

Executive Summary

This response to the CEPT report was prepared by Melanie Campbell and is submitted on behalf of the Status of Women and Equity Committee (SWEC), a subcommittee of the Faculty Association of UWaterloo (FAUW). SWEC appreciates the substantial work of the CEPT committee, including broad consultation with the campus community and the inclusion of several major concerns. We commend CEPT for noting the limitations of course evaluations, inherent biases and privacy concerns.

Because SWEC's primary concerns focus on bias, we do not recommend the use of course evaluations to assess teaching effectiveness. Such use or publication of results could unfairly disadvantage groups within the university; the results could be applied inappropriately and the University may be harmed.

Recommendation 1a): That UWaterloo implement student surveys that assess students' perceptions of a course and of their learning rather than as course or instructor evaluations.

1b) That student feedback data should not be published or made broadly available.

Feedback from students regarding course content, organisation and assessment is important. However, UWaterloo should not use student feedback to evaluate teaching performance or make the results widely available as they suffer from flaws including sexist, racist and other inappropriate biases⁽¹⁾. Evaluative use or dissemination of results of student surveys could further entrench biases.

Recommendation 2a): Before proceeding with a new student feedback tool, UWaterloo should investigate whether there is evidence of discrimination in previous student feedback on the basis of sex.

SWEC believes that new student feedback tools should not be implemented until analyses have investigated potential biases in currently used instruments. This analysis should be conducted across all teaching units but particularly where a specific sex is underrepresented. Previous research has identified a bias against female instructors including at the University of Waterloo.

Recommendation 2b): SWEC recommends an investigation of potential bias (by sex, race and other) in student feedback tools used at UWaterloo on an ongoing basis.

If new student feedback tools are introduced, they should be assessed on an ongoing basis as the recommended five-year review will allow bias to become entrenched. If the results of the analyses in either 2a) or 2b) show a bias against females as demonstrated previously at UWaterloo and more broadly in the literature, this would be further evidence that these tools should not be used for evaluation of faculty and their results should not be published.

Recommendation 3: Appropriate training to reduce sexist, racist and other biases⁽¹⁾ should only be implemented if there is evidence that it counters bias. It should be designed by experts, and presented in person.

We also recommend that student feedback data be assessed to determine whether any training has been effective in reducing bias.

Recommendation 4: Appropriate mechanisms should be in place to mitigate the impact of sexist, racist or other inappropriate comments⁽¹⁾ in student feedback .

In anonymous, online forms, inappropriate sexist and racist and other comments occur. Exposing instructors to such comments could be contrary to the Ontario Human Rights Code.

Recommendation 5: A committee should be struck to investigate the methods to be used to evaluate the teaching effectiveness of instructors and student learning and their recommended weighting in performance and tenure and promotion evaluations, at UWaterloo.

Because of the strong evidence that student feedback should not be used to evaluate the teaching effectiveness of instructors, other methods are needed.

Introduction

This response to the CEPT report was prepared by Melanie Campbell and is submitted on behalf of the Status of Women and Equity Committee (SWEC), a subcommittee of the Faculty Association of the University of Waterloo (FAUW). Professor Melanie Campbell, a member of SWEC, was appointed to the CEPT committee late in their deliberations.

SWEC recognises that a substantial amount of work was put into the CEPT report by a large committee. We appreciate that the CEPT consulted broadly with the campus community and reported on several of the major concerns. In particular, we commend CEPT for noting the limitations of course evaluations, inherent biases, and privacy concerns.

SWEC has made specific recommendations to help address concerns highlighted in the CEPT report as well as additional concerns raised by the campus community. SWEC's primary concerns focus on bias. We wish to make clear that, in providing feedback on the proposed instrument, we do not recommend its use to assess teaching effectiveness nor publication of the responses. Such use or publication of results could disadvantage certain groups within the university; the results could be applied inappropriately and the University may be harmed. However we do believe that student surveys provide important feedback to instructors.

A critical concern is the framing of student feedback as "evaluation." This framing is problematic because bias is introduced when students are asked to rank instructors and courses and that information in turn is used to evaluate faculty performance. Feedback from students regarding course content, organisation and assessment is considered important by the majority of faculty. However, UWaterloo should not rely heavily on student feedback to evaluate teaching performance as many extraneous factors, including bias, influence scores.

The course evaluation committee sought to establish best practices concerning all aspects of course evaluations, based on a review of the literature. CEPT raised several issues throughout the report and SWEC offers suggestions to address these and additional concerns.

Use and publication of course evaluations

While the CEPT report suggests that "Refinements to the course evaluation instrument could be made as necessary," refinements will not address the fundamental concerns raised in this document. Specifically, the statement that "The testing of course evaluation instrument results will determine the reliability and validity of the instrument, including the influence of variables that could bias results at Waterloo" assumes that revision of the evaluation after testing could fix any issues with validity and bias, but no evidence of a valid, bias-free instrument is presented in the literature.

CEPT recognise in their report that "inherent biases in evaluation" are a key concern and devote Sec. 6.1 to its discussion. CEPT suggests that evaluation exercises can be compromised by factors such as bias (e.g. gender and race). Among other recommendations the CEPT suggests minimizing the potential for "inappropriate comments". SWEC cautions that this approach does not fully address the important implication of bias— that is: evaluations with bias will discriminate against certain groups. Using discriminatory evaluations will in turn introduce bias into any judgements (including salary and

promotion) that rely on input from these evaluations.

The committee acknowledges that biases exist at the University of Waterloo, that researchers found evidence at UWaterloo of bias against women in course evaluations completed from students who received lower midterm marks, and that bias can be a factor in the interpretation of course evaluations. This bias is a serious concern for UWaterloo.

Since SWEC is concerned that student evaluations of teaching as proposed (and currently used) have major flaws and evidence suggests that they suffer from sexist, racist and other inappropriate biases⁽¹⁾ against instructors, the negative impacts of these evaluations on performance and tenure and promotion evaluations is a concern. We recommend surveying students regarding their experiences. The flaws of these surveys preclude them being used as a form of instructor evaluation or making the results widely available.

Recommendation 1a): That UWaterloo implement student surveys that assess students' perceptions of a course and of their learning rather than course evaluations.

CEPT recommends that the rankings from course (and instructor) evaluations be made available to all members of the university. But unless the issue of bias has been addressed, and the literature has yet to offer a solution that adequately addresses intrinsic biases in course evaluations, then providing access to the results from surveys or evaluations that may be discriminatory could serve to reinforce negative expectations directed towards specific instructors and **is potentially harmful to the campus environment.**

Recommendation 1b) That student feedback data should not be published or made broadly available.

Investigation of bias in student feedback surveys

Feedback from students regarding course content, organisation and assessment is considered important by the majority of faculty. However, if it is to be a useful tool to improve the student learning experience, we should safeguard against it being a biased tool, or one that contribute to a “poisoned work environment.” (see recommendation 4 below).

Analysis of bias in the proposed student feedback instrument is particularly important since many of the proposed questions and format are similar to current UWaterloo evaluations. It may also be that the bias in these evaluations has contributed to the salary gap between male and female faculty at the University of Waterloo. If there is evidence of discrimination on the basis of sex as found in many other studies, the proposed student feedback instrument should be re-evaluated.

Recommendation 2a): Before proceeding with a new student feedback tool, UWaterloo should investigate whether there is evidence of discrimination in previous student feedback, on the basis of sex. This analysis should be conducted across all teaching units but particularly where a specific sex is underrepresented.

Regarding biases, the committee states that “These are serious issues that the project team has discussed and addressed” and suggests that “it is possible to reduce the potential for bias, in its many forms, through the design of the course evaluation instrument.” Unfortunately, there is no evidence that design can reduce the biases associated with these instruments. For this reason one must be aware of bias in choosing how student feedback will be used.

Note that the CEPT committee proposes a full evaluation of the new student feedback instruments after five years. However, because of the known potential that the evaluations will entrench bias and discrimination against underrepresented groups, we recommend that any student feedback tool in use should be assessed for bias on an ongoing basis.

Recommendation 2b): SWEC recommends an investigation of potential bias (by sex, race and other) in student feedback tools used at UWaterloo on an ongoing basis.

If the results of the analyses in either 2a) or 2b) show a bias against females as demonstrated previously at UWaterloo and more broadly in the literature or against any other group⁽¹⁾, this would be further evidence that these tools should not be used for evaluation of faculty, and that UWaterloo must seek ways to mitigate the harm from their use as a formative tool for instructors. (See Recommendations 3 and 4).

Appropriate training to reduce bias

The CEPT report recommends mandatory online training to address and “acknowledge the importance/role of bias (especially concerning gender and race) when completing and interpreting evaluations.” SWEC is concerned that the efficacy of online training could be very low. In the literature, there is little evidence that such training reduces bias in student evaluations. We suggest that it is important to further investigate whether any training would be effective and only implement training which has been shown to reduce bias. Then the effects of implemented training on potential bias in student feedback should be monitored. We recommend that any training modules be designed by experts in the field, preferably presented in person, and that the overlap of such training modules with other training initiatives on campus be considered. We believe that UWaterloo should set a high standard in addressing these issues.

Recommendation 3: Appropriate training to reduce sexist, racist and other biases⁽¹⁾ should only be implemented if there is evidence that it counters bias. It should be designed by experts, and presented in person. We recommend that student feedback data be assessed to determine whether the training is effective in reducing bias.

Impact of inappropriate student feedback on instructors

Another argument in favour of not using student feedback surveys to evaluate faculty is that, as the CEPT report suggests that “Written comments from students are intended for the instructor’s use only.” However, the instructor is given no recourse if the written comments show evidence of sexism, racism

or other biases covered by the Ontario Human Rights Code that should not influence the assessments of instructors⁽¹⁾. Such comments are indicators of explicit bias and reinforce that student feedback should not be used in performance evaluation. Moreover, expecting instructors to read such comments could be said to contribute to a “poisoned work environment” and could be contrary to the Ontario Human Rights Code. It is well known that anonymous, online “comments” lead to bullying, sexist, racist and other inappropriate comments⁽¹⁾. Students should be warned that such actions could result in their right to anonymity being withdrawn.

There is a further concern that online evaluation amplifies bias. For example, students who do not attend classes may be more likely to write a poor evaluation when they have a strong negative response to their mid-term examination results. In addition, there is evidence that anonymous, online critique often results in comments which are less likely to be made in a signed survey. These negative comments are often sexist and racist (for example the recent spate of inappropriate comments directed at female sports-casters) and many news outlets have taken down their online discussion forums as a result.

Recommendation 4: Appropriate mechanisms should be in place to mitigate the impact of sexist, racist or other inappropriate comments⁽¹⁾ in student feedback. Student feedback data should be analysed (see rec 2b) to determine whether training is effective in reducing bias.

The Place of Course Evaluations in Teaching Evaluations:

The CEPT report states that “Since student feedback is only one data source, other sources of evidence of teaching/course quality should take on a substantially enhanced role (see Policy 77). There is a need for continued discussion about how methods such as peer evaluation, teaching dossiers and other approaches could be applied in a consistent, systematic manner campus-wide to evaluate both teaching and course design and delivery.” If the student evaluations do not assess teaching quality or student learning, methods to better evaluate teaching effectiveness and student learning should indeed be investigated. In addition to the ideas presented in the CEPT report, we also suggest: teaching practices inventory and correlating teaching in a course with student grades in later courses as potentially helpful instruments to assess teaching efficacy. However, an investigation of better methods should come with the acknowledgement that student evaluations should not remain a source of teaching assessment.

To further support the notion that we need to find more effective tools to evaluate instructors, a great deal of literature suggests that a student’s ranking of a professor is not linked to their learning performance. There is a lack of correlation between student reports of learning and actual learning. Yet learning outcomes represent a key objective for both the instructor and the university. SWEC is concerned that while the CEPT report recognizes that course evaluations measure “perceptions regarding teaching effectiveness and learning experience,” it later equates a student’s perception of learning with whether learning was “facilitated”.

It is however likely that many of the survey questions suggested in the CEPT report may still be useful means to improve students' experiences at UWaterloo and give instructors feedback, but are problematic as an instrument for instructor evaluation. SWEC feels that the flaws of student surveys, as presented in the literature, and particularly evidence of bias are deep rooted. We recommend that better methods to evaluate instructors be employed.

Recommendation 5: Consistent with the CEPT report, we suggest that a committee should be struck to investigate the methods to be used to evaluate the teaching effectiveness of instructors and student learning, at the University of Waterloo. This committee should also clarify how these evaluative methods should be weighted in performance and tenure and promotion evaluations.

Conclusion

SWEC believes that UWaterloo should consider carefully the evidence that student course evaluations are flawed and frequently exhibit sexist, racist and other biases,⁽¹⁾ particularly when anonymous and conducted online. We recommend that the instrument described in the CEPT report be implemented to gain student feedback of their experiences in courses but that student numerical scores not be used to evaluate instructors and not be made broadly available. The release and use of this data have the potential to entrench inappropriate bias. Given the evidence in the literature of bias in student evaluations, (including at UWaterloo), given the impact of inappropriate bias on the work environment, and given the recently documented salary differential between male and female faculty at UWaterloo, the potential that the proposed evaluations could entrench systemic bias is of grave concern. We are therefore hopeful that UWaterloo will accept and implement the recommendations that we have made.

SWEC would be happy to consult further on these issues and our recommendations.

Footnote (1): The Ontario Human Rights Code outlaws discrimination on the basis of: Age; Ancestry, colour, or race; Citizenship; Ethnic origin; Place of origin; Creed; Disability; Family status; Marital status (including single status); .Gender identity, or gender expression; Sex (including pregnancy and breastfeeding); and Sexual orientation.