26 February 2019

Dr. Anthony Peffer  
Provost and Vice President for Academic and Student Affairs  
Bemidji State University

Re: BSU Faculty Association Response to Draft Concept for Setting/Revising Course Caps

Dear Dr. Peffer:

Following is the official response of the BSU Faculty Association to the document titled “Draft Concept for Setting/Revising Course Caps” that was presented at Meet and Confer on February 6, 2019. For your convenience and efficiency, this response is divided into the following sections: Overall Position, Requests, Feedback to Specific Components of the “Draft Concept” Document, Comments, and Questions.

**Overall Position:** We are opposed to the Draft Concept for Course Caps dated February 6, 2019. As faculty members and educators, we believe relationships developed in the classroom are critical to student learning and success. Class size impacts faculty members’ ability to focus attention to their students and their students’ learning. While class size impacts a number of metrics important to institutional operations, course cap determination should, ultimately, be based on what is best for student learning and success. We respectfully request specific delineation of the problem or problems that the Draft Concept is intended to resolve. Further, we request that faculty hold an active role, as described below, in any decisions regarding course caps.

**Requests:** Through overwhelming support, faculty have the following requests and respectfully ask that you respond to each request.

1. Without a clear understanding of the problem or problems the Draft Concept is intended to resolve, the faculty are not provided adequate information to fully respond. The Draft Concept document included language of promoting relationship-based teaching and decreasing work load inconsistency. We support both relationship-based teaching and consistency of work load. But the Draft Concept seems to go beyond stated concerns, which has spurred rumors ranging from administration trying to avert a financial crisis to administrative retribution toward individual departments and faculty. To have an adequate voice in this discussion, faculty need full disclosure of the problem or problems this Draft Concept is intended to resolve. Accordingly, we request full enumeration of the problem or problems this Draft Concept is intended to address.
2. Proposals for course caps should be generated by departments, since these pedagogical decisions should be sourced in the expertise of faculty. **We request that the implementation of any revision of course caps be delayed until the 2020-2021 academic year.** This delay until the 2020-2021 academic year, combined with full knowledge of the problem or problems this Draft Concept is intending to resolve, will allow time and information for departments to propose revised course caps in consultation with Deans. Deans should be directed to solicit and discuss course caps with department chairs and instructors. This request will allow time for more thoughtful and deliberate faculty/dean conversations about course caps to ensure the needs of our students are met. This is based upon the concerns that caps are discipline-specific and may only be properly addressed through such discipline-specific conversations. We do not see any justification for a rush to implementation.

3. We appreciate the role and support of Enrollment Management and the Registrar in helping to anticipate student demand for programs and courses, and to project or identify any conflicts or bottlenecks in our offerings. With reliable projections of anticipated need, academic administration can work with academic programs to ensure course offerings best meet that projected demand while balancing BSU’s commitment to the needs of our current students and the workload of our faculty. If academic programs are provided reliable estimates for numbers of seats needed in various courses, academic programs can forward class schedules that meet those needs or, when necessary, provide academic administration with feedback and options on what is needed to meet those needs. **The faculty, under no circumstance, support any practice that empowers enrollment management personnel or the Registrar to trigger events leading to automatic increases in course caps.** Rather, academic supervisors, i.e., Deans, must retain the responsibility in any decision to override a course cap. As supervisors, Deans, in consultation with department chairs, would be able to weigh the impact of a course cap increase in any given semester on a particular faculty member’s ability to effectively teach and to complete other commitments, such as but not limited to: sponsoring student research, grant administration, departmental and university service, accreditation commitments, and the sort. Based on this consultation, Deans would be the supervisors to adjust workloads, create additional sections, change course caps, request a longer-term solution of curricular revisions, and/or move/add faculty lines, for example.

4. Please give a thorough justification on how raising course caps in multiple courses across campus relates to, and supports, the Gardner Institute initiative. The two seem to be fundamentally at odds with each other.

5. The faculty request that the “optimum” caps for writing intensive and/or speaking intensive classes be set at a minimum of 15 and “doable” caps be set at 20 to reflect the Association of Departments of English (ADE) policy: [https://www.ade.mla.org/Resources/Policy-Statements/ADE-Guidelines-for-Class-Size-and-Workload-for-College-and-University-Teachers-of-English-A-Statement-of-Policy](https://www.ade.mla.org/Resources/Policy-Statements/ADE-Guidelines-for-Class-Size-and-Workload-for-College-and-University-Teachers-of-English-A-Statement-of-Policy) The ADE is a branch of the Modern Language Association which is the governing body for the English profession and the burden of supplying evidence supporting quality instruction for caps that deviate higher than recommended by the MLA/ADE should rest with Administration.
6. As course caps are changed, the faculty request that the student-to-faculty ratio be computed and tracked yearly. The faculty also request these data be shared with Student Senate, as well as historic data, so the students are aware of the effects on the student-to-faculty ratio caused by course cap changes.

7. For any courses that undergo course cap increases, we request the Office of Institutional Research & Effectiveness track DFW rates and compare those rates to the courses when they were offered with smaller caps.

8. The Draft Concept states that the Academic Deans’ Council, in consultation with the faculty, will establish the characteristics of an “unusually writing and/or speaking intensive course.” We request elaboration on how this consultation with faculty would occur.

9. The Draft Concept states that the Academic Deans’ Council, in consultation with the faculty, will establish the protocols through which classrooms accommodating 40 are assigned when there aren’t enough to meet demand. We request elaboration on how this consultation with faculty would occur.

Feedback to Specific Components of the “Draft Concept” Document: Faculty feedback to the Provost’s original February 6th Draft Concept is provided; however, without the benefit of a clearly articulated problem the Draft Concept is intended to address, current faculty feedback cannot be considered complete. We respectfully request that Deans and departments consider the potential negative impact on learning and pedagogy when they discuss adjusting course caps (the process described earlier in this document.)

1. The following language is vague, one-sided, and overly restrictive. Vague in the use of “strong assessment evidence.” One-sided in that the literature is replete with scholarly articles demonstrating the deleterious effects of increasing cap sizes. In particular, we call Administration’s attention to “The Definitive Article on Class Size” by Alice Horning. Overly restrictive in the statement “Faculty members will not propose” because this is, contractually, an overreach. Faculty members can make proposals to Administration without limitations based on supporting documentation.

   Faculty members will not propose, and deans will not approve, a course cap lower than historical patterns (e.g. a course with a historical cap of 50 may not be reduced to 40) absent strong assessment evidence that’s supports such action (i.e. that student success rates decline at the higher enrollment). This expectation will remain even if the historical cap exceeds the “Optimum” number for its curricular level (e.g. 2000-level higher than 35).

2. We recommend the addition of language to address “maximum” class sizes. What capacity will be considered too large? At what point should there be a process for large courses to be offered in multiple sections to ensure learning objectives of the course are met and to ensure student needs are met? If the Draft Concept makes general statements about course minimums, it should make general statements about course maximums. To proffer that there is a realistic floor without admitting to a realistic ceiling is one-sided.
3. The following process language does not account for all situations and our opposition to enrollment management’s role in triggering class size increases is noted earlier.

The dean will approve or adjust course caps according to the guidelines presented above. Over the course of registration, the Executive Director of Enrollment Management or Registrar will notify the faculty member, department chair, dean, Provost, and bookstore of the change in cap.

Example from Chemistry: Chemistry offers two levels of freshman course (General/Principles of Chem) that have a combined enrollment that is linked to the number of lab sections that Chemistry can offer, which, in turn, have enrollments that are limited to safety/OSHA guidelines (this was a very big deal during the Sattgast Remodel because these guidelines forced Chemistry to go from 32 seat labs to 24 seat labs…Chemistry was informed by Pat Guilfoile, the architects, etc. that they would get into trouble if even considering bringing in one extra chair to make room for a 25th student). Because of this, increasing the enrollment of one freshman course means that the other course needs to decrease in order to keep the total number of lab seats constant. Each year, the ratio of General to Principles students will change, so Chemistry has often been asked to raise the cap on one right before a summer AAR section and Chemistry has had to remind them every year that the cap of the other one needs to decrease. Given this history, Chemistry cannot rely on Records to increase the cap of one course without having to remind them of the decrease in the other that needs to happen. Another issue is that this Draft Concept, as written, prevents the decrease in the other course from happening.

4. There is a definition for “doable” caps in the Draft Concept that is based on “effective learning environment” and “fundamental changes in pedagogical strategy.” How are these defined? Who defines them, and is it even possible to define them? For example, would a faculty member know ahead of time whether a substantial increase in their course cap to “doable” would result in a fundamental change in pedagogical strategy?

“Doable Cap” = The increased cap that, though not preferred by the faculty member, will nonetheless still provide an effective learning environment and not require fundamental changes in pedagogical strategy.

Comments: Numerous faculty from across programs and colleges sent forward a number of comments. This list represents a subset of those comments sorted according to their relationship to the Draft Concept’s rationale, the missions of BSU, pedagogy and effective teaching, impact on other professional work, considerations for online courses, the process of establishing course caps, and other comments.

The rationale for this Draft Concept

- In response to the Draft Concept Rationale “BSU’s current pattern of course caps is inconsistent,” course caps are proposed as part of the curriculum process which involves faculty and academic administrators at all levels. Our curriculum process is the optimal location for
discussion of course caps. The process involves a proposal by the teaching faculty, reviewed by
the academic department housing the course or program, considered by the curriculum
committee, approved by the academic administration, and voted upon by the faculty senate.

**Any decision to overhaul course caps on existing courses must, reasonably, include these
same parties: the faculty teaching the course, the academic department housing the course
or program, the curriculum committee, the academic administration, and the faculty
senate.**

- In response to the Draft Concept Rationale “Such inconsistency creates unjustified workload
disparities among faculty,” workload disparities need to be further defined so we can
adequately address this concern. In the past, workload comparisons have included such things
as average section size, FTE per faculty, number of majors, disciplinary accreditation
requirements, choice of pedagogy, among others. **To be clear, workload disparities will be
further magnified by increasing the class sizes in high-demand courses with caps already
above the institutional average.**
- This Draft Concept doesn’t reflect the values stated in the rationale (“student focused institution
dedicated to engaged, relationship-based teaching and learning”). The first paragraph also
mentions “unjustified workload disparities among faculty,” while not really doing anything to
correct the disparities that are happening between faculty teaching huge vs. normal sized
courses.
- Sliding scales of optimum/doable is not founded on student success and building relationship-
based teaching environments.

**Mission, values, and plans of BSU**

- According the Master Academic Plan, retention is a high priority, therefore, increased course
  capacities are in direct conflict with all peer reviewed literature oriented toward student
  retention.
- Students value and mention interaction with faculty and small course sizes as the primary
  factors attracting them to BSU and in their ultimate decision to attend BSU.
- Under this Draft Concept, when we meet with prospective students and families, we cannot in
good-faith and honesty advise that what makes us unique is that we know our students, our
students are not just a face among a sea of faces in the classroom. We interact with our students
so that all can be fully successful because our class sizes are small enough that we notice when
students are absent and can follow-up and offer assistance and/or alert our resources (e.g.
Starfish, contacting academic advisors, reach out to students, etc.).
- Higher course caps = lower student success, lower retention and deleterious to student mental
  health.

**Pedagogy and effective teaching**

- Research suggests higher course size has negative implications for student learning and student
  engagement. Consequently, we request the pedagogical rationale for each class for which a
course cap increase is being proposed.
• This will increase the time required to grade and provide minimum feedback which means less quality time with students.
• To keep presentations at the proper level means less instructional time which means students will not have an enriching, meaningful learning experience.
• Restructuring of curriculum will be required.
• Quality instruction will suffer. “I won’t teach high enrollment courses because I won’t be able to fit in presentations, I’m already at the maximum do-able.”
• Knowing student names (and their individual stories) is important! Can’t learn 80 names or more for each Course on a 4/4 load.
• In response to the Summary Guidelines: “Doable course caps will be set at increasing percentages… 25%...30%...35%”, such sizeable increases in course size will negatively impact faculty attention to individual students and their learning, and/or negatively impact faculty ability to perform in their other assigned duties, scholarship and service. In some cases, such significant increases in course enrollment could require faculty to alter their course structure and pedagogy to facilitate the changed course size.

Considerations for online courses

• In response to the Summary Guidelines: “caps for multiple sections of a given course will be the same regardless of delivery method”, online courses require substantively increased teacher time with one-to-one attention to students and their learning. The literature in the area of online teaching supports the need for lower class limits, and QualityMatters certification provides one means of documenting the interactive nature of online offerings. Online class caps should not exceed 25, and should be lower for QM certified courses, capstone courses, writing-intensive, presentation-intensive, and team-based courses. While MOOCs and other self-directed online classes can facilitate larger course caps, BSU does not offer self-directed online courses.
• Online course caps must be included in this discussion. (This proposal will force some on-campus students online…)
• Online interaction takes more time than on-campus interaction, this proposal constructively converts on-campus teaching to online learning because the 1:1 interaction will be significantly diminished.

Process of establishing course caps

• Based on a preliminary review of the upper division, major courses offered in Spring 2019, it appeared that many of the closed sections were courses that already had course caps set higher than the institutional median for upper division courses. Raising the course cap on an upper division course that already has a high cap has the potential of decreasing relationship-based teaching and raising work load inconsistency for faculty in those sections. If waitlists justify the creation of additional section(s), adding additional sections will best foster student progress toward timely graduation while maintaining the positive outcomes associated relationship-based teaching without further exacerbating workload inconsistencies.
Restricts dept/faculty rights as negotiated in our contract – curriculum and workload are directly related to course capacities.

Non-faculty making decisions regarding course caps without faculty involvement is not acceptable. This also violates faculty trust with administration.

Any increase in cap size must be approached cautiously with sufficient analysis and with input from impacted faculty. Under any circumstance where course caps would be increased by 10% or more, the Dean needs to work with the impacted faculty member regarding the faculty member’s work load and other assignments for the term, and to determine whether the faculty member needs to change the course structure and/or pedagogy.

Allowing administration to increase course size from Optimum to Doable without consultation of the faculty restricts the faculty and their ability to provide the best learning outcomes for the students. As the faculty plans ahead and the potential of changing to a Doable is usually last minute, any flexibility is removed from the faculty for learning pedagogies.

Prerequisite course capacities should only be increased in consultation with the department and chair.

A fair analysis of closed sections must also include an analysis of the students who were successful in registering for now-closed classes. Any situation where a student failed to register for classes during his or her window, and subsequently other students registering later filled the section, should not be considered a “failure” in terms of adequate course offerings, nor should it result in an overhaul increase of course caps.

There is already a false demand being created by the system which allows students to register for more than one section/type of the same course during the same semester (offered at different times and/or online, on-campus). Students are basically playing the system which creates false demand. The Records Office needs to fix this flaw in the registration system because it blocks students from registering and requires depts to offer additional, unnecessary sections by creating inaccurate waitlists.

The functional capacity of a Course is highly program/discipline/content specific. This Draft Concept does not account for that reality.

Not all disciplines and delivery are interchangeable. “We’re not building a Model T.”

Course caps need to be properly informed by student safety needs and faculty supervision of students using equipment or other student work which requires faculty involvement (e.g. swimming, chemistry labs, labs, group work, outside classrooms, etc.).

Course capacities are dependent on the intensity of instruction, not just number of computers or chairs in a classroom.

Course caps are more nuanced than just the restrictions of facilities, equipment, writing and speaking requirements.

There is an assumption in this document that there is some historical level of departmental control over what the course caps can be in a given semester, while the reality (especially for smaller departments) is that course enrollments have increased while the number of faculty has not, so departments are being forced to teach larger sections that are way bigger than what is considered “optimum”.

Data regarding historical capacities is due to not enough faculty.
• One premise for the Draft Concept course cap guidelines was to reduce faculty workload inequities. As such, it seems disingenuous to suggest “historical caps as optimal” when the historical cap exceeds the cap under the new guideline while simultaneously suggesting “historical caps as inconsistent and arbitrary” when historical caps are lower than the caps under the new guidelines. Many upper division courses have been offered at historically high, and not optimal, caps, so as to permit the offering of capstone courses at lower caps.

• “Unusually writing and/or speaking intensive” needs to be defined, it is very subjective.

• There should be a mechanism for breaking up larger courses that get too big, other than the one proposed (i.e. providing “strong assessment evidence”) for the following reasons:
  o Not every department on campus has an expert on educational research that would be familiar in how to conduct a study that relates achievement to class size…
  o Even if they did, I doubt the university would provide the resources to support such a study…this would require multiple years of simultaneously offering a large and small section of the same course with the same instructor and similar samples of students.
  o A large amount of the departmental assessment that we do at BSU is achievement related (i.e. grade/score on exam questions, etc.), but the articles above also consider the effect of class sizes on affective measures (student satisfaction/attitude, faculty comfort level) which are more difficult to measure and are not necessarily taken into account when these decisions are made.

*Other*

• Raising course capacities to solve what seems to be a budget problem on the backs of students and faculty is not sustainable, rather than executing a knee-jerk approach to the “problem” let’s think out of the box. Hire faculty to meet the needs of departments, especially departments of which have demonstrated growth and/or growth potential. Under this Draft Concept proposal, growth will not occur because it will be stifled and there is no incentive for growth because it only creates a higher workload and lowering academic expectations of students (more students in a course, less interaction, less critical thinking, more rote memorization for examinations, different types of examinations, etc.). BSU already invests an outrageously low amount of funding on faculty lines, this proposal exacerbates that issue! Let’s fund growth, academic excellence and student success. This proposal will be the beginning of a death spiral for our university and our students.

• This proposal seems to be a shotgun approach, if there are specific departments of concern, a discussion should occur with those departments rather than overburdening all departments under a one-size fits all approach. Because each department and specialties are unique, it is possible that there is a solid rationale for lower course capacities just like it may be appropriate that some courses have high course capacities.

• Currently, a number of student populations are privileged with the opportunity to register for classes prior to the scheduled registration window. If BSU is going to continue a discussion of revising course caps to address closed sections, now may be the time we add “graduating seniors with approved grad plans” to the list of students who are allowed to register prior to the scheduled registration window.
- Increasing the course caps and then not meeting the increased course caps could be interpreted as being a lower performing faculty member and/or department.
- We will have a lack of computer labs to accommodate courses with a cap of 30, increasing the capacities will exacerbate the problem.
- This proposal is against faculty self-determination.
- This will push students to community colleges.
- This proposal will have an impact on our external accreditation.

**Questions:** Some faculty submitted questions as well as comments:

- How will this Draft Concept impact course minimums?
- Will “optimum” and “doable” be used to assess and evaluate faculty?
- Will current courses caps above 40 (e.g. 1000 level) be reduced to fall within the proposed course caps?
- What impact will this have on HLC accreditation? This proposal will necessarily result in diminished faculty/student interaction.
- Where is the data supporting Provost Peffer’s proffered evidence?
  - Course size
  - Pedagogy
  - “Arbitrary” low course caps
  - High waitlist numbers
- How will the caps for combined undergrad/grad courses be addressed?
- How did administration arrive at the “doable” percentage? Seems arbitrary.
- Will Quality Matters standards for online delivery be considered? The proposed percentage increase seems to assume all course delivery is the same.

Thank you for this opportunity to provide our feedback to your Draft Concept for Setting/Revising Course Caps. We stand ready to work together in meeting the needs of our students, and respectfully request your consideration of our ideas and concerns.

Sincerely,
Derek Webb
Bemidji State University Faculty Association President

Cc: Dr. Randy Westhoff, Associate Vice President for Academic Affairs
Dr. Jim Barta, Dean of the College of Arts, Education & Humanities
Dr. Bonnie Higgins, Interim Dean of the College of Business, Mathematics, and Science
Dr. Joseph Ritter, Dean of the College of Individual and Community Health