Emory Mobile App Review and Distribution Process for Public App Marketplaces

Status of this Document

This is the current description of the Emory Mobile Application Review Process for apps bound for general availability releases in public app marketplaces. This document describes the process in use and not an ideal process. Comments and suggestions are welcomed as comments on this page, or you may send feedback to Marc Nuar at <mnuar@emory.edu>.

Which Applications Should Use This Process

Applications that will bear Emory branding or contain Emory intellectual property must be reviewed by Emory’s Mobile Application Review & Distribution Team (MARDT) and distributed via Emory’s marketplace accounts in both the Apple App Store and in the Google Play store. Apps developed by Emory that will not contain Emory branding or IP are not required to be distributed by Emory. These apps may be distributed through Emory if desired, but if so they must complete the review process outlined here.

Step 1: Request Distribution of the Application

Mobile apps must first be distributed to the internal Emory reviewers. This makes use of Apple’s TestFlight or Google’s Play Console to distribute the completed app to the review group. App owners should complete the Mobile App Review & Deployment Request form to start this process. These requests are generally responded to within two or three days, where the MARDT group will set up the developer with access to upload (but not distribute) the app to Emory’s accounts. MARDT then oversees the distribution of the app to the selected internal group of reviewers. An application may not be released or distributed to the public before all reviewers have approved the application. This process typically takes 2-4 weeks if there are no complications, but could take longer if changes or remediation are required.

Once the ServiceNow request to start this process has been received, the mobile app review coordinator will reach out to you with more details regarding the review process.

Step 2: Office of Technology Transfer Intellectual Property Analysis

Emory units desiring to release mobile applications should contact the Emory Office of Technology Transfer (OTT) for a review of the intellectual property and commercial prospects of the application. This process includes completion of an an Intellectual Property Disclosure. In general, any application owned by Emory will be released under the Emory brand and through the Emory App Store or Marketplace accounts. There may be exceptions to this general rule in the case of collaborations between Emory and other partners or in a case where technology has been licensed to a third party.

Rajsekhar Guddneppanavar (rguddne@emory.edu) is the primary contact with OTT.

Step 3: Communications & Public Affairs Branding Review

Following the intellectual property analysis in Step 2, mobile applications that are to be released under the Emory brand undergo a branding review with Communications & Public Affairs. Communications & Public Affairs has prepared a set of written guidelines and resources for the proper branding of Emory mobile applications. Unless a compelling business reason be can provided as to why a public mobile application should not carry Emory visual identity, branding guidelines should be followed. Stanis Kodman (stanis.kodman@emory.edu) is the point of contact with Communications & Public Affairs for Emory University. Mark Swilley (mark.swilley@emoryhealthcare.org) is the point of contact with Emory Healthcare Marketing.

Step 4: Legal Counsel Review

OTT will inform and consult with Emory Legal Counsel on the outcome of the IP review in step 2 and any specific plans for commercializing or charging for the mobile applications, its terms of use, etc.

Step 5: Compliance and Regulatory Review

Emory University and Emory Healthcare compliance officers review the mobile application to determine whether or not Emory’s HIPAA compliance or other appropriate compliance policies apply. Emory’s compliance officers provide the following general guidance in determining whether or not HIPAA applies to a mobile application:

1. If the mobile application collects, stores, or transmits personal health information for the personal use of the consumer and not for Emory people in their role as researcher, clinician, or support role, then HIPAA does not apply to the application.
2. Add item about FDA regulations and review [Kris West to suggest text].
3. If such an application provides Emory clinicians access to the personal health information for the purposes of billable patient care, then HIPAA does apply to the application.
4. If such an application provides researchers access to personal health information for the purposes of research or non-billable patient care, then HIPAA does not apply to the application, but Emory's security policies and practices for applications that handle personal health information still apply. See item #5.

5. All such applications that collect, store, or transmit personal health information must implement appropriate information security measures to protect personal health information, regardless of whether or not Emory's HIPAA compliance policies apply.

6. Emory Information Security has compiled a list of mobile app defaults and mobile app specific security review questions that must be considered when designing, developing, and distributing mobile apps.

Step 6: Technical & Information Security Reviews

Using the answers to the mobile app security questions, Emory Office of Information Technology (OIT) Security performs a high-level technical review of the application to determine if there is a need for any further detailed security and compliance reviews of the application. For example, if the application collects and stores ePHI, credit card information, or other compliance related data, Emory OIT will inform the owners of the application of the relevant policies and any practices required by those policies. Additional materials may be required, depending on the type of review specified. The organizer of the technical review team will contact application developers and help them prepare any additional materials.

If an in-depth security review is required, a meeting is scheduled with representatives of Emory Information Security to walk through a mobile app security checklist based on the security, compliance, and regulatory requirements that are relevant to the particular application.

Step 7: Office of Information Technology App Store Posting Review

Based on the outcome of the preceding reviews, remediations to the app may be requested by individual approving groups. Once all reviews have been completed and approvals gathered, Emory MARDT will notify the app owner that they may publish the app publicly. Timing on this does not need to be immediate and may be coordinated around announcements or related events.

Subsequent App Update Submissions

For subsequent application updates, application owners should update the technical review template and if there are substantial changes, request another review. For example, if the nature of the data being collected or stored by the application has changed and now ePHI is being collected when it was not before, then a new review should be scheduled. Application owners should also update the marketplace submission forms relevant to their applications for each subsequent submission. Changes that would not affect the answers to any of the review process forms or questions (such as minor content updates, UI tweaks, and bug fixes) do not require any re-review. If there is any question as to whether changes should be reviewed, please contact the app review coordinator listed above.

Public App Review and Distribution Process Flow

Please click on the image below to enlarge.