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Mandatory Open Access Publishing for Electronic Theses and Dissertations: Ethics and Enthusiasm

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ABSTRACT

This article argues against policies that require students to submit theses and dissertations to electronic institutional repositories. The article counters a variety of arguments often used to justify this practice. In addition, the article reports on the results of an examination of electronic thesis and dissertation policies at more than 150 university libraries and graduate schools, offering a system of criteria and scoring for ranking these policies according to their respect for student copyright and intellectual property.

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In 2008, two authors of this article (Hawkins and Kimball) started hearing disturbing comments from several of our students who were completing dissertations: "I have to give up my copyright to the university or I can't graduate." At first, we couldn't believe such a thing—surely no university would hold students' degrees for ransom if they refused to forfeit their intellectual property rights.

But it turned out that our students were absolutely correct. Many universities today require students to submit their dissertations electronically before graduation. In our case, however, the Electronic Thesis and Dissertation (ETD) online submission process required students to sign away their rights to worldwide distribution to their work "irrevocably," "in perpetuity," and "in any medium" to the Texas Digital Library (TDL), an open access (OA) repository run by a consortium of Texas public universities. Students could not graduate without submitting their work to the TDL under these terms.

Only *after* agreeing to these terms were students allowed to request a two-year renewable embargo on releasing their research into the wilds of the Internet. (Evidently "irrevocable" means something

different to the TDL than it did to Daniel Webster.) But if they ever missed the renewal deadline, they could never embargo their work again. To top it all off, the TDL also failed repeatedly to honor the embargo specification, accidentally releasing at least nine embargoed dissertations online, contrary to the students' express wishes.

The questionable logic, ethics, and legality of this process eventually led—after four years of wrangling between faculty and students, on one side, and the Library and Graduate School and the TDL, on the other—to a new process allowing students to embargo perpetually the release of their work before signing anything else.³

This experience led us to look more broadly at university and library policies as they relate to student work. What we found in reviewing more than 150 graduate school and library websites was disturbing: in their enthusiasm for OA, universities and libraries across the U.S. are cajoling, arm-twisting, or even coercing students into in effect surrendering the copyright to their dissertations and theses, sometimes with the threat that students cannot graduate if they disagree.⁴

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¹ The authors are aware of a body of published discussion in library journals on the topic of institutional repositories. However, this article is not focused on scholarly debate, but on actual policies as currently implemented by research libraries. We provide our data set in the chart we included with this essay.

² The agreement form is access-restricted, but it has fortunately now been revised for our institution, under the review of the TTU assistant general counsel.

³ Now TTU students who choose to embargo their work perpetually sign only a license allowing the library to place their work in a dark archive; they do not sign the TDL copyright waiver.

⁴ We make this assessment after a careful review of the rhetorical structures involved in the policy statements of over 150 universities.

Our problem is not with the concept of OA or library publishing per se. In fact, we support positions such as those found in the "Denton Declaration: An Open Access Manifesto," where item 13 reads as follows:

The principles of open access should not be in conflict with the intellectual property rights of researchers (Keralis, 2012).

What we oppose is the unethical practice of forcing or manipulating students into giving up rights to their intellectual property. If researchers (students or faculty) of their free will and informed consent share their work in an OA institutional repository, fine. But given the unequal relationship of power between universities and students, universities ought to be particularly conservative about laying claim to the work that students do while under their supervision.

Instead, universities seem to be making a grab for students' research.

A BIASED RHETORIC

This grab typically takes the form of the coercion described above, or by propagandistic assurances to students that it's OK to give away their work. Across the board, universities engage in practices that push students toward OA in terms that experienced academics may recognize as manipulative, whether intended that way or not.

Take, for example, the Open Access Publishing page at the CUNY Graduate Center's Mina Rees Library (Thistlethwaite, 2012).⁵ The page, titled "Open Access & the Dissertation," is divided into three panes: on the left, "CUNY Embargo Policy & Options"; in the middle, "Concerns"; and on the right, "Surveys: ETDs do not discourage subsequent publication." Of the left-hand pane we have nothing but good things to say: all universities should be as open in declaring their policies. The middle pane, however, appears at first glance to acknowledge experts who have argued against OA ETDs, on the grounds that publishing a dissertation online disadvantages future publication opportunities. But the introduction at the top of the pane dismisses those voices: "Some academic publishers operate in traditional models only; others happily work with submissions from manuscripts published in ETDs or in OA contexts. Most evidence gathered in this argument is anecdotal" (Thistlethwaite, 2012). The page then provides links to articles against OA ETDs, introducing each with a short annotation ostensibly describing the article's content. However, those annotations don't accurately represent the content of the works: Leonard Cassuto's 2011 Chronicle of Higher Education article is called an "alarm," and students are directed to "read comments, too," suggesting (before students even click on the link) that Cassuto's views are misguided. In the same mode, the page claims that Kit Hume "misunderstands librarians [...] and warns" against OA ETDs; but the compound verb structure suggests that if Hume doesn't understand one (librarians), she can't possibly understand the other (library publishing models). And finally, Jennifer Howard's article (which quotes Hawkins) does not argue that "books and dissertations are ideally two separate things," as the CUNY page claims, but that series editors and academic book publishers are increasingly wary of reviewing and publishing books based on dissertations available via OA repositories.

This rhetoric essentially creates a straw-man argument setting old-fashioned "traditional models" against "happ[y]" library-publishers, and setting anecdotal complaints (like those of Cassuto, Hume, and Hawkins) against supposedly more reliable and empirical research (Thistlethwaite, 2012).

That research is presented in the right-hand pane, containing links and synopses of two supposedly more reliable studies. But on closer examination, one of these studies is deeply flawed, and the other is badly misrepresented.

The first is a dissertation that surveyed OA repository directors about how many students *reported* to the repository directors that their work had been rejected by publishers because it was based on work already published in repositories. But this kind of reporting is a highly suspect metric. Who knows how many former students *didn't* complain to the repository when their work was rejected by publishers? How many publishers rejected work for this reason, yet didn't say so to the author? Who knows whether the repository directors' numbers were accurate? And wouldn't the repository directors be biased toward open publishing models? This study simply replaces honest anecdotal evidence in the middle pane with anecdotes dressed up as empirical evidence.

The CUNY page summarizes the second study as saying that "96% of academic publishers welcome books and articles with a prior iteration as an ETD" (Thistlethwaite, 2012). But this link simply leads to an abstract, linked in turn to a Word document handout—ostensibly from a presentation, but with no information about the venue in which the presentation occurred. The handout includes data from a survey of publishers, but no methodological information about how the data was gathered, how many publishers were surveyed, or how they were chosen. Yet the CUNY page reframes even this vague summary to present ETDs in a falsely favorable light. Closer examination shows that the handout does not say that "96% of publishers welcome books and articles with a prior iteration as an ETD," as the CUNY page claims. Instead, it says that only 45% "Always welcome" such submissions, the remaining considering them only "Case by case" (27%), "If very different" (14%), "If access restricted" (3%), "Never" (4%), or "Other" (7%). Evidently the CUNY page takes the 4% of the "never" responses and subtracts it from 100% to achieve 96%—but this lumps together some very different responses.

After some searching, we found what we think are more details on this presentation, which seems to have occurred at the 14th International Symposium on ETDs in Cape Town, South Africa, 14 September 2011 (McMillan, Ramirez, Dalton, Reed, & Seamans, 2011). The speakers, Gail McMillan, Marisa Ramirez, Joan Dalton, Max Reed, and Nan Seamans, were representatives of the Networked Digital Library of Theses and Dissertations, which according to its website is "dedicated to promoting the adoption, creation, use, dissemination and preservation of electronic theses and dissertations" (Networked Digital Library of Theses & Dissertations, 2012). This information was not linked to the page CUNY linked to, or to the Word document linked to that page. Many readers would not know the stated mission or bias of the organization that sponsored the research unless they took the time and made the effort to investigate, as we did.

However, when we looked at the PowerPoint from this presentation we found even more troubling data. The PowerPoint gives more detail by separating its findings into responses by university presses versus academic journals. The university presses are remarkably less likely than academic journals to welcome works previously published in OA: of the former, only 10% answered "Always welcome," with 44% saying "Case-by-case" and 27% choosing "If different" (McMillan et al., 2011). This 10% of publishers welcoming works published in OA differs hugely from the 45% overall, and even more so from the 96% reported by CUNY.

⁵ Our analysis of the underlying rhetorical codes at work in this page should not be read as a criticism of Thistlethwaite. Her gathering of materials to help students understand the stakes involved in open access is commendable—and few librarians have made such an effort. As a result, we read the page as an example of how the best intentions can be thwarted by the widespread enthusiasm for open access institutional repositories built on ETDs.

⁶ Our analysis is based on the PowerPoint because at the time of writing (that is, when we accessed the CUNY website), this research was not publicly available in any other form. As we go to press, a prepublication version has been posted by *College and Research Libraries*, with an anticipated publication date of March 2013 (Ramirez, Dalton, McMillan, Read, & Seamans, 2012).

So while the implication of CUNY's phrase "96% of publishers welcome" is that almost all publishers will look favorably on submissions previously published as ETDs, the study CUNY referred to presents a much more mixed picture. And besides, a willingness of 45% of publishers (or 10%, or 96%) to review work based on OA ETDs doesn't translate to a comparable publication rate. Such an incomplete presentation of research would never satisfy any experienced academic. Yet it's held up by CUNY to graduate students as authoritative.⁷

The CUNY page clearly attempts to mitigate and minimize students' reasonable concerns about publishing ETDs online. This approach, whether intended or not, is more than a little patronizing, but it is in keeping with the tone in ETD policies across the country. Take as another example, the final article in the middle pane, a section ostensibly providing discussions opposing OA ETDs: Kevin Smith's blog post, "Dissertations for sale, or scaring the children" (Smith, 2012). Smith's post offers a telling example of a general disrespect towards students and their rights. Smith's position—that students are motivated by "fear ... not facts" and that universities who acknowledge their "demands" for equitable treatment are simply "cater[ing]" to their "anxieties"—is emblematic of the power dynamics that we find disturbing. According to this language, libraries are the adults; graduate students are whiny children; and institutions would be spoiling them by acknowledging their concerns about the prospects of publishing their work after it is distributed in an ETD OA repository.8

Other universities are engaging in similar rhetorical gambits, biasing documents on "formatting your thesis" with language that repeatedly undercuts legitimate desires for limiting access and lauds reasons for OA. In almost none of the 150+ institutional websites we reviewed is limiting access to one's work presented as a reasonable option. Open access consistently receives more sentences, more bullet points, more positive phrasing, and more clearly written sentences than does limiting access. At every step in the dissertation submission process, it appears that libraries and universities stack the deck in favor of OA.

ENTHUSIASM AND ETDS AS LOW-HANGING FRUIT

Why such a big rush toward OA ETDs, and why such heavy-handed techniques for pushing students to accept publishing their work in this way?

Advocates of library OA publishing frequently wax lyrical about sharing knowledge from silos of privilege to the entire world. In general we support that goal. But sadly, the high-minded rhetoric of OA proponents—rooted perhaps in the fear that the traditional library has become irrelevant in the face of digital information and unmediated

⁸ But graduate students are not children. According to a 2010 report by the U.S. Department of Education's National Center for Education Statistics at the Institute of Education Sciences, between 1995 and 2008, graduate students over 30 accounted for over half the population, and graduate students over 40 accounted for at least 20% of enrollments. See here the information about average graduate student ages extracted from Table 3, "Distribution of master's degree students, by selected student characteristics—1995–96, 1999–2000, 2003–04, and 2007–08" of the report (NCES 2011-219, 2011):

Student characteristics	1995-96	1999-2000	2003-04	2007-08
Age				
Younger than 25	16.6	15.6	18.5	19.7
25-29	33.4	34.0	32.3	30.8
30-34	17.9	17.6	16.5	16.6
35-39	10.9	11.2	11.0	12.2
40 or older	21.2	21.6	21.7	20.7

access—obscures selfish motivations that are just as powerful as philanthropic ones.

This dynamic could best be described as "enthusiasm," in the eighteenth-century sense. The OA bandwagon is in full swing. Everyone is talking about it. And everyone wants to get involved. Ambition, competition, reputations, and careers are on the line. We see this kind of enthusiasm in the Association of Research Libraries' handbook on how to convince your provost that an OA institutional repository is necessary:

[O]ur goal is to help you maximize the effectiveness of your message when you are ready to "sell" your provost's office on the value of the repository. Through our research, we've identified four key value propositions, or benefits, that have proven to resonate with provosts. To illustrate those benefits, we provide stories, screenshots and weblinks. A good anecdote is worth its proverbial weight in gold. Win your provost over with solid plans, great stories and compelling live examples. (Association of Research Libraries, 2009, 4).

Rather than empirical evidence and reasoned argument, the Association of Research Libraries suggests, just tell your provost a good story (how about "This one was owned by a little old lady who only drove it on Sundays," or something equally familiar to used-car salesmen?). The authors even conclude by giving advice on "Closing the deal" (Association of Research Libraries, 2009, 15). The entire document brings to mind high-pressure sales tactics more than the deliberations of an institution of higher education.

In addition, universities clearly wish to publish OA ETDs in order to polish their institutional reputations. One such case is described matter-of-factly by Michael Witt and Vijendra Singh Purohit at Purdue: "The Graduate School Admissions Office wanted to use the dissertations as advertisements of the quality and quantity of research being done by students" (Witt and Purohit, 2010). In other words, Purdue is publishing dissertations not only to share knowledge, but to sell Purdue.

These examples suggest that the enthusiasm for OA has created an imperative to fill the repository that takes precedence over the library's and university's core mission and values. The library's goal is no longer to serve and support the research needs of students and faculty, who are now neither patrons nor partners, but "content providers" whose intellectual property is treated as institutional work for hire.

Given these dynamics, it's not surprising that universities have settled on ETDs as easily harvested fodder for filling up online repositories quickly. Somewhat cynically, some proponents of OA library publishing even argue for pursuing ETDs because they represent what W. Aaron Collie and Nathan Dewitt have called "low hanging fruit" (2011): 10

At a typical university, doctoral candidates become accustomed to a regimented process for preparing and submitting their dissertations, defending them, and disseminating them on a common platform (e.g., ProQuest) with other dissertations. As a "captive audience", they may be more motivated and inclined to self-submit their data and descriptive metadata than other possible content producers (Collie & Witt, 2011, 165–75).

Putting "captive audience" in scare quotes does not disguise what this passage suggests: that students are easy to push into participation in an OA institutional repository. As a "captive audience"—and we wish to emphasize "captive," with the overtones of restriction and oppression that the term implies—students' free choice is limited by the

McMillan's findings were recently presented in the Chronicle of Higher Education (Howard, 2012). McMillan's representation of faculty attitudes in the Chronicle article is similar to the rhetoric of the CUNY web page (and of the blog post by Kevin Smith, which we discuss later on): faculty and students "play it safe," making decisions that are "driven by anecdotes" or "fears" instead of "data." No faculty were interviewed for the Chronicle article.

⁹ According to the Oxford English Dictionary, in the 18th century enthusiasm carried connotations of "ill-regulated or misdirected religious emotion, extravagance of religious speculation"; the OED quotes Samuel Johnson who deems it a "vain confidence of divine favour or communication."

Another use of this metaphor comes from MIT, which also compares electronic theses to low-hanging fruit and extends the metaphor by saying they needed "ripening" with metadata (Glavash, Stone, & Comstock, 2006).

power structure in which they live. They may appear independent, but they are inclined to comply with ETD requirements because they are not only used to complying with the power that universities hold over them, but may feel compelled to do so. Students are likely to do what they're told, regardless of whether it's in their best interest.

The power dynamic differs for faculty who may or may not choose to publish in the OA model. The fact is that in most OA institutional repositories, faculty-authored content is scarce, largely because most faculty members prefer to publish in peer-reviewed venues, including peer-reviewed OA journals. Faculty have the right to have their material never appear in the institutional archive (the equivalent of a permanent embargo for students) or to put their research in after publication (an option students are not given) or to arrange some combination of OA and traditional publication that suits their needs. For faculty, this constitutes a do-it-yourself embargo system. Why not allow students to participate on these same terms?

The lack of participation by many faculty members, however, puts managers of institutional repositories in a tight spot. Libraries and universities have spent millions of dollars setting up repositories and paying for staff to run them. But if the repositories don't have much content, or much high-quality content, those investments are pretty pointless.

This lack leads to the temptation to lay claim to ETDs as "low-hanging fruit" with which to pad otherwise barren institutional repositories. It's easy to require students to submit their ETDs as a graduation requirement, or to convince students to do so by using some of the techniques we saw on the CUNY page. It's certainly easier than getting grumpy, stuck-in-the-mud faculty to give away their work.

It's not impossible to change this dynamic, but getting faculty to say "yes" to an institutional repository requires more than salesmanship. Faculty will not participate until—and unless—they are able to have input into the shape, form, and policies of institutional repositories. In the meantime, non-participation in institutional repositories does not always signal that faculty are opposed to OA, simply that faculty choose the best form of OA to suit their needs. Faculty know they have the choice to contribute their work to disciplinary repositories, which offer higher visibility within their research fields and the opportunity for peer review that is more likely to be recognized by promotion and tenure processes. (See, for example, the Bibliographical Society of America's repository, BIBSITE, or the peer-reviewed consortium of nineteenthcentury scholarship NINES.) In other words, the institutional repository isn't always the best way to meet the goals of OA for scholarly communication. The way for libraries to retain relevance with their faculty is to collaborate with them in these efforts, instead of holding forth the institutional archive as the be-all-and-end-all of OA. The role of the library in our view-is to include faculty and students in the formation of the archive, rather than to alienate faculty by coercing their advisees to give up their intellectual property.

MYTHS OF OPEN ACCESS ETDS

Before we go on to describe what remedies we think universities and libraries should implement to resolve this ethical dilemma, we'd like to discuss a few of the illogical conflations, contradictions, and misleading distinctions that seem to influence the movement toward OA ETDs as it is presented in the policy documents and other library-produced materials we have reviewed.

"A DISSERTATION IS NOT A BOOK"

On its face, this is no doubt true. Almost all dissertations need significant revision and even re-thinking before they can be submitted to a publisher. This distinction also implies that a dissertation has less value than a book—so you might as well publish it online.

However, this distinction doesn't necessarily make a dissertation free from value, much less justify its appropriation and worldwide publication. Sure, some dissertations won't contain such groundbreaking

content that the availability of a prototype would discourage future publication. But some dissertations contain unique data or content that, if already published online, might discourage a publisher from republishing it. Some students, for example, often do original archival scholarship, bringing to light previously unknown documents. In these cases, students will be irreparably harmed by having their work available, even in prototype. Further, some students write creative theses or dissertations: novels, plays, poems, and so on. Such a dissertation doesn't just *contain* valuable data or content; it is valuable *in itself* as an artistic expression.

Certainly it's easy to point to cases where institutional repository publication did not harm book sales, or even may have led to later publication. But the point should be this: students need to be able to preserve or publish their work as they see fit, determining whether publication online may or may not be beneficial to their work and career.

Besides, it's impossible for a library or OA repository to assess the potential value of a dissertation. Librarians and archivists simply do not have the expertise to determine whether or in what ways a dissertation may be valuable, any more than we as English professors have the expertise to determine the potential value of a physics dissertation. Sometimes the value of a dissertation takes even experts by surprise; it's that unpredictable.

Moreover, no two dissertations are alike; therefore, presenting students with a limited range of fixed embargo options signals a lack of understanding of the complexity and diversity of their research. For this reason, a one-size-fits-all approach is inappropriate.

The dissertation/book distinction is also based upon a false dichotomy that elides all of the other things that a dissertation can lead to. Some dissertation research eventually takes the form of a patent, which could be highly valuable. What if we are asking students to give up not just publishing, but patent opportunities? Some students turn their dissertation research into a business; should we be requiring them to publish their innovations online?

And sometimes dissertation research cannot be published by any means. If the student is working under a supervisor working on a major grant, publishing the student's work as an OA ETD could harm the supervisor's ability to apply for further funding. If the research were funded by a private corporation or a government agency like the Department of Defense, students may not even own the rights we're asking them to give away. On what ethical grounds can we require students to break prior agreements in the name of OA?

Most importantly, this distinction, and the entire debate into the effects of OA ETDs on prospects of future publication, obscures the central ethical issue: *students own their work, and universities shouldn't try to wrestle it away from them.*

"APPROVAL BY A DISSERTATION COMMITTEE IS PEER REVIEW"

At the same time that supporters of OA ETDs stress that a dissertation is not a book, they sometimes claim that dissertations are peer reviewed, based on the approval of a dissertation committee. Wanting to have their cake and eat it too, they bolster the authority of ETDs by conflating dissertation review with peer review. Perhaps this position comes from Proquest/UMI, which states in their advertising materials, "All dissertations and theses are peer-reviewed" (Proquest, 2012). Even if institutions don't support this idea, when they simply link to Proquest's UMI site, they are implying agreement.

Of course, there are significant differences. Most scholarly peer review is blind, or ideally double blind, whereas dissertation committees always know whose work they're reading. Dissertation committees assess whether a student's work has fulfilled program outcomes and requirements, not whether it's ready for publication or even widespread release. Dissertation review certifies the student's capabilities within the context of the discipline and the institution.

Attempts to make approval by a dissertation committee stand in for peer review also imply that publication in itself authorizes the validity of research. In literal terms, publication simply makes something public. But there's publication, and then there's publication. Publication without peer review is considerably less valuable than publication with peer review. We recognize that one argument in favor of OA ETDs is to make research data available for replication studies, and we approve of that goal. However, OA ETD publication in institutional repositories has the disadvantage of suggesting that research is more authoritative than it may in fact be.

"SUBMITTING AN ETD TO AN OPEN ACCESS REPOSITORY IS JUST LIKE ANY OTHER DEGREE REQUIREMENT"

One of the most troubling arguments is the claim that students must allow their work to be submitted to an OA repository as a condition of graduation. Of course, students must submit a dissertation to the university to earn a degree; that's only reasonable. But how that dissertation is subsequently stored or published is (or should be) an entirely separate issue.¹¹

By submitting a faculty-approved dissertation to the university, students are providing evidence that they have fulfilled the requirements of a degree. What the university does subsequently with that evidence has no effect on whether the student has actually completed the degree requirements.

Requiring students to publish their dissertations in an OA repository differs from other graduation requirements, such as requiring students to turn in their library books and keys or settle their bursar's accounts. In those cases, the student has retained something to which the university has a claim. But in the case of a dissertation, the university is laying claim to something that the student owns. We might as well tell students that they have to give the university their car or bicycle before they can walk the stage at commencement.

"PUBLISHING AN ETD ONLINE IS NO DIFFERENT FROM PUTTING A PAPER DISSERTATION ON A LIBRARY SHELF"

This common argument suggests that concerns about unauthorized reproduction of ETDs is silly because a paper copy in a library also can be copied and republished. But this argument is spurious: if a single copy available in print to a single user at a particular time in a particular place is the same as an electronic copy made available to everyone with Internet access in the entire world, then why bother publishing dissertations online at all?

In fact, the same people who make this argument are also often cheerleaders for the transformative nature of the Internet, which allows anyone in the world to access information anywhere. They rightly point out that this change in the scale of access changes everything. Certainly, it radically alters the fate of students' work. The reader of a print copy of a dissertation would have to access the document either in the home institution's library, or as part of a legitimate interlibrary loan network. If he wished to copy the work, he would have transcribed it by hand or at a photocopier or scanner, making it less likely that he would make a full copy (especially considering most libraries' policies about using photocopiers while respecting copyright). Even if he did make a full copy, it's less likely that he would distribute that copy widely—it's just not convenient or cost-effective, and the restricted access makes it

unlikely that the people who go to the trouble of reading the dissertation would abuse their privileges.

But making an ETD available to the entire world purposefully removes these reasonable obstacles. It opens the student's work to rapid, low-cost, automatic copying and redistribution, irrespective of the rights of the author. Open access allows abuse by allowing illegitimate parties across the world to look for things that they can steal and sell for a quick and easy profit. ¹² In the worst cases—those where institutions have set up no system for moderating who can access the materials (such as registration and verification of users)—OA repositories foster misuse.

Open access supporters know this, and often condone it, using the argument that "information wants to be free." But there's a difference between deciding to offer your own work to the world and requiring your students to do so.

One could even argue that institutional repositories create a gold OA system. Students pay tuition and fees, which—when institutional repositories appropriate student work and distribute it—becomes a sort of pay-for-publishing model that many decry in the predatory OA journal market. Certainly, UMI's fee for OA (\$95)—which some institutions require—is just that. The only difference is that institutional repositories are not allowing students to choose how, or even whether, they wish to participate.

"THESES AND DISSERTATIONS ARE PART OF THE RESEARCH OUTPUT OF THE UNIVERSITY"

Charles Lowry comments that "What must be achieved is a balancing act that honors two important academic traditions—the copyrights of authors and the research mission of broad access to the scholarly research output of the university" (Lowry, 2006). ¹⁴ In general, we agree with the need for balance, as well as with the mission of sharing knowledge widely. But by lumping student and faculty work into the "research output of the university," Lowry overlooks the very different legal situation of these two groups. Faculty members are paid to do research; students pay to earn degrees.

Universities can make a variety of claims to the work produced by faculty. That's okay, because faculty members are employed in part to produce scholarship. According to copyright and workplace law experts we have consulted, by federal law without prior agreement, employers can lay claim only to whatever work they have hired someone to do. In other words, if we hire a plumber to install a sink, we can keep the sink, but we can't claim the boat he's building in his garage.

¹¹ Several of the institutions we surveyed have now created a technological skill requirement that submitting the ETD fulfills. Take the policy at Kent State for example:

By preparing an ETD and submitting it electronically you learn about electronic document preparation and about digital libraries. These skills will serve you well whether you teach, do research, or use the research results of others. For instance, in many cases it's now required that grant proposals be submitted as PDF files. (Kent State University Libraries, 2012).

Certainly, creating a PDF is a useful skill, but is submitting an ETD to an open access repository the only way to show one's technological savvy?

¹² Jeffrey Beall in an interview with the *Chronicle* on predatory uses of open access offers important criticism of open access publishing in general: "Predatory open-access publishers are those that unprofessionally exploit the gold open-access model for their own profit. That is to say, they operate as scholarly vanity presses and publish articles in exchange for the author fee" (Elliott, 2012). Beall's article "Predatory Publishing: Overzealous open-access advocates are creating an exploitative environment, threatening the credibility of scholarly publishing" offers the following conclusions: "Librarians and open-access advocates have also spent much time and effort denouncing—even cyberbullying—traditional scholarly publishers. [...] Some even insist on open-access mandates, rules that would require researchers to publish all their work in open-access venues, thereby depriving them of the freedom to publish in the venue of their choosing and serving to further energize the exploitative open-access publishers" (Beall, 2012).

¹³ Take for example the participation of Texas A&M University, Texas Tech University, the University of Houston, and the University of Texas at Austin in the Texas Digital Library. Each of these institutions is a "Tier I" member, a category which allows each member organization, among other things, a "permanent" seat on the TDL governing board. That status costs participating institutions \$100,000 a year (Texas Digital Library, 2009a, 2009b). If university libraries are funded wholly or in part by student fees, as they are increasingly, then, the price tag for participating in digital initiatives comes out of student pockets.

¹⁴ Though we criticize this point in Lowry's article, his is—of all we have reviewed—the most thoughtful in his willingness to consider faculty and disciplinary constraints. We agree most with his assertion that "In the end, the real reason for tackling the disciplinary differences that repository posting or archiving entail is that it is the right thing to do" (Lowry, 2006, 393). Though his article appeared in 2006, few libraries appear to have taken any part of his discussion to heart.

Unlike faculty, however, students are not employees, and they weren't hired to write theses or dissertations. So under this legal standard, universities or states cannot claim the work that students have done as part of their education, regardless of the support they may receive in scholarships, fellowships, tuition remissions, or grants: none of that is work for hire.

Students' work therefore can't be lumped into the "research output of the university."

"A ONE- OR TWO-YEAR EMBARGO IS PLENTY OF TIME TO PUBLISH A DISSERTATION OR GET A PATENT"

Although librarians, especially those with faculty status, may write books themselves, they inexplicably still insist on embargo periods that show little real sense of the time that it takes to bring a work to publication.

Many schools—43 of the 152 we looked at, or 28.48%—either don't allow an embargo at all, or don't tell students about it anywhere they can find that information readily. Of those schools that do allow an embargo, the average maximum embargo allowed is 2.18 years, with a pretty low standard deviation of 1.1. This tight clustering around 2 years suggests a high degree of consensus that students don't deserve more than 2 or so years in which to have full control over their work until it is openly published in an institutional archive. The picture is even more bleak if we count the schools with no discoverable policies as having a maximum embargo of 0. In that case, the average maximum embargo drops to 1.54 years. Only 5 schools allow a permanent embargo.

Another way of looking at this data is that rather than establishing embargo limits that suit the needs and ambitions of local students, many institutions seem to have adopted the standard embargo limits provided by UMI—6 months, 1 year, or 2 years. ¹⁵ But these times are not feasible for those students who wish to publish their work for academic or other professional purposes.

Just because libraries have settled into some general agreement about what *libraries believe* is an appropriate amount of time for embargoes, this should not be read as a consensus informed by the actual time that it takes to publish a book or get a patent. The current embargo times show little awareness of the realities of the publishing market for those students who wish to publish their work or who intend to pursue academic careers where their dissertation is their best seedbed for early-career publication.

It's true that in the sciences, it is possible to submit an article based on a dissertation and see it published in under a year—sometimes even in six months. But it can take years for a humanities project to see the light of day. Moreover, humanities students who are lucky enough to find jobs in the academy desperately need their dissertations to fuel their scholarly work till tenure. Without the head-start a good dissertation provides, it's incredibly difficult for a young faculty member to produce enough scholarship in five or six years to merit tenure—especially when that new faculty member also carries a high teaching load.

According to data aggregated from the Carnegie Foundation for the Advancement of Teaching website, around 94.6% of post-secondary institutions require a 4/4 course load (24 credit hours a year) or higher (Carnegie Foundation for the Advancement of Teaching, 2012). That means that the vast majority of students who find academic jobs need significant extra time to turn their work into a book or even into articles. Even after publication, it takes some time for a work to reach its full

audience, a process that would be undercut if the work were available freely online.

Let's say that a student is lucky and skilled enough to write a dissertation with good publishing potential as a scholarly book with a university press. Here's a relatively speedy timeline for that work to move through the review and publication process:

- 1–2 years for revision, usually while the former student learns a new job, taking on new course preparations and service responsibilities.
- 6 months for peer review.
- 6 months for revisions.
- 12 months for permissions review, copyediting, typesetting, printing, mailing to purchasers.
- 2 years for reviews to begin to appear in scholarly journals.
- 2–3 years for publishers to recoup their investment in a book and for authors to gain whatever royalties their book might generate.

In sum, authors and publishers will need a minimum of 4–5 years before the dissertation is released to the general public via OA. Most IR policies don't even allow the author the time it takes for initial peer review.

Librarians, and others, may be moan the slowness of this process as a point in favor of OA systems, but those systems don't provide the gold standard for career advancement—the blind peer-reviewed book

The timeline might be different for students in the sciences who wish to publish articles, but if they want to apply for a patent, their situation is only little better than the humanists and their books—and perhaps even much worse. According to the United States Patent office website, it currently takes 22 months on average from the filing of a patent to receive an initial response from the patent office, and—if all goes well—the average time to approval is 32.4 months. ¹⁶ If, however, a patent involves any appeals, the average time increases to 85.9 months (that's over 7 years *on average*) (United States Patent & Office, 2012). ¹⁷

Therefore, anyone who was actually concerned with giving students adequate time to publish or patent their work can easily see that 2 years simply isn't sufficient.

AN ETHICAL APPROACH TO ETDS

Given the ethical faults of the current approaches to archiving ETDs, the authors of this article would like to propose an alternative approach that more closely aligns with ethical treatment of students and their work. This approach is based on two values: respect for a student's intellectual property and institutional transparency.

RESPECT FOR STUDENTS' INTELLECTUAL PROPERTY

Universities and their libraries should respect intellectual property, particularly when the author is in a position of relative powerlessness. A dissertation belongs to the student who created it, not to the institution that sponsored the student's education. Students have a right to determine, without coercion or manipulation, how their work will be distributed and accessed. Institutions that claim or imply that a degree is dependent on submitting a thesis or dissertation to an OA repository are coercing students. Universities that target student work as "low-hanging fruit" are manipulating students for purposes unrelated to the students' educational or professional best interests.

¹⁵ In a conversation with a UMI representative, Hawkins learned that students can gain an unlimited embargo, simply by contacting UMI to request it. This is even possible if the degree-granting institution has required open access. Students should be told that other lengths of embargo time are available from UMI if UMI is the designated repository.

¹⁶ Though the patent office has instituted a fast-track patent process that provides a response in 12 months, that track is available only to original utility and plant patents—not the sort of patents that students would be applying for.

¹⁷ The USPO indicates that they intend to reduce first action pendency to 10 months and traditional total pendency to 20 months by 2015, but even with those reduced—but not yet actual times—students would be unable to complete the patent process before their work is made available through the institutional repository.

Because students own their own work, they should enjoy the right to embargo its publication from any OA repository for as long as they want. There should be no approval process, no extra forms, no phone calls to UMI every six months to remind them that one's work is supposed to be on embargo (as is the case with one of the students we know).

It's their work. If they want it to be freely available online, fine. But if they don't, institutions should respect their choice.

INSTITUTIONAL TRANSPARENCY

Given their enthusiasm for OA to other people's work, you'd think universities and libraries would not be reluctant to make their own policies readily visible. But in fact, there's a remarkable lack of transparency about ETD and embargo policies. Ironically, "open access" seems to apply only to student and faculty work, and not to institutional policies.

One wonders if this is in part because such policies have often been developed, and are frequently upheld and implemented, without meaningful consultation with faculty and graduate student stakeholders.

Institutions should make their ETD policies and information about ETDs available prominently and conveniently on their web sites and in their practices. Moreover, institutions should explain the contentious issues surrounding ETDs and OA access publishing in terms that do not advocate either for OA or for traditional publishing models. All policies, descriptions, and instructions should fairly represent all sides.

RECOMMENDATIONS

Given these values, universities and libraries should protect students' rights by providing a clear communication of policies and full support for students' intellectual property.

RECOMMENDATION 1: PROVIDE ETD POLICIES ON A PROMINENTLY PLACED, UNBIASED WEBSITE

Such a website should contain at least this information:

- Clear, unbiased definitions of at least the following terms: copyright, copyright holder, license, OA, embargo.
- A clear description of situations in which students cannot make their work OA, usually because they are not the sole copyright owner. These situations might include the following:
- If a student has published work out of the dissertation or the entire dissertation itself already
- If a student has worked on a part of a larger project that belongs to a dissertation director or some other faculty member
- If a student has worked on a project funded in part by a grant and the granting organization requires non-disclosure
- A clear description of the situations in which a student might need or want to choose to embargo his or her work permanently. (Institutions already, for the most part, include a description of why OA can be a good choice.)
- An acknowledgement that making work freely available via OA might limit publication potential (Hume, 2012). If the library can't manage this on their own, they should provide a list of articles that express the problems.
- An unbiased description of the pros and cons of embargoing work for a period of time or permanently. Limiting or denying access should be presented as a respected right of the copyright holder.

RECOMMENDATION 2: PERMANENT EMBARGO BY DEFAULT (OPT-IN)

As we explain above, existing embargo limits typically ignore the realities of publishing for those copyright holders who wish to pursue traditional publishing routes. ETDs should be permanently embargoed by default, and students should not need anyone's permission to embargo their work.

In other words, institutional repositories should be set up to require that authors opt in to OA, rather than fight to opt out.

RECOMMENDATION 3: AUTHENTICATE USERS OF ETDS AND INFORM THEM OF THE INTELLECTUAL PROPERTY RIGHTS OF AUTHORS

To avoid inappropriate use and copyright violations, users of the archive should be required to register for the site, providing a name, institutional affiliation, and contact information. (This information could be kept isolated to respect patron privacy.) The registration process should include mechanisms to disallow automatic downloading programs that unscrupulous visitors might use to copy and reproduce entire dissertations and archives.

Moreover, the archive site should include an end-user license agreement (EULA) explaining that the material is copyrighted and cannot be republished without the author's express permission.

RECOMMENDATION 4: PROVIDE A MEANS FOR AUTHORS TO PROFIT FROM THEIR OWN WORK

The dissertation writer should have the right to profit from their work, if they so wish; as a result, libraries will need to capture payment information for dissertations for which the copyright holder wishes to be paid a royalty.

RECOMMENDATION 5: PROVIDE INFORMATION TO AUTHORS ABOUT USAGE

Libraries should make available to the copyright holder, upon request, the number of times that a dissertation has been viewed and the number of times that it has been downloaded. (And some do.) They might need in certain situations, such as piracy, also to reveal the names of those who have downloaded the work. This might seem objectionable to libraries that claim the necessity to protect user privacy. But if libraries intend to become publishers, then they must accept the other responsibilities that publishers fulfill, not just that of distribution.

RECOMMENDATION 6: BEGIN OPEN CONVERSATIONS WITH ALL STAKEHOLDERS IN THE ETD PROCESS, INCLUDING STUDENTS AND FACULTY

To date, the only impacts examined have been from the library side. The library represents to the graduate school how documents ought to be managed, and other institutional bodies have, to this point, assumed that the library is an impartial body. But the library isn't impartial. These archives are being built to serve the best interests of the library, and to raise the library's profile and status among other libraries. And one should judge a library on the number of faculty who willingly deposit their works in the archive, not on how many students are coerced to provide their work (Cybermetrics Lab., 2012). ¹⁸

ETD policies must respect the needs of all stakeholders, not just those of the institutional repository. What about the other constituents—faculty, students, enrollment managers, university counsel?

Libraries that insist upon coercive OA policies risk doing permanent damage to their relationships with the people who should matter the most: the faculty and students who trust the library to support their research needs. We would like to live in a world where faculty members, along with our students, can work collaboratively with libraries to create OA policies that serve everyone's needs. Unfortunately, given the current situation, we must point to several ways in which students and faculty may—in some cases, must and should—respond to unethical IR policies, regardless of the negative impact those responses will have

¹⁸ The methodology of the Webometric Ranking Web of Repositories puts size as the first criterion beyond having an autonomous domain name, suggesting that the sheer number of files is the primary factor in bragging rights.

on the recruiting and retention of students, and the overall reputation of the libraries and institutions. If libraries refuse to protect the rights of our students, we must advise our students, and our colleagues, to do so by whatever means they find necessary.

To this end, we recommend that students and faculty take the following steps:

- Prospective students should as part of their application process examine each institution's policies with regard to dissertation archiving. Students should refuse to apply to or matriculate at institutions that require them to sign away their work. To aid students in this evaluation, we provide charts—and scores—for PhD-granting institutions in the Humanities.¹⁹
- Students who have already matriculated should advocate—with the
 aid of the university ombuds—for more appropriate policies. If their
 appeals go unanswered, they should move to another institution
 with more enlightened policies. If moving isn't reasonable, then students should find a pro bono attorney and file a class action suit
 against the university to force the library to play fair with their copyrights (Hume, 2012).
- While we object to the idea that graduate level research should be shaped to fit within arbitrary and ill-considered OA policies, we also acknowledge that some projects are more readily adaptable to OA than others. For this reason, it is crucial for faculty to discuss the impact of OA early enough in the dissertation writing process to determine whether, and how, a student's research interests and content are suitable for OA, so that those who can benefit from OA will be well-positioned to do so, and those who will not benefit can take measures to protect their research, including removing research findings that they do not want to share. If libraries mandate OA without providing reasonable embargo options, it will be in the best interest of some students to defend one version of the dissertation and turn in another. We realize that in the worst case scenario, such actions constitute the academic equivalent of a scorched earth policy: the repositories will be full, but the "low hanging fruit" will not be particularly appetizing. But what choice do we have? If our students, whose livelihoods may well depend on their ability to publish their work, are not going to be allowed to choose how, and when, to make their research public, why should they continue to allow others to benefit at their expense?

INSTITUTIONAL POLICY RANKINGS

To evaluate the fairness of an institution's policy, students and faculty can use the chart at the end of this article (compiled by E. Leigh Bonds). The 150 institutions in the chart are drawn from the National Research Council (NRC) rankings of institutions which offer doctoral training in the Humanities. The NRC report considered PhD programs in 14 fields: American Studies; Classics; Comparative Literature; English Language and Literature; French and Francophone Language and Literature; German Language and Literature; History; History of Art, Architecture, and Archaeology; Languages, Societies and Culture; Music (except performance); Philosophy; Religion; Spanish and Portuguese Language and Literature; and Theater and Performance Studies (O'Leary, Caldwell, & Glenn, 2011). We cross-referenced the NRC programs with American Association of Universities (AAU) institutions that offered degrees in the humanities and accordingly added two Canadian institutions, the University of Toronto and McGill University (Association of American Universities, 2012).

The chart provides information publically available on university websites. In compiling this information, we determined that visible and clear policies were essential both for prospective and current students. Many institutions provide policies that are difficult to find: sometimes six clicks from the main website page (or four clicks once you get to the Graduate School site), sometimes in multiple locations which require compilation on the part of the reader. Why isn't thesis and dissertation submission information a direct link from the graduate school main page?

In searching sites for policies, we observed roughly a 15-minute rule: if the policies on embargoes or copyright were so hidden from view that we—as experienced academics—could not find them in that time, we assumed that students would not be able to find them without help. As a result, points were only assessed if the information was readily available on the websites consulted (i.e., did not require complicated searching).²⁰

As the chart reveals, university policies are often not fully explained, and essential categories of information (such as whether a student can renew an embargo and the process by which one would go about doing so) are simply not addressed.

Copyright information as provided to students is also problematic. Consider SUNY Binghamton, for example, which tells students that if they don't include the copyright symbol, their work becomes "part of the public domain as soon as it is accepted by the Graduate School and delivered to the UMI/Proquest." By any informed reading of copyright law, this advice is simply wrong.

Institutions should not read the high percentage of low scores as justification to do nothing to make their policies more ethical. Instead, a high percentage of the institutions reviewed should be embarrassed to provide so little useful information to their students. The low scores only underscore our impression that most institutional repositories are not interested in gaining the informed consent of their students.

We will maintain this chart at Hawkins and Kimball's website: http: writingstore.com/ETDscores. If universities revise their policies to provide more ethical treatment of students, we will be happy to consider revisiting their scores, given appropriate documentation.

Given our recommendations above, we ranked the schools on the following point values:

1. Rhetorical clarity: 30 points

Because the policies vary dramatically in their clarity and fairness, in this section we simply assume a scale from 1 to 10, with the 1 identifying unclear, biased, or coercive (or misleading) statements and the 10, identifying clear and fair statements.

- a. Nature of open access and restricted access (up to 10 points) In assessing pages, we use the following values:
 - Situations for OA and embargoing discussed in equally neutral
 - Contexts in which students might need to embargo their work offered fairly and objectively and without a privileging of OA (i.e., more space is not devoted to OA than to embargoing)
- b. Explanation of copyright (up to 10 points)

In assessing pages, we use the following values:

- Students must be acknowledged as the copyright holder of the work.
- Unbiased definitions of terms (copyright, copyright holder, license, etc.) in clear plain and *accurate* language
- Students must be told how to copyright on their own and notified of the fee the US Copyright Office charges. In best cases, students will also be provided with a link to the US Copyright Office, but a link by itself does not constitute good representation of the issues.

¹⁹ Our chart will be hosted not just at this journal, but at our own website. As graduate school and library policies change to value student copyright, we will reevaluate the scores we have provided and adjust them when warranted.

²⁰ In calculating the point values, we duplicated the process we used in gathering the information originally. Two of us independently revisited each website and searched an additional time for policies. We again attempted to limit our time to 15 minutes of searching, but in the end this allowed each institution around 30 minutes by two different researchers. We scored institutions independently, compared scores, and revaluated any score with a greater than 5 point discrepancy.

- If the institution has contracted with UMI, students must be told that the fee UMI charges for copyright differs from the fee charged by the US Copyright Office itself.
- Institutions should ensure that information about copyright is accurate and fair, rather than abrogate such discussion to UMI (which advocates for open access and charges more for it)
- c. Consistency with other university policies concerning intellectual property (10 points)
 - ETD policy placed in the context of university operating policies in regard to faculty, staff, and student intellectual property rights
 - Note: in the column asking 'does University policy give students rights to their intellectual property,' N/A indicates only that the graduate school or library policies on ETDs did not refer to university operating policies. N/A does not indicate that those OPs do or do not give students intellectual rights.
- 2. Respect for student intellectual property (up to 50 points)
 - Unlimited embargos freely available to all who ask: 50 pts
 When a freely available unlimited embargo is not available, the following points are assessed:
 - Unlimited embargoes with approval process: 30 points
 - Limited embargoes under 1 year: no points
 - Limited embargoes of 2 years: 5 points
 - Limited embargoes of 5 years: 15 points
 - Limited embargo requires approval: -5 points
 - Renewal policy and procedure clearly stated: 5 points
 - · Ability to renew at any time: 10 points
 - Ability to change to unlimited embargo, if not previously chosen:
 10 points
 - Extensions of embargo period not allowed: -5 points
- 3. Accessibility of policy (up to 20 points)
 - Policy is accessible from both graduate school and library websites: 10 pts
 - Policy is available from the *main* page of the graduate school and *main* library website: 10 pts
 - Policy is accessible from one or other website: 5 pts
 - Policy simply links students to UMI site: -5pts
 - Policy only available via PDF download or via podcast or some other mechanism: -5 pts
 - Policy requires searching: -5 pts
 - No policy provided: 10 pts
 - Policy appears in multiple locations, but is contradictory: -5
 - Permission required to apply for copyright: -5

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Ranking of Institutional Policies

	Score (out of 100)	Carnegie designation	Embargo policy site	Allows unlimited embargo	Embargo requires extra approval	Allows limited embargo	What is embargo period?	Max embargo	Can one renew? and by what process?
American U	66	DRU	http://www.american.edu/ provost/grad/etd/guide.cfm#five	Yes	No	Yes	6 months, 1 year, 2 year but may be longer or permanent	2+	No, period must be determined at time of embargo
Arizona State U.	8	RU/VH	http://graduate.asu.edu/format/ special_considerations/ copyrights-permissions	No	By committee at defense	Yes	2 years	2	Not discussed
Auburn U.	22	RU/H	http://www.grad.auburn.edu/ etd_guide.html	No	No	Yes	5 years, acknowledges that UMI form indicates only 2 years	5	Not discussed
Baylor U.	30	RU/H	http://www.baylor.edu/content/ services/document.php/46753.pdf	No	No	Yes	2 years or 5 years		Can be extended via email to library before end of embargo period
Binghamton U (SUNY)	-10	RU/H	http://www2.binghamton.edu/ grad-school/manual/ thesis-dissertation.html#343	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
Boston College	11	RU/H	http://libguides.bc.edu/content. php?pid=47385&sid=388778	Not discussed	Not discussed	Yes	Usually 6 months, 1 year, 2 years	2	Not discussed
Boston U.	20	RU/VH	http://www.bu.edu/library/guide/ theses/	No	Depends on school and individual case	Yes	Up to five years	5	Yes, up to another 5 years
Bowling Green State	11	RU/H	http://www.bgsu.edu/gradcoll/etd/page25392.html	No	No	No	6 months, 1 year, 2 years, other (up to 5)	5	Not discussed
Brandeis U.	14	RU/VH	http://www.brandeis.edu/gsas/ completing/dissertation- guide.html	No	No	Yes – for traditional publishing option	6 months, 1 year, 2 years; may manually increase length beyond 2 years	2+	Can be extended; neither length nor process clear.
Brown U.	20	RU/VH	http://library.brown.edu/etd/index.php	No	Yes	Yes	After 2 years becomes open access	2	Yes, can renew for 2 year periods, up to 10 years
Bryn Mawr College	10	CompDoc	http://www.brynmawr.edu/gsas/ documents/ThingstoKnow aboutProquestUMIandyour Dissertation.pdf	No	No	Yes	6 months, 1 year, 2 years; strongly recommends 2 years	2	Yes for 1 year, only if publishing contract in hand
Carnegie Mellon U.	10	RU/VH	https://libwebspace.library.cmu. edu:4430/libraries-and-collections/ Services/Dissertation/current_umi_ agreement.pdf	No	Not discussed	Yes	6 months, 1 year, 2 years; embargo only mentioned on form	2	Not discussed
Case Western Reserve U.	5	RU/VH	http://www.case.edu/artsci/anth/documents/ ETDDocumentApprovalForm.pdf	No	Unknown. Petition form not found	Yes	Up to two years	2	Not discussed
Catholic U. of America	5	RU/H	http://libraries.cua.edu/dscua/ etdcua.cfm	No	No	Yes	6 months, 1 year, 2 years	2	Not discussed
City U. of New York Graduate Center	5	RU/H	http://libguides.gc.cuny.edu/ content.php?pid=231531&sid= 2445156	No	No	Yes	Up to 2 years	2	Not discussed
Claremont Graduate U.	0	RU/H	http://www.cgu.edu/pages/ 9561.asp	Not discussed	No	Yes	Only mentions embargos, never explains	0	Not discussed

Explains terms and issues surrounding open access	Explains implications of open access	Policy visible to prospective students	UMI publishing agreement	Library policy	Copyright Info provided, even if minimal	Link to university operating policy concerning intellectual property	Does OP give students rights to their intellectual property
Yes	Yes	If searched: on the dissertation/thesis submission and style guide page	Yes	Not included	Link to US Copyright office website provided	No	N/A
No	No	If searched: on graduate college page	Yes	Not included	Only mentions option; does not provide instructions	No	N/A
No	No	If searched: on the dissertation/thesis submission and style guide page	Yes	Not included	Briefly; link to US Copyright office	No	N/A
Requires committee chair to verify that he or she has discussed options with students	Depends on committee chair's knowledge	If searched: under the current students tab on the graduate school page. Policy is listed on the FAQ page under 'research and writing support.'	Yes	Not included	Committee chair responsible for explaining copyright to advisees.	No	N/A
No	No	"copyright notice" is briefly discussed	Yes	Not included	Mentions option; statements about copyright incorrect	No	N/A
Mentioned but not discussed	Mentioned but not discussed	If searched: on library's website	Yes	Library site includes embargo information	Yes	No	N/A
Weak	No	If searched: pdf on library's website	Yes	Library site includes embargo information	Link to US Copyright office website provided	No	N/A
No	No	If searched: on graduate college website	Yes	Not included	Link to US Copyright office website provided	No	N/A
No	Mentioned but not discussed	If really searched: on dissertation guidelines on grad school	Yes	Not included	Yes	No	N/A
Yes	Yes	If searched: policy appears piecemeal over multiple pages	No	Yes	Yes	No	N/A
No	No	If searched: pdf on graduate college	Yes	Not included	No	No	N/A
No	No	If really searched: on "deposit your work page" on library site	Yes	Library site houses embargo information	Yes	No	N/A
No	No	If really searched: policy is only mentioned on approval form; petition form not found	Yes	Not included	No	No	N/A
Mentioned but not discussed	No	If searched: on library site	Unknown	Yes	No	No	N/A
Provides links to articles about issues	Provides links to articles	If searched	Yes	Yes	Only through UMI	No	N/A
Only on UMI site	No	May not appear even if searched. only appears on dissertation/thesis procedures page	Yes	Not included	No	No	N/A

	Score (out of 100)	Carnegie designation	Embargo policy site	Allows unlimited embargo	Embargo requires extra approval	Allows limited embargo	What is embargo period?	Max embargo	Can one renew? and by what process?
Clark U	-10	RU/H	http://www.clarku.edu/ graduatestudentresources.cfm	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
College of William and Mary	-10	RU/H	http://www.wm.edu/as/graduate/ studentresources/physicalstandards/index.php	Not discussed	Not discussed	Not discussed	Embargo policy never discussed	0	Not discussed
Colorado State	5	RU/VH	http://www.graduateschool.colostate.edu/ current-students/thesis-dissertation/index.aspx	No	No	Yes	1 year, 2 years for MFA in Creative Writing and MA-Creative Nonfiction programs only	2	Not discussed
Columbia U.	5	RU/VH	http://gsas.columbia.edu/content/ electronic-deposit-faqs	No	No	Yes	1 year, 2 years	2	No
Cornell U.	17	RU/VH	http://www.gradschool.cornell.edu/ pubs_and_forms/pubs/thesisbook.pdf	No	No	Yes	Up to five years	5	Yes
Drew U	5	Doc/Prof	http://www.drew.edu/theological/ current-students/gdr-resources/ information-for-graduating-gdr-students/ dissertation-publishing-options	No	No	Yes	6 months, 1 year, 2 years	2	Not discussed
Duke U.	6	RU/VH	http://gradschool.duke.edu/academics/theses/ availability.php	No	No	Yes	6 months, 1 year, 2 years	2	Yes; up to five years from defense date; request made to library admin.
Emory U.	30	RU/VH	https://etd.library.emory.edu/docs/faq	Yes	Embargoes of six years or more	Yes	6 months, 1 year, 2 years, 6 years, indefinite "under special circumstances"	6+	Not discussed
Florida Atlantic U.	5		http://www.fau.edu/graduate/currentstudents/ thesisanddissertation/	No	No	Yes	6 months, 1 year, 2 years	2	Not discussed
Florida International U	10	RU/H	http://gradschool.fiu.edu/downloads/ ETD_approval_form.pdf	No	No	Yes	6 months, 1 year, 2 years	2	Not discussed
Florida State U.	5	RU/VH	http://registrar.fsu.edu/bulletin/grad/info/ grad_degree.htm	No	No	Yes	Up to 2 years	2	No
Fordham U.	-10	RU/H	http://www.fordham.edu/academics/ colleges_graduate_s/graduate_profession/ arts_sciences/gsas_programs_degre/ online_dissertation_78177.asp	Not discussed	Not discussed	Not discussed	Not discussed		Not discussed
Georgia Institute of Technology	0	RU/VH	http://gradadmiss.gatech.edu/thesis.php	No	Yes	Yes	1 year	1	Not discussed
Georgia State U.	5	RU/VH	http://www.cas.gsu.edu/proquest.html	No	Yes from Associate Dean of Research and Grad Studies	Yes	6 months, 1 year, 2 years	2	Not discussed
Georgetown U	0	RU/VH	http://www.etdadmin.com/cgi-bin/main/home	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
George Washington U	10	RU/VH	http://www.gwu.edu/~etds/	No	No	Yes	6 months, 1 year, 2 years	2	No

Explains terms and issues surrounding open access	Explains implications of	Policy visible to prospective students	UMI publishing	Library policy	Copyright Info provided, even if minimal	Link to university operating policy concerning intellectual property	Does OP give students rights to their intellectual property
	open access		agreement				
No; embargo never discussed	Only through UMI	No	Yes	Not included	No	No	N/A
No	No	No	Yes	Not included	Only through UMI	No	N/A
No	No	If searched; on grad school page	Yes	Not included	No	No	N/A
No	No	If searched for; on A & S Grad School FAQ page	Yes	Not included	No	No	N/A
No	No	If searched; in pdf thesis and dissertation guide	Yes	Not included	Yes	No	N/A
Copies UMI's information	No	If searched for; on theological school's page	Yes	Not included	Copies UMI's information	No	N/A
Provides scenarios for considering an embargo, but does not discuss them	No	If searched for; on grad school page	Yes	Not included	Yes, through UMI; library tells students the fee charged by the US Copyright Office	No	N/A
Mentioned but not discussed	Mentioned but not discussed	If searched for; on library ETD page	Yes	Not included	No	No	N/A
No	No	Not in thesis/dissertation guidelines. Only available on UMI submission form.	Yes	Not included	No	No	N/A
No	No	If searched: pdf on grad school page; FAQ on library site	Yes	Not included	No	No	N/A
Mentioned but not discussed	No	If searched: on grad school policies page	Yes	Not included	No	No	N/A
No	No	No	Yes	Not included	No	No	N/A
On library site; http://etd.gatech.edu/ ETD_FAQ.htm#book	Mentioned but not discussed	If searched; on grad studies and admissions page	Yes	Yes	In pdf thesis/diss guide, but not on site	No	N/A
No	No	If searched: site and handbook only mention embargo; actual form provides options	Yes	Not included	Told to contact graduate services for more info	No	N/A
No	No	If searched	Yes	Not included	Referred to UMI	No	N/A
Yes; http://www.gwu.edu/~etds/ publisherissues.html	Yes	If searched	Yes	Not included	No	No	N/A

	Score (out of 100)	Carnegie designation	Embargo policy site	Allows unlimited embargo	Embargo requires extra approval	Allows limited embargo	What is embargo period?	Max embargo	Can one renew? and by what process?
Graduate Theological Union	N/A	Special focus	Does not file electronically. http:// www.gtu.edu/sites/default/files/docs/ gtu-old/Thes.Diss.Guidelines.pdf	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
Harvard U.	10	RU/VH	http://www.gsas.harvard.edu/ student_affairs/clarification_on_ dissertation_submission.php	Allows "ongoing embargo" at time of submission, but never stipulates what that means	Unclear	Yes	6 months, 1 year, 2 years	2	Not discussed
Hebrew Union College	N/A	Special focus	Does Not file electronically. http:// huc.edu/academics/catalog/ gradcn.shtml	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
Howard U.	-8	RU/H	http://www.gs.howard.edu/ announcements/ ThesisDissertationManual- Feb08update.pdf	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
Illinois IT	5	RU/H	Only on pdf about UMI publishing http:// www.iit.edu/graduate_college/ academic_affairs/pdfs/ University_Microfilm_Agreement.pdf	Not discussed	Not discussed	Yes	6 months, 1 year, 2 years	2	Not discussed
Indiana U. at Bloomington	-10	RU/VH	http://www.graduate.indiana.edu/ preparing-theses-and-dissertations.php	Not discussed	Not discussed	Not discussed	Embargo policy never provided	Not discussed	Not discussed
Iowa State U	0	RU/VH	http://www.grad-college.iastate.edu/ current/thesis/resources/embargo.php	No	Yes by thesis office	Yes	6 months	0.5	Not discussed
Johns Hopkins U.	10	RU/VH	http://old.library.jhu.edu/services/cbo/guidelines3.html	Not discussed	No	Yes	6 months, 1 year, 2 years (possibly longer—not clear); refers students to UMI	2	Not discussed
Kansas State U	12	RU/H	http://www.k-state.edu/grad/etdr/ submit/sequester.htm	No	Extension requires Dean of Grad School's approval	Yes	Four years. ('Under compelling circumstances,' one can get special approval-one year at a time-for up to three additional years)	7	Yes—year by year basis, permission of dean
Kent State U. Main Campus	7	RU/H	http://www.kent.edu/library/about/ depts/technicalservices/etd/faq.cfm	No	Not discussed	Yes	Up to three years	3	Not discussed
Lehigh U.	5	RU/H	http://cas.lehigh.edu/CASWeb/ resource.aspx?id=1367	No	For extension	Yes	6 months, 1 year	1	For up to 2 years
Louisiana State U. at Baton Rouge	40	RU/VH	http://gradschool.lsu.edu/files/ item10745.pdf	Allows 'specific period' to be specified	Yes	Yes	1 year, 2 year, and other	2+	Requires form and explanation
Loyola U. Chicago	0	RU/H	http://www.luc.edu/gradschool/ faq2.shtml	Not discussed	Not discussed	Not discussed	Not discussed	0	Not discussed
Marquette U.	12	DRU	http://www.marquette.edu/grad/ etd.shtml#embargoes	No	No	Yes	6 months, 1 year, 2 years	2	Not discussed
Massachusetts IT	10	RU/VH	http://odge.mit.edu/gpp/degrees/thesis/ thesis-hold/	No	Yes; request must be made by student and advisor	Yes	3 months, by petition to Dean for Graduate Education	0.25	Yes; by petition to the Vice President for Research and Associate Provost.

Explains terms and issues surrounding open access	Explains implications of open access	Policy visible to prospective students	UMI publishing agreement	Library policy	Copyright Info provided, even if minimal	Link to university operating policy concerning intellectual property	Does OP give students rights to their intellectual property
N/A	N/A	N/A	Only for GTU/ UC Berkeley joint degrees	Not included	No	No	N/A
Only that concerns exist	No	If searched	Yes	Not included	Language awkward. Student referred to UMI.	No	N/A
N/A	N/A	N/A	No	Not included	No	No	N/A
No	No	No	Yes	Not included	Yes	No	N/A
No	No	May not appear even if searched: it is only mentioned in the pdf which is linked as "University Microfilm Agreement Form (for PHD candidates only)"	Yes	Not included	Not really	No	N/A
No	No	No	Yes	Not included	In grad student bulletin told to contact grad school	No	N/A
No	No	If searched	Yes	Not included	No	No	N/A
No	No	If searched	Yes	Policy on library site	Yes	No	N/A
No	No	If searched: link to further explanation in handbook is broken on grad school website page	Yes	Not included	Only through UMI	No	N/A
No	No	If searched: on library site	Yes	On library site	Only through UMI—although given a link to US gov site for information about copyright	No	N/A
No	No	If searched: policy not discussed on grad school or library site—only on open access permission form	Yes	Not included	Not discussed	No	N/A
No	No	If searched	Yes	Not included	Yes	No, but quotes the policy	Yes
Not discussed	No	No	Yes	Not included	No	No	N/A
Mentioned but not discussed	No	If searched: on grad school site	Yes	Not included	Yes	No	N/A
No	No	If searched: on graduate policies & procedures page	Yes	http:// libraries.mit.edu/ archives/thesis-specs/ #copyright	Yes	Yes, http://web.mit.edu/tlo/ www/community/ policies.html	Not on OP, but linked to oth page: http://web.mit.edu/tlo www/misc/forms.html#MIS FORMS

	Score (out of 100)	Carnegie designation	Embargo policy site	Allows unlimited embargo	Embargo requires extra approval	Allows limited embargo	What is embargo period?	Max embargo	Can one renew? and by what process?
McGill U.	0	N/A	http://www.mcgill.ca/gps/thesis/e-thesis/students	Not discussed	Not discussed	Yes	Up to 1 year	1	Not discussed
Miami U. (Ohio)	10	RU/H	http://www.miami.muohio.edu/graduate-studies/commencement/thesis-dissertation-formatting.html	No	Yes, with advisor's signature, and approval of grad school	Yes	6 months-5 years	5	After 5 years, no additional embargoes permitted
Michigan State U.	0	RU/VH	http://grad.msu.edu/etd/	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
Mississippi State U	2	RU/VH	http://library.msstate.edu/content/templates/ level2-dept-otd/docs/standards_6th_ed.pdf	No	Not discussed	Yes	1 year	1	Not discussed
New York U.	5	RU/VH	http://gsas.nyu.edu/object/ grad.life.dissertationresources	No	Not discussed	Yes	6 months, 1 year, 2 years	2	Not discussed
Northeastern U	5	RU/H	http://www.northeastern.edu/casgraduate/ commencement/thesis_guidelines/documents/ libraries.pdf	No	No	Yes	6	2	Not discussed
Northern Illinois U.	5	RU/H	http://www.niu.edu/grad/thesis/index.shtml	No	Not discussed	Yes	6 months, 1 year, 2 years	2	Not discussed
Northwestern U.	-10	RU/VH	http://www.tgs.northwestern.edu/academics/ academic-services/phd/degree-completion/ index.html	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
Ohio State University	0	RU/VH	http://etd.ohiolink.edu/etd/ faq.html#when-published	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
Ohio University	5	RU/H	http://www.ohio.edu/graduate/etd/upload/ pub_delay.pdf	Not discussed	No	Yes	1 year, 2 years	2	Not discussed
Oklahoma State U.	0	RU/H	http://gradcollege.okstate.edu/student/thesis/ pub_restrict.html	No	Yes	Yes	Normally 1 year	1	Yes, contractual agreement required
Pennsylvania State U	5	RU/VH	http://www.etd.psu.edu/publish.html	No	Embargo; downloadable guide makes limiting access appear only for special circumstances	Yes; see http:// www.etd.psu.edu/ faq_pub.html#3; open access; univ, access;	2 years	2	Not discussed
Princeton U.	10	RU/VH	http://www.princeton.edu/~mudd/thesis/ index.shtml#Embargoes	Not discussed	Yes	Yes	2 years	2	Yes; procedure not discussed
Purdue U.	5	RU/VH	http://www.gradschool.purdue.edu/downloads/ thesis/2007newproquestdissertation agreementform.pdf	Not discussed	No	Yes	6 months, 1 year, 2 years	2	Not discussed
Rice U.	0	RU/VH	http://graduate.rice.edu/onlinethesissubmission/	No	Yes; Advisor must request on student's behalf	Yes	Not discussed	0	Not discussed
Rutgers U., New Brunswick	5	RU/H	http://gsnb.rutgers.edu/style_guide.php3	Not discussed	Not discussed	No	6 months, 1 year, 2 years	2	Not discussed

(continued on next page)

${\bf Ranking\ of\ Institutional\ Policies}\ ({\it continued})$

Explains terms and issues surrounding open access	Explains implications of open access	Policy visible to prospective students	UMI publishing agreement	Library policy	Copyright Info provided, even if minimal	Link to university operating policy concerning intellectual property	Does OP give students rights to their intellectual property
No	No	If searched: in guidelines	Yes	No	No	No	N/A
No	No	If searched:—mentioned in writing guide and options listed on form	Yes	Not included	Yes	No	N/A
Provides links to articles about issues: http:// grad.msu.edu/resources/ copyright.aspx	No	If searched:—on grad school site	Yes	Not included	No	No	N/A
No	No	If searched:—in guide for theses and dissertations	Yes	Not included	Yes	No	N/A
Not beyond "UMI Embargos and Restrictions" guide	Not really	If searched: on A&S graduate school site under doctoral dissertation guidelines	Yes	Not included	No	No	N/A
No	No	If searched: on library Dissertations and Theses page http://library.northeastern.edu/get-help/ theses-dissertations	Yes	On library site	No	No	N/A
No	No	If searched: on graduate school site	Yes	Not included	Minimal	No	N/A
No	No	No	Yes	Not included	No	No	N/A
Mentioned but not discussed	Mentioned but not discussed	If searched: not discussed on grad school page; must look at OhioLINK page and its info is limited	Yes	Not included	No	No	N/A
No	No	If searched: link on graduate school Thesis and Dissertation page http://www.ohio.edu/graduate/ etd/index.cfm	Yes	Not included	Minimal; on FAQ page http:// www.ohio.edu/graduate/etd/ faq2.cfm	No	N/A
No	No	If searched: on grad school page	Yes	Not included	No	No	N/A
Yes, but strongly biased to encourage open access	Yes, but strongly biased against restriction of access	If searched for: only on ETD site	Yes	Not included	Yes, but in guide that must be downloaded, Not on website with other info	No	N/A
No	No	If searched	Yes	Not included	No	No	N/A
No	No	If searched: does not appear linked directly on graduate school site	Yes	Not included	No	No	N/A
No	No	Yes	Yes	Not included	Yes	No	N/A
No	No	Only on the UMI submission form; Not explained in guidlelines	Yes	Not included	On library's site	No	N/A

	Score (out of 100)	Carnegie designation	Embargo policy site	Allows unlimited embargo	Embargo requires extra approval	Allows limited embargo	What is embargo period?	Max embargo	Can one renew? and by what process?
Rutgers U., Newark	-5	RU/H	http://gsn.newark.rutgers.edu/Downloads/ Electronic%20Dissertation%20REV%20050312.pdf	Not discussed	Yes	Yes	One or more years (until you receive the patent)	1+	Not discussed
SMU	5	RU/H	http://smu.edu/graduate/thesis.asp	No	Not discussed	Yes	6 months, 1 year, 2 years	2	Not discussed
Southern Illinois U.	5	RU/H	http://gradschool.siu.edu/ thesis-dissertation-researchpaper/ etd-guidelines.html	No	No	Yes	6 months, 1 year, 2 years	2	Not discussed
Stanford U.	5	RU/VH	http://studentaffairs.stanford.edu/registrar/students/edissertation-faq	No	Not discussed	Yes	6 months, 1 year, 2 years	2	Not discussed
State U. of New York at Albany	5	RU/VH	http://www.albany.edu/gradstudies/files/ Dissertation_DIGITAL_Submission_ Instructions_Amended_7_12a.pdf	No	Yes	Not discussed	Not discussed	Not discussed	Not discussed
State U. of New York at Stony Brook	5	RU/VH	https://www.grad.stonybrook.edu/pdf/academics/t&d/GUIDE-Spring%202012.pdf	Not discussed	Not discussed	Yes	Not discussed	Not discussed	Not discussed
Syracuse U.	5	RU/H	http://researchguides.library.syr.edu/content.php? pid=324607&sid=2672656	Not discussed	For periods longer than two years	Yes	6 months, 1 year, 2 years	2	Not discussed
Temple U.	5	RU/H	http://www.temple.edu/dissertationhandbook/ E-DISSERTATIONINITIATIVE.htm	Not discussed	No	Yes	6 months, 1 year, 2 years	2	Not discussed
Texas A&M U.	5	RU/VH	http://ogs.tamu.edu/current-students/ thesis-dissertation/policies/	Not discussed	Not discussed	Yes	2 years	2	Yes, for one year
Texas Christian U.	-5	DRU	http://library.tcu.edu/howto/thesis.asp	Not discussed	Yes	Yes	Up to 2 years; if longer, must be requested by advisor	2	Not discussed
Texas Tech U.	50	RU/H	http://www.depts.ttu.edu/gradschool/current/ ETDSubmission.php	Yes	No	Yes	5 years or permanent	permanent	Not discussed
Tufts U.	15	RU/VH	http://researchguides.library.tufts.edu/content.php? pid=228260&sid=1997526#6687478	Not discussed	No	Yes	Up to 2 years; if longer contact UMI directly	2	Not discussed
Tulane U	5	RU/VH	http://tulane.edu/liberal-arts/ graduation-deadlines.cfm	Not discussed	No	Yes-discussed only on UMI form	6 months, 1 year, 2 years	2	Not discussed
U. at Buffalo (SUNY)	-5	RU/VH	http://www.grad.buffalo.edu/policies/embargo.php	No	Requires form with 4 signatures, letter from chair, and approval from grad. School	Yes	3, 6, 9 or 12 months	1	Extensions beyond the 12-month hold will be reviewed by the Graduate School on a case-by-case basis with all parties involved.

Explains terms and issues surrounding open access	Explains implications of open access	Policy visible to prospective students	UMI publishing agreement	Library policy	Copyright Info provided, even if minimal	Link to university operating policy concerning intellectual property	Does OP give students rights to their intellectual property
No. But heavily biased towards open access	No	If searched: in guide	Yes	Not included	Yes	No	N/A
No	No	If searched: linked to UMI site	Yes	Not included	Only on UMI site	No	N/A
No	No	If searched: on grad school site	Yes	Not included	Only through UMI	No	N/A
Link broken to "Copyright and Publication Considerations"	Link Broken	If searched: on FAQ page on Office of the Univ Registrar's site	Yes	Not included	Link broken to "Copyright and Publication Considerations"	No	N/A
No	No	Linked through admission and graduate policies site	Yes	Not included	Only through UMI	No	N/A
No	No	If searched: pdf on grad school site	Yes	Not included	Yes	No	N/A
Yes	Yes; but within the context of a page biased to open access; http://researchguides.library.syr.edu/content.php?pid=324607&sid=2672656	If searched: on library site	Yes	On library site	Patents but not copyright	No	N/A
No	No	If searched: on grad school	Yes	Not included	Link broken	No	N/A
No	No	If searched: on grad school site	Yes	Not included	No	No	N/A
No	No	If searched: on library site	Yes	On library site	Yes	No	N/A
No	No	If searched: grad school website says one thing (link), the manual says another (see other)	Yes	Not included	Yes, in manual	No	N/A
Mentioned but not discussed	No	If searched: on library site	Yes	On library site	Only through UMI	No	N/A
No	No	If searched: by school	Yes	Not included	No: On Science and Engineering page it states "Students will pay ProQuest directly for copyrighting, if desired"	No	N/A
Weak.	No	Only if you know to look	links to UMI policy: UMI_ EmbargoesRestrictionsGuide.pdf	Not included	No	No	N/A

	Score (out of 100)	Carnegie designation	Embargo policy site	Allows unlimited embargo	Embargo requires extra approval	Allows limited embargo	What is embargo period?	Max embargo	Can one renew? and by what process?
U. of Alabama	15	RU/VH	http://graduate.ua.edu/etd/	Not discussed	No	Yes	6 months, 1 year, 2 years, 5 years	5	Not discussed
U. of Arizona	-10	RU/VH	http://grad.arizona.edu/academics/ degree-certification/diss-theses/ copyrighting	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
U. of Arkansas	-10	RU/VH	http://ualr.edu/ma/ptwr/uploads/2009/07/ thesisguide.pdf	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
U. of California at Berkeley	0	RU/VH	http://grad.berkeley.edu/policies/guides/dissertation-filing/	Not discussed	Yes, from Dean of Grad Div.	Yes	2 years or more (on form)	2+	Not discussed
U. of California at Davis	20	RU/VH	http://gradstudies.ucdavis.edu/students/ filing.html	Yes-by approval of graduate program chair and graduate council	Only if longer than 2 years	Yes	6 months, 1 year, 2 years	2	Not discussed
U. of California at Irvine	0	RU/VH	http://special.lib.uci.edu/dissertations/docs/ 2010-11_Manual_ETD.pdf	No	Yes	Yes	6 months, 1 year, 2 years	2	Not discussed
U. of California at Los Angeles	10	RU/VH	http://www.gdnet.ucla.edu/gasaa/etd/ thesisguide.pdf	No	No	Yes	6 months, 1 year, 2 years	2	No extension past 2 years
U. of California at Riverside	6	RU/VH	http://graduate.ucr.edu/dissertation.html	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
U. of California at San Diego	0	RU/VH	http://ogsrweb2.ucsd.edu/academicpolicy/ Dissertations_Theses_Formatting_ Manual.pdf	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
U. of California at Santa Barbara	-1	RU/VH	http://www.graddiv.ucsb.edu/handbook/	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
U. of California at Santa Cruz	5	RU/VH	http://graddiv.ucsc.edu/student_affairs/ pdf_student_affairs/ Diss_Guidelines2012.pdf	Not discussed	Not discussed	Yes	6 months, 1 year, 2 years	2	Not discussed
U. of Chicago	-5	RU/VH	http://www.lib.uchicago.edu/e/phd/ publish.html	Not discussed	Yes from deputy provost of graduate education	Yes	Not discussed	Not discussed	Not discussed
U. of Cincinnati	5	RU/VH	http://grad.uc.edu/student-life/etd/ faq.html#embargo	No	No	Yes	2 years at a time, to a maximum of 5 years	5	Embargo form only allows 2 years; no discussion of how to extend
U. of Colorado at Boulder	5	RU/VH	http://www.colorado.edu/GraduateSchool/academics/thesis_sub.html	Not discussed	No	Yes	6 months, 1 year, 2 years	2	Not discussed
U. of Connecticut	5	RU/VH	http://grad.uconn.edu/dissert.html	Not discussed	No	Yes	6 months, 1 year, 2 years	2	Not discussed
U. of Dallas	0	Master's L; Doc/HSS	http://www.udallas.edu/braniff/phd/requirements.html	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
U. of Delaware	34	RU/VH	http://www.udel.edu/gradoffice/polproc/ manual.html	Unclear: it appears that students contact UMI to restrict access, but there's no information whether that uses the standard UMI times or an unlimited embargo	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed

Explains terms and issues surrounding open access	Explains implications of open access	Policy visible to prospective students	UMI publishing agreement	Library policy	Copyright Info provided, even if minimal	Link to university operating policy concerning intellectual property	Does OP give students rights to their intellectual property
Yes	Yes	If searched: on grad school site	Yes	Not included	Yes	No	N/A
No	No	No	Yes	Not included	Minimal	No	N/A
No	No	No: embargo only mentioned in guidelines—no other information provided	Yes	Not included	Yes	No	N/A
Mentioned but not discussed	No	If searched: on grad school site	Yes	Not included	No	No	N/A
No	No	Only discussed on form. Not on website	Yes	Not included	Yes; Need permission of advisor to apply for copyright.	No	N/A
No	No	If searched: in thesis and dissertation manual	Yes	Not included	Yes	No	N/A
No	No	If searched: in thesis and dissertation guide	Yes	Not included	Referred to licensing librarian	No	N/A
No	No	No	Yes	Not included	Yes, in guide	No	N/A
No	No	If searched: in submission manual	Yes	Not included	Yes	No	N/A
No	No	No	Yes	Not included	Yes	No	N/A
No	No	If searched: only on form	Yes	Not included	Yes-but only info about UMI provided	No	N/A
No	No	If searched: on library's dissertation official site	Yes	On library site	No	No	N/A
Only basic UMI generated info	No	If searched: on grad school FAQ site	Yes	Not included	Not really	No	N/A
Only link to UMI site	No	If searched; on UMI site	Yes	Not included	Yes	No	N/A
Only standard UMI Dissertation Agreement info	No	If searched for; on grad school site	Yes	Not included	Only through UMI	No	N/A
Not discussed	No	No	Unknown	Not included	No	No	N/A
No	No	No	Yes	Not included	Yes	No	N/A

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	Score (out of 100)	Carnegie designation	Embargo policy site	Allows unlimited embargo	Embargo requires extra approval	Allows limited embargo	What is embargo period?	Max embargo	Can one renew? and by what process?
U. of Florida	5	RU/VH	http://graduateschool.ufl.edu/files/ checklist-dissertation.pdf	No	No	Yes	6 months, 1 year, 2 years	2	Not discussed
U. of Georgia	10	RU/VH	http://gradschool.uga.edu/ forms&publications/student/ etd_approval.pdf	No	Only extension	Yes	1 year, 2 years	2	Yes, letter from major professor submitted to admin committee of grad school
J. of Hawaii- Manoa	0	RU/VH	http://www.catalog.hawaii.edu/grad-ed/require-procdoctoral.htm	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
J. of Houston	5	RU/VH	http://www.uh.edu/class/students/ graduate/thesis-dissertation-info/ microfilming-copyrighting/index.php	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
U. of Idaho	-8	RU/H	http://www.lib.uidaho.edu/copyright/ research/theses.html	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
U. of Illinois at Chicago	29	RU/VH	http://grad.uic.edu/cms/?pid=1000937	Only in exceptional circumstances	Only for indefinite	Yes	2 years for UIC; 6 months, 1 year, 2 years for UMI	2	Yes for additonal 2 years; by written request to grad office
J. of Illinois at Urbana- Champaign	25	RU/VH	http://www.grad.illinois.edu/ thesis-faqs#Thesis_release_options	Not discussed	Yes. Thesis office must grant extensions	Unclear	6 months, 1 year, 2 years for Proquest; 2 years for IDEALS (state depository)	2	2 years incremental renewal requires petition, but petition link broken
U. of Iowa	-4	RU/VH	http://www.grad.uiowa.edu/ theses-and-dissertations/ thesis-publishing-proquest-contract	Unclear: chair can write letter asking for an embargo	Yes, from grad office	Yes	Not discussed	Not discussed	Not discussed
J. of Kansas	0	RU/VH	http://www.graduate.ku.edu/ 04-02_etd_embargo.shtml	No	Requires form, letter from DGS, and approval from grad. School	Yes	6 months, 1 year, 2 years. But must dowload form to find out.	2	Not clear
J. of Kentucky	5	RU/VH	see also uknowledge.doc http:// www.gradschool.uky.edu/ CurrentStudents/electronic_ dissertation_defense_process.html	No	Yes	Yes	6 months, 1 year, 2 years	2	Not discussed
J. of Louisiana, Lafayette	-6	RU/H	http://gradschool.ucs.louisiana.edu/ sites/gradschool.ucs.louisiana.edu/files/ Guidelines%20final%20-%20Revised%20 Edition%20August%202009%20- %20Updated%20August%202012.pdf	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
J. of Louisville	-8	RU/VH	http://louisville.edu/education/ docstudent/dissertation.html	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
J. of Maryland, College Park	30	RU/VH	http://www.gradschool.umd.edu/ catalog/doctoral_degree_policies.htm	Yes with approval	Only if indefinite	Yes	1 year or 6 years	6	Not discussed

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Explains terms and issues surrounding open access	Explains implications of open access	Policy visible to prospective students	UMI publishing agreement	Library policy	Copyright Info provided, even if minimal	Link to university operating policy concerning intellectual property	Does OP give students rights to their intellectual property
No	No	Mentioned on checklist; options on form; never discussed anywhere else on site	Yes	Not included	No	No	N/A
Mentioned but not discussed	No	If searched: on ETD submission approval form on grad school page	Yes	Not included	No	No	N/A
No	No	No	Yes	Not included	No	No	N/A
No	No	No (likely on agreement form in dean's office)	Yes	Not included	Yes	No	N/A
No	No	No	Yes	Not included	No	No	N/A
No	No	If searched: on grad school site	Yes	Not included	Yes	No	N/A
No	No	If searched: on grad site in thesis FAQs	Yes	Not included	Yes	No	N/A
No	No	If searched; on grad school site and in manual	Yes	Not included	Yes	No	N/A
Mentioned but not discussed	No	Only if you know where to look	Uses UMI, but no link to their policies	https:// documents.ku.edu/ policies/ Graduate_Studies/ Embargo_Policy.htm	No	No	N/A
No	No	Must be searched for on general university website: info not on grad school page	Yes	Not included	Only through UMI	No	N/A
Not discussed	No	No	Yes	Not included	Yes	No	N/A
No	No	No	Yes	Not included	Yes, https:// graduate.louisville.edu/ Programs/ theses-dissertations/	No	N/A
Mentioned but not discussed	No	If searched: in grad school catalog	Yes	Not included	No	No	N/A

	Score (out of 100)	Carnegie designation	Embargo policy site	Allows unlimited embargo	Embargo requires extra approval	Allows limited embargo	What is embargo period?	Max embargo	Can one renew? and by what process?
U. of Massachusetts, Amherst	-10	RU/H	http://www.umass.edu/gradschool/ current-students/doctoral-degree- requirements-and-dissertation-information	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
U. of Memphis	50	RU/H	http://www.memphis.edu/gradschool/ tdinfo_electronic.php#final	Yes, termed 'no access'	No	Yes	3 or 5 years	5	Not explained
U. of Miami	6	RU/VH	https://www6.miami.edu/grad/ETD/guides/ ETDProcess.pdf	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
U. of Michigan	4	RU/VH	http://www.lib.umich.edu/copyright/ publishing-your-thesis-proquestumi	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
U. of Minnesota- Twin Cities	10	RU/VH	http://www.grad.umn.edu/students/ degree_completion/doctoral/ ElectronicDissertationSubmission/index.html	Not discussed	Yes	Yes	6 months, 1 year, 2 years	2	Yes
U. of Mississippi	5	RU/H	http://www.olemiss.edu/gradschool/ Thesis_dissertation_prep.html	No	No	Yes	6 months, 1 year, 2 years	2	Not discussed
U. of Missouri at Columbia	5	RU/VH	http://gradschool.missouri.edu/policies/ thesis-dissertation/guidelines/ basics-ch1.php	Not discussed	No	Yes	6 months, 1 year, 2 years	2	Not discussed
U. of Missouri at Kansas City	5	RU/H	http://sgs.umkc.edu/guidelin/index.asp	Not discussed	No	Yes	6 months, 1 year, 2 years	2	Not discussed
U. of Nebraska at Lincoln	5	RU/VH	http://www.unl.edu/gradstudies/current/ GuidelinesForDissertations.pdf	No	No	Yes	2 years	2	Not discussed
U. of Nevada at Las Vegas	2	RU/H	http://graduatecollege.unlv.edu/PDF_Docs/ TD-EmbargoPolicy.pdf	Not discussed	Yes	Yes; but link to required form provides the undergraduate embargo form, not the graduate	1 year, 2 years, 3 years	3	Not discussed
U. of Nevada at Reno	10	RU/H	http://www.unr.edu/grad/forms/dissertation-filing-guidelines	Not discussed	Not discussed	Yes	6 months, 1 year, 2 years	2	Not discussed
U. of New Hampshire	-10	RU/H	http://gradschool.unh.edu/pdf/ td_manual.pdf	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
U. of New Mexico	45	RU/VH	http://ogs.unm.edu/degree-completion/ thesis-dissertations/electronic- thesisdissertation-embargo.html	Yes	Yes	Yes	2 years, but in 'rare and extraordinary cases' student may petition for their work to be exempted from open access	2+	Yes
U. of North Carolina at Chapel Hill	-5	RU/VH	http://gradschool.unc.edu/student/etd/	No: no exceptions to rule that dissertations must be made publically available	Yes	Yes	No more than one year	1	No
U. of North Carolina at Greensboro	4	RU/H	http://grs.uncg.edu/current/etd-faq/	No	Yes	Yes	1 year, 2 years	2	Not discussed

Explains terms and issues surrounding open access	Explains implications of open access	Policy visible to prospective students	UMI publishing agreement	Library policy	Copyright Info provided, even if minimal	Link to university operating policy concerning intellectual property	Does OP give student rights to their intellectual property
No	No	No	Yes	Not included	No	No	N/A
Minimal	No. Directs students to discuss issue with committee and 'possible future publishers.' Proviso begins with concerns about patents.	If searched for: on grad school site in thesis and dissertation prep guide	Yes	Not included	No information; just a statement of the fee involved (\$55)	No	N/A
No	No	No	Yes	Not included	Yes	No	N/A
No	No	If searched: on library site	No	Yes	Yes	No	N/A
No	No	If searched: on grad school site	Yes	Not included	No	No	N/A
No	No	If searched: on grad school site under –thesis and diss prep	Yes	Not included	Only through UMI	No	N/A
No	No	If really searched:—only on form	Yes	Not included	No	No	N/A
No	No	If really searched:—only on form	Yes	Not included	Yes, but inaccurate explanation of when a work becomes part of public domain	No	N/A
Mentioned but not discussed	No	If searched: in ETD guide	Yes	Not included	Yes, only through Proquest	No	N/A
Yes	Yes	If searched: on grad school site	Yes	Not included	Not really	No	N/A
No	No	If really searched: only on form	Yes	Not included	Yes	No	N/A
No	No	No	Yes	Not included	Yes, only through Proquest. Information about granting of copyright inaccurate	No	N/A
No	Only advantages: http://ogs.unm.edu/ degree-completion/thesis-dissertations/ open-access.html	Yes, on grad school site	Yes	Not included	No	No	N/A
No	No	If searched: on FAQ page of grad school site	Yes	Not included	No	No	N/A
Only UMI generated info	No	If searched: on FAQ page of grad school site	Yes	Not included	Yes	No	N/A

	Score (out of 100)	Carnegie designation	Embargo policy site	Allows unlimited embargo	Embargo requires extra approval	Allows limited embargo	What is embargo period?	Max embargo	Can one renew? and by what process?
U. of North Dakota	7	RU/H	http://graduateschool.und.edu/ graduate-students/current/ overview-submission.cfm	Not discussed	No	Yes	2 years	2	Not discussed
U. of North Texas	5	RU/H	http://tsgs.unt.edu/academics/ thesis-and-dissertations	Implied: "Access choices are listed on the ProQuest agreement form but if these are not sufficient, students must contact ProQuest directly to discuss alternatives."	No	Yes	6 months, 1 year, 2 years	2	Not discussed
U. of Notre Dame	5	RU/VH	http://graduateschool.nd.edu/ resources-for-current-students/dt/	No	No	Yes	Default one year for school; typical 6 months, 1 year, 2 years for UMI (info only on form)	1	Not discussed
U. of Oklahoma Norman Campus	0	RU/VH	http://www.ou.edu/content/dam/gradweb/documents/Forms%20and%20packets/Doctoral/DissertationPacket.pdf	Unclear	Yes	With advisor's signature and approval of Office of Research Services	Not discussed, but Office of Research Services decides the time period	Not discussed	Not discussed
U. of Oregon	5	RU/VH	http://gradschool.uoregon.edu/ etd#Publishing Options	No	No	Yes	6 months, 1 year, 2 years	2	Not discussed
U. of Pennsylvania	10	RU/VH	http://www.upenn.edu/provost/ dissertation_resources	No	No	Yes	6 months, 1 years, 2 years	2	Not discussed
U. of Pittsburgh Main Campus	11	RU/VH	http://www.pitt.edu/~graduate/etd/faq.html	No	No	Yes	Up to 5 years (6 months, 1 year, 2 years–in UMI agreement)	5	Not discussed
U. of Rochester	0	RU/VH	http://www.rochester.edu/theses/	No	If longer than two years	Yes	1 year, 2 years	2	Not discussed
U. of South Carolina at Columbia	-2	RU/VH	http://gradschool.sc.edu/current/ thesisdiss-eo.asp	Not discussed	Yes	Yes	Not discussed	Not discussed	Not discussed
U. of South Florida	7	RU/VH	http://www.grad.usf.edu/thesis.php	No	No	Yes	1 year	1	Not discussed
U. of Southern California	0	RU/VH	http://www.usc.edu/schools/ GraduateSchool/ current_thesis_dissert_02.html	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
U. of Southern Mississippi	0	RU/H	http://www.usm.edu/graduate-school/ graduate-reader	Not discussed	Not discussed	Not discussed	Not discussed	0	Not discussed
U. of Tennessee	19	RU/VH	http://web.utk.edu/~thesis/etdpolicy.shtml	No	Yes	Yes	1 year, 2 years	2	Yes, submit request to grad school
U. of Texas at Austin	-5	RU/VH	http://www.utexas.edu/ogs/etd/ submit.html	No	Yes	Yes	1 year	1	Not discussed
U. of Texas at Dallas	-7	RU/H	http://www.utdallas.edu/dept/graddean/dg!Printing.pdf	No	No	Yes for microfilm	1 year (only for microfilm); no info about ETD embargo	1	Not discussed
U. of Toledo	5	RU/H	http://www.utoledo.edu/graduate/forms/ IntellectualProtection.pdf	No	Yes	Yes-but apparently only for patents	1 year (see form)	1	Yes

Explains terms and issues surrounding open access	Explains implications of open access	Policy visible to prospective students	UMI publishing agreement	Library policy	Copyright Info provided, even if minimal	Link to university operating policy concerning intellectual property	Does OP give students rights to their intellectual property
No	No	If searched: on grad school site overview of manuscript submission	Yes	Not included	Yes, but only through UMI	No	N/A
No	No	If searched: on grad school site	Yes	Not included	Only through UMI	No	N/A
No	No	If searched: on grad school site	Yes	Not included	Only through UMI—in formatting guide	No	N/A
Only for patents	Only for patents	If searched: in dissertation instruction packet	Yes	Not included	Yes	No	N/A
No	No	If searched: on instructions for ETD submission page	Yes	Not included	Yes, only through UMI	No	N/A
Mentioned but not discussed	No	If searched: in dissertation manual	Yes	Not included	Yes	No	N/A
Yes	No	If really searched: on ETD FAQ page–Not called embargo or delay	Yes	Not included	Yes, in format guidelines for ETDs http://www.pitt.edu/~graduate/etd/formatguidelineshtml.html#x1-7000	No	N/A
No	No	No-only on form	Yes	Not included	No	No	N/A
Mentioned but not discussed	No	If really searched: had to search entire site for embargo	Yes	Not included	Yes on separate page; http://gradschool.sc.edu/ thesisdissertation/copyright.htm	No	N/A
No	No	If really searched: only on request form (downloaded)	Yes	Not included	Yes, on library site: http://guides.lib.usf.edu/content.php?pid=56649	No	N/A
No	No	No	Yes	Not included	No	No	N/A
Not discussed	Not discussed	No	Yes	Not included	Yes, only through UMI	No	N/A
UMI generated info	No	If searched: on grad school site	Yes	Not included	Not discussed	No	N/A
No	No	If searched: on grad school site	Yes	Not included	No	No	N/A
No	No	No	Yes	Not included	Yes	No	N/A
No	No	If really searched:—only on form	Yes	Not included	Yes, information provided only on UMI site	No	N/A

	Score (out of 100)	Carnegie designation	Embargo policy site	Allows unlimited embargo	Embargo requires extra approval	Allows limited embargo	What is embargo period?	Max embargo	Can one renew? and by what process?
U. of Utah	5	RU/VH	https://gradschool.utah.edu/thesis/faq.php	No	No	Yes	Up to 2 years	2	Not discussed
U. of Virginia	5	RU/VH	http://artsandsciences.virginia.edu/ gradschool/requirements/ thesis_dissertation_checklist.html	Not discussed	Not discussed	Yes	6 months, 1 year, 2 years (on microfilm agreement-does not appear to use ETD)	2	Not discussed
U. of Washington	15	RU/VH	http://www.grad.washington.edu/students/etd/uw_embargo.pdf	No	No	Yes	6 months, 1 year, 2 years	2	Yes, up to 2 years with approval
U. of Wisconsin at Madison	-8	RU/VH	http://www.grad.wisc.edu/education/ completedegree/ddd.html#4	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed	Not discussed
U. of Wisconsin at Milwaukee	2	RU/H	http://www.graduateschool.uwm.edu/ students/current/graduation/ electronic-theses-dissertations/	No	No	Yes	6 months	0.5	No
U. Toronto	5	N/A	http://www.sgs.utoronto.ca/informationfor/ students/finup/producingthesis.htm	Not discussed	Yes	Yes	1 year, 2 years	2	Not discussed
Vanderbilt U.	16	RU/VH	http://www.vanderbilt.edu/gradschool/ current_students/index.php#theses	No	No	Yes	6 months, 1 year, 2 year	2	Yes by contacting grad school
Virginia Commonwealth U	17	RU/VH	http://www.graduate.vcu.edu/pdfs/ Thesis%20and%20Dissertation%20Manual.pdf	Not clear	No	Yes	6 months, 1 year, 2 years	2	Not discussed
Washington State U.	-1	RU/VH	http://www.gradschool.wsu.edu/ CurrentStudents/PoliciesAndProcedures/ Chapter8/DoctoralPolicies.aspx	No	No	No	None	Not discussed	No
Washington U. in St. Louis	57	RU/VH	http://graduateschool.wustl.edu/files/ graduate/Doctoral_Dissertation_Guide.pdf	Yes	No	Yes	6 months, 1 year, 2 year, or permanent	Permanent	Yes-contacting UMI and WU library
Wayne State U.	-11	RU/VH	http://gradschool.wayne.edu/phd-info/ dissertation_publishing.php	Not discussed	Not discussed	Not discussed	Not discussed; assume typical 6 months, 1 year, 2 years on UMI agreement	Not discussed	Not discussed
Western Michigan U.	8	RU/H	http://www.wmich.edu/grad/guidelines/ 2010%20Guidelines.pdf	Not discussed	Not discussed	Not discussed	Not discussed; assume typical 6 months, 1 year, 2 years on UMI agreement	2	Not discussed
Yale U.	0	RU/VH	http://www.yale.edu/printer/bulletin/ htmlfiles/grad/ policies-and-regulations.html#Dissertation	No	Not discussed	Yes	Refers students to UMI	Not discussed	Not discussed

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*	Explains implications of open access	Policy visible to prospective students	UMI publishing agreement	Library policy	Copyright Info provided, even if minimal	Link to university operating policy concerning intellectual property	Does OP give student rights to their intellectual property
No	No	If searched: on grad school thesis office site	Yes	Not included	Yes	No	N/A
No	No	If searched: on grad school of A & S page	Yes for microfilm only	No	Yes through printing office only-\$70	No	N/A
Mentioned but not discussed	No	If searched: on library ETD FAQ page	Yes	On library site	Yes	No	N/A
No	No	No	Yes	No	Yes	No	N/A
Mentioned but not discussed UMI generated info	No	If really searched: on grad school page but one must search entire site to find it. Not linked on thesis and dissertation page, it only appears—on graduation procedures page	Yes	No	Yes	No	N/A
No	No	If searched: on ETD page	Yes	No	No	No	N/A
No	No	If searched: on grad school site, current students page	Yes	No	Only through UMI	No	N/A
No	No	If searched: in dissertation guide	Yes	No	Only through UMI	Yes; http:// www.research.vcu.edu/ p_and_g/ippolicy.htm	Yes, unless funded by university
No	No	Yes, in handbook. "No material in the dissertation may be restricted in any way; the dissertation must be made available through the Washington State Libraries and UMI for inspection by any interested parties."	Yes	No	No	No	N/A
No	No	If searched: in dissertation guide	Yes	No	Yes	No	N/A
No	No	No	Yes	Not included	Only through UMI	No	N/A
No	No	No	Yes	Not included	No	http://www.wmich.edu/ grad/guidelines/ 2010%20Guidelines.pdf	Yes
No	No	If searched	Yes	Not included	No	No	N/A