Process for <u>52.204-27 Prohibition on a ByteDance Covered Application.</u> Acquisition.GOV

Purpose: The term noted above prohibits use of TikTok or any successor applications on computers being used for work on a government funded research project (i.e., funded project). The term applies to any computing device that stores, transmits, or processes grantfunded research information for a funded project. When this term is incorporated into a sponsored research agreement, the university must comply. This term is most likely to be found in awards sponsored by the U.S. Department of Defense but could also be found in other federal awards.

How to Comply: All project personnel must use standard purchasing processes when acquiring technology devices that will be used for the funded project. Additionally, the technology must be imaged and built by Marquette's IT Services, which will allow the project to remain compliant with the terms and conditions of the award through the blocking of TikTok or any successor application.

The Office of Research and Sponsored Projects (ORSP) Grant Contracting team will flow down this term to any subawardees, as applicable.

When the Grant Contracting team identifies this clause in an agreement, they will send an email to the PI and cc the IT Compliance Manager and the Director of Information Security. **The e-mail will ask the PI to provide the following information:**

- A list of the laptops and desktops associated with the project, including existing researcher and lab devices as well as any devices that will be purchased with grant funds.
- A list of all of the personnel associated with the project. It is the PIs responsibility to notify Grant Contracting of any new devices or project personnel hired on the project throughout the life of the project.
- Certification that the PI and any other personnel working on the grant will not use non-Marquette devices to remotely access the data. This certification can be made by the PI via an e-mail to <u>grantcontracting@marquette.edu</u> and cc'ing the Executive Director of the ORSP.

When the PI responds, Grant Contracting personnel will upload a copy of the e-mail, indicating the devices, personnel and certification, as an attachment to the Award.

Engaging IT Services:

The Director of Information Security will forward the e-mail from the PI to the Application Specialist requesting the devices.

Utilizing the laptop and desktop names, the Enterprise Desktop Engineer will establish system blocking that will not allow for a user to access TikTok or any successor applications. The Director of Information Security will receive an email from the Enterprise Desktop Engineer indicating all blocking protocols have been established for the designated devices. IT security will do a high level review at time of implementation for the device ensuring all appropriate products have been blocked.

For devices that are not managed by IT Services, college/department-level technology support staff may need to assist with implementation of application and site restrictions.

The Director of Information Security will forward this e-mail to grantcontracting@marquette.edu and cc the Executive Director of the ORSP. The e-mail again will be uploaded in Kuali.

The current blocked applications consist of the following products from ByteDance:

- TikTok: Social media platform

CapCut: A video editorHypic: Photo editorUlike: Selfie application

- Lark: A digital collaboration suite

- BytePlus: Analytics tool