



**DATA
GOVERNANCE
SUMMIT**



GARY R. HERBERT INSTITUTE FOR PUBLIC POLICY

The mission of the Herbert Institute is to increase positive civic engagement among students, policy leaders, and the community by:

- Developing future policy leaders;
- Gathering the community to engage in respectful civic dialogue; and
- Building trust in civic institutions that are the foundation of our democratic republic.



**DATA
GOVERNANCE
SUMMIT**

SUMMIT SPONSORS



SUMMIT PARTNERS



**Department of
Public Safety**



**Department of
Government Operations**



**Division of
Technology Services**



**Division of Purchasing
& General Services**



**UTAH
ASSOCIATION OF
COUNTIES**

The Unifying Voice for County Government





**DATA
GOVERNANCE
SUMMIT**



HOUSEKEEPING



Life, Liberty, and the Pursuit of Happiness in the Digital Age



Christopher Bramwell

Chief Privacy Officer

Utah Office of Data Privacy



“

We the People of the United States, in Order to form a more perfect Union, establish **Justice**, insure domestic **Tranquility**, provide for the common **defence**, promote the general **Welfare**, and secure the Blessings of **Liberty** to ourselves and our **Posterity**, do ordain and establish this Constitution for the United States of America.”



- U.S. CONSTITUTION, PREAMBLE

A close-up, angled view of the original U.S. Constitution parchment. The words "We the People" are written in large, ornate calligraphy. Below it, the text "of the United States" is visible. The parchment is aged and yellowed, with some text in French visible at the bottom.



BORN

BIRTH CERTIFICATE



NEWBORN SCREENING



MEDICAID



SOCIAL SECURITY NUMBER



Born



Education



Driver's License



Work



Buy a Home



Healthcare



Retirement



End of Life



EDUCATION

STUDENT ENROLLMENT



MEALS & HEALTH SERVICES



LEARNING &
ACADEMIC RECORDS



TRANSPORTATION



SPECIAL EDUCATION
SUPPORT



COLLEGE &
FINANCIAL AID



Born



Education



Driver's License



Work



Buy a Home



Healthcare



Retirement



End of Life



DRIVER'S LICENSE

REAL ID COMPLIANT



INSURANCE VERIFICATION



DRIVER'S EDUCATION



VEHICLE REGISTRATION



FIRST PHOTO BIOMETRIC



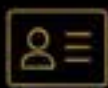
ON THE ROAD



Born



Education



Driver's License



Work



Buy a Home



Healthcare



Retirement



End of Life



WORK

EMPLOYMENT RECORDS



WORK AUTHORIZATION



TAXES



WORKPLACE SAFETY



PAYMENT & BENEFITS



RETIREMENT CONTRIBUTIONS



Born



Education



Driver's License



Work



Buy a Home



Healthcare



Retirement



End of Life



BUY A HOME

DEED TRANSFER
& RECORDING



BUILDING PERMITS
& INSPECTIONS



PROPERTY
TAX



ZONING & LAND
USE RECORDS



HOMESTEAD
EXEMPTION



UTILITY CONNECTION
SERVICES



Born



Education



Driver's License



Work



Buy a Home



Healthcare



Retirement



End of Life



HEALTHCARE

HEALTH INSURANCE
ENROLLMENT



IMMUNIZATION
RECORDS



CONTROLLED SUBSTANCE
DATABASE



PRESCRIPTION
HISTORY



LAB RESULTS
& TEST RESULTS



MEDICAL CLAIMS
& BILLING



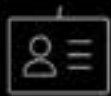
MEDICAL RECORDS
ACCESS



Born



Education



Driver's License



Work



Buy a Home



Healthcare



Retirement



End of Life



RETIREMENT

SOCIAL SECURITY
BENEFITS



TAX-ADVANTAGED
RETIREMENT ACCOUNTS



PENSION BENEFITS
INFORMATION



ESTATE PLANNING
RECORDS



MEDICARE
ENROLLMENT



DISABILITY BENEFITS
INFORMATION



CONSERVATORSHIPS
INFORMATION



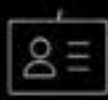
VETERANS BENEFITS
SERVICES



Born



Education



Driver's License



Work



Buy a Home



Healthcare



Retirement



End of Life





END OF LIFE

DEATH CERTIFICATE
& RECORDING



FUNERAL & BURIAL
PERMITS



PROBATE & ESTATE
ADMINISTRATION



LIFE INSURANCE
POLICY RECORDS



WILLS & TRUST
RECORDS



BENEFICIARY
DESIGNATIONS



POWER OF ATTORNEY
RECORDS



VETERANS BURIAL
BENEFITS



Born



Education



Driver's License



Work



Buy a Home



Healthcare



Retirement

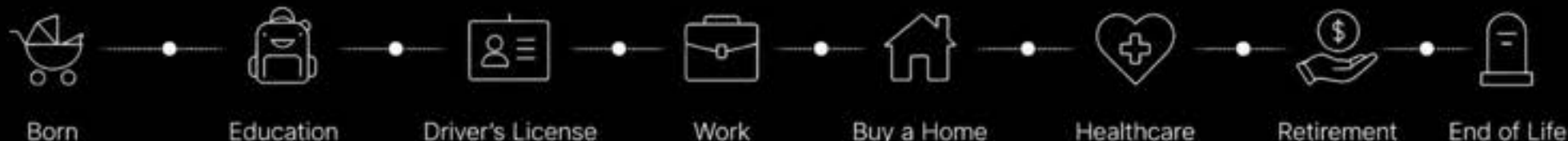


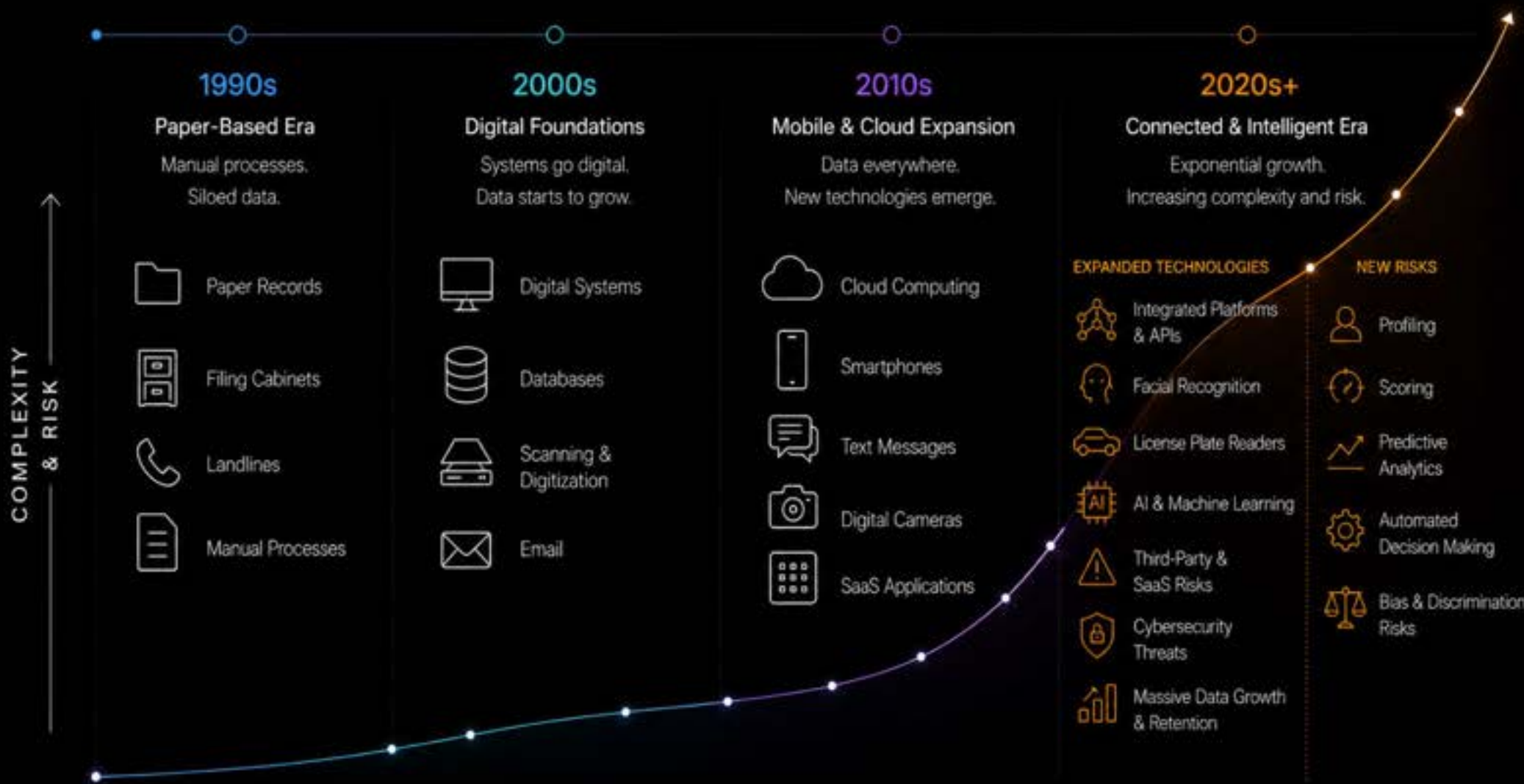
End of Life

Every interaction adds a piece to the **mosaic of your life**.



Individually, each piece of data may seem small.
Together, they reveal a **detailed picture**.





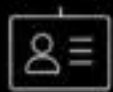
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Born



Education



Driver's License



Work



Buy a Home



Healthcare



Retirement



End of Life

1

DO NOT CREATE A WORLD WHERE IDENTITY REQUIRES PERMISSION

At the start of every government interaction, individuals should be able to prove who they are without surrendering control of their identity or having to go through a 3rd party intermediary.



WHAT MODERNIZATION PRESSES US TOWARD

Strong identity verification often evolves into systems controlled by intermediaries.

- Proprietary identity networks
- Vendor-controlled systems
- Centralized verification services
- Identity products that create dependency



Individuals should control their identity.



Individuals prove who they are without being dependent on a specific vendor.



Government verifies and endorses identity.



Systems are secure, private, and portable.

DESIRED OUTCOME



At the beginning of every government interaction, individuals can prove who they are in a secure, privacy-preserving manner **with no tracking or surveillance.**

We don't want a world where you ever have to go through a **3rd party** to prove who you are.

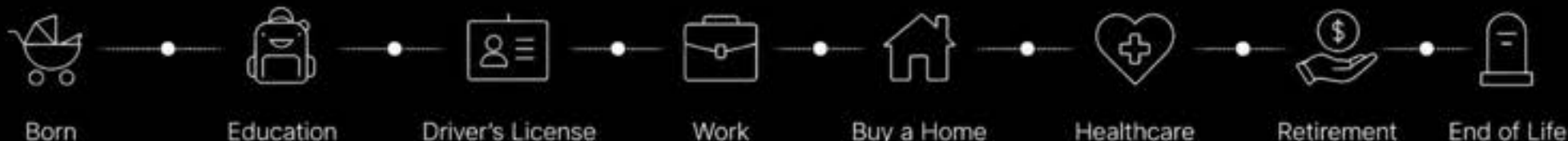


STATE-ENDORSED DIGITAL IDENTITY

Every interaction adds a piece to the **mosaic of your life.**



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2

RESIST THE TEMPTATION TO TURN PEOPLE INTO SCORES

Once data is digitized and consolidated, the next step is often profiling, risk scoring, predictive analytics, and automated decision making.

The technology can be useful.

The **danger** is that government begins to know individuals primarily through models rather than through due process, context, and human judgment.



PROFILING



RISK SCORING



PREDICTIVE ANALYTICS



AUTOMATED DECISIONS

WHAT MODERNIZATION PRESSES US TOWARD

The ability to analyze massive amounts of data creates pressure to:

- Profile individuals
- Assign risk scores
- Forecast behavior and outcomes
- Automate decisions at scale



FAIRNESS FIRST

People deserve fairness, context, and the opportunity to be heard.



HUMAN JUDGMENT MATTERS

Models can help inform decisions, but humans must make them.



ACCURACY & BIAS AWARENESS

Models can be wrong or biased. Know the limits.



TRANSPARENCY & ACCOUNTABILITY

Individuals deserve to know how decisions are made and have recourse.

“

Government should **not** know people **better** than they know themselves.

Where these capabilities are necessary and authorized, focus on **limited and constrained** systematic approaches as opposed to systemic.

”

DESIRED OUTCOME



Analytics **improve** service delivery while preserving individual dignity, fairness, and accountability.

Government should **not** know people **better** than they know themselves.

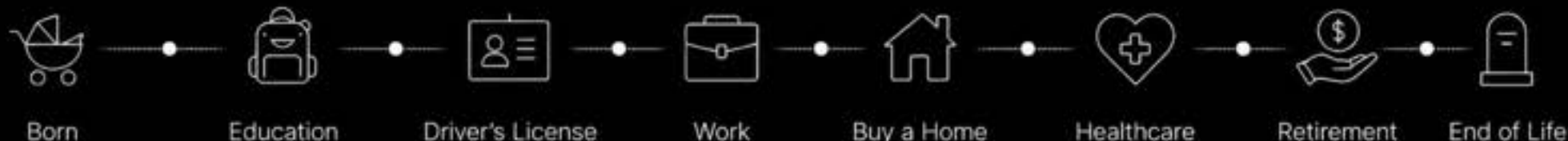


DATA GOVERNANCE MODELS

Every interaction adds a piece to the **mosaic of your life.**



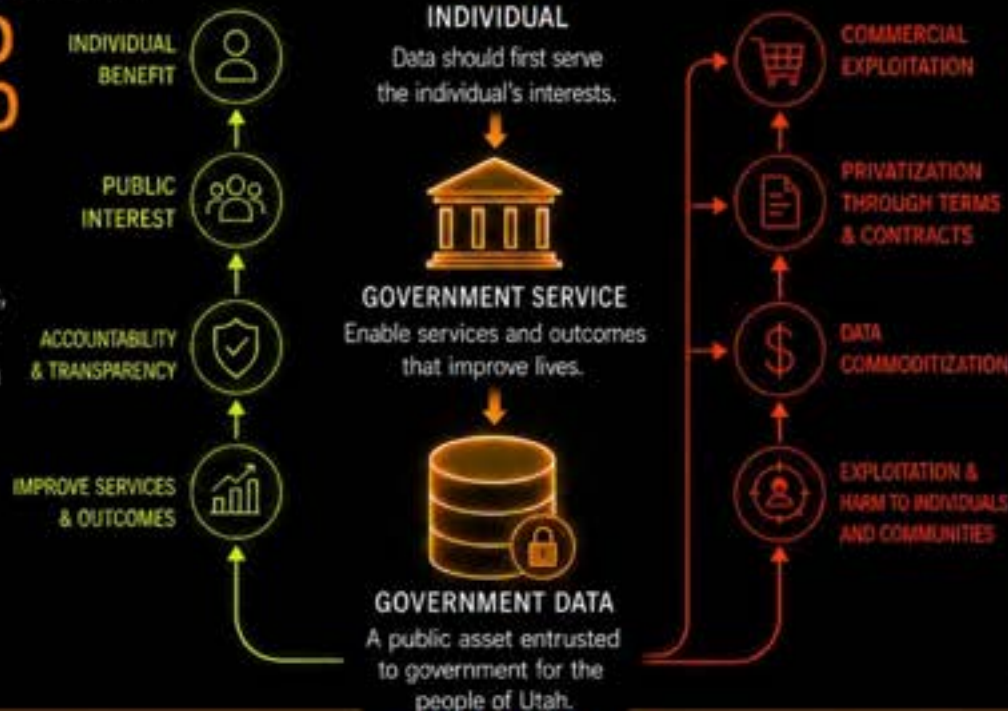
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3 DO NOT ALLOW GOVERNMENT DATA TO BE COMMODITIZED AND EXPLOITED

Government data is not a product. It is a trust.

It exists to serve individuals and the public, not private gain. We must protect against the growing pressure to extract value from public data for commercial or private purposes.



WHAT MODERNIZATION PRESSES US TOWARD

- Hand over data to vendors and platforms
- Accept broad terms that grant licensess, ownership, or perpetual rights
- Allow data to train AI and other commercial models
- Reuse data beyond original purpose
- Monetize or share data for profit
- Shift public assets into private control



INDIVIDUALS FIRST

Data should be used first for the benefit of the individual, with their rights, dignity, and choices protected.



THEN THE PUBLIC INTEREST

After serving individuals, data may be used to advance the public good and strengthen communities.



STEWARD THE PUBLIC TRUST

We are responsible for protecting public data for current and future generations.



Individuals have control and benefit from their data.



DESIRED OUTCOME

Government uses data to deliver trusted, effective services and advance the public interest.



Public value is created, measured, and returned to the people of Utah.



OUR OBLIGATION

We are stewards of public data, entrusted by the people of Utah. We must protect it, govern it wisely, and ensure it is never sold, licensed, or used in ways that exploit individuals or harm the public.

Public data should never be someone else's product or profit.



RECORDS VALUATION AND 3RD PARTY CONTRACTS

Utah's Data Governance Ecosystem

GOVERNMENTAL ENTITIES ACROSS THE STATE



State Agencies



Cities



Counties



Service Districts



K-12 Education



Higher Education



Special Districts



Courts & Justice

Each entity is accountable for governing its data and meeting its privacy, records management, and transparency obligations.



UTAH OFFICE OF DATA PRIVACY

Tools, resources, and training to assist entities in meeting their privacy obligations.



DIVISION OF ARCHIVES AND RECORDS SERVICE

Tools, resources, and training to assist entities in meeting their records management and transparency obligations.



GOVERNMENT RECORDS OFFICE

Hears and resolves transparency complaints.



UTAH PRIVACY COMMISSION

Reviews government privacy practices and recommends standards and best practices.



OFFICE OF THE STATE AUDITOR

Independently audits data governance practices across any state or local entity.



ATTORNEY GENERAL

Independently enforces data governance requirements on anyone.



UTAH LEGISLATURE

Independently defines and passes legislative data governance requirements.



UTAH PRIVACY GOVERNING BOARD

Brings leaders together, aligns efforts across the state, and moves Utah toward achieving its privacy vision.








OUR SHARED VISION

Protect privacy. Ensure transparency. Strengthen trust. Serve Utahns.

What Entities Are Expected to Do

General privacy and records governance practices every entity should follow.

CATEGORY	IDENTIFIER	PRIVACY PRACTICE
 GOVERN Establish governance and accountability for privacy and records management.	1.1	Chief Administrative Officer (CAO) Designation
	1.2	Records Officer Appointment
	1.3	Records Officer Training and Certification
	1.4	Statewide Privacy Training
	1.5	Privacy Program Report
 IDENTIFY Identify and understand the records and personal data you create and maintain.	2.1	Record Series Creation and Maintenance
	2.2	Record and Record Series Designation and Classification
	2.3	Statement Filed with State Archivist
	2.4	Retention Schedule Proposal and Approval
	2.5	Record Series Privacy Annotation
	2.6	Inventorying
	2.7	Privacy Impact Assessments (PIA)
	2.8	Record and Personal Data Sharing, Selling, and Purchasing
 CONTROL Empower individuals and manage their rights and access to their data.	3.1	Data Subject Requests for Access
	3.2	Data Subject Requests for Amendment or Correction
	3.3	Data Subject Requests for an Explanation
	3.4	Data Subject Requests by At-Risk Employees for Restricting Access
 COMMUNICATE Be transparent about how personal data is collected, used, and shared.	4.1	Privacy Notice (Notice to Provider of Information)
	4.2	Website Privacy Notice and Website Privacy Policy
 PROTECT Protect personal data and respond promptly to risks and incidents.	5.1	Minimum Data Necessary
	5.2	Retention and Disposition of Records Containing Personal Data
	5.3	Incident Response and Notification to the Cyber Center and Attorney General
	5.4	Breach Notification to Affected Individuals

PRIVACY MATURITY MODEL

This model is how entities will be measured longitudinally over time as we **track progress** over the next decade.

5		OPTIMIZED The practice is fully embedded in the entity with recognition and understanding across the workforce through active training and awareness campaigns, and inclusion in operations and strategy.
4		MANAGED The practice is actively managed with metrics that are reviewed to assess efficacy and facilitate improvement.
3		CONSISTENTLY IMPLEMENTED The practice is documented to cover all relevant aspects, application is formal and consistent.
2		DEFINED The practice is implemented and documented, but documentation may not cover all relevant aspects, and application may be informal and inconsistent.
1		AD HOC The practice may occur but is undocumented (no policies or procedures), application is reactive and not standardized.
0		NON-EXISTENT The practice is not implemented or acknowledged.

PRIVACY MATURITY HEAT MAP

CATEGORY	IDENTIFIER	PRIVACY PRACTICE	ENTITY 1	ENTITY 2	ENTITY 3	ENTITY 4	ENTITY 5	ENTITY 6	ENTITY 7
 GOVERN	1.1	Chief Administrative Officer (CAO) Designation	1	2	1	2	1	0	2
	1.2	Records Officer Appointment	2	1	1	0	2	1	1
	1.3	Records Officer Training and Certification	1	2	0	1	1	0	2
	1.4	Statewide Privacy Training	2	1	1	1	0	1	0
	1.5	Privacy Program Report	0	1	0	1	1	0	1
 IDENTIFY	2.1	Record Series Creation and Maintenance	2	1	1	2	1	1	1
	2.2	Record and Record Series Designation and Classification	1	0	1	1	2	0	1
	2.3	Statement Filed with State Archivist	0	1	0	0	1	0	1
	2.4	Retention Schedule Proposal and Approval	1	1	1	0	1	0	0
	2.5	Record Series Privacy Annotation	0	0	1	0	0	0	1
	2.6	Inventorizing	1	1	0	1	1	0	0
	2.7	Privacy Impact Assessments (PIA)	0	1	0	0	0	0	1
	2.8	Record and Personal Data Sharing, Selling, and Purchasing	1	0	1	1	0	0	1
 CONTROL	3.1	Data Subject Requests for Access	1	1	0	1	0	0	1
	3.2	Data Subject Requests for Amendment or Correction	0	1	1	0	1	0	0
	3.3	Data Subject Requests for an Explanation	0	0	0	1	0	0	1
	3.4	Data Subject Requests by At-Risk Employees for Restricting Access	0	1	0	0	0	0	0
 COMMUNICATE	4.1	Privacy Notice (Notice to Provider of Information)	2	1	1	1	1	0	1
	4.2	Website Privacy Notice and Website Privacy Policy	1	1	0	1	0	0	1
 PROTECT	5.1	Minimum Data Necessary	2	1	1	1	1	0	1
	5.2	Retention and Disposition of Records Containing Personal Data	1	0	1	1	0	0	1
	5.3	Incident Response and Notification to the Cyber Center and Attorney General	0	1	0	1	0	0	0
	5.4	Breach Notification to Affected Individuals	0	0	0	1	0	0	0

MATURITY LEVEL KEY



PRIVACY MATURITY HEAT MAP

CATEGORY	IDENTIFIER	PRIVACY PRACTICE	ENTITY 1	ENTITY 2	ENTITY 3	ENTITY 4	ENTITY 5	ENTITY 6	ENTITY 7
 GOVERN	1.1	Chief Administrative Officer (CAO) Designation	2	3	2	2	2	1	2
	1.2	Records Officer Appointment	2	2	2	1	2	2	1
	1.3	Records Officer Training and Certification	2	3	1	2	1	1	2
	1.4	Statewide Privacy Training	3	2	2	2	1	2	1
	1.5	Privacy Program Report	1	2	1	2	1	1	2
 IDENTIFY	2.1	Record Series Creation and Maintenance	2	2	2	3	2	1	2
	2.2	Record and Record Series Designation and Classification	2	1	2	2	2	1	2
	2.3	Statement Filed with State Archivist	1	2	1	1	2	1	1
	2.4	Retention Schedule Proposal and Approval	2	2	2	1	2	1	2
	2.5	Record Series Privacy Annotation	1	1	2	2	1	1	1
	2.6	Inventorizing	2	2	1	2	2	1	2
	2.7	Privacy Impact Assessments (PIA)	1	2	1	2	1	1	2
	2.8	Record and Personal Data Sharing, Selling, and Purchasing	2	1	2	2	2	1	2
 CONTROL	3.1	Data Subject Requests for Access	2	2	2	2	1	1	2
	3.2	Data Subject Requests for Amendment or Correction	1	2	1	1	1	1	1
	3.3	Data Subject Requests for an Explanation	1	1	2	1	2	1	1
	3.4	Data Subject Requests by At-Risk Employees for Restricting Access	1	2	1	1	1	1	1
 COMMUNICATE	4.1	Privacy Notice (Notice to Provider of Information)	2	2	2	2	2	1	2
	4.2	Website Privacy Notice and Website Privacy Policy	2	2	1	2	1	1	2
 PROTECT	5.1	Minimum Data Necessary	3	2	2	2	2	1	2
	5.2	Retention and Disposition of Records Containing Personal Data	2	2	2	1	2	1	2
	5.3	Incident Response and Notification to the Cyber Center and Attorney General	1	2	1	2	1	1	1
	5.4	Breach Notification to Affected Individuals	1	1	1	2	1	0	1

MATURITY LEVEL KEY

5 Optimized
 4 Managed
 3 Consistently Implemented
 2 Defined
 1 Ad Hoc
 0 Non-Existent

PRIVACY MATURITY HEAT MAP

CATEGORY	IDENTIFIER	PRIVACY PRACTICE	ENTITY 1	ENTITY 2	ENTITY 3	ENTITY 4	ENTITY 5	ENTITY 6	ENTITY 7
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	1.2	Records Officer Appointment	3	3	2	3	3	2	3
	1.3	Records Officer Training and Certification	3	3	2	3	2	2	3
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	1.5	Privacy Program Report	2	3	2	3	3	2	2
 IDENTIFY	2.1	Record Series Creation and Maintenance	3	3	3	4	3	2	3
	2.2	Record and Record Series Designation and Classification	3	2	3	3	3	2	3
	2.3	Statement Filed with State Archivist	2	3	2	2	3	2	2
	2.4	Retention Schedule Proposal and Approval	3	3	3	2	3	2	3
	2.5	Record Series Privacy Annotation	2	2	3	3	2	2	3
	2.6	Inventorying	3	3	2	3	3	2	3
	2.7	Privacy Impact Assessments (PIA)	2	3	2	3	2	2	3
	2.8	Record and Personal Data Sharing, Selling, and Purchasing	3	2	3	3	3	2	3
 CONTROL	3.1	Data Subject Requests for Access	3	3	3	3	3	2	3
	3.2	Data Subject Requests for Amendment or Correction	2	3	2	3	2	2	3
	3.3	Data Subject Requests for an Explanation	2	2	3	2	3	2	2
	3.4	Data Subject Requests by At-Risk Employees for Restricting Access	2	3	2	2	2	1	2
 COMMUNICATE	4.1	Privacy Notice (Notice to Provider of Information)	3	3	3	3	3	2	3
	4.2	Website Privacy Notice and Website Privacy Policy	3	3	2	3	2	2	3
 PROTECT	5.1	Minimum Data Necessary	4	3	3	4	3	2	3
	5.2	Retention and Disposition of Records Containing Personal Data	3	3	3	3	3	2	3
	5.3	Incident Response and Notification to the Cyber Center and Attorney General	2	3	2	3	2	2	2
	5.4	Breach Notification to Affected Individuals	2	2	2	3	2	1	2

MATURITY LEVEL KEY

5

Optimized

4

Managed

3

Consistently
Implemented

2

Defined

1

Ad Hoc

0

Non-Existent

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	1.3	Records Officer Training and Certification	3	4	3	3	2	2	3
	1.4	Statewide Privacy Training	4	3	3	3	3	2	3
	1.5	Privacy Program Report	3	3	2	3	3	2	3
 IDENTIFY	2.1	Record Series Creation and Maintenance	4	3	3	4	3	2	3
	2.2	Record and Record Series Designation and Classification	3	3	3	3	3	2	3
	2.3	Statement Filed with State Archivist	2	3	2	3	3	2	2
	2.4	Retention Schedule Proposal and Approval	3	3	3	2	3	2	3
	2.5	Record Series Privacy Annotation	3	2	3	3	2	2	3
	2.6	Inventorying	3	3	2	3	3	2	3
	2.7	Privacy Impact Assessments (PIA)	2	3	2	3	2	2	3
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 CONTROL	3.1	Data Subject Requests for Access	3	3	3	3	3	2	3
	3.2	Data Subject Requests for Amendment or Correction	2	3	2	3	2	2	3
	3.3	Data Subject Requests for an Explanation	2	2	3	2	3	2	3
	3.4	Data Subject Requests by At-Risk Employees for Restricting Access	2	3	2	2	2	1	2
 COMMUNICATE	4.1	Privacy Notice (Notice to Provider of Information)	3	3	3	3	3	2	3
	4.2	Website Privacy Notice and Website Privacy Policy	3	3	2	3	3	2	3
 PROTECT	5.1	Minimum Data Necessary	4	3	3	4	3	2	3
	5.2	Retention and Disposition of Records Containing Personal Data	3	4	3	3	3	2	3
	5.3	Incident Response and Notification to the Cyber Center and Attorney General	2	3	2	3	2	2	2
	5.4	Breach Notification to Affected Individuals	2	2	2	3	2	1	2

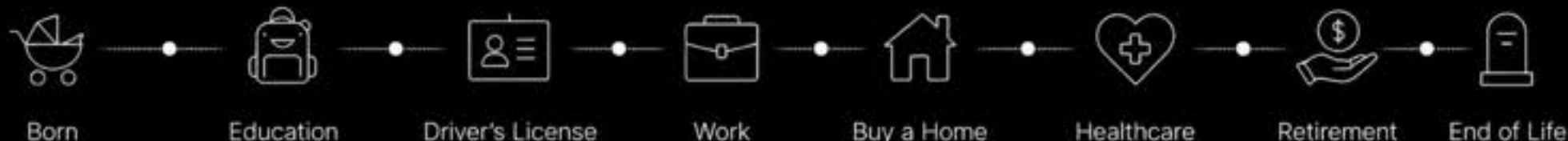
MATURITY LEVEL KEY

5 Optimized	4 Managed	3 Consistently Implemented	2 Defined	1 Ad Hoc	0 Non-Existent
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Every interaction adds a piece to the **mosaic of your life.**



Individually, each piece of data may seem small.
Together, they reveal a **detailed picture.**



“

We the People of the United States, in Order to form a more perfect Union, establish **Justice**, insure domestic **Tranquility**, provide for the common **defence**, promote the general **Welfare**, and secure the Blessings of **Liberty** to ourselves and our **Posterity**, do ordain and establish this Constitution for the United States of America.”



- U.S. CONSTITUTION, PREAMBLE

A close-up, angled view of the original parchment of the U.S. Constitution. The words "We the People" are written in large, elegant cursive at the top. Below it, the text "of the United States" is visible. Further down, the words "Article 1" are written in a similar cursive hand. The parchment is aged and yellowed, with some darker spots and a slightly textured appearance. The lighting is dramatic, highlighting the texture and the flow of the script.

“ We hold these truths to be self-evident,
that all men are created equal,
that they are endowed by their Creator
with certain unalienable Rights,
that among these are **Life, Liberty**
and the pursuit of **Happiness.**”



– DECLARATION OF INDEPENDENCE

JULY 4, 1776

IN CONGRESS, JULY 4, 1776.
The unanimous Declaration of the thirteen united States of America.

When, in the course of these events, it became necessary to explain the causes which had led to the separation, and to declare the reasons which had induced the Congress to take this step, the unanimous Declaration of the thirteen united States of America was adopted. The Congress therefore declared the independence of the United States of America, and they supported their Declaration by solemnly affirming and publishing the following truths, to be acknowledged by all mankind.

Policy Architects



Senator Kirk Cullimore
Majority Leader, District 19
Utah State Senate



Marvin Dodge
Executive Director
Utah Department of Government Operations



Moderator: Justin Jones
Senior Director
Gary R. Herbert Institute for Public Policy, UVU



Representative Paul Cutler
State Representative, District 18
Utah House of Representatives



Christopher Bramwell
Chief Privacy Officer
Utah Office of Data Privacy



