Chabot-Las Positas Community College District **AP 3775**
Administrative Procedure

General Institution

FOR DISCUSSION ONLY – WORKING DRAFT

AP 3775 RESPONSIBLE USE OF ARTIFICIAL INTELLIGENCE

Reference(s):

Education Code Sections 70902(b)(7), 76200 et seq., and 87359.2;
Title 5 Sections 51023.5, 51023.7, 53200 et seq., 55204, 56000 et seq., and 59300 et seq.;
California Constitution, Article I, Section 1;
Government Code Sections 11135 and 12940 et seq.;
Family Educational Rights and Privacy Act, 20 U.S.C. Section 1232g and 34 C.F.R. Part 99;
Section 504 of the Rehabilitation Act, 29 U.S.C. Section 794;
Americans with Disabilities Act, Title II, 42 U.S.C. Sections 12131 et seq. and 28 C.F.R. Part 35; 17 U.S.C. Sections 101 et seq.

Applicable negotiated provisions: Faculty Association collective bargaining agreement, including Articles 1A.1, 4J, 4M, 9B, 9R, 10A–10B, 19, 23B, 27, and 29;

Related system guidance: California Community Colleges Chancellor's Office HUMANS principles and memoranda ISTI 25-300-01, ISTI 25-300-02, and ESS 26-52. Guidance informs this procedure; statutory requirements and District procedural choices remain distinct. Links and District cross-references appear at the end.

Purpose and Scope

This procedure implements BP 3775 by establishing how District-related AI uses are evaluated, authorized, supported, and reviewed. When AI is used, it shall augment, not replace, appropriate human expertise, relationships, and responsibility. Qualified people shall retain decision-making authority and accountability.

It applies to instruction, student services, employment, administration, research, communications, and operations at Chabot College, Las Positas College, and district Services. It covers standalone tools, AI embedded in existing software, generative and agentic systems, and AI capabilities developed internally or obtained from third parties. Applications created with AI shall meet the same deployment requirements as other district applications.

Employees and others acting for the district shall follow the approval requirements below. The sponsoring employee or unit is responsible for obtaining required approvals for institutionally provided or required tools. Institutional tool-approval requirements do not

apply to a student's otherwise permitted optional personal study use; applicable course, conduct, privacy, copyright, and security requirements continue to apply.

This procedure shall be administered consistently with applicable collective bargaining agreements. For faculty bargaining-unit members, Article 9R and other applicable negotiated provisions govern permitted AI uses, restrictions, and employment rights. Administrative approvals and implementation materials shall not amend or waive those provisions.

Definitions:

AI system. A computational system that infers from inputs to generate content, predictions, recommendations, classifications, or decisions. Generative AI produces or transforms content. Agentic AI can pursue tasks through tools, connected systems, or actions on a user's behalf.

Approved use. Authorization for a defined tool, edition or environment, configuration, purpose, data, and set of users. Approval of a brand or software package does not authorize every feature or use.

Consequential decision. A decision affecting an individual's rights, access, status, employment, academic standing, or educational opportunity. Examples include eligibility, financial aid, hiring, performance evaluation, grading, discipline, and access to services.

Material contribution. AI output meaningfully informs, recommends, ranks, evaluates, or otherwise influences a consequential outcome, service, or communication. Significance depends on influence and consequences, rather than the percentage of AI-generated words or whether a human signs the result.

Use owner and data owner. The use owner is the accountable employee responsible for a system or workflow. The data owner is the District official responsible for the affected records or business function, or an authorized designee. A use owner's access to data does not itself authorize disclosure to an AI vendor.

Responsibilities and Governance
The Chancellor shall oversee implementation, designate responsible administrators, resolve cross-functional approval questions, and review this procedure through AP 2410 and AP 2510. The Chancellor may designate an advisory group to coordinate recommendations within existing governance structures. Such a group shall coordinate with, and shall not replace, the standing district–Faculty Association AI Oversight Committee required by Article 9R(e).

The Chief Technology Officer (CTO), or designee, shall coordinate technical review, maintain the approved-use register and intake process, establish security and integration conditions, and provide the required technical approval for technology-

related acquisitions. Information Technology Services (ITS) shall provide technical support and coordinate security incident response.

Use owners shall define the need, demonstrate intended benefits, consult affected users, implement controls, document approvals, monitor results, and arrange continuity or withdrawal of the service. Data owners shall determine whether the proposed information use is authorized. Purchasing and Business Services shall administer procurement and contracts through established procedures.

Academic and professional matters shall follow collegial consultation with the Academic/Faculty Senates. Matters significantly affecting classified professionals and students shall follow their established participatory governance processes. Human Resources shall coordinate applicable employee-relations and bargaining requirements. The district and Faculty Association shall establish and maintain the standing AI Oversight Committee required by Article 9R(e), with equal representation, appointments consistent with negotiated rights, and semiannual meetings. Its charge includes reviewing AI tools and academic-integrity implications; recommending district adoption and funding, committee updates, and professional development; and monitoring new software, programs, and AI implementation to protect faculty safety, privacy, workload, and intellectual property. Reviews under this procedure and recommendations on the district's AI platform strategy shall include the committee's contractual functions and appropriate constituency input. Its recommendations do not independently authorize procurement.

The Technology Coordinating Committee shall advise within its established charge. Advisory recommendations do not authorize contracts, access to protected information, or deployment. Disabled Student Programs and Services (DSPS), accessibility personnel, instructional and student-services leaders, records officials, and legal counsel shall participate when their responsibilities are implicated.

Approved Tools and Review Paths
ITS shall publish an accessible register identifying approved environments, accounts, purposes, data categories, features and connectors, restrictions, responsible owners, and review dates. Employees shall consult the register before District use. A personal subscription, free trial, supervisor's informal permission, or availability within existing software is not institutional authorization.

AI shall not serve as the final authority for a consequential decision. Unauthorized access, disclosure of protected information to unapproved services, unauthorized or deceptive impersonation, fabricated evidence, and other uses prohibited by law or district policy shall not proceed under any review path.

Review under this section addresses a tool, configuration, data use, or institutional workflow. It does not create a separate permission process for faculty pedagogical choices permitted by the agreement. Once the relevant technical and data conditions are satisfied, repeated contract-permitted uses within the approval require no new

application. New integrations, expanded data access, and materially changed workflows remain subject to applicable review. No review path authorizes a use prohibited by the agreement; Article 9R(h) is preserved as described in Section 10.

Evaluation and Approval
For capabilities or uses not already covered by a current approval, the use owner shall submit the following information before acquisition, activation, material expansion, or deployment:

- The institutional purpose, intended users, affected individuals, expected benefits, alternatives, funding, and responsible owner.
- The tool and environment; information collected, submitted, generated, or retained; vendor access and secondary uses; connections; and authority to act.
- The proposed human review, accessibility and equitable-access arrangements, notice, correction routes, training, evaluation measures, and continuity or exit plan.

ITS shall coordinate review proportional to risk. Reviewers shall assess fitness for the intended use, material errors and bias, privacy, cybersecurity, accessibility, records, intellectual property, workforce effects, and environmental and resource impacts. Evidence may include vendor documentation, security questionnaires, accessibility conformance reports, relevant independent assessments, and testing. A vendor assertion or certification alone does not establish approval.

Purchasing shall confirm that agreements address the authorized purpose and data, access and subcontractors, security, incident notification, retention and deletion, return or export of district records, accessibility, and material changes to terms or service. Nonpublic District information shall not be used for vendor model training or unrelated purposes unless separately authorized by the responsible data owner and CTO, with legal review where needed and all required permissions. Employees shall not accept institutional contract terms without delegated authority.

Enhanced-review proposals shall undergo a limited pilot with written success measures, prohibited actions, human escalation, stop conditions, and a plan to reverse or correct errors. Test with synthetic or appropriately authorized data in an isolated environment when feasible. Legal counsel shall review unresolved legal questions and uses presenting significant legal exposure. Required consultation and bargaining shall occur before implementation of affected changes. Faculty experimental assignments and associated workload arrangements shall follow Article 10B and other applicable negotiated provisions.

Approval shall identify the owner, authorized use and data, conditions, human decision authority, monitoring, and next review date. Denials or conditional approvals shall explain the material concerns and available next steps. Vendor, model, configuration, or workflow changes that materially alter data access, action authority, intended use, or

risk shall receive renewed review; routine maintenance within approved conditions does not require a new application.

Information Protection and System Security

Approval shall be specific to the information involved. Employees and others acting for the district shall apply the rules below. Students shall follow the conditions of district-provided tools and protect information they are not authorized to disclose. Optional personal study remains subject to Section 1.

Faculty shall take every precaution to protect student anonymity when using AI, as required by Article 9R(i). Tool or data approval does not waive that obligation. Public or synthetic information may be used only within the applicable approval conditions. Copyright, licensing, and other restrictions continue to apply to publicly available material.

Nonpublic business information may be entered only into an approved environment authorized for that category and purpose. Personal accounts shall not receive nonpublic district information.

Student education records, personnel and applicant information, financial account data, accommodation or health information, investigations, privileged material, and other protected information require explicit authorization for the specific system, data, and use. Approval shall establish the lawful basis for access or disclosure and the required safeguards, including FERPA conditions where applicable.

Passwords, private keys, authentication tokens, and similar secrets shall not be placed in prompts or uploaded files. ITS shall manage any necessary credentials through approved secure methods.

Users shall submit only information needed for the approved task. Removing names alone does not establish that information is sufficiently de-identified; data owners shall assess remaining identification risks before disclosure.

ITS shall require appropriate authentication, access limited to authorized tasks, secure configuration, monitoring, and removal of access when no longer needed. Employees shall not grant tenant-wide consent, administrator rights, mailbox or file access, or connections to district systems without ITS authorization. Workshops and demonstrations shall use approved environments and synthetic or appropriately authorized materials; participation does not authorize a connection to live district systems. Monitoring and access involving faculty shall also comply with the negotiated protections identified in Section 14.

Meeting recording, transcription, or summarization shall receive the required approval, notice, and consent before capture. Restricted meetings and information shall follow applicable confidentiality requirements. AI-generated applications, scripts, and integrations shall undergo the security, accessibility, testing, and change-management review required for their actual function and data access before deployment.

The responsible unit shall verify that institutional AI services are appropriate for dual-enrollment students and other minors, including applicable age, consent, privacy, and accessibility requirements. Employees shall not direct students to bypass a vendor's eligibility restrictions.

Agentic Systems and Embedded Capabilities
New AI functions in browsers, productivity suites, learning platforms, and other existing software shall be evaluated when they materially change information access or processing, decision support, or authority to act. Existing procurement approval does not automatically authorize those capabilities.

Before enabling an agent, ITS and the use owner shall document the allowed tasks, data, systems, actions, and responsible human. Permissions shall be limited to what the task requires. Testing shall examine attempts to redirect the agent through untrusted content, unauthorized information access, and actions outside its scope.

Consequential actions shall require approval by an authorized human before execution. Any delegation of routine automated actions shall be bounded, tested, documented, and revocable. The system shall support appropriate activity logs, human intervention, suspension of access, and correction or rollback. An agent shall not inherit unrestricted administrative authority or expand its own permissions.

Human Accountability and Verification
A qualified human shall retain final authority for consequential decisions. Review shall be performed by someone with relevant competence, access to the underlying information, adequate time, and authority to reject, correct, or stop the recommendation. Confirmation of an AI result without meaningful evaluation does not satisfy this requirement.

Before adopting, submitting, communicating, or acting on AI-assisted work, users shall verify material facts, calculations, sources, and citations; consider omissions, bias, accessibility, and context; and correct errors. The extent of review shall reflect the consequences of error.

For consequential decisions, the responsible office shall retain an appropriate record of the relevant inputs and recommendations, the human assessment, the final decision and reasons, and the applicable review route, subject to established records requirements. Human approval does not remove a required AI disclosure.

Use owners shall make existing complaint, grievance, accommodation, and appeal routes available to affected individuals and arrange correction of material errors. Employees shall seek assistance or refrain from uses they cannot responsibly evaluate. The District's responsibility to provide training and support and the individual's responsibility for work both apply.

Notice and Disclosure

Notice shall be understandable, accessible, and proportionate to the effect on the recipient. Disclosures shall identify AI's role without revealing protected information or confidential accommodation details. Legal limits on disclosure shall be handled through the responsible official and, when needed, counsel.

For faculty, Article 9R(f) requires citation of AI-created material incorporated into their work, including quotations, images, data, and paraphrased content, and an acknowledgment of other AI assistance such as translation, editing, or outlining. These duties apply even when a use does not meet this procedure's general material-contribution threshold. Faculty shall verify accuracy, educational relevance, and alignment with academic standards and course outcomes. The negotiated provision in Article 9R(h) remains as stated in Section 10.

Teaching, Learning, and Academic Integrity
Within applicable law, collective bargaining agreements, Board policy, and approved institutional safeguards, faculty shall determine course and assignment expectations consistent with academic freedom, disciplinary standards, and established collegial consultation. Faculty determine classroom AI plagiarism policies under Articles 9R(j) and 9B.1(k). This procedure does not require faculty to adopt AI in instruction or permit student AI use; accommodation requests remain subject to Section 11. Syllabi and assignment instructions shall clearly explain permitted, limited, required, or prohibited AI uses and associated attribution requirements before students are evaluated under them.

Institutional safeguards govern approved tools, data, privacy, security, and accessibility. Faculty retain responsibility for learning design and valid evidence of student achievement within those safeguards and the agreement. Faculty use of AI shall comply with Article 9R, including the following negotiated permissions and restrictions, subject to the provision for AI-related courses in Article 9R(h) described below:

Assessment development. Faculty may use AI to develop only a limited part of an assessment; AI shall not generate the entire assessment. Faculty shall review and edit AI-assisted content and ensure its academic integrity, appropriateness, and alignment with course learning outcomes (Article 9R(c)).

Grading. AI may assist with grading objective assessments, such as multiple-choice and true-or-false items. Faculty remain solely responsible for the accuracy, fairness, and integrity of grades. AI shall not grade subjective assignments, including essays, written responses, critical reasoning, and the upper five levels of Bloom's Taxonomy (Article 9R(d)). Human review or administrative approval does not independently authorize a prohibited grading use.

Faculty responsibility and workload. Faculty retain sole responsibility for the accuracy, appropriateness, academic integrity, and course-outcome alignment of instructional materials, assessments, and graded work, with or without AI assistance (Article 9R(g)). The protections in Article 9R(b) apply to instruction, counseling, library

services, and other faculty duties, including its restrictions on primary delivery, delegation, or substitution of faculty work by AI or autonomous systems and its protection against displacement of unit-member workload due to large language model AI.

Courses on or related to AI. Article 9R(h) preserves, notwithstanding the other provisions of Article 9R, appropriate faculty use of AI tools and technologies in developing and delivering instruction in courses on or related to AI to enhance their effectiveness as educators and scholars. That negotiated provision is preserved according to its terms. This procedure and its implementation materials shall neither broaden nor narrow it. Disagreements about its application shall follow existing District–Faculty Association processes.

Consistent with Education Code Section 87359.2, the instructor of record and other positions covered by that section shall be held by persons who satisfy applicable qualifications. AI may assist authorized work but shall not serve as the instructor of record or substitute for the qualified person in a covered position. Required instructor interaction and instructional responsibilities shall continue to be met; AI-agent interaction shall not be presumed to satisfy distance-education interaction requirements.

Distance-education course management, assessment, communications, and submissions shall continue to comply with Article 19A, including its requirements for the district-approved learning management system or district email. Approval of an AI tool does not authorize an alternative official course-management or assessment channel.

Faculty and student work, research, instructional materials, and AI-assisted outputs shall be handled consistently with BP 3715, Articles 19B and 27 of the Faculty Association agreement, and applicable copyright, licensing, and contract requirements. Uploading another person's work or authorizing its use for model training requires appropriate authority. Reusable training materials shall respect faculty ownership and required permissions; faculty course content shall not be made available to others without the faculty member's authorization as required by the agreement. This procedure does not transfer ownership or expand authority to license intellectual property.

Equitable Access and Accommodations

Before requiring an AI tool for instruction or a district service, the sponsoring unit shall establish an approved, accessible means of participation and address cost, devices, language, digital literacy, and privacy. Required participation shall not depend on an employee or student purchasing a personal AI subscription or using an unapproved consumer service. Necessary institutional access or an appropriate alternative shall be arranged before the requirement begins.

Accessibility review shall follow AP 3725 and AP 6365 and applicable district standards. Review shall consider actual functionality and user experience in addition to vendor documentation. Alternatives shall be timely and equally effective where required.

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Student-facing services shall be assessed for educational or service quality, with a tested route to qualified human assistance; availability alone does not establish effectiveness.

Student requests to use AI as an accommodation shall follow AP 5140 and the established DSPS process for individualized and timely review, including interim decisions when appropriate. DSPS shall coordinate with faculty and relevant accessibility and technology personnel to address individual needs, essential academic requirements, and appropriate safeguards. Neither an automatic entitlement to a particular tool nor a blanket refusal shall substitute for that process.

AI Literacy and Professional Development

The Chancellor shall designate a senior administrator to coordinate a districtwide AI professional-development plan with both colleges, District Services, ITS, the standing District–Faculty Association AI Oversight Committee, and the appropriate professional-development and governance bodies. The plan shall preserve college Professional Development Committee authority over professional-development funds and the Academic Senate and College President roles in Flex programming under Article 29. The district shall provide equitable access to role-appropriate guidance and practical training for faculty, classified professionals, administrators, and students.

Instructional AI professional development under Article 9R(a) shall be voluntary. It shall support pedagogically sound, ethical, and constructive uses, including learning activities, academic integrity, understanding AI detection tools, and exploration of student-facing applications across instructional modalities. Existing Flex obligations and compensation provisions remain governed by Article 29; this procedure does not create a faculty requirement to adopt instructional AI.

For employees outside the faculty bargaining unit, training necessary for a particular system, data access, or consequential workflow shall be completed before that use is authorized, consistent with applicable agreements. Any mandatory faculty security, privacy, or system-access training shall rest on applicable law or negotiated authority and shall not convert the voluntary instructional AI professional development in Article 9R(a) into compulsory participation. Employee workload, compensation, and release-time arrangements shall follow applicable agreements and processes. Users shall have an accessible way to obtain guidance when uncertainty arises.

The plan shall develop internal trainers across both colleges and District Services and identify recurring resources for their continuing development and time for peer coaching. Training shall include hands-on practice tailored to disciplines and employee roles, opportunities to refresh skills, and accessible peer assistance.

The plan shall include recurring opportunities to hear from students, faculty, and other employees about needs, experiences, and concerns. The responsible lead shall communicate how that input informs training and recommendations. Evaluation shall consider demonstrated judgment, error detection, quality of work or learning, and

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support needs, alongside participation data. Program assessment shall improve training and support and shall not create new faculty employment-evaluation criteria or procedures.

Workforce, Environmental, and Resource Impacts
Use owners shall identify material effects on employee duties, workload, evaluation, staffing, and training needs before implementation. Human Resources and the responsible administrator shall complete applicable consultation and bargaining. Efficiency projections shall account for verification, correction, supervision, and support time. AI adoption does not itself authorize changes to negotiated terms or established employee rights. For faculty, this includes the specific workload protection in Article 9R(b).

For significant acquisitions, deployments, and renewals, the review shall consider environmental and resource impacts in proportion to scale, potential benefits, and risks, consistent with AP 3580. Consider reasonably available information about energy and water use, equipment and waste, community impacts, recurring cost, staff support, and alternatives that can meet the institutional need.

The use owner and appropriate reviewers shall document material tradeoffs and limitations in available evidence. Unavailable vendor information shall not be represented as evidence of no impact. Evaluation may address a system or recurring workflow; a separate environmental study is not required for each routine interaction. Procurement and implementation choices shall seek to avoid unnecessary duplication and waste while meeting educational and operational needs.

Monitoring, Incidents, and Correction
Each approved deployment shall have measures appropriate to its purpose and risk. Use owners shall monitor accuracy, errors, bias, accessibility, complaints, human escalation, workload, cost, and intended educational or operational outcomes. Enhanced-review uses shall be reviewed at least annually and sooner after material changes, significant errors, or incidents. Other review intervals shall be specified in the approval.

Monitoring, logs, investigations, and access to faculty communications or computer files shall comply with Article 23B, including its consent requirements, limited exceptions, authorization, notification, and limits on scope and duration. Nonemergency access without consent shall require the advance written, nondelegable authorization specified in Article 23B.3; the written rationale shall be provided to the affected faculty member and Faculty Association within two workdays of access. Entry into distance-education courses and use of information for faculty evaluation or discipline shall follow Article 19C.2 and applicable negotiated procedures. This procedure does not expand ITS access authority or establish a separate faculty evaluation system.

Users shall promptly report suspected unauthorized disclosure, unsafe behavior, discriminatory outcomes, or material inaccuracies through the applicable ITS and

functional reporting channels. Reports shall identify the affected tool, use, and available facts without unnecessarily reproducing sensitive information. The responsible office shall preserve necessary evidence in an approved location and correct affected records or communications as appropriate.

ITS may suspend access or integrations to contain an immediate security risk under existing authority and shall promptly notify the responsible administrator. Functional administrators may suspend affected workflows within their authority. The responsible officials shall coordinate privacy, accessibility, employee, student, or legal responses and any required notices. Restoration shall require confirmation that the material problem has been addressed and approval conditions can be met.

A complaint about AI use shall be directed to the existing process appropriate to the issue. Good-faith reporting and requests for review shall not be used as grounds for retaliation. Alleged misconduct shall be handled through applicable established procedures, agreements, and due-process protections; this procedure creates no separate disciplinary schedule.

Records and Public Information
AI-related records shall be classified, retained, protected, and disposed of under AP 3310 and applicable requirements. This includes approvals, assessments, decision records, and prompts, outputs, or activity logs when their content or purpose makes them District records. A universal requirement to retain every exploratory prompt is not created.

Records officials shall determine retention requirements; ITS shall configure systems to support those requirements, authorized access, and applicable preservation holds. Users shall preserve relevant material when required and shall not rely on a vendor's default chat history as the district's recordkeeping system. Sensitive information shall not be duplicated into unnecessary archives.

Requests for public records shall follow AP 3300. Student-record access and correction shall follow AP 5040 and AP 5045 as applicable. The use of AI, a vendor confidentiality label, or a personal account does not by itself determine whether a record must be retained, protected, or disclosed.

District Cross-References: *BP 3775 Responsible Use of Artificial Intelligence; BP/AP 2410 Board Policy and Administrative Procedure; BP/AP 2510 Participation in District and College Governance; BP/AP 3050 Institutional Code of Ethics; BP/AP 3300 Public Records; BP/AP 3310 Records Retention and Destruction; BP/AP 3410 Nondiscrimination; AP 3435 Discrimination and Harassment Complaint Procedures; BP/AP 3580 Sustainability; BP 3715 Intellectual Property; BP/AP 3720 Computer and Network Use; BP/AP 3725 Information and Communications Technology Accessibility and Acceptable Use; BP 4030 Academic Freedom; BP/AP 5040 Student Records, Directory Information, and Privacy; AP 5045 Student Records — Challenging Content and Access Log; BP/AP 5140 Disabled Student Programs and Services; BP 5500*

Standards of Student Conduct; AP 5520 Student Discipline Procedures; BP/AP 5530 Student Rights and Grievances; AP 6330 Purchasing; AP 6360 Contracts — Electronic Systems and Materials; and AP 6365 Contracts — Accessibility of Information Technology. Faculty Association collective bargaining agreement, including Articles 1A.1, 4J, 4M, 9B, 9R, 10, 14, 15, 18, 19, 23B, 27, and 29.

Source Links for Consultation

These sources support review of this working draft. Review paths, owner assignments, the detector safeguard, and annual reporting are proposed local procedural choices. Faculty provisions shall be implemented consistently with the collective bargaining agreement. Review comments identify the contractual provisions and selected meeting passages informing the revisions.

CLPCCD policy and procedure index

AP 2410 Board Policy and Administrative Procedure

AP 2510 Participation in District and College Governance

CLPCCD Purchasing and Warehouse Services Guide

AP 3580 Sustainability

Education Code Section 87359.2

California Senate committee analysis confirming AB 2370 and SB 241 requirements

U.S. Department of Education guidance on online tools and FERPA

CCCCO HUMANS principles

CCCCO ISTI 25-300-01 Developing AI Literacy — February 20, 2026

CCCCO ISTI 25-300-02 AI Safety and Security — May 14, 2026

CCCCO ESS 26-52 AI in Teaching and Learning — August 3, 2026

Faculty Association Agreement 2025–2028 including Article 9R

Adopted:
Board Reviewed:

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