classify all of their record series and then report the designation of these record series and their retention schedule to Utah State Archives.[13]

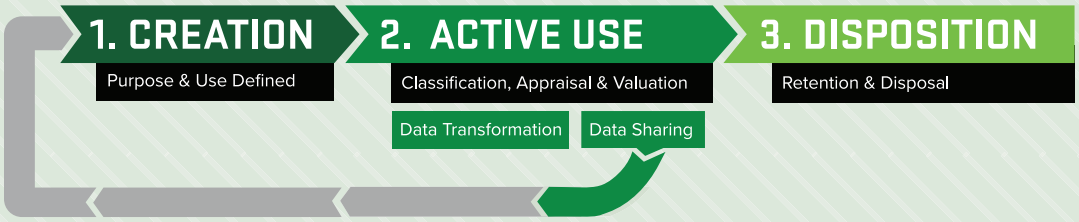
Each record follows a predictable lifecycle beginning with its creation, continuing through its active use, and ending with final disposition. A compliant lifecycle process would ensure the record is managed and used lawfully, retained appropriately, protected throughout its existence, disposed of as required, and no longer used after a disposition date has been reached.[14]

When any part in this cycle is immature or nonexistent, the entire structure becomes unstable, possibly leading to cascading failures, including legal noncompliance, privacy breaches, and operational inefficiencies.

Figure one outlines the key stages in a record's lifecycle and the governance components addressed throughout this paper. Among the lifecycle's earliest and most critical steps is defining why data are collected and how it will be used. This foundational layer directly shapes retention, classification, and downstream compliance efforts.

> "WHEN **ANY PART** IN THIS CYCLE IS **IMMATURE OR NONEXISTENT**, THE ENTIRE STRUCTURE **BECOMES UNSTABLE**"

RECORDS LIFECYCLE



Purpose & Use of Collected Data

Effective data governance requires that governmental entities establish a clear purpose and intended use for the data they collect at the point of collection. Under the Government Data Privacy Act (GDPA), governmental entities are required to provide a privacy notice when personal data is requested or collected.[15] This notice must describe why the data is collected (its purpose) and how it will be used (its intended use), and link the data to its corresponding record series.[16]

Although these determinations are not part of the record series creations process, they remain foundational for compliance.[17] When the purpose and use of collected data are clearly defined, records can be properly designated, classified, and retained in accordance with state law.

Documentation of purpose and use remains inconsistent across Utah's governmental entities. One records officer explained that without clear statewide guidance, the process of maintaining records documentation often feels procedural. As they put it, "There's no clear standard. We just copy what we used last time or guess what sounds official."[18] In many cases, generic phrases such as "program administration" or "compliance" are used, offering little direction on how records should be classified or retained.[19]

When purpose and use are unclear or unevenly applied, compliance becomes increasingly difficult. Without clear guidance, records officers are forced to rely on subjective judgment, resulting in inconsistent classifications and uncertain retention practices. These gaps undermine data security and elevate the risk of misuse.

The lack of clarity also hinders transparency as governmental entities struggle to explain what data is collected and for what purpose. Over time, this weakens public trust and increases the likelihood of both over-retention and unlawful disclosure. As several employees noted, the lack of clear use limitations leads to operational friction, legal uncertainty, and a growing perception that the system is "too complicated to follow."[20] Clarifying purpose and use is a critical step in establishing a governance structure that is transparent, consistent, and legally sound.

Classification

Under Utah state law, "classification" is defined as the process of "determining whether a record series . . . is public, private, controlled, protected, or exempt from disclosure."[21] The purpose of classifying a record is to govern the level of public access to such records, protect the privacy rights of the individual included in records, and provide a foundation for appropriately retaining and sharing records.

Governmental entities aren't required to classify records until it receives a request for the records as stated in code.[22] This has led to many governmental entities, especially smaller ones, not classifying proactively and instead reactively classifying records upon request.[23] Regarding this practice, a government records officer stated, "We are not classifying data as of present," explaining, "There's not someone that can take enough time to go through all the offices and sort through all that."[24] This lack of proactive classification leads to critical issues with how records are managed and how the public and other entities interact with them.

When governmental entities only classify records when they receive a GRAMA request, it can cause a delay of public service as the requestor has to wait for the governmental entity to classify the record appropriately before determining if the records can be disclosed.[25] Furthermore, data sharing between governmental entities and outside contractors imposes further administrative work as the originating entity is required to notify the receiving entity how the records are classified and the accompanying restrictions on access.[26]

In GRAMA, there are numerous and highly specific criteria to determine a record's classification which are often viewed as overly complex and outdated, creating a hurdle for public employees.[27] For example, as one government privacy officer noted, there are "eighty-three bullet points that determine whether a document is private or not," describing the system as "kind of outdated."[28] For smaller governmental entities, it can be challenging to understand all the various standards for classification and apply them correctly in each record.

A lack of clear and consistent standards for classifying records has led to inconsistencies across governmental entities and even within departments of governmental entities,[29] thus posing the risk of having private information incorrectly classified as public, and possibly leaking sensitive information. These inconsistencies compromise an individual's right to have their data managed responsibly by all governmental entities.

> "**THESE INCONSISTENCIES COMPROMISE AN INDIVIDUAL'S RIGHTS** TO HAVE THEIR DATA MANAGED RESPONSIBLY BY ALL GOVERNMENTAL ENTITIES"

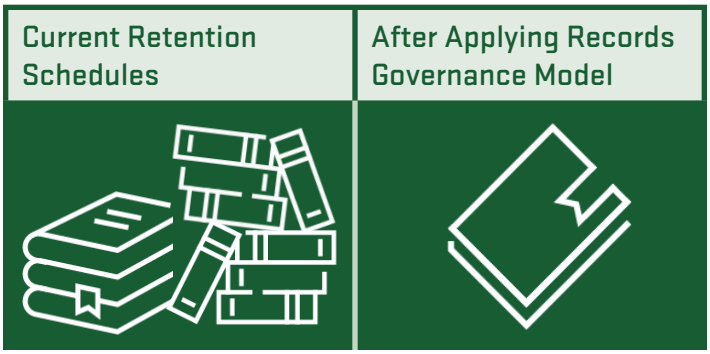
Appraisal and Valuation

Once a record is classified as public, private, controlled, protected, or exempt,[30] it must then undergo appraisal and valuation to determine its retention and long-term significance. Appraisal determines how long a record must be kept based on legal and operational requirements.[31] Valuation, closely related, measures a record's lasting importance (whether historical, fiscal, legal, or evidentiary) and guides whether it should be preserved or destroyed.[32] Together, these processes shape the retention schedule that governs a record's lifecycle and final disposition.

Retention

After a record's appraisal and valuation is determined, a retention schedule must be created. A retention schedule establishes the length of time a record must be held by the governmental entity before the record is destroyed or transferred to archives for permanent preservation. Its purpose is to minimize the amount of time governmental entities hold on to records while preserving records deemed necessary for legal, fiscal, administrative or historical value. Governmental entities are required to create a retention schedule for any record series they maintain and to dispose of the record series according to that retention schedule.[33] They may use state General Retention Schedules (GRS) created by the Division of Archives and Records Service (DARS) or submit their own schedule which must be approved by the Records Management Committee.[34]

State code dictates that governmental entities must choose between using GRS or creating their own retention schedules.[35] Many entities have opted to use GRS for the majority of their process, requesting an agency specific retention schedule as necessary. This system, however has yielded a large number of active retention schedules. Currently, there are 523 active retention schedules under the GRS and about another 1500 retention schedules that have been previously discontinued.[36] There are also approximately 250 current agency-specific retention schedules with 245 having been previously discontinued.[37] Larger governmental entities, particularly state agencies, tend to create their own schedules as GRS does not cover the specific retention schedules they have.[38]



One governmental entity has condensed their retention significantly down into two retention schedule options while another has struggled with having a unified retention schedule system within the entity itself.[39] Thus, governmental entities tend to have a disconnect between what is policy and what is actually practiced by each governmental entity, as many struggle with the numerous retention schedules or the actual disposal of digital record series themselves.

Adequate retention of record series has been a substantial challenge for governmental entities across Utah. With the process of correctly applying the right schedule and disposing of the records according to their schedules being complex, governmental entities can struggle adhering with retention requirements. This has created a situation where governmental entities are in noncompliance with Utah code regarding state retention requirements, challenging the principle that all forms of government should have a legal basis for their practices.[40]

Many government employees have struggled with the system calling it "a nightmare."[41] In addition to these varied schedules, some schedules depend on triggers to enact disposition. These schedules apply after a specific event has happened to trigger it. An example would be in a civil case file record, it will state for the record to be retained for "ten years after case is closed" and then destroyed.[42] This only further complicates how retention can be handled and provides more work for employees to monitor when final actions take place. Standardization and minimization of these schedules would significantly help clarify what actions need to take place and when.

Cities and counties, for example, may have similar record series, but may choose to apply different retention schedules. This is demonstrated with Salt Lake County having a defined records management system compared to smaller counties who have no definite system in place.[43] Thus, there is a scenario where the same type of data will be handled differently depending on the county, city, or agency where the record is being held. Furthermore, some governmental entities struggle with standardized retention schedules within their own administration. One public employee stated, "We don't have a centralized records retention system . . . Each department is doing its own thing."[44]

Across the state, IT systems that are currently being used to store, manage, and dispose of data were built when retention of data wasn't a focused design feature of the system.[45] This results in most systems being unable to automatically apply appropriate retention to record series. If governmental entities want to be compliant, they must search manually to figure out which records need to be deleted and which don't.[46] This is why records are not deleted; it is easier to simply retain records on the chance they may be needed. IT systems also struggle to track where the record series end up, and there are often duplicates of the data floating around or copies employees have on their local drive which are rarely documented.[47]

With all the previous problems, it should come as no surprise that governmental entities have had a difficult time applying retention to record series. Governmental entities currently have a substantial amount of records unaccounted for in storage files which should have been deleted years, if not decades ago.[48] This failure to dispose of records has further contributed to the retention problem as not only do current retention schedules need to be correctly applied, but past records must also be sorted and managed appropriately.

> "STANDARDIZATION AND **MINIMIZATION OF THESE SCHEDULES WOULD SIGNIFICANTLY HELP CLARIFY** WHAT ACTIONS NEED TO BE TAKEN AND WHEN."

Sharing Records

Records sharing is the process by which governmental entities provide other state and local governments, federal agencies, and authorized third parties access to records as stated in state statute.[49] Governmental entities share records because information collected by one may help another provide a public service.

Governmental entities may only share records with other governmental entities, federal and foreign governments, and private contractors as specifically described in statute.[50]

Receiving entities must give written assurance or enter into data sharing agreements stating they'll adhere to the restrictions on access and use established by the originating entity.[51] Written assurances are a general acknowledgement, while data sharing agreements are more detailed and include security requirements. Before a record may be shared, it must be correctly classified, and appropriate access and use guidelines must be established.[52] Current records sharing practices vary significantly across governmental entities as some have created rigorous contracts to inform recipients of the allowed use of shared data while others have loose agreements to allow data sharing without strict oversight on how it's managed.[53]

The loose regulatory framework and inconsistent implementation of data sharing agreements have created structural issues and have undermined effective data governance in Utah. These issues infringe upon the principle of individual control which requires that governmental entities handle public data appropriately.

Since state law requires the classification of data before sharing it, the reactive classification typically done by governmental entities risks noncompliance and delays in sharing the data.[54] If governmental entities share data without properly classifying it, private information is potentially exposed, thus creating privacy and legal issues.

The data sharing provisions in the code do not mention retention or data sharing agreements.[55] Without the proper retention of data being communicated or required, the receiving party will not know when they will need to dispose of all access and copies of the data received, thus further perpetuating the problem of data seldom being disposed of correctly.

Data ownership is also not clearly defined in state code sections discussing data sharing agreements.[56] If receiving parties do not keep track of who owns the information, they may misuse the data or disseminate it to other parties without data sharing agreements, thus creating multiple copies of the data or improperly disclosing confidential information.

State law doesn't provide a structure on how governmental entities should create data sharing agreements or how to hold receiving entities accountable to those contracts. One state employee described interstate agencies' data sharing agreements as being poorly constructed.[57] Without standards to follow, many governmental entities struggle to create effective agreements.

Synthetic Data Transformation

As governmental entities seek to share data for public transparency and operational coordination, they are often constrained by concerns about privacy, classification, and legal exposure. In light of these barriers, synthetic data has emerged as a potential path forward.

Synthetic data refers to artificially generated information that reflects the structure and statistical properties of real datasets without containing any actual personal or identifying details.[58] It allows agencies to replicate the utility of sensitive datasets without exposing personal information, enabling broader access while preserving individual privacy.

While Utah law does not currently define "synthetic data" in statute, the Government Data Privacy Act (GDPA) encourages data minimization, privacy preservation, and innovation.[59]

Despite growing interest, the use of synthetic data remains largely underutilized across Utah's governmental entities.[60] Without formal standards, implementation protocols, or shared tools to support widespread use, adoption has been slow. In the absence of structure, governmental entities are unsure how to move forward even as the need for privacy-protective data access grows. Interviews with employees reveal a widespread lack of familiarity with synthetic data and its potential applications.[61] Some remain unsure how to implement it, citing confusion about legal standing, acceptable use, and available tools.[62] As one participant noted, "Employees do not understand the system," adding, "The system must be simplified so employees can proceed with confidence."[63] Limited staffing has also contributed to the slowed progress. Without a statewide structure, current efforts remain isolated and dependent on external partnerships. Several core challenges continue to limit the adoption of synthetic data practices in Utah including the following:

A Lack of Standards and Legal Definition

Utah statutes, such as the GDPA and GRAMA, currently do not define or regulate synthetic data, leaving agencies without legal guidelines or guardrails for its use.

Technical Barriers and Local Capacity

Most municipalities lack the technical tools, system expertise, or funding to generate and validate synthetic data.[64] Without shared infrastructure, training, or centralized support, adoption efforts are inconsistent and resource dependent.

Accuracy and Validation Concerns

Poorly generated synthetic data may distort statistical outputs, leading to misinformed decisions. Without clear protocols for testing accuracy, agencies risk relying on flawed datasets.[65]

Insufficient Oversight

No statewide framework exists to govern when and how synthetic data should be used. As a result, transformation efforts remain siloed, and confidence remains low.[66]

Overcoming these barriers will require more than just technical solutions—it will demand strategic investment, policy development, and statewide coordination. As Utah works to modernize its data infrastructure, building statewide capacity for synthetic data transformation will be essential to balancing privacy, transparency, and innovation.

Records Governance Model

The preceding sections have detailed systemic issues with current data governance in Utah ranging from inconsistent classification to a lack of guidelines for synthetic data processes. These issues typically don't stem from a lack of effort from governmental entities but rather an absence of a unified framework for them to follow. To address these structural issues, this paper recommends a standardized approach using the Records Governance Model (RGM).

The Records Governance Model is a method for standardizing processes in data governance across the state of Utah. It provides guiding principles for managing classification, purpose and use, retention schedules, and other structural issues affecting Utah. The goal of this model is to ensure consistent and lawful data practices by standardizing procedures for managing records while still balancing privacy, transparency, and effective public service delivery.

RGM isn't a technical model; rather, it's a model guided by core principles which are key for responsible data governance. These guiding principles are present in this method of standardization and should be examined in any future actions regarding this concept. The principles are derived from best practices across the world and tailored to the state of Utah. They include the following:

Legal Basis

Data collected, used, or retained for records by governmental entities must be authorized by law or regulation.

Purpose Specificity

The use of a record must be tied to the governmental entity's defined public functions and not expanded beyond the original purpose.

Individual Rights and Control

Individuals' data[67] must be handled with fairness, transparency, and respect for their rights.

Security

All governmental entities should ensure that records are protected from unauthorized access.

Accountability

Governmental entities retain ownership over records collected on their behalf and are accountable for ensuring correct use of said records.

Standardization

Rules, definitions, and procedures must be applied consistently across all governmental entities to ensure equal protection of rights, clarity, and interoperability.

Minimization

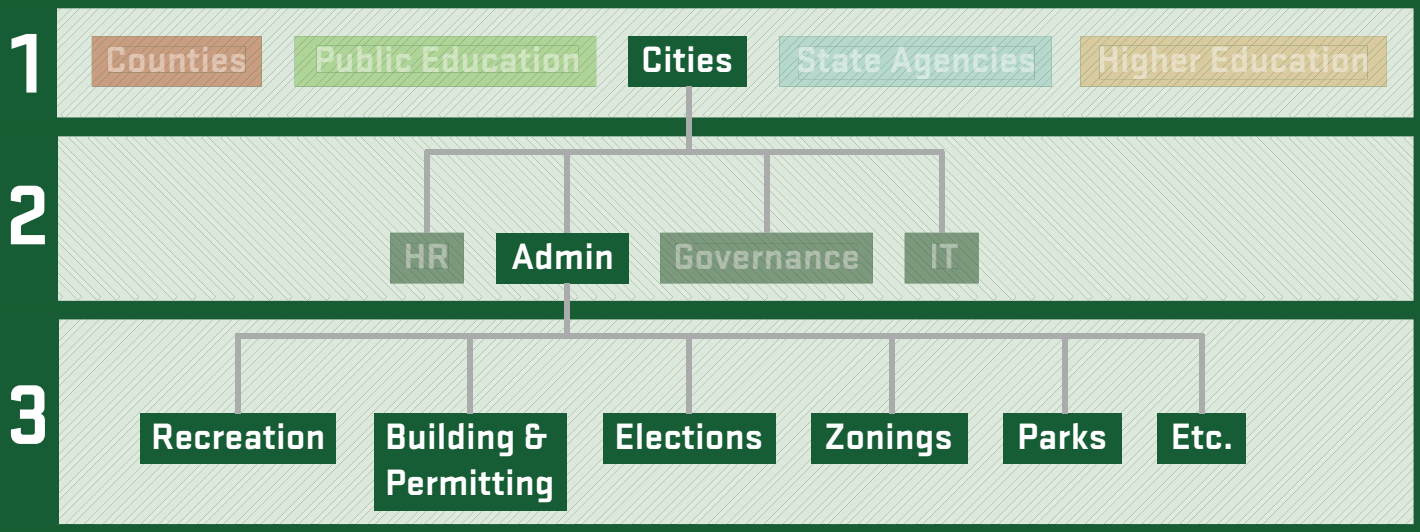
Minimization requires that governmental entities only create and retain records essential to provide a service, or fulfill a legal purpose.

Transparency

Citizens have the right to review decisions made with their personal data and to look through government processes to verify lawful use.

The diagram on the next page illustrates how governmental entities are organized by category, outlining their functions and related services.

GOVERNMENT SERVICES & FUNCTIONS DATA MODEL (GSFDM)



1. Categories of Government Entities

These are the governmental entities (e.g., cities, counties, higher education) that perform comparable functions, provide similar services, and manage the same records.

2. Common

This encompasses core operational functions that are similar across most categories of governmental entities, such as human resources, finance, governance, and administration. Within these categories, the collection and processing of personal data should be standardized to ensure governmental entities consistently protect individuals' privacy rights. Each domain will have its own separate model defined for that specific category of government.

3. Specific

The distinct public services delivered by governmental entities within a category separate them from the common services. For example, transportation agencies provide licensing and roadway management while schools provide enrollment and student services. Similarly parks and recreation departments offer facility reservations while libraries manage circulation of books throughout the area. These services should all follow standardized records management practices tailored to their service–specific needs.

The RGM works by classifying governmental entities into common categories of communal services and functions. The model would then propose simplifying and standardizing the core procedures of these governmental entities thus saving money and time for all the forms of government while assuring compliance to state statutes, protecting public privacy, and allowing transparency in government functions. The diagram above illustrates how governmental entities are organized by category, outlining their functions and related services.

Building on these principles, the Records Governance Model translates Utah's privacy and transparency standards into a functional structure that can be applied across all levels of government. Currently, state agencies, counties, and municipalities each manage records through separate systems and procedures, often resulting in duplicated effort and inconsistent application. Under the RGM, entities are grouped according to their core governmental functions, ensuring that organizations performing similar duties manage and maintain records in the same standardized way. In practice, the model applies across

three level– categories of government entities, generally applicable services and functions, and entity-specific services and functions. Each level establishes consistent rules for how records are managed and shared.

Each model (whether common or specific) provides concrete standards that balance privacy, transparency, and operational use while also meeting governance requirements for the classification, designation, retention, and disposal of records in addition to facilitating access to records and other records management needs.

Just as all hospitals follow standard protocols when managing a heart attack, all governmental entities should follow standard practices in relation to how they govern individuals' personal data. By replacing fragmented interpretations with clear statewide guidance, the RGM would streamline compliance, reduce burdens on government, and ensure individuals are treated fairly under the law.

If applied, this model would benefit the state of Utah by reducing the discrepancy in application of data procedures. Instead of governmental entities attempting to figure out each correct practice or procedure, they would be able to look to the state for guidance in data governance, thereby reducing the workload and financial requirements for all forms of government. The ability to standardize and simplify the records lifecycle process that governs the foundational structures of data management in Utah will increase the privacy of the individual, allow more effective service by all forms of government, and set the bar for achievable compliance for Utah.

Data Sharing

BEFORE	AFTER
• Data sharing agreements vary depending on the type of governmental entity.	• A framework is given for data sharing agreements for all governmental entities to follow.
• There are no set standards on how to share data. Retention and ownership of data is not prominent in agreements.	• Data sharing agreements are standardized across governmental entities to meet their shared needs, but may still vary to meet specific services and functions within distinct governmental entities.
• Data are being shared without much oversight and possibly being mishandled by unauthorized parties.	• All data are handled by correctly authorized parties and properly managed in terms of access and disposition.

Retention

BEFORE	AFTER
• There are a staggering amount of retention schedules across the state with DARS GRS and specific schedules.	• Retention schedules are simplified and standardized for all common overlaps in intrastate governments.
• Data are being stored and disposed of differently depending on the governmental entity.	• Data retention is now standardized across all forms of government, and Utah citizens' data are processed and disposed of correctly no matter where they live in the state.

Recommendations

The following recommendations are grounded in statewide workshops, town halls, legal analysis, and employee interviews,[68] all of which form the foundation for successful implementation of the Records Governance Model.

Establish Legal Authority

Require all governmental entities to document their legal authority for collecting and processing personal data.

Create Statewide Data Governance Structure

Rename the Privacy Commission to the Data Governance Commission, responsible for maintaining the Records Governance Model (RGM). Reconstitute the commission's membership to include representatives from all sectors of government.

Strengthen Oversight Through the Utah Privacy Governing Board

Amend the duties of the Utah Privacy Governing Board to include oversight of Utah's unified data governance vision, balance of privacy, transparency, and operational efficiency. Both the Data Governance Commission and the Utah Office of Data Privacy report directly to the board on implementation progress and strategic direction.

Consolidate and Standardize

Identify overlapping policies and procedures across governmental entities and consolidate them into a unified set of standards. The Data Governance Commission develops and maintains these standards through a broad consensus process. The Utah Office of Data Privacy provides technical and operational support in drafting, updating, and disseminating standards.

Evaluate Existing Records

Initiate a phased review to identify outdated records and data management practices, aligning them with current governance standards.

Modernize Legacy Systems

Ensure that all new and upgraded digital systems meet data governance requirements as part of a forward-looking modernization strategy.

Conclusion

Throughout this paper, a consistent theme has emerged: Utah's governmental entities face persistent challenges stemming from inconsistent implementation, outdated systems, and the absence of clear statewide standards. Individual efforts, though well-intentioned, cannot substitute for a unified framework. Without statewide alignment, Utah's approach to data governance will remain fragmented and unsustainable.

The Records Governance Model provides a practical path forward. By replacing unclear guidelines and redundant procedures with structured simplicity, the model reduces administrative friction and enables public employees to carry out their duties with greater clarity and confidence.

This paper calls on state and local officials to collaborate in establishing a unified system of data governance, one that standardizes common processes while limiting the collection of unnecessary personal data. Implementing this framework will strengthen accountability, ensure legal consistency, and enhance public trust.

Adopting the RGM is a necessary structural reform. As technology evolves faster than public systems can adapt, Utah must establish a coherent framework that protects privacy, ensures transparency, and promotes responsible data use. This action will fulfill the state's legal and ethical obligations and position Utah as a national leader in data governance.

Endnotes

1. William Freedman, Grace Wingate, Barclay Burns, and David R. Connelly, "The Current State of Data Governance in Utah: Balancing Data Privacy, Transparency, and Use," Gary R. Herbert Institute for Public Policy, Utah Valley University, February 2025.

2. The interviews cited throughout this white paper were conducted anonymously allowing respondents to provide information without impacting their role. Where publicly recorded, attribution of statements is sourced and identified, while statements provided during interviews have been included with the express consent of the interviewees. Any identifying information has been removed to protect their identities.

3. *Utah Code Annotated* § 63G-2-103(11) (2025).

4. Interview with government employee, March 31, 2025.

5. "Privacy Program Framework," Utah Office of Data Privacy, 2024.

6. *Utah Code Annotated* § 63A-19(2025), Utah Code Chapter 63A-19 (2025).

7. William Freedman, Grace Wingate, Barclay Burns, and David R. Connelly, "The Current State of Data Governance in Utah: Balancing Data Privacy, Transparency, and Use," Gary R. Herbert Institute for Public Policy, Utah Valley University, February 2025.

8. Christopher Bramwell, Data Governance Workshop with Office of Data Privacy, Seminar, Gary R. Herbert Institute for Public Policy, Utah Valley University, Utah Office of Data Privacy, May 16, 2025.

9. Christopher Bramwell, Data Governance Workshop with Office of Data Privacy, May 16, 2025; Christopher Bramwell, Data Governance Workshop with Office of Data Privacy Ombuds, Seminar, Gary R. Herbert Institute for Public Policy, Utah Valley University, Utah Office of Data Privacy, May 23, 2025.

10. Colleen McClain, et al., "How Americans View Data Privacy," Pew Research Center, October 18, 2023; How Americans View Data Privacy: Tech Companies, AI, Regulation, Passwords and Policies, Pew Research Center.

11. Utah Code Annotated § 63G-2-103(25) (2025).

12. Utah Code Annotated § 63G-2-103(26) (2025).

13. Utah Code Annotated § 63G-2-307 (2025); Utah Code Annotated § 63A-12-103 (2025).

14. Christopher Bramwell (Chief Privacy Officer, State of Utah) in a series of discussions with the authors, summer 2025.

15. Utah Code Annotated § 63A-19-401(1)–(2) (2025); Utah Code Annotated § 63A-19-402(1)–(2) (2025).

16. Utah Code Annotated § 63G-2-206(1)–(2) (2025); Utah Code Annotated § 63A-19-401(1)–(2) (2025); Utah Code Annotated § 63A-19-402(1)–(2) (2025).

17. Utah Division of Archives and Records Service. General Retention Schedule Items. Accessed October 23, 2025. https://axaemarchives.utah.gov/solr/axaem/GRSItem.

18. Interview with public employee, March 31, 2025.

19. Christopher Bramwell, Data Governance Workshop with Office of Data Privacy, May 16, 2025.

20. Christopher Bramwell, Data Governance Workshop with Office of Data Privacy, May 16, 2025.

21. Utah Code Annotated § 63G-2-103(3) (2025).

22. Utah Code Annotated § 63G-2-307(2) (2025).

23. Interview with public employee, March 28, 2025.

24. Interview with public employee, April 2, 2025.

25. Utah Code Annotated § 63G-2-307(2) (2025).

26. Utah Code Annotated § 63G-2-206(4)(b) (2025).

27. Utah Code Annotated § 63G-2-301 (2025); Utah Code Annotated § 63G-2-302 (2025); Utah Code Annotated § 63G-2-303 (2025); Utah Code Annotated § 63G-2-304 (2025); Utah Code Annotated § 63G-2-305 (2025).

28. Interview with public employee, May 20, 2025.

29. Interview with public employees, April 9, 2025.

30. Utah Code Annotated § 63-2-201 (2025).

31. Society of American Archivists, A Glossary of Archival and Records Terminology, s.v. "Appraisal," accessed June 11, 2025.

32. Utah Code Annotated § 63A-12-101(2)(e) (2025); Utah Code Annotated § 63A-12-103(4) (2025).

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34. Utah Code Annotated § 63A-12-103(5) (2025); Utah Code § 63G-2-604(1)(c) (2025);

35. Utah Code Annotated § 63G-2-604; Utah Code Annotated § 63G-2-701

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40. Christopher Bramwell, Data Governance Workshop with Office of Data Privacy, May 16, 2025; Bramwell, Christopher, Data Governance Workshop with Office of Data Privacy Ombuds, May 23, 2025.

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46. Christopher Bramwell, Data Governance Workshop with Office of Data Privacy, May 16, 2025.

47. Interview with public employee, May 20, 2025.

48. Christopher Bramwell, Data Governance Workshop with Office of Data Privacy Ombuds, May 23, 2025.

49. Utah Code Annotated § 63G-2-103(25) (2025).

50. Utah Code Annotated § 63G-2-206(1) (2025), Utah Code Annotated § 63G-2-206(5) (2025), Utah Code Annotated § 63G-2-206(6)(b) (2025).

51. Utah Code Annotated § 63G-2-206(2) (2025), Utah Code Annotated § 63G-2-206(4) (2025), Utah Code Annotated § 63G-2-206(6) (2025).

52. Utah Code Annotated § 63G-2-206(2) (2025).

53. Interview with public employee, May 20, 2025; Interview with public employee, May 27, 2025; Christopher Bramwell, Data Governance Workshop with Office of Data Privacy, May 16, 2025.

54. Utah Code Annotated § 63G-2-206(4)(b) (2025); Interview with public employee, March 28, 2025.

55. Utah Code Annotated § 63G-2-206 (2025).

56. Utah Code Annotated § 63G-2-206 (2025).

57. Interview with public employee, May 20, 2025.

58. National Institute of Standards and Technology (NIST), "Synthetic Data Use for Privacy Preservation;" U.S. Census Bureau.

59. Utah Code Annotated § 63A-19-102(3) (2025).

60. Christopher Bramwell, Data Governance Workshop with Office of Data Privacy Ombuds, May 23, 2025.

61. Christopher Bramwell, Data Governance Workshop with Office of Data Privacy Ombuds, May 23, 2025.

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