Mobile Application Review and Distribution Processes


Emory requires an internal review of all mobile applications developed at Emory prior to submission for distribution in public marketplaces, including but not limited to the Apple App Store and Google Play. This process is initiated by the Emory mobile application owner via ServiceNow request and facilitated by the mobile application review coordinator, in consultation with the Office of Technology Transfer, Legal Counsel, the Office of Compliance, Communications & Public Affairs, and Office of Information Technology Services (OIT). To begin the process, please visit [https://wiki.service.emory.edu/x/FqMIAw](https://wiki.service.emory.edu/x/FqMIAw). As part of the Apple and Google submission processes for public distribution of mobile applications, parties distributing mobile applications must affirm their ownership of the intellectual property and accept marketplace terms and conditions, which include assuming some liability and accepting business obligations. Although Apple spends considerable effort tracking the ever-changing tax landscape, it is possible that errors and miscalculations can happen. If there is an underpayment assessment, the funding for that liability is not covered from a central source of funds. It will be up to the department, unit, or school to fund that expense in the unlikely event it were to arise. For these reasons reviews of the intellectual property ownership status, marketability, and potential liability to Emory are essential. All mobile apps owned by Emory are to be distributed through official Emory channels (i.e., Emory marketplace accounts) unless special dispensation for another distribution method is obtained during the review process.

Emory must also determine if mobile applications collect, transmit, or store any sensitive data and, if so, ensure that Emory’s FERPA, HIPAA, PCI, or other appropriate compliance obligations are met. Distribution of mobile applications to any external (non-Emory affiliated) people without completing Emory’s mobile application review process is prohibited. Distributing mobile applications that one does not personally own may also be a violation of marketplace agreements.

Draft Policy for Use of Mobile Vended Apps at Emory for Purposes Subject to Policy Compliance (work in progress, not yet approved or adopted)

Emory requires a review of all mobile apps used for purposes subject to Emory policy and regulatory compliance. These purposes include the acquisition, storage, and transmission of data that is subject to Emory compliance policies such as student information, employee data, and protected health information. Mobile apps developed at Emory are already covered under internal and external distribution review policies. This process applies specifically to mobile apps available on public marketplaces like the Apple App Store, Google Play, and others as well as any mobile apps available through other distribution channels or individual developers, hereafter referred to as Vended Apps.

Emory requires that all Vended Apps that are intended to acquire, store, or transmit sensitive information be reviewed for suitability and compliance by the appropriate Compliance Officer and Information Security. Once approved, all Vended Apps will be listed in the Emory Mobile App Catalog along with a description of their approved use. To begin this process visit [https://wiki.service.emory.edu/x/suIGBQ](https://wiki.service.emory.edu/x/suIGBQ).

Processes

Here are the processes for mobile app review and distribution at Emory to address the requirements for internal and external distribution. Detailed descriptions of these processes are at:

- Emory Mobile App Review and Distribution Process
- Emory Mobile App Endorsement and Listing Process for Apps Available in Public Marketplaces (Endorsed or Vended) (under development)

These processes may be updated from time to time. For example, Emory is presently using an interim internal app distribution mechanism, which leaves much to be desired. Emory is currently evaluating enterprise app store products with the goal of finding a product to support an improved internal mobile app distribution process.