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OFFICE OF ACADEMIC AFFAIRS

**Intellectual Property for Educational Materials
White Paper**

CU System Office of Academic Affairs
CU System University Counsel
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Introduction

The University of Colorado System has two policies on intellectual property (IP) related to educational material:

- [Regent Policy 5K](#): –Intellectual Property that is Educational Material, created in 2003¹
- [APS 1014](#): Intellectual Property That is Educational Materials, created in 2003 and last updated in 2013²

In Spring 2021, anticipating the need to review both policies, the Vice President of Academic Affairs organized a working group of CU faculty to discuss current issues, challenges, and other institutions' policies related to this type of IP. Special thanks to the faculty members of the working group:

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As context for review of Policy 5K and APS 1014, this report provides an overview of IP ownership specific to educational material and policy examples from other institutions of higher education.

Framing the Discussion and Defining Scope

Definitions vary widely when discussing the IP generated by faculty. Broadly speaking, IP is considered those original works covered by Intellectual Property law, which includes patent, trademark, and copyright. Some discussions, and indeed [CU Regent Policy 5.J](#)³ and [APS 1013](#)⁴ focus on IP from research that can be patented/licensed. IP from research and discoveries that can be patented will not be discussed in this paper. Instead, our scope is limited to IP that is educational material, which is typically subsumed within a broader category of “scholarly works” or “scholarly and artistic works.” For the sake of clarity in beginning this paper, we will introduce working definitions to distinguish IP for educational material and IP for scholarly works, knowing that these working definitions will not apply universally.

Working Definitions

Scholarly Works – Some faculty have an expectation to engage in scholarly/creative/research activities. The result of those activities, e.g., papers, books, works of art, music, drama, etc. are generically called scholarly works. Faculty have a right to come into agreement with the campus over potential licenses to their scholarly works to support goals such as Open Access, and in fact the Boulder campus faculty have done so in 2015 putting in place a [Campus Open Access Policy](#). When an institution has

specific policies about patentable scholarly works, such as CU, those policies supersede any general IP policies on scholarly works.

Educational Materials – Educational materials are those produced by faculty to distribute to students for the express purpose of supporting their learning in a specific course. Materials used to support student learning but covered by other definitions or copyrights are not considered educational material. Textbooks, although able to support a specific course are not, for the purposes of this paper, considered educational materials, but rather, scholarly works.

We also recognize there are some educational and scholarly materials made available for free access via Open Educational Resources (OER) initiatives or with a license to use material via Open Access (OA) policies. CU is active in this area of academic innovation, receiving grant funding from the Colorado Department of Higher Education to support [System-wide OER work](#)⁵ and has faculty from all four campuses and [each CU library engaged](#)⁶ in these efforts. OA and OER are clearly impacted by institutional IP policies. We will not be surveying what other institutions do with respect to OA and OER in this white paper but will consider them explicitly in separate policy recommendations.

Copyright Law

A starting point for an overview of IP for educational materials is with copyright law. Title 17 of the [United States Copyright Law](#)⁷ is applicable to IP that is educational material. The law says that original works by authors, “fixed in any tangible medium of expression,” are protected for a period of time and identifies categories of protected works including “...literary works; musical works, including any accompanying words; dramatic works, including any accompanying music; pantomimes and choreographic works; pictorial, graphic, and sculptural works; motion pictures and other audiovisual works; sound recordings; and architectural works.”⁸ Copyright law does not extend protections “to any idea, procedure, process, system, method of operation, concept, principle, or discovery, regardless of the form in which it is described, explained, illustrated, or embodied in such work.”⁹ So a faculty member or instructor for a course may introduce an idea for discussion in class, or teach a concept, and the idea or concept itself is not subject to copyright protection, but rather the tangible medium in which it is delivered is what is protected (e.g., a deck of PowerPoint slides that contain the idea of concept).

Copyright Law and Work-for-Hire

While copyright law states that ownership of copyright lies with the author or creator of the work, it also notably includes the principle of “works made for hire” which grants copyright ownership to the employer of the author if the work is prepared within the scope of one’s employment.¹⁰ Copyright ownership can remain with the author if 1) a written agreement is created with the employer specifying that the work is not made for hire¹¹ or 2) through the transfer of ownership to the author, which also requires written agreement.¹² The owner of the copyright retains exclusive rights to reproduce, prepare derivative works, distribute copies (sale or other transfer), and in some cases, perform or otherwise display the work to the public.¹³

Ownership of Educational Material at Universities

Copyright ownership of educational material in university settings is not addressed explicitly in Copyright law. Specific to faculty, the historical practice at many universities related to scholarly works has been to observe “academic convention,”¹⁴ or the “academic exception”¹⁵ to the work-for-hire principle, which is that faculty own the scholarly and artistic works they create. University of Colorado IP policies for educational material reflect this academic tradition of faculty ownership.

For more on copyright issues generally, and the history and law related to faculty ownership, see this [April 2020 IP overview](#)¹⁶ from the American Association of University Professors.

Growing Complexity

Copyright ownership of educational material at universities has become increasingly complex in the past two decades. Two reviews of university IP policies, one from 2005 and another from 2018, show a multifaceted picture of ownership in university policies. In the [2005 study](#),¹⁷ IP policies for online course materials were analyzed from 42 research institutions. More than 50% of the university policies reviewed did not assert ownership of “traditional” scholarly works or of educational materials such as tests and syllabi but did claim ownership of courseware and online materials. Similarly, more than half of the universities maintained a “royalty free license” to use materials. A variety of additional features were common in more than 50% of the university policies.

More recently, in a presentation about key IP Policy elements at the 2018 National Association of College & University Attorneys annual conference, Madelyn Wessel, University Counsel for Cornell University, noted “many differences in how institutions, even those viewed as similarly situated (for example, large research institutions), handle copyright and/or IP more generally.”¹⁸ Using examples from institutional policies, Wessel discusses 12 “core issues” that universities should contemplate in considering policy revision including, for example, work-for-hire, scholarly rights, differences in faculty and other employees with respect to works produced, online course materials, and student copyright. Wessel suggests the need for updates to copyright and IP policies given significant shifts in how copyrightable works are developed now, and their potential uses since many were originally created in a “purely print environment.”

Survey of University Policies

The remainder of this white paper reviews IP/copyright policies from ten public university systems, the purpose of which is to provide context and background for discussion of possible updates to CU’s IP policies for educational material. Most policies are at the level of the governing board and/or system administration; in one case a policy exists within a Faculty Manual. Some institutions have created additional guidance to clarify ownership through a FAQ or website dedicated to the topic. While the focus of this paper is IP and copyright for educational material, note that some of the policies reviewed are inclusive of all intellectual property generated by faculty, with separate sections about educational material (a.k.a.,

academic materials, instructional materials). Also note that policies were gathered via internet research, which may or may not provide an inclusive picture of each university’s approach.

The table below identifies the institutions included in this review, arranged by IP ownership emphasis (as judged by the authors of this whitepaper):

Institutional Policies Reviewed by Ownership Emphasis

Ownership Emphasis	Institution	Institutional Online Presences*
Faculty	University of Minnesota System	University of Minnesota Online
	Univesrity of Colorado System	CU Online UCCS, Denver, Boulder have online programs by campus
	Colorado State University System	CSU Online CSU Global
University	Arizona Board of Regents (governs ASU, University of Arizona and Northern Arizona University)	ASU Online University of Arizona Online Northern Arizona University Online
	Purdue University System	Purdue Online Purdue Global
Shared	Univesrity of Wisconsin System	UW System E-campus
	University of Texas System	finish@UT [^]
	University of Michigan	Michigan Online
	University of California System	University of California Online
	Pennsylvania State University System	Penn State Online Penn State World Campus

**Some campuses within these Systems have online programs and offerings in addition to broader institutional or System efforts. For the sake of simplicity, this is not a comprehensive list of all online initiatives at these institutions. [^] "finish@UT" from the UT System focuses specifically on degree completion programs offered online.*

In review of these policies, it seemed that some were more clearly communicating that faculty own the material they create, while others seemed more focused on establishing university ownership, while still others occupied a large middle ground with various models of shared ownership between faculty and the university. The policies exist on a continuum more than within distinct categories, but, for the purposes of this paper, policies are grouped according to “ownership emphasis” – faculty, university, and shared. Note in the table, for informational purposes, we also have included types of “online presences” currently in place for each institution as acknowledgement that updates to institutional IP and copyright policies should consider issues arising from growth in online education programs and initiatives.

I. Faculty Ownership Emphasis

- A. The [University of Minnesota Regent Copyright Policy](#)¹⁹ asserts faculty ownership rights of the academic works they create, including scholarly, creative, and "pedagogical" work such as "course syllabus, test, or class notes." Exceptions to faculty ownership that are typical of IP policies are included (i.e., directed works; commissioned works; works created in connection with administration; and externally sponsored works where university ownership is specified). Work-for-hire is also discussed in Regent policy but with emphasis that "...academic works (are) created and owned by faculty under this policy...."

The Copyright Ownership [Administrative Policy](#)²⁰ at Minnesota acknowledges that employers own copyright of works created by their employees per Copyright law, but then also points out that the law "permits employers to vest that copyright ownership in its employees in designated works or classes of works." The policy then further speaks to work-for-hire, specifying ownership rights for faculty and employees in "faculty-like" appointments:

"Consistent with federal law, the University owns the copyright in works created by University employees in the course of their employment except for ownership rights vested in faculty, University employees holding a "faculty-like" appointment and students as provided in Board of Regents Policy: Copyright."

A [Copyright Policy Background and FAQ](#)²¹ provides guidance about the Minnesota policies and similarly reinforces faculty ownership of "scholarly and pedagogical works" stating that a "faculty member owns copyright to all their independent academic works, regardless of the form of the course materials or the modality of the course."

- B. The [University of Colorado System Regent Policy 5K](#)²² on IP that is educational material states that "ownership and copyrights in scholarly and artistic works...will be the sole and exclusive property of the creator or author" with exceptions for works produced as part of a sponsored program; where works are assigned for creation by employees who are not faculty; and in the case of use of "substantial university resources" in the creation of the work. These are typical exceptions.

[APS 1014 - Intellectual Property that is Educational Material](#),²³ the implementing administrative policy for Regent Policy 5K, limits the university's right to use faculty-authored educational materials to two instances – 1) the planned-for course materials may be used when a faculty member becomes unavailable to teach a course previously assigned; and 2) when the university has administrative requirements that need to be satisfied, such as in an accreditation process. The university does not retain license for use or re-use of educational materials in any other case.

- C. The Colorado State University System has [a Board of Governors' Policy on Intellectual Property](#),²⁴ which taken alone with no other context, messages an emphasis on broad university ownership of IP. The policy states that:

“...academic materials...resulting from the teaching, service, and research or investigation, conducted by University employees with the support of University resources shall become the property of the University or its designee,”

The statement references that the full policy resides in the Academic Faculty and Administrative Professionals Manual. [Section J: Rights and Responsibilities of Creative Works](#)²⁵ is extensive, and its definitions are key to understanding the policy as one that emphasizes faculty ownership. Section J.1. states that “the university will continue the tradition of not claiming ownership or a share of the proceeds from scholarly works such as academic materials...” as long as university resources are not used in their creation. Note that the definition of “university resources” expressly excludes a faculty member’s time, office, computer, and use of the library. Also, similar to the working definition of educational material assumed in this paper, CSU’s academic materials are “materials used for pedagogical purposes.”

So, the logic is that the university does not claim ownership of academic materials created with standard resources available to a faculty member as part of their employment. From Section J.1: “A faculty member’s general responsibility to produce scholarly and creative works does not constitute an express commission of Works” (“works” include inventions, academic materials, publications, and other creations). In Section J.12 on academic materials, the policy further states that faculty “are sole copyright holders of the content of their own lectures,” regardless of how delivered, “traditional classroom delivery or by any other means.” Similar assurances that faculty own the academic materials they create are threaded through the policy.

The policy does articulate university ownership of works “developed using University Resources” (Section J.5) and specifies that the university has an “exclusive license to use and market academic materials” commissioned by the University as long as there is a written agreement between CSU and the faculty member (Section J.12.2.). A full reading of this policy is recommended.

Excerpts from the Minnesota, Colorado, and CSU policies are available in Appendix A.

II. University Ownership Emphasis

- A. The [Arizona Board of Regents Intellectual Property Policy](#),²⁶ which governs ASU, University of Arizona, and Northern Arizona University, claims Board ownership of IP created within the scope of employment or with significant university resources. It goes on to state a “scholarly exception” and defines scholarly works that fit within the exception, including “lecture and instructional notes.” The policy then seems to contradict itself in stating that “course and instructional materials, in any form, such as video lectures, power point presentations, and course materials provided to students, unless otherwise set forth in a university policy or separate written agreement” are not scholarly works. Our interpretation is that course and instructional materials are in fact owned by the university and not the author unless a written agreement exists stating otherwise. Additional policy excerpts included in Appendix B suggest an emphasis on university ownership.

- B. The [Purdue University System Intellectual Property Policy](#)²⁷ defines Purdue IP as “intellectual property that arises in any part of the course of employment or enrollment at the university, or in the course of a work-for-hire relationship or visiting scholar relationship with the university.” Exceptions are stated, including allowing authors “to retain and manage the copyright to Instructional Copyrightable works, and Scholarly Copyrightable Works, subject to a license in favor of the University....” The license allows the university “to use, duplicate, and distribute the instructional or Scholarly Copyrightable Work for all research and educational purposes of the University.”

Connected to this policy is Standard [S-19: Courseware and Online Modules](#),²⁸ which was put into place in 2019 without broad faculty engagement, drawing [complaints from Purdue’s AAUP Chapter](#)²⁹ and attention in [higher education press](#).³⁰ Courseware and online modules are “commissioned copyrightable works” at Purdue, with the university retaining the rights of ownership, along with license “to update and creatively modify Courseware and Online Modules, including Instructional Copyrightable Works deployed with them...” regardless of whether the Author continues employment with Purdue.

Excerpts from Arizona and Purdue policies are available in Appendix B.

III. Shared Ownership Emphasis

The following university policies represent the middle ground with language that seems to balance faculty and university ownership interests to varying degrees.

- A. The University of Wisconsin System policy on [Copyrightable Instructions Materials Ownership, Use, and Control](#)³¹ specifies a range of “developmental conditions” for copyrightable instructional materials, and then ties ownership interests to each condition (see Sections II.B. and II.C.). Faculty own materials created with no or minimal institutional support, and the university claims ownership in the case of substantial system or institutional support or in the case of work-for-hire. With university ownership, Section III.B. further establishes principles that are required as part of written agreements including that “internal use” of instructional material is allowed by any means (such as, digital and multimedia formats) and that “sharing of instructional materials should be encouraged” internally.
- B. The [University of Texas System Regent Rule 90101](#)³² asserts that IP is owned by the Board of Regents, exceptions are stated, and that all employees are subject to this rule. It goes on to say that despite Board ownership, the Board will not seek to own copyright of educational materials or other scholarly and artistic works and “creators are encouraged to manage their copyrights in accordance with the guidelines concerning management and marketing of copyrighted works consistent with applicable institutional policies.” Further, the Board is allowed to retain a one-year license to use, create derivative works, etc., of educational materials in order to continue teaching a scheduled course should an instructor leave the university.

Noteworthy also, the Texas System has a guide to copyright called the [Copyright Crash Course](#)³³ created by the University of Texas Libraries. Although broader than copyright ownership for educational materials, the website is a communication tool that recognizes the complexity of ownership issues, with sections titled “[Sorting through Ownership](#),” and “[Own, Manage, Share](#),” for example, that are worth review.

- C. The [University of Michigan Policy](#)³⁴ claims university ownership of copyrighted works of all employees under the “default” principle in copyright law (work-for-hire). The preamble to the policy, however, says that Michigan “strives – despite the legal default – to place copyright with the creators of scholarly, academic, and artistic works.” After mention of the default rule, the policy formally transfers copyright ownership of scholarly works (which include lecture notes and course materials), to faculty authors. Conditions for the transfer of ownership are stated, including 1) the university’s non-exclusive right to use the works for “educational and administrative purposes consistent with its educational mission and academic norms,” and 2) the right to store scholarly works in “institutional repositories...where faculty can control the timing and scope of access to their copyrighted works.” Common exceptions to faculty ownership are also stated.
- D. At the University of California System, there are two related IP policies -- a [Copyright Ownership Policy](#)³⁵ (which like Minnesota has its own [FAQ](#))³⁶ and a policy on [Ownership of Course Materials](#).³⁷ The Copyright Ownership Policy specifies seven categories of works and identifies ownership of each. Like Michigan, UC formally transfers copyright ownership of scholarly and aesthetic works (which include course materials) “to academic authors of the works who prepared those works using independent academic effort.” Typical exceptions are stated (e.g., sponsored works, commissioned works, contracted works, use of significant university resources, and anything that would put UC in violation of law, policy, or contract). Unlike Michigan, the UC policy does not lead with mention of the default (work-for-hire) principle from Copyright law but goes directly to discussion of ownership transfer. The policy also includes a section on release of university ownership rights in certain circumstances (Section III.C), with an agreement that “the University is granted a free-of-cost, nonexclusive, worldwide license to the work consistent with the University’s missions of teaching, research, and public service.”

UC’s supplemental Policy on Ownership of Course Materials operationalizes faculty ownership of course materials in a unique way. The policy states that “designated instructional appointees” have ownership rights of course materials. These appointees are defined in policy as “university employees who serve as Instructors of Record and have a general obligation to produce course materials. Included are all members of the Academic Senate and Clinical Professors. Appointees in other academic titles may also be designated by the President.” The policy permits the university to retain a “fully paid-up, royalty-free, perpetual, and non-exclusive worldwide license to any Course Approval Documents for the purpose of continuing to teach the course of instruction for which the documents were prepared, with the non-exclusive right to revise and update them as required for this purpose.”

Like Texas, UC has worked to simplify communication of the complexities of copyright ownership via a [Copyright FAQ website](#)³⁸ which includes sections such as “What do I own?”, “Works Created at UC”, and the chart shown below, which is an effort to capture Author versus University Ownership in a relatively simple way:

<p>Copyright retained by originator/author:</p> <ul style="list-style-type: none"> • Scholarly/aesthetic works created by academic authors using independent academic effort. • Course materials (other than Course Approval Documents). • Personal works prepared outside scope of employment. • Student works. 	<p>Copyright normally retained by University:</p> <ul style="list-style-type: none"> • Institutional works created by UC employees within the scope of their employment. • UC sponsored works. • UC commissioned works. • Works acquired by assignment or will.
<p>Copyright normally governed by written agreements:</p> <ul style="list-style-type: none"> • Course materials created with use of <i>Exceptional University Resources</i>. • Personal works outside scope of job created with use of university facilities. • UC sponsored works. • UC commissioned works. • Contracted facilities works. • Special University Projects. 	<p>Nonexclusive license retained by University to use works for education and research:</p> <ul style="list-style-type: none"> • UC sponsored works not owned by university. • UC commissioned works not owned by university. • Course approval documents created by designated instructional appointee.

E. Pennsylvania State University has [multiple IP policies](#). The policy on [Ownership and Management of Intellectual Property](#)³⁹ has a section about “Instructional and Scholarly Intellectual Property”. The overall emphasis seems to be faculty (creator) ownership of instructional material, unless the material is a sponsored work or university-directed work defined by written agreement, in which case the university owns. Like the Wisconsin policy, Penn State encourages sharing of “instructional intellectual property within the University for internal instructional usage.”

Penn State’s policy is distinctive in that license for use of instructional material IP is specified in both directions, each party to the other in certain circumstances. Creators grant the university the “non-exclusive, royalty-free right and license to use any instructional IP” as long as the creator is part of the University community and the works are within the scope of employment; and with university-directed works, the university grants a similar license to creators “for their own limited purposes outside of the University.”

An additional Penn State policy on [Courseware](#)⁴⁰ details parameters of university-directed works versus “university personnel-initiated works,” stating university ownership of the former and author ownership of the latter in most cases. This policy vests authority over courseware resulting from university personnel-initiated works with the “department or program that exercises the University’s non-exclusive, royalty-free right to use,” but only after consulting the author.

Excerpts from Wisconsin, Texas, Michigan, California, and Penn State policies are in Appendix C.

Conclusion

This policy overview is intended to support future review and discussion of CU's intellectual property policies that focus on educational material. The clearest takeaway from this analysis is that in addition to many standard elements of these policies, there is variation in both how faculty and university interests are balanced, and in language used to describe the balance with respect to ownership of IP for educational material.

Citations

- ¹ University of Colorado (last revised in 2003), [*Regent Policy 5.K: Intellectual Property that is Educational Material.*](#)
- ² University of Colorado (last revised in 2013), [*APS 1014: Intellectual Property that is Educational Materials.*](#)
- ³ University of Colorado (last revised in 2006), [*Regent Policy 5.J: Intellectual Property on Discoveries and Patents for their Protection and Commercialization.*](#)
- ⁴ University of Colorado (last revised in 2013), [*APS 1013: Intellectual Property on Discoveries and Patents for their Protection and Commercialization.*](#)
- ⁵ University of Colorado, [*Open CU Website.*](#)
- ⁶ CU Connections (2020), [*CU Faculty Voices: CU system libraries support open access.*](#)
- ⁷ 17 U.S.C. (1976), [*Copyright law of the United States and related laws contained in Title 17 of the United States Code.*](#)
- ⁸ [*17 U.S.C. Section 102\(a\) \(1976\).*](#)
- ⁹ [*17 U.S.C. Section 102\(b\) \(1976\).*](#)
- ¹⁰ [*17 U.S.C. Section 201\(b\) \(1976\).*](#)
- ¹¹ [*17 U.S.C. Section 201\(b\) \(1976\).*](#)
- ¹² [*17 U.S.C. Section 201\(d\) and Section 204 \(1976\).*](#)
- ¹³ [*17 U.S.C. Section 106 \(1-6\) \(1976\).*](#)
- ¹⁴ Flaherty, Colleen (2020), [*IP Problems*](#), Inside Higher Education.
- ¹⁵ Twigg, C.A. (2000), [*Who owns online courses and course materials? Intellectual property policies for a new learning environment*](#), Monograph from the Center for Academic Transformation, Troy, NY.
- ¹⁶ American Association of University Professors (2020), [*Intellectual Property Issues for Faculty and Faculty Unions.*](#)
- ¹⁷ Kromrey, J., Barron, A., Hogarty, K., Hohlfeld, T., Loggie, K., Schullo, S., Gulitz, E., Venable, M., Bennouna, S., Sweetney, P. (2005), [*Intellectual Property and Online Courses: Policies at Major Research Universities.*](#) Paper presented at the National Educational Computing Conference, Philadelphia, PA.
- ¹⁸ Wessel, M. (2018), [*Key Current Intellectual Property Policy Elements: Avoiding Dogs that Bark in the Dark – Copyright.*](#) Paper presented at the National Association of College & University Attorneys, Minneapolis, MN.
- ¹⁹ University of Minnesota (2007), [*Board of Regents Policy, Copyright.*](#)

- ²⁰ University of Minnesota (last revised in 2021), [Administrative Policy: Copyright Ownership](#).
- ²¹ University of Minnesota, [Copyright Policy Background and FAQs website](#).
- ²² University of Colorado (last revised in 2003), [Regent Policy 5.K: Intellectual Property that is Educational Material](#).
- ²³ University of Colorado (last revised in 2013), [APS 1014: Intellectual Property that is Educational Materials](#).
- ²⁴ Colorado State University (last revised in 2000), [Board of Governors Policy on Intellectual Property--Copyrights and Patents](#).
- ²⁵ Colorado State University (last revised in 2000), [Section J. Rights and Responsibilities Related to Creative Works](#), Academic Faculty & Administrative Professional Manual.
- ²⁶ Arizona Board of Regents (last revised in 2018), [Policy 6-908: Intellectual Property Policy](#).
- ²⁷ Purdue University (last revised in 2017), [Intellectual Property \(I.A.1\)](#).
- ²⁸ Purdue University (2019), [Courseware and Online Modules \(S-19\)](#).
- ²⁹ Flaherty, Colleen (2019), [Purdue AAUP Objects to New IP Standard](#), Inside Higher Education.
- ³⁰ Flaherty, Colleen (2020), [IP Problems](#), Inside Higher Education.
- ³¹ University of Wisconsin System (last revised in 1997), [UW System Administrative Policy 191: Copyrightable Instructions Materials Ownership, Use and Control](#).
- ³² University of Texas (2018), [System Rule 90101: Intellectual Property](#).
- ³³ University of Texas Library, [Copyright Crash Course website](#).
- ³⁴ University of Michigan (last revised in 2011), [Policy 601.28: Who Holds Copyright at or in Affiliation with the University of Michigan](#).
- ³⁵ University of California (2021), [Copyright Ownership Policy](#).
- ³⁶ University of California (2021), [Copyright Ownership Policy FAQs](#).
- ³⁷ University of California (2003), [Policy on Ownership of Course Materials](#).
- ³⁸ University of California, [Copyright Website](#).
- ³⁹ Pennsylvania State University (last revised in 2019), [IP01 Ownership and Management of Intellectual Property](#).
- ⁴⁰ Pennsylvania State University (last revised in 2015), [IP03 Courseware](#).