IL Funding Commission Technical Workgroup meeting 6/8/2023 Public Comment Jennifer A. Delaney

Thank you for the opportunity to offer public comment. Throughout the work of this commission, I have been speaking about an important conceptual problem with the model being proposed that has not yet been resolved by the group. These concerns remain. However, today, I want to focus on the mechanisms that will drive the formula and to encourage the group to do more work in these areas. I will start with basics, then address hold harmless, equity adjustments, affordability, accountability, and stability. I then end with some more minor thoughts on using average measures and the use of degree-seeking students.

What is the purpose of the formula?

There is a mix between thinking about the formula as serving institutions and serving students. This confounding the purpose and level of analysis is leading to muddy logic throughout. I encourage the group to resolve this issue and to develop more clarity about what the formula is trying to do. For instance, the conversation about affordability looks very different if the formula is institutionally focused than if the purpose of the formula is to provide postsecondary opportunities for students. If the formula is about institutions, then what is the state trying to achieve? How will the formula meet state goals? While there is a great deal of overlap, institutional goals are not the same as state goals. As such, how will there be an alignment between these different purposes? How will the formula not limit institutional innovation? How will the state think about not overstepping its role and limiting institutional autonomy? If the formula is focused on students, then cannot easily defined goals – like free college for low-income students – be used as a yardstick for understanding if the formula will produce the outcomes sought to address principles like college becoming more affordable in the state?

Hold Harmless

More detail is needed about where hold harmless would be applied and what year would be used as a base year. Selecting only the highwater mark of funding, last year, or the year when the funding formula is not a well-justified decision. Likewise, it is not yet clear if hold harmless will be applied uniformly across all areas or only applied in some areas and not others. If it will not be uniformly applied, then what is the rational for not doing so?

Equity Adjustments

Both the groups that will be used for equity measures and how these groups will enter into the model needs to be resolved.

In addition, I am concerned about using different weights for different groups. There was some progress made on this since the last meeting by grouping together different groups. However, this still leaves open the question of whether it is right, and what values are revealed, if there are different dollar values associated with different student groups.

In some state-level performance-based funding models, the same amount is offered as an incentive for members of each targeted group. These incentives can be added together if a person is a member of more than one group. Why would we not do this in IL? Why are different weights needed to be applied to different groups?

Affordability

It is good to see attention given to affordability from a student point of view, but the expected UIF approach will not, on its own, yield a more affordable system. This raises the question about what accountability measure will be used in the formula.

In addition, there is a need to resolve the issue about how student aid is counted in the formula – is it a student resource or an institutional one? How does this work for federal student aid like Pell, state aid through MAP, and institutional aid? Will all sources of student aid be treated the same? If not, why not?

Accountability

What types of accountability carrots and sticks will be used? For instance, is the commission recommending price controls? Is this justifiable?

Stability

I will note again that, so far, there is nothing in the model that addresses stability. This is one of the elements in the legislation and is very important to directly address.

Two other smaller notes...

Using Average Measures

This approach hides too much. Illinois does not have that many public four-year institutions, it does not seem necessary to use averages. Michael's concerns are exactly on-point and should be resolved.

Using Only Degree-Seeking Students

Using only degree-seeking students does not get at a full picture of institutional scope and could limit institutional innovation in growth areas like badges, diplomas, public service, community outreach, etc. The percent of students who are degree seeking students varies greatly by campus, so more information is needed to know if this measure will offer a full enough picture of each of the institutions' student bodies.