



**Division of
Technology Services**

**State of Utah
Division of Technology Services**

State CIO Office Special Recognition

***Utah's State-Endorsed Digital Identity: Preserving
rights in a digital age***

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EXECUTIVE SUMMARY

State of Utah CIO Alan Fuller has been instrumental in the creation of Utah's state-endorsed digital identity (SEDI) program, representing a pioneering shift in the national dialogue regarding digital rights and civil liberties. SB260 passed in the 2025 legislative session with clear guardrails for a digital identity system and instructions to research and return with recommendations. SB275 passed in Utah's 2026 legislative session, accepting the recommendations and authorizing the implementation of the state-endorsed digital identity program.

By adopting a policy-first methodology, the state engaged in extensive consultations with local, national, and international stakeholders, supplemented by direct community feedback from town halls and association meetings. This collaborative effort culminated in the implementation of the nation's first digital identity bill of rights. While additional work remains, this framework ensures that as Utah rolls out its digital identity program, the protection of residents' rights remains the central priority.

IDEA

Problem or opportunity addressed

After years of researching verifiable digital credentials and digital identity, Alan Fuller and team identified a critical lack of public policy and foundational principles guiding technology implementations. Digital identity systems are being adopted in the United States and internationally without the necessary level of public discussion and legislative guidance. Our work identified a need to prioritize protecting individual rights and privacy, safeguarding children and the vulnerable, strengthening families and communities, and reducing fraud.

We have identified several major trends that support the need for a strong digital identity. They all generally stem from the fact that the internet is missing an identity layer for people. Addressing that issue with a state endorsed digital identity is anticipated to have great benefits. Among the benefits are better protection against cybercrime, identity fraud, and the rise of Generative AI deepfake fraud. The digital delivery of government services relies on solid online identification of individuals, and there is a need for online identity verification for commercial interests. The most prevalent method of authentication relies on shared secrets, (e.g. username and passwords). Attempts to strengthen the inherent vulnerability of shared secrets such as multi-factor authentication have helped but cannot fully resolve the problem. A simple search of the internet will reveal a multitude of examples of credentials being used to compromise computer systems around the globe. A recent [report from Flashpoint](#), a cyber threat intelligence firm, shows that over 3.2 billion credentials were compromised in 2024, an increase of 33% over 2023. The U.S. Government Accountability Office [released a report](#) in 2024 estimating that the federal government loses \$233 billion to \$521 billion annually to fraud. Among the risk factors identified in the report are: payment or eligibility decisions made outside of the federal agency,



such as those by state governments and challenges related to eligibility and identity, such as lack of information or data systems to confirm eligibility. The Federal Trade Commission [reported billions in consumer identity-related fraud in 2024](#). The U.S. Department of Homeland Security [released a report](#) detailing the threat of photo-realistic AI deepfakes to exacerbate identity-related fraud. Many online age verification laws have been passed over the last few years that will need a privacy-preserving digital identity. This is pushing identity verification into age groups that have not previously needed reliable identity credentials online and highlights the need to handle the full lifecycle of an individual's identity. Commercial reliance on secure digital identities is expected in finance, healthcare, supply chain management, education, professional licensure, human resources, loyalty programs, and verifying service companies' representatives. States need reliable online identity to administer both their own programs and those of the federal government. Because of the level of fraud also occurring in the private sector, Utah expects that a digital identity with government backing will be extensively used there as well.

Alan and the Division of Technology Services (DTS) have been instrumental in the legislative creation of Utah's SEDI program, representing a pioneering shift in the national dialogue regarding digital rights and civil liberties. The purpose of SEDI is to create a trusted online relationship. We are adding state endorsement to that relationship where it hasn't existed before.

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Why it matters

The digital identity space critically lacks public policy and foundational principles, leading to systems being adopted without sufficient legislative guidance or public discussion. Failure to act risks individual rights, privacy, children's safety, family cohesion, and increased fraud. The SEDI program addresses this by creating a trusted online relationship with state endorsement, prioritizing rights protection for over 3.5 million people.

There are several motivating factors for SEDI, including to:

- **Mitigate cybercrime:** moves from what you know (username and password) to what you can prove
- **Combat the looming identity crisis:** current identity verification methods will not withstand attacks from AI
- **Privacy preserving online age verification:** digital IDs will allow online age verification and guardian permission in a privacy preserving manner
- **Enhance digital delivery of government services:** digital ID will reduce the burden of identity verification for citizens and government



- **Assist commercial interests:** digital ID will help with commercial interactions, not just government interactions.

What makes it different

By adopting a policy-first methodology, the state engaged in extensive consultations with local, national, and international stakeholders, supplemented by direct community feedback from town hall and association meetings. This collaborative effort culminated in the implementation of the nation's first digital identity bill of rights. While additional work remains, this framework ensures that as Utah rolls out its digital identity program, the protection of residents' rights remains the central priority.

What makes it universal

This project offers a pioneering framework applicable to other states by addressing the national and international need for legislative guidance in digital identity systems. Key principles—including Privacy by Design, Anti-Surveillance, and Duty of Loyalty—establish broadly applicable mandates for protecting individual rights in a digital age.

IMPLEMENTATION

Roadmap

The project adopted a policy-first methodology built on an intensive, multi-year stakeholder engagement strategy. **Key milestones include:**

- Passing 2 laws (SB260 in 2025 and SB275 in 2026).
- Establishing a State Privacy Commission on principles.
- Holding numerous consultations, Town Halls, and 2 SEDI summits.
- Sought feedback from local, state, federal, and international stakeholders.
- Analyzing an RFI with 1700 pages of responses.

Success is assessed by the implementation of the Digital Identity Bill of Rights, which mandates key outcomes such as Inherent Identity, Privacy by Design, and Freedom of Choice.

Who was involved

Alan Fuller and key groups included the Division of Technology Services, legislators, and advocacy groups such as the ACLU and Libertas. Approval and awareness were secured through an intensive, multi-year engagement strategy:

- **Consultation:** 12 industry forums and analysis of 25 RFI responses.
- **Public Outreach:** 4 regional town halls and 2 multi-state summits involving over 10 states.
- **Strategic Meetings:** 24 high-level meetings with legislators and advocacy groups.



How we did it

- **Resources (Time & Human):** A concurrent, multi-year initiative spanning two years, involving leadership, the Division of Technology Services, and extensive consultation with stakeholders.
- **Technical Rationale:** The architecture is governed by the Digital Identity Bill of Rights to enforce individual sovereignty. This mandates selective disclosure (Privacy by Design), prohibits tracking via 'phone-home' architectures (Anti-Surveillance), and requires a 'Duty of Loyalty' from providers, forbidding data mining or profiling.

IMPACT

What the project made better

Before: The environment was marked by a critical absence of policy and legislative guidance for digital identity.

After: The project successfully shifted digital identity from state-controlled to individual sovereignty by implementing the nation's first Digital Identity Bill of Rights and a legal 'Duty of Loyalty'. This ensures rights protection for 3.5 million residents. Mandated outcomes include Inherent Identity, Anti-Surveillance, and Freedom of Choice.

How we know

Utah's SB 275 (SEDI) shifts digital identity from state-controlled to individual sovereignty. Key outcomes include:

1. **Inherent Identity:** Recognizes identity as innate to the person, not a gift from the state.
2. **Privacy by Design:** Mandates selective disclosure, allowing users to verify facts (like age) without sharing raw data.
3. **Anti-Surveillance:** Prohibits tracking where IDs are used, banning "phone-home" architectures.
4. **Duty of Loyalty:** Requires providers to act in the user's best interest, prohibiting data mining or profiling.
5. **Freedom of Choice:** Users choose their own digital wallet. It also prevents mandatory adoption, preserving the right to use physical documents.

The SEDI program was built on an intensive, multi-year stakeholder engagement strategy:

- **Expert Consultation:** Participated in **12 industry forums** and analyzed an RFI with **25 responses** totaling **1,177 pages** of technical data.
- **Public Outreach:** Conducted **4 regional town halls** and **2 multi-state summits** involving over **10 states**.
- **Strategic Collaboration:** Held **24 high-level meetings** with legislators and **advocacy groups**, including the ACLU and Libertas.
- **Research:** Produced **4 strategic publications** and multiple media features.



Impact: This work established a **Digital Identity Bill of Rights** and a legal **"Duty of Loyalty"** protecting the privacy and sovereignty of over **3.5 million people**.

What now

Alan Fuller is a visionary leader for the future of digital identity not only in Utah, but across the nation.

- **Long-Term Plan:** The focus is on the ongoing rollout of the digital identity program while strictly maintaining the protection of residents' rights as the central priority.
- **Worthy Investment:** The project established a pioneering, foundational legal framework (Digital Identity Bill of Rights and Duty of Loyalty) that protects the privacy and sovereignty of over 3.5 million people, addressing a critical national need.

Alan Fuller's leadership has established the State of Utah as a national trailblazer, fundamentally redefining the public policy landscape of digital identity. Recognizing the critical lack of foundational principles guiding technology adoption, his visionary, policy-first methodology culminated in the passage of two landmark laws. The crowning achievement of this work is the implementation of the nation's first Digital Identity Bill of Rights and a legal 'Duty of Loyalty'. This framework, which includes mandates like Privacy by Design, Anti-Surveillance, and Freedom of Choice, ensures that the state-endorsed digital identity program prioritizes individual privacy and the protection of rights for over 3.5 million residents. Alan Fuller is a visionary leader who is not only working to create a trusted online relationship for Utah but also a pioneering, foundational legal framework applicable to other states, addressing a critical national need and safeguarding the digital future.