# 2.9.1 SAP (request by Financial Aid)

No comments received

# 4.9.1 Faculty Evaluation (requested by PRLOA/AASC/STaR/HLC 3A)

*Psychology:*

Part 2, Subpart F:. I am not sure RSI needs to be defined in this document but, if so, we should use the federal definition. I understand that “can be applied to synchronous interactions only” is clarifying the definition and that leaving off the fifth form of substantive interaction does not change our practices but I think it is a mistake to reword the federal definitions.

We understand the concern. There is a great deal of confusion in much of the individual campus guidance across the country around what direct instruction can be. The guidance of WCET is that it is synchronous only, so we’ve included it following their guidance:

What is “direct instruction”?

The Department does not define “direct instruction” in the regulation. In the Department’s April 2021 webcast on the regulations, in response to a question from WCET staff the Department indicated that **direct instruction is intended to be a situation in a synchronous environment where both the instructor and student are present at the same time and are both engaged**.

Source: WCET Regular and Substantive Interaction Refresh: Reviewing & Sharing our Best Interpretation of Current Guidance and Requirements [[link here](https://wcet.wiche.edu/frontiers/2021/08/26/rsi-refresh-sharing-our-best-interpretation-guidance-requirements/)]

This ties into another other issue in subpart F where it states, “As a general guideline, faculty should aim for an average of one (1) hour per week per credit of Regular **and/or** Substantive interaction”. I am concerned that the “and/or” will create problems where faculty think an hour of regular interaction or an hour of substantive interaction meets RSI. This policy could easily be misinterpreted by HLC as evidence that we are, in fact, out of compliance.

We believe there will be continued conversations around how to understand Regular and Substantive Interactions, and that our policies will continue to evolve as our understanding evolves. The current language is based on current guidance from the Department of Ed ([recording of presentation given April 26, 2021](https://www2.ed.gov/policy/highered/reg/hearulemaking/2018/distedandinstitueligi.mp4)). We cannot guarantee that HLC will not misinterpret our intent, and we are trying to reflect expectations and current guidance as much as we are able.

*For purposes of this definition,* ***substantive interaction*** *is engaging students in teaching, learning, and assessment, consistent with the content under discussion, and also includes at least two of the following—*

1. *Providing direct instruction;*
2. *Assessing or providing feedback on a student’s coursework;*
3. *Providing information or responding to questions about the content of a course or competency;*
4. *Facilitating a group discussion regarding the content of a course or competency; or,*
5. *Other instructional activities approved by the institution’s or program’s accrediting agency.*

*An institution ensures* ***regular interaction*** *between a student and an instructor or instructors by, prior to the student’s completion of a course or competency—*

1. *Providing the opportunity for substantive interactions with the student on a predictable and scheduled basis commensurate with the length of time and the amount of* *content in the course or competency; and*
2. *Monitoring the student’s academic engagement and success and ensuring that an* *instructor is responsible for promptly and proactively engaging in substantive* *interaction with the student when needed, on the basis of such monitoring, or upon* *request by the student.*

We did add back in #5 in a modified form to acknowledge that program accreditors, like ACEN, ABA, etc., may have other instructional activities approved. At this time, HLC does not, if they ever do, we’ll modify the policy.

On Part 3 subpart B, I do not understand Learner Outcome assessment as it pertains here. Wouldn’t this be part of annual assessment or program-review?

Learner Outcome assessment is a method of evaluating the effectiveness of teaching strategies on student learning. We see this as a valuable way to identify where faculty are strong in the classroom and where improvements can be made. An LOA can count for both evaluation and for the Program Review/Assessment process. It is a method of ensuring that we are assessing everything everywhere all the time. We added this clarification to the definition.

Part 5 subpart C. Year 2 “Student feedback and either a peer review **or** a classroom visit.” I think that the three year evaluation cycle should include at least, one instance of peer review. Peer review is a normal standard in education and academia. Faculty have full freedom to choose who that peer is, e.g., it may be a department member, any faculty member, the STaR center, or a peer from another institution. Faculty should be given freedom to determine the parameters of that review (the peer review form should be a guideline and not proscriptive). As our current policy is written, a faculty member may avoid ever having peer review—something that HLC directly commented on. Peer review also helps the reviewer. We learn from each other and this policy could foster a more collaborative environment.

We believe that most faculty will opt for a peer review rather than two visits from their dean. We understand the spirit of the feedback. We did consult with State MSCF and their guidance was that **requiring** faculty to have a peer review was a violation of our contract.

The main point we were trying to address was the fact that faculty could avoid having anyone observe their teaching. We have closed this loophole with this language.

I also think that student feedback should occur in all three years of the cycle. IR can automatically send out the student feedback survey to all students. Faculty who craft more specific feedback questions should be allowed to notify IR in order to opt-out of the generic survey but not to opt-out of student feedback. Not only does this simplify that piece of the evaluation—it occurs every year— it’s good for students to have the opportunity to comment on their classes.

Student feedback does currently occur every year. Faculty have the option of choosing between the IR survey, their own customized survey, and a learner outcome assessment. We felt at least one learner outcome assessment was beneficial (see response above).

On Part 6 Subpart B, I would prefer that this policy is consistent with the 2023 syllabus checklist requirements. For example, this list does not include: college name or academic integrity statement with link to code of conduct.

Thanks! We added these, as well as an access services statement.

Part 7: Recordkeeping This section puts all the responsibility for scheduling and initiating evaluations on faculty. I would prefer a more balanced approach that includes responsibility for the supervisor to initiate the discussion and to track the evaluation cycle.

Although Subpart A is titled “Faculty Responsibilities,” we see much of shared responsibility in this section. Faculty assist and coordinate with supervisors on most of these responsibilities.

We did add a statement to the Supervisor Responsibilities to mirror this language.

The Office of Academic Affairs is committed to creating a way to track the evaluation cycle. This is something that hasn’t been done well, and we feel this is fair feedback that needs to happen, although not necessarily be enshrined in policy yet—since we don’t have the method in place yet. We can add this once the system is in place.

Diversity and Inclusion Focus: Throughout the document there is a focus on Diversity and Inclusion—which I, personally, like a lot. However, I’m concerned because disaggregated information is not available to faculty and aggregated information is only available once grades are posted. If a faculty member tries to evaluate their practices within the classroom by race or gender, they may be left in the strange position of guessing students’ categories (or asking, which can be uncomfortable for some students). When deans evaluate faculty on this piece, I want them to be aware that faculty can incorporate best practices but they may not be able to assess these practices.

This is a valid concern that we all need to keep in mind. This will be an ongoing campus conversation. We do think that the disaggregated data is important for faculty to regularly track, and it is only a piece of having a diversity and inclusion focus in their teaching. The main place the review of disaggregated data appears is in the self-evaluation, which the faculty member should be driving: the faculty can explain how they are understanding and using their data.

Faculty:

I think the documentation on RaSI that was included in 4.91 (Faculty Evaluation Procedures) is a good start.  I look forward to further clarification.

Thanks!

# 3.51 Credit Hour (requested by STaR/HLC 3A)

We’ve removed the language restricting the amount of time devoted to the non-lecture credit hour. We appreciate everyone’s passion and feedback on this issue.

*Biology Department:*

I would like to comment on Policy 3.51 Assignment of Credit Hour Policy, Subpart G.

I strongly object to a policy which explicitly or implicitly states that lab courses cannot have requirements for students to spend time outside class doing work related to lab. This is not the standard for science labs, in any university or college that I have taught in, been enrolled in, or know about. Science labs are specialized environments in which we engage in active learning with students with equipment and materials which they often do not have access to outside of the lab setting. However, like many other courses, we expect students to prepare for time in class by reading about the topics and protocols, and spend time afterward reflecting on the results and their implications through writing lab reports and summaries. We also expect students to review the concepts and skills by studying for lab exams, and/or doing homework sets. I repeat again, this outside work to prepare, reflect, and review is a standard practice in our field.

Without student time expected for preparation, reflection, and review, we would have to teach lab in a way unlike how labs are done in other colleges and universities, and we would have to teach less rigorously than our peer institutions. That would be a strange and unjustifiable choice for NHCC, if we claim to prepare students for transfer. I am part of several national organizations of biology and chemistry professors. I collaborate closely with many, and we share our assignments and syllabi, so I am not just guessing, it is verifiably true that these faculty at other colleges and universities require work outside of lab meetings for their students.

This policy change seems to be a revival of an idea that was already brought forward in 2017 at NHCC and received similar negative responses from the science faculty at that time (including from me). No one I know in the science department is asking for this or has spoken in support of it. Let's put it to rest. It's not helpful for our courses in transfer, it's not helpful for us to maintaining rigor, and not desired by the science faulty. Please do not add this wording explicitly limiting us from teaching in the way that we think is best for our students.

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It has been brought to my attention the potential impact of Policy 3.51 Assignment of Credit Hour Policy, Subpart G and I would like to comment on it.

I strongly disagree with a policy that states that lab courses cannot have requirements for students to spend time outside of class doing work related to lab material. Any reputable college or university with science courses including laboratories in their curriculum hold a high standard for laboratories and students in those labs. Science laboratories are dynamic, active learning opportunities for students to learn fundamental learning and use of highly specialized techniques, concepts and equipment usage. It is essential for students to prepare for labs before coming to laboratory and to take time after laboratory interpreting data, researching and reflecting on concepts and protocols by writing laboratory reports and summaries. Outside of laboratory homework is an additional way to reinforce learning of complex processes.

These are the students/individuals who will become our practicing nurses, physicians, biologists and scientists; the standards are high, and should be high. Without these high expectations for science courses with laboratories, we would be left teaching watered down science with less rigor than our peer institutions. I believe this is a disservice for our students (and any student) at NHCC seeking to achieve their goals either at NHCC or wanting to transfer to another institution where this rigor is expected and may result in our credits not transferring to our peer institutions.

As a research scientist in the veterinarian sciences, I know first-hand that this policy would HURT our students and our communities. As a student, professor and research scientist in 5 different highly reputable universities I know that would not be acceptable. At all. No reputable science course with a laboratory would accept this policy and would agree that outside of lab work is required for building the science individuals of today and the future.

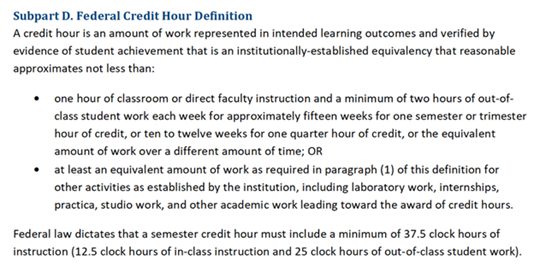
In my opinion, do not add this wording that directly limits science faculty from teaching and mentoring our students. Any reputable science department would be against this wording. This would negatively impact the reputation of the NHCC science department.

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I was not at the Shared Governance meeting on Friday, but I understand that there was a conversation about science lab credits. Not surprisingly, I concur with the position of my colleagues.

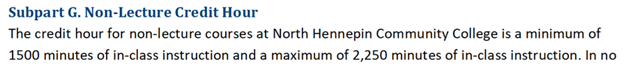
My comments refer to the following:

Shown below is the federal credit hour definition. Why would this definition not be applicable to lab credits? I believe that laboratory work is featured in the second bulleted section.



Subpart G refers to non-lecture credit hours. I see absolutely nothing in Subpart G that would suggest that the section refers to science laboratories. If the interpretation is that non-lecture credit hours pertain to lab credits, I believe that interpretation to be mistaken. I can imagine that non-lecture credit hours might include independent or guided studies or projects and more.

Labs are not separate courses. Labs do not possess their own credits and simply do not exist apart from the lecture. A 4-credit course typically has time apportioned to lecture (3 cr.) and lab (1 cr.), but it is simply a 4-credit course for the students. Labs do not have separate registration apart from the lecture. It is one course.



Screenshot 2 of Subpart G. Non-Lecture Credit hour

*Chemistry:*

For Policy **Number: 3.51:** I studied the following. (I tried to open the background files, but several of them had broken links.)

I read that : For each hour of in-class instruction, students are expected to complete two hours of instruction outside of class.

I am proposing that should be taken as “at least.” I can promise you that some students do more and some students do less depending on how much preparation they have before they came into the course.

I also read that: The credit hour for non-lecture courses at North Hennepin Community College is a minimum of 1500 minutes of in-class instruction and a maximum of 2,250 minutes of in-class instruction.

This is a valid statement.

Is HLC saying that we add:

In no case should students be expected to complete more than 2,250 minutes of instruction per credit, whether in or outside of class.

As Paul Melchior pointed out, this is a violation of Academic Freedom to dictate how much of our labs are in class, hands-on, wet labs and how much prep and post lab work they have to do in order to get credit for the class.

Can you show me where it says in the HCL guidelines that we should expect *less* of our students? I thought they wanted us to show greater accountability.

Many of our science students are pre-Nursing. If anyone has had exposure to the Hospital, Transitional Care, leading to Assisted Living as I have these last three months, a Nurse with good problem solving skills is worth their weight in gold. The ones who pass things back to the Social Workers make any process the family is dealing with that much harder.

We went thru a process on campus last Spring that was handled very poorly. It led to taking a credit away from a chemistry course. The original course (and College Algebra that was taken out of the program years ago) used to be used by the Nursing admission advisors as the deciding factor of whether a student would succeed in the Nursing program. Not due to the material taught, but the problem solving skills that were taught. It also was a good measure of how dedicated the student was to succeeding and if they had the capacity to process large amounts of information and act accordingly.

*Sciences:*

We were informed that a language change to NHCC Policy 3.51 has been proposed. The proposed change in Subpart G states that *“In no case should students be expected to complete more than 2,250 minutes of instruction per credit, whether in or outside of class*.”

If memory serves, we had a similar discussion in 2017 on this topic. Based on that and discussion at last week’s AASC meeting , ‘instruction’ here is apparently being understood to include assigned student work of any kind outside of the course. If we (Biology, Chemistry, Physics, Geology/Nat Sci) have misinterpreted this, and ‘instruction’ instead refers to direct, substantive interaction with the instructor (i.e. time in the lab itself), please clarify as soon as possible.

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Policy Committee Members,

We were informed that a language change to NHCC Policy 3.51 has been proposed. The proposed change in Subpart G states that *“In no case should students be expected to complete more than 2,250 minutes of instruction per credit, whether in or outside of class*.”

Based on information I received from Deanna Forsman, as well as discussion at the recent AASC meeting, it appears that the word ‘instruction’ includes assigned student work of any kind outside of the course. If we have misinterpreted this, and ‘instruction’ refers only to direct, substantive interaction with the instructor during lab sessions, please clarify.

However, if the former is true, then this policy change would effectively limit us from assigning pre-reading, post-laboratory reports, analysis, or supporting assignments for any lab courses. In that case, this change would not only be inappropriate and a gross intrusion into departmental and individual decision making on pedagogy, but contrary to how collegiate science is taught nationwide. The policy will immediately weaken what are typical expectations of science students. In turn, it would likely reduce the transferability of NHCC’s science courses to numerous regional institutions. I know of no other colleges, private or public, that have physics, chemistry, biology, or geology lab components in which students are not assigned or expected to perform work outside of scheduled hours.

Furthermore, this change would significantly damage academic freedom for any instructor teaching laboratories. Forced pedagogical changes to suit a local policy change will water down NHCC science courses.

Again, if I am interpreting the word ‘instruction’ differently than the committee, please inform the campus as soon as possible. However, if your interpretation includes any assigned work beyond the laboratory period, I vehemently opposed.

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I wholeheartedly agree with the views that my colleagues in Science have expressed about the proposed language changes to Subpart G of NHCC Policy 3.51. I fully oppose these changes becoming an accepted policy.

In addition to the concerns/objections previously submitted, I would like to add such changes would also make it impossible for NHCC science courses with laboratory components to meet the requirements of Goal Area 3 of the Minnesota Transfer Curriculum.

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I would like to echo ---- sentiment and also add something I noticed when I was looking at the language that NHCC had and Federal Policy that we had a link to:

Feds: "One hour of classroom or direct faculty instruction and a *minimum* of two hours of out-of-class student work each week for approximately fifteen weeks for..."

NHCC: “For each hour of in-class instruction, students are expected to complete two hours of instruction outside of class.”

Why does the current policy that we have not match the Federal Policy? If you include “minimum,” in the NHCC policy, then the mandate to have only so many minutes outside of class is invalid for lab or similar situations.

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I would like to comment on Policy 3.51 Assignment credit hour policy, Subpart G. I have a lot that I could say about this, but I will try to be brief and get across my main concerns.

I am very concerned about how this affects our ability to effectively teach science labs. The construct of any college level science lab requires time spent outside of lab on the part of the students. This would be catastrophic to multiple Biology courses where students depend upon time outside of class working through practice problems, writing lab reports and optional open lab times to review models. Very few biology concepts are mastered during class time. The lab time is for instruction, an explanation of the material and short time to gather data. The real learning comes from time spent putting the data in written reports, practicing problems, and studying that happens outside of class time. Not only would this hinder the student's ability to effectively learn the material for the course and their future career, it would also lead to potential issues with transfer. I am also concerned that we are facing HLC scrutiny regarding rigor and this will only make our science courses less competitive and far less rigorous. Furthermore, this feels like a major infringement on academic freedom.

Science faculty have experience in how to effectively teach labs and we all agree that it requires significant time outside of class. I urge the committee to consider eliminating this phrasing within the policy that will negatively impact all students who take a science course at NHCC.

Math Faculty:

I’ll just say that I support Science Faculty in their concerns about the non-credit hour policy. I don’t have a dog in this fight but I want to lend my support to those who do.

# 2.21.1 Privacy of Education Records Procedure (requested by students/provost)

* I understand the desire to make the titles of our leaders more culturally responsive. All of these policies have dropped Chief for Senior. The titles are capitalize indicating that they are proper titles, but the working titles of campus leaders are not aligned. Is this an issue and will it cause confusion to our students?
  + We recognize this as an issue. Our student member commented that regardless of the title, it is difficult to know who specifically that person is. We’re thinking that there may be a better way to signpost who students should ask/where they should look to get help and support.
  + We’re thinking that as a short-term measure we should signpost on the Policy Landing page on the web that for support, people should contact a member of the Policy Committee
* 2.21.1 Privacy of Education Records Procedure: Part 8. Procedure to Correct Educational Data
* This section was not updated to align with Senior Student Affairs Officer but rather lists Chief Student Affairs Officer
  + Thanks, made these changes!

# 2.1 Campus Student Associations (normal review cycle)

No comments received

# 3.6 Student Conduct Policy (normal review cycle)

No comments received

# 5.32 Records Retention Policy (normal review cycle)

* 5.32.1 Records Retention Procedure, Part 2. Record Custodians, Subpart A. Designated Records Custodians
* 2. Senior Finance and Facilities Officer (written Office currently)
  + Thanks! We fixed this.

# 5.32.1 Records Retention Procedure (normal review cycle)

See above

# 6.13 Election Activities on Campus Policy (normal review cycle)

No comments received

# 6.13.1 Election Activities on Campus Procedure (normal review cycle)

No comments received