IL Funding Commission Technical Workgroup meeting 2/2/2022 Public Comment Jennifer A. Delaney

I am concerned about the idea that equity is "built in" to the adequacy program. I don't see this in the components that are being considered. It is a nice thought that equity is "built-in" but that does not appear to be true based on the work done so far.

Using admissions as an example, traditional admissions processes have been shown to be inequitable. This is an active line of research for me (Harvard Press book published in December), and there is clear evidence that the current way institutions approach admissions – having students individually search for institutions, using list purchases for targeted recruitment, having "feeder" high schools, not doing outreach in a way that reaches all students, etc. Funding "traditional" admissions will not lead to more equitable access. Equity is **not** baked into these measures.

Because of this, I want to strongly encourage this workgroup to make time and space to talk specifically about equity measures or weights. No place for this appears on the timeline and this is very important. It will take time to figure this out well and space should be created specifically for this discussion.

From the discussion today, there were multiple "equity" measures and weights offered:

- 1. Pell premiums (or K-12 funding tier data)
- 2. New student premiums
- 3. Development education students
- 4. First-time full-time students
- 5. Adult learners
- 6. I'm sure there were others and should be more.

While there is value in the teams identifying these possibilities, this hodgepodge approach falls short of having a focused discussion about which equity measures should be used.

These should be purposefully identified to define "equity" for the formula for IL and **consistently** applied across groups. Also, there needs to be a discussion about the relative weight of these different elements.

Related challenges that also reflect the lack of a coherent conversation about equity in the model include:

- 1. Using both headcount and FTE
- 2. Is benchmarking to national averages the right approach?
- 3. Is using average spending levels the right approach?
- 4. Should high water marks be used?

5. Should concentration of need be considered? Thinking should not always be linear.

There is also a large challenge with data collection since beyond required reporting to IPEDS and IBHE data is challenging to find and often inconsistent. Attention should also be paid to the burdens of data collection from alternative sources (not IPEDS and IBHE) should be carefully considered by campuses and IBHE.

The second team presentation talked about bundling with wrap around services. This is, in fact, where the literature is. Single interventions are not sufficient. Broad wrap around services are needed. It is not sufficient to try to price individually, since the bundle is important. Also bundles tend to be very expensive. I believe that the One Million Degrees (OMD) program spends 2-3 times total spending on instruction by student on the wrap around services alone. OMD and ASAP are very similar in their cost structures. Parts of this process are very likely walking down a very expensive path.