The meeting was called to order at 3:05 p.m. Dean Susan Pfeiffer welcomed members and visitors. The Dean called for a motion to adjourn no later than 5:00 p.m.

**MOTION (duly moved and seconded)**

THAT the Graduate Education Council meeting of **May 19, 2009** will adjourn no later than 5:00 p.m.

The motion was **CARRIED**.

**Approval of the Agenda of the Graduate Education Meeting of May 19, 2009**

At the request of the Faculty of Medicine, item 9, the closure of the Collaborative Program in Health Care, Technology and Place, was withdrawn.

**MOTION (duly moved and seconded)**

THAT the agenda of the Graduate Education Council meeting of **May 19, 2009**, with the withdrawal of item 9, dealing with the disestablishment of the “Collaborative Program in Health Care, Technology and Place”, be approved.

The motion was **CARRIED**.

1. **Minutes of the Graduate Education Council Meeting of April 21, 2009**

   The minutes of the **April 21, 2009** meeting were distributed with the agenda.

   **MOTION (duly moved and seconded)**

   THAT the minutes of the Graduate Education Council meeting of **April 21, 2009** be approved.

   The motion is **CARRIED**.

2. **Business Arising from the Minutes**

   2.1 **Subsequent Considerations of GEC-approved items**

      **Master of Global Affairs (MGA): New Program**

      GEC approved a new Master of Global Affairs (MGA) program at its meeting on January 20, 2009. The new program was approved by Governing Council at its meeting on April 16, 2009. This constitutes final University approval. The OCGS standard appraisal is in progress.
Graduate Academic Appeals Board (GAAB): Regulation Change

GEC approved a minor change to GAAB regulations at its meeting on April 21, 2009. The change extends the period when students may seek informal mediation to any stage before hearing an appeal, including before filing an appeal. The change also provides for student access to an alternate mediator in the event of an actual or perceived conflict of interest. The proposal was approved by the Academic Planning and Programs Committee of Academic Board on May 12, 2009; this constitutes final approval.

2.2 Repositioning of SGS Centres and Institutes

Graduate Centre for Study of Drama: Disestablishment/Reestablishment

At its meeting on January 20, 2009, GEC approved the disestablishment of the Graduate Centre for Study of Drama as an EDU:A within SGS and its re-establishment as an EDU:A within the Faculty of Arts and Science. The proposal was approved by Governing Council at its meeting on April 16, 2009. This constitutes final approval for the May 1, 2009 transfer.

Centre for Industrial Relations and Human Resources (CIRHR)

At its meeting on April 21, 2009, GEC approved the disestablishment of the Centre for Industrial Relations and Human Resources as an EDU:A within SGS and its re-establishment as an EDU:A within the Faculty of Arts and Science effective July 1, 2009. The proposal has since been approved by the Planning and Budget committee at its meeting on May 7, 2009. The proposal is on the agenda of Academic Board’s June 1, 2009 meeting, and final approval from Governing Council is required. The significance of this item is that it constitutes the last move of a Centre or Institute from SGS to another divisional home. The following comments will be presented by the Dean at Academic Board.

For over three decades, the School of Graduate Studies has served as an incubator for interdisciplinary initiatives in research and graduate education. The aspirations articulated in the Stepping Up planning exercise included strong support for interdisciplinarity as a pervasive force, and for the linking of our three core activities: undergraduate education, graduate education and research. The other 16 Faculties at U of T have demonstrated their abilities to mount and sustain interdisciplinary initiatives. So, in 2004 we embarked on a path to place the SGS Centres & Institutes, which numbered fifteen at that time, into new, more appropriate administrative homes, and to wind down those activities at SGS that were necessitated by its “Faculty” status. With that decision of Academic Board on June 1st, the governance aspect of that transition is complete. In the months to come, SGS will complete the budgetary transfers to the receiving Faculties. There have also been staffing adjustments within SGS. Some positions have ended. Others that were partially directed toward the centres and institutes have been re-positioned to provide greater service and support for our graduate students and graduate programs. As a result, U of T has one less “Faculty” unit, and the former SGS Centres & Institutes are positioned to get the full range of managerial and advancement support that they need, and to be better integrated. So, this is a major set of activities that, as of June 1st, will be completed.
3  Dean’s Remarks

3.1  General Meeting of Graduate Administrators
The spring General Meeting of Graduate Administrators took place on April 30, 2009. Over 100 graduate administrative staff members were in attendance. Representatives from SGS provided updates on graduate policy and procedure, and answered questions.

Among the topics covered were the Concurrent Registration Option (CRO), changes to the processing of restricted graduate awards payments, and guidelines for the use of INC, SDF and WDR grades.

3.2  Distance Education (Technology-Assisted Education)
SGS sent a survey to all Faculties in 2008 with questions on interest and activities in distance education. The results are available from the Governance section of the SGS website, on the “Policies and Guidelines” page. A set of best practices that was developed in 2000 have now been updated and appended to the report. It is hoped this information is helpful and will be of use to you going forward.

3.3  Awards Update
A reception for recipients of the Governor General’s Gold Medal will be held on June 2, 2009 from 4:00 to 6:00 p.m. at Massey College. The reception will also honour winners of awards from the Canadian Institutes of Health Research (CIHR), SSHRC, NSERC, and the Canada Graduate Scholarships, Master’s, i.e., all students receiving awards.

For SSHRC, 124 award winners from U of T have been announced. This is about 38 percent of our nominee quota, which is in line with our usual success rate.

For NSERC, there are 245 U of T award winners, which is about 75 percent of our nominee quota. Again, this is in line with our usual success rate.

The CIHR portfolio is managed quite differently; we are unable to report numbers at this time.

For OGS, 899 award winners from U of T, with 235 on the reversion list, have been announced. Collectively, this is about 40 percent of our nominees which is in line with our usual success rate.

This was the first year of the Vanier Awards. Of the 166 awards, 34 went to students from the University of Toronto. The Canadian Government sees this award as equivalent to a Rhodes or Fulbright. It brings $50,000 tax-free for 3 years, making it bigger than the Fulbright. International doctoral students are eligible, and of the 34 U of T winners, 8 were international students. A member noted that McGill University had announced its Vanier winners in the Globe & Mail and asked whether this would be done for U of T. It was explained that U of T had taken an advertisement in the Globe and Mail two weeks prior, when the Vanier prizes were awarded.

The Dean expressed her hope that those present would attend the reception.

3.4  Survey of GEC Members
A survey that will evaluate Graduate Education Council members’ experiences over the past year was made available at the start of the meeting on yellow paper. The Dean encouraged members to complete the survey and submit it at the end of the meeting.

3.5  SGS Reception
The Dean reminded members of the year-end reception at Massey College following the meeting to celebrate the work done this year.
4  Report of the Vice-Dean, Programs

Summary of Final Oral Examinations (FOE) and Graduating Students

There have been a total of 710 final oral examinations in the period from May 1, 2008 to April 30, 2009. While this is nearly the same as last year (708), the process has been very different. Virtually all committees this year were pre-approved using the new on-line preapproval system which is working well. Approximately two percent of nominations for external appraisers were not approved on first nomination and required a second appraiser to be nominated for a variety of reasons including lack of arm’s length relationship with supervisor.

Approximately 2,000 graduands are expected for this year’s June Convocation of over 13,000 graduate students.

5  Report of the Vice-Dean, Students

Launch of Graduate Professional Skills (GPS) Program

The “soft” launch of the GPS has been successful and many members will have seen a memo alerting the University community, including students, to the event. In the first week, 150 students indicated interest in enrolling. This number is encouraging; we will gauge how well we can provide courses for all these people. The work done over the past year to prepare this program seems to be paying off with student interest. A bigger launch of the program is planned for September 2009.

6  Graduate Academic Appeals Board (GAAB): Approval of Membership for 2009-2010

The Graduate Academic Appeals Board (GAAB) is a standing committee of GEC. Appointment of the Chair of GAAB is approved by GEC upon the nomination of the Dean of SGS. Appointment of faculty members is approved by GEC upon the nomination of the Vice-Dean, Students and the recommendation of the Committee on Student Matters. Appointment of student members is approved by GEC upon the nomination and election by the student members of GEC. GEC approval is final. The full membership of GAAB for 2009-2010, should the motion be approved, is listed on the motion sheet.

A minor correction was noted to the motion distributed with the agenda. Professor Luigi Girolametto, who is nominated as a faculty member, is from Division IV, not Division II.

The Dean called on Vice-Dean Berry Smith to present the motion.

Revised MOTION (duly moved and seconded)

THAT Graduate Education Council approve the appointments of a Chair, Alternate Chair, two faculty and three student members to serve on the Graduate Academic Appeals Board for the 2009-2010 academic year as follows:

- Chair: Ralph Scane, Faculty of Law (renewed)
- Alternate Chair: Lorne Sossin, Faculty of Law (renewed)
- Faculty Members: Russell Kazal, Division I
- Luigi Girolametto, Division IV
- Student Members: Jason Grenier, Division III
- Behnam Nowrouzi-Kia, Division IV
- Kimberley Radmacher, Division I
Professor Chris Damaren’s department affiliation is corrected on the revised supporting document listing all GAAB members – it is Aerospace Science & Engineering not Chemistry.

No further discussion arose, so the Dean called the question.

The motion was **CARRIED**.

### 7 New Degree Program: Master of Science in Applied Computing, M.Sc.A.C.

The proposal was approved by the Department of Computer Science on December 4, 2008 and by the Faculty of Arts and Science Three Campus Graduate Curriculum Committee (3CGC) on April 15, 2009. No substantive discussion arose at the 3CGC meeting. If approved by GEC, the proposal will be brought to the Academic Policy and Programs Committee, the Planning and Budget Committee, and the Academic Board of Governing Council for approval, and to Governing Council for final University of Toronto approval. The proposal will be submitted to OCGS for a standard appraisal.

Professor Sven Dickinson, accompanied by Professor Allan Borodin, was present to introduce the topic and answer questions, if any. The Dean called on Vice-Dean Elizabeth Cowper to present the motion.

**MOTION (duly moved and seconded)**

**THAT Graduate Education Council approve the proposal of the Faculty of Arts and Science, Department of Computer Science, for Master of Science in Applied Computing program leading to a Master of Science in Applied Computing (MScAC) degree, effective September 2010.**

Professor Dickinson began by saying that the program was being established in response to a couple of trends. More and more students are pursuing careers in industry rather than academia. The Department has also been working on increased engagement with local industry. To reflect both trends, the new program involves a strong internship component in addition to courses. We have the strongest graduate program in the country and Toronto has the strongest information technology hub. The Department’s hope is to bring these together to have the strongest professional master’s program. The proposal has, as its basis, a survey done with local companies and students which established a market need for this type of program.

A member inquired about the program’s academic competitors. Professor Dickinson responded that the University of Waterloo has started a similar program.

In response to a question from a member, Professor Dickinson said that while there is no professional accreditation body for this area, each student would be assigned a Departmental faculty member who would ensure the quality of the internship.

A member asked whether there might not be overlap between the proposed program and professional master’s programs offered by the Faculty of Information. Professor Dickinson replied that he would not expect significant overlap. Professor Borodin added that, while there would be a few areas of overlap, many areas would not because the types of projects, skills and research should not be common with those in the Faculty of Information.

A member asked whether it was common for a program to have such a large internship component (3.0 FCE), and whether this might devalue the graduate nature of the program. Professor Dickinson replied that students would be required to follow one of the program’s core courses while doing the internship and would therefore still be closely involved with the Department. The Dean noted that there are other programs at the University with internship components; a member added that the
Master of Biotechnology program’s internship component could also be considered substantial at 2.0 FCE.

A member asked whether there would be sufficient research in the program. Professor Borodin replied that each course in the program would have a research component, and that while the program involved an internship, this internship would arise from research conducted by faculty rather than merely filling a gap in an industry partner’s workforce. The Dean noted that OCGS by-laws require a substantial amount of independent research in graduate programs. The University has differentiated between its research and professional programs, but even professional programs are required to have strong research components.

A member asked how the fact that students would be paid a salary during the internship could be reconciled with their obtaining student credit, and whether the potential variability of student salaries might become an issue. Professor Dickinson responded by saying that while the interns’ salary was not defined in the proposal, it was expected to be commensurate with their status as students. The Dean added that there was precedent for Council approving program proposals that included salaried internships.

A member asked whether students would be expected to publish in this program. Professor Borodin replied that students in the existing research master’s program are not expected to publish, and therefore this was not envisioned for the proposed professional master’s program. However, students would not be prevented from publishing if they chose to.

A member asked whether students in the program could later enrol in the Ph.D. program. Professor Borodin answered that the basis for the proposed program was to distinguish itself from the research master’s program offered by the Department. Therefore, students in the proposed program would not have the same facility to enter the doctoral program. The doctoral program does enrol graduates of other master’s programs if they are considered strong enough; this could apply to students in the proposed program.

A member asked if the program was eligible for BIUs. In response, Professor Borodin said the program would be eligible for BIUs but not for NSERC funding.

As there was no further discussion, the Dean called the question.

The motion was CARRIED.

8 Closure of Degree Program: Master of Engineering in Telecommunications, M.Eng.Tel.

The program has not enrolled new students this academic year. The last M.Eng.Tel. student completed their coursework in Fall 2008 and graduated in absentia in March 2009. Vice-Dean Chris Damaren approved this proposal on behalf of the Faculty of Applied Science and Engineering Faculty Council. It will be reported to Faculty Council at its next meeting on May 27, 2009. With GEC approval, the proposal for closure will be sent for approval to the Academic Policy and Planning Committee of Governing Council, Planning and Budget Committee, Academic Board, and Governing Council.

Professor Willy Wong was present to answer questions, if any. The Dean called on Vice-Dean Cowper to present the motion.

MOTION (duly moved and seconded)
THAT Graduate Education Council approve the closure of the Master of Engineering in Telecommunications (MEngTel) degree program in the Department of Electrical and Computer Engineering, effective September 2009.
Seeing no discussion, the Dean called the question.

The motion was **CARRIED**.

### 9 Closure of Collaborative Program: Collaborative Program in Health Care, Technology and Place

Item withdrawn.

### 10 Degree Name Change: Public Health Sciences program: from Master of Health Science (M.H.Sc.) to Master of Public Health (M.P.H.)

Only the degree name and short-form (postnomial) are changing under this proposal; the program name, admission and program requirements remain the same. The proposal was approved by the Faculty of Medicine Council on April 30, 2009. Details on consultation with students and faculty, and on discussion that arose at the Faculty Council meeting, are summarized on the motion sheet. With GEC approval, the proposal will be sent to the Academic Policy and Programs Committee for approval and to Academic Board for final approval. The proposal will be sent to OCGS for approval.

Professor Jack Mandel and Professor Paul Corey were present to comment on the proposal and answer questions, if any. The Dean called on Vice-Dean Cowper to present the motion.

**MOTION (duly moved and seconded)**

**THAT** Graduate Education Council approve the proposal of the Faculty of Medicine and the Dalla Lana School of Public Health to change the name and postnomial of the Master of Health Science (MHSc) degree to Master of Public Health (MPH), in the Public Health Sciences program. The change is effective September 2009.

Professor Mandel thanked Council for the opportunity to speak and introduced Professor Paul Corey, Associate Director of Education at the Dalla Lana School of Public Health (DLSPH). Even though the DSLPH is new, a school of public health has been at U of T since 1925. From 1975 until recently, the school as such had been closed and formed a department in the Faculty of Medicine. Public Health thus has a long and rich history at U of T, and has always been thought to be one of the leading schools in the world. The field’s primary degree internationally is the Master of Public Health (M.P.H.). Recently, there has been a proliferation of public health schools across country, in universities such as Queen’s and Waterloo, and all offer the M.P.H. degree. During the DSLPH’s preliminary year, consultations with public agencies and others raised the possibility of offering the M.P.H. This was discussed with faculty, alumni and students. The School received very strong approval to change the degree name. The content of the program will stay the same. But changing the M.H.Sc. degree to M.P.H. will keep U of T in a very competitive position in public health globally.

It was asked whether students graduating from the program in September 2009 would have a choice of the M.H.Sc. or M.P.H. degree. Professor Mandel replied that, if they had enrolled before September 2009 and were graduating after September 2009, students would be given this choice, assuming approval of the proposed change. In response to another question, Professor Mandel said that alumni of the program would not be given the opportunity to change their degree.

Seeing no further discussion, the Dean called the question.

The motion was **CARRIED**.
11 Assignment of Hood: Public Health Sciences program: Master of Public Health (M.P.H.) degree

SGS consulted on this proposal with the Governing Council Secretariat and with Graduate Chairs of units whose programs offer the M.H.Sc. degree. No objections were raised to the M.P.H. and M.H.Sc. degrees sharing the same hood. With GEC approval the proposal will be sent to the Academic Policy and Programs Committee for approval, and to Academic Board for final approval. This proposal follows on the previous agenda item renaming the Master of Health Science (MHSc) degree to Master of Public Health (MPH).

The Dean called on Vice-Dean Cowper to present the motion.

MOTION (duly moved and seconded)

THAT Graduate Education Council approve the proposal to assign the use of the hood for the Master of Health Science (MHSc) degree also to the Master of Public Health (MPH) degree. The MPH degree is offered by the Public Health Sciences program beginning in September 2009. The use of the hood will commence with the November 2009 Convocation, pending final approvals of the new degree name.

No discussion arose; the Dean called the question.

The motion was CARRIED.

12 Program Requirement Changes:

12.1 Biochemistry, M.Sc., Ph.D.

The proposal was approved by the Biochemistry Departmental meeting on February 13, 2009. It was approved by the Faculty of Medicine Council on April 30, 2009. Details of discussion are summarized on the motion sheet. GEC approval is final.

The Dean called on Vice-Dean Cowper to present the motion.

MOTION (duly moved and seconded)

THAT Graduate Education Council approve the proposal of the Faculty of Medicine, Department of Biochemistry, to change the program requirements of the Biochemistry program as follows:

- for both MSc and PhD students, add a choice to the required course allowing them to take the existing course BCH 2021H “Selected Topics in Biochemistry” or the new course BCH 2024H “Focused Topics in Biochemistry”
- allow PhD students to count both BCH 2021H and BCH 2024H toward their total required courses

The overall number of courses required is not changing. This change is effective September 2009.

Seeing no discussion, the Dean called the question.
The motion was CARRIED.

12.2 Occupational Science and Occupational Therapy, M.Sc.O.T.

This proposal brings the program requirements in line with current practice. The proposal was approved by the Departmental Affairs Committee on August 16, 2007 and by the Graduate Curriculum Committee on October 3, 2007. It was approved by the Faculty of Medicine Council on April 30, 2009; it was confirmed at the meeting that students currently in the program are already taking OCT 1100H and will be able to fulfill the new requirement. GEC approval is final.

Professor Bonnie Kirsh was present to answer questions, if any. The Dean called on Vice-Dean Cowper to present the motion.

MOTION (duly moved and seconded)
THAT Graduate Education Council approve the proposal of the Faculty of Medicine to change the program requirements of the Occupational Science and Occupational Therapy program to add the course OCT 1100H “Applied Skills and Technology: Human Factors and Design in Occupational Therapy” as a required course for the Master of Science in Occupational Therapy degree. As a result, the overall number of required courses is increasing from 17.5 FCE to 18 FCE. This change is effective retroactively as an exceptional matter to September 2008.

The Dean called the question, as there was no discussion.

The motion is CARRIED.

12.3 Rehabilitation Science (Practice Science field), Ph.D.

The proposal was approved by the Graduate Affairs and Appointments Committee on March 10, 2009; this committee has student representation from the Graduate Department of Rehabilitation Science. It was approved by the Faculty of Medicine Council at its meeting on April 30, 2009; no discussion arose at the meeting. GEC approval is final.

Professor Heather Carnahan was present to answer any questions. The Dean called on Vice-Dean Cowper to present the motion.

MOTION (duly moved and seconded)
THAT Graduate Education Council approve the proposal of the Faculty of Medicine, Graduate Department of Rehabilitation Science, to change the program requirements of the PhD in Rehabilitation Science to no longer require that students in the Practice Science field take an additional 0.5 elective FCE. This reduces the overall number of required FCEs from 4.0 to 3.5 for students in this field only. This change is effective September 2009.

As there was no discussion, the Dean called the question.

The motion was CARRIED.

13 Other Business

A member reported her Department having encountered a problem with students including faculty on their Program Advisory Committees who should not have been permitted because they had only been granted a restricted membership (e.g. who are only allowed to sit on specific students’
committees). These restricted faculty members should not have had voting privileges or ability to supervise, but students had been under the impression that they did. Departments can list faculty as having restricted status in their materials, but this does not seem to be captured in the SGS Calendar, where they are simply listed as members, and it might pass unnoticed in other Departments. The member wondered how widespread this problem was and what steps SGS could take towards it.

The Dean thanked the member for bringing up the issue. Vice-Dean Cowper explained the different categories of graduate faculty membership: (1) Full Membership (who can perform all duties), (2) Emeritus Membership (Graduate Chairs assign duties), and (3) Associate Membership (who cannot serve as sole or major supervisor of doctoral students nor act as chair of final oral exams), and Associate Members whose duties are further restricted. Membership can be continuing, in which case it is entered in the University’s Human Resources Information System (HRIS) as ending in the year 9999, or it can have a limited term, in which case a particular end date is entered.

Vice-Dean Cowper said that in years prior to 2008-09, the faculty listing in the SGS Calendar was not derived from HRIS but was derived from department information. SGS Calendar data is now derived from HRIS; this solves the problem of the data being official, but raises two questions. The first issue is the validity of the data in HRIS - if there is a problem with incorrect information in the current Calendar listing, the source of the problem is the HRIS data. Each unit is responsible for ensuring accurate data entry in HRIS. The second issue is whether Associate Members who have restricted duties should be listed in the SGS Calendar. The HRIS system allows restricted status to be noted, or not, but without any details. Thus there are limits as to what SGS can do with respect to the Calendar listings.

Vice-Dean Cowper noted that, in some cases, graduate students may be supervised by Graduate Faculty with Full Membership, outside the student’s home department. SGS strongly encourages graduate units to exercise caution in allowing faculty from other units to supervise their students, but SGS is not monitoring this. A member noted that students are not always aware of the nuances around who should be allowed to supervise them, and asked what the best guidance for them would be. The Dean noted that the materials produced by each graduate unit should be the most accurate resource for students, since each unit best knows what its practices are around supervision of its students.

14 For Information:

14.1 Graduate Education Council: Spring 2009 Election Report
Four seats remain vacant following the Spring 2009 election. A by-election will be held in Fall 2009 to fill vacant seats. The Dean thanked the elections committee members.

14.2 Mathematical Finance, M.M.F.: Administrative Transfer of Program from SGS to the Faculty of Arts and Science
Faculty, staff and students have been duly advised of the impending administrative transfer. The transfer will not have an impact on the delivery of the program. More details are on the information sheet distributed with the Agenda.

Adjournment
The Dean presented a gift to each member completing service on Graduate Education Council effective June 30, 2009 and thanked each of them on behalf of Council.
The Dean also expressed sincere thanks to all members continuing as well as those stepping down. She expressed her view that Council had worked wonderfully well this year and she thanked them for the good discussions on important matters.
On behalf of Council, Vice-Dean Smith thanked the Dean for the careful and eloquent way she had managed Council and thanked Professor Cowper for the beautiful way she had managed the many motions that had come before Council during her time as Vice-Dean.

The Dean noted that the next meeting of Council would be held in October 2009.

The meeting adjourned at 4:25 p.m.

Jane Alderdice, Secretary        June 22, 2009
Appendix to the Minutes

UNIVERSITY OF TORONTO
Record of Attendance
GRADUATE EDUCATION COUNCIL
May 19, 2009, 3:00 p.m., in the Council Chamber, Galbraith Building

Present (Voting & Non-voting Members)

Pfeiffer, Susan (Chair)
Bondy, Susan
Brubaker, Markus
Cowper, Elizabeth
Damaren, Chris
Davis, Karen
Duff, Wendy
Goring, Daphne
Grenier, Jason
Julian, Stephen
Klinger, Christopher
Liu, Hugh
Mai, Jens-Erik
Makarovska, Vesna
Martin, Peter
McKenzie, Christine
Radmacher, Kimberley
Roach, Lisa
Rupp, Stephen
Smith, Berry
Surendra, Harinee
Sztainbok, Iliana
Wilson, Adele

In Attendance (Guests & SGS Staff)

Borodin, Allan
Carnahan, Heather
Corey, Paul
Dickinson, Sven
Francisco, Jennifer
Godwin, Michael
Kirsh, Bonnie
Mandel, Jack
Rutchinski, Steve
Wong, Willy
Yee, Lily

Absent

Baum, Joel
Elliott, Robin
Hirst, Graeme
Johnston, Gregory
Parizeau, Katherine
Weedmark, Julie

Alderdice, Jane (Secretary to Council)
Anil Purandaré (Assistant to Secretary)