

SOUTHWESTERN

LAW SCHOOL
Los Angeles, CA

Telecommuting and Remote Work Policy

Administrative policy approved June 8, 2022.

Revision history: Supersedes telecommuting guidelines distributed in July 2021 and revised in Spring 2022; revised December 7, 2022 (adding reservation of rights); revised March 23, 2023 (adding notification to IT when traveling and limited remote work outside the U.S.); revised May 2024; revised in December 2024 to address assigned remote work; revised in June 2026 as part of the regular review schedule.

Related policies: Telecommuting Programs and Early Friday Release Policy; Guidelines for Intermittent Remote Work; Guidelines for Adjusting Work Schedules; Disability and Accommodations Policy; Policy on Employees Working Primarily Outside of California; Acceptable Use Policy; Information Security Policy; Identity and Access Management Policy; Data Classification and Handling Policy; Travel Notification Policy; Expense Reimbursement Guidelines; Assigned Remote Work Expense Reimbursement Policy; Section F.5 of the Employee Handbook (work location); Faculty Librarian Handbook; Motor Vehicle Use and Safety Policy (in development)

Scheduled Review Date: May 2028 (President and Dean's Office and Human Resources)

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A. Policy Statement

Telecommuting and remote work allow employees whose primary work location is on the Southwestern Law School campus to work from an alternative workplace. Telecommuting and remote work also allow Southwestern to hire or assign employees to work, fully or partially, at an off-campus location. This Policy applies to staff and faculty librarians.

This Policy applies when a Southwestern employee performs approved work remotely, including under the "Telecommuting Programs and Early Friday Release Policy" and the "Guidelines for Intermittent Remote Work," during a pandemic, natural disaster, or other operational disruption, as a reasonable accommodation, or when a position has been designated as partially or fully remote. Employees requesting telecommuting or remote work as a reasonable accommodation should follow Southwestern's procedures for requesting reasonable accommodations.

Telecommuting is not an entitlement or a guaranteed term or condition of employment, unless expressly stated in an employment agreement or approved as a legally required accommodation. Southwestern will evaluate telecommuting arrangements based on the duties of the position, institutional needs, service expectations, student access, team operations, performance, supervision, information security, safety, accreditation and regulatory obligations, and other operational or business considerations. Southwestern will administer telecommuting decisions in a consistent, non-discriminatory, and non-retaliatory manner.

Southwestern reserves the right to direct employees to work remotely due to public- health concerns, emergencies, operational disruptions, or other institutional needs, or to advance the school's mission, programs, and goals.

B. Types of Telecommuting

1. Intermittent telecommuting

Intermittent telecommuting is approved on a case-by-case basis, is infrequent, and may not be used to establish a recurring or predictable remote work schedule (e.g., once a week or a certain number of days per

month). For this situation, Southwestern employees should follow the "Guidelines for Intermittent Remote Work."

Employees must follow the established request process for intermittent remote work. Requests for additional remote workdays beyond approved telecommuting arrangements or institutional programs must be submitted through Southwestern's ADP system for supervisor approval.

2. Regular telecommuting

Regular telecommuting is for ongoing remote work that is either hybrid or remote. It must be supported by a telecommuting agreement on a Southwestern-approved template. The arrangement can, subject to the termination and adjustments section of this Policy (Section G), last for a defined period or continue indefinitely with regular review.

3. Assigned remote work

This arrangement typically applies to employees who are hired or assigned to work primarily at an off-campus work location. Assigned remote work may be temporary, hybrid, or ongoing, depending on institutional needs and the nature of the position. In certain circumstances, employees may be directed to work remotely on a temporary basis because of an emergency, public-health concern, operational disruption, space limitation, space renovation, or other institutional need.

Assigned remote work may, when approved in accordance with Southwestern policy, occur outside California, but within the United States. International remote work is disfavored and will be approved only in extraordinary or institutionally sponsored circumstances. Employees assigned to remote work remain subject to the laws and requirements applicable to the jurisdiction in which they perform their work. Additional requirements, restrictions, approvals, or conditions may apply to out-of-state or international remote work arrangements, including under the Policy on Employees Working Primarily Outside of California. See Section D regarding approved work locations and work performed outside California or the United States.

Human Resources approval is required before materially modifying, ending, or revoking an ongoing assigned remote work arrangement.

C. Eligibility for Telecommuting

Telecommuting may be a viable work arrangement for many positions during a crisis, such as during a pandemic or following an earthquake if campus facilities are damaged. In addition, certain jobs may lend themselves to some or even fully remote work, while other jobs may not support remote work, whether occasional or regular.

A position's suitability for telecommuting is based on operational needs and the duties and responsibilities outlined in the employee's position description. Factors that must be considered in determining whether and to what extent it is appropriate for a certain position to be telecommuting-eligible include, but are not limited to, position responsibilities, impact on a department, impact on the overall program of legal education (academic and non-academic), the ability for students in all academic programs to access services, and accreditation requirements. Southwestern may consider the importance of mentorship, supervision, past performance, collaboration, training, campus engagement, and institutional culture when evaluating existing and proposed telecommuting arrangements.

The department head, in collaboration with Human Resources, is responsible for designating positions as eligible or ineligible for telecommuting and for setting parameters on telecommuting by indicating which job responsibilities can or cannot be performed remotely. Positions that can be designated as eligible for telecommuting are those where all or a significant portion of the core responsibilities can be accomplished at an equal or higher level remotely.

A telecommuting arrangement must preserve the department's ability to provide timely, reliable, and accessible service to students in all academic programs, faculty, staff, alumni, applicants, visitors, and external partners. It must also provide an opportunity for the employee to learn about and engage with the Southwestern campus community.

Requirements for in-person attendance on certain days or for certain events can override even regular telecommuting schedules. Even on days designated as remote-work days, a supervisor may require in-person attendance for student-facing services, meetings, training, campus events, emergencies, accreditation activities, audits, compliance work, onboarding, supervision, or other institutional needs.

Similarly, for telecommuting-eligible positions, the department head may deny a request for telecommuting or discontinue or alter a telecommuting arrangement for various reasons, including employee performance concerns and concerns

about the suitability of the employee's remote workspace—especially regarding safety and information security.

D. Approved Work Locations and Travel Requirements

1. Approved work location

Employees may perform remote work only from the location(s) approved in writing by Southwestern. An employee must obtain advance written approval from the supervisor and Human Resources before performing work from any other location for more than five consecutive workdays, more than ten full or partial workdays in a fiscal year, or any period that may create payroll, tax, benefits, workers' compensation, licensing, data security, export control, sanctions, immigration, or foreign-law obligations. Department heads are encouraged to develop an annual tracking system for those they supervise.

Employees may not relocate or materially change an approved remote work location in a manner that increases Southwestern's legal, operational, tax, compliance, technology, or reimbursement obligations without advance written approval from their supervisor and Human Resources.

Absent an emergency, approved travel on school business, or another unusual circumstance, employees should generally perform remote work from a location that is reasonably secure, professional, and suitable for the work being performed. Employees should avoid performing remote work from public or shared environments, such as coffee shops, public seating areas, or similar locations, when doing so could create confidentiality, information security, distraction, or professionalism concerns. Employees should also comply with the information-security and confidentiality requirements in Section E.20.

2. Work outside of California

An employee may not perform work outside California without advance approval from Human Resources under the Policy on Employees Working Primarily Outside of California. Human Resources will consult with the Dean, Finance, Information Technology, and legal counsel as needed.

Approval is not automatic. Depending on the circumstances, approval may require Southwestern to register to do business in another jurisdiction; modify payroll, tax, workers' compensation, or benefits administration; implement additional compliance or information-security measures; use a

third-party Employer of Record; or impose additional conditions or limitations.

Requests for out-of-state remote work will be evaluated under the Policy on Employees Working Primarily Outside of California and based on applicable legal, operational, compliance, accreditation, student-service, technology, information-security, administrative, and resource considerations.

3. International work

An employee may not perform work outside the United States unless approved in advance and in writing by the Dean following a review by Human Resources, Finance, Information Technology, and legal counsel, as appropriate. International remote work will be approved only in rare and exceptional circumstances, typically involving institutionally sponsored programs, temporary institutional assignments, or other compelling institutional needs.

4. Working while traveling

Employees must receive advance written approval from their supervisor and, where necessary, Human Resources before traveling on school business or traveling on a day when they are scheduled to work, including working remotely (e.g., the employee is going to travel part of the day for personal reasons). This approval pertains to travel inside and outside California. Please refer to Employee Handbook Section H.3.e for vacation notice requirements.

To help protect Southwestern systems and avoid disruption of access to institutional accounts or services, employees who expect to access Southwestern systems while traveling outside the state of the primary work location must notify Information Technology in advance, and at least three business days in advance when practicable, in accordance with applicable IT procedures. Employees should provide the destination state or country, anticipated travel dates, and expected duration of travel. Employees must copy their supervisor on the notice.

Additional restrictions, security requirements, approvals, or access limitations may apply to international travel or access from certain jurisdictions. See Travel Notification Policy.

5. Campus presence and institutional access

Southwestern may require remote employees to report to campus or another designated location for meetings, training, events, operational needs, accreditation activities, emergencies, or other institutional purposes.

Employees assigned to ongoing remote work generally will not be assigned a dedicated private office or permanent on-campus workspace unless approved by Human Resources based on operational, institutional, business, or other relevant considerations. When working on campus, such employees may be provided shared, hoteling, temporary, or other flexible workspace arrangements based on institutional needs and space availability.

E. Specific Telecommuting Guidelines

1. Written telecommuting agreement

Each employee who is approved to telecommute will be asked to sign a written telecommuting agreement that specifies the location(s) from which the employee will telecommute and confirms work hours and compliance with this Policy. An agreement is not valid until signed by the supervisor and Human Resources.

2. Work hours

Unless otherwise requested in advance and approved under Southwestern's "Guidelines for Adjusting Work Schedules," an employee's regular hours and days of work will not change when the employee telecommutes. The employee is expected to perform duties and responsibilities during work hours as the employee would do if the employee were on campus. Please see Section F for additional information about non-exempt employee hours.

3. Performance expectations

Performance expectations and evaluations are neither changed nor waived while an employee is telecommuting. Employees who are approved for a telecommuting arrangement must continue to abide by all Southwestern policies and procedures. In addition, expectations for timely completion of work, meeting attendance, responsiveness to email and other communications, and other performance criteria are the same for telecommuting employees and those working on campus. Supervisors

should apply the same performance standards to employees, regardless of work location.

4. Salary and benefits

An employee's salary will not be affected by telecommuting. As explained in the Employee Handbook, some benefits will not be available to employees who work remotely at locations outside of California.

5. Reimbursable expenses

Southwestern will reimburse employees for necessary and reasonable business expenses incurred as a direct consequence of performing assigned duties or complying with Southwestern's directions, consistent with applicable law and Southwestern reimbursement policies. Employees must obtain advance approval when practicable, use Southwestern-provided equipment and services when available, and submit itemized documentation within 30 days after receiving and paying the bill or otherwise incurring the expense. Late, incomplete, or unapproved submissions may be denied when permitted by law and may also be addressed as a performance or compliance issue. Nothing in this Policy is intended to limit Southwestern's obligation to reimburse expenses that are legally required to be reimbursed.

Employees who are hired or assigned to work remotely may incur necessary business expenses associated with remote work, such as expenses arising from the required use of personal mobile phones or home internet services. Employees who are assigned or required to work remotely are subject to the Assigned Remote Work Expense Reimbursement Policy. See Section B.3 above regarding assigned remote work.

Employees who voluntarily elect to work remotely for their own convenience generally are responsible for ordinary costs associated with their chosen remote work location, including personal residence costs, utilities, and optional equipment, unless Southwestern requires the expense, approves it in advance, or determines that the expense is a necessary and reasonable business expense subject to reimbursement under applicable law or Southwestern policy.

6. Travel reimbursement

For employees whose assigned primary work location is campus, travel between the employee's residence or any voluntary telecommuting

location and campus generally constitutes normal commuting and is not reimbursable.

For employees whose assigned primary work location is an approved remote work location, required travel to campus or another Southwestern location will generally be treated as business travel and reimbursed in accordance with Southwestern's Expense Reimbursement Guidelines, unless otherwise provided in the employee's telecommuting agreement.

7. Using a personal vehicle

While telecommuting, an employee may not use their personal vehicle for Southwestern business unless specifically authorized in advance by a supervisor.

8. Professional environment/dependent care

Each telecommuting employee is responsible for establishing and maintaining a work environment that supports productivity, professional workplace conduct, and the confidentiality of records and conversations. Telecommuting is not a substitute for dependent care or other personal responsibilities during working time. Employees are expected to make arrangements that allow them to perform their duties, remain available as required, participate in meetings, and protect confidential information while telecommuting.

During emergencies, public health events, school closures, caregiving disruptions, or other unusual circumstances, supervisors may work with Human Resources to approve temporary schedule adjustments, leave, or other flexible arrangements consistent with institutional needs and applicable law. Employees should communicate in advance with their supervisors regarding circumstances that may affect their availability or ability to perform their duties while telecommuting. Nothing in this section alters Southwestern's accommodation processes or obligations.

9. Virtual meeting etiquette

Employees should keep their audio muted unless speaking and typically should use an approved Southwestern Zoom background, a blurred background, or a room divider if not in a traditional office setting. Employees should give their full attention to the meeting and avoid multitasking.

Employees should participate in meetings from a location that is reasonably private and suitable for the subject matter being discussed. An

employee may not participate in a meeting from a public location or other setting where unauthorized persons may overhear the discussion or view information displayed on the employee's screen if doing so could compromise confidentiality, privacy, information security, or other institutional interests. Employees participating in meetings from non-private locations must take reasonable measures to protect confidential information, including using headphones and other appropriate safeguards.

10. Remote workplace safety and suitability

Each telecommuting employee is responsible for establishing and maintaining a remote workspace that is reasonably safe and suitable for the work being performed. Employees are expected to maintain their workspace to support safe working conditions and effective job performance.

Before beginning regular or assigned remote work, and periodically thereafter, Southwestern may require employees to complete a remote-work safety checklist. Employees must promptly report work-related safety concerns or conditions that may materially affect their ability to work safely.

Southwestern may request additional information about the safety or suitability of an approved remote workspace when there is a work-related injury, a request for ergonomic equipment or accommodation, or another legitimate business reason. Any in-person inspection or visual review of a remote workspace will be limited to the designated work area, coordinated through Human Resources, and scheduled with reasonable advance notice when practicable.

11. Employee accessibility

Absent a separate, approved schedule adjustment, each employee telecommuting must be available starting at 9 a.m. Pacific Time and remain available and communicative until 6 p.m. Pacific Time (4 p.m. Pacific Time on Fridays) via phone, email, video, or another platform designated by the supervisor (e.g., Teams). Exempt employees must also be available when needed to perform their job duties, even if outside of regular business hours. A supervisor may require any telecommuting employee to complete a daily or weekly assignment log or submit a written list, report, update, or summary of work accomplished and the status of assignments.

12. Supervisor responsibilities

Supervisors are expected to establish procedures for effective communication, including frequency of e-mails, other electronic communication, or telephone contact. A supervisor may require a telecommuting employee to respond to certain types of communications within a set timeframe (e.g., acknowledging a Teams message within one hour, during regular business hours; acknowledging receipt of an email within a certain number of hours, etc.). The supervisor should communicate these expectations to the telecommuting employee in writing.

13. Equipment and supplies

Each telecommuting employee is responsible for ensuring they have appropriate equipment, connectivity, and supplies to perform their assigned job duties. Southwestern will provide basic equipment necessary for approved remote work. The Information Technology office will determine what equipment is necessary, based on the employee's position, operational needs, and institutional standards. Equipment packages may differ. Employees who require additional equipment, supplies, software, or technical support should consult their supervisor, who may coordinate with Information Technology to submit appropriate requests. Supplies and equipment should be obtained through regular departmental purchasing processes when applicable. Information Technology will maintain records of Southwestern-owned equipment assigned to employees.

All equipment, software, data, and supplies provided by Southwestern remain Southwestern property. Before beginning regular or assigned remote work, employees will be required to sign a Telecommuting Agreement that includes responsibilities for protecting Southwestern property, equipment, systems, and information from loss, theft, damage, unauthorized access, misuse, or disclosure. Employees must immediately notify their supervisor and Information Technology at ithelp@swlaw.edu of any actual or suspected loss, theft, damage, unauthorized access, misuse, disclosure, or security incident involving Southwestern property, equipment, systems, or information.

Southwestern may require employees to bring, deliver, or ship Southwestern property to Southwestern for inspection, maintenance, repair, replacement, reassignment, return, upgrades, security review, or

other legitimate business purposes. Southwestern will generally pay reasonable pre-approved shipping or delivery costs associated with these activities for employees who are assigned or required to work remotely. Employees may be responsible, to the extent permitted by applicable law, for additional costs arising from unauthorized relocation of equipment, willful misconduct, gross negligence, misuse of Southwestern property, or failure to timely return Southwestern property after separation from employment or after a written request for return.

Upon separation from employment or upon request by Southwestern, employees must promptly return all Southwestern property in their possession. Employees may not connect unauthorized devices, storage media, peripherals, or software to Southwestern systems when prohibited by Information Technology or when doing so could create a security or confidentiality risk. Southwestern is not responsible for damage to, loss of, or repairs for employee-owned equipment.

14. Authorized use of Southwestern property and systems

Southwestern equipment, systems, accounts, software, supplies, and institutional resources are provided primarily for institutional business purposes and remain subject to Southwestern policies governing acceptable use, confidentiality, information security, and institutional property. Only incidental personal use consistent with Southwestern policy is permitted. Employees may not duplicate Southwestern software for personal use or permit unauthorized persons to access Southwestern property, equipment, systems, software, accounts, or institutional information. Employees on approved leaves of absence should not access Southwestern systems and accounts.

15. Workers' compensation/reporting injuries

Employees must promptly report any work-related injury or illness occurring while telecommuting to their supervisor and Human Resources, and in no event later than 24 hours after the injury or illness, using Southwestern's standard injury-reporting procedures. Workers' compensation coverage for any reported injury or illness will be determined in accordance with applicable law and Southwestern's workers' compensation procedures. Employees are responsible for accurately identifying the date, time, location, circumstances, and activity being performed when the injury or illness occurred.

16. ADA accommodations

Requests to telecommute or work remotely as a disability, pregnancy, religious, or other legally protected accommodation must be referred to Human Resources and will be evaluated under Southwestern's applicable accommodation policies and procedures. The designation of a position as ineligible for discretionary telecommuting does not, by itself, resolve whether remote work or another accommodation may be required as a reasonable accommodation.

Southwestern may review or modify an accommodation-based remote-work arrangement when legally permitted, but no supervisor may deny, modify, suspend, or revoke such an arrangement without consulting Human Resources and following the applicable accommodation process.

17. Requesting and recording leave time

Employees must seek advance approval from their supervisor to use sick leave (when possible and as soon as practicable if not possible in advance), vacation, time off, or other leave credits. Each employee is responsible for recording vacation, sick leave, or other leave in the same manner as if working on campus. Telecommuting or remote work does not alter an employee's obligation to accurately record time worked and leave taken or to obtain required approvals for leave.

18. Southwestern policies, practices, and procedures

All employees are responsible for complying with Southwestern policies, practices, and procedures while telecommuting.

19. Tax and insurance consequences/zoning

Employees are responsible for personal tax consequences, personal insurance coverage, homeowners' or renters' association rules, lease restrictions, and local zoning or home-business rules that may apply to their chosen remote-work location. Southwestern is responsible for determining and administering employer obligations that it concludes are applicable to an approved remote-work arrangement, including payroll, unemployment insurance, workers' compensation, benefits, registration, or similar obligations. No remote-work arrangement may be approved if Southwestern determines that the arrangement creates unacceptable legal, financial, administrative, or operational burdens.

20. Information security and confidentiality

a. Remote-work security baseline

Employees must comply with all Information Technology policies, including Southwestern's Acceptable Use Policy, Information Security Policy, Data Classification and Handling Policy, Identity and Access Management Policy, FERPA obligations, and all other confidentiality, privacy, and data-security requirements when working remotely. Employees may access Southwestern systems only through Southwestern-approved devices, accounts, authentication methods, and secure networks. Employees must use multi-factor authentication where required and may not share passwords, authentication tokens, devices, accounts, or institutional data with any other person.

b. Public networks and devices

Employees may not use unsecured wifi to access Southwestern systems unless using a Southwestern-approved VPN, hotspot, or other approved security measure. Southwestern data may not be downloaded, stored, copied, or transmitted to personal devices, personal cloud storage, personal email accounts, removable media, or unauthorized applications.

c. Confidential information and paper records

Employees must protect confidential information, including student education records, personnel records, financial information, donor information, applicant information, privileged communications, and other confidential legal or institutional materials, from unauthorized access, disclosure, or misuse. Employees should avoid printing confidential documents at remote locations unless approved and operationally necessary. Any printed confidential materials must be secured and returned, destroyed, or disposed of using approved methods.

Employees should also take reasonable measures to prevent unauthorized persons from overhearing confidential conversations or viewing confidential information displayed on screens or in physical documents.

d. Institutional property and work product

All Southwestern equipment, systems, data, documents, records, and work product used, created, accessed, or modified while telecommuting remain Southwestern property.

e. Connectivity and technical support

Unless otherwise approved or required by Southwestern policy, employees are responsible for obtaining and maintaining reliable internet connectivity necessary to perform their job duties remotely. Southwestern may provide limited hardware, software, and technical support consistent with institutional policies and available resources.

f. Incident reporting and protective measures

Employees must immediately report lost or stolen devices, suspected unauthorized access, misdirected emails, phishing attempts involving Southwestern credentials, or any actual or suspected disclosure of confidential information to Information Technology and their supervisor. Southwestern may disable access, require the return of equipment, or remotely restrict, remove, or wipe Southwestern data from a device when necessary to protect institutional systems, confidential information, or Southwestern property.

F. Non-Exempt Employees

Employees and supervisors must comply with all timekeeping and overtime regulations defined by state or federal law and Southwestern policy. Overtime-eligible employees must seek advanced written approval from their manager to work overtime.

Southwestern employees may perform job duties using a variety of electronic communications, depending on the nature of the work and responsibilities involved, including cell phones and laptop computers. As with other types of authorized work, all time spent by non-exempt employees using electronic communications for work purposes will be considered hours worked; the time is compensable and will count toward overtime eligibility as required by law. Therefore, to avoid incurring unnecessary expenses, non-exempt employees should not check for, read, send, or respond to work-related emails or other communications outside their normal work schedules unless specially authorized based on job duties or expressly directed by their supervisor to do so.

Non-exempt employees are required to accurately record all hours worked using the ADP system. Hours worked in excess of those scheduled per day and per workweek require the advance approval of the employee's supervisor. Non-exempt employees

must take their scheduled one-hour meal break and required rest periods each workday and must obtain advance written permission from their supervisor before working unscheduled overtime hours. Failure to comply with this requirement may result in the immediate termination of telecommuting privileges.

G. Modification, Suspension, or Termination of Approved Telecommuting Arrangements

Southwestern may discontinue, modify, suspend, or adjust an employee's telecommuting arrangement at any time based on operational, staffing, performance, compliance, safety, business, or other institutional considerations. Southwestern will generally endeavor to provide at least two weeks' notice before materially modifying or ending an approved telecommuting arrangement; however, circumstances may arise in which little or no notice is possible.

Telecommuting arrangements approved as a reasonable accommodation under applicable disability, pregnancy, religious, or other accommodation laws are subject to Southwestern's accommodation processes and may not be modified, suspended, or discontinued without consultation with Human Resources and consideration of applicable legal requirements.

An employee hired or assigned to ongoing remote work who wishes to transition to primarily on-campus work must consult their supervisor and Human Resources sufficiently in advance to allow for operational, staffing, workspace, technology, and other institutional considerations. Approval of a transition to primarily on-campus work is not guaranteed and will depend on institutional needs, position requirements, workspace availability, budgetary considerations, and other relevant factors.

H. Consequences of Violating This Policy

Violation of this Policy may result in corrective action, disciplinary action, suspension or revocation of telecommuting privileges, suspension of system access, or termination of employment. Southwestern may immediately suspend remote access when necessary to protect institutional operations, systems, confidential information, student records, or Southwestern property. Questions about eligibility, approvals, schedule changes, accommodations, reimbursement,

or policy interpretation should be directed to Human Resources at hr@swlaw.edu. Questions about equipment, access, or information security should be directed to Information Technology at it@swlaw.edu.

I. Policy Revisions

Southwestern expressly reserves the right to change or modify any aspect of this Policy and the related protocols at any time, with or without prior notice.