

A United Model for Data Governance in Utah

By: David Connelly, PhD, Research Director, Associate Professor, History/Political Science; Reese Boardman, Data Governance, Research Assistant; Bradley Smith, Data Governance, Research Assistant; John Nelson, Graphic Design Assistant; Becca Aylworth Wright, Editor

Introduction

Across Utah, governmental entities¹ face persistent challenges as they work to comply with data governance requirements. Employees of both state agencies and political subdivisions have repeatedly expressed confusion about how to properly manage and provide access to records while balancing transparency and privacy.² One official described navigating the Division of Archives³ general retention schedules as “guesswork,” adding, “a lot of [schedules] overlap and sometimes it’s just a judgment call.”⁴ The interviews cited throughout this white paper were conducted anonymously, allowing respondents to provide information without impacting their role in government.

While circumstances may differ, these accounts all point to the same conclusion: governmental entities are struggling to manage data effectively under the state’s existing system. To address this uncertainty, it is first necessary to define what data governance is and how it applies within Utah’s governmental framework.

Defining Data Governance

Data governance refers to the structured system of policies, practices, and procedures that guide how entities manage data, ensuring data is classified, retained, and used in accordance with the law, while upholding protections for both privacy and public transparency.⁵ Inconsistent application of this structure forces agencies to rely on individualized procedures that undermine consistency and efficiency.

Challenges in Utah’s Data Governance System

Utah’s current fragmented approach to data governance has resulted in the following issues:



Operational Inefficiency and Cost

Disjointed classification and retention create duplicated efforts, inefficient storage, and manual processes that unnecessarily strain public resources.⁶



Legal and Compliance Risks

Without consistent legal standards, governmental entities risk noncompliance, exposing operations to penalties and damaging public confidence.⁷



Erosion of Public Trust

When data is mishandled through weak or inconsistent data-sharing agreements, public engagement declines, undermining accountability and service delivery across the state.⁸

The core issues outlined above stem from the same root problem: Utah lacks a consistent structure for governing records⁹ across all entities. To address this, the Records Governance Model (RGM) is proposed as a unified framework for data governance across all levels of government.

Core Principles

The Records Governance Model is designed to resolve these challenges by establishing a consistent foundation for data governance across all entities. It is guided by eight core principles that translate legal and ethical requirements into practical standards for managing records responsibly. The following principles serve as the foundation for unified data governance throughout Utah.

Legal Basis

Data collected, used, or retained by government entities must be authorized by law or regulation.

Purpose Specificity

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

Individual Rights & Control

Individuals’ data¹⁰ 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 of 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

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.

These principles establish the common standards on which Utah's Records Governance Model operates; however, standards alone are not enough. To ensure they are applied consistently, the model organizes governmental entities by their core functions, creating a practical system that promotes alignment across the state.

Records Governance Model

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 levels: 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.

Categories of Government Entities

Groups of government bodies (cities, counties, universities) that perform similar functions and manage comparable records.

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.

Common

Shared operations across all entities—HR, finance, governance, administration—where data collection and privacy practices should be standardized.

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.

Specific

Unique public services that differ by entity—like schools, libraries, or parks—each with tailored records management suited to their functions.

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 road-way 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.

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.

Recommendations

The following recommendations are grounded in statewide workshops, town halls, legal analyses, and employee interviews,¹¹ all of which point to the same conclusion—a unified, consistent approach is essential. The following actions are designed to support successful implementation of the RGM.

Establish Legal Authority: All governmental entities must document the legal authority for processing personal data.

Create Statewide Data Governance Structure: Change the name of the Privacy Commission to the Data Governance Commission which is responsible for maintaining the RGM. The Legislature should consider recomposing the Commission membership to include members that represent governmental entities from all sectors.

Utah Privacy Governing Board: The Legislature should consider amending the duties of the Utah Privacy Governing Board to include duties which will move Utah toward a unified data governance vision that balances privacy and transparency. Both the new Utah Data Governance Commission and the Utah Office of Data Privacy would report directly to the Board regarding the work done, strategic approach, and progress made to actualize this unified data governance vision.

Consolidate and Standardize: Identify overlapping policies and procedures across entities and consolidate them into a unified set of standards that can be easily adopted by governmental entities. The Data Governance Commission would be required to create and maintain the standards using a broad consensus model. The Utah Office of Data Privacy would provide technical and operational support by drafting, updating, and disseminating the standards.

Evaluate Existing Records: Launch a phased initiative to identify outdated records and data practices which should be aligned with modern practices.

Modernize Legacy Systems: Verify that future digital systems meet data governance requirements as part of a forward-looking strategy.

Conclusion

This policy brief serves as a call to action for policymakers and officials across Utah's governmental entities to collaborate in creating a system of data governance which standardizes commonly shared processes while minimizing the amount of personal data collected and retained to deliver efficient and lawful public services.

Adopting the Records Governance Model offers a clear path forward. In a digital world which continues to evolve faster than most public systems can adapt, Utah must act decisively to establish a coherent framework ensuring privacy, transparency, and responsible data use. Doing so will not only strengthen legal compliance and operational consistency, but also position Utah as a national leader in data governance.

Endnotes

1. Utah Code Annotated § 63G-2-103(12)(2025).
2. Interview with public employee, March 28, 2025; Interview with public employee, March 31, 2025; Interview with public employee, April 2, 2025; Interview with public employee, April 7, 2025; Interview with public employee, April 9, 2025.
3. General Retention Schedule Items (website), Utah Gov-Ops - Archives, Division of Archives and Record Service, accessed September 30, 2025, https://axaemarchives.utah.gov/solr/axaem/GRSItem?qry-recordType=GRSItem&rows=25&qry-grsItemCategories=&qry-grsItemHasEntity=No&q=%2BrecordType%3AGRSItem+%2BgrsItemHasEntity%3ANo&start=0&fq=grsItemHasEntity%3ANo&fq=%7B%21tag%3DGRSITEM-REVISION%7DgrsItemRevision%3A%22Current%22&gl=1*1lasgp9*_ga*MjEzNjQ4MjYzNi4xNzU5MjU0Mjk5*_ga_YGCRKVVVNN*czE3NTkyNTQyOTkjbzE-kZzAkdDE3NTkyNTQyOTkajYwJGwwJGgw
4. Interview with public employee, March 31, 2025.
5. Utah Office of Data Privacy, Privacy Program Framework, 2024, https://privacy.utah.gov/wp-content/uploads/OfficeofDataPrivacy_Privacy_Program_Framework_v2.pdf.
6. Interview with public employee, May 20, 2025; Interview with public employee, April 2, 2025.
7. Bramwell Chris, Data Governance Workshop with Office of Data Privacy, Seminar, UVU Gary R. Herbert Institute for Public Policy, Utah Office of Data Privacy, May 16, 2025; Bramwell Chris, Data Governance Workshop with Office of Data Privacy Ombuds, Seminar, UVU Gary R. Herbert Institute for Public Policy, Utah Office of Data Privacy, May 23, 2025.
8. McClain Colleen, 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.
9. Utah Code Annotated § 63G-2-103(25)(2025); Utah Code Annotated § 63G-2-103(26)(2025).
10. Utah Code Annotated § 63A-19-101(13)(2025).
11. Utah Code Annotated § 63G-2(2025), Utah Code Chapter 63G-2; Utah Code Annotated § 63A-19(2025), Utah Code Chapter 63A-19; Utah Code Annotated § 63A-12(2025), Utah Code Chapter 63A-12; Bramwell, Data Governance Workshop with Office of Data Privacy, May 16, 2025; Bramwell, Data Governance Workshop with Office of Data Privacy Ombuds, May 23, 2025; Christopher Bramwell (Chief Privacy Officer, State of Utah) in a series of discussions with the authors, summer 2025; Interview with public employee, March 28, 2025; Interview with public employee, March 31, 2025; Interview with public employee, April 2, 2025; Interview with public employee, April 7, 2025; Interview with public employee, April 9, 2025.

Gary R. Herbert Institute Staff and Advisors

LEADERSHIP TEAM

Gary R. Herbert, Founder, 17th Governor of Utah
Justin Jones, MS, Senior Director
David Connelly, PhD, Research Director, Associate Professor, History/Political Science
Erik Nystul, Program Director, Government Internships
Karen Gill, Events Manager
Becca Aylworth Wright, Communications Manager
Jonathan Barton, Project Specialist

ASSOCIATED LEADERS

Dan Dimond, Sr. Director Institutional Advancement, UVU Foundation
Liv Moffat, Development Director, Herbert Foundation

FACULTY FELLOWS

Tara B. B. Bishop, PhD, Assist. Prof. Earth Science / Enviro Mgmt., Earth Sciences, Herbert Fellow
Alan Parry, PhD, Assoc. Prof. Mathematics, Herbert Fellow
George Rudolph, PhD, Chair/Professor, Computer Science, Herbert Fellow
Majid Memari, PhD, Assistant Professor, Computer Science, Herbert Fellow

RESEARCH INTERNS

Cade Bloomer, Research Assistant
Christ Hermes Louyoko Nianza, Federalism Intergovernmental Research Assistant
Reese Boardman, Data Governance, Research Assistant
Bradley Smith, Data Governance, Research Assistant
Wyatt Robinson, WRI, GIS Mapping Assistant
Xander Greenwood, Utah Lake/Conservation Research Assistant
Ethan Howlett, Data Governance AI Developer
Kaytlin Stratton, AI Project Manager Assistant
Aaron Tracy, Federalism Initiative
Kayla Cullimore, Data Governance and Federalism Initiative

EVENT ASSISTANTS

Eva McCullough, Event Assistant
Emilee Cook, Event Assistant
Jade Haymore, Event Assistant

COMMUNICATIONS/GRAPHIC DESIGN ASSISTANTS

Rebecca Whyte, Communications Assistant
Daisy Nielson, Communications Assistant
John Nelson, Graphic Design Assistant
Brooklyne Anderson, Graphic Design Assistant
Londan Duffin, Graphic Design Assistant