In its 3/20/2023 meeting, CAP discussed the proposed revisions to *Presidential Policy on Inventions, Patents, and Innovation Transfer*. The committee commended the effort toward modernizing the policy on innovation transfer and entrepreneurship, as well as expanding the policy’s scope to many types of intellectual property that is important to innovation transfer. Below are our comments and suggestions.

- CAP supports the first major revision that explicitly gives campuses authority over innovation transfer and intellectual property related decisions.

- The second major revision is about expanding the policy’s scope to address unpatentable innovations of interest to extramural sponsors/licensees and unpatentable intellectual property that can generate commercialization income. The latter part does not seem to be clearly laid out. The revised policy defines intellectual property most broadly, covering patents plus almost all types of outcomes of research activities. Among the intellectual property that is unpatentable, some may or may not generate commercialization income. As the intention of this revision is to expand the policy’s coverage, a better definition of unpatentable intellectual property, which seems to be missing from the current version of the policy, should be added.

- Outside of the context of this revised policy but pertinent to CAP is how to evaluate the innovation transfer and entrepreneurship activities during the academic personnel review process. CAP agrees with the Academic Council’s position that these contributions should be assessed with the current framework of the Academic Personnel Manual (APM) and may fall under teaching, research and creative activity, or service. APM provides useful flexibility while maintaining the high standards in the application of review criteria.