Thank you for the opportunity to offer public comment to the full commission. Clearly much work has been done.

I would like to offer five big take-aways (and warnings) on the work so far as this commission enters its next stage.

1. This process is setting out a path that will likely create a very complicated formula! There is value in simplicity that will help ensure that the formula is both transparent and useful.
   a. The president from Lafayette was correct to mention complexity as a problem.
   b. The length of the adequacy workgroup presentation today to my mind was not derived from presentation style, but rather reflects the complexity of the model being presented.
2. There is not enough guidance from the Adequacy and Resources working groups for the Technical work group. The lift being asked of the Technical workgroup is large. The work remaining to be done will need to include both value judgements and work on identifying specific measures. So, the task is beyond straightforward technical modeling.
3. The notion of stability of funding does not seem to have been meaningfully addressed to-date.
4. It does not feel like equity is at the heart of the proposed model. To my mind, the value of equity is being subsumed by adequacy and complexity in the formula, which does not match with the stated value that the commission has placed on equity.
5. The information passed off to the technical workgroup does not do enough to value mission differentiation across institutions.

Elements of the current model make me feel like the commission is “putting a round peg in a square hole” as described as President Glassman at the Nov 17 Resources Workgroup meeting. These comments reflect prior comments I offered to the workgroups:

1. The use of adequacy as a conceptual frame.
   a. It is not clear that the proposed approach is an improvement upon the current approach that we have taken in setting budgets in recent years, which uses Pell weights to allocate funding increases across institutions (not using across the board increases).
   b. It is not clear why this is needed as opposed to a funding formula like the one in LA that predominately uses a base plus enrollment with some performance measures as an allocation mechanism. The LA model includes incentives for serving particular vulnerable categories of students. I do not want to hold up the LA model as an ideal one nationally, but rather to use the testimony from the presidents we heard today to reflect on an alternative model and in particular to
reflect on the use of enrollment-based measures, targeted funding for vulnerable student populations, and incentives for specific areas such as research.

2. The equal weighting of state resources and tuition resources in “filling the bucket” to meet adequacy.
   a. These two funding streams are not equal from the point of view of students and families.
   b. There are large implications for affordability in treating these two revenue streams equally to be able to meet “adequacy targets”.

3. The reliance on institutional spending and costs.
   a. This feels a lot like being one step away from micromanagement.
   b. It is not clear that this approach is necessary to produce a funding formula.

4. Calculations of “expected tuition”.
   a. Expected UIF feels a lot like being one step away from price controls.
   b. Tuition flexibility is vital for institutions to be able to weather economic downturns in the state.
   c. It is not clear that this approach is necessary to produce a funding formula.