Prohibited Technologies

State of Texas Regulatory Update

TEXAS A&M UNIVERSITY
Technology Services

Background

7 Dec 2022	Governor issues order requiring all state agencies to ban TikTok from all state-owned devices and networks; directs TxDPS and TxDIR to develop plan providing state agencies guidance on managing personal devices they use to conduct state business.
6 Feb 2023	Governor announces statewide model security plan for state agencies to address vulnerabilities presented in the use of TikTok and other software on personal and state-issued devices.
14 June 2023	Texas Legislature passes SB 1893 88(R) amending Texas Government Code to add chapter 620: *"USE OF CERTAIN SOCIAL MEDIA APPLICATIONS AND SERVICES ON GOVERNMENTAL ENTITY DEVICES PROHIBITED"*
12 July 2023	Texas A&M University System issues systemwide security plan; directs members to implement "*administrative, operational or technical security controls*" as necessary to comply

Definitions

Prohibit

Means to disallow the action through **policy** (administrative control)

Prevent

Means to disallow the action by implementing **technical controls**

Model Security Plan

1

Prevent TikTok and prohibited tech on state devices

Includes all state-issued devices capable of internet connectivity

2

Prohibit state business on personal devices

Personal devices only allowed if managed by the agency

3

Identity sensitive locations

Includes elec. meeting rooms — personal devices NOT allowed in

4

Prevent prohibited tech on state networks

Includes firewall and VPN configurations — separate network possible

5

Coordinate with DIR

DIR hosts list of prohibited tech on website and sends notices upon update

Prohibited Software/Applications/Developers

- TikTok
- Kaspersky
- ByteDance Ltd.
- Tencent Holdings Ltd.
- Alipay
- CamScanner
- QQ Wallet
- SHAREit
- VMate
- WeChat
- WeChat Pay
- WPS Office
- Any subsidiary or affiliate of an entity listed above

Prohibited Hardware/Equipment/Manufacturers

- Huawei Technologies Company
- ZTE Corporation
- Hangzhou Hikvision Digital Technology Company
- Dahua Technology Company
- SZ DJI Technology Company
- Hytera Communications Corporation
- Any subsidiary or affiliate of an entity listed above

Texas A&M Process

Texas A&M — University-owned devices

- **Prevent** the use or download of any prohibited tech on all university-owned devices
  - Includes desktops, laptops, tablets, cell phones, other internet-capable devices
  - **Control** university-owned devices to monitor compliance; maintain ability to remotely wipe devices and uninstall prohibited software
- **Prevent** communication with prohibited applications on all university networks or devices
  - Control networks with firewall rules and VPN configurations
  - Control devices using endpoint management

Texas A&M — Personal devices

- **Prohibit** employees or contractors from using personal devices with prohibited tech to conduct university business
- **Prohibit** personal devices with prohibited hardware from connecting to technology infrastructure
  - Applies specifically to local networks
  - Connections to public-facing technology (such as a public website) are excluded

Texas A&M — Sensitive areas

- **Identify, catalog, and label** locations designated as *sensitive areas*
  - Sensitive locations are defined as any location, physical or logical (virtual meetings), that are used to discuss or create research product that is considered *Confidential* or higher
- **Identify and catalog** data that requires protection of sensitive areas
- **Prohibit** employees or contractors from bringing personal devices with prohibited tech into designated sensitive areas
  - Visitors are subject to this policy

Texas A&M — Procurement controls

- **Prevent** procurement of any hardware or software that meets the criteria published by DIR
- What is the operational definition of **subsidiary** or **affiliate** ?
  - DIR has not defined this
- **No positive responsibility** to search for corporate structure information
  - Once notified of a subsidiary or affiliate relationship, must act

Texas A&M — Exception process

- **Law enforcement** and public safety investigations
- Other **investigations and adjudications** required by law, regulation, or policy
- Enforcement of system-owned **intellectual property rights**
- **Research** in which a Prohibited Technology is critical to the project and an approved technology control plan is in place to protect campus research security, data and networks

State Bill 1893

- **More restrictive** — exceptions are allowed only for:
  - Providing law enforcement
  - Developing or implementing information security measures
- Risk mitigation measures are required for any exceptions
- SB 1893 only applies to software (no hardware)

Texas A&M — Exception process

- Exceptions may only be approved by the agency head (president)
  - This authority may not be delegated
  - Exceptions are only valid for one year and must be renewed
- All approved exceptions must be reported to DIR through the CISO
- Devices granted an exception should only be used for the specific use case and only on non-state or specifically designated separate networks
  - If possible, cameras and microphones should be disabled on those devices when not in active use for their intended purpose
- For personal devices used for state business, exceptions should be limited to extenuating circumstances and only granted for a pre-defined period of time

Texas A&M — Exception process

- Information about the research and exception:
  - Project description and whether research is funded or unfunded
  - Why is the use of this technology imperative to the research?
  - Why are other comparative technologies insufficient?
  - What other comparative technologies were reviewed?
- An approved technology and data management plan specifying:
  - The use of the technology as part of the overall project
  - The risk mitigation measures that will be in place
  - Plan must be approved by the Office of the Chief Information Security Officer
- Notifications to:
  - Your representative Dean, Department Head, or Vice President
  - Vice President for Research and Responsible Conduct in Research Office
- Ultimate approval must be granted by the university president (state rule)
- Texas DIR and DPS will be notified; exceptions are for 1 year

Questions?