



Information Technology Committee (ITC) Minutes

Meeting Date: April 23, 12-1 pm (regular meeting)

Circulated: 9/24/2025

Approved: 9/29/2025

Present: Quentin Stout (Chair), Mashon Allen (VP's Chief of Staff), Natasha Allen, Susan Borda, James Cranford, Sanjeev Kumar, Colleen McClorey (Associate General Counsel, OGC), Deirdre Spencer, Jeffrey Yackley

Absent: Yasser Aboelkassem, Michael Bohanon, Ivo Dinov, Amir Mortazawi, Ravi Pendse (VP for Information Technology and CIO)

1. The meeting was called to order and the minutes from the previous meeting were approved.

2. DOJ ruling on bulk sensitive data

- Guest Colleen McClorey provided an overview, also prepared by David Grimm, of a new federal regulation intended to protect access to [sensitive bulk data](#) (see [FAQ](#)) related to countries of concern. The regulation had bipartisan support, began under the first Trump administration, continued under Biden, and was recently finalized.
- Enforcement is by the DOJ, with both civil and criminal (up to 20 years) penalties, with the DOJ expanding interpretation of the International Emergency Economic Powers Act (IEEPA). The regulation is nuanced, complicated, and, at times, contradictory. OGC has consulted with 20+ U-M entities, such as Procurement, MM, OVPR, the Provost's Office, HR, among others.
- The law covers individuals located in the U.S. or U.S. citizens abroad. It is difficult for universities to make these determinations. Access restrictions apply to all non-U.S. citizens that are outside of the U.S. There are [six categories](#) of data protected, for example, human genomic datasets of more than 100 U.S. persons. Access is defined very broadly and without regard to security requirements. Any "country of concern" could be covered, e.g. China, Russia, Iran, North Korea, Venezuela, Cuba. The regulation went into effect on April 8, and there is a current pause on civil (not criminal) enforcement for entities making efforts towards compliance.
- OGC is available for support and expertise, and the U-M community is encouraged to contact bulkdataregulation@umich.edu with questions.

Discussion

- It was recommended that the U-M libraries might be consulted, e.g. Deep Blue Repository and Research Data Services. An implication is that some data sharing contracts will need to be revised. Loaner laptops may be needed for some U-M researchers traveling abroad. There are questions about how to handle students' hardware not issued by U-M. It may be possible to geo fence U-M machines, but much more challenging for student machines. There are ways the regulation does not contemplate the realities of data use.
- There was additional discussion later in the meeting, including whether an implication might be potential harm to scientific collaboration. In addition, ethically, faculty are to give all students an equal research opportunity, and the regulation seems to exert pressure to differentiate by country of origin. A question was raised about data donation, i.e. if individuals specifically donate their own data indicating that they want the data to be shared widely. The negative and deeply troubling impacts of the 2018 China Initiative were mentioned.

3. Final ITC Report



- ITC members brainstormed ideas for the final ITC report, including possible charge items for 2025-2026:
- Provide an update on summer developments, especially any IT-related federal policies
- Hold a joint meeting with the Research Advisory Committee (RAC) to discuss ways that IT might enhance support for U-M researchers.
- Brainstorm strategies to provide better support with students' hardware needs. A faculty member has experienced challenges with students whose laptops are not able to run the needed hardware and/or software for course assignments. This may be exacerbated by students taking classes outside of their major. For example, Ross offers Ross Anywhere, but non-Ross students may not have easy access to this. Some loaner laptops are available, but it seems there is a patchwork approach with every school doing something different.
- Consider opportunities for more comprehensive IT integration with U-M Flint and U-M Dearborn. It was noted that U-M Flint is working on having a new network, and also noted that duplication of IT services at U-M Flint and U-M Dearborn may not be ideal.
- A question raised about IT security, privacy, and data given current events and the detention and/or harassment of students and/or staff. Is it possible that some actors might use IT systems or data in nefarious ways, and are there steps that individuals and/or U-M IT can take to help protect against this?

4. Closing Remarks

- Appreciation was shared for the committee members' work over the past year and also for VP Pendse's engagement with ITC members and to talk about these important topics.

Meeting adjourned

Respectfully submitted,
Ann Marshall (FSO, Faculty Governance Coordinator)