From: David Trubatch, President of the University Senate, on behalf of the Senate Executive Board

Subject: Recommended Policy on the Integrity of Course Web Spaces in the University Learning-Management System – Reply to response letter from the Provost

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The items below recapitulate key points from the discussion following the original presentation of the letter from the Provost (dated January 11, 2016) to the Senate Executive Board, in response to the Senate recommendation.

1. The proposed policy does not prevent the use of data analytics to study student activity on the Learning-Management System (LMS). The policy would prohibit the collection of data identifiable to a specific student, instructor, or course, without the knowledge and permission of the instructor. However, the proposed policy does not limit the collection of any data, when undertaken with the knowledge and permission of the instructor.

2. The proposed policy places no restrictions on studies with de-identified data. The use of de-identified data is a standard practice in studies with human subjects. The removal of identifiers does not prevent determination of correlations within the data. Instead, de-identification prevents association of general findings with particular individual students and instructors.

3. Currently, there is no University policy that precludes modification of course Web spaces in the LMS by parties other than the instructor. Concern that a course Web space might be altered by an outside party is not hypothetical. During the time that the policy recommendation was being considered by the Senate, a survey (which was graded, and the score entered entered in the course grade book), was inserted by OIT into all course Web spaces, without notification of instructors.

4. If instructors do not feel a sense of ownership and control of their respective course Web spaces, there will be hesitance by many to make use of the full range of functionality of the LMS, despite its potential. For example, more than one faculty member has indicated to me (ADT) that they do not post scores for graded wok on Canvas, because they would not want anyone else to read the students' scores, draw possibly unwarranted conclusions, and then contact the students.

   The possibility that parties, other than the instructor, could monitor a student's progress in a course via the LMS is not hypothetical. Individual student's work in courses in the online MBA program, which is operated through the Canvas LMS, is monitored by employees of an outside contractor. The proposed policy does does not prohibit monitoring of students, only doing so without the knowledge and permission of the instructor responsible for a given course.

5. The statement "When a student withdraws or is dis-enrolled by the University, any individual course assignments or contributions from that student are automatically removed from the course by the Canvas technology; the University cannot modify that behavior." (p. 2) is not consistent with representations from OIT regarding the functionality of the Canvas LMS. In contrast, the elimination of student contributions to a course when the student is dis-enrolled was characteristic of Blackboard, the previous LMS.

   Nevertheless, this is a case where, within all practical limits, the function of the LMS ought to be dictated by policy, and not vice-versa.

6. A number of items discussed in the response letter do not reflect the intention behind the proposed policy. Specifically, the proposed policy is not intended to address any issues related to student privacy/FERPA. Moreover, the proposed policy has no relation to any proprietary interest of the instructor in the course materials posted on, or developed within, course Web spaces on the LMS.