MEMORANDUM

To: PCC

From: Ken Katkin, Chair

Re: Tenure During Phased Retirement – Faculty Handbook Amendments

Date: September 14 2017

In the recent past, questions have arisen as to whether faculty currently in the phased retirement program (PRP) can serve on RPT committees.   The current language of the NKU Faculty Handbook precludes this because it requires faculty to relinquish tenure at the time they enter the PRP.   Last fall, PCC considered a proposal to amend the language of the faculty handbook to postpone the relinquishment of tenure until the end of the PRP period, rather than the beginning.

On October 6, 2016, the PCC discussed the matter and delayed the vote until its next meeting. The following summary of PCC's discussion appears in the Minutes for the October 6 meeting.

> The NKU Faculty Handbook currently provides that faculty members undergoing phased retirement must give up tenure at beginning of retirement. The Handbook also states that only tenured faculty members may serve on promotion and tenure committees. Accordingly, faculty members undergoing phased retirement do not ordinarily perform committee work or serve on promotion and tenure committees. However, in some small departments it is difficult to constitute an appropriate RPT committee without including faculty members in phased retirement.
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> The Provost initially suggested that the Handbook be modified to provide that faculty members undergoing phased retirement agree to give up tenure at the end of the phase, but retain tenure status and rank during the phase. Some faculty members, however, expressed a preference not to serve on RPT Committees during the period of phased retirement. In response, the Provost then suggested that faculty members be allowed individually to choose whether to relinquish tenure at the beginning of the phase and thereby eschew committee service, or to retain tenure throughout the phase and thereby be eligible to be assigned to serve on RPT Committees. The Committee thought this was a good suggestion.   K. Katkin said he would redraft the proposal to reflect it.   A question then arose whether faculty members' rights to withdraw savings

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from TIAA-CREF retirement accounts during the phase would be affected by the retention of rank and tenure. Both the Provost and K. Katkin said that they thought this would not be a problem, but promised to check with Human Resources and then report back.   The item will be redrafted and brought back. S. **Neely made a motion to table the vote, seconded by K. Schwarz. All were in favor. Vote postponed to next meeting.**

Subsequently, NKU Senior Director of Human Resources Lori Southwood confirmed that "[t]enure status will not have an impact on the rules that govern drawdown of retirement funds." Moreover, the Minutes of the October 24 meeting of the Faculty Senate record that the following summary of PCC's deliberations on this issue was presented to full Faculty Senate:

> PCC will recommend a Handbook change that will allow faculty members to choose whether or not to retain tenure status during phased retirement. Faculty members who choose to retain tenure status will remain eligible to serve on RPT Committees during the phase.

However, it appears that this recommendation never actually came before PCC for a vote. There is no record of it in the minutes after October 24. Nor is it posted on the Faculty Senate website under the Senate Proposals Tracker.

At its meeting of September 7, 2017, PCC discussed this issue and expressed a consensus that tenure should be maintained by all tenured faculty members throughout the phased retirement program.   It was also agreed that the requirement for full-time status on RPT committees be removed.

Accordingly, I recommend that PCC consider recommending now that Faculty Senate adopt the attached proposal for Faculty Handbook Amendments, which we discussed favorably on October 6, 2016 and September 7, 2017.

Proposed Amendment to the NKU Faculty Handbook
Rationale: Language revised to clarify tenure relinquished at the end of the PRP

Current language reads:

10.3.3. APPLICATION

Eligible faculty who are interested in participating in the PRP may apply by forwarding to his or her department chair and dean a written request for consideration. The application must state clearly the proposed initial year of participation and the number of years of participation requested. Applicants may propose any of the following dates as the initial date for entry into the PRP: August 15 (academic Year), or July 1(fiscal year).

Applications must be accompanied by a signed letter stating that the faculty member agrees to relinquish tenure upon the effective date of participation in the PRP.

The deadline for filing applications for the PRP with the department chair, dean and program administrator is January 1 unless notice of a revised date is given.

Proposed language:

10.3.3. APPLICATION

An eligible faculty member who is who are interested in participating in the PRP may apply by forwarding to his or her department chair and dean a written request for consideration. The application must state clearly the proposed initial year of participation and the number of years of participation requested. Applicants may propose any either of the following dates as the initial date for entry into the PRP: August 15 (academic Year), or July 1(fiscal year).

Applications must be accompanied by a signed letter stating that the faculty member agrees to relinquish tenure.

The deadline for filing applications for the PRP with the department chair, dean and program administrator is January 1 15 unless notice of a revised date is given.

Tenure status will not have an impact on the rules that govern drawdown of retirement funds saved in TIAA accounts.

Proposed Amendment to the NKU Faculty Handbook
Rationale: Language revised to allow tenured faculty members to serve on RPT
Committees during phased retirement or part-time service.

Current language reads:

3.2.3. DEPARTMENTAL/SCHOOL COMMITTEE

Each department or school shall have a reappointment, promotion, and tenure (hereinafter, RPT) committee consisting of at least five faculty members elected at a regular or special department or school faculty meeting. If the department or school has five or more full-time tenured members in the case of a tenure committee or five or more members of appropriate rank (a rank above the level of the applicant) in the case of a promotion committee, then the committee shall be formed from faculty within the department or school. If the department or school has fewer than five fulltime, tenured members in the case of a tenure committee, or fewer than five members of appropriate rank in the case of a promotion committee, those members, in consultation with the department chair or school director, shall prepare a list of full-time, tenured faculty of appropriate rank from other departments or schools from which faculty will be appointed by the committee to fill out its membership. In choosing members from other departments or schools, preference shall be given to teaching faculty in departments or schools with affinity to the department or school.

The members of the committee shall elect their own chair. The committee chair shall notify the department chair or school director of committee membership within ten working days of election.

3.2.4. DEPARTMENTAL/SCHOOL COMMITTEE: ELIGIBILITY

All full-time, tenure-track faculty in the department or school are eligible to vote to elect the committee membership. Only full-time, tenured faculty may serve on the committee. The department chair or school director may not serve on the committee. Department chairs or school directors in other departments or schools, and assistant and associate deans with faculty appointments serving as administrators with reassigned time may serve on the committee. Tenured faculty with appointments in more than one department/school or discipline may serve on the committee of any department/school or discipline in which they hold appointment. Faculty on sabbatical or paid leave are eligible but not required to serve on the committee. Faculty on unpaid leave are not eligible to serve on the committee.

Upon agreement of RPT committee members, the department chair or school director, the appropriate dean, and the applicant, faculty external to the University and of suitable rank and tenure may serve on the committee. Persons holding full-time administrative appointments, as defined in Section 1.8.1 are not eligible to serve on the committee.

In departments or schools where no faculty members are eligible to serve on a needed RPT committee, the department or school faculty shall serve in place of the department or school committee members to elect suitable RPT committee members.

Proposed language:

3.2.3. DEPARTMENTAL/SCHOOL COMMITTEE

Each department or school shall have a reappointment, promotion, and tenure (hereinafter, RPT) committee consisting of at least five faculty members elected at a regular or special department or school faculty meeting. If the department or school has five or more ~~full-time~~ tenured members in the case of a tenure committee or five or more members of appropriate rank (a rank above the level of the applicant) in the case of a promotion committee, then the committee shall be formed from faculty within the department or school. If the department or school has fewer than five ~~fulltime,~~ tenured members in the case of a tenure committee, or fewer than five members of appropriate rank in the case of a promotion committee, those members, in consultation with the department chair or school director, shall prepare a list of ~~full-time~~, tenured faculty of appropriate rank from other departments or schools from which faculty will be appointed by the committee to fill out its membership. In choosing members from other departments or schools, preference shall be given to teaching faculty in departments or schools with affinity to the department or school.

The members of the committee shall elect their own chair. The committee chair shall notify the department chair or school director of committee membership within ten working days of election.

3.2.4. DEPARTMENTAL/SCHOOL COMMITTEE: ELIGIBILITY

All ~~full-time,~~ tenured and tenure-track faculty in the department or school are eligible to vote to elect the committee membership. Only ~~full-time,~~ tenured faculty members may serve on the committee. The department chair or school director may not serve on the committee. Department chairs or school directors in other departments or schools, and assistant and associate deans with faculty appointments serving as administrators with reassigned time may serve on the committee. Tenured faculty with appointments in more than one department/school or discipline may serve on the committee of any department/school or discipline in which they hold appointment. Faculty on sabbatical or paid leave are eligible but not required to serve on the committee. Except for faculty members in phased retirement, faculty on unpaid leave are not eligible to serve on the committee.

Upon agreement of RPT committee members, the department chair or school director, the appropriate dean, and the applicant, faculty external to the University and of suitable rank and tenure may serve on the committee. Persons holding full-time administrative appointments, as defined in Section 1.8.1 are not eligible to serve on the committee.

In departments or schools where no faculty members are eligible to serve on a needed RPT committee, the department or school faculty shall serve in place of the department or school committee members to elect suitable RPT committee members.

ADDENDUM

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From: Kenneth Katkin <katkink@nku.edu>
Sent: Thursday, October 6, 2016 10:10 PM
Subject: Question About Impact of Tenure Status on TIAA-CREF Drawdown During Phased Retirement
To: Emily Sumner <sumnere1@nku.edu>
Cc: Matthew Zacate <zacatem1@nku.edu>, Michael Baranowski <baranowskim@nku.edu>, Sue Ott Rowlands sottrowlands@nku.edu

Ms. Sumner----

In cooperation with the Provost, the Professional Concerns Committee of the Faculty Senate is looking into some possible proposed changes to the Phased Retirement Program for faculty members. One change being proposed would be to allow a faculty member undergoing phased retirement the choice of either relinquishing or retaining their status as tenured faculty members during the phase. Although both the Provost and the Professional Concerns Committee tentatively would like to support this proposal, concerns have been raised that tenure status might have an impact on the rules that govern drawdown of retirement funds saved in TIAA-CREF accounts. Is this true? Is this something we need to be aware of, or to take account of? Any advice would be appreciated.

Best,
--Ken Katkin, PCC Chair (2016-17)

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From: Lori Southwood
Sent: Thursday, October 13, 2016 10:05 AM
To: Kenneth Katkin <katkink@nku.edu>; Sue Ott Rowlands <sottrowlands@nku.edu>
Cc: Emily Sumner <sumnere1@nku.edu>
Subject: RE: Question About Impact of Tenure Status on TIAA-CREF Drawdown During Phased Retirement
Ken—
Tenure status will not have an impact on the rules that govern drawdown of retirement funds saved in TIAA-CREF accounts.

Lori

To: PCC
From: Prof. John Farrar, PCC Secretary
Re: NKU Policy on "Information Security Policy"
Date: September 14, 2017

Summary of Current Policy
The current Information Security policy has several concerns for faculty and staff at NKU. The policy states that "each member of the NKU campus community is *personally* responsible for the security and protection of NKU information and data sources over which he or she has *access, use, and/or control*, and must adhere to the Acceptable Use Policy." Emphasis added.

The current IS policy categorizes data as confidential (highest, most sensitive), private data (moderate level of sensitivity), and public data (low level of sensitivity). The protection of confidential data is required by law, such as FERPA, HIPAA, etc., and access to confidential data is limited to "only those individuals designated with approved access, signed non-disclosure agreements, *and* a need-to-know." These types of data include student education records (addressed as "student academic information such as grades or GPA, etc."), individual health records, human subjects research data, prospective students, and other data as expected (credit card information, SSN, classified information).

Private data is protected according to contractual obligation and includes research data that is not confidential, information in non-disclosure agreements, and proprietary information. Access is limited to NKU employees and non-employees who have a business need-to-know.

Public data is governed by the Kentucky Open Records Act and is unrestricted.

Protection measures for confidential and private data to be used include
1. "Use Encryption for Laptops: All NKU owned laptops will be encrypted."
2. "Store Data within NKU Networks" "Storing such data on *hard drives (laptops, desktops, tablets, etc.)* can subject the data to breach..."
3. "Use Virtual Private Network (VPN) to access data when not on campus (home, travel, etc.)
4. "A secured login must be used when leaving your device unattended. (i.e. When leaving your computer unattended, you must lock your screen and require login to re-access)
5. "Do dispose of non-permanent confidential and private data as soon as possible according to the State University Model Records Retention Schedule to reduce risk and potential liability."
6. "Do require personnel handling confidential or private data to sign non-disclosure statements."
Furthermore, the use of cloud or third-party data services such as Google Docs, Dropbox, Amazon, or iCloud is prohibited for confidential or private data. Microsoft OneDrive is the only cloud-based storage service that is approved. The use of thumb or flash drives are prohibited when storing confidential or private data, unless the device or data has been encrypted.

Penalties for violation of the policy include possible dismissal or legal action. The user found in violation may be "held personally responsible for any fees, charges or other costs to recover from incidents, including fraud protection for breach of information."

Concerns
The current policy as written makes it virtually impossible for any employee to comply. Training for the use of approved protection measures has been lacking, and the individual employee, even those who are tech-savvy, likely don't know about encryption of their devices and data.

1. Making the employee personally responsible for the security and protection of NKU information and data sources over which they have access, use, or control is unreasonable. As a faculty member, I have access to huge amounts of data on mynku. How can I be expected to make that data secure and be sure that it is protected?

2. The policy is inconsistent. There seems to be much concern about data stored on laptops, desktops, and mobile devices. However, the policy declares that "confidential and private data should be stored on the NKU file server network or MS OneDrive service." While this MAY improve security, it also requires that data be transferred over VPN. What if a VPN is not available? VPN is notoriously slow and will exacerbate problems on slow networks. In addition, a network may not even be available. Not allowing data storage on devices means that work will stop or be impossible in situations without a network.

3. Are all NKU laptops encrypted? How is the faculty member to know? What about other devices? NKU seems to be moving toward a BYOD model. How will encryption work with devices that are not NKU owned?

4. Requiring that the device be locked when the device is unattended is a burden and is not well defined. Unattended for how long? If I step out of my office to warm up lunch around the corner, is this unattended? If I go to the restroom? If the device is left in a locked private office, does this apply? What about podium computers in a classroom used for collecting student lab data?

5. According to the policy, confidential data should only be accessed by individuals with approved access, a signed non-disclosure agreement, AND a need-to-know. How is need-to-know defined? Do all faculty and academic staff have signed non-disclosure agreements on file? Who tracks this and who is responsible for making sure that these agreements are maintained? I wonder how many faculty on campus currently meet all three requirements to access data on campus.

6. What is the definition of student academic records? Various FERPA trainings define this in a multitude of ways, from any student work that has been graded or commented on, to only include GPAs and final grades.

7. Have all faculty and academic staff been trained to use the required technology—VPN, encryption, OneDrive, etc.? Have they been trained on the Record Retention schedule?

8. Why is MS OneDrive considered more secure than Google, Amazon, DropBox, and the others?

9. What is the due process for determining the appropriate disciplinary action?

10. How is it reasonable for an NKU employee to be held *personally* responsible for any costs of a breach of information?

11. Has training and education been mandated for NKU employees on proper implementation of this policy?

12. The current password policy is outdated and promotes making them LESS secure. Requiring complicated passwords that frequently change leads people to try to simplify

them—for instance making only the most minor of changes (only enough to satisfy the algorithm, such as changing to the next special character on the keyboard), and they respond by writing down the password.

This policy encompasses items as diverse and fundamental as proper use of email and passwords to complex items like FERPA and encryption. Even fundamental uses are frequently misunderstood. It is not reasonable to expect the average employee to be able to understand and follow this policy without significant time for training and education. In addition, the risks and liabilities for the individual are relatively high.

Indeed, the policy has proved so unworkable that the majority of campus essentially ignores it. Those who understand what the policy is requiring also appear to recognize that it can't be implemented as is. The response is to make simple changes, such as switching to OneDrive (as I have), but to ignore the more onerous requirements. I have asked if my laptop is encrypted, for instance, but no one seems to know the answer.

In conclusion, an Information Security Policy is required, but the current iteration of the policy seems unworkable and overly restrictive. There must be a balance between reasonable security measures and accessibility of data. While all data COULD be locked down to be mostly (not entirely) secure, there is a productivity and convenience cost. This cost to individuals across campus has not been justified in the current policy, and the measures required by the policy have too high a burden (even unknown in some cases) to the employee without the IT support necessary to implement them.

To: Chief Information Officer, Office of Information Technology
From: Prof. Ken Katkin, PCC Chair
Re: NKU Policy on "Information Security Policy"
Comments Filed: June 6, 2016

I am the Chair of the Professional Concerns Committee (PCC) of the NKU Faculty Senate. Neither the PCC nor the Faculty Senate meet over the summer. I have not conferred with any other member of the PCC before filing these comments. Accordingly, the following comments represent only my own views. However, I intend to disseminate these comments to the incoming PCC Members in advance of our first meeting in Fall 2016.

I offer the following comments on the draft Policy proposal entitled "Information Security Policy."

(1) On Page One and Page Five, the draft policy cross-references another NKU Policy entitled "Acceptable Use Policy." However, the hyperlink in the cross-reference is dead, making it difficult for the reader to locate the "Acceptable Use Policy" being cross-referenced.

(2) On Page Two, the second bullet point contains a reference to "HIPPA." This reference probably refers to the Health Insurance Portability and Accountability Act of 1996, which is properly abbreviated "HIPAA."

(3) On Page Three, the data classification table adopts a definition of "public data" that places excessive and undesirable restrictions on the use and dissemination of such data. In order to preserve the open information sharing requirements of NKU's academic culture, to protect the freedom of speech of all NKU community members, and to comply with the letter and spirit of Kentucky's Open Records Act, the following revisions to the draft language in the "public data" column are needed.

      (a) In the current draft, "access" to "public data" is limited only to "NKU affiliates and general public with a need-to-know." This language raises the possibility that an NKU community member could be disciplined for sharing public data with someone who does not have a "need-to-know." By definition, "public data" should be available to the public, without any threshold need to demonstrate any need-to-know. See Ky. Rev. Stat. § 61.872(2) ("Any person shall have the right to inspect public records."). The language describing who is entitled to have "access" to "public data" should therefore be amended to simply read: "unrestricted."

      (b) In the current draft, the language describing "legal requirements" of "public data" seems not to comply with the presumption of openness set forth in the Kentucky Open Records Act and in the University's own stated commitment to preserve the open information sharing requirements of NKU's academic culture. As drafted, this policy language states that protection of public data "is at the discretion of the owner or custodian" of the data. This language seems to

imply that the owner or custodian of public data has discretion to withhold public data from the public. The Kentucky Open Records Act, in contrast, codifies into Kentucky law the policy "that free and open examination of public records is in the public interest and the exceptions provided for by KRS 61.878 or otherwise provided by law shall be strictly construed, even though such examination may cause inconvenience or embarrassment to public officials or others." Ky. Rev. Stat. § 61.871. In most instances, therefore, if an NKU owner or custodian were to exercise "discretion" to deny access to public data, such an exercise would violate the Kentucky Open Records Act.   To resolve this problem, the language describing the "legal requirements" of "public data" should be amended to read: "is governed by the Kentucky Open Records Act, KRS §§ 61.870 to 61.884."

(c) In the current draft, the list of "examples" of "public data" seems misleadingly restrictive, in that all but one example concerns material that the University voluntarily publicizes through its Web Site.   In fact, however, the category of "public data" includes all institutional data that is not "confidential data" or "private data," including a great deal of data (such as salary data) that is not routinely or voluntarily posted on University Web Sites.   The Kentucky Open Records Act defines "public records" as "all books, papers, maps, photographs, cards, tapes, discs, diskettes, recordings, software, or other documentation regardless of physical form or characteristics, which are prepared, owned, used, in the possession of or retained by a public agency," Ky. Rev. Stat. § 61.870(2), except those that fall within a specific exception set forth at Ky. Rev. Stat. § 61.878. To avoid creating the misleading impression that "public data" is limited only to categories of information that the University chooses voluntarily to publicize, an additional bullet point should be added to the list of examples, which would read: "all institutional data made available to the general public by the Kentucky Open Records Act."

(4) On Page Three, the three sub-bullet points at the bottom of the page each contain misleading, unclear, or unhelpful examples.   In particular:

(a) In the draft policy, examples of "confidential data" include "student academic information such as grades or GPA, etc."   Under the Kentucky statute on Personal Information Security and Breach Investigations being implemented by this policy, in contrast, such "personal information" is confidential only where it includes unique individual identifying information such as "an individual's first name or first initial and last name; personal mark; or unique biometric or genetic print or image." Ky. Rev. Stat. § 61.931(6); see also Ky. Rev. Stat. § 61.878(2) ("No exemption in [the Kentucky Open Records Act] shall be construed to prohibit disclosure of statistical information not descriptive of any readily identifiable person."). At NKU, it is relatively common practice for summary grading data to be disseminated in ways that identify the professor and the course, but not the students.   Such information dissemination is valuable, is not prohibited by Kentucky law, and should not be discouraged by this policy.

(b) In the draft policy, examples of "private data" include "academic reports, research data, technical reporting such as system logs, faculty tenure evaluations, etc."   As discussed above, most items on this list are properly classified as "public records" unless some specific exception to the Kentucky Open Records applies.

(c) In the draft policy, examples of "public data" include "campus promotional materials, class schedules, catalog information, annual reports, press releases, directory information, etc." Because every item on this list is a form of institutional data that the University voluntarily chooses to disseminate, the list creates the misleading and false impression that no institutional data can qualify as "public data" unless the University voluntarily decides to disseminate such data. As discussed above, the Kentucky Open Records Act provides a much larger and more inclusive definition of "public information" that specifically includes information whose dissemination "may cause inconvenience or embarrassment to public officials or others." Ky. Rev. Stat. § 61.871.

Because these three bullet points are both misleading and unnecessary, I recommend that they simply be deleted. The reader can rely on the Table that appears on the same page for examples, if necessary.

(5) It is unclear whether the data security "do's and don'ts" set forth on Pages Four and Five of the draft policy are intended to apply to the process of calculating student grades that is routinely performed by individual faculty members. Such application would be burdensome and cumbersome for many faculty members, and is not contemplated by FERPA or by Kentucky Law. Indeed, neither FERPA, nor the US Department of Education regulations that implement FERPA, require any data security standards whatsoever. See 20 U.S.C. § 1232g; 34 C.F.R. Part 99. Rather, FERPA requires only that NKU must not have "a policy or practice of permitting the release of education records . . . without the written consent of their parents. . . ." 20 U.S.C. § 1232g(b)(1). Similarly, the US Department of Education regulations that implement FERPA require only that "[a]n educational agency or institution that does not use physical or technological access controls must ensure that its administrative policy for controlling access to education records is effective. . . . " 34 C.F.R. § 99.31(a)(1)(ii). In addition, the Kentucky statute on Personal Information Security and Breach Investigations that is being implemented by this policy specifically EXCLUDES educational records from its coverage. See Ky. Rev. Stat. §61.931(6)(f) ("Personal information" means an individual's first name or first initial and last name; personal mark; or unique biometric or genetic print or image, in combination with . . . individually identifiable health information . . . EXCEPT FOR EDUCATION RECORDS COVERED BY the Family Educational Rights and Privacy Act, as amended, 20 U.S.C. sec. 1232g.") (emphasis added).

Moreover, professors' gradebooks—including electronic gradebooks saved as files in programs such as MS EXCEL—are not "education records" under FERPA. See 34 C.F.R. § 99.3(b)(1) ("The term 'education records' does not include: Records that are kept in the sole possession of the maker, are used only as a personal memory aid, and are not accessible or revealed to any other person except a temporary substitute for the maker of the record."). Rather, as the United States Supreme Court explained in 2002, students' grades first become "education records" only when they are submitted to the registrar, and not earlier:

> FERPA requires "a record" of access for each pupil. This single record must be kept "with the education records." This suggests Congress contemplated that education records would be kept in one place with a single record of access. By describing a "school official" and "his assistants" as the personnel responsible for

the custody of the records, FERPA implies that education records are institutional records kept by a single central custodian, such as a registrar, not individual assignments handled by many student graders in their separate classrooms.

Owasso Independent School Dist. No. I-011 v. Falvo, 534 U.S. 426, 434-35 (2002).

As drafted, the data security "DO'S & DON'TS" set forth on Pages Four and Five of the draft policy might be construed to prohibit NKU faculty members from calculating student grades for particular assignments on their own home computers, or from using email or a flash drive to transfer worksheets containing such calculations back to their office computers. While ideally all NKU faculty members will one day receive training and technology that will facilitate the use of more secure solutions at all times, this is not the case today. Accordingly, the draft policy should be revised to clarify that professors' individual gradebooks or grading worksheets are not covered by the policy unless they are also covered by FERPA.

(6) On Page Five, the draft policy threatens that faculty members found to have violated this policy may be subject to termination of employment. The draft policy does not address the procedures by which guilt might be assessed or penalties meted out. To avoid any ambiguity, I recommend adding language clarifying that:

Such penalties shall be levied through ordinary disciplinary procedures set forth in other official University personnel policy documents, such as the NKU Personnel Policies and Procedure Manual, the NKU Faculty Policies and Procedures (the "Faculty Handbook"), or the Chase College of Law Faculty Policies and Procedures (the "Chase Faculty Handbook").

Thank you for taking these comments into consideration.

Best,
--Ken Katkin, PCC Chair (2015-16 & 2016-17)
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