WaTech
Washington Technology Solutions

Office of Privacy and Data Protection 2024 Service Action Plan Metric Report

July 9, 2025

Katy Ruckle, State Chief Privacy Officer

Service Action Plan Metric Report

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Executive Summary

This report presents details on key metrics that the Office of Privacy and Data Protection (OPDP) aimed to achieve in 2024. Specifically, it reflects OPDP's efforts to measure its responsibilities through the following services:

- o Annual privacy review of state agencies
- o Training for agencies and employees
- o Articulate privacy principles and best practices
- o Tracking and publishing Privacy Threshold Analyses (PTA) and Privacy Impact Assessment (PIA) data

We are pleased to report OPDP met nearly all of its performance metrics, as detailed in this report. One area of measurement that we missed and adjusted for in the 2025 Service Action Plan was in publishing the 2024 Privacy Assessment Survey report results by February 1st. This date has proved to be difficult to achieve due to competing priorities of Privacy Week at the end of January and the demands of the legislative session. In response, the 2025 Service Action Plan adjusts the publication date to March 1 to better reflect operational realities.

Overall, OPDP achieved its goals for 2024, and looks forward to building on that progress through expanded efforts outlined in the 2025 Service Action Plan.

Introduction

Several years ago, WaTech performed an in-depth review of our service catalog, and outlined the goals, plans and activities for each service over the next one to five years. Central to this effort was a shift in perspective – viewing this planning process through the eyes of our customers in terms of how these activities will add value and benefit to the organizations using our services.

The result of that effort is the collection of service action plans for more than 60 IT programs and services that WaTech manages to deliver critical services to agencies and the residents of Washington state every day. These action plans are designed to provide a high-level overview of our current offering of services to help WaTech customers understand each service more fully and make informed decisions about their organization's IT strategy.

This initiative continues our collective effort to address IT service gaps and improve service delivery. As an agency, we have established meaningful goals that will improve, expand, maintain or discontinue our services. The action plan contained in this report supports WaTech's strategic planning efforts, which are focused on aligning technology strategy with the governor's priorities, agency strategic plans, Washington Enterprise IT Strategic Plan, and WaTech's strategic goals and initiatives. The plans provide a roadmap for each program over the coming years, giving agencies the insights they need to advance their business goals and deliver effective services to the public.

Below is a summary and results report on the 2024 OPDP Service Action Plan based on the following key performance metrics:

- **Annual privacy review**:
  - o Design and publish an agency privacy assessment survey by Aug. 10 annually in conjunction with the state CIO annual certification memo.
  - o Publish a report on survey results by Feb. 1 annually.
  - o Increase agency privacy maturity by measuring:
    - Adoption of privacy policies.
    - Hiring of privacy professionals.
    - Mandating privacy training for employees.

- **Training for agencies and employees**:
  - o Conduct and publish at least six webinars per year on privacy topics.
  - o Conduct Privacy Forum four times per year.
  - o Conduct monthly Privacy Community of Practice meetings.
  - o Publish monthly OPDP newsletters to communicate training opportunities for agencies and employees.
  - o Perform at least four OPDP public speaking engagements per year.

- **Articulate privacy principles and best practices**:
  - o Published privacy framework, and model policies.
  - o Design and publish online training for privacy principles.

- **Track and publish Privacy Threshold Analyses (PTA) and Privacy Impact Assessment (PIA) data**
  - o Measure number of PTAs.
  - o Measure number of PIAs.

How to engage

To engage with OPDP services, agencies can reach out to us at privacy@watech.wa.gov. Webinars, quarterly meetings, and trainings are available to public entities.

Rate information

OPDP is fortunate to receive funding and support from the legislative and executive branches to provide services to public agencies free of charge. Starting in FY 2024, OPDP has dedicated revenue from the State Privacy Office Allocation.

OPDP Statutory Responsibilities

The Office of Privacy and Data Protection (OPDP) is designated by statute (RCW 43.105.369) to be a central point of contact for state agencies on policy matters involving privacy. As defined by the Legislature, core OPDP duties include:
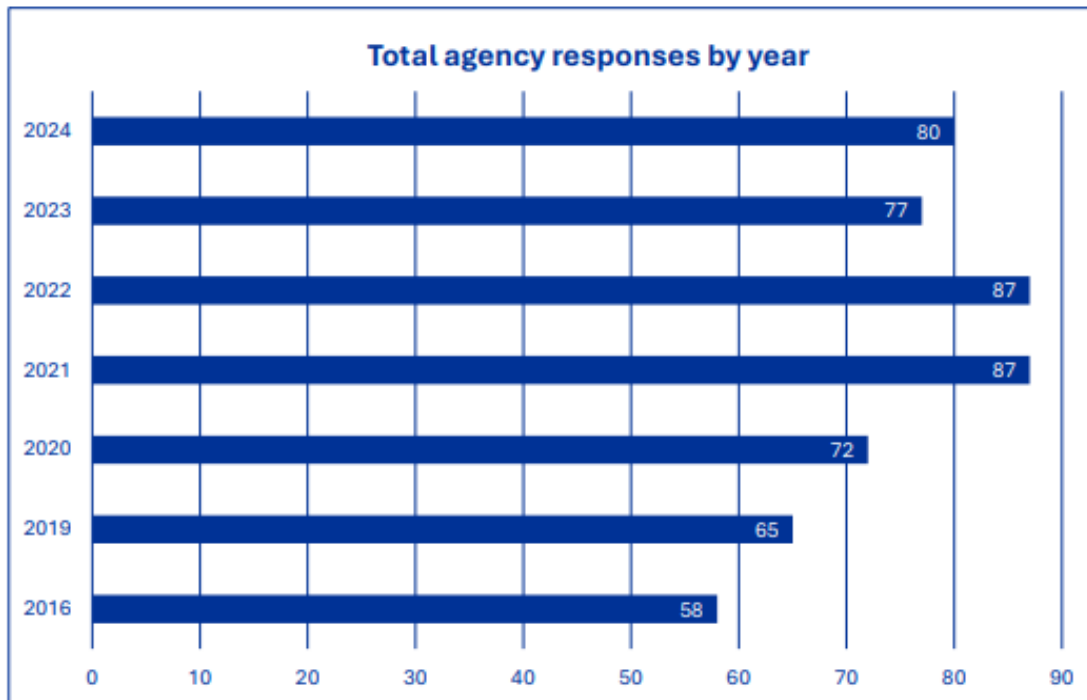
- Conducting an annual privacy review for all agencies and publishing an annual aggregated report.
- Conducting annual training for agencies and employees.
- Articulating privacy principles and best practices.
- Coordinating data protection in cooperation with WaTech.
- Participating in the review of major state agency projects involving personally identifiable information.
- Developing and promoting best practices, including training, and educating consumers about the use of personal information and measures to protect information.

2024 OPDP Service Action Plan Metrics

• Service: Annual privacy review

RCW 43.105.369 requires OPDP to conduct an annual privacy review of agency practices. The results help OPDP measure privacy maturity across state agencies and develop resources and trainings where they are most needed. The goal of the annual review is to establish an understanding of current practices. Agency functions and privacy requirements vary. What is a best practice for one agency may not apply to another. The annual privacy survey gives a high-level view of privacy practices across the state.

Since the first assessment in 2016, the number of executive branch agencies that respond to the privacy assessment survey has steadily grown. The State Chief Information Officer now sends the assessment to agencies as part of the annual technology certification process. Each year agency partners are required to provide information to track compliance with statewide technology policies.

Total agency responses by year

Year	Responses
2024	80
2023	77
2022	87
2021	87
2020	72
2019	65
2016	58

o **METRIC: Design and publish an agency privacy assessment survey by Aug. 10 annually in conjunction with the state CIO annual certification memo**.

Completed: July 1, 2024: 2024 Annual Technology Certification Requirements memo

Part 4 – Privacy Assessment Reporting Due by Sept. 30, 2024

The 2024 Annual Privacy Assessment is an online form. Each agency must provide a completed Privacy Assessment Survey by Sept. 30, 2024.

2024 Certification Timelines

2024 Annual Certification Schedule

	3rd Quarter 2024			4th Quarter 2024		
July	August	September	October	November	December
Application Inventory					
Infrastructure Inventory					
Annual Policy Certification					
Privacy Assessment					
			Annual IT Security Reporting		
Signed policy survey & attestation due 9/30/24 ◆					

JAY INSLEE
Governor

WILLIAM S. KEHOE
Director &
State Chief Information Officer

STATE OF WASHINGTON
WASHINGTON TECHNOLOGY SOLUTIONS
1500 Jefferson Street SE • Olympia, Washington 98504-1501

July 1, 2024

TO: Agency Directors
       Deputy Directors
       Chief Information Officers

FROM: William S. Kehoe, Director and State Chief Information Officer
       Washington Technology Solutions

SUBJECT: **2024 Annual Technology Certification Requirements**

Each year, agency partners must report on their technology portfolio and compliance with statewide technology policies. Agencies must attest to compliance each year based on policies approved by the Technology Services Board (TSB) by June of that year.

Completing WaTech's annual technology certification promptly is crucial for managing your agency's IT assets. Washington residents rely on us to keep their data safe, and technology supports nearly every state government function. As fiscal stewards, we ensure resources support agency priorities effectively.

The 2024 technology certification covers topics with significant business implications and risk indicators for your agency. It's an opportunity for agency business and IT leaders to engage in strategic conversations, such as legacy modernization and investment strategy. The information collected will help manage your IT assets and inform the state's strategic focus areas.

2024 Certification Requirements

The 2024 Annual Technology Certification process has five parts with due dates that fall between September and December 2024, as indicated below:

Part 1 – Application Inventory Due by Sept. 30, 2024

Each agency is responsible for updating their application inventory using the inventory template. This year there were a handful of modifications to the inventory template. Agency updates should include additions, changes and deletions from the data collected last year. Please review the application inventory template for instructions and definitions, and the guidelines document for information on how to complete this inventory. Submit the completed inventory to WaTech's annual certification mailbox.

Part 2 – Infrastructure Inventory Due by Sept. 30, 2024

Please review the infrastructure inventory template for instructions and guidance. There are no new questions in the inventory template. Agency updates to this year's inventory should include additions, changes and deletions from the data collected last year. Submit the completed inventory to WaTech's annual certification mailbox.

- o **METRIC: Publish a report on survey results by Feb. 1 annually.**
  - • **Completed:** Report was approved and published on April 1, 2024: [2024 State Agency Privacy Assessment](#)

RCW 43.105.369 requires the State Office of Privacy and Data Protection (OPDP) to conduct an annual privacy review of state agency privacy practices. The results help OPDP measure privacy maturity across agencies and develop resources and trainings where they are most needed. The goal is to establish an understanding of current practices, not to measure compliance with specific laws or standards. Agency roles and privacy requirements vary and best practices for one organization may not apply to another. This report is a general assessment of privacy implementation across the state enterprise, and not an audit of specific agencies. Results from the 2024 survey indicate agencies continue to improve in the implementation of privacy protections, awareness and maturity. OPDP believes this improvement is a result of agencies developing and maturing their privacy programs and increasing awareness, developing resources, cross-agency collaboration, and the combined support from both the Governor and Legislature. There has been consistent improvement over the past five years of the survey.

The 2024 assessment covers many basic components of a privacy program and aligns with the OPDP state [Privacy Framework](#) and the state [Agency Privacy Principles](#). Washington was one of the first states in the nation to develop state specific privacy principles, a privacy framework and training. With the adoption of the enterprise-wide [Privacy and Data Protection Policy](#), Washington state continues towards more standardization across agencies.
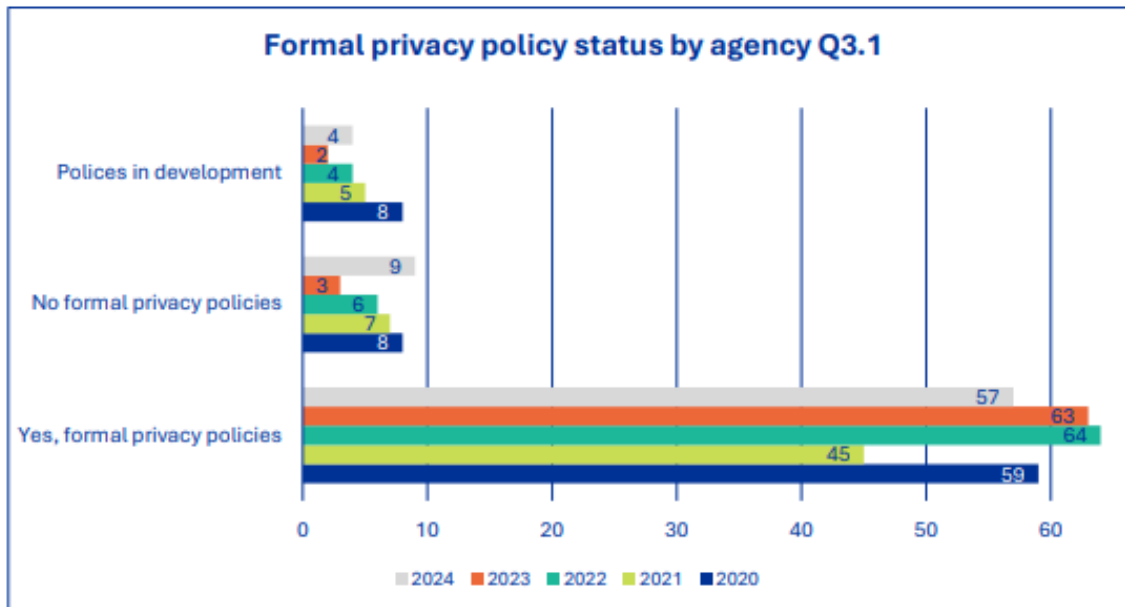
- o **METRIC: Increase agency privacy maturity by measuring adoption of privacy policies.**

Most state agencies that maintain personal data have started the process of implementing the concepts in the Washington State Privacy Principles and the Washington State Privacy Framework for agency data protection.

Internal agency privacy policies apply to how information is collected, used and shared. Policies demonstrate that an agency understands the protections that apply to its information and has implemented appropriate standards. Policies are also one way to document the agency's commitment to how it will handle personal information.

There appear to be two factors driving adoption and implementation of formal privacy policies:

1. The newly adopted enterprise privacy and data policy.

2. Greater awareness and importance of privacy. Both factors have resulted in more policy development. Support from legislative and executive branch leadership has also been crucial.

Formal privacy policy status by agency Q3.1

- o **METRIC: Increase agency privacy maturity by measuring hiring privacy professionals.**

Agencies cannot adequately protect personal information without appropriate resources. The level of resources needed varies depending on the size of an agency, the functions it performs and the types and amount of personal information it maintains. OPDP asked agencies to choose one of five potential staffing strategies that best described their current approach to privacy. The options ranged from having a designated person whose primary job is privacy, to contacting external resources such as the Office of the Attorney General on an ad hoc basis. In 2024, 37 (up from 31 agencies in 2023) said they have a specific person designated to handle privacy policy issues (either as a primary or secondary responsibility).

The number of agencies reporting no one tasked with privacy policy is a positive metric for the enterprise. OPDP feels this low number is due to better awareness of privacy issues, the newly adopted enterprise privacy policy, and the robust availability of privacy related training and resources. Regardless of whether an agency has a designated person responsible for privacy, a variety of other staff tend to support privacy functions including information security staff, information governance staff, risk managers and records officers. OPDP strives to support all of these individuals across state government. Having a designated person responsible for privacy is a significant step towards accountability. It is otherwise difficult for an agency to take on privacy initiatives and ensure privacy controls are being implemented across the agency. OPDP has developed and implemented training for state agencies that can be utilized by personnel in any discipline – so that privacy protections can be enhanced. Dedicated staffing within agencies allows the OPDP to better target assistance for customer agencies with privacy work, training, or program development.

An example of OPDP support for privacy development at agencies is the convening of the community of practice for privacy professionals at the state level. This group is modeled on other existing communities of practice drawn from across agencies and has developed into a resource for efficiently answering questions, attacking challenges, and offering insight into new initiatives. The group is made up of state agency professionals coming from privacy, public records, legal, and cybersecurity positions. OPDP has also pursued and received federal grant funding to increase the number of certified privacy professionals at the state and local level.

Privacy staffing in the agencies by year and number of agencies Q2.1
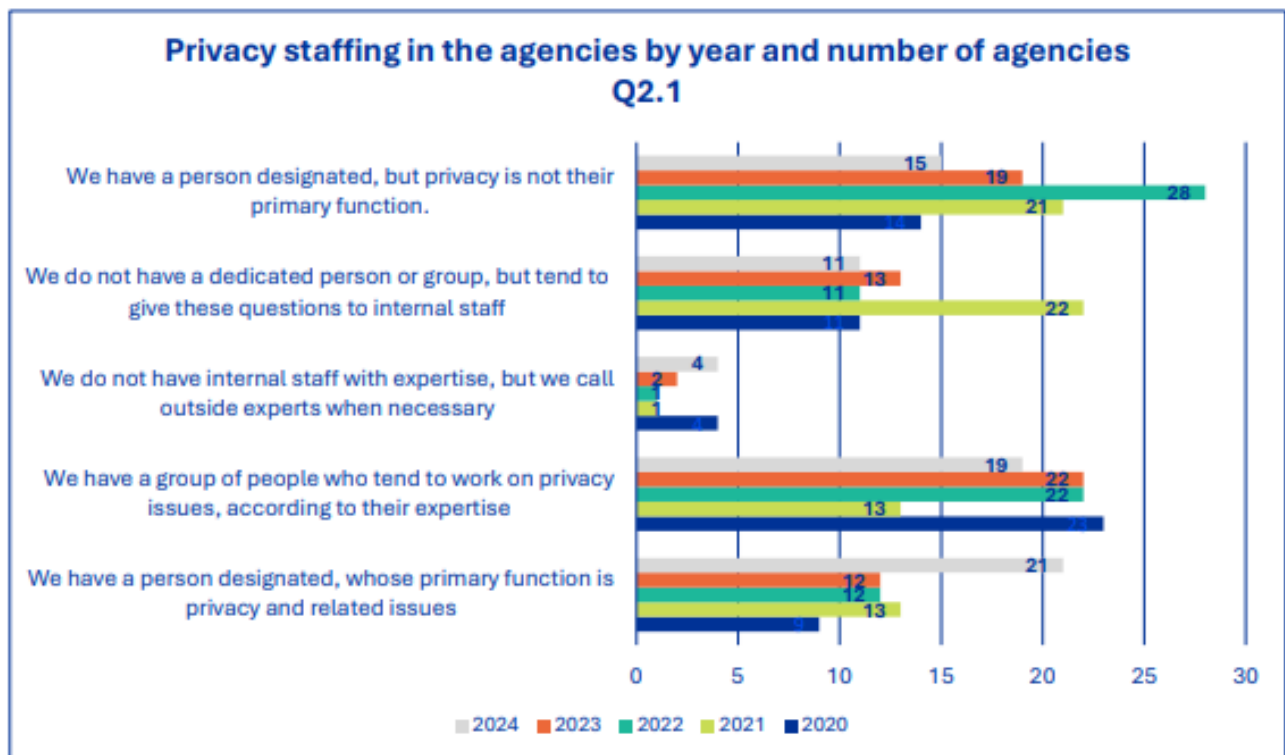
- o **METRIC: Increase agency privacy maturity by measuring mandated privacy training for employees.**

Staff training and privacy policies are both foundational controls that should be important pieces of any privacy program. As an organization that supports the whole enterprise of state government, OPDP strives to assist with both training efforts and model privacy policies.

Training helps to ensure staff understand the importance of protecting personal information and how to implement protections. Without training, staff may not understand the commitments the agency has made or the requirements the agency must follow for compliance. This is particularly important when dealing with privacy because many agency employees have access to personal information on a routine basis. Staff are the frontline

when it comes to data protection. Taken together, strong training and clear policies are important pieces of the transparency and accountability privacy principle.

OPDP developed statewide training to help agencies build awareness of the importance of privacy. This Privacy Basics training for Washington state employees is available to all state agencies through the enterprise learning center or via the OPDP website. The training is also being piloted to local governments that are interested in using it in whole or in part.

In addition to web-based training, OPDP created a formal two-day workshop to support agencies and individuals practicing and applying privacy principles. It is an excellent example of how OPDP as an enterprise-focused office can push out benefits and standards across dozens of state agencies in an efficient manner to support agency privacy professionals.

Privacy training status by agencies Q3.3
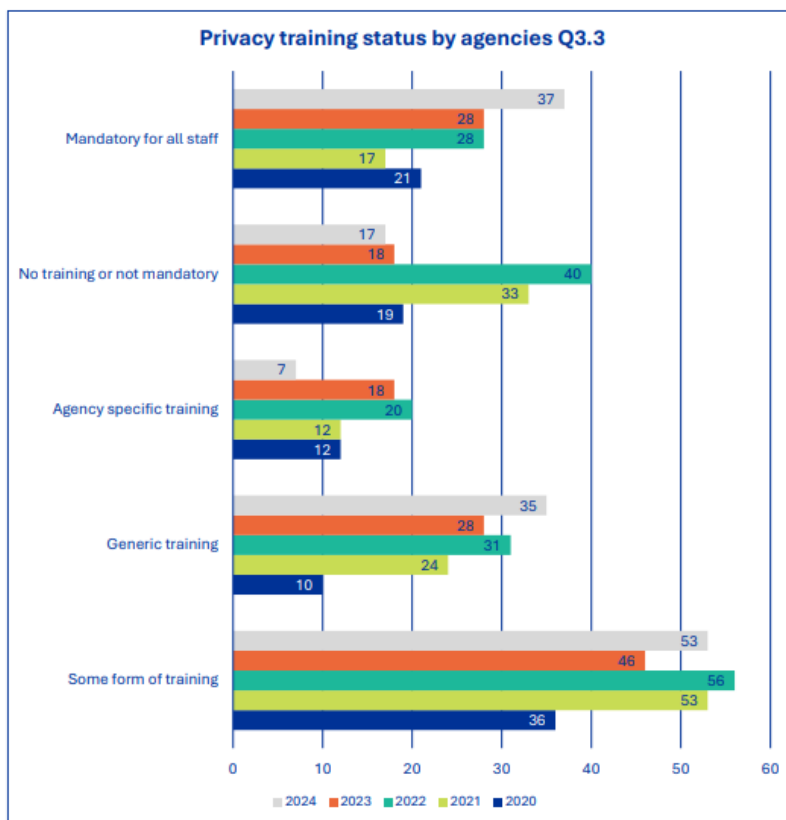
Agencies were asked the following questions about training in question 3.3 of the survey:

• Does your agency offer privacy training?

• Is the training mandatory? If so, is it mandatory for some or all staff?

• Is the training generic or specifically tailored to your agency?

The 2024 responses indicate a majority of agencies offer some form of training. This is consistent with past years data indicating more agencies offer privacy training each year. Often, privacy training is part of cybersecurity training. Standalone privacy training (either generic or specific) is beneficial for a better awareness and application of agency privacy policies.

Of the 53 agencies that offer training, 35 agencies reported generic privacy training, and seven reported agency-specific training. (Eleven agencies did not indicate if the training they

offer is generic or agency-specific). More agencies require privacy training now than in the past. More agencies are also making privacy training mandatory for employees.

OPDP reported last year that this was an area to watch as the state-specific OPDP developed privacy training was adopted across the enterprise. Expectations of more employees trained were met as agencies utilized the OPDP training. The OPDP prioritized creating a statewide privacy training program based on information from past surveys.

- ## Service: Training for agencies and employees

    - **METRIC: Conduct and publish at least six webinars per year on privacy topics.**

    OPDP 2024 Presentations

    In the 2024 privacy assessment survey, 49 agencies reported that they attended a webinar hosted or created by OPDP in the last year. These webinars are open to anyone in the state government who has an interest in the topics presented. The distribution list for these webinars is continuously growing with new people requesting to be added on a regular basis. Currently the invites go to over 400 individuals across the state enterprise. At the request of state workers who are unable to attend, OPDP also records and posts the webinars on our website along with the slide decks.

- **Kids Privacy and Data Protection (October 8, 2024)** Presentation from Katy Ruckle, the State's Chief Privacy Officer, on the current landscape of legislation to increase safety for kids online and other practical tips on children's data protection. This presentation will dive into the latest developments on the Kids Online Safety and Privacy Act (KOSPA) and some of the first amendment challenges regarding legislation on age-appropriate design code. **Slide Deck**

- **Privacy Policy Implementation Resources (August 29, 2024)** To support the implementation of Washington's first enterprise Privacy and Data Protection policy, the OPDP recently released Privacy Notice Implementation Guidance; a sample privacy policy; and a crosswalk. This webinar focuses on these resources, with a particular focus on considerations for successful implementation of agency privacy notices. **Slide Deck**

- **Ethical Considerations in the use of Artificial Intelligence in Healthcare, and Washington's approach to Generative AI (July 23, 2024)** This webinar provides an overview of the ethical issues that are arising with the prolific use and integration of AI in our lives, the 'black box' problem of identifying how AI systems make decisions, and use of AI in healthcare. What are the future legal and legislative implications around

the use of AI? And what is the state's approach to integrating AI to transform state services, while also recognizing and addressing potential risks posed by its use. **Slide Deck**

- **Digital Equity and Privacy** **(May, 24, 2024)** This webinar provides an overview of Washington State's efforts concerning digital equity and privacy. Slide Deck

- **Sometimes Asked Questions** **(April 25,2024)** This webinar shares insight into questions that the Office of Privacy and Data Protection received about privacy issues. Some of the topics include data share agreements, website tracking pixels, facial recognition, offshore data storage and more. **Slide Deck**

- **Privacy and Data Protection Policy Webinar** **(February 29, 2024)** This webinar provides an overview of the Washington State Privacy and Data Protection policy. **Slide Deck**

- **January 2024: Privacy Week Webinars:**
  - **Interview with Washington state lawmakers** Sen. Ann Rivers and Rep. Mari Leavitt
  - **Discussion** with recognized experts on children's online privacy Chuck Cosson and Marsali Hancock
  - **Interview** with Assemblymember Buffy Wicks, the California lawmaker responsible for the Age-Appropriate Design Code Act

    o **METRIC: Conduct Privacy Forum four times per year.**

The State Agency Privacy Forum is held quarterly. This meeting is for public employees with an interest in privacy, or whose work involves privacy. Attendees often include agency privacy professionals, IT workforce and IT security professionals, as well as from areas such as: contracts, risk, legal, legislative, records, and public records professionals. This quarterly meeting is sent out to 132 individuals, with many attending regularly. The advent of remote meetings has increased participation of the state workforce.

In 2024 the Quarterly State Agency Privacy Forum meetings were held on:

- ✓ March 20, 2024
- ✓ June 27, 2024
- ✓ September 19, 2024
- ✓ December 12, 2024

o **METRIC: Conduct monthly Privacy Community of Practice meetings.**

Monthly meeting for the Washington State Privacy Community of Practice (Privacy CoP) to meet and provide an opportunity for privacy professionals within state government to:
- Exchange best practices and lessons learned;
- Share helpful resources, tools, and templates;
- Collaborate on initiatives that impact multiple agencies; and
- Establish a peer network of support to improve privacy practices.

In 2024 the Privacy Community of Practice meetings were held on the first Wednesday of the month.

o **METRIC: Publish monthly OPDP newsletters to communicate training opportunities for agencies and employees.**

Public education and awareness: We work collaboratively with government entities to promote public awareness of privacy rights and responsibilities. Through educational initiatives and outreach, we aim to enhance understanding of privacy issues. As the State's Chief Privacy Officer, Katy Ruckle writes and distributes the monthly newsletter Privacy Points.

Twelve issues of Privacy Points for 2024 are available on the OPDP website.

- December 2024 Privacy Points
- November 2024 Privacy Points
- October 2024 Privacy Points
- September 2024 Privacy Points
- August 2024 Privacy Points
- July 2024 Privacy Points
- June 2024 Privacy Points
- May 2024 Privacy Points
- April 2024 Privacy Points
- March 2024 Privacy Points
- February 2024 Privacy Points
- January 2024 Privacy Points

o **METRIC: Perform at least four OPDP public speaking engagements per year**

Katy Ruckle, State Chief Privacy Officer, and other members of the OPDP team presented at many more than four public speaking engagements this year, but some of the highlights include the following:

Speaking event: National Association of Chief Information Officers 2024 Annual Conference

- Date: October 1, 2024
- Topic: Gen AI Legal Issues at a Glance

Speaking event: Route Fifty Innovation Spotlight

- Date: June 20, 2024
- Topic: Importance of Balancing AI innovation with Effective Governance

Speaking event: Nonconformist Innovation Podcast

- Date: June 14, 2024
- Topic: Ethics, AI, and the Future of Identity Verification

Speaking event: Identity Theft Resource Center Identivation Conference

- Date: May 21, 2024
- Topic: Unlocking Secure & Seamless Service Delivery: Strategies for Digital Portals

Speaking event: IAPP Global Privacy Summit

- Date: April 2, 2024
- Topic: State Chief Privacy Officers Role in State Government

Speaking event: TVW Inside Olympia

- Date: February 22, 2024
- Topic: State of Washington Approach to Generative AI

- ## Service: Articulate privacy principles and best practices

  - ### METRIC: Published privacy framework, and model policies.

In February 2024, OPDP held a training to introduce the enterprise privacy policy to state agencies. In July 2024, OPDP released the [Privacy Notice Implementation Guide](#) and an example privacy policy. We also hosted a webinar in August 2024 to train agencies on the policy and best practices for creating a clear privacy notice to help agencies be transparent about how they are collecting and using Washington residents personal information. Another resource OPDP created was the crosswalk document to demonstrate how the enterprise privacy and data protection policy incorporates the Washington State Agency Privacy Principles and Privacy Framework.

Another resource OPDP created was the crosswalk document to demonstrate how the enterprise privacy and data protection policy incorporates the Washington State Agency Privacy Principles and [Washington Privacy Framework](#).

 o ### METRIC: Design and publish online training for privacy principles.

Privacy Basics for Washington State Employees – OPDP developed a web-based privacy training that is available to all state agencies through the Department of Enterprise Services (DES) Learning Center.

The training is intended to be a privacy primer for all employees to understand what privacy is, why it's important and how it is distinct from cybersecurity. The course has three parts:

• Intro to Privacy: An overview on personal information, data categorization, and privacy harms and violations.

• Privacy in the State of Washington: This covers laws and policies, and state agency Privacy Principles.

• Privacy in Practice: A deeper dive into agency and employee responsibilities, and privacy best practices.

- **Service: Track and publish Privacy Threshold Analyses (PTA) and Privacy Impact Assessment (PIA) data**

  o **METRIC: Measure number of PTAs:** 132 PTAs were reviewed by OPDP in 2024.
  o **METRIC: Measure number of PIAs.** 17 of the PTAs review required PIAs.

Count of PIA Determination
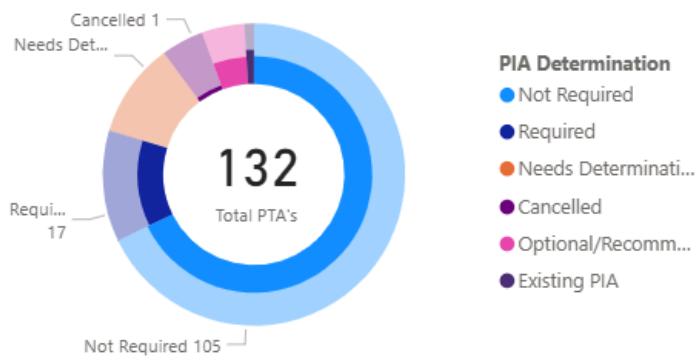
PTA = Privacy Threshold Analysis

PIA = Privacy Impact Assessment

Although PIAs are only required for a small fraction of all projects, there are benefits anytime an agency completes a PTA. It provides an opportunity for initial privacy review and often helps identify privacy risks even when those risks don't justify the more comprehensive privacy impact assessment.

Conclusion

The 2024 Office of Privacy and Data Protection (OPDP) Service Action Plan reflects our continued commitment to delivering high-quality privacy services in alignment with statutory responsibilities and the broader goals of WaTech and the State of Washington.

Throughout 2024, OPDP successfully met nearly all its key performance metrics, including conducting the annual privacy review of state agencies, delivering privacy training, promoting privacy principles and best practices, and tracking and publishing Privacy Threshold Analyses (PTAs) and Privacy Impact Assessments (PIAs). These accomplishments underscore our dedication to strengthening privacy maturity across state agencies and fostering a culture of data protection.

While we achieved most of our goals, we recognize the importance of continuous improvement. One area where we fell short was the timely publication of the 2024 Privacy Assessment Survey results by February 1, 2025, due to overlapping priorities, including Privacy Week activities and the demands of the legislative session. In response, we have revised the publication date for the 2025 report to March 1 to allow for more realistic scheduling and delivery.

Overall, the progress made in 2024 positions OPDP for continued success. We are confident that the adjustments incorporated into the 2025 Service Action Plan will allow us to build upon this year's achievements, address emerging challenges, and further enhance the value we provide to our agency partners and the public.

Appendices

For a comprehensive review of Office of Privacy and Data Protection work over the last four years, you can review our [performance report](#) published in 2024.

Contact

Questions regarding this paper can be directed to:

Katy Ruckle, JD, FIP, AIGP

State Chief Privacy Officer

privacy@watech.wa.gov