Public Comments March 19, 2021-March 26, 2021

1. Comment #1. (Comments, please): Received 3/22/21

From: Suzanne Morris
Sent: Monday, March 22, 2021 1:40 PM
To: Spies, Amy
Subject: [External] Re: comments, please

Thanks for all your work on this. Just one thought. Perhaps we should be asking for more funding directly to the public community college and university system - with a requirement for a comparable reduction in tuition for students. The more state money that goes into MAP means more money for private schools as well as public. Increased funding for public higher edcould eliminate much of the inequities of MAP suspensions, offer lower tuition to all students, and provide accessible education to the most diverse population.

There are limited resources for higher ed and every dollar that goes to MAP is a dollar that isn't available for general funding for public higher ed. Some community colleges only receive about 8% of their budgets from the state, down from the original idea of 1/3 from state, 1/3 from local property taxes, and 1/3 from tuition.

I understand that there are taboo topics (such as pensions and MAP funding of private and for-profit colleges). However, without addressing these basic issues the continuous loss of higher ed students to other states will probably continue.

Thanks for all your work on this.

Suzanne

2. Comment #2. (Additional Ideas and Thoughts From the Center Partnership Faculty)

From: Jan Fitzsimmons – North Central College

Additional Ideas and Thoughts From the Center Partnership Faculty:

(In no particular order)

- Many rural students do not see the need for a college degree, and of those who do decide to attend college, many feel out of place in the higher education setting. So, there needs to be a way to identify what the issues are in both situations and find ways to address them.

- Is there a way to support college readiness in rural areas that simultaneously serves as field experience for education candidates?

- Access to reliable internet connections is something that rural students need, both to prepare for college and to participate in college.

- The state needs to think about ways to provide additional financial support, whether that be scholarships, grants, payments, or something else, to help potential minority, first-generation, low-income, rural, etc., pre-service teachers to help pay for tuition, room and board, transportation, fees, and teaching resources. Also, a stipend for beginning teachers going into high-need schools to help pay for supplies and resources might be a good idea, so these beginning teachers are not having to pay for these items out of their own pockets when schools cannot afford to provide these items.

- For many top students education is not viewed as a profession in the same way that medicine, law, dentistry, and other such professions because of the expectations for becoming a professional in these other areas. They see education as a career for the "average student" and not something for high-achieving students. These top students are seeing how teachers are treated on the job and how the expectations for licensure are "being rolled back" compared to other professions and deem this career path is not for them. How can this view and perception be changed so that more top students decide to come into teaching? How can the differences in preparation of the professions be addressed to that these students see teaching as a profession for them?

- Paraphrasing Deborah Ball "Teachers are not born, they are made," and this making of a teacher takes time and effort to develop both the content knowledge needed to teach and the pedagogical knowledge to teach and meet the needs of all learners. Preparing teachers is a labour and time intensive process where skills, strategies, and methods need to be repeated several times before future teachers grasp their importance and the subtleness in the differences between know a subject and knowing it to teach. The current trend of short, immediate credentials and licensure does not provide for the opportunities "to make the teacher." [The teacher shortage issue as been in the background for a long time and events of the last couple of

years have exasperated it, so the fix is going to take time as well. Short-term thinking may work in the short-term but may not be what is needed for a long-term fix.]

- As part of balancing the above, elementary school teachers in China usually only complete two-years of normal school on their path to becoming a teacher. However, their content preparation actually begins when they are elementary students with the nature of the curriculum and expectations, and their preparation continues after completing normal school. [This is a real life-long learning model.] Normal school training focuses on developing content knowledge for teaching and addressing misconceptions in content understanding while learning pedagogy for teaching. However, here is where the big difference comes in, these teachers specialize in one content area as elementary teachers, they do not teach as many classes during the day so they can participate in lesson studies, curriculum development, lesson planning, and additional learning in their content. These teachers "are expected" to be continually learning and refining their content and pedagogical knowledge throughout their career. Could something like this be developed in the U.S.? Yes, but it would take a shift in the understanding of what happens in PreK-12 and what teachers actually do as professionals. Easy – no, but could be very powerful for the future of schools, teacher preparation, and other career paths. [See Knowing and Teaching Elementary Mathematics: Teachers' Understanding of Fundamental Mathematics in China and the United States by Liping Ma]

- As we think about partnerships among multiple entities in a 1+1+2 program, how can we incent partners to align their programs to strengthen preparation as well as address affordability and attainment rather than just focus on affordability or attainment? And one developed, how can we celebrate this work to truly walk the P-20 talk?

- In conversations about college completion, what supports do we know adult learners need to really make completion and rigorous preparation a reality? For example, how can programs provide child-care at no cost? How can districts offer opportunities for adults working as paraprofessionals to maintain their benefits and income while completing a degree and licensure? Could there be an option to provide income and benefits while completing work in the summer? Could there be tax waivers or housing incentives for adults to complete their education to teach in shortage or high-need communities in both rural and urban areas?

- Could the state fund induction and mentoring, as well as teacher leadership positions to support retention in hard to staff rural and urban communities?

- How could the state leverage grant opportunities for colleges and universities to develop and sustain innovative partnerships that include multiple institutions in a variety of regions across the state? There only seem to be state grant opportunities for PK-12 districts to lead this work.

- How can teacher and leader preparation programs be better informed about the multiple design conversations that are going on across the state? Could there be some kind of bi-monthly forum where updates are regularly provided with an opportunity to write in suggestions?

- What is the lever(s) that elevate the profession and the collective impact of educators?

- As we consider a medical model for teacher preparation, how do we make more visible the costs of a medical model and ramp up the funds for a robust clinical experience in teacher preparation like that in medicine that allows funding for the institutions and engaged professionals that currently in education assume those roles voluntarily and still address affordability and attainment.

3. Comment #3. (IBHE - DAC Strategic Plan Recommendations)

Disability Services Advisory Committee (DAC) Recommendations for Illinois Board of Higher Education (IBHE) Strategic Planning White Paper

Introduction

Pursuant to the IBHE Strategic Plan, and specifically the priority areas of Affordability, Accessibility, Equity and Attainment, the Disability Services Advisory Committee (DAC) of IBHE puts forth the following recommendations:

Key Recommendation #1:   Colleges can increase affordability, equity and attainment for students with chronic and episodic conditions by developing and implementing appropriate medical leave policies.

While class attendance is traditionally considered an essential element to education, IBHE DAC recognizes that the episodic nature of some disabilities may occasionally impede student class attendance or the ability to submit coursework by deadlines. In such cases, through an interactive process, the campus Disability Services office or Coordinator may determine that an accommodation related to class attendance and/or participation may be necessary. In response to increasing numbers of students requesting accommodations related to attendance due to chronic, episodic conditions, the Episodic Condition Sub-committee of the IBHE Disability Services Advisory Committee (DAC) has developed an internal guidance document about accommodating those students in post-secondary classes. Statewide, disability coordinators have an integral role in retaining the increasing numbers of students with episodic and chronic medical conditions, with institutional and state support. (Detailed recommendations are available in a separate document available upon request).

Affordability:

Students with disabilities, adult students, military students, pregnant and parenting students, as well as a number of other populations of students are often encouraged to withdraw from individual or a full term of courses when unexpected barriers arise to their education. This leads students with a large financial burden for various reasons. For example, they lose money and aid that they invested in that semester/course; they must invest in summer courses or continue to enroll for additional semesters beyond the time that they planned to attain their degree. Such accommodations and policies proposed by the IBHE DAC would alleviate situations in which students must leave school for disability related reasons and are unable to return because of outstanding debt to their college.

Accessibility and Equity:

Implementing policies and procedures with equity in mind will help colleges retain students with disabilities who have episodic flare ups of disability-related conditions. Implementing policies with

accessibility and equity in mind will provide equal access to students with disabilities to participate equally in meeting the learning outcomes of their educational program.

Attainment:

Colleges that implement equitable flexibility with assignment and attendance accommodation policies and appropriate leave policies can open the doors for students with episodic conditions to attain their degrees at the same rate as their peers.

Key Recommendation #2: Colleges can increase accessibility, equity and attainment by requiring a base number of staff to serve students with disabilities.

Over the last 70 years the population of students with disabilities receiving accommodations has steadily grown. According to the National Center for Education Statistics (NCES), the current population of undergraduate students with disabilities is 19.4% (this is an increase of 8.4% from 2011-2012), and graduate students with disabilities is 11.9%.

As the number of students receiving services has grown, unfortunately, the staffing in Disability Support Services offices (DSS) has not expanded to match the increase. According to the National Center for College Students with Disabilities (NCCSD), the ratios are significantly lopsided. In looking at the average number of full-time staff in DSS offices, average student-staff ratios range from 94:1 on small campuses of 1,500 students or less, to 159:1 on larger campuses with 30,000 students or more. Specifically addressing the issue of staffing, the average number of full-time DSS staff on campuses with less than 1,500 total enrollment is often one full-time professional; while campuses with a student enrollment of 30,000 or higher, the average is 13 full-time staff.

This research data was sought as a supplement to the anecdotal responses from Disability Service practitioners and directors who make up the Disability Access and services Committee (DAC). After administering the DAC Caseloads Survey, we quickly learned that the staffing issues among DSS offices at Illinois colleges and Universities mirror national statistics. Of all the respondents, the average number of full-time professional staff approving accommodations for students with disabilities was 3 with an average of 1205 students served by the disability services office. The following responses to specific survey prompts proved most illuminating:

● When asked, "Do you currently feel as though your office is overwhelmed in terms of caseload?" 59% of respondents indicated "Yes".

● When asked "…what solution do you feel would be best to address this?" 67% of respondents indicated that "Additional Staff" would be the right approach.

Recommendations:

Considering that each office is different with regards to reporting lines, and population size, we used the data collected through the DAC Caseloads Survey as well as the statistics from NCES and NCCSD to determine the following as the baseline staffing model to ensure students are provided with adequate support to help them learn most effectively:

● 1 Full time person to work on policies, procedures, faculty education and advocacy.

● 1 Full time person to meet with students through the intake process which includes deciphering documentation, determining, and facilitating accommodations and working with the faculty. This also includes accommodation renewal from term to term and would need to increase as the number of students with disabilities registering for services increased.

● 1 Full time person to run the Accommodated Testing Center and coordinate Auxiliary Services and Aids.

● 1 Full time person to work with digital accessibility and assistive technology software, Online Courses & Content Management.

● 1 Full time person to work with alternate format materials, captioning & interpreting services for deaf and hard of hearing students, and conversions.

Access & Equity

Appropriately qualified staff function as advocates to ensure disabled students have an equal opportunity to succeed at each institution.

Attainment

Sufficiently staffed Disability Services offices will ensure that students have the needed access and accommodations without delay, leading to successful degree attainment.

Key recommendation# 3: Colleges can increase accessibility, equity and attainment for all students by providing accessible online content

Illinois State law requires that State agencies and universities make every aspect of web sites, information systems, and information technologies accessible to people with disabilities. This is a requirement which impacts every facet of campus life--for students, staff, and the communities served by Illinois Higher Education institutions.

All aspects of the Illinois Higher Education institutions are accessed via websites and information systems technology. When websites and other content is not accessible, disabled students, employees and citizens are excluded from full participation in Illinois Higher Education institutions.

Illinois Higher Education institutions are struggling to implement website and information systems accessibility, also known as digital accessibility, in a consistent and reliable manner. Many of the Disability Advisory Committee member institutions do not have a policy, position, or identified department which assumes responsibility for compliance in this area. Disability offices cannot effectively monitor this work with existing staff while maintaining an appropriate level of responsiveness to student accommodations and services.

The DAC surveyed our member institutions to gauge whether most were struggling with this issue. Most members stated a need for policy, while others also needed staffing in this area. The results are summarized below.

Does your campus have a campus-wide digital accessibility policy in place?

● **74%** of members stated that they either do not have a policy, or were currently attempting to create one.

● **26%** of members stated that they have an existing policy.

Does your institution have a campus wide position or department that works with all campus departments to ensure digital accessibility?

● **44%** do not currently have a position, or have only recently requested one.

● **56%** have a dedicated position or department identified.

Affordability

When students find that a college cannot meet their accessibility and accommodation needs, they can experience a delay in degree progress and possibly increase costs. They may need to relocate, or to retake coursework, or attend an institution with higher tuition.

Creating natively accessible courses and online content reduces duplication of staff time and effort, which would reduce operating costs.

Accessible online content is high-quality content ready for all students to utilize, regardless of ability. Accessible online content has the potential to attract students to Illinois institutions who may be choosing other online institutions.

Access & Equity

Given that digital accessibility standards are State requirements, it creates a compliance issue as well as an equity issue for disabled students. Each campus should have mechanisms to address this critical area of compliance by developing digital accessibility positions, policies, and procedures.

Attainment

Compliance with these standards reduces barriers to degree attainment for students with disabilities.

Other issues to address:

In addition to the recommendations above, DAC emphasizes the importance of the following issues to address affordability and equity and attainment issues:

● Affordability and availability of diagnostic testing for learning, language, cognitive, and mental health conditions (including students over 18 years old).

● Deeper collaboration with Illinois Vocational Rehabilitation Services.

● Deeper collaboration with secondary schools to support transition of students with disabilities from high school to college.