



**Utah Office of
Data Privacy**

State of Connecticut General Assembly

AI Working Group Presentation

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Chief Privacy Officer
Utah Office of Data Privacy

2020



**First Legal-Services
Regulatory Sandbox**

FIRST IN NATION

The nation's first legal-services regulatory sandbox—launching Utah's model for regulatory experimentation.

2021



**Industry-Agnostic
Regulatory Sandbox**

FIRST IN NATION

First state to create an industry-agnostic regulatory sandbox—one framework for any industry.



**Standards-Based
Mobile Digital ID**

NATIONAL LEADER

Early leader in implementing the international mDL standard and mobile driver's license.

2022



**Utah Consumer
Privacy Act**

EARLY LEADER

(4TH STATE)

One of the earliest states to pass comprehensive consumer privacy legislation.



**Blockchain &
Digital Assets**

NATIONAL LEADER

- ✓ First distinct DAO legal entity
- ✓ Protected self-custody
- ✓ Protected staking
- ✓ Protected node operation
- ✓ Protected mining rights

Top 3 state nationally*
"Trailblazer" in 2025 national blockchain policy scorecard

2023



**First Distinct
DAO Legal Entity**

FIRST IN NATION

First state to create a limited liability decentralized autonomous organization (DAO) as a distinct legal entity separate from its members.



**First State Social
Media Framework
for Minors**

FIRST IN NATION

First state to enact broad laws governing minors' use of social media platforms.

Original framework subsequently revised and subject to litigation.

2024



**First Dedicated
Office of AI Policy**

FIRST IN NATION

First state to create a dedicated Office of AI Policy and AI learning laboratory.



**Comprehensive
Government
Data Privacy**

FIRST IN NATION

First state to pass comprehensive government data privacy legislation with an Office of Data Privacy and privacy rights for individuals.

2025



**App Store
Accountability Act**

FIRST IN NATION

First state law placing age-category verification and parental consent responsibilities on app stores.



**Large-Load Energy &
Ratepayer Protection**

NATIONAL LEADER

Early state framework to accommodate major new energy loads without shifting infrastructure costs to residential ratepayers.

2026

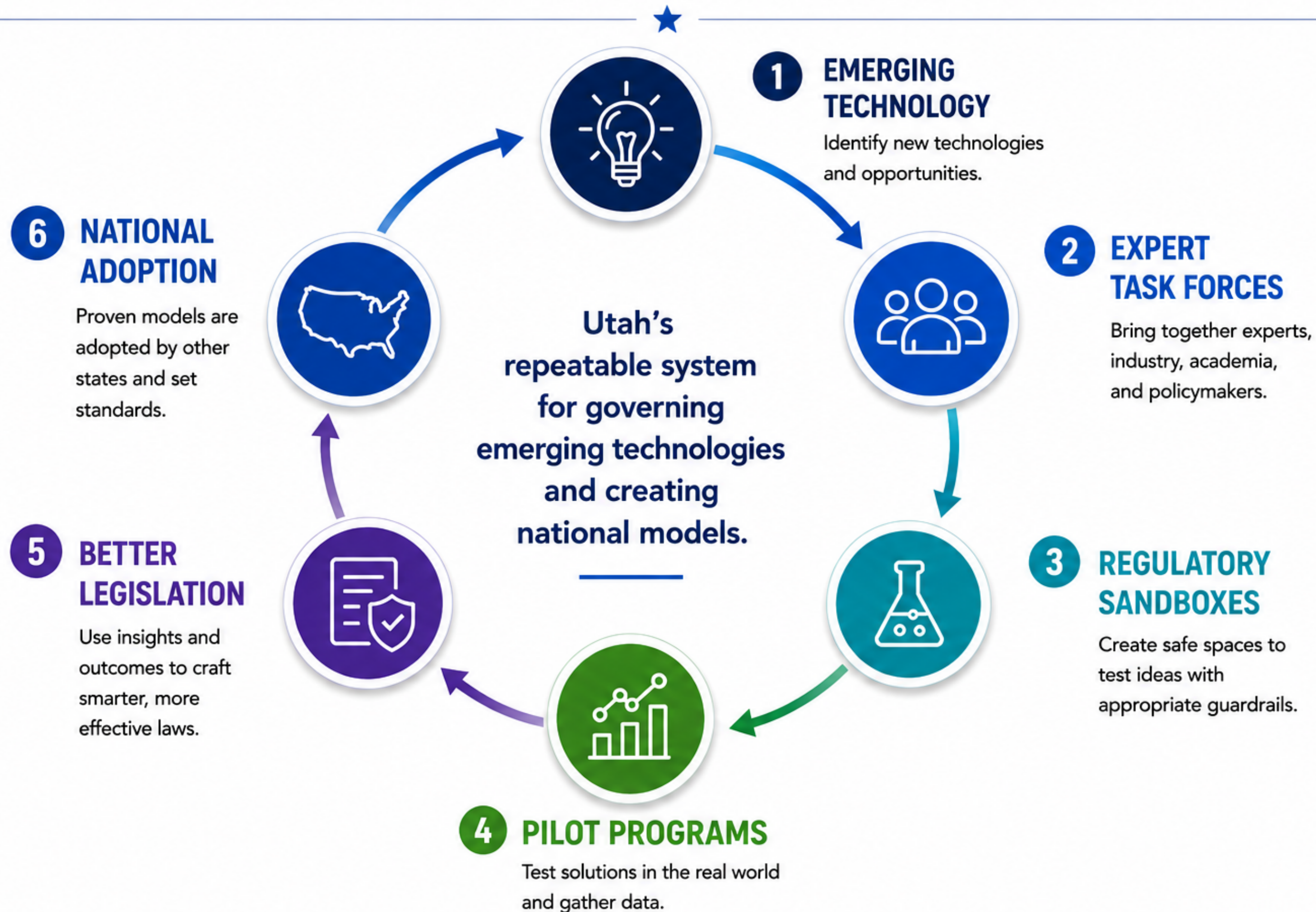


**State-Endorsed
Digital Identity**

FIRST IN NATION

First privacy-centered, state-endorsed digital identity framework with a Digital Identity Bill of Rights.

THE UTAH POLICY INNOVATION ENGINE



SIX PRINCIPLES BEHIND UTAH'S POLICY LEADERSHIP



1

SPECIALIZED EXPERTISE

Standing task forces and dedicated offices build deep knowledge and stay ahead of emerging trends.



2

FAST LEGISLATIVE ITERATION

Short feedback loops and annual refinement allow Utah to adapt quickly as technologies and risks evolve.



6

CONTINUOUS LEARNING

Measure outcomes, revise, and scale what works—turning experience into better policy.



3

REGULATORY EXPERIMENTATION

Sandboxes and pilot programs enable real-world testing before scaling statewide.



5

CITIZEN-FIRST DESIGN

Policies protect individual rights, consumer privacy, and ratepayers—always putting people first.



4

CROSS-SECTOR COLLABORATION

Government, industry, academia, and regulators work together to design smarter solutions.



THE UTAH MODEL

A REPEATABLE SYSTEM
FOR BETTER POLICY

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1. DATA GOVERNANCE

Establishes clear rules and balances rights of privacy and transparency, while also providing the guardrails for the proper use of data by governmental entities.



Define lawful purposes and limitations



Protect individual rights and freedoms



Ensure accountability and oversight



Balance public interest with privacy



Governance sets the foundation so data serves people.



2. VERIFIABILITY

Verifiable data, individuals, and transactions are essential to address AI-driven fraud, security threats, and misinformation.



Verifiable identities and credentials



Verifiable data and provenance



Detect fraud, duplication, and tampering



Build trust in people, data, and systems



Verifiability builds trust and security in an AI-enabled world.



3. AUTOMATION & EFFICIENCY

When done right, AI and automation free up resources and solve routine problems so people and public funds focus on what technology cannot.



Automate routine and repetitive tasks



Increase efficiency and reduce costs



Empower public servants and communities



Focus resources on complex challenges



Efficiency multiplies impact and frees people to solve what matters most.

STRATEGIES THAT ENABLE THE THREE PILLARS



GOVERNMENT DATA PRIVACY ACT

Establishes legal duties and protections for governmental entities in the collection, use, sharing, and retention of data.



SEDI (State-Endorsed Digital Identity)

Provides individuals with secure, privacy-protective digital identity that is state-endorsed and individual-controlled.



VERIFIABLE RECORDS

Ensures the authenticity, integrity, and permanence of records across their entire lifecycle.



AUTOMATED DECISION MAKING

Uses AI and automation responsibly, transparently, and accountably to improve decisions and outcomes.



DATA GOVERNANCE MODELS

Common frameworks, standards, and practices that support all three pillars.

UTAH GOVERNMENT DATA PRIVACY ACT FRAMEWORK



1

PRIVACY GOVERNING BOARD

Sets statewide policy direction, establishes priorities, addresses systemic issues, and recommends resources and statutory changes.



2

UTAH PRIVACY COMMISSION

Provides expert review, research, and recommendations on governmental privacy issues.



3

OFFICE OF DATA PRIVACY

Leads statewide implementation, develops the strategic privacy plan, provides guidance and tools, identifies gaps, and coordinates privacy practices.



4

GOVERNMENTAL ENTITY DUTIES

Operational requirements governing collection, notice, use, sharing, security, access/correction, breaches, contracts, training, and other processing obligations. Collection limited to the minimum personal data reasonably necessary for the specified purpose.



5

FORWARD-LOOK STRATEGY

New processing must comply with privacy requirements.

Existing noncompliant processing must be identified, documented, and brought into compliance through a defined strategy.



6

TRANSPARENCY & REPORTING

Reporting requirements create visibility into governmental processing and support statewide oversight and continuous improvement.



7

COMPLAINTS & ENFORCEMENT

Individuals have a resource for privacy complaints and disputes, with escalation and enforcement mechanisms for violations.



GOVERNANCE & SUPPORT

Provides oversight, leadership, and expert guidance.



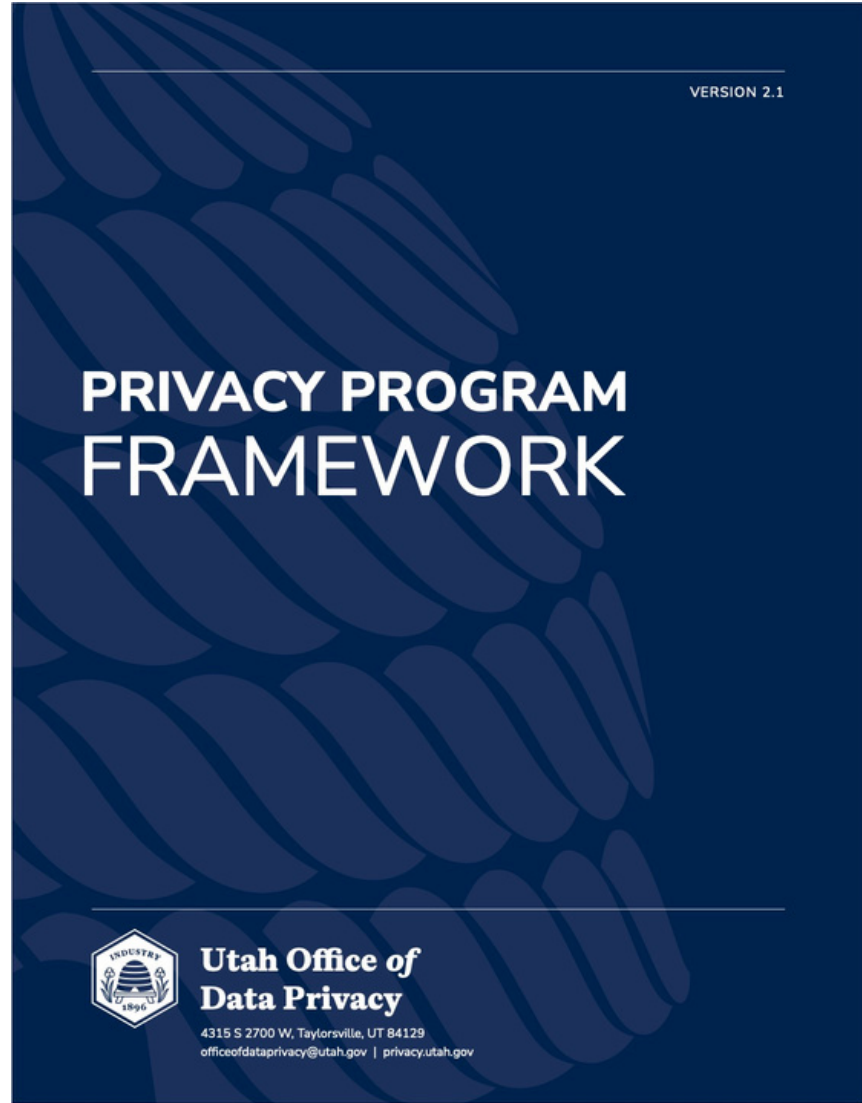
GOVERNMENT COMPLIANCE

Ensures agencies follow the law and meet privacy obligations.



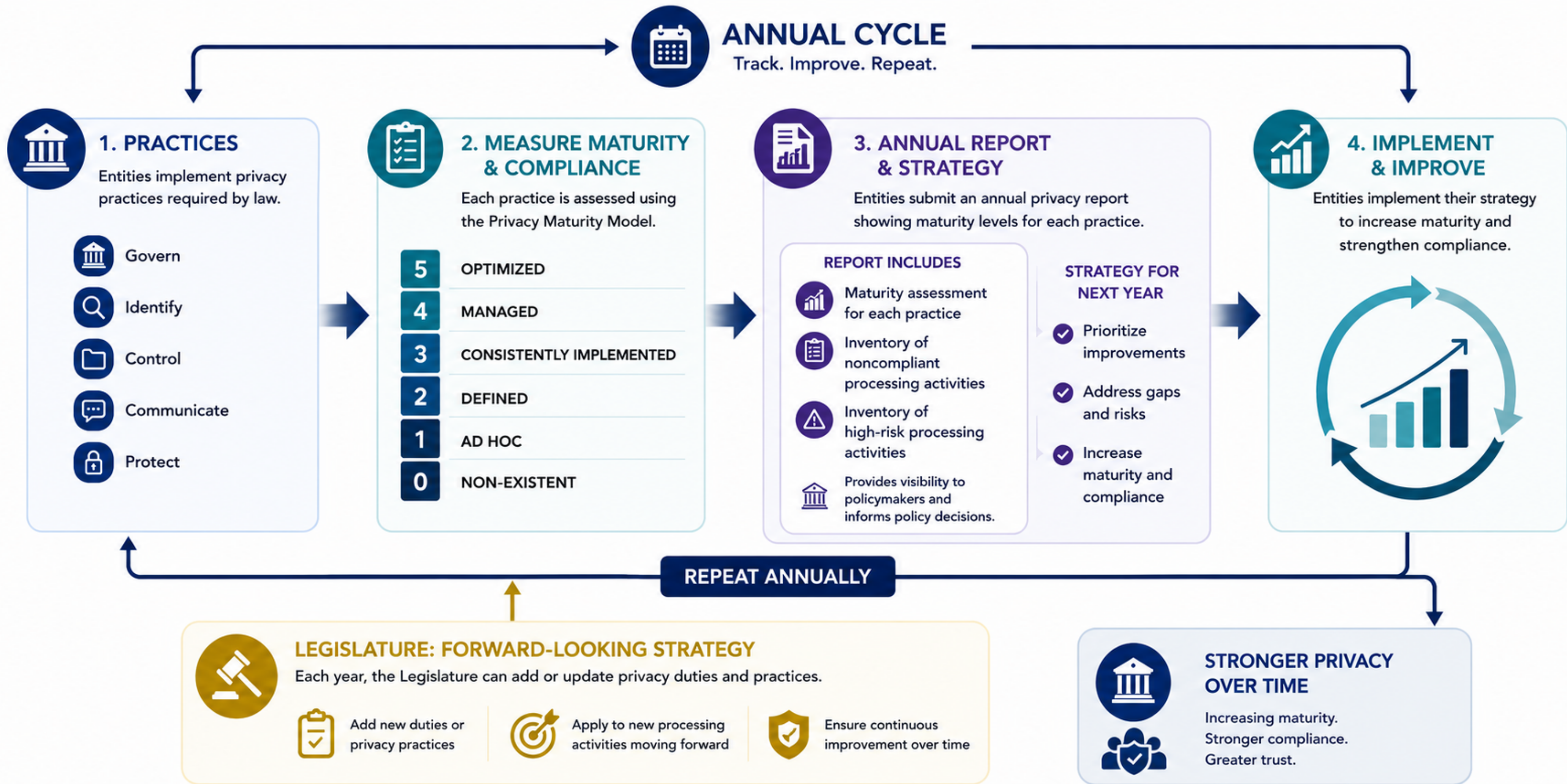
ACCOUNTABILITY

Ensures transparency, responsiveness, and enforcement.



PRIVACY PRACTICES

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



STATE-ENDORSED DIGITAL IDENTITY (SEDI)



**Individually
Controlled**



**State-Endorsed
and Protected**



**No Tracking and
No Surveillance**



**Built for Secure,
Private, and Efficient
Interactions**

A COMPREHENSIVE POLICY APPROACH



INDIVIDUAL CONTROL & PRIVACY

Individuals own their identity and choose what to share, with whom, and for how long.



SECURITY & TRUST

Strong identity proofing, continuous assurance, and protection against fraud, duplication, and misuse.



LEGAL PROTECTIONS & RIGHTS

Backed by state law that enshrines rights, sets duties of loyalty, and ensures accountability.



GOVERNANCE & OVERSIGHT

Transparent governance, independent audits, and meaningful recourse for individuals.



INCLUSIVE & UNIVERSAL ACCESS

Accessible to all residents, with the right to paper and non-digital alternatives preserved.



Result: A policy foundation that earns trust, protects freedom, and enables innovation.

A GOLDEN REFERENCE TECHNICAL IMPLEMENTATION



STATE-ENDORSED

Issued and governed by the state to provide assurance and trust.



PRIVACY BY DESIGN

No tracking, no profiling, no surveillance. Unlinkable across transactions.



INDIVIDUAL-CONTROLLED

Stored in a digital wallet. Individuals control their credentials and data.



STRONG ASSURANCE

Built to NIST 800-63 IAL3 and NIST 800-53 High. Resistant to modern and future threats.



SELECTIVE DISCLOSURE

Share only the data needed for a specific purpose—nothing more.



INTEROPERABLE & STANDARDS-BASED

Uses open standards so it works across states, sectors, and borders.



TECHNICAL FOUNDATION

Built on proven open standards (KERI/ACDC) with support for mdoc, W3C Verifiable Credentials, and SD-JWT. Provides verifiable identities, credentials, and transactions with cryptographic proofs, tamper detection, and auditability.

WHY SEDI MATTERS



PROTECTS FREEDOMS

Preserves privacy and civil liberties in a digital world.



REDUCES FRAUD

Stronger identity assurance stops fraud, waste, and abuse.



DRIVES EFFICIENCY

Simplifies interactions and lowers costs for government and individuals.



ENABLES INNOVATION

Provides a trusted foundation for new services and economic growth.



ELIMINATES INTERMEDIATION OF IDENTITY

Removes the need to go through third parties to verify or track identity.

DIGITAL IDENTITY BILL OF RIGHTS

1

An individual possesses an individual identity innate to the individual's existence and independent of the state, which identity is fundamental and inalienable.

2

An individual has a right to the management and control of the individual's digital identity to protect individual privacy.

3

An individual has a right to choose, receive, and use a physical form of identity assertion that is endorsed by the state.

4

An individual has a right to not be compelled by the state to possess, use, or rely upon a digital form of identity assertion in place of a physical form of identity assertion that is endorsed by the state.

5

An individual has a right to state endorsement of the individual's digital identity upon meeting objective, uniform standards for eligibility and verification established by law, and a right to not have such endorsement arbitrarily or discriminatorily withheld or revoked.

6

An individual has a right to have the state's operation of digital identity systems governed by clear standards established by the Legislature, including for eligibility, issuance, endorsement, acceptance, revocation, or interoperability of digital identity assertions.

7

An individual has a right to transparency in the design and operation of a state digital identity, including the right to access, read, and review the standards and technical specifications upon which the state digital identity is built and operates.

8

An individual has the right to choose what identity attributes are disclosed by the individual's state digital identity in accordance with standards established by the Legislature.

9

An individual has the right to any service or benefit to which the individual is otherwise lawfully entitled based on the individual's choice of a lawful format or means of identity assertion without denial, diminishment, or condition.

10

An individual has a right to be free from surveillance, profiling, tracking, or persistent monitoring of the individual's assertions of digital identity by the state, except as authorized by law.

11

An individual has a right to not be required by the state to surrender the individual's device in order to present the individual's digital identity.

STATE-ENDORSED DIGITAL IDENTITY MULTI-STATE CONSORTIUM



ALL STATES ARE INVITED TO PARTICIPATE IN THE SEDI CONSORTIUM.

Together, we are building a privacy-respecting, secure, and interoperable digital identity framework that puts individuals first while enabling trust, innovation, and efficiency across borders.



**ATTENTION STATE LEGISLATORS
WHO SPONSOR SEDI LEGISLATION:**



**YOU ARE INVITED TO THE
SEDI SUMMIT**
NOVEMBER 17-19, 2026
PARK CITY, UTAH

Join your fellow legislative leaders in Park City, Utah, where the SEDI Consortium will hold its **first meeting**.



**STATE LEADERS
& POLICYMAKERS**



**FEDERAL AGENCIES
& PARTNERS**



**INDUSTRY
& INNOVATORS**



**CIVIL LIBERTIES
& PRIVACY ADVOCATES**



**ACADEMIA
& EXPERTS**

SEDIs Summit.com



Utah Office of Data Privacy

Visit us at

privacy.utah.gov

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officeofdataprivacy@utah.gov

christopherbramwell@utah.gov