

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
Equitable Student Share Label	In the figures we may want to shift the text from simply stating "Equitable Student Share" to "Equitable Student Share – Reasonable Amount of Tuition and Fees"
Low-Income Identifier	When referring to students from low-income backgrounds, and when not referring to a specific data point, can we reference both Pell/MAP? Only referring to Pell could limit how this is operationalized and does not include undocumented students.

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Referencing Other States	When discussing the model output (pages 31-32) and where appropriate it may be helpful to acknowledge that the recommended per-student amounts are higher than most other states in the Midwest and similar to what the research says that high-performing universities spend on a per-student level to level set.
Inflation	<p>This is addressed in various sections but we think it would be helpful to explicitly include how this model addresses inflation – it is 1) built into the adequacy target and 2) incorporated into the allocation model.</p> <p>It might also be helpful to include the projections of inflation over the next 10 years as a footnote.</p>
Review Bodies and Advisory Committees	Throughout the report can we ensure that we are clear about the three different bodies that are being proposed. All three serve different purposes but are critical to keep this work moving forward. 1) IBHE Accountability and Transparency Committee 2) Formula Upkeep Committee 3) Formula Accountability and Transparency Committee

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Specific Comments

Page Number, Paragraph, Section, etc.	Topic of Comment	Comment
Page 2 Paragraph 1	Introduction	<ul style="list-style-type: none">• We should acknowledge the decades of disinvestment from the start. “After nearly two decades of disinvestment, the state has changed course and made historic investments. . .”• “The remainder of the gap. . reducing the amount expected from student’s tuition and fees and greatly. . .”• “The \$150M investment would build on the significant. . .”
Page 2 Paragraph 2	Introduction	<ul style="list-style-type: none">• Would want to add a note about the FY. “As of FY XX, universities currently rely on tuition revenue for \$2.1 billion. . .”• Can we include a simple bar graph to show the change in responsibility between students and the state?
Page 4	Understanding the Need for a More Equitable Illinois	<ul style="list-style-type: none">• “The Commission’s work is driven and informed by the deep and persistent gaps that exist across the full postsecondary continuum in educational access and attainment that exist across geography, race, and ethnicity and income.”• Rural adults are less likely to have a bachelor’s degree but more likely to have

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		<p>an Associate's or some college than adults from non-rural areas. Overall, college attainment rates are lower for rural adults (32.8%) compared to non-rural adults (45.7%)</p> <ul style="list-style-type: none"> General note about this section – is it possible to structure each section by highlighting the gaps at each point of the continuum for each group? (Enrollment, Retention, Graduation, and Overall Attainment)
Page 5	Understanding the Need for a More Equitable Illinois: Race and Ethnicity	<ul style="list-style-type: none"> Is it possible to frame gaps as not only against White students, but vs the overall, statewide value as well?
Page 6 Paragraph 1	Graduation Rate	<p>“Gaps in enrollment, retention, and graduation exist for low-income students as well.”</p>
Page 9 Paragraph 3	Adequacy vs. Performance-Based Funding	<p>Can we include a couple of sentences on the explicit decision to move away from performance-based funding and cite in a footnote the research that was brought to the group that highlights how ineffective performance-based funding is?</p>
Page 10 Paragraph 2	Resource Workgroup	<p>Can we define Other Resources in this category? “Other resources include endowments, private gifts and grants, line-item appropriations, etc.”</p>

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Page 11 Paragraph 2 Paragraph 4	State Investment	<ul style="list-style-type: none"> “Since then, inflation has slightly outpaced tuition increases as federal appropriations to universities increased dramatically during the COVID-19 pandemic, but tuition remains. . . “ Would it be possible to show the decrease in enrollment at all institutions to visualize this?
Page 12 Paragraph 3	Overall Framework	<ul style="list-style-type: none"> Can we reference the fact that these equity adjustments were rooted in research? “Equity adjustments are made to the targeted base on different levels of student needs as evidenced by state data and costs rooted in research, to achieve. . . “
Page 14 Paragraph 3	Equitable Funding	<ul style="list-style-type: none"> ‘The formula includes nearly \$800M in the cost. . .’ <ul style="list-style-type: none"> Can you reference Table E-5 here so that the reader can note what types of programs this could support?
Page 15 Paragraph 2 Paragraph 4	Affordability	<ul style="list-style-type: none"> (2) It seems important to note that the current recommendation would be yearly increases in institutional funding which institutions can count on year over year. (4) I worry about the word “hypothetical” when we are referring to ESS. Could we switch “estimated” or “calculated” - “Under the formula equitable student share is the hypothetical dollar”
Page 16 Paragraph 4	Adequacy	<ul style="list-style-type: none"> Can we include either an example or a footnote about what are some examples of student-centered access and academic supports on this first page where we introduce the terms? It is referenced on page 17 but I think it may be helpful to include it sooner for the reader. One or two examples would suffice.

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		<ul style="list-style-type: none"> • Student Centered Access (i.e., Summer Bridge Programs), Academic Supports (i.e., Learning Communities), Non-Academic Supports (i.e., career services).
Page 17 Paragraph 3	Approach to Defining Adequacy	<ul style="list-style-type: none"> • “The overall increase in spending. . . “ <ul style="list-style-type: none"> ○ What was the overall increase in spending from the equity adjustments? Can you lay that out more clearly?
Page 19 Paragraph 1	Graduate/Professional Students	<ul style="list-style-type: none"> • In addition to suggesting the formula review process look for opportunities to update graduate student adequacy calculations, we might want to suggest that IBHE or a designated group continue to work on this element as a follow-on to the work of the Commission.
Page 20 Table 2	Access Equity Adjustment Tiers	<ul style="list-style-type: none"> • Can we make this table clearer re: what it is telling us? For example, we might include “Statewide 4YR College Going Rate Gap of Recent HS Graduates” • Can we also include what the statewide average is?
Page 21 Table 3	Holistic Supports Equity Adjustment Tiers	<ul style="list-style-type: none"> • Similar to Table 2 – can we be clearer in what this is showing “Statewide Retention Gap of First Time Full Time Students” • Can we also include the statewide retention number?

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Page 22 Paragraph 1 Paragraph 2	Equity Adjustments	<ul style="list-style-type: none"> • (1) Can we include a citation to some of the K-12 research? • (2) - “This would partially account for the expense of offering . . .”
Page 23 Paragraph 2 Paragraph 5	Mission/O&M	<ul style="list-style-type: none"> • (2) Can Mission be broken down into the same categories as the others – Eligibility/Amount/Rationale? • (5) Can Operations and Maintenance be structured in the same way? Maybe instead of eligibility we use the word “Criteria”. Also we explain where the base cost was derived for the other categories but not this one? Can that be explained in this section as well?
Page 24 Paragraph 4	O&M	<ul style="list-style-type: none"> • Physical plant – same comment as above please include eligibility/amount/rationale or purpose. Also noting that for some adequacy components, there is a “rationale” versus a “purpose” it may be helpful to streamline this section. • Resources - “In building the framework for the Resource Profile, the Commission sought to evaluate the resources institutions have available to meet student needs through the lens of equity, considering how they influence an institution’s ability and capacity to equitably serve students.” • (last paragraph) “Equitable Student Share represents the student contribution, a calculated hypothetical level that represents a reasonable and affordable amount of tuition and fees institutions should be generating in-tuition-and-fees based on their specific student body.”

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Page 26 Example 3	ESS Index Calculation	<ul style="list-style-type: none"> The example is confusing because in the paragraph above it states that out-of-state undergrads can receive a maximum additional 25% subsidy, whether they are URM students, low-income or both.” Is that in addition to their base subsidy? So the cap is 35% overall? Would help to clarify.
Page 29 Paragraph 2 Paragraph 4	ESS Index Subsidy Rate	<ul style="list-style-type: none"> (2) Can we include a footnote to discuss what the initial research/data (or lack thereof) showed for these student groups? (4) In a footnote can we provide examples of Mandatory Waivers?
Page 30 Paragraph 2	Other Resources	<ul style="list-style-type: none"> The Commission sought to understand how access to other revenue sources, including grants, contracts, and endowments, provide differential or inequitable capacity to institutions. At the same time, the Commission also recognizes that access to these resources varies widely across institutions and can impact equity At this point the reader doesn’t know what “option 1” is, so can we just state that “one of the three options was used for modeling – although that does not indicate a preference” (or something along those lines)?
Page 30 Paragraph 1	Summary of Formula Draft Report	<ul style="list-style-type: none"> “close to \$150 million - is a result of using the ESS to start to address affordability and to effectively shift from students to the state. . . “

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Page 32 Table 7	Share of Adequacy Target When Fully Funded	<ul style="list-style-type: none"> The state would be responsible for 57% of the total cost of adequacy, compared to 40% for students, and 3% from other institutional resources. Can we add column headers? One for per-student \$ and % of adequacy target funded by category? Can we add two more columns that include the “status quo” per student state appropriations, UIF, other resources as well as their corresponding %s?
Page 33 Paragraph 2	Share of Adequacy Target When Fully Funded	<ul style="list-style-type: none"> Can a brief explanation/footnote be included as to why ISUs current state appropriations are so low?
Page 34 Paragraph 5	Allocation Formula	<ul style="list-style-type: none"> Can we add the connection to the initial charge of the Commission - “Many on the Commission felt that the guardrail factor was an important way to prioritize equity and adequacy in allocating new stand funds and was true to the initial charge of the Commission.”
Page 35 Table 10	Allocation Formula	<ul style="list-style-type: none"> As was discussed in the 2/15 Commission Meeting, it would be helpful to include modeling and explicit descriptions of the full range of guardrail and guardrail factors that can be used in the model. For example, modeling a guardrail factor that would push more than 50% through the adequacy gaps. (Table 9) It may be helpful to have an example of how each the share of adequacy gap \$ and share of adequacy gap % is calculated using the model outputs from Table 8. This was done for the guardrail calculation and was helpful as a reader.

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Page 36 Paragraph 2	Allocation Formula	<ul style="list-style-type: none"> Can you include the modeling for both \$100M and \$135M in the appendix and reference that here?
Page 37 Paragraph 2	Allocation Formula	<ul style="list-style-type: none"> Can we add some context to the reason why some institutions should bear a greater % of the cuts? “Some institutions have access to large amounts of other resources that can be a buffer in time of decreased state appropriations” (Or something like that). Might want to flag that those institutions closer to funding also have access to other resources that some institutions don’t have – not sure all readers will understand that.
Page 37 Paragraph 3 Paragraph 5 Paragraph 5	Formula Upkeep	<ul style="list-style-type: none"> (para 3) This new responsibility will require additional capacity for the agency, as well as administrative authority to make technical corrections. (BOLD this sentence OR, perhaps restructure so that there is a sentence stating that this new responsibility will require additional capacity, including: - then have first bullet be the need for additional capacity, etc., for IBHE, and next bullet (bigger) be about need for new oversight body, etc.) As discussed in 2/15 Commission meeting, make clear that the Funding Formula Review Committee should be a standing committee similar to the PRP. (should not sound like it only convenes every 5 years to issue a report) e.g., A Funding Formula Review Committee should be created and charged with recommending updates to the formula every five years.

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		<ul style="list-style-type: none"> Also make clear that while the Review Committee is a standing committee that does annual technical updates (as specified), will produce a report on the functioning and impact of the new formula every five years. e.g., - Convene regularly once the formula is adopted. Can we include references to other student groups that were discussed in public comment but not addressed explicitly? English language learners, students that are unhoused, and undocumented students.
Page 38 Paragraph 2	Formula Upkeep	<ul style="list-style-type: none"> (2) – What would be considered a technical change? If you add a significant weight for graduate students that significantly changes the distribution, same with how headcount is used. . . as discussed at 2/15 Commission meeting, not sure it is appropriate for IBHE to have sole ability to make changes without a thorough review/legislative input/approval. [Is there language from PRP that might help here?]
Page 38 Paragraph 4 Page 39 Line 1	Accountability and Transparency	<ul style="list-style-type: none"> “However, data transparency is critically important and greatly lacking at this point. For this reason, data will be gathered and reported throughout.” The accountability and transparency system should include: 1. A Performance Review body of no more than 15 individuals with relevant expertise to oversee and implement the accountability and transparency system. This body should be comprised of IBHE and other policymakers as well as external stakeholders Spending: Given the substantial new investments institutions should expand spending transparency and, if necessary,

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		<p>accountability for how additional funds are being directed, including filing annual spending plans.</p> <ul style="list-style-type: none"> • “A body of no more than 15 individuals with relevant technical expertise. . . “ • An additional sentence stating clearly that the body of no more than 15 individuals is a group that is separate and apart from IBHE.
Page 40 Paragraph 1	Transparency and Oversight	<ul style="list-style-type: none"> • “IBHE should examine ways to consolidate existing reporting requirements, both for institutions and the reports it produces. Necessary reports and considerations for this process include:”
Paragraph 3	Holistic Review	<ul style="list-style-type: none"> • Holistic Review – don’t think we agreed that the IBHE Accountability Committee should be the one fulfilling this duty so whenever it says “expecting the IBHE Accountability Committee should. . .” Indeed, we meant to propose the new Performance Review body do these functions. So, it should probably be something along the lines of the “newly created Funding Formula Accountability and Transparency Committee” (or Performance Review body).
Page 41 Bulleted List	Accountability and Transparency	<ul style="list-style-type: none"> • In the bulleted points it states that “IBHE Accountability Committee could. . . “ but the goal is that this oversight body will be separate and apart from the IBHE Accountability Committee – “Funding Formula Accountability and Transparency Committee/Performance Review body could. . .”
Paragraph 5		

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Page 41 Paragraph 5	Other Resources	<ul style="list-style-type: none"> • Might make sense to mention that the Other Resources group considered whether to include grant awards, but determined that for various reasons – including restrictions, “lumpiness”, and not wanting to negatively impact giving, decided to omit them from the formula. (Might be helpful for readers to know that while we didn’t all agree on endowments, we did omit regular grant awards.) • “some of the other restrictions may still overlap with costs considered in the adequacy framework (e.g., endowed chairs, financial supports for first-generation students).” • Might we add a note in this section that when these resources are excluded from the formula we are then putting more of a pressure on state appropriations to fill the adequacy gap?
Page 42 Paragraph 4	Medical Cost Factor and Schools of Medicine	<ul style="list-style-type: none"> • Can you include (as a citation or in the appendix) the data or research that SIU and UIC is indicating?
Page 44 Last Paragraph	Deferred Maintenance	<ul style="list-style-type: none"> • In an appendix - can we have the breakdown of the deferred maintenance at each institution included? • We also might want to acknowledge that although deferred maintenance impacts all schools it is rooted in historical inequities and inequitable distribution so under resourced universities have an even greater time addressing deferred maintenance. And please reference the appendix where possible

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Page 45 Paragraph 1	Additional Student Populations	<ul style="list-style-type: none"> Can we include references to other student groups that were discussed in public comment but not addressed explicitly? English language learners, students that are unhoused, and undocumented students.
Appendix	Equity Gaps	<ul style="list-style-type: none"> Can we include an additional appendix solely showing graphics of equity gaps, showing the gaps for each of the priority populations along the educational continuum (enrollment, retention, graduation)? We realize it is included throughout the report but it would be helpful to have it summarized in one appendix the reader can go to.
Appendix E Page 69	Adequacy Base Costs	<ul style="list-style-type: none"> Each of the bulleted changes may warrant further explanation as to why change or exclusion was made.
Appendix E Page 70 Paragraph 2	Adequacy Base Costs	<ul style="list-style-type: none"> Why was SIU – SOM expenditures allocated to SIUC? Was there a specific reason for this? If so, it would be helpful to include that. Will the file that was used to calculate the statewide average expenditures be included on the Commission website? These numbers have seemed to shift by a few dollars over the course of time and it would be helpful to have a final base file for reference.

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Appendix E Page 72 Paragraph 1	Mission	<ul style="list-style-type: none"> The \$600 per student is then used. . . as described below above. <ul style="list-style-type: none"> Was this referring to the explanation of the calculation – if so it should be above. It may be helpful to just include a brief table of the final adjustments for R1, R2, R3, and Masters to make it more clear
Appendix E Page 72 Paragraph 2-4	O&M	<ul style="list-style-type: none"> For ease of reading it may be helpful to bold the section headers and have a separate paragraph for O&M since they are all calculated differently (institutional support, physical plant, and minor remodeling). <ul style="list-style-type: none"> Institutional Support: The institutional support cost per. . Physical Plant: The physical plant cost. . . Minor Remodeling: The minor remodeling per square. . . In case someone is just reading this appendix and goes to this section learn about Deferred Maintenance it might be helpful to reference that section of the report to acknowledge that it is being addressed elsewhere. How was the 30% more on lab space premium determined? It would be helpful to include that as a footnote.
Appendix E Page 72 - 73	Data Definitions and Notes	<ul style="list-style-type: none"> Low-Income – is it possible to include a footnote that alludes to the discussion around whether the recommendations should include “Pell Recipients” or “Pell Eligible”? <ul style="list-style-type: none"> This was a loft conversation throughout the TWG and warrants an explanation

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		<ul style="list-style-type: none"> EBF Tier – EBF Tier identified for each student based on the most recent high school code that a student attended (only. . . “ <ul style="list-style-type: none"> Not sure where the explanation for EBF is in the report but it should probably be included as a footnote in this section as well. “EBF Tier 1 and Tier 2 school districts are historically and currently the least well-resourced in the state resulting in students attending underfunded schools with inequitable access to resources to support learning.” After the two notes on EBF and “race not reported” we may want to allude to the need for IBHE to support and ensure accurate reporting for the purposes of this formula.
Appendix E Page 73	Adjustments	<ul style="list-style-type: none"> Can you include a clear definition of how “4yr college enrollment rate” or the fact that it is Illinois HS students who enroll within 6 months? If that is the case.
Appendix E Page 74	Amounts	<ul style="list-style-type: none"> Can we make a note that this is not an exhaustive list? <ul style="list-style-type: none"> “as illustrated in the following table – which is not meant to be an exhaustive list of evidence-based programs”

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Appendix E Page 75	Amounts	<ul style="list-style-type: none"> • Same not above – can we just ensure the reader knows this is in no way an exhaustive list of evidence-based holistic support programs?
Appendix E Page 76	Equity Adjustment #2	<ul style="list-style-type: none"> • Is it possible to cite some of the K-12 research on this topic? See Link • It seems intuitive but a more clear business rule would be helpful here “The number of students from intensive and high tiers divided by. . .”
Appendix E Page 78	Core Instructional Program Costs	<ul style="list-style-type: none"> • Can we add a note that the calculation for high-cost programs will likely need to be reevaluated regularly to ensure the appropriate programs are included and this should go to the Formula Upkeep Committee?
Appendix E Page 78	Diversity in High-Cost Programs	<ul style="list-style-type: none"> • Can we include a rationale for this section as well as with the other sections?
Appendix E Page 79	Mission	<ul style="list-style-type: none"> • It may be helpful to include here – as a reminder – that the \$600 is the base amount and the amounts discussed are additive – or reference the section that discusses that.

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Appendix E Page 80	O&M Institutional Support And Laboratory Space Factor	<ul style="list-style-type: none"> Again – can a 1-2 sentence rationale be added for these additional weights?
Appendix E Page 80	ESS	<ul style="list-style-type: none"> The examples are helpful but the example used for Tier 2 students doesn't quite make sense "Students who attended an EBF Tier 2 high school but are not low-income receive the 50% low-income subsidy, but not the 10% EBF Tier 2 subsidy." That student would not qualify for the low-income subsidy or the Tier 2 subsidy. They would qualify for the in-state undergraduate base of 30% though.
Appendix E Page 81	Other Resources	<ul style="list-style-type: none"> Option 1 – I believe this section is missing some language. Option 1 was the original recommendation of including 4.2% of the endowment value from IPEDS. This reads as if it is taking the full endowment value. Option 2 – It might be helpful to include a table that has the outputs for this recommendation with the data for each university. Is it possible to include a table that displays what is the \$ amount that would be included in the model for each university and each recommendation?
Appendix E Page 83	State Appropriations	<ul style="list-style-type: none"> "Note that this process will have to be repeated each year by the Formula Upkeep Committee in calculating the Resource Profiles."

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Appendix E Page 84	Allocation Formula	<ul style="list-style-type: none"> It was helpful for other calculations to include a visual representation of the calculation. Might that be included in this appendix for how the allocation formula is completed? "The proposed formula for cuts uses the same. . ."
Appendix F Page 85	Accountability and Transparency	<ul style="list-style-type: none"> Can we add some language before the list of metrics? Something along the lines of "The following metrics were discussed with the Accountability and Transparency subgroup as a potential starting point for the IBHE Accountability and Transparency body. These metrics are intended to be used to discuss and use in the operationalizing of the framework. In no way is this an exhaustive list but a way to begin the discussion . . ."

