



Agenda
High Valley Transit District
Thursday, June 18, 2026, 2PM

NOTICE is hereby given that the Board of Trustees will meet on Thursday, June 18, 2026 electronically, via Zoom and at the anchor location at the High Valley Transit campus at 1570 Sego Lily Way, Park City, Utah 84098.

Public comment may also be submitted via email to hi@hvtutah.gov before 12pm on Wednesday, June 17, 2026.

To participate electronically:
<https://zoom.us/j/98570375324?pwd=S9bbf6rV9bjNxYYBUYzfczm238vQyd.1&from=addon>

Or, to listen by phone, dial 1-301-715-8592

Meeting ID: 985 7037 5324

Passcode: 868571

This meeting may be recorded

Public Meeting

- 1) Pledge of Allegiance
- 2) Public Comment

Work Session

- 3) Capital update
- 4) Human resources update

Closed Session Procurement discussion, Personnel, Potential litigation

Consideration of Approval

- 5) Minutes dated May 21, 2026
- 6) Discussion and possible declaration of surplus property
- 7) Discussion and possible amendment to the Chart of Positions to add a (budget neutral) vehicle cleaner and a (budget neutral) Strategic Sourcing Manager
- 8) Discussion and possible adoption of a Privacy Policy

- 9) Discussion and possible appointment of Allie Shorkey as the Chief Administrative Officer under HVT's Privacy Policy
- 10) Discussion and possible approval of the Amended and Restated Transit as-a-Service (TAAS) Service Order for Wasatch County between High Valley Transit and River North Transit LLC
- 11) Discussion and possible approval of Amendment #2 to the Amended and Restated Transit as-a-Service (TAAS) Service Order for Summit County between High Valley Transit and River North Transit LLC
- 12) Discussion and possible approval of a salary increase for Executive Director, Caroline Rodriguez

Board Comments

Director Comments

Written updates Ridership and performance

Members of the Board, presenters, and members of the public may attend and fully participate by electronic means, using Zoom (phone or video).

Non-Discrimination Notice The High Valley Transit District's policy is that no person, regardless of race, color, or national origin shall be excluded from participation in, be denied the benefits of, or be subject to any discrimination under any program, activity, or services under Section 601 of Title VI of the Civil Rights Act, as amended. To view a copy of our Title VI Policy and Complaint Procedure, please contact us at (435) 246-1538. If you require this or any information in an alternative format, please contact us at (435) 246-1538.

HR Update

Health and Wellness

June 18, 2026



High Valley

TRANSIT

PEHP Health Insurance — First Rebate

\$986

First Rebate

What is the PEHP rebate?

Rebates are issued when actual costs come in lower than projected — a positive reflection of employee health trends and plan management. This is not a significant refund, but recognition of favorable utilization.

How the rebate is calculated:

60%

Experience / Usage

Actual claims & healthcare utilization

30%

Longevity in Pool

Long-term stability in the plan

10%

Member Engagement

Participation in wellness programs

Award Recognition

Employee Group Size
of 101 - 250

Physical Well-being Category

Employee Group Size of
101 - 250

**Physical Well-being
Category**

*Recognized for excellence
in employee physical
wellness through our
employee gym program.*

Award Recognition



2nd Place

Physical Well-being Category

PEHP Employer Awards | 101–250 Employee Group

Recognized for excellence in employee physical wellness through our employee gym program.

Employee Wellness Garden

Wellness benefits beyond nutrition:

Grounding

Contact with nature reduces
cortisol & stress

Physical Activity

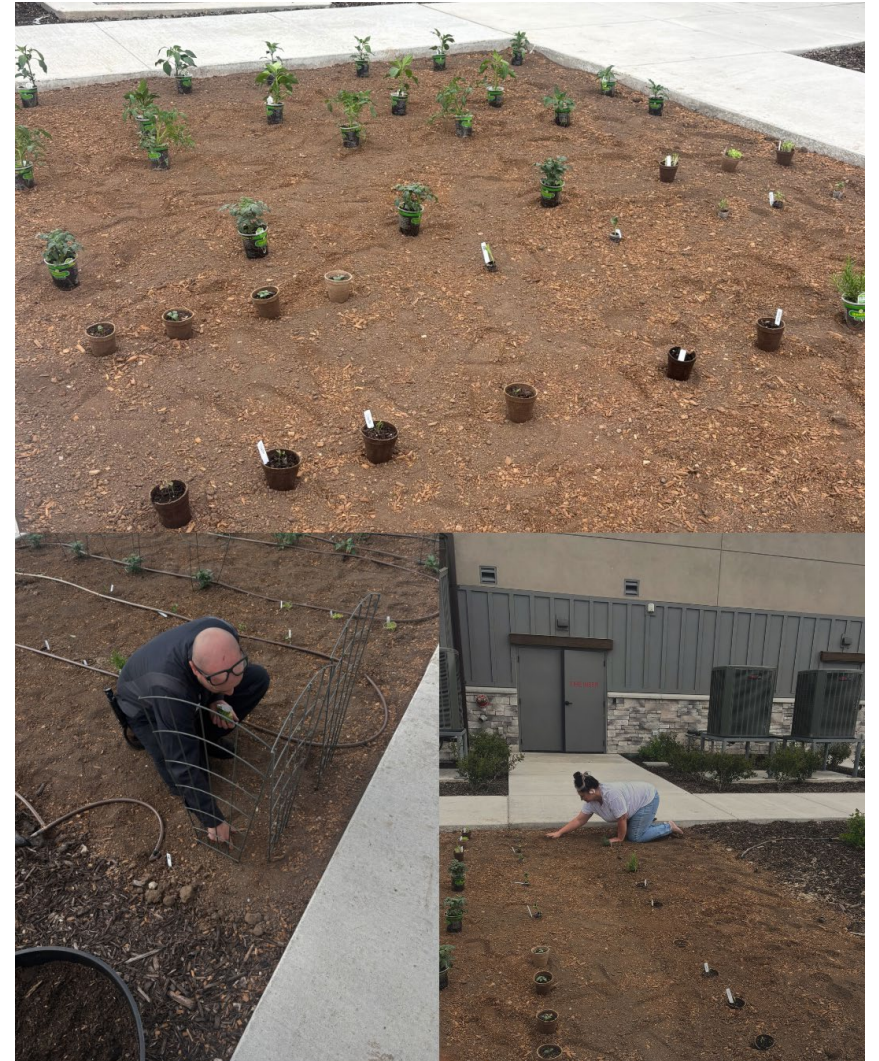
Light movement counters
prolonged sitting

Sense of Purpose

Pride in tending and
growing builds fulfillment

Vitamin D

Outdoor time supports
mood & immune health



Why Wellness Matters

The majority of staff positions are **sedentary in nature**, creating a heightened need for intentional wellness support.

Staff has been actively implementing wellness initiatives to:

- Increase employee engagement – which is tied to reduction in voluntary turnover
- Healthier, more engaged employees help reduce claims and utilization — directly supporting lower costs

High Valley Transit District
Board of Trustees Minutes
Thursday, May 21, 2026
Virtual Meeting via Zoom
1570 Sego Lily Way
Park City, Utah 84098



Members of the Board of Trustees, presenters, and members of the public could attend by electronic means using Zoom (phone or video).

BOARD OF TRUSTEES PRESENT:

Kim Carson, Chair
David Geffen, Vice Chair (via Zoom)
Peter Tomai, Board Member (via Zoom)
Megan McKenna, Board Member (via Zoom, partial)

Bob Zanetti, Board Member
Tonja Hanson, Board Member (partial)
Chris Robinson, Board Member (via Zoom)

A quorum was present.

ABSENT: none

STAFF PRESENT:

Caroline Rodriguez, Executive Director
Jolena Ashman, Finance Director

Brad Herkimer, Chief Operations Officer
Stephen Rackleff, Fleet Manager

ATTENDING GUESTS:

Dave Thomas, Attorney
Eric Hicks

Public Meeting
Pledge of Allegiance
Public Comment: None

1) Finance Update – Q1 2026 Report

Finance Director J. Ashman presented the Q1 2026 financial report. Key highlights included:

- Overall financials are on track; revenues and expenses are generally matching the budget.
- The income statement has been expanded with departmental breakdowns (departments 4100–4700).
- Balance Sheet: The PTIF cash balance shows a notable decline due to BRT payments made ahead of reimbursements; some Q2 reimbursements have since been received.
- Sales Tax: Revenue has been more resilient than expected. Staff developed a stoplight tracking tool comparing actuals to 3-year historical averages; all months through April remain in the “green” range. January was strong; March was slightly down; April recovered.
- Fuel Costs: A fuel cost analysis projects approximately \$130,000 over budget for 2026 if current costs hold. Staff considers this manageable.
- Grants: The ICAM grant is nearly fully utilized; one final payment (~\$39,000) expected in July. A new Rural and Tribal Assistance Pilot Program grant was awarded to plan future routes. TTIF funding increased by \$15 million, with an additional \$2.5 million per quarter beginning Q3 2026. The Low No grant and a 5311 bus grant are still awaiting final contracting signatures.
- Fraud Risk Assessment: Included in the board packet as required by auditors; no vote needed.
- Annual Audit: In progress; auditors are working on the single audit (federal funds over \$1M threshold). Staff has provided all requested materials and the process appears on track.

2) Capital Update – SR-224 Bus Rapid Transit

Executive Director C. Rodriguez presented the BRT construction update. Key points:

- Construction is underway and progressing quickly. Crews have removed planned medians, begun pipe installation on outer lanes, and completed significant utility work.
- No major incidents related to construction have occurred.
- The communications team has been highly responsive to public inquiries, with a 24-hour response requirement and near-immediate actual turnaround on emails and calls.
- Right-of-way acquisitions are on schedule; one parcel remains under discussion.
- Board Member Tomai commended Stacy Whitbeck for maintaining two lanes of traffic throughout construction while accomplishing significant work in a short period.

3) Approval of Meeting Minutes – March 26, 2026 and April 16, 2026

Minutes from March 26, 2026 were presented with the following noted correction:

- Under Board Comments, a reference to Eric Hicks should read “has been working with HVT staff” rather than “HVT programs.”

- Vice Chair Geffen requested that the adjournment motion following closed session be added.

Motion: Board Member Tomai moved to approve the minutes from March 26, 2026 with the noted corrections.

Second: Board Member Zanetti

In Favor:

Board Chair Carson
Board Vice Chair Geffen
Board Member Tomai
Board Member Zanetti
Board Member Hanson
Board Member Robinson

Opposed: None

Vote: 6-0

Result: Motion approved unanimously

Absent at time of vote: Board Member McKenna

April 16, 2026 minutes were presented with no corrections noted.

Motion: Board Member Robinson moved to approve the minutes from April 16, 2026 as presented.

Second: Board Member Zanetti

In Favor:

Board Chair Carson
Board Vice Chair Geffen
Board Member Tomai
Board Member Zanetti
Board Member Hanson
Board Member Robinson

Opposed: None

Vote: 6-0

Result: Motion approved unanimously

Absent at time of vote: Board Member McKenna

4) Authorization – Real Estate Purchase Contract (DC Park City One Property LLC) – SR-224 BRT

Executive Director C. Rodriguez requested Board authorization to execute a real estate purchase contract for 600 feet of SR-224 frontage road necessary for the BRT project. Key details:

- Seller: DC Park City One Property LLC
- Purchase Price: \$769,200, consistent with the appraised valuation.
- Board approval required because the purchase price exceeds the Executive Director's \$750,000 purchasing authority.

- All contract redlines submitted by the purchaser's attorney were reviewed and approved by HVT legal counsel Dave Thomas prior to the meeting.

Motion: Board Member Geffen moved to authorize the Executive Director to execute the real estate purchase contract with DC Park City One Property LLC for an amount not to exceed \$769,200.

Second: Board Member Hanson

In Favor:

Board Chair Carson
 Board Vice Chair Geffen
 Board Member Tomai
 Board Member Zanetti
 Board Member Hanson
 Board Member Robinson
 Board Member McKenna (joined during vote)

Opposed: None

Vote: 7-0

Result: Motion approved unanimously

5) Board Comments

Board Chair Carson:

- Staff is planning a charrette-style half-day meeting with Wasatch County Council, Heber City, Midway, MIDA, and other stakeholders to identify transportation needs, as well as implications for potential annexation or continuation under contract.
- A loose version of a Joint Transportation Advisory Board (JTAP) is being explored to facilitate regular dialogue. Wasatch County Council members expressed interest in quarterly meetings aligned with HVT board meetings.
- Tomai noted the Wasatch meeting was constructive overall, with municipalities eager for more transit service. Some county members remain transit-skeptical.
- Next board meeting: June 18, 2026 at 2:00 p.m.
- The board briefly discussed moving to bi-monthly meetings; this will be addressed as part of the Executive Director's upcoming review process.

Board Member Robinson:

- Requested closer collaboration between HVT and the P3 developer on Kimball Junction Transit Center site design, noting concerns about massing at the southeast corner of the P3 site, right-of-way access, and 100-foot setback constraints.

Board Member Geffen:

- Commended staff for strong grant performance. Inquired about the status of the 5311 bus grant; staff confirmed it is awaiting a final director-level signature at the federal level.

6) Director Comments

Executive Director C. Rodriguez provided the following updates:

- FTA Administrator Visits: HVT hosted former FTA Administrator Molinaro and, more recently, two FTA deputy administrators who toured the facility and BRT corridor.
- Peer Agency Visits: HVT has hosted representatives from New Jersey Transit, Pierce Transit, and Toledo.
- New Bus Procurement: The maintenance team visited Gillig to inspect the first of five buses on order. Delivery timeline to be confirmed.
- Grants: HVT has achieved several competitive grant wins in recent months.
- FTA Leadership: A new FTA administrator is expected to be named within two weeks.
- Apprenticeship Program: The U.S. Department of Labor has officially recognized HVT's apprenticeship program.
- Aspire Partnership (USU): HVT continues to build its relationship with Aspire at Utah State University, with benefits in knowledge sharing, electrification, and exploration of autonomous vehicles.
- Kimball Junction Transit Center / P3: Design coordination between HVT operations and the P3 podium project continues.

7) Motion to Enter Closed Session

Motion:

Board Member Robinson moved to enter closed session for procurement and personnel matters.

Second: Board Member Zanetti

In Favor:

Board Chair Carson
Board Vice Chair Geffen
Board Member Tomai
Board Member Zanetti
Board Member Hanson
Board Member Robinson

Opposed: None

Vote: 6-0

Result: Motion approved unanimously

Absent at time of vote: Board Member McKenna

The board returned from closed session. A motion to close the personnel item was made by Vice Chair Geffen and seconded by Board Member Robinson; vote was unanimous with Board Member Hanson absent.

8) Adjournment

Motion: Board Member Geffen moved to adjourn the meeting.

Second: Board Member Tomai

In Favor:

Board Chair Carson
Board Vice Chair Geffen
Board Member Tomai
Board Member Zanetti
Board member Robinson
Board Member McKenna

Opposed: None

Vote: 6-0

Result: Motion approved unanimously

Absent at time of vote: Board Member Hanson

Adopted date:

Carson, Board Chair



STAFF REPORT

Date: June 3rd, 2026
To: Board of Trustees
From: Jolena Ashman, Finance Director
Subject: Declaration of Surplus Property

Action Requested

Discussion and possible approval for the disposition of surplus property in the amount of \$130,000.

Background

As per the following requirement in HVT's policies and procedures:

*Surplus personal property with a value in excess of **\$10,000.00** may not be disposed of until the Board has declared the property to be surplus, after which it may be disposed of for the benefit of the district in a commercially reasonable manner as directed by the Board.*

The Maintenance Department has determined that one of the district's vehicles, a 2024 Chevrolet Silverado equipped with a crane body, is no longer necessary for District operations and occupies valuable space that could be utilized for other operational needs. The vehicle has accumulated approximately 400 miles over the past two years, demonstrating minimal operational use. Staff have evaluated potential future uses and does not anticipate a need for the vehicle going forward.

The original purchase price of the vehicle was \$105,500, with an additional \$30,000 invested in the accompanying equipment. Staff believe the current market value of the vehicle and equipment package is approximately \$130,000 and recommend establishing a minimum acceptable sale price of \$115,000.

Staff request that the Board declare the vehicle and associated equipment surplus property and authorize its sale through J.J. Kane Auction's private sale program or another commercially reasonable method that maximizes value to the district.



STAFF REPORT

Date: June 18, 2026
To: Board of Trustees
From: Allie Shorkey, Human Resources Director & Caroline Rodriguez, Executive Director
Subject: Amendment to High Valley Transit's Chart of Positions

Action Requested

Discussion and possible amendment to the Chart of Positions.

Budget impact: budget neutral

Background

Vehicle Cleaner:

For the past four (4) years, cleaning of the micro van fleet has been managed by Via, through a contract for service. Currently, HVT employs five (5) Wash Bay Attendants dedicated to maintaining the cleanliness of full-size buses and cutaway vehicles; this team is operating at full capacity. Adding one (1) Wash Bay Attendant would allow HVT to bring micro fleet cleaning in-house at a net-neutral cost (Via would continue to pay the full cost, via a bill credit), while also providing flexible support for fixed-route operations as workload permits.

Strategic Sourcing Manager – Fleet:

HVT's current Fleet Manager has organically taken on responsibilities that extend beyond the scope of the current role, including strategic vendor relationships, contract oversight, and procurement functions critical to fleet operations. As HVT continues to grow, these responsibilities are expected to expand further.

The proposal to amend the position of Fleet Manager to Strategic Sourcing Manager – Fleet better reflects the work currently being performed and provides a framework for additional responsibilities aligned with the District's growth objectives. This title change represents a career advancement opportunity for an established team member and comes at a net-neutral cost to the organization, as it is funded through a reclassification of the existing position rather than the addition of a new headcount.

Encl: Job Descriptions for Wash Bay Attendant and Strategic Sourcing Manager – Fleet, Current Chart of Positions



HIGH VALLEY TRANSIT JOB DESCRIPTION - APPROVED

Job Title: Wash Bay Attendant

Reports To: Facilities Supervisor

Salary: \$19.00 – \$25.00/hour

Department: Maintenance

Overview:

The Wash Bay Attendant is responsible for maintaining the cleanliness and appearance of transit vehicles and related equipment within the wash bay facility. This position plays a crucial role in ensuring the safety, functionality, and aesthetics of the transit fleet, contributing to the overall mission of providing safe and reliable public transportation services.

Key Responsibilities:

- Operate and maintain wash bay equipment, including pressure washers, vacuums, and other cleaning tools.
- Perform routine washing and detailing of buses and other transit vehicles, ensuring adherence to cleanliness and safety standards.
- Inspect vehicles for damage or maintenance needs while cleaning and report findings to the Maintenance Supervisor.
- Maintain cleanliness and organization of the wash bay area, including proper disposal of waste materials and cleaning supplies.
- Follow all safety protocols and guidelines to ensure a safe working environment.
- Assist in inventory management of cleaning supplies and equipment, reporting shortages as necessary.
- Collaborate with maintenance staff to support any additional cleaning or maintenance tasks as assigned.
- Attend training sessions and meetings as required.

Qualifications:

- High school diploma or equivalent preferred.
- Previous experience in a vehicle cleaning or maintenance role is a plus.
- Ability to operate cleaning equipment and tools safely and effectively.
- Strong attention to detail and commitment to maintaining high cleanliness standards.
- Basic knowledge of vehicle maintenance is beneficial but not required.
- Ability to work independently and as part of a team.
- Strong communication skills.

Physical Requirements:

- Ability to lift and carry up to 50 pounds.
- Comfortable working outdoors in various weather conditions.
- Ability to stand, bend, and kneel for extended periods.



HIGH VALLEY TRANSIT JOB DESCRIPTION – PROPOSED

Job Title: Strategic Sourcing Manager – Fleet

Reports To: Chief Operations Officer

Salary: \$75,000 – \$115,000

Department: Operations

Job Summary: The Strategic Sourcing Manager – Fleet is responsible for the administration, management, and compliance of High Valley Transit's fleet. This role ensures that all vehicles are maintained in optimal condition, NTD reporting is accurate, and all operations adhere to UDOT and FTA rules and regulations. Additionally, the Strategic Sourcing Manager – Fleet oversees hardware installation projects for each vehicle, ensuring timely and efficient execution. The Strategic Sourcing Manager – Fleet collaborates with the Shop Foreman to ensure parts are ordered, on-hand, and the necessary hardware and software packages are installed and functioning.

Key Responsibilities:

Fleet Administration and Management:

- Oversee the day-to-day administration of the transit fleet, including maintenance, repairs, inspections, and software updates
- Develop and implement fleet management Standard Operating Procedures (SOPs)
- Maintain detailed records of vehicle maintenance, inspections, and repairs

Grant Writing and Procurement:

- Oversee, coordinate, and write grant applications for various funding opportunities at the Federal and State levels
- Manage and review procurement efforts per UDOT and FTA standards as well as HVT internal policy
- Coordinate and execute grant projects based on awarded grant agreements

Compliance and Reporting:

- Ensure compliance with UDOT and FTA regulations and standards
- Prepare and submit accurate NDA reports in a timely manner
- Monitor regulatory changes and update fleet management practices accordingly

Technical Projects:

- Manage hardware installation projects for each vehicle, including scheduling and coordination
- Ensure all hardware installations meet safety and operational standards
- Collaborate with vendors and contractors to ensure timely completion of projects
- Coordinate with operations to ensure safe and effective vehicle updates and rollouts



- Ensure all installations and fleet projects adhere to procurement standards set forth by the FTA and UDOT
- Cross training various departments on IT fundamentals as well as general software and hardware troubleshooting

Budget and Inventory Management:

- Work with Chief Operations Officer (COO) to develop and manage the fleet budget, including forecasting and cost control
- Develop fleet replenishment and transition plans that align with local funding and grant opportunities
- Ensure assets are properly retired according to FTA standards
- Regularly monitor for funding opportunities at the state and federal level
- Monitor and manage inventory of spare parts and equipment
- Identify cost-saving opportunities without compromising safety or quality

Team Leadership and Development:

- Collaborate with and train fleet maintenance staff as it relates to special systems
- Foster a positive and productive work environment
- Conduct performance evaluations and provide feedback to team members
- Assist in the hiring and management of additional procurement or grant staff members
- Assist in the training of current staff in procurement policies

Safety and Risk Management:

- Implement and enforce safety protocols for fleet operations
- Conduct regular safety audits and risk assessments
- Address and resolve any safety issues promptly
- Coordinate regularly with Maintenance and Operations to ensure safety is the top priority

Work Environment:

- Combination of office and field work
- Occasional evening and weekend work may be required

Job Requirements:**Qualifications:**

- Bachelor's degree in Business Administration, Logistics, Transportation, or a related field
- Minimum of 5 years of experience in fleet management, preferably in a transit or transportation environment
- Minimum of 2 years of experience in procurement or grant writing
- Minimum of 2 years of project management and implementation
- Strong written communication skills
- Strong knowledge of UDOT and FTA regulations and compliance requirements
- Excellent organizational and project management skills



- Proficiency in fleet management software and tools
- Basic IT hardware literacy
- Strong analytical and problem-solving abilities
- Effective communication and interpersonal skills
- Valid driver's license and clean driving record

Physical Requirements:

- Ability to lift up to 50 pounds
- Ability to perform physical tasks related to vehicle inspections and maintenance



High Valley
TRANSIT

Chart of Positions January 2026			
Branch	Title	Existing	Proposed
Admin	Executive Director	1	
Finance	Finance Director	1	
Admin	Transportation Planner	1	
Admin	Business Data Analyst	1	
Admin	Admin Assistant	1	
Admin	Human Resources Director	1	
Admin	Chief Development Officer	1	
Admin	Payroll & Benefits Admin	1	
Admin	Accounts Payable Accountant	1	
Operations	Deputy Manager	1	
Operations	Information Technology Tech	1	
Operations	Maintenance Manager	1	
Operations	Maintenance Tech	11	
Operations	Fleet Manager Strategic Sourcing Manager - Fleet	1	
Operations	Wash Bay Attendant / Facilities Tech	5	1
Operations	Parts and Inventory Administrator		
Operations	Facilities Supervisor	1	
Operations	Compliance Specialist	1	
Operations	Facilities Director		
Operations	Janitorial	4	
Operations	Operator III	7	
Operations	Operator Trainer	2	
Operations	Operator II	70	
Operations	Operator 1	0	
Admin	Marketing/Social Media Coordinator		
Admin	Customer Relations Specialist		
Admin	ITS Administrator		
Admin	ITS Tech		
Admin	Grants & Procurement	1	
Customer Service	Rider Support Supervisor	1	
Customer Service	Rider Support Specialist		
Part-time/Contract			
Admin	Communications	1	
Admin	Valley Ride Coordinator	1	
Admin	IT Networking		
Operations	Facilities/Seasonal contracts		

STAFF REPORT

Date: June 18, 2026
To: Board of Trustees
From: Allie Shorkey, Human Resources Director
Subject: Adoption of the Privacy Program Policy

Action Requested

Discussion and possible adoption of a state required Privacy Program Policy.

Background

Effective March 27, 2025, Under the Utah Government Data Privacy Act (Title 63A-19), all governmental entities are required to initiate a privacy program, with full implementation required by January 1, 2027. Failure to adopt and implement a compliant privacy program may expose the District to legal liability and potential enforcement action under state law.

The Utah Governor's Office of Planning and Budget, through the Office of Data Privacy, developed a Privacy Program Policy Template (version 1.1) to assist governmental entities in meeting these requirements. HVT has drafted its Privacy Program Policy mirroring Summit County's Policy which used the state template as a foundation.

With Board approval, the Privacy Policy will be amended in High Valley Transit's Policies and Procedures.

Enclosed

HVT Privacy Program Policy, State of Utah Privacy Program Policy Template



HIGH VALLEY TRANSIT DISTRICT PRIVACY PROGRAM POLICY

1) Purpose: This policy serves to document High Valley Transit District's ("HVT") privacy program, which includes the HVT's policies, practices, and procedures for the processing of personal data in accordance with [Utah Code Section 63A-19-401](#) et seq. (as amended) and which aligns with the records management and data governance requirements provided in both Utah's Government Records Access and Management Act ("GRAMA") and the Division of Archives and Records Service and Management of Government Records statute ("DARS"). Where applicable, this policy will refer to a more specific or detailed policy, procedure, or guidance that addresses a particular practice that HVT has developed.

2) Guiding Principles: This policy consolidates privacy practices, outlines governance roles and responsibilities, and ensures compliance with generally applicable records management, data protection, and data privacy obligations. It is designed to safeguard individual privacy rights, promote transparency, maintain the integrity and security of personal data, and ensure accountability across HVT. This policy is meant to guide further alignment of HVT with the State Data Privacy Policy as detailed in [Utah Code Section 63A-19-101](#) et seq. (as amended).

3) Scope: This policy applies to all HVT employees involved in the management, creation, and maintenance of records or who have access to personal data as part of their job duties. This policy also applies to all contractors of HVT that process or have access to personal data as a part of the contractor's duties under an agreement with HVT pursuant to [Utah Code § 63A-19-401\(4\)](#).

4) Definitions: The following definitions apply for the purposes of this Policy:

- a) "At-risk Government Employee" has the same meaning as found in [Utah Code Section 63G-2-303](#) (as amended).
- b) "Classification," "classify," and their derivative forms mean determining whether a record series, record, or information within a record is public, private, controlled, protected, or exempt from disclosure under GRAMA.
- c) "Cookie" means technology that records a user's information and activity when the user accesses websites. Cookies are used by website owners, third parties, and sometimes threat actors to gather user data.
- d) "Data Breach" means— the unauthorized access, acquisition, disclosure, loss of access, or destruction of personal data held by a governmental entity, unless the governmental entity concludes, according to standards established by the Utah Cyber Center created in [Utah Code Section 63A-16-1101](#) (as amended), that there is a low probability that personal data has been compromised.
- e) "Designation," "designate," and their derivative forms mean indicating, based on a governmental entity's familiarity with a record series or based on a governmental entity's review of a reasonable sample of a record series, the primary classification that a majority of records in a record series would

be given if classified and the classification that other records typically present in the record series would be given if classified.

- f) "Device Fingerprinting" means collecting attributes of a user's device configurations to create a trackable profile for the device.
- g) "Individual" means a human being.
- h) "Key Logger" means "a program designed to record which keys are pressed on a computer keyboard..."
- i) "Personal Data" means information that is linked or can be reasonably linked to an identified individual or an identifiable individual such as:
 - j) First and last name;
 - k) Physical address;
 - l) Email address;
 - m) Telephone number;
 - n) Social Security number;
 - o) Credit card information;
 - p) Account Number;
 - q) Bank account information; or
 - r) Any combination of personal information that could be used to determine identity
- s) "Processing Activity" or "Processing Activities" means any operation or set of operations performed on personal data, including collection, recording, organization, structuring, storage, adaptation, alteration, access, retrieval, consultation, use, disclosure by transmission, transfer, dissemination, alignment, combination, restriction, erasure, or destruction.
- t) "Record(s)" means the same as that term is defined in GRAMA.
- u) "Record Series" means a group of records that may be treated as a unit for purposes of designation, description, management, or disposition.
- v) "Records Officer" means the individual or individuals appointed by the chief administrative officer of the HVT to work with state archives in the care, maintenance, scheduling, designation, classification, disposal, and preservation of records.
- w) "Schedule," "scheduling," and their derivative forms mean the process of specifying the length of time each Record series should be retained by HVT for administrative, legal, fiscal, or historical purposes and when each Record series should be transferred to Archives or destroyed.
- x) "State Archives" means the Utah Division of Archives and Records Service.

5) Governance:

a) Chief Administrative Officer ("CAO"):

- i. There is hereby established a Chief Administrative Officer or "CAO" for HVT. The CAO of HVT is the HVT Human Resources Director or their designee.
- ii. The designation of the CAO or any changes to the designation of the CAO shall be reported to State Archives within 30 days of designation.

- iii. The designation of, and responsibilities assigned to, the CAO shall be reviewed and confirmed by HVT on an annual basis.
- iv. The CAO shall have those duties as outlined in [Utah Code Section 63A-12-103](#).

b) Appointed Record Officers (“Record Officers”):

- i. The CAO shall appoint one or more individuals to serve as Records Officers in fulfilling the duties of working with State Archives and the Office of Data Privacy in the care, maintenance, scheduling, disposal, classification, designation, access, privacy, and preservation of Records.
- ii. The appointment of Records Officers shall be reported to State Archives within 30 days of the appointment.
- iii. If responsibility for the duties of appointed Records Officers is divided between more than one Record Officer, such specification shall be reported to State Archives along with the appointment.
- iv. The appointment of, and responsibilities assigned to, a Records Officer shall be reviewed and confirmed by the HVT on an annual basis.

6) Records Series:

- a) Each department and office of HVT shall create and maintain Records and Records Series in accordance with the requirements provided in DARS and GRAMA in addition to correlated guidance issued by State Archives and HVT’s Attorney’s Office.
- b) Each department and office of HVT shall appropriately designate and classify Records and Records Series in accordance with the requirements provided in DARS and GRAMA in addition to correlated guidance from the HVT’s Attorney’s Office.
- c) The CAO or their designee shall be responsible for submitting a proposed retention schedule for each type of material defined as a Record under GRAMA to State Archives for review and final approval by the State Records Management Committee (“RMC”).
- d) Upon approval by the RMC, HVT shall maintain and dispose of records in strict accordance with the approved retention schedule. In instances where the HVT has not received an approved retention schedule for a specific type of Record, the general retention schedule maintained by State Archives shall govern the retention and disposition of those Records.

e) Record Series Privacy Annotation:

- i. Each department and office of HVT shall perform a privacy annotation for each Record Series that contains Personal Data pursuant to [Utah Code Section 63A-19-401.1](#) (as amended).
- ii. Privacy annotations shall include:
 - a. an inventory of all types of Personal Data included in the Record Series;
 - b. a description of all purposes for which the department or office collects, keeps or uses the Personal Data;
 - c. a citation to the legal authority for collecting, keeping, or using the Personal Data; and

- d. the legal authority under which Personal Data is processed.
- iii. If a department or office determines that a Record Series does not contain Personal Data, the Privacy Annotation shall be limited to a statement indicating that the Record Series does not include Personal Data.
- iv. Privacy annotations shall be conducted and reported in accordance with additional requirements provided by State Archives via administrative rule.

7) Awareness & Training:

- a) The CAO of HVT shall ensure that all employees that have access to Personal Data as part of the employee's work duties complete a data privacy training program within 30 days after beginning employment and at least once in each calendar year.
- b) The CAO of HVT is responsible for monitoring completion of data privacy training by HVT's employees.
- c) In addition to the general privacy awareness training, departments and offices, after consultation with the CAO and HVT's Attorney's Office, may create and require employees to complete department-specific privacy training tailored to the unique privacy needs, practices, and requirements of the department or office.

d) Appointed Records Officer Training & Certification:

- i. The CAO of HVT shall ensure that, on an annual basis, all appointed Records Officers successfully complete online training on the provisions of GRAMA and obtain certification from State Archives in accordance with [Utah Code Section 63A-12-110](#) (as amended).
- ii. The CAO of HVT shall, on an annual basis, review and confirm the certification status of all appointed Records Officers.
- iii. Records Officers who handle GRAMA transparency responsibilities are required to complete the GRAMA transparency training and obtain certification from Archives in accordance with [Utah Code Section 63A-12-110](#).
- iv. Records Officers specializing in Records management or privacy are required to complete both records management and GRAMA transparency training, as well as obtain the corresponding certifications.

8) Identification and Inventory:

a) Inventorying:

- i. The CAO of HVT or their designee shall maintain a comprehensive inventory of:
 - 1. All IT systems that may process state or federal data which the state owns or is responsible for, using the standard process that Utah Division of Technology Services ("DTS") provides.
 - 2. All Records and Record Series that contain Personal Data and the types of Personal Data included in the Records and Record Series.
 - 3. All Processing Activities, the inventory of which shall include:

- a. Non-compliant Processing Activities—pursuant to the Government Data Privacy Act (“GDPA”)—that were implemented prior to May 1, 2025, and a prepared strategy for bringing the non-compliant Processing Activity into compliance by no later than July 1, 2027; and
- b. All Processing Activities implemented after May 1, 2025, with documentation confirming compliance status.

b) Information Technology Privacy Impact Assessment:

- i. The CAO shall ensure that HVT completes a Privacy Impact Assessment (“PIA”) for all IT systems that may process Personal Data prior to the initiation of data processing in the IT system as required under DTS Information Security Policy 5000-0002.
- ii. The CAO shall use the PIA template that is created and maintained by the State’s Chief Privacy Officer, and which is approved by the Chief Information Officer pursuant to DTS Information Security Policy 5000-0002.
- iii. The CAO shall maintain a copy of each completed assessment for a period of four years to provide audit documentation and ensure accountability in privacy practices.

9) Transparency:

a) Website Privacy Policy:

- i. The CAO of HVT or their designee shall create and maintain privacy policies on its websites as outlined in [Utah Code Section 63A-19-402.5](#) (as amended) and [Utah Admin Rule R895-8](#) (as amended).
 - ii. The CAO of HVT or their designee shall ensure that Personal Data related to a user of a HVT website is not collected unless said website complies with [Utah Code Section 63A-19-402.5](#) (as amended).
 - iii. The CAO of HVT or their designee shall ensure that all websites of HVT contain a privacy policy statement that discloses:
 - 1. The identity of the HVT website operator;
 - 2. How the HVT website operator may be contacted;
 - 3. The Personal Data collected by HVT;
 - 4. The practices related to disclosure of Personal Data collected by HVT and/or the HVT website operator; and
 - 5. The procedures, if any, by which a user may request:
 - a. Access to the user's Personal Data; and
 - b. Access to correct the user's Personal Data.
- a) A general description of the security measures in place to protect a user's Personal Data from unintended disclosure.

b) Privacy Notice:

- i. Employees shall only collect Personal Data from individuals if, on the day the Personal Data is collected, the HVT has provided a privacy notice to an individual asked to furnish Personal Data that complies with Utah Code Section 63G-2-601(2), Utah Code Section 63A-19-402 (as amended), or other governing law, as applicable.
- ii. Such a Personal Data request privacy notice shall generally include:
 - 1. the Record Series that the Personal Data will be included in;
 - 2. the reasons the person is asked to furnish the information;
 - 3. the intended purposes and uses of the information;
 - 4. the consequences for refusing to provide the information; and
 - 5. the classes of people and governmental entities that currently:
 - a. share the information with HVT; or
 - b. receive the information from HVT on a regular or contractual basis.

10) Individual Requests:

- a) The CAO of HVT or their designee shall ensure that HVT has established appropriate processes and procedures that facilitate compliance with applicable governing law for handling the following privacy requests of individuals:
 - i. Individual's requests to access their Personal Data;
 - ii. Individual's requests to amend or correct their Personal Data;
 - iii. Individual's requests for an explanation of the purposes and uses of their Personal Data; and
 - iv. At-risk Government Employee requests to restrict access to their Personal Data.
 - 1. The CAO of HVT or their designee shall ensure that HVT has established processes for public access requests to inspect or copy the HVT's Records, which are not requests from an individual to access their Personal Data.
 - 2. The CAO of HVT shall ensure that employees of HVT follow established business practices with respect to GRAMA.

11) Processing:

- a) Minimum Data Necessary:
 - i. The CAO of HVT shall ensure that all programs within the HVT obtain and process only the minimum amount of Personal Data reasonably necessary to efficiently achieve a specified purpose.
 - ii. The CAO of HVT shall ensure that all departments/offices within the HVT regularly review their data collection practices to ensure compliance with the data minimization requirement.
- b) Record and Data Sharing or Selling:
 - i. HVT departments and offices will only share or disclose Personal Data when there is appropriate legal authority. The sale of Personal Data is prohibited unless required by law.

- ii. Data sharing must comply with GRAMA or other governing laws and may include sharing with governmental entities, contractors, private providers, or researchers. Compliance with GRAMA or other governing law is contingent upon the purpose of sharing, the parties involved, and the nature of the Records.
 - iii. The CAO is required to report annually to the State's Chief Privacy Officer on Personal Data sharing and selling activities, including shared types of data, the legal basis for sharing, and the entities receiving this data.
 - iv. All contracts involving Personal Data must incorporate appropriate privacy protection terms. Written agreements for data sharing are recommended to ensure compliance with applicable laws and regulations.
- c) Retention & Disposition of Records Containing Personal Data:
- i. Employees shall maintain, archive, and dispose of Records—which includes all Personal Data—in accordance with an approved retention schedule as required in [Utah Code Section 63G-2-604](#) (as amended)
 - ii. Employees shall comply with all other applicable laws or regulations related to retention or disposition of specific Personal Data held by HVT or by a particular HVT department or office.

12) Information Security:

a) Incident Response:

- i. HVT adopts and follows the DTS Cybersecurity Incident Response Plan to manage and address all security incidents, including data breaches, and privacy violations.
- ii. Employees shall report all suspected security incidents, including non-IT incidents such as unauthorized access to physical records, to Utah's Enterprise Information Security Office ("EISO"). Any additional agency-specific response measures for non-IT incidents are the responsibility of the CAO to develop and implement as appropriate.
- iii. The CAO of HVT or their designee shall ensure compliance with all other applicable laws or regulations related to incident response and breach notification of specific Personal Data held by HVT.

b) Breach Notification:

- i. HVT is required to provide notice to an individual or the legal guardian of an individual, if the individual's Personal Data is affected by a data breach in accordance with [Utah Code Section 63A-19-406](#) (as amended).
- ii. HVT is required to notify the Utah Cyber Center and the state attorney general's office of a data breach affecting 500 or more individuals in accordance with [Utah Code Section 63A-19-405](#) (as amended). Any department or office that experiences a data breach affecting fewer than 500 individuals must create and report an internal incident report in accordance with [Utah Code Section 63A-19-405](#) (as amended). These requirements are in addition to any other reporting requirement that the department or office may be subject to.

- iii. The CAO of HVT, if subject to other breach notification requirements, such as those required for compliance with federal regulations, laws or other governing requirements (e.g., HIPAA or 42 CFR Part 2) are currently required to create and maintain their own department or office-specific breach notification policies and procedures that meet the requirements of the applicable governing laws and regulations.

13) Surveillance:

a) Covert Surveillance:

- i. Employees may not establish, maintain, or use undisclosed or covert surveillance of individuals unless permitted by law.
- ii. Employees are responsible for engaging with appropriate leadership for review—to include the HVT Attorney's Office where pertinent—of any activity that may be considered a type of surveillance.
- iii. The CAO of HVT shall ensure that surveillance activities are documented and that a PIA for the activity has been completed.

b) Cookies, Fingerprinting, Key Loggers, and Tracking Technologies:

- i. HVT is committed to transparency and privacy protection for individuals that visit any HVT website with regard to the use of any tracking technologies, including but not limited to Cookies, device fingerprinting, Key loggers, and other similar methods for monitoring or collecting information from website users.
- ii. Cookies: The use of Cookies on HVT websites and digital services must comply with applicable privacy and security policies. Cookies should be limited to essential operational purposes, and any use of tracking or third-party Cookies for analytics or similar functions must be disclosed clearly to users, with an option to consent where required by law.
- iii. Device fingerprinting: Device fingerprinting is prohibited unless explicitly authorized by the CAO or their designee and where the legal basis or appropriate justification for such processing is documented in a PIA. The purpose and extent of fingerprinting must be clearly defined, documented, and disclosed to users in a privacy notice or statement that complies with applicable legal requirements.
- iv. Key loggers: Key loggers are prohibited without specific authorization from the CAO or their designee and documented justification in the activity's PIA. Key loggers may only be used when there is a clearly defined operational need that complies with security standards and legal requirements, including appropriate user notice where required.
- v. Other tracking technologies: The use of other tracking technologies, such as web beacons, pixel tags, or similar tools, is prohibited unless explicitly authorized by the CAO or their designee, and the legal basis for such tracking is documented in a PIA. Disclosure of these technologies must be included in user-facing privacy statements, with user consent obtained when required by law.

- vi. User Notification and Consent: HVT must ensure users are informed about the use of tracking technologies. A clear website privacy statement must explain the types of data collected, the purpose of the tracking, and how users can manage their preferences or consent. Any updates to tracking practices must be promptly reflected in the privacy statement.
- vii. Data Security and Retention: Data collected through authorized tracking technologies must be securely stored, with access limited to authorized personnel. Retention of this data must align with approved retention schedules, and the data should only be retained as long as necessary for the defined operational purpose.

14) References/Authority:

- a) Division of Archives and Records Services (DARS) at Utah Code § 63A-12-100 *et seq.*; Government Data Privacy Act (GDPA) at Utah Code § 63A-19-101 *et seq.*;
- b) Government Records Access and Management Act (GRAMA) at Utah Code § 63G-2-101 *et seq.*;
- c) Management of Records and Access to Records at Utah Administrative Code R13-2;
- d) Division of Technology Services (DTS) Information Security Policy 5000-0002.

PRIVACY PROGRAM POLICY TEMPLATE



**Utah Office of
Data Privacy**

DISCLAIMER

This template is provided by the Utah Office of Data Privacy (ODP) as a resource to assist governmental entities. This template is intended to serve as general guidance and a foundational structure only. Governmental entities are responsible for reviewing, customizing, and adapting this template to ensure compliance with applicable laws, regulations, policies, and organizational needs.

The ODP makes no representations or warranties, express or implied, regarding the legal sufficiency or suitability of this template for any specific purpose. By using this template, governmental entities acknowledge and agree that the ODP is not liable for the use or modification of this template. This template is not legal advice and is not a substitute for consultation with legal counsel. Entities should consult with their own legal counsel before finalizing or executing a document based on this template.

GUIDANCE

A few points of guidance to help an entity use the privacy program policy template:

CHIEF ADMINISTRATIVE OFFICER (CAO)

Much of the responsibility for the requirements identified in this policy template is placed on CAOs. It is likely that CAOs will delegate these responsibilities and then oversee things. Assigning responsibility at a higher level, e.g., division, may make delegation more clear, and may clarify who will carry out the tasks that are written into procedures.

FORMAT

The template policy should be reformatted to match the format and style of the entity's other policies. Entities should determine whether there is an established process and procedure for creating and adopting policies.

ENTITY BUSINESS DECISIONS

Entities will need to account for processes and procedures that are not governed by law but are business related decisions. Entities will need to determine who needs to be involved, who is authorized to make decisions, and how to appropriately engage with legal counsel.

DEFINITIONS

Some definitions are included in the template, but the entity should ensure the definitions align with any others that may be specific to a particular entity. Entities are encouraged to add, refine, and remove definitions as part of creating their own unique privacy program policy.

ENTITY LEVEL

Entities need to ensure that the correct organization level is identified throughout the document.

OFFICE OF DATA PRIVACY

The Office of Data Privacy can be contacted as a helpful resource for some questions, but many issues will likely need to be resolved by an entity internally.

[ENTITY HEADER]

[DEPARTMENT NAME] Privacy Program Policy

[POLICY NUMBER]

Effective Date:

Revised Date:

Sunset/Next Review Due:

Approved By:

REFERENCES/AUTHORITY:

Division of Archives and Records Services (DARS) at [Utah Code § 63A-12-100 et seq.](#);

Government Data Privacy Act (GDPA) at [Utah Code § 63A-19-101 et seq.](#);

Government Records Access and Management Act (GRAMA) at [Utah Code § 63G-2-101 et seq.](#);
and

[Management of Records and Access to Records at [Utah Administrative Code R13-2.](#)]

[Division of Technology Services (DTS) [Information Security Policy 5000-0002](#)]

[...]

1. PURPOSE

This policy serves to document [Department's] privacy program, which includes [Department's] policies, practices, and procedures for the processing of personal data in accordance with [Utah Code § 63A-19-401\(2\)\(a\)](#), and which aligns with the records management and data governance requirements provided in both GRAMA and DARS. Where applicable, this policy will refer to a more specific or detailed policy, procedure, or guidance that addresses a particular practice that [Department] has developed.

2. GUIDING PRINCIPLES

This policy consolidates privacy practices, outlines governance roles and responsibilities, and ensures compliance with generally applicable records management, data protection, and data privacy obligations. It is designed to safeguard individual privacy rights, promote transparency, maintain the integrity and security of personal data, and ensure accountability across the [Department]. This policy is meant to guide further alignment of [Department] with the State Data Privacy Policy as detailed in [Utah Code § 63A-19-102](#).

3. SCOPE

This policy applies to all [Department] employees involved in the management, creation, and maintenance of records or who have access to personal data as part of their job duties. This policy also applies to all contractors of the [Department] that process or have access to personal data as a part of the contractor's duties under an agreement with the [Department] pursuant to [Utah Code § 63A-19-401\(4\)](#).

Processing activities implemented on or after May 1, 2024, must be compliant with this policy prior to implementation. Each [division] must develop a strategy to inventory and bring pre-existing activities into compliance with this policy by January 1, 2027.¹

4. DEFINITIONS

"Classification," "classify," and their derivative forms mean determining whether a record series, record, or information within a record is public, private, controlled, protected, or exempt from disclosure under [Subsection § 63G-2-201\(3\)\(b\)](#).²

"Cookie" means "Technology that records a user's information and activity when the user accesses websites. Cookies are used by website owners, third parties, and sometimes threat actors to gather user data."³

"Data breach" means— the unauthorized access, acquisition, disclosure, loss of access, or destruction of personal data held by a governmental entity, unless the governmental entity concludes, according to standards established by the Cyber Center, that there is a low probability that personal data has been compromised."⁴

"Designation," "designate," and their derivative forms mean indicating, based on a governmental entity's familiarity with a record series or based on a governmental entity's review of a reasonable sample of a record series, the primary classification that a majority of records in a record series would be given if classified and the classification that other records typically present in the record series would be given if classified.⁵

"Device fingerprinting" means collecting attributes of a user's device configurations to create a trackable profile for the device.

"Individual" means a human being.⁶

"Key logger" means "a program designed to record which keys are pressed on a computer keyboard..."⁷

“Personal data” means information that is linked or can be reasonably linked to an identified individual or an identifiable individual.⁸

“Processing activity” means any operation or set of operations performed on personal data, including collection, recording, organization, structuring, storage, adaptation, alteration, access, retrieval, consultation, use, disclosure by transmission, transfer, dissemination, alignment, combination, restriction, erasure, or destruction.⁹

“Record” means the same as that term is defined at [Utah Code § 63G-2-103\(25\)](#).¹⁰

“Record series” means a group of records that may be treated as a unit for purposes of designation, description, management, or disposition.¹¹

“Records officer” means the individual appointed by the chief administrative officer of each governmental entity, or the political subdivision to work with state archives in the care, maintenance, scheduling, designation, classification, disposal, and preservation of records.¹²

“Schedule,” “scheduling,” and their derivative forms mean the process of specifying the length of time each record series should be retained by a governmental entity for administrative, legal, fiscal, or historical purposes and when each record series should be transferred to the state archives or destroyed.¹³

5. GOVERNANCE

5.1. Chief Administrative Officers (CAOs)

- A. The Executive Director shall designate one or more individuals to serve as a chief administrative officer (CAO) of the [Department] in fulfilling the duties outlined in [Utah Code § 63A-12-103](#).
- B. The Executive Director may assign responsibility for the duties outlined in [Utah Code § 63A-12-103](#) to one, or among several, CAOs as the Executive Director sees fit.
- C. The designation of the CAO(s) shall be reported to the Utah Division of Archives and Records Services (Archives) within 30 days of the designation.
- D. If responsibility for the duties outlined in [Utah Code § 63A-12-103](#) are divided between more than one CAO, such specification should be reported to Archives along with the designation.

- E. The designation of, and responsibilities assigned to, a CAO shall be reviewed and confirmed by the [Department] on an annual basis.

5.2. Appointed Records Officers (AROs)

- A. Designated CAO(s) shall appoint one or more individuals to serve as records officers in fulfilling the duties of working with Archives and the Office of Data Privacy in the care, maintenance, scheduling, disposal, classification, designation, access, privacy, and preservation of records.¹⁴
- B. A designated CAO may assign responsibility for the duties of appointed records officers to one, or among several, officers as the CAO deems appropriate.
- C. The appointment of records officers shall be reported to Archives within 30 days of the appointment.
- D. If responsibility for the duties of appointed records officers are divided between more than one officer, such specification should be reported to Archives along with the appointment.
- E. The appointment of, and responsibilities assigned to, a records officer shall be reviewed and confirmed by the [Department] on an annual basis.

6. RECORDS SERIES

6.1. Records and Records Series

- A. Each [division of the Department] shall create and maintain records and records series in accordance with the requirements provided in DARS and GRAMA in addition to correlated guidance issued by Archives.
- B. Each [division of the Department] shall appropriately designate and classify records and records series in accordance with the requirements provided in DARS and GRAMA.
- C. CAO(s) shall be responsible for submitting a proposed retention schedule for each type of material defined as a record under GRAMA to the state archivist for review and final approval by the Records Management Committee (RMC).
- D. Upon approval by the RMC, [Department] shall maintain and dispose of records in strict accordance with the approved retention schedule. In instances where [Department] has

not received an approved retention schedule for a specific type of record, the general retention schedule maintained by the state archivist shall govern the retention and disposition of those records.

6.2. Record Series Privacy Annotation

- A. Each [division of the Department] shall perform a privacy annotation for each record series that contains personal data pursuant to [Utah Code § 63A-12-115](#).
- B. Privacy annotations shall include:
 - a. the legal authority under which personal data is processed;
 - b. the purposes and uses for the personal data; and
 - c. the types of personal data that may be processed within the record series.
- C. Privacy annotations shall be conducted and reported in accordance with additional requirements provided by Archives via administrative rule.

7. AWARENESS & TRAINING

7.1. Departmental Data Privacy Training

- A. The CAO of [each division of the Department] shall ensure that all employees that have access to personal data as part of the employee's work duties complete a data privacy training program within 30 days after beginning employment and at least once in each calendar year.
- B. The CAO of [each division of the Department] is responsible for monitoring completion of data privacy training by the [Department's] employees.

7.2. Agency-Specific Training

- A. In addition to the general privacy awareness training, agencies may create and require employees to complete agency-specific privacy training tailored to the unique privacy needs, practices, and requirements of the agency.

7.3. Appointed Records Officer Training and Certification

- A. The CAO of [each division of the Department] shall ensure that, on an annual basis, all appointed records officers successfully complete online training on the provisions of

GRAMA and obtain certification from Archives in accordance with [Utah Code § 63A-12-110](#).

- B. The CAO of [each division of the Department] shall, on an annual basis, review and confirm the certification status of all appointed records officers.
- C. GRAMA Access AROs: AROs who handle GRAMA transparency responsibilities are required to complete the GRAMA transparency training and obtain certification from Archives in accordance with [Utah Code § 63A-12-110](#).
- D. Records Management and Privacy AROs: AROs specializing in records management or privacy are required to complete both records management and GRAMA transparency training, as well as obtain the corresponding certifications.

8. IDENTIFY

8.1. Inventorying

- A. The CAO of [division of the Department] shall maintain a comprehensive inventory of:
 - a. All IT systems that may process state or federal data which the state owns or is responsible for, using the standard process that DTS provides.¹⁵
 - b. All records and record series that contain personal data and the types of personal data included in the records and record series.¹⁶
 - c. All processing activities, the inventory of which shall include:
 - i. Non-compliant processing activities—pursuant to the GDPR—that were implemented prior to May 1, 2024, and a prepared strategy for bringing the non-compliant processing activity into compliance by no later than January 1, 2027;¹⁷ and
 - ii. All processing activities implemented after May 1, 2024, with documentation confirming compliance status.

8.2. Information Technology Privacy Impact Assessment

- A. The CAO [of each division of the Department] shall ensure that the division completes a Privacy Impact Assessment (PIA) for all IT systems that may process personal data prior

to the initiation of data processing in the IT system as required under [DTS Information Security Policy 5000-0002](#).

- B. The responsible CAO shall use the PIA template that is created and maintained by the Chief Privacy Officer and which is approved by the Chief Information Officer pursuant to [DTS Information Security Policy 5000-0002](#).
- C. CAOs must maintain a copy of each completed assessment for a period of four years to provide audit documentation and ensure accountability in privacy practices.

9. TRANSPARENCY

9.1. Website Privacy Policy

- A. The CAO [of each division of the Department] shall create and maintain privacy policies on their websites as outlined in [Utah Code § 63D-2-103](#) and [Utah Admin. Code R895-8](#).
- B. The CAO [of each division of the Department] shall ensure that personal data related to a user of a [division's] website is not collected unless the [division's] website complies with [Utah Code § 63D-2-103\(2\)](#).
- C. The CAO [of each division of the Department] shall ensure that all websites of the [division] contain a privacy policy statement that discloses:
 - a. The identity of the governmental website operator;
 - b. How the governmental website operator may be contacted;
 - c. The personal data collected by the governmental entity;
 - d. The practices related to disclosure of personal data collected by the governmental entity and/or the governmental website operator; and
 - e. The procedures, if any, by which a user of a governmental entity may request:
 - i. Access to the user's personal data; and
 - ii. Access to correct the user's personal data.
 - f. A general description of the security measures in place to protect a user's personal data from unintended disclosure.

9.2. Privacy Notice

- A. Employees shall only collect personal data from individuals if, on the day the personal data is collected, the [Department] has provided a privacy notice to an individual asked

to furnish personal data that complies with Utah Code §§ [63G-2-601\(2\)](#), [63A-19-402](#), [63D-2-103\(2\)-\(3\)](#), or other governing law, as applicable.

- B. Such a personal data request privacy notice shall generally include¹⁸:
- a. the record series that the personal data will be included in;
 - b. the reasons the person is asked to furnish the information;
 - c. the intended purposes and uses of the information;
 - d. the consequences for refusing to provide the information; and
 - e. the classes of persons and entities that currently:
 - i. share the information with the [Department]; or
 - ii. receive the information from the [Department] on a regular or contractual basis.

10. INDIVIDUAL REQUESTS

- A. The CAO [of each division of the Department] shall ensure that the [division] has established appropriate processes and procedures that facilitate compliance with applicable governing law for handling the following privacy requests of individuals:
- a. Individual's requests to access their personal data;
 - b. Individual's requests to amend or correct their personal data;
 - c. Individual's requests for an explanation of the purposes and uses of their personal data; and
 - d. At-risk governmental employee requests to restrict access to their personal data.
- B. The CAO [of each division of the Department] shall ensure that the [division] has established processes for public access requests to inspect or copy the [Department's] records, which are not requests from an individual to access their personal data.¹⁹
- C. The CAO [of each division of the Department] shall ensure that employees of the [division] follow established business practices with respect to GRAMA.²⁰

11. PROCESSING

11.1. Minimum Data Necessary

- A. The CAO [of each division of the Department] shall ensure that all programs within the [division] obtain and process only the minimum amount of personal data reasonably necessary to efficiently achieve a specified purpose.²¹
- B. The CAO [of each division of the Department] shall ensure that all programs within the [division] regularly review their data collection practices to ensure compliance with the data minimization requirement.

11.2. Record and Data Sharing or Selling Policy

- A. [Department Name] will only share or disclose personal data when there is appropriate legal authority. The sale of personal data is prohibited unless required by law.
- B. Data sharing must comply with GRAMA or other governing law and may include sharing with governmental entities, contractors, private providers, or researchers. Compliance with GRAMA or other governing law is contingent upon the purpose of the sharing, the parties involved, and the nature of the records.
- C. The CAO is required to report annually to the Chief Privacy Officer on personal data sharing and selling activities, including types of data shared, the legal basis for sharing, and the entities receiving this data.
- D. All contracts involving personal data must incorporate appropriate privacy protection terms. Written agreements for data sharing are recommended to ensure compliance with applicable laws and regulations.

11.3. Retention and Disposition of Records Containing Personal Data

- A. Employees shall maintain, archive, and dispose of records—which includes all personal data—in accordance with an approved retention schedule.²²
- B. Employees shall comply with all other applicable laws or regulations related to retention or disposition of specific personal data held by the [Department] or by a particular operating unit or program of the [Department].

12. INFORMATION SECURITY

12.1. Incident Response

- A. [Department] adopts and follows the DTS Cybersecurity Incident Response Plan to manage and address all security incidents, including data breaches, and privacy violations.
- B. Employees shall report all suspected security incidents, including non-IT incidents such as unauthorized access to physical records, to the Enterprise Information Security Office (EISO). Any additional agency-specific response measures for non-IT incidents are the responsibility of the CAO [of each division of the Department] to develop and implement as appropriate.
- C. The CAO [of each division of the Department] shall ensure compliance with all other applicable laws or regulations related to incident response and breach notification of specific personal data held by the [Department].

12.2. Breach Notification

- A. The [Department] is required to provide notice to an individual or the legal guardian of an individual, if the individual's personal data is affected by a data breach in accordance with [Utah Code § 63A-19-406](#).²³
- B. The [Department] is required to notify the Cyber Center and the state attorney general's office of a data breach affecting 500 or more individuals in accordance with [Utah Code § 63A-19-405](#). [Divisions] that experience a data breach affecting fewer than 500 individuals must create and report an internal incident report in accordance with [Utah Code § 63A-19-405\(5\)](#). These requirements are in addition to any other reporting requirement that the [division] may be subject to.
- C. The CAO [of each division of the Department] that is subject to other breach notification requirements, such as those required for compliance with federal regulations, laws or other governing requirements (e.g., HIPAA or 42 CFR Part 2) are currently required to create and maintain their own [division] specific breach notification policies and procedures that meet the requirements of the applicable governing laws and regulations.

13. SURVEILLANCE

13.1. Covert Surveillance

- A. Employees may not establish, maintain, or use undisclosed or covert surveillance of individuals unless permitted by law.²⁴

- B. Employees are responsible for engaging with appropriate leadership for review—to include legal counsel where pertinent—of any activity that may be considered a type of surveillance.
- C. The CAO [of each division of the Department] shall ensure that surveillance activities are documented and that a PIA for the activity has been completed.

13.2. Cookies, Fingerprinting, Key Loggers, and Tracking Technologies

[Department] is committed to transparency and privacy protection for individuals that visit a website of the [Department] with regard to the use of any tracking technologies, including but not limited to cookies, device fingerprinting, key loggers, and other similar methods for monitoring or collecting information from website users.

A. Cookies

The use of cookies on [Department] websites and digital services must comply with applicable privacy and security policies. Cookies should be limited to essential operational purposes, and any use of tracking or third-party cookies for analytics or similar functions must be disclosed clearly to users, with an option to consent where required by law.

B. Device Fingerprinting

Device fingerprinting is prohibited unless explicitly authorized by the CAO and where the legal basis or appropriate justification for such processing is documented in a privacy impact assessment. The purpose and extent of fingerprinting must be clearly defined, documented, and disclosed to users in a privacy notice or statement that complies with applicable legal requirements.

C. Key Loggers

Key loggers are prohibited without specific authorization from the CAO and documented justification in the activity's PIA. Key loggers may only be used when there is a clearly defined operational need that complies with security standards and legal requirements, including appropriate user notice where required.

D. Other Tracking Technologies

The use of other tracking technologies, such as web beacons, pixel tags, or similar tools, is prohibited unless explicitly authorized by the CAO, and the legal basis for such tracking is documented in a PIA. Disclosure of these technologies must be included in user-facing privacy statements, with user consent obtained when required by law.

E. User Notification and Consent

[Department] must ensure users are informed about the use of tracking technologies. A clear website privacy statement must explain the types of data collected, the purpose of the tracking, and how users can manage their preferences or consent. Any updates to tracking practices must be promptly reflected in the privacy statement.

F. Data Security and Retention

Data collected through authorized tracking technologies must be securely stored, with access limited to authorized personnel. Retention of this data must align with approved retention schedules, and the data should only be retained as long as necessary for the defined operational purpose.

14. RELATED DOCUMENTS

- [Department of Government Operations Internal Policy 01. Code of Conduct. Section 3.2 Managing Records and Information.]
- [DTS Cybersecurity Incident Response Plan]
- [Dept. of Government Operations Internal Policy 01.]
- [Department policy on handling public records requests under GRAMA]
- [...]

¹ [Utah Code § 63A-19-401\(2\)\(e\).](#)

² [Utah Code § 63G-2-103\(3\)](#)

³ Cybersecurity & Infrastructure Security Agency, Project Upskill Glossary. Last visited 1/14/2025 at: <https://www.cisa.gov/resources-tools/resources/project-upskill-glossary>

⁴ Utah Code § 63A-19-101(4)

⁵ [Utah Code § 63G-2-103\(7\)](#)

⁶ [Utah Code § 63G-2-103\(13\)](#)

⁷ National Institute of Standards and Technology, Computer Security Resource Center, Glossary. Last visited 1/14/2025, at:

https://csrc.nist.gov/glossary/term/key_logger#:~:text=Definitions%3A,NIST%20SP%20800%2D82r3

⁸ [Utah Code § 63A-19-101\(13\)](#)

⁹ [Utah Code § 63A-19-101\(14\)](#)

¹⁰ Only the citation to the definition of “record” is provided here due to the length of the definition.

¹¹ [Utah Code § 63G-2-103\(26\)](#)

¹² [Utah Code § 63G-2-103\(27\)](#)

¹³ [Utah Code § 63G-2-103\(28\)](#)

¹⁴ [Utah Code § 63A-12-103\(2\)](#)

¹⁵ DTS [Information Security Policy 5000-0002](#), section 2.4.2.1

¹⁶ Utah Code §§ [63A-12-104](#) and [63A-12-115](#)

¹⁷ [Utah Code § 63A-19-401](#)

¹⁸ Utah Code §§ [63G-2-601\(2\)](#) and [63A-19-402](#).

¹⁹ This is likely detailed in a specific Department policy.

²⁰ Dept. of Government Operations Internal Policy 01. Code of Conduct. Section 3.2 Managing Records and Information.

²¹ [Utah Code § 63A-19-401\(2\)\(c\).](#)

²² Utah Code §§ [63G-2-604\(1\)\(b\)](#) and [63A-19-404](#).

²³ [Utah Code § 63A-19-401\(2\)\(b\).](#)

²⁴ [Utah Code § 63A-19-401\(2\)\(f\).](#)



STAFF REPORT

Date: June 12, 2026
To: Board of Trustees
From: Caroline Rodriguez, Executive Director
Subject: Amendments to Master Services Agreement

Action Requested

Discussion and possible approval of Amendment #1 – Wasatch County and Amendment #2 – Summit County to the Master Services Agreement between High Valley Transit and River North.

Background

The purpose of the amendments is to exercise the first of three annual extensions outlined within our existing contracts with River North. June 2026 - June 2027). All other terms, including pricing, remain unchanged.

Amendment # 1
to the
Amended and Restated Transit as-a-Service (TAAS) Service Order
Wasatch County

River North Transit LLC, a Delaware limited liability company qualified to do business within the State of Utah (“**River North**”) and High Valley Transit District, a body corporate and politic of the State of Utah (“**Customer**” and, together with River North, the “**Parties**”) have entered into that certain service order titled Amended and Restated Transit as-a-Service (TAAS) Service Order Wasatch County, dated December 1, 2024 (the “**Order**”). Upon execution of this Amendment #1 (the “**Amendment**”), the Parties agree to modify the Agreement as follows:

- 1. **Extension.** The Parties agree to exercise the first of three annual extensions documented in Section 3 of the order, extending the contract term to June 30, 2027. The fees for the extended term are documented in Section 4 of the Order.

Conflicts, Use of Terms, Governing Law. Capitalized terms used but not defined herein have the meanings set forth in the Agreement. Except as expressly provided herein, the terms and conditions of the Agreement remain unchanged. This Amendment #1 will be governed by the same law as the Agreement and is effective as of June 1, 2026.

By signing below, each of the Parties acknowledge and agree to the foregoing.

RIVER NORTH TRANSIT LLC Signed by: Mike Vaccarino A57DDE11B395448...	CUSTOMER: HIGH VALLEY TRANSIT DISTRICT
Authorized Signature Mike Vaccarino	Authorized Signature Caroline Rodriguez
Printed Name Manager	Executive Director Title
5/5/2026 Date Signed	Date Signed

APPROVED AS TO FORM:

Ryan P.C. Stack
Deputy County Attorney

Amendment # 2
to the
Amended and Restated Transit as-a-Service (TAAS) Service Order
Summit County

River North Transit LLC, a Delaware limited liability company qualified to do business within the State of Utah (“**River North**”) and High Valley Transit District, a body corporate and politic of the State of Utah (“**Customer**” and, together with River North, the “**Parties**”) have entered into that certain service order titled Amended and Restated Transit as-a-Service (TAAS) Service Order Summit County, dated December 1, 2024 and subsequently amended by the Amendment #1 to the Amendment and Restated Transit-as-a-Service (TAAS) Service Order Summit County, dated June 1, 2025 (together the “**Order**”). Upon execution of this Amendment #2 (the “**Amendment**”), the Parties agree to modify the Agreement as follows:

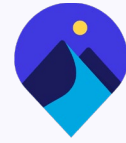
- 1. **Extension.** The Parties agree to exercise the first of three annual extensions documented in Section 5 of the Order, extending the contract term to June 30, 2027. The fees for the extended term are documented in Section 6 of the Order.

Conflicts, Use of Terms, Governing Law. Capitalized terms used but not defined herein have the meanings set forth in the Agreement. Except as expressly provided herein, the terms and conditions of the Agreement remain unchanged. This Amendment #2 will be governed by the same law as the Agreement and is effective as of June 1, 2026.
By signing below, each of the Parties acknowledge and agree to the foregoing.

RIVER NORTH TRANSIT LLC Signed by: Mike Vaccarino A57DDE11B395448... Authorized Signature Mike Vaccarino Printed Name Manager Title 5/5/2026 Date Signed	CUSTOMER: HIGH VALLEY TRANSIT DISTRICT Authorized Signature Caroline Rodriguez Executive Director Title Date Signed
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APPROVED AS TO FORM:

Ryan P.C. Stack
Deputy County Attorney

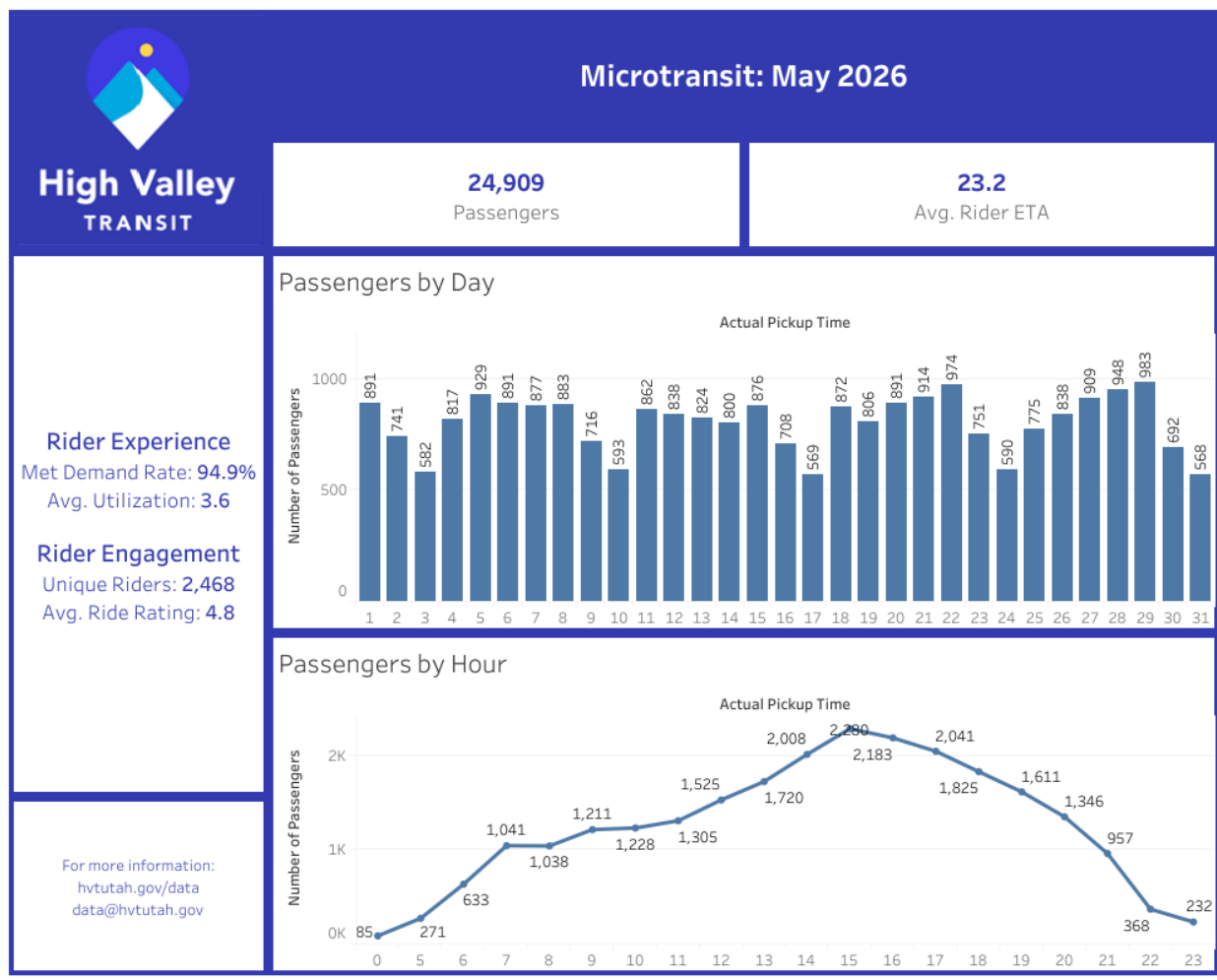


High Valley
TRANSIT

STAFF REPORT

Date: 06/18/2026
To: High Valley Transit District Board of Trustees
From: Ian Gilbert, Data & Performance Analyst
Subject: Ridership & Performance Update

Microtransit





High Valley
TRANSIT

Summit Microtransit: May 2026

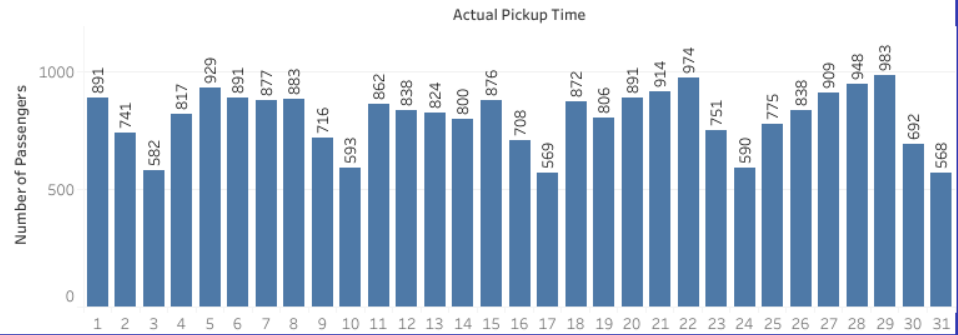
11,813
Passengers

18.1
Avg. Rider ETA

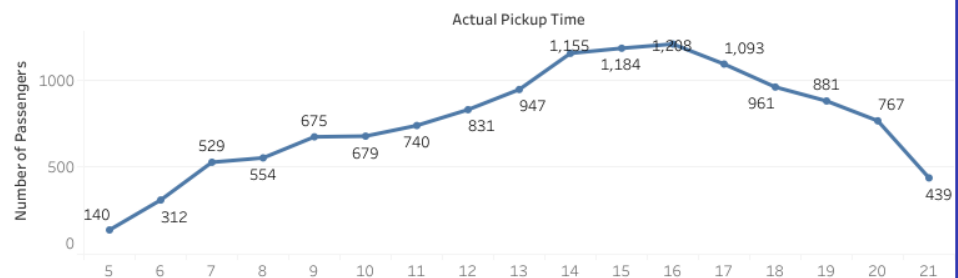
Rider Experience
Met Demand Rate: 96.3%
Avg. Utilization: 2.9

Rider Engagement
Unique Riders: 1,253
Avg. Ride Rating: 4.9

Passengers by Day



Passengers by Hour





High Valley
TRANSIT

Wasatch Microtransit: May 2026

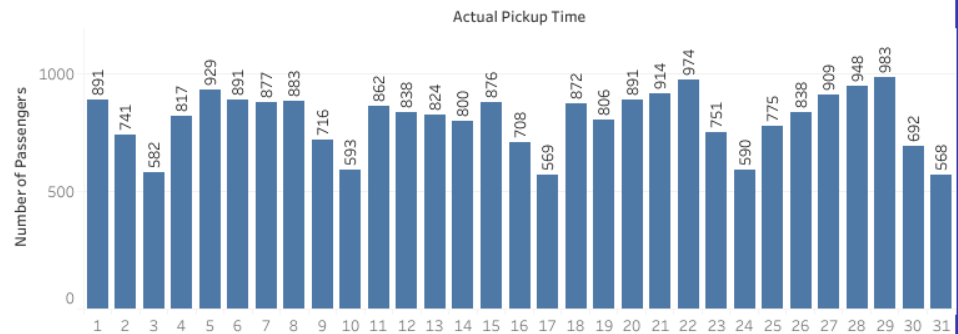
13,096
Passengers

27.1
Avg. Rider ETA

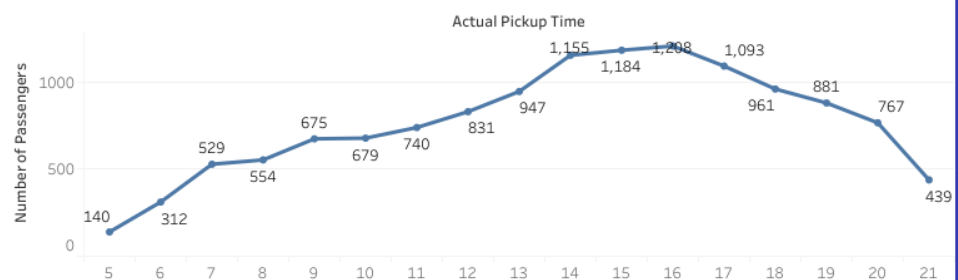
Rider Experience
Met Demand Rate: 93.7%
Avg. Utilization: 4.5

Rider Engagement
Unique Riders: 1,246
Avg. Ride Rating: 4.8

Passengers by Day



Passengers by Hour





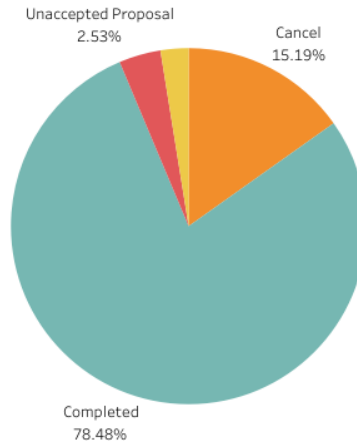
High Valley
TRANSIT

NEMT Ridership, May 2026

Average Ride Distance

6.66 miles

NEMT Pie

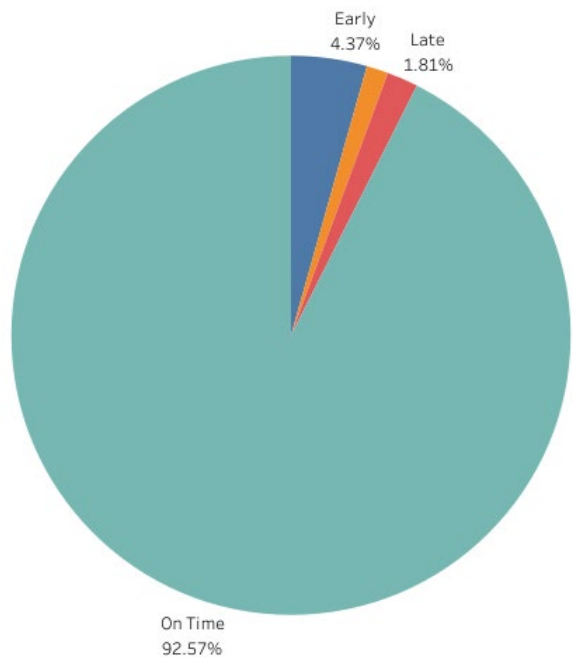
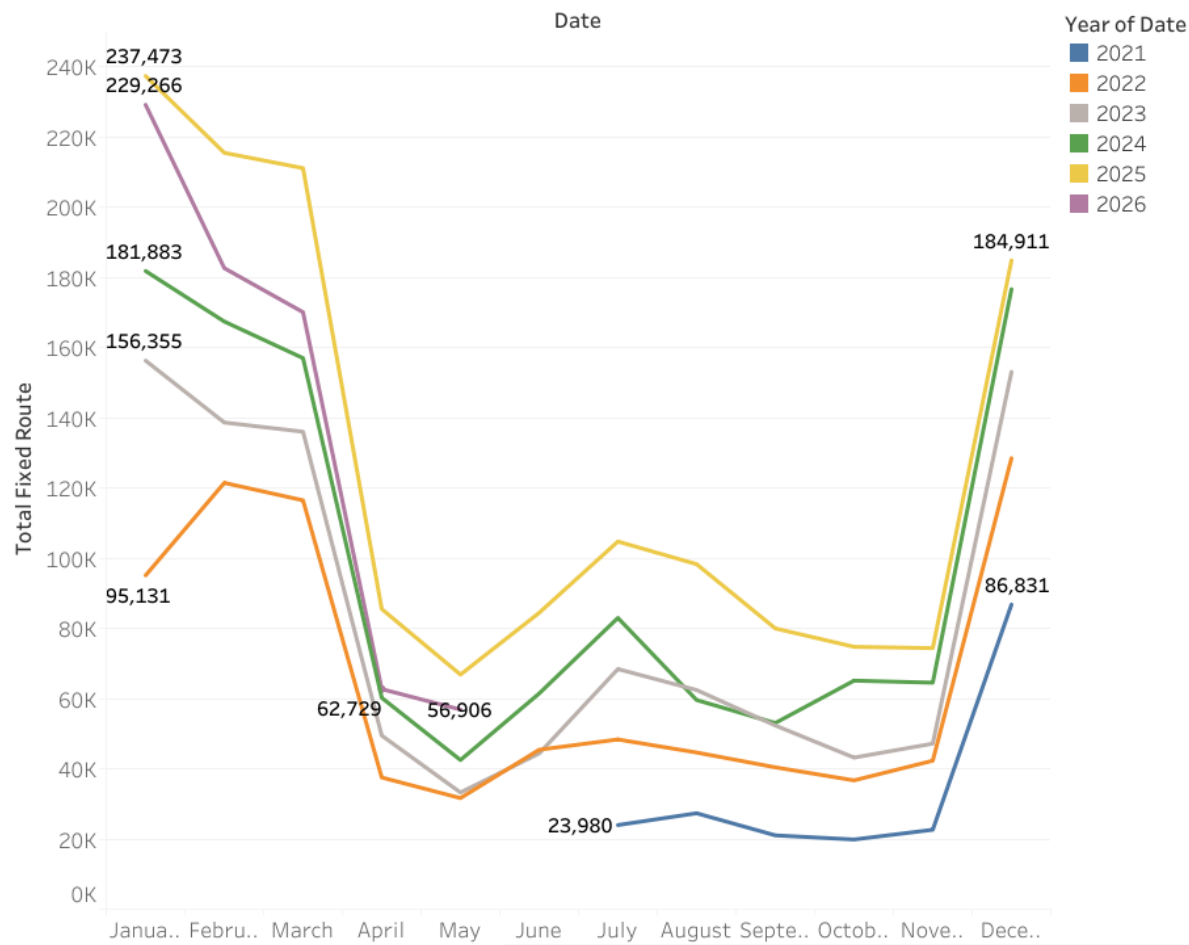


NEMT Requests

Request Status	
Completed	62
Cancel	12
No Show	3
Unaccepted Proposal	2
Grand Total	79

Fixed Route

Total Fixed Route Growth Comparison



Fixed Route Trends

Route	# 2025	# 2026	% Change
101 Spiro	21,724	19,380	-10.79%
102 Gateway	1,323	852	-35.60%
103 KJ Circulator	2,372	1,793	-24.41%
104 Bitner	9,098	3,912	-57.00%
105 Canyons	2,504	2,524	0.80%
106 Wasatch Connect	3,491	3,081	-11.74%
107 PC-SLC Connect	3,019	4,282	41.84%
108 Silver Creek	5,305	6,102	15.02%
10X High Line	18,025	14,980	-16.89%
FR Total	66,861	56,906	-14.89%
Wasatch	12,928	13,096	1.30%
Summit	10,183	11,813	16.01%
Micro Total	23,111	24,909	7.78%

New Data Reporting Alert!

The following tables were created using forecasting algorithms trained on our own fixed route data. Two separate algorithms predicted steady increases through 2027 at the highest confidence bound, and data on par with 2025 at the lowest bound (Figure1A, Figure 2).

- Figure 1B shows predicted yearly trends and an average seasonality trend.
- Micro ridership has increased year-over-year. Both zones saw increased ridership.

Figure 1A: Predicted Ridership Growth in HVT Fixed Route

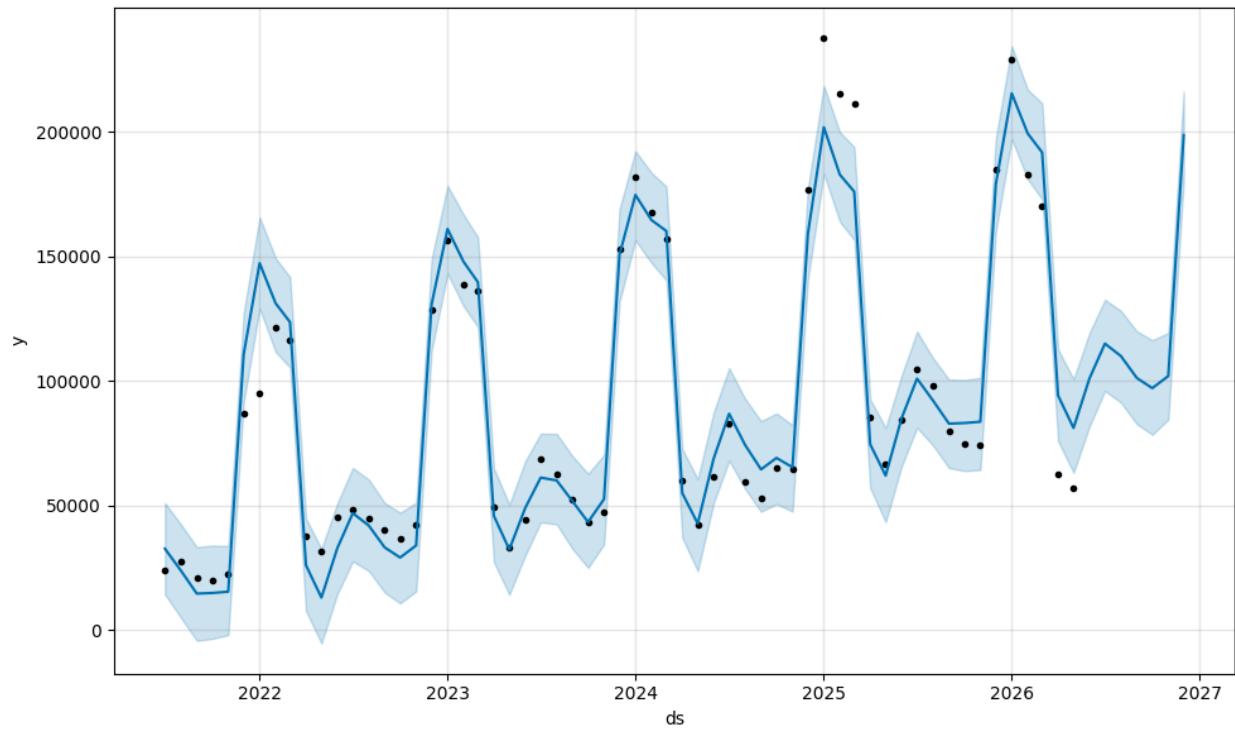


Figure 1B: Yearly Trends and Average Seasonality Trends

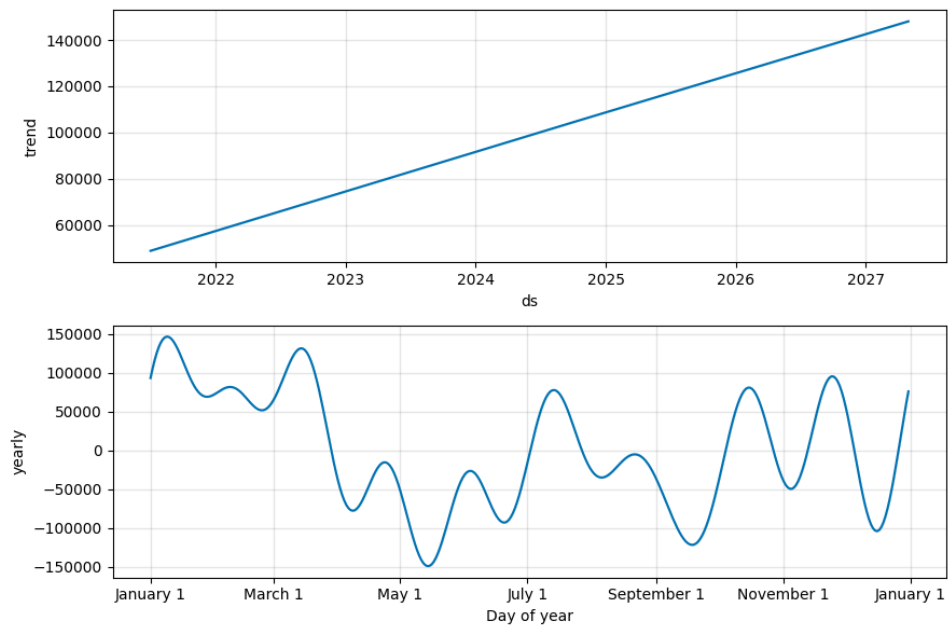


Figure 2: (alternative algo):_Predicted Ridership Growth in HVT Fixed Route

