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# ILLINOIS COMMISSION ON EQUITABLE PUBLIC UNIVERSITY FUNDING

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## 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](mailto: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	Subsidy categories and rates (weights) need to be reviewed and based on concrete data.
Equitable Student Share	Because subsidies are built on percent of students in a given category rather than counts, the incentive to enroll students of a given category loses its strength. Schools that don't have an incentive to increase a percentage, because it will never reach the percentage of schools in a different locale, will be forced to raise tuition. This will further block some students from attending. This will create a further divide between those who can afford their school of choice and those who cannot.

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Guardrail	For stability of funding for all institutions, a guardrail to prevent gross disparity of funding in a given year, that allows all universities to in part keep up with inflation, is necessary.
Reasonableness	As the formula currently plays out, in fifteen years the range of appropriation per FTE will range from approximately \$7,500 per student to \$27,000 per student, a 360 percent difference. It is not reasonable that it would cost the state almost four times as much to educate a student at one university rather than another.
Headcount versus FTE	Adequacy is based on student headcounts and would be more accurate if based on student FTE.
Inflation	Although partially addressed through a guardrail, it is still an unaddressed concern.

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### Specific Comments

Page Number, Paragraph, Section, etc.	Topic of Comment	Comment
Page 26, Table 4	ESS Subsidy Rates	Categories should be income based. Subsidy categories and rates (weights) need to be reviewed and based on concrete data.
Page 28, paragraph 3, third sentence	MAP/PELL clarification	Whether a student brings MAP or PELL with them does not incentive institutions to enroll them. In actuality, since MAP is not fully funded, bringing MAP and PELL students on board means universities supplement with internal need-based aid.

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Page 28, paragraph 3, last sentence	MAP/PELL clarification	By federal law, MAP and PELL can only be applied to the student awarded the funds. MAP can only be used for tuition and fees. If tuition and fees are less than the MAP award, the funds are not retained the university or the students. MAP is simply a flow-through the universities administer on behalf of the state. PELL can be used for any item billed, such as tuition, fees, room and board. If a student's PELL award (often with other aid) exceeds the billed costs, the overage is refunded to the student to be used for cost of attendance, not retained by the university. Thus, MAP and PELL cannot be used to increase university services or reduce another student's tuition.
Page 29, paragraph 2, last sentence	Tuition price setting	Tuition pricing is complex. To use ESS, based on non-scientific subsidies, as a means to control tuition rates is not advisable.
Page 29, paragraph 3	Mandatory Waivers	Last model had these included. It is important they are in the model as a means to partially compensate for this unfunded mandate. As an alternative, direct funding could be provided for this lost tuition and fee revenue.
Page 29, last paragraph, sentence 3	Mandatory Waiver reporting	Universities do report mandatory waiver data to the IBHE annually. Both counts and total financial impact. Inclusion in ESS could begin immediately.

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