



Policy on Cooperative Human Tissue Network (CHTN) compliance with [Executive Order 14117, February 28, 2024](#):

The Cooperative Human Tissue Network (CHTN), its member institutions/grantees (Duke University, The Ohio State University, University of Pennsylvania, University of Virginia, Vanderbilt University Medical Center and Nationwide Children’s Hospital), subsidiaries and affiliates represent and warrant that they are not a “covered person” as defined in 28 CFR Part 202 (“the Data Security Program”). If any time the CHTN, its member institutions/grantees, or any of its subsidiaries and affiliates meets the definition of a “covered person,” the CHTN shall promptly cease, or cause its member institutions/grantees, subsidiaries and affiliates to cease, all access to, use of, and any other activities related to “bulk U.S. sensitive personal data” or “United States Government-Related Data” (as defined under the Data Security Program) obtained or otherwise made available by the CHTN and shall promptly notify the CHTN Central Coordinator, Kiley Radin at kradin@chn.org who can take appropriate action.

The CHTN, its member institutions/grantees and its subsidiaries and affiliates shall not to share, disclose, transfer, or otherwise permit “access” (as defined under the Data Security Program) to “bulk U.S. sensitive personal data” or “United States Government-Related Data” (as defined under the Data Security Program) from or otherwise made available by CHTN to or by any entity, organization, individual, or governmental representative that meets the criteria of a “covered person” under the Data Security Program or otherwise provide access to such data to any “country of concern” (as defined under the Data Security Program). If the CHTN, its member institutions/grantees or any subsidiary or affiliate at any time determines that any such “covered person” or “country of concern” has obtained “access” (as defined by the Data Security Program) to such “bulk U.S. sensitive personal data” or “United States Government-Related Data” from or otherwise made available by the CHTN, the CHTN, member institution/grantee, subsidiary or affiliate shall promptly (i) terminate such “access” and (ii) notify the CHTN Central Coordinator, Kiley Radin at kradin@chn.org who take appropriate action.