

ILLINOIS COMMISSION ON EQUITABLE PUBLIC UNIVERSITY FUNDING

Draft Final Report Feedback

Instructions

1. Complete the following two sections accordingly:
 - a. The General Comments section addresses issues that may apply to more than one section of the report or to issues not currently covered in the report.
 - b. The Specific Comments section should include comments directed at a particular section or wording of the report. These might be suggested line edits or new language, for example.
2. In the specific comments section, indicate any page numbers and/or sections related to the comment.
3. In both sections, describe in a few words the topic your comment addresses in the "Topic of Comment" field.
4. Record your comment/feedback in the "Comment" field.
5. If additional comment space is needed, right click in any row and select "insert" > "insert rows" to add an additional row(s). Additional rows can be added at the bottom of the table or in between rows.
6. Save your document and email to **Katie Lynne at katie_lynne_morton@hcmstrategists.com**. **All final comments are due by 5pm CT on February 20, 2024.**

General Comments

Topic of Comment	Comment
Unadjusted physical plant costs	The lack of equitable adjustment for physical plant costs is still a concerning part of the model because there is no recognition of equity - that universities that have larger campuses to maintain likely had more resources to expand, and therefore will have more ability to maintain them. This isn't just theoretical, since one of the first things people mention when talking about underfunding universities are broken sidewalks and non-functional facilities, and they're not talking about the larger campuses.
Clarity on whether including MAP in ESS would undermine affordability	<p>I agree with MAP not being included in ESS, but wonder if the explanation for why is fully correct, and it's important to get it right in this explanation. The text on page 29 implies that if MAP is included in ESS calculations, it would improve affordability for students, and I wonder if that's true.</p> <p>If I'm understanding it correctly, subtracting additional MAP investment from an institution's adequacy target will, instead of lowering the cost for students, just shift the burden to pay from the state onto students (while giving them more money to pay that obligation). Thus, it would undermine legislators' intentions in increasing MAP, that it effectively improves affordability.</p> <p>For example, let's assume that a university will receive its full adequacy target over time, and they plan to use that to equitably make it \$1,000</p>

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	<p>more affordable for students on average. Further, let's say it would cost \$10 million to do so, and they'd spend the rest of their adequacy target on student supports, etc. if we consider MAP in ESS, a \$10 million increase in their MAP funds would increase the ESS and decrease the adequacy target by the same amount. With their adequacy target now \$10 million lower, they would need to use all of the \$10 million in additional MAP revenue to spend the same amount they would have spent on student supports, and would have to forego their own \$1,000 planned student discount. So in all, they would not be able to lower their costs to students any more than if MAP had never been increased.</p> <p>Thus, including it would result in a 100% tax against institutions for every dollar added to MAP, and in doing so would hamper institutional flexibility and eliminate the additional incentive to enroll students with fewer resources.</p>
Guardrail adjustments being misconstrued as essential model components	<p>Any across-the-board increase is counter to the spirit, if not the letter of the legislation. The Governor's Office said as much in a recent Commission meeting, too.</p> <p>There's also the question of why the inflation guardrail is needed if this formula already accounts for inflation in costs (p. 38)?</p> <p>We acknowledge that institutions flagged it as important in meetings, but don't understand how it prioritizes equity or adequacy and think it's misleading to characterize it that way. Across-the-board funding is counterproductive to equity and adequacy as defined by the formula, and the arguments for it didn't refute that -- they centered more around "fairness" and stability.</p> <p>If the guardrail is going to be included we'd like to see a justification for it that speaks to the legislation (the stability arguments start to get at that), a clear indication that this concern is secondary to the Commission's focus, and it would be helpful to note the faster the legislature fully funds the formula, the less this guardrail is needed.</p>
Medical School ESS appears to be underestimated	<p>We're a little confused about the assumptions around what's "reasonable" and "affordable" for medical students, as discussed on page 43. For reference, non-resident tuition and fees at UIC medical school is currently \$86,700. That's a lot of money, but for a wealthy medical student, it is not necessarily more unreasonable or unaffordable than \$10,000 would be for a low-income undergraduate student.</p> <p>In holding ESS to \$45,000-\$60,000, Are we saying that we need to be providing out-of-state medical students with \$25,000-\$40,000 in additional subsidies? I can understand large subsidies to get more doctors of color and from low-income backgrounds to and through our medical schools, but this subsidy appears to apply to all medical</p>

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	students. Unless I'm missing something, I'm not sure how/why this arbitrary additional subsidy was added.
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Specific Comments

Page Number, Paragraph, Section, etc.	Topic of Comment	Comment
P. 2 paragraph 1	Framing	It might be worth framing that this funding is not just an increase, it's a restoration – considering inflation, the state once funded its universities about this much.
P. 2 paragraph 1	Framing	We shouldn't frame equity as just being "adjustments" -- yes, it is technically adjusting the formula, but its purpose is to bring equity to enrollment and completion
p. 17 paragraph 1	Wording	Hospitals, athletics, etc. were not included mostly because we don't have the data/information to do so, not just that they're too complex

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P. 22 paragraph 6 (under "Purpose" of High-Cost Factors)	Missing context	It's important to note that a greater subsidy to high-cost programs comes at the expense of lower-cost programs, and that every institution underrepresents Black and Latinx students in high-cost programs relative to their total undergraduate populations. So a greater subsidy would effectively shift funding away from students of color. This is true regardless of the diversity in high-cost programs adjustment, and was specifically raised by members of the Commission.
p.23 paragraph 1	Missing context	It would be good to add (and was brought up in the Commission) that the effects of this go beyond higher ed -- health outcomes for people of color are negatively affected by underrepresentation in the medical field.
Page 24 Paragraph 2	Missing Context	This is all true. However, this isn't just a technical tweak for the model to work; we must acknowledge the historical inequities that have led to this point. Most small schools are that way because they've lost enrollment over the years, as the state has disinvested and they've had to raise tuition to make up for it. This has worked out better for larger schools, which offset these costs by enrolling more out-of-state full-paying students, whereas regional universities that enroll greater percentages of in-state students, students of color, and students from low-income backgrounds saw those students priced out at greater rates. Thus, this adjustment is about both equity and efficiency.
Page 25 paragraph 4	Missing context	The focus on undergraduates v. graduates is also a data quality issue -- we have less ability to determine what a low-income graduate student is, and their subsidy levels are less clear cut (they may offset tuition with graduate assistantships, for example).

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Page 25 paragraph 4	Misleading context	Institutions can continue to recruit out-of-state students period -- there is no tax or penalty for doing so, and we shouldn't imply anything different.
Page 34 paragraph 2	Misleading context	Commission members have posed this framing of needing a guardrail for the hold harmless and to keep tuition level, and we've worked on solutions for it, but I believe the language of "the state must provide" misrepresents this as an SB815 goal, when it's not. SB815 says we must consider a hold harmless, with no mention of inflation. Further, it does not say to hold tuition flat (which is different than keeping costs equitable and affordable). We applaud institutions for working hard to keep tuition level, but it is beyond the scope of this legislation and should not be misconstrued as a core goal, even if a guardrail ends up as a part of the model.
p. 34 last paragraph	Misleading context	It says "other Commission members expressed concern..." but I would think these were the same Commission members mentioned in the previous sentence, and don't want the false impression that there was consensus for including the guardrail adjustment.
Page 37 paragraph 1	Missing/misleading context	It is directly stated in the SB 815 legislation that equitable funding in a cut scenario must be considered, but not the guardrail approach to additional funds. I think the text should reflect that -- currently, it appears that both were called for by the legislation.
Page 37 paragraph 2	Missing suggestions from Commission	It has to be mentioned here that others in the TWG expressed the opposite -- that in a heavy cut scenario it's more important to equitably distribute those cuts, not less. Capping the percentage cut means shifting it to institutions that by definition are further from adequacy, and are less able to sustain cuts.

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Page 38 paragraph 3	Missing context	Our core accountability goals also include expanding equitable access by race, income, etc. and that should be mentioned here as well.
Page 38 paragraph 3	Framing	At the risk of copyediting, I hope that this accountability brings assurance, and that we don't need to qualify that with "some"
Page 41 Paragraph 2	Missing accountability explanation	It's important to note that there are racial disparities in enrollment for each school of medicine relative to its undergraduate population, which they should be expected to close with additional funding.
Page 41 Paragraph 4	Missing data/information	I'm not sure why the counterpoint about a \$1 million donation affecting the distribution by only \$100 (or 0.01%) is not included in here, as it is just as relevant of a concern and is backed by calculations.
Page 42 Paragraph 3	Possible error	Is it that they spend less than \$1 million or have less than \$1 million in endowment? These seem to be pretty different to me.