October 20, 2014

From: Faculty Council Executive Committee (FCEC), The University of Texas at Austin
Regarding: Student Evaluations of Faculty Teaching

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The Faculty Council Executive Committee at UT Austin welcomes the opportunity to provide feedback regarding possible changes to the use of comments from student evaluations of faculty teaching. Our consensus opinion is that the primary purpose of student comments is to help the instructor improve teaching, and posting confidential Course Instructor Survey (CIS) comments to a public forum will interfere with the comments’ primary purpose of gathering high-quality feedback about teaching. Thus, our unanimous recommendation is to leave the system of CIS in its current form. Our rationale is outlined below, followed by our answers to the three questions posed by UT System.

The CIS is an important tool allowing students to provide anonymous and confidential feedback to instructors regarding the quality of their teaching. Faculty members take this feedback seriously, using the comments to implement changes for the benefit of future students. CIS comments are fundamental to our mission of providing a first-rate education to our students. The value of the CIS results is dependent on the students’ expectations of anonymity and confidentiality.

**The purpose of Course Instructor Surveys is to gather high-quality feedback so instructors can improve course content and teaching effectiveness. Posting CIS comments to a public forum will fundamentally interfere with this process.** The FCEC at UT Austin asserts that it is inappropriate to publish written comments from the CIS. These comments are a private communication between the student and the instructor. The language, appropriateness, and personal nature of these comments vary wildly. Posting the comments publicly will change the comments’ intended audience from the instructor alone to a combination of the instructor, peer students, and the community at large. This change in the intended audience undermines the fundamental purpose of the CIS as a tool to measure an instructor’s teaching effectiveness and provide constructive feedback. Moreover, the public nature of these comments will impact the manner in which students formulate the comments. For example, all students serving on the Educational Policy Committee at UT Austin agreed they would craft their remarks differently if they knew the remarks would be viewed by an audience other than the instructor. The students said they use the comments section to make very specific remarks to professors, which may be misinterpreted by or not make sense to a wider audience that did not participate in that specific class.

Complying with FERPA requirements will be prohibitively expensive and will strip the comments of much of their value. To comply with FERPA, handwritten comments will need to be transcribed before they can be released. Further, even in electronic format, individual students may be identifiable through patterns of speech, word usage, and related anecdotes; steps will need to be taken to remove any of these identifiable aspects. These filters will require an excessive number of staff hours and will likely result in the removal of many of the substantive comments in any case.

We understand that “Feedback [the UT System Regents] have from students strongly suggest that the comments of other students are the single most helpful information that may be available to them.” Certainly feedback from peer students about courses and instructors can be valuable in selecting a particular course or instructor. However, CIS comments from UT Austin courses have never been made available to students, so the feedback referred to above is based on comments obtained from routes other than the CIS, most likely through friendship and social networks. The feedback that students share through these channels is specifically intended for their peers. This is in stark contrast to the CIS comments, which the students explicitly and intentionally direct to their instructors to provide them feedback on course content and teaching effectiveness.

In addition to the peer feedback discussed above, the UT Austin FCEC recognizes that academic advising, tightly focused degree plans, and emphasis on four-year graduation are more likely to be significant factors in students’
choices of courses.

**Questions posed by the letter from UT System**

With this discussion by way of background, we feel that the three questions are rendered moot. Nevertheless, we will provide brief comments below.

1. **What are the IT resources needed?**
   These resources could be substantial for programming and maintenance, especially if the University elected to allow access only to currently enrolled students.

2. **What are the human resources needs to comply with FERPA?**
   All survey comments, whether electronic or handwritten, would need to be read by staff to ascertain personally identifiable information that could not be disclosed. Not only does this create potential FERPA violations, but at a public university this could represent hundreds of thousands of comments every semester. The personal nature of some comments would result in significant challenges, especially if students can be identified by handwriting, by the nature of comments, or by phrasing and word usage. The legal ramifications for faculty who may be subjected to racist, sexist, or libelous statements made publicly available must also be considered, and that would require careful reading of all electronic comments as they are subject to Open Records requests. And there would be costs for administrative management and oversight.

3. **What are the total costs associated with full implementation of this request?**
   The FCEC cannot speak to the monetary costs, which seem considerable in view of FERPA requirements, IT maintenance resources, and CTL administration, but we believe that the costs of undermining the purpose for having CIS’s in the first place—to allow students to give personalized feedback to their instructors for the betterment of their education—would be incalculable.

   In addition, our review of the Memorandum from UT System Office of General Counsel suggests major difficulties with release of student comments: 1) checking a box on an electronic form does not seem equivalent to written “FERPA compliant consent;” 2) redacting sufficient information to ensure that an individual is not identifiable to the public at large though still possibly knowable to fellow classmates does not fall within the legal requirements of FERPA. One issue not addressed in this memorandum is legal liability for making public personal information about employees.

Fundamentally this proposal would change the purpose of Course Instructor Surveys away from helping students and faculty obtain better educational experience to having a public and unreliable rating system for University faculty teaching. As such, it would not contribute to our goal of achieving academic excellence in teaching and research.

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Comments and discussion contributed by the Educational Policy Committee [chair, Mary Rose] were important in formulating this statement.