



320 STEPHENS HALL
UNIVERSITY OF CALIFORNIA

March 30, 2011

CATHERINE KOSHLAND

Vice Provost – Teaching, Learning, Academic Planning and Facilities

Subject: Online evaluation of courses and teaching

Dear Cathy,

On March 14, 2011 and March 28, 2011, Divisional Council (DIVCO) discussed the draft document, *Online course evaluation: access to evaluation data, context & recommendations*, informed by the comments of the committees on Budget and Interdepartmental Relations (BIR) and Educational Policy (CEP). DIVCO endorsed the committee comments, which are appended in their entirety. We also discussed the subject more broadly on March 14, 2011 with University Registrar Anne De Luca, in her capacity as the initiative manager for the Operational Excellence Student Services Initiative, since funding for online evaluation of courses has been requested under this OE initiative.

The discussion in DIVCO revealed serious concerns about the direction of this project. The title of the project itself is confusing in two ways. First, for faculty who have spent considerable time discussing online instruction, the project sounds like an evaluation of online instruction, rather than online evaluation of face-to-face instruction. Second, the title indicates that the project focuses exclusively on courses. In fact, however, the document that we were asked to review discusses the access to data relating to instructors. The OE proposal makes specific reference to the recommendations of the 2009 Joint Senate-Administration Task Force on Teaching Evaluation. We emphasize that the evaluation of courses - asking students about the quality of a course and how to improve it - is not the same as the evaluation of teaching - which serves to guide a faculty member in professional growth and provide input for academic personnel reviews. Hence, DIVCO echoes the principles articulated by BIR in its comments:

First, we believe that the sole purpose of collecting student evaluations is to preserve and enhance the quality of instruction on campus. Student evaluations serve this end by providing feedback on instruction to teachers as well as campus reviewers.

Second, we believe that any decision about course evaluations must weigh the welfare of faculty as well as of students. We do not see evidence of this commitment to faculty welfare in the proposal under consideration.

DIVCO noted that the proposal presents no pedagogical rationale for its recommendations on access to data. Amplifying the committee comments, DIVCO identifies the following concerns.

Response rate

DIVCO is concerned that absent incentives for students to complete course evaluations online, response rates will be too low to be meaningful and representative. We are concerned that low response rates will skew evaluation findings. Given that the data collected will be included in merit and promotion cases, we strongly agreed with BIR that a threshold be established for response rates, below which data will be deemed to be insufficiently representative for academic personnel purposes. The consensus was that this threshold should be 75%. DIVCO believes that if academic personnel decisions were to be made on the basis of less complete data, the University would be vulnerable to legal challenges to some of these decisions. While this minimum is close to the 70% “larger goal” for responses identified in the proposal posted on the OE website, we feel that a high response rate is **necessary** for reliable personnel reviews, and should not be just viewed as a **goal** toward which we should work.

Furthermore, providing students with access to incomplete data would be misleading, unhelpful to them and potentially damaging to faculty. Although DIVCO recognizes that there are commercial websites that are already doing this, we believe that an official University website must adhere to the same standards of rigor and excellence that characterize our teaching and research, and that the public and our students expect of us.

Student to student questions

Collecting and releasing qualitative data from student respondents also raised concerns. Again, the proposal lacks any discussion of the pedagogical merits of collecting “student-to-student” evaluation data. We agreed with BIR’s assessment:

While the majority of student comments on course instructors are germane and responsible, a minority are inappropriate, derogatory, or grossly inaccurate. Public dissemination of student comments might encourage such inappropriate remarks, particularly as retaliation for low grades.

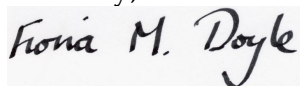
Accordingly, we recommend that the sponsors of this proposal articulate what measures will be instituted to protect faculty against potentially libelous, and other inappropriate comments.

Implementation and next steps

Neither DIVCO nor the reporting committees opposes online evaluation of courses and teaching. We acknowledge that evaluation practices are uneven across campus, and that there is room for improvement. We have heard very positive comments from colleagues who participated in the focus groups convened to consider questions that might be asked in online evaluations. We are concerned, however, about the speed at which this project appears to be proceeding and that the current proposal does not meet our expectations for excellence at Berkeley. Although one of the mission statements of OE on organizational performance is "Clear decision making roles and accountabilities," the proposal does not identify who is accountable for shortcomings in the proposed online evaluation system, or what strategies would be adopted should shortcomings emerge. Given the centrality of the academic personnel review process to Berkeley's excellence, these issues must be resolved.

We recommend that this project be postponed until the identified concerns have been adequately addressed. We then propose that a pilot be conducted. We did note that pilots for past campus systems were not always sufficiently representative, or of adequate duration to reveal issues and concerns. Thus we recommend taking steps to ensure that the pilot is representative of departments of differing disciplines, size, and resources, and allows for direct comparison of data acquired by the proposed online process with data acquired by the traditional, paper-based approach, followed by thoughtful analysis of the data before scaling up campus-wide. This side-by-side comparison will provide the best possible way to evaluate the new on-line system, and will also ensure the integrity of the academic personnel review process for individuals who are part of the pilot. The latter provision is likely to increase the number of faculty willing to participate in the pilots.

Sincerely,



Fiona M. Doyle
Chair, Berkeley Division of the Academic Senate
Professor of Materials Science and Engineering

Cc: Jeffrey Knapp, Chair, Committee on Budget and Interdepartmental Relations
Thomas Goldstein, Chair, Committee on Educational Policy
Mary Graham, Acting Manager, Committee on Budget and Interdepartmental Relations
Elizabeth Wiley, Senate Analyst, Committee on Educational Policy
Cynthia Schrager, Assistant Vice Provost

Encls.

March 1, 2011

CHAIR FIONA DOYLE
ACADEMIC SENATE, BERKELEY DIVISION

Re: Access to Online Course Evaluation Data

We write in response to a request for comments on the proposed "Access to Evaluation Data: Context and Recommendations" issued by the online course evaluation steering committee. At the outset, we wish to stress two basic principles that guide our response.

First, we believe that the sole purpose of collecting student evaluations is to preserve and enhance the quality of instruction on campus. Student evaluations serve this end by providing feedback on instruction to teachers as well as campus reviewers. If we are right that the essential aim of collecting evaluations is pedagogical, then, we believe, it is incumbent on those who recommend the public release of evaluations to explain the *pedagogical* value of making the evaluations public. We are deeply troubled that the proposers appear to place the expediency of helping students shop for courses over the pedagogical goals of a great university. We predict that the public release of student evaluations will in fact *undermine* the quality of instruction at Berkeley, in particular by making it more likely that faculty will feel pressured to teach *for* the evaluations, not for pedagogical ends.

Second, we believe that any decision about course evaluations must weigh the welfare of faculty as well as of students. We do not see evidence of this commitment to faculty welfare in the proposal under consideration.

It is true, as the proposal emphasizes, that many decisions about access are effectively dictated by relevant federal and state laws. In particular, California law, as explained in the proposal, might seem to require that almost all course evaluation data collected by the University must be made publicly available.

With regard to these apparent legal requirements, we wish to make three points. First, the law is not settled, and therefore the Senate should urge the University to defend vigorously the confidentiality of information that is best kept confidential. Second, the Senate should encourage the University administration to lobby for changes in aspects of the relevant law that could be especially harmful to our pedagogical mission or to faculty welfare. Third, we note the

legal principle that the University does not have to reveal data that it does not collect.

We were surprised that those who drafted this proposal did not seek out precedents that might allow us and others to better understand the legal risks. Given that three UC campuses already employ online evaluations, it would have been useful to know what their policies are with respect to making data public and what, if any, legal challenges or issues they have encountered. We recommend that both questions be answered before any commitments to data release are made at Berkeley.

In regard to the recommended policy on the release of quantitative data in particular, we wish to make two points.

First, we strongly object to the proposal to make grade distributions for each course publicly available. We find it hard to conceive how this policy could have any other effect than to pressure faculty to inflate their grades and thus lower their standards. Again, it is incumbent on the proposers to explain the *pedagogical* value of releasing data on grades. We further note that privacy experts are often concerned about releasing information regarding distributions in situations where small numbers are involved, because these small numbers might permit people to infer data about individuals; hence, with respect to small-enrollment courses, a practice of releasing grade distributions might well violate the privacy protections set forth in FERPA.

Second, a basic principle of assessing quantitative data on courses is that the data must be understood in appropriate intellectual and disciplinary contexts. The University's release of raw, uncontextualized data would constitute an abdication of the University's professional responsibility to exercise its intellectual and disciplinary judgment in elucidating that data.

Third, at various stages in the faculty review process, quantitative data are manipulated for further analysis: for example, an evaluation score for a course might be compared to the average for all instructors teaching the same or similar courses. We believe that access to such manipulations, transformations, and analyses of the data should be limited to those who need them as part of the review process. We ask, therefore, that the recommended policy explicitly state that these analyses not be made available publicly.

We turn now to qualitative data. The recommended policy makes a distinction between a "student-to-student" qualitative question collected online, which would be made public, and other qualitative questions, which would not be made public. First, we do not find a plausible pedagogical justification for collecting student-to-student questions, let alone for disseminating them. Second, we believe that the proposed policy should outline how the University intends to preserve and defend the confidentiality of answers to qualitative questions it does not intend to make public.

While the majority of student comments on course instructors are germane and responsible, a minority are inappropriate, derogatory, or grossly inaccurate. Public dissemination of student comments might encourage such inappropriate remarks, particularly as retaliation for low grades. How would the University protect faculty against unfair and unjust accusations that might be distributed publicly? Once posted, these accusations could damage a faculty member's career and, given the nature of the Internet, could be difficult to erase from the public record. In this regard, we note that public confidence in the validity of comments that appear on a University-sponsored website will likely be higher than it would be for comments on a commercial site, such as Rate My Professor; hence, the damage that unfair and unjust comments could do to a faculty member are greater on a University-sponsored website than on a commercial site. Such observations also raise the question of how the University would protect itself against litigation if a faculty member deemed that posted comments about him or her constituted libel. We strongly believe that, at the very least, the proposed policy should set forth a process by which faculty can review *all* comments and can petition to have inappropriate, derogatory, and grossly inaccurate comments removed *prior* to their being made public.

Finally, we observe that response rates for public universities to online course evaluations are generally low. Although we can see how an online system might, in theory, save money, we are compelled to ask at what cost in terms of quality of information received?

Jeffrey Knapp
Chair

JK/mg

COMMITTEE ON EDUCATIONAL POLICY

March 9, 2011

CHAIR FIONA DOYLE
BERKELEY DIVISION OF THE ACADEMIC SENATE

Re: Recommendations on Online Course Evaluations

Dear Chair Doyle,

At its February 23 and March 9 meetings, the Committee on Educational Policy reviewed the recommendations of the campus Online Course Evaluating Steering Committee. Our committee expressed concern about the report, worrying that the process for adopting online evaluations is moving too fast, without sufficient faculty input.

CEP did unanimously endorse the steering committee's recommendation that course evaluations be shifted online. Beyond, there was little consensus on the committee regarding the steering committee's recommendations.

Without amplification, the steering committee report notes: "Discussions with faculty reveal that ensuring response rate is a key concern, but that some faculty and leaders in the Academic Senate also have concerns about course evaluation data being made public."

This isolated paragraph in which faculty doubts were raised resonated with CEP. Many members shared a concern about how the university would ensure that a sufficient and representative sample of students would participate. Moreover, some CEP members felt the issue of "openness" in the evaluation process needed much greater discussion.

Some argued it was wise—as recommended by the report—for the university to make widely available the summaries of quantitative results from the two standard campus wide questions. At least one committee member argued for complete openness on *all* quantitative results. Others noted that no matter the security precautions, outsiders would have relatively easy access to all results, noting that "screen shots" of pages can be taken and posted online. Once information is available to a small population online, it can be distributed widely.

Some committee members felt that if results to the campus wide questions were to be released, this should be done so with greater sensitivity to context. For example, some committee members endorsed the suggestion that the release of these scores be accompanied by a calculation of the average of evaluations over the number of years a professor has taught. The listing could also provide the department or college average for the same level of courses.

Still others pointed to possible differences in the usefulness of evaluation scores between lower division courses, where large numbers of students unfamiliar with the subject matter get to comment, and upper division courses, where students are more knowledgeable. These committee members suggested that somehow distinctions should be made between large lectures populated by non-majors and those courses taken by majors.

The committee was again split on the advisability of releasing open-ended comments to students. Most on the committee agreed with the steering committee that qualitative narrative results derived from open-ended questions be restricted to individual course instructors and certain qualified administrators. They favored continuing confidentiality until the campus finds out whether electronic responses introduce any significant loss of inhibition in the language students use. One committee member doubted that such information could ultimately be protected in a public institution.

Many committee members used the opportunity of assessing this document to vent their irritation about the underlying value of course evaluations. Some felt relying on students as the arbiters of teaching effectiveness was indefensible. Some committee members said they were upset that teaching effectiveness was in effect “reduced to two numbers”—the answers to the two standard campus wide questions. Others praised students as savvy consumers.

Committee members recommended that the campus at this time undertake a deeper examination of the usefulness of course evaluations.

In the view of at least one committee member, the steering committee report was fatally flawed because it tried to blend three agendas:

1. Putting evaluations online.
2. Openness in distributing the results of the evaluations.
3. Offering students something more reliable than websites such as “Rate My Professor.” (One committee member predicted that such private sites would exist no matter what Berkeley does.)

Some members of CEP felt that these agendas were imperfectly blended, and they felt they did not have sufficient information to make informed judgments on what was being proposed.

Committee members were critical of other aspects of the report. They did not understand the first sentence, and some were unclear what “student-to-student” evaluations meant.

In conclusion, the committee felt this ratification process is moving too fast, and more faculty input needs to be solicited. Committee members were aware, as the report noted, that in the area of evaluations, the “trend is moving toward openness.” Some committee members did not wish to be seen as obstructionist.

With best regards,

Tom Goldstein, Chair
Committee on Educational Policy

TG/ew