APPROVED AND CORRECTED MINUTES

These minutes are disseminated to provide timely information to the Academic Senate. They have been approved by the body in question, and, therefore, they are the official minutes.

ACADEMIC SENATE MEETING
February 19, 2014


Visitors: Abby Kratz, Conor Wakeman, Rafael Martin

1. Call to Order, Announcements and Questions
The meeting was called to order by President Daniel at 2:03 PM. There were no announcements.

2. Approval of the Agenda
Tim Redman moved to accept the agenda. Richard Scotch seconded. The motion carried.

3. Approval of Minutes
Matthew Brown moved to approve the minutes. Kurt Beron seconded. The motion carried.

4. UTS175/180 Hybrid Policy
Speaker Leaf turned the floor over to Rafael Martin who presented a plan on the university’s implementation plan for UTS175/180 Hybrid policy. He provided a brief background on the conflict of interest/ conflict of commitment policies. In 2012 the Faculty Senate voted to defer the implementation of UTS 175. Since then the university has been working under a historical policy which was less stringent that was required. Rafael Martin noted that the university is fully compliant with Federal regulations in regards to conflict of commitment and conflict of interest. Conor Wakeman provided a brief presentation of a draft of a training module, see Appendix B, used to implement these policies. They then opened the floor to questions and discussion.
During discussion the following concerns were raised. There will be no other way to disclose without using the compliance module. Graduate students would be required to take the training module and discloses their conflicts of interest if they are assisting faculty with research, including their dissertation research. The only information that will be publicly disclosed under UTS180 will be that a management plan has been created. Rafael Martin assured the faculty that information that would be released would only be by written request, and would be as limited as possible.

Tim Redman moved to accept the resolution of disapproval on the UTS175/180 Hybrid policy with suggested amendments (Appendix C). R. Chandrasekaran seconded. The motion passed unanimously via a show of hands, 29/0

5. Speaker’s Report – Murray Leaf
   1. The CEP has discussed writing bylaws and decided that they do not need them. Their charge is sufficient. I have responded by suggesting topics that bylaws might cover that their charge does not, but the question is up to them.
   2. Speaker Leaf noted that we need additional member for the committee on intellectual property, to replace Stan Leibowitz, who is unavailable to serve. He asked for volunteers or suggestions. No one volunteered; no one suggested anyone.

6. FAC Report
   The Faculty Advisory Council met on Jan 23 and 24. Some of the main points were:

   1. Thursday morning, we met with Regent Ernest Aliseda. He started off by saying that he was there to hear what the FAC had to say. The FAC wanted to hear what he had to say. It was a bit of a slow start until each had said enough for the other to begin to respond to. In the course of the ensuing discussion Regent Aliseda noted that he had promised the legislature that he would act as though SB 15 had been passed, and said he intended to do so. Then it got more interesting. On the whole, the FAC was impressed with his judicial demeanor, evident thoughtfulness, and clear recognition of the importance of higher education.

   2. Steven Mintz Executive Director of the Institute for Transformative Learning, explained what the Institute is doing. My sense was that he was clearly responding to constraints imposed from above. I assume above means one or a few regents, but he did not say this. Their main project is not MOOCS, but an online certificate program in biostatistics. This has substantial support from the health campuses. They are not doing anything directly to identify ways new technologies can improve what is going on in classrooms on our campuses.

   3. We had what turned out to be a very interesting session with Stephen Harris and Chris Macon. The FAC’s initial concern in asking them to come was to ask about the source and purpose of the way space allocation on campuses has recently been driven by what seem to be rather foolish measures of efficiency, based only on the relationship between room capacity and the number of students in the class. They agreed, and had even more stories. The foolish measures originate with the coordinating board. But there
8. Resolution to create a Committee to Research Salary Compression
Since the February 5 Academic Council meeting, President Daniel has acted upon this resolution. The committee is made up of three members provided by the Provost, the Advisory Committee on the University Budget will provide three members, and Professor John Geissman has volunteered to serve on the committee.

9. MOOC Overview and Recommendations
The Academic Senate had asked the distance learning committee to write a report on MOOCs. They submitted their report for Senate review and approval. Ravi Prakash moved to accept the report. Viswanath Ramakrishna seconded the motion. The motion carried.

10. Announcement of 2014-2015 Elections
Speaker Leaf turned the floor over to Secretary David Cordell. Nominations for the FY15 Faculty Senate will open February 24, and close March 7. Should it be needed, elections for senators will begin March 17 and go through March 28. The Joint FY14 and FY15 Senate Caucus will be at 1 pm April 16 in the TI Auditorium before the April Senate meeting.

There being no further business, President Daniel adjourned the meeting at 3:32 PM.

APPROVED:  

Murray J. Leaf 
Speaker of the Academic Senate 

DATE: 19 Mar 2014
University of Texas System Faculty Advisory Council

Recommended Language Describing Information that Requires Encryption.

Considering that UT System policy will be to require encryption only to protect information that is confidential under FERPA and HIPAA or under contract, we recommend the following language for an appropriate policy.

The purpose of this policy is to describe the kinds of information the institutions within the University of Texas System may protect by requiring encryption\(^1\) of computers or other devices on which the information resides. Information that should be on encrypted devices is of the following three types:

A) information the university administration creates and uses for its administrative purposes

B) information the university is legally obligated to protect by FERPA and HIPAA

C) information that the university is bound to protect by contract.

The obligation to protect information does not imply ownership of that information.

Other work-related information is owned by faculty individually (D), and does not require encryption. It is the policy of the university to provide support and software to assist faculty who wish to protect this information as well.

A. Information the university owns for its internal business purposes. This information cannot be construed as owned by faculty although faculty may have access to it. If a faculty member retains any of this information, it should be on encrypted media. This information may be of the following kinds:

A.1. Business records maintained by any office under the Vice President for Business Affairs unless deemed public information.

A.2. Student records maintained by the University Registrar.

A.3. Records maintained by the Office of the President unless deemed public information.

A.4. Records maintained by the Office of the Provost. These records include those reported by the vice-provosts and academic deans to the Provost, and department chairs or others to the academic deans. Examples include personnel recommendations and upward evaluation of administrators. Exemptions include all information that must be made public under HB 2504 of 2009 and all information defined as

\(^1\) The purpose of encryption is to protect information on encrypted media or devices.
public information in the Texas Government Code, 5.A.552. These records include faculty salary information, teaching load information, and course evaluations.

A.5. Information on students, staff, or faculty that could be used for identity theft, impersonation, or embezzlement. Examples are university computer account net-ids and passwords, social security numbers, Medicare numbers, bank account numbers and information, credit/debit card numbers and information, taxpayer numbers, or copies of identifying documents.

B. Information that the university is legally obligated to protect by HIPAA and FERPA.

B.1. Medical records with personally identifiable information as defined in Health Insurance Portability and Accountability Act of 1996 (HIPAA).

B.2. Education records as defined in the Family Education Rights to Privacy Act (FERPA). Using the subdivisions of the Act itself, these are defined in the Act as meaning:

(a) those records that are:

1. Directly related to a student; and

2. Maintained by an educational agency or institution or by a party acting for the agency or institution.

(b) The term does not include:

1. Records that are kept in the sole possession of the maker, are used only as a personal memory aid, and are not accessible or revealed to any other person except a temporary substitute for the maker of the record.

2. Records of the law enforcement unit of an educational agency or institution, subject to the provisions of § 99.8.

3. (i) Records relating to an individual who is employed by an educational agency or institution, that:

   A. Are made and maintained in the normal course of business;

   B. Relate exclusively to the individual in that individual’s capacity as an employee; and

   C. Are not available for use for any other purpose.

   (ii) Records relating to an individual in attendance at the agency or institution who is employed as a result of his or her status as a student are education records and not excepted under paragraph (b)(3)(i) of this definition.

(4) Records on a student who is 18 years of age or older, or is attending an institution of postsecondary education, that are:

(i) Made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in his or her professional capacity or assisting in a paraprofessional capacity;

(ii) Made, maintained, or used only in connection with treatment of the student; and
(iii) Disclosed only to individuals providing the treatment. For the purpose of this definition, "treatment" does not include remedial educational activities or activities that are part of the program of instruction at the agency or institution; and

(5) Records created or received by an educational agency or institution after an individual is no longer a student in attendance and that are not directly related to the individual's attendance as a student.

(6) Grades on peer-graded papers before they are collected and recorded by a teacher.

[Authority: 20 U.S.C. 1232g(a)(4)]

http://www.ecfr.gov/cgi-bin/text-idx?ce=ecfr&sid=11975031b82001bed902b3e73f33e604&rgn=div5&view=text&node=34:1.1.1.1.33&idno=34

The implication of (a) is that all records maintained by the registrar are covered under FERPA. Federal courts have construed this as including disciplinary records. The clear sense of (b) (1), however, is that records maintained by individual faculty members for their own purposes and not intended to be communicated to others are not covered under FERPA and are therefore not confidential.

The implication of (b)(3)(i) is that records kept by faculty of their student employees, including Teaching and Research Assistants, are also not included, and that the university similarly has no obligation to assure that computers or media with these records should be encrypted under FERPA. It is desirable, however, to secure them as business records.

B.3. Research information that the university is required to protect as an explicit condition of the grant or contract that is providing funding for the research.

C. Information that the university has a proprietary interest in, and that it may protect.

C.1. Patentable discoveries or inventions in which the university has a proprietary interest, until such time as that patent is applied for or the invention is placed in the public domain, or the university expressly abandons its proprietary interest in accordance with Regents Rule 90101.

C.2. Information and documents that the university has contracted with faculty to produce, when retaining the information in a secure form is explicitly required in the contract. Examples are consulting contracts that faculty members may agree to, or on-line course material they may contract to create.

D. Work-related information that the faculty member owns and the university does not have an obligation to control includes the following:

D.1. All texts or other documents authored by faculty and subject to copyright, beginning with the author’s copyright that applies at the time of creation. This includes all notes, drafts, data, and compilations of relevant material that may be used in the creative process, whether exclusively authored by the faculty member or in the form of annotations and notes on material the faculty member has collected through the internet or by any other means.
D.2. Teaching materials such as course notes, syllabi, and web-site files created by the faculty member. The exception is if these materials were developed under written contract to the university in which the contract specifies that they belong to the university.

D.3. Letters of recommendation written by faculty in response to requests by students are not prohibited by FERPA and are not educational records maintained by the institution.

D.4. A note or an email from one faculty member to another about a student is not an “educational record” in the meaning of FERPA because it is not a record maintained by the institution. According to the court, “FERPA implies that education records are institutional records kept by a single central custodian, such as a registrar” (Owasso Independent School Dist. v. Falvo, 534 U.S. at 433-45).

D.5. Direct communications with students. Examples include exchanges of emails regarding course assignments or academic progress, appointments, or general advice and counseling.

D.6. Professional correspondence not subject to copyright, such as correspondence with colleagues; artistic, literary, scholarly and scientific societies; publishers; potential publishers; funding sources; and professional associations such as faculty unions and the American Association of University Professors.

D.7. Private non-professional correspondence through university provided emails or other information services.

D.8. All communications with federal agencies protected by the Privacy Act of 1974.
was also the very real problem that there were no good alternative measures, or additional measures, that could get at actual demand. The upshot was that we agreed to work with them to produce such measures. As a foundation for the effort, the FAC decided to recommend that there should be a facilities oversight committee on each campus, with a majority of its members from the faculty, who make recommendations for that campus.

We discussed these recommendations with the Provost in the academic council. Our conclusion was that it is more likely that the system is responding primarily to the demands of a particular regent, and that the FAC recommendations would not help.

4. The FAC passed a number of resolutions, most of which also bear on UTD.

These included:

1. A resolution on the kinds of information that should be on encrypted media on faculty computers. This was intended to implement the Chancellor's statement that the only such information would be what the university was required to protect by HIPAA, FERPA, or contract. The resolution included clear language about what this should mean. I attach this resolution as an appendix.

2. A resolution to enforce regent's rules on upward evaluation of administrators, and to assure faculty participation in searches for department heads and deans.

3. A resolution that peer observation of teaching should be used for improvement of teaching, and separate from evaluation.

5. We discussed revising Regents Rules 90101, 90102, and 90103, on intellectual property rights with Dan Sharpnorn and Vice Chancellor Reyes. We agreed to propose changes. The most important change concerns section 9 of Rule 90101, which reads:

Sec. 9 Use of Research Data. Research data or results created by an employee are owned by the Board of Regents and, except to the extent that rights to such research data are contractually assigned or licensed to another by the Board of Regents, the creator shall have a nonexclusive license to use such data for nonprofit educational, research, and scholarly purposes within the scope of the employee's employment, subject to adherence to other provisions of this Rule.

I asked Mr. Sharpnorn what he thought it was intended to accomplish. He did not know. I asked if anyone on FAC saw a purpose in it. No one did. My recommendation, therefore, is that it should be removed. There are other changes but they are relatively minor. The FAC did not make these recommendations, however, because Dr. Reyes advised us that the Chancellor would soon appoint a task force to review the rules for system, which would have representation from the FAC. The FAC therefore agreed instead to endorse this plan and offer to recommend faculty members.

7. Student Government Liaison Report
   No report was given.
Conflicts of Interest and Commitment for Faculty and Researchers

UT Dallas Compliance Training Modules

Policy Terms

• What is a Conflict of Interest?
  • UT Dallas defines a Conflict of Interest as a situation in which a significant financial interest could directly and significantly affect the performance of an employee's institutional responsibilities.

• What is a Conflict of Commitment?
  • UT Dallas defines a Conflict of Commitment as a situation in which:
    • An outside commitment could directly and significantly interfere with the performance of an employee's institutional responsibilities; or,
    • An employee uses UT Dallas resources without authority or approval in connection with an outside commitment.

• What are Institutional Responsibilities?
  • Institutional Responsibilities are the work you perform for UT Dallas, including research, research consultation, professional practice, teaching, educational activities, administrative duties, and committee membership.
What is the intent of conflict of interest and commitment policy at UT Dallas?

- To ensure compliance with federal regulations and UT System Regents Rules and Regulations;
- To protect the integrity of research and scholarship conducted at UT Dallas; and,
- To prevent the negative impact of perceived or actual conflicts on:
  - the reputation and credibility of UT Dallas; and,
  - the ability of UT Dallas faculty and staff to attract funding and new faculty and students.

Who is expected to comply with the policy?

The policy applies to:

- all UT Dallas faculty; and,
- any staff member or student at UT Dallas who is responsible for the design, conduct or reporting of research, including but not limited to:
  - research staff;
  - postdoctoral trainees; and,
  - graduate students.

If you are unsure whether you need to comply, please contact the Office of Research Compliance (ORC) by phone (972-883-4718) or email (conor.wakeman@utdallas.edu).
Will this training help me determine if I have anything to disclose?

- This training module will inform you of the policy requirements and help you determine if you have a financial interest or outside commitment that needs to be disclosed.
- If at the end of this training module you determine you have nothing to disclose, you will certify this fact, and this certification will meet your annual disclosure requirement.
- If you determine you have financial interests or outside commitments that require disclosure, you will be directed to an online disclosure tool where you can provide details of potential conflicts.

How do I comply with the policy?

- You can comply using an online disclosure tool provided by the ORC.
  - You must disclose financial interests and outside commitments that reasonably appear to be related to your institutional responsibilities.
  - You are entrusted to determine whether an interest or commitment is related.
- What is related?
  - An interest or commitment is related if your performance of your institutional responsibilities at UT Dallas appears to directly and significantly affect either your financial interest in an outside entity, or the financial interest of such an entity.
Do all related financial interests require a disclosure?

- No. A disclosure is triggered by related financial interests that fall into the following categories:
  - Compensation of more than $5,000 per year from a single entity;
  - Equity interests that represent more than $5,000 fair market value;
  - Equity interests held in private companies; or,
  - Gift of more than $250 in value.
- A disclosure is also needed for related fiduciary interests you hold in for-profit and non-profit entities.
  - A fiduciary interest is a position which an entity has authorized to manage and protect property, money, and other assets.

Are there any exclusions?

Yes. The following financial interests do not trigger the need for a disclosure:

- Compensation or reimbursements you receive from UT Dallas, UT System, or another UT institution.
- Interests in and income from investment vehicles, such as mutual funds and retirement accounts.
- Gifts received from family members.
- Travel reimbursements you receive from a government agency, higher education institution or affiliated research institute.
- Assets (e.g., rental properties) that do not reasonably appear to be related to your institutional responsibilities.
Office of Research Compliance

Do all outside commitments need prior approval?

- No. You are expected to request prior approval for certain outside commitments. These include:
  - Compensated commitments with business entities that are related to your institutional responsibilities (e.g., consulting in your field of expertise).
  - Uncompensated commitments with business entities that are related to a conflict of interest.
  - Uncompensated commitments on a board of directors that are related to your institutional responsibilities.

- Outside commitments may not exceed more than one day per week, averaged over the current semester.

Office of Research Compliance

Are there any exclusions?

- Commitments performed by faculty members appointed on a 9-month basis during those months in which they are not working for UT Dallas, unless the commitment is related to a conflict of interest.

- Commitments performed for local municipal, social and religious organizations that are not related to your institutional responsibilities.

- Commitments for professional journals and societies, colloquia and conferences, and advisory committees and review panels.
What happens to my disclosure?

- **Financial Interests**
  - Your financial interests are reviewed by a Conflict of Interest Specialist in the Office of Research Compliance (ORC) to ensure your disclosure is complete and accurate.
  - If it is determined that a potential conflict of interest exists, ORC will work with you to develop a Conflict of Interest Management Plan.
  - Most disclosures do not present the possibility for a conflict of interest.

- **Outside Commitments**
  - Your requests for prior approval are reviewed by your organizational or department head or dean, as determined by your school.
  - Most requests do not present the possibility for a conflict of commitment and are approved.

Public Accessibility

- **UT Dallas**
  - In accordance with federal and state law, UT Dallas is obligated to make public specific information regarding managed conflicts of interest related to sponsored research conducted at UT Dallas.
  - UT Dallas will provide information required upon request under the Texas Public Information Act.

- **UT System**
  - UT System has developed an electronic database that will make publicly available information regarding managed conflicts of interest at all UT System branches.
  - UT Dallas will provide information regarding managed conflicts of interest on an annual basis for the UT System database.
Applicable Rules and Regulations

- US Public Health Service (including the National Institutes of Health)
  (42 CFR Part 50 Subpart F, 45 CFR Part 94)
- National Science Foundation Grantee Standards
- UT Systemwide Policy 175
- UT System Board of Regents Rule 30104

What if I have questions?

Please direct all questions to the Conflict of Interest program in the Office of Research Compliance:

Sanaz Okhovat, Senior Director
972-883-4579
sanaz.okhovat@utdallas.edu

Conor Wakeman, Conflict of Interest Specialist
972-883-4718
conor.wakeman@utdallas.edu
Case Study #1

- Dr. Green, assistant professor of Economics
- Philately
  - Dr. Green collects and studies stamps as a personal hobby. His collection has a value in the tens of thousands.
  - Dr. Green spends several weekends each year organizing and expanding his stamp collection, including attending events of the American Philatelic Society.
- American Economic Association
  - Dr. Green serves as a committee member for the AEA, and he travels several times each year to Nashville to participate in AEA committee meetings and conferences.
  - Dr. Green receives reimbursement of travel expenses from the AEA.

Response to Case Study #1

- Dr. Green, assistant professor of Economics
- Philately
  - Even though Dr. Green's collection has a value in the tens of thousands, he does not disclose the financial interest because it is not related to his institutional responsibilities.
  - Dr. Green does not request approval for the time he spends on his stamp collection because the activity is personal in nature and not related to his institutional responsibilities.
- American Economic Association
  - Because the AEA is a non-profit, professional society and Dr. Green volunteers for the position, he does not disclose the travel reimbursement and does not request approval for the time commitment.
Quiz for Case Study #1

- Question #1: TBD
- Question #2: TBD
- Question #3: TBD

Case Study #2

- Dr. Orange, senior lecturer and research scientist, Chemistry
- Middle County Community College
  - Dr. Orange teaches a summer course on organic chemistry for MCCC.
  - Dr. Orange has a 9-month appointment at UT Dallas, and he teaches the course during the summer months when he is not on UT Dallas payroll.
- Super Chemical Products Corporation
  - Dr. Orange provides technical advice for Super Chemical on the development of products that use technology similar to Dr. Orange's research at UT Dallas.
  - Dr. Orange plans to commit 16 days per semester of his appointment to his consulting work for Super Chemical.
Response to Case Study #2

- Dr. Orange, senior lecturer and research scientist, Chemistry
- Middle County Community College
  - Because Dr. Orange has a 9-month appointment, he does not request prior approval for his commitment to MCCC because he teaches the course when he is not on UT Dallas payroll.
  - Dr. Orange discloses his compensation from MCCC because he is compensated more than $5,000 for the course.
- Super Chemical Products Corporation
  - Dr. Orange requests prior approval for his time commitment to Super Chemical because he is being compensated by a company that manufactures products in the same area as his research at UT Dallas.
  - Dr. Orange discloses his consulting fee from Super Chemical because he receives more than $5,000.

Quiz for Case Study #2

- Question #1: TBD
- Question #2: TBD
- Question #3: TBD
Case Study #3

- Dr. Comet, professor of Materials Science and Engineering
- National Science Foundation
  - Dr. Comet reviews grant proposals for the National Science Foundation, and she travels to Washington, D.C. three days per year to participate in the review panel.
  - The NSF sponsors Dr. Comet's travel expenses for the panel.
- Harmonic Materials, LLC
  - Dr. Comet co-owns and serves as Chief Technology Officer for Harmonic Materials, which she founded to commercialize technology she invented. The company sponsors Dr. Comet's research at UT Dallas to further develop the technology.
  - Dr. Comet plans to commit 17 days per semester of her appointment to Harmonic Materials.

Response to Case Study #3

- Dr. Comet, professor of Materials Science and Engineering
- National Science Foundation
  - Because the NSF is a government agency, and Dr. Comet volunteers for the position, she does not disclose the travel reimbursement and does not request approval for the time commitment.
- Harmonic Materials, LLC
  - Dr. Comet requests prior approval for her time commitment to Harmonic Materials because she is being compensated by, and owns part of, a company that could benefit from the results of her research at UT Dallas.
  - Dr. Comet discloses her ownership stake in Harmonic Materials because the company is privately held. She discloses her salary from Harmonic Materials because she receives more than $5,000 per year. She discloses the fiduciary interest she holds in Harmonic Materials as CTO.
Quiz for Case Study #3

- Question #1: TBD
- Question #2: TBD
- Question #3: TBD
- Question #4: TBD
Resolution as amended and approved:

The Academic Senate of the University of Texas at Dallas does not approve the draft policy titled "Conflict of interest and Commitment for Faculty and Researchers." The Senate further recommends that the UT System and UT Regents rescind the revised policy UT System Policy 175 (UTSP 175).

The Academic Senate of the University of Texas at Dallas recognizes that the draft policy is required in order to implement UTSP 175. The Senate further recognizes that it has been constrained by a requirement that the standards and procedures imposed by the National Institutes of Health on research that they fund should be imposed on all research whatever, funded or unfunded. We understand that this requirement originated with the UT Regents.

The Academic Senate considers this requirement impractical, burdensome, intrusive and perhaps illegal. Regents have neither the authority nor the expertise to override the federal regulations.

The theory justifying the Regents' demand is that the difference between NIH requirements and other requirements is only a matter of degree. The NIH requirements are "more strict." If this were so, it would follow that in meeting NIH requirements the university would also be meeting all other requirements. This is false for three main reasons.

First, it is inconsistent with missions of these funding agencies, and all others. The purpose of the NSF is not only to fund research; it is to encourage it. The purpose of the NIH is parallel. The purposes of other funding agencies are similar. The manifest consequence of the Regental requirement is to discourage research and encumber the university's efforts to support it.

Second, the regulations are designed for different contexts. NIH requirements must guard against their funds being used to support research for very large and wealthy international corporations, including tobacco companies, pharmaceutical companies, and producers of medical technology. There are fewer or no such interests to guard against in fields supported by other agencies, public and private. Applying NIH regulations in non-biomedical fields distorts their meaning in all fields. Insisting that the regulations of the NSF or other agencies cannot be applied to activities that those agencies are responsible for is probably illegal.

Third, applying the policy to unfunded research amounts to applying it to thinking as such. Federal regulations do not apply to unfunded research because it would be clearly unconstitutional to attempt to regulate it. It is equally unconstitutional for the Regents, or the UT System, to attempt to do so.

The Senate therefore recommends that:
1. Conflict of interest policies for research should apply only to funded research.
2. Conflict of interest in research should be addressed only under an appropriately revised UTSP 175.
3. Research conflict of interest policies should be consistent with the requirements of the funding agencies.
4. Conflict of commitment questions should be addressed only under UTSP 180.
5. University policies implementing UTSP 175 and UTSP 180 should be separate, although the disclosures may be done through a single website.