



office of
Data Privacy

Privacy Program Framework

What do governmental entities need to do?

Utah Code § 63A-19-401

(2) A governmental entity:

(a) shall implement and maintain a privacy program before May 1, 2025, that includes the governmental entity's policies, practices, and procedures for the process of personal data;



The Privacy Program Framework is a standardized guide designed to help Utah's governmental entities understand their generally applicable privacy obligations, and to implement and mature privacy programs that ensure compliance, transparency, and accountability.



Laws

Government Data Privacy Act

Government Records Access and Management Act

Division of Archives and Records Service

Governmental Internet Information Privacy Act

State Privacy Policy and Agency Privacy Policies



Govern	1	Designate Chief Administrative Officers (CAO)	Transparency	11	Website Privacy Policy
	2	Appoint Records Officers		12	Privacy Notice (Notice to Provider of Information)
Record Series	3	Create and maintain Records Series	Processing	13	Minimum Data Necessary
	4	Designate and Classify Records Series and Records		14	Record and Data Sharing or Selling
	5	Retention Schedule Proposal and Approval		15	Retention and Disposition of Records Containing Personal Data
	6	Record Series Privacy Annotation	Information Security	16	Incident Response
Awareness and Training	7	Appointed Records Officer Training and Certification	Individual Requests	17	Breach Notification
	8	Statewide Privacy Awareness Training		18	Data Subject Requests for Access
Identify	9	Inventorying		19	Data Subject Requests for Amendment or Correction
	10	Privacy Impact Assessment		20	Data Subject Requests for an Explanation
					21

Non-Existent	The practice is not implemented or acknowledged.
Ad Hoc	The practice may occur but is undocumented (no policies or procedures), application is reactive and not standardized.
Defined	The practice is implemented and documented, but documentation may not cover all relevant aspects, and application may be informal and inconsistent.
Consistently Implemented	The practice is documented to cover all relevant aspects, application is formal and consistent.
Managed	The practice is actively managed with metrics that are regularly reviewed to assess efficacy and facilitate improvement.
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.

Framework User Journey

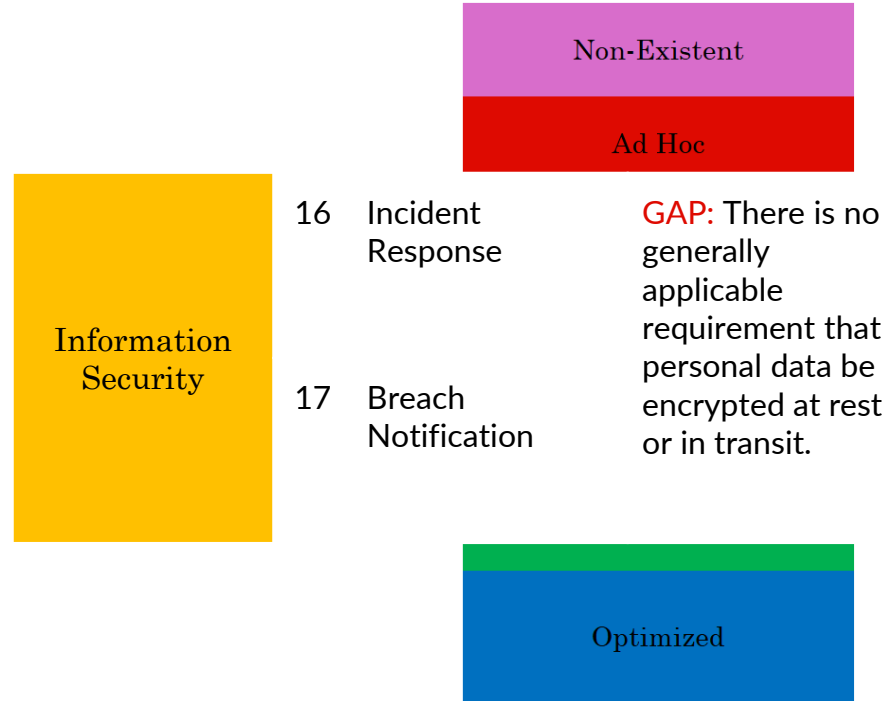
A **governmental entity** can use the Framework’s practices, maturity model, and associated templates and training resources to establish a privacy program, conduct impact assessments, and progressively advance its practices to higher maturity levels.



Privacy Practices	Current Maturity	Strategies	Target Maturity
1. Designate Chief Administrative Officers (CAO)	Red		Yellow
2. Appoint Records Officers	Red		Yellow
3. Create and maintain Records Series	Red		Yellow
4. Designate and Classify Records Series and Records	Red		Yellow
5. Retention Schedule Proposal and Approval	Red		Yellow
6. Record Series Privacy Annotation	Red		Yellow
7. Appointed Records Officer Training and Certification	Red		Yellow
8. Statewide Privacy Awareness Training:	Red		Yellow
9. Inventory of Processing Activities	Red		Yellow
10. Privacy Impact Assessment	Red		Yellow
11. Website Privacy Policy	Red		Yellow
12. Privacy Notice (Notice to Provider of Info.)	Red		Yellow
13. Minimum Data Necessary	Red		Yellow
14. Record and Data Sharing or Selling	Red		Yellow
15. Retention and Disposition of Records Containing Personal Data	Red		Yellow
16. Incident Response	Red		Yellow
17. Breach Notification	Red		Yellow
18. Data Subject Requests for Access	Red		Yellow
19. Data Subject Requests for Amendment or Correction	Red		Yellow
20. Data Subject Requests for an Explanation	Red		Yellow
21. Data Subject Request by At-Risk Employees for Restricting Access	Red		Yellow

Framework User Journey

The **Utah Privacy Commission** can leverage the Framework in identifying and reviewing the privacy practices of governmental entities for the development of best practices and to inform legislative recommendations.



Framework User Journey

The **Utah Office of Data Privacy** can use the Framework to develop standardized statewide training programs, ensuring all governmental entities are educated on generally applicable privacy obligations and privacy best practices.

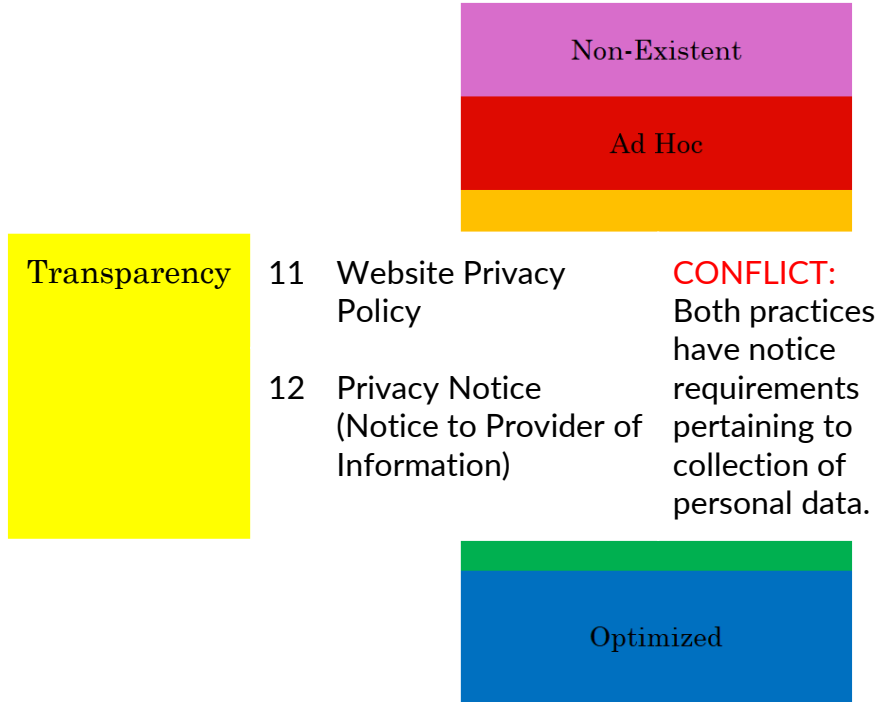


Production Status	Framework	Policy Template	Slide Deck	Webpage	Statewide Training	Executive Summary	Microtraining	Handout	Privacy Institute
Practice 1	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 2	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 3	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 4	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 5	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 6	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 7	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 8	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 9	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 10	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 11	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 12	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 13	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 14	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 15	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 16	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 17	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 18	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 19	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 20	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive
Practice 21	Review	Review	Post-Production	Review	Review	Review	Review	Review	Inactive

Inactive
 Pre-Production
 Post-Production
 Review
 Complete

Framework User Journey

The **Utah Office of Data Privacy** can use the Framework to identify conflicts and gaps in data privacy related laws and the corresponding privacy practices to make recommendations for solutions and improvements.



Framework User Journey

Internal and external auditors can use the Framework to systematically audit governmental entity compliance with privacy obligations, identifying issues and concerns and providing actionable recommendations for improvement.



	Practice	Policy Compliance	Procedure Compliance
1	Designate Chief Administrative Officers (CAO)	✓	✓
2	Appoint Records Officers	✓	✓
3	Create and maintain Records Series	✓	✗
4	Designate and Classify Records Series and Records	✗	✗
5	Retention Schedule Proposal and Approval	✓	✗
6	Record Series Privacy Annotation	✗	✓
7	Appointed Records Officer Training and Certification	✗	✗
8	Statewide Privacy Awareness Training	✓	✗

Requested additions for Privacy Program Framework Version 1.1

1. Inclusion of Generally Applicable Requirements for Counties, Cities, and Special Service Districts
 - Expand the framework to provide clear privacy requirements that apply broadly to counties, cities, and special service districts, ensuring consistency while accounting for their unique operational capabilities and needs.
2. Provision of Templated Tools and Resources
 - Develop and include templated tools and resources that align with and map back to the framework, such as:
 - Privacy Program Policies
 - Data Sharing Agreements
 - Privacy Impact Assessments



Other Updates

Utah Valley University partnership:

- White papers.
- AI prototype of Utah data governance knowledge base.
- Data governance conference (May 2025).

