

## Responses to the comments by the Faculty in Several Faculty Meetings

1. **Concern:** Student evaluations of teaching (SETs) should not be discarded entirely.

**Our response:** We agree. SETs must play a role both summative and formative in the comprehensive evaluation of any instructor. Furthermore, it is required that we look at them for the purpose of RPT, per our University Faculty Personnel Actions document (UFPA). Before, we had no guidance as to what role they had vis a vis other factors, and the end result was that they were often the primary thing that PRCs looked at. The Report from this Task Force makes explicit what role SETs play, in the context of the ten factors that define effective teaching performance according to the UFPA document: (1) competence in the discipline, (2) ability to communicate ideas effectively, (3) versatility of teaching techniques, (4) appropriateness of teaching techniques, (5) organization of courses, (6) relevance of instruction to course objectives, (7) methods of evaluating student achievement, (8) relationship with students in class (the factor through which we advocate the SETs to play a prominent role), (9) effectiveness of student advising, and (10) other factors relating to performance as an instructor. In other words, SETs will continue to play an explicit role, as one of the many things we look at for formative and summative purposes, and in a very specific way.

It is important to understand that our proposal does not contain a change in the criteria and standards that define teaching performance: we work with the qualities that are defined in the UFPA, and that we are already expected to evaluate. What we offer is an explicit codification, informed by best practices nationwide, of how to conduct this evaluation of teaching. Further, according to our proposal any Area or department retains the right to codify the evaluation further. More on this below.

2. **Concern:** The PRC may also be biased.

**Our response:** We also agree. This is why the activity of the PRC is highly regulated by Federal and State Law, the Collective Bargaining Agreement (CBA), the UFPA, and the OCOB RPT document. These documents are very specific about what information ought to be used for the purposes of RPT, and what information must be discarded. The one item they do not provide guidance on is on how the SETs are to be specifically used. Any College can augment their methodology for how teaching is evaluated, and a meticulous methodology that requires the PRC to be explicit about how those ten factors that define teaching performance are viewed and assessed can be developed precisely to make the deliberation about teaching effectiveness as transparent as possible. It helps the next level of review understand what the PRC was looking at, and how, at the moment in which they made their recommendations. This is precisely the rationale behind the system that we developed.<sup>1</sup>

To further control for those biases our proposal includes: (i) training for the evaluators on how to use the summary and the checklist instruments before the instruments are used in any evaluation, and (ii) [a recommendation to the effect that each evaluator that visits the classroom is required to complete the summary and checklist instruments independently of the other evaluators that will visit the classroom in that evaluation cycle.](#) See the OCOB Evaluation of Teaching Task Force's Report for details.

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<sup>1</sup> For an extensive discussion of the peer review model of evaluation of teaching effectiveness see this resource: <http://cet.usc.edu/cet/wp-content/uploads/2018/09/Six-Myths-about-Peer-Review-of-Teaching.docx>

3. **Concern:** It should be required that the PRC discusses the formal evaluation of teaching with the instructor in a timely manner.

**Our response:** This is where things stand in this regard as of now, per the CBA:

15.5 At all levels of review, before recommendations are forwarded to a subsequent review level, faculty unit employees shall be given a copy of the recommendation and the written reasons therefore. The faculty unit employee may submit a rebuttal statement or response in writing and/or request a meeting be held to discuss the recommendation within ten (10) days following receipt of the recommendation. A copy of the response or rebuttal statement shall accompany the Working Personnel Action File and also be sent to all previous levels of review. This section shall not require that evaluation timelines be extended.

In the name of making this process as formative as possible, [we now recommend \(but do not require\) that the PRC holds this meeting between the instructor and one or all members of the PRC within the timeline stated in the CBA item 15.5 above](#). Any College Area or Department should feel free to make this a requirement, and we do not believe this needs to be a mandate imposed from above, especially since the instructor has the right to request the meeting, as clearly stated in the above quoted policy.

4. **Concern:** There needs to be a rule that determines how the distribution of responses in the summary instrument maps into the “1”, “2” and “3” categories in the AP-109.

**Our response:** This is the hardest concern to address. It sounds intuitively plausible that this would be a good idea. We have thought about this extensively and we are convinced that this is not the best way to proceed. In a nutshell, the reason is the following: a strict rule for how to transform the information in the summary instrument into the “1”, “2” and “3” labels could potentially be very unfair to those that land “on the fence” of any mandated threshold. It will either create incentives for the gaming of the underlying distribution of responses in the summary instrument (which destroys its informational formative value), or simply let a candidate receive a recommendation that is not sensitive to aspects of the candidate’s case that are not explicitly factored into the required thresholds.

A really good example of the problems we are describing has been extensively studied in the criminal justice system, in the context of “mandatory minimum sentencing,” which is now widely viewed by legal scholars and justices alike (and across the political spectrum) as creating more problems than it intended to solve. The overwhelming consensus around this issue is this:

“the most efficient and effective way for Congress to exercise its powers to direct sentencing policy is through the established process of the sentencing guidelines, permitting the sophistication of the guidelines structure to work, rather than through mandatory minimums.”<sup>2</sup>

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<sup>2</sup> [https://www.ussc.gov/sites/default/files/pdf/research-and-publications/research-publications/2017/20170711\\_Mand-Min.pdf](https://www.ussc.gov/sites/default/files/pdf/research-and-publications/research-publications/2017/20170711_Mand-Min.pdf), page 2.

Guidelines, rather than strict minima, is precisely what we provide, which is also an improvement over what we currently have: under the current system there aren't even guidelines, let alone a more defined rule, for how the PRC is to arrive at the "1", "2" or "3". We provide such guidance structure, without the rigidity that a specific rule would impose. One can also think of the distribution of responses arising from the summary instrument, together with the instruments themselves, as providing a rich and transparent language a PRC can use to have a conversation about teaching, both with the instructor and with the next level of review. In any case, any College Area or Department should feel free to craft the above described threshold structure, even as we would not recommend doing so, for the reasons stated above.

5. **Concern:** Multiple observations should be required in a promotional year.

**Our response:** We agree. While the current OCOB document does require all PRC members to visit the classroom in a promotional year, it does not preclude all members from visiting in the same day, which puts too much emphasis on what may transpire in a single lecture. To eliminate this problem, [we recommend that PRC members visit the instructor on different days.](#)

6. **Concern:** Instructors need to be aware of how they will be evaluated before the evaluation.

**Our response:** We agree. The mechanism would be as follows: [\(i\) The evaluator meets with the instructor, \(ii\) they jointly go over the summary and checklist instruments, and \(iii\) they jointly determine the date for the class visit, ensuring that it does not coincide with the date another evaluator will visit \(per the concern above\).](#)

7. **Concern:** This process feels onerous to the PRC members.

**Our response:** Any system that shifts attention from the consideration of a single 'canned' average of subjective opinions into a nuanced evaluation of multiple kinds of qualitative and quantitative evidence is going to be more work for a PRC. We contend that at least a version of this is what any PRC should have been doing all along, so the extra work is simply what is to be expected in a situation that requires such care as a PRT decision. Having said this, we believe this will feel like "extra work" on the first year of implementation, and will feel considerably easier after that, not unlike how new teaching preparations feel on the first year of implementation.