

Public Comments March 26, 2021 – April 2, 2021

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1. Comment #1. (ICCDC Written Submission for the Strategic Plan): Received March 31, 2021

Bond, Terrance
To: Ginger Ostro
CC: Farmer, Erin; Laura Ortiz, Bond, Terrance

Dear IBHE Strategic Plan Advisory Committee Members:

On behalf of the Illinois Community College Diversity Commission (ICCDC) leadership team, I would like to submit our feedback on the IBHE Strategic Plan. Thank you for your time and we welcome opportunities to provide clarification or further support in your efforts.

Take care.
-Terrance

Terrance Bond
Heartland Community College
Assistant to the President
Equity, Diversity, & Inclusion


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www2.iccb.org/diversity

Dear IBHE Strategic Plan Advisory Committee Members:

On behalf of the Illinois Community College Diversity Commission (ICCDC) membership, we thank you for sharing your draft strategies, and for continuing to solicit input from the broader higher education community.

The ICCDC's mission is to advocate for Illinois community college diversity, equity, and inclusion (DEI) practitioners in their effort to create strategic objectives to advance their campus diversity effort and address issues that impact community college stakeholders from diverse populations. Our membership includes DEI practitioners from 23 of the state's community colleges. Our overarching goal is inclusive excellence, and we worked to examine this draft through this lens.

We would like to begin by sharing a global observation. Overall, we found IBHE's role in this plan to be unclear, and it is not evident that IBHE has established a framework to support institutions in pursuit of applying the expressed strategies to meet the desired outcomes. It would be helpful to Illinois' institutions of higher education for IBHE to provide comprehensive, centralized support to ensure equitable access to resources and to hold all institutions accountable for demonstrating their commitment to DEI.

Our comments below begin with an observation from a specific priority and subsection of the draft, followed by recommended additions or adjustments.

Priority Area 1: Increase Postsecondary Credential/Degree Attainment to Develop the Talent that Drives Illinois' Economy

Future of Work and the Future of Learning.

- Aligning educational offerings to future, dynamic workforce needs should also address the systemic barriers that have prevented access and success in higher education for certain communities. If IBHE wants all Illinoisans to have opportunities to fully engage in education and work, the design must begin with integrated pathways that support the state's economic development plans, institutions of higher education, and the workforce members in these economically disadvantaged communities.
 - We propose the following additions:
 - “Review, redesign, and establish new IBHE policies and procedures that facilitate more flexibility for institutions to deliver innovative educational models.”
 - “Prioritize supportive funding and technical assistance for efforts to align educational offerings and workforce needs when these efforts can positively impact underserved communities.”
 - “Promote the talent developed at Illinois colleges and universities to foster investment from existing and attraction of new industry in the state, especially in economically disadvantaged communities.”

State's Workforce.

- For low-income individuals and families, people of color, and those in rural communities, who are underserved by higher education in Illinois currently, providing educational opportunities *within their own local setting* is one important step. Integrating strategies around delivery of programming at the local level (e.g. community college offerings in high schools, university centers, baccalaureate degree programming offered at community college sites) is an important step IBHE could play given its relationship with ISBE and ICCB.
 - We propose adding, “In partnership with ISBE and ICCB, support the development of educational models and institutional partnerships that address supply/demand gaps.

State's Educator Workforce.

- Diverse cultural representation in the curriculum enriches the student experience. We recognize the intersection between our Westernized curriculum and its contribution to systemic racism. When all students are presented with a culturally diverse curricular experience, it serves a dual purpose of dismantling stereotypes for all and offering inspiration to learners previously marginalized or excluded from the curriculum. It is crucial to provide Illinois' future educators with the opportunities in their training to develop culturally responsive curriculum as well as inclusive pedagogy.
 - We propose adding:
 - “Model inclusive teaching and learning excellence by integrating diversity, equity and inclusion throughout educator preparation programs to ensure that future educators

have expertise and experience developing culturally responsive curricula and practicing inclusive pedagogies.”

Adults with Some College and No Degree (or less education).

- Developing clearer and more seamless pathways for students between adult basic education, high school equivalency, community colleges, baccalaureate-granting institutions, and employers is one important step to better serving this population. A better understanding of why some students begin and do not complete college, however, is critical to adequately address barriers adult learners face and improve educational attainment rates. In addition to student supports, culturally responsive curriculum and inclusive pedagogy are important to addressing the current equity gaps in educational attainment.
 - We propose the following:
 - Change “Adopt teaching and learning methodologies and practices most appropriate for adult students.” to “Adopt inclusive andragogy to ensure that students experience culturally diverse curricula and inclusive classroom communities, regardless of program or delivery mode.”
 - Change, “Develop advising, outreach, and counseling specifically for adults.” to “Design and redesign student support services including advising, outreach, and counseling so that adult learners are equitably served at full scale in higher education institutions in Illinois.”

High School, College, and Career Connection.

- Improving pathways between educational institutions from K-12 to community colleges and baccalaureate-granting institutions is important as is connecting students early to career opportunities and exploration. IBHE could support this work with clear policies and procedures that improve transitions between institutions and hold institutions accountable to the practices that facilitate effective transitions.
 - We propose the following:
 - Add “Create flexible curriculum approval policies and procedures that allow for dynamic experiential learning”
 - Add “Partner with state agencies to incent employers to participate with higher education institutions on experiential learning opportunities”
 - Add “Partner with ISBE and ICCB to provide state-funded tools and resources for students to explore careers options”
 - Change “Create options for applied associate degree holders to pursue baccalaureate degrees” to “Establish transfer policy and procedure for credits earned in applied associate degrees for seamless transfer toward completion of a baccalaureate degree”
 - Add “Hold institutions accountable to following existing, new, or enhanced transfer policies and procedures between community colleges and baccalaureate-granting institutions.”

Priority Area 2: Close Equity Gaps

Design System to Meet Student Needs.

- The preliminary strategies around designing a system to meet student needs is lacking the tangible actions to close equity gaps. Too often we hear about the areas to improve, such as increasing faculty, staff and leadership of color; however, there needs to be additional details outlining the strategic approach for achieving this.
 - What are the metrics for this area? Do we have a target?
 - We propose the following:
 - Change “Increase faculty, staff, and leadership of color” to “Increase faculty, staff, and leadership of color by (outline specific strategies and metrics)”
- There must be a commitment to accommodate the differences of our students to meet them where they are. This goes beyond the common student support practices mentioned, to be inclusive of students’ diverse backgrounds, life circumstances, aspirations, mental health, basic needs, etc.
 - We propose the following:
 - Add “Inclusive teaching excellence to intentionally create an equitable classroom environment for all students in meaningful and relevant learning. Practitioners must acknowledge systemic and institutional inequities that directly impact students’ educational experiences.”
 - Add “Trauma informed pedagogy will be used to enable instructors to recognize student’s past and present experiences and the effects of those experiences on students’ well-being.”
- We recommend including language about the Open Education Resources (OER) that are available and can be used to reduce student expenses. There is an extensive list of resources available and utilizing OER will “offer an opportunity for systemic change in teaching and learning content through engaging educators in new participatory processes and effective technologies for engaging with learning,” (oercommons.org).
 - We propose the following:
 - Add “Utilize Open Education Resources to provide access to course materials for all students to ensure the affordability of textbooks does not hinder student success.”
- Campus climate surveys are beneficial indicators for areas of growth and opportunity. Oftentimes, it can be difficult to obtain enough participation for data to be statistically significant. It is important that other metrics are also used to obtain feedback in driving the action plan.
 - We propose the following:
 - Change “Implement campus climate surveys and take action based on the results,” to “Implement campus climate surveys and focus groups annually/bi-annually to develop an action plan based on identified areas for growth.”

Priority Area 3: Improve Affordability, Increase Access and Manage Costs

- Affordability is too often seen as the biggest barrier to access and attainment. Student debt has increased and has led to inequitable outcomes. To increase attainment and close equity gaps we must ensure access, address the underlying affordability issues, and consider the cost structure of higher education. This includes opportunities to improve efficiency and equitable and adequate ways to fund the system.
- As a commission we agree that affordability is a significant barrier to access and attainment and believe that true affordability requires focus on strategies to lower college costs. Unfortunately, the draft plan does not clearly identify initiatives to lower college cost or close the equity gaps.
- As such we request you continue to consider improving access to financial aid and reducing student debt by drafting legislative policies and financial support that provides students the opportunity to complete programs and degrees in Illinois. Student debt relief and wrap-around services will be key to success in this initiative. In the end there's a widely held belief that high cost means high quality and that we can't reduce the cost of college without sacrificing quality. There is no evidence that this is true.

Working Higher Education Core Principles

Equity drives our system.

- The strategic direction context calls out systemic racism in higher education, specifically for its contributions to racial inequality as well as it's potential to be a powerful actor against systemic racism. The strategy draft, however, fails to speak to this understanding. One small area where this can be restated is in the context of our Core Principles.
 - We propose the final sentence be adjusted to read: "Access, affordability, **and anti-racism** are embedded in our definition of equity."

We reinforce the P-20 education continuum.

- One measure that remains pervasive across the P-20 education continuum is demographic bias. As a system, our data shows that students from differing demographic backgrounds receive drastic variations of this "seamless educational experience. Rather than infer this difference, it should be embedded in our Principles.
 - We propose the following adjustment to the initial sentence to read, in part: "...reinforcing relationships so that students **across all demographic representations** have a seamless educational experience..."
- The second sentence also misses an opportunity to reinforce the value of having a workforce representative of our student population, dedicated to creating inclusive environments

across the continuum.

- We propose the following adjustment to the second sentence to read: “We embrace our role in developing **a representative** educator workforce **dedicated to creating culturally reflective spaces.**”

Higher education is a public good that enriches life.

- We affirm the value of higher education as a public good, but also recognize the impact a lack of culturally relevant curriculum can have on minoritized and international student populations. When the curriculum presents ideas from non-dominant cultures, all students benefit and are given an opportunity to challenge biases and prejudices. Only then do we believe all lives are being enriched.
 - We propose the final sentence be adjusted to read in part: “**Culturally relevant** liberal arts and humanities ensure we support the whole student...”

The ICCDC requests your consideration in reexamining our 10-year Strategic Vision through an inclusive lens, and we strongly advocate for the modifications provided herein. These actions would undeniably center equity in the Illinois Higher Education System and prioritize innovations that remove barriers and support positive outcomes for every learner.

Sincerely,
The ICCDC Executive Board

Isaac Zuniga, Ed.D.
ICCDC President

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Terrance Bond
ICCDC Vice President

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2. Comment #2. (Written Submission for the Strategic Plan): Received April 2, 2021

From: John Corrigan [REDACTED]
Sent: Friday, April 2, 2021 7:13 AM
To: Ginger Ostro [REDACTED]
Cc: Spies, Amy [REDACTED] Ray, Jaimee [REDACTED] Kelly Denson [REDACTED] >
Subject: [External] Written Submission for the Strategic Plan

Please find attached the Association of American Publishers' (AAP) written submission for the IBHE's Strategic Plan. Of course, please let us know if you have any questions or if you need any additional information.

AAP: <https://publishers.org/>

April 1, 2021

Ginger Ostro Executive Director
Illinois Board of Higher Education 1 N. Old State Capitol Plaza Suite 333
Springfield, IL 62701-1377

RE: Illinois Board of Higher Education 2021 Strategic Plan – Student Cost Savings on Course Materials

Dear Director Ostro:

I write to thank you for discussing the Illinois Board of Higher Education's (IBHE) 2021 Strategic Plan with us on February 16th and to provide further information about the dynamic and affordable course materials that are the focus of the American publishing industry. As detailed below, we—like you— are committed to closing the equity gap on college campuses.

About the Association of American Publishers

The AAP represents the leading book, journal and education publishers in the United States on matters of law and policy, advocating for outcomes that incentivize the publication of creative expression, professional content, and learning solutions. Publishers have played a vital role in fostering the education ecosystem and public interest in the United States for more than two centuries.

Indeed, the American publishing industry is known and respected throughout the world for its high- quality books and course materials across a vast number of subject areas, many of them essential for students preparing to solve increasingly complex challenges involving math, science, medicine, law and so much more.

Course Materials are Dynamic and Affordable

AAP and its education member companies have long understood that students often struggle to pay for college. The issue of college affordability is of the utmost importance to AAP's member companies, who are working hard to do their part in lowering college costs, specifically the cost of course materials.

In recent years, publishers have developed a new generation of digital learning course materials and innovative delivery models that make learning more efficient, significantly reduce costs, and meet the needs of ever-evolving students and faculty. These dynamic, customizable course materials are not only interactive, reflecting student progress and ultimately improving course success, but also typically cost significantly less than color, hardbound textbooks. Publishers are dedicated to developing materials that not only allow students to achieve their academic goals but are also cost-effective.

455 Massachusetts Ave. NW • Suite 700 • Washington, DC 20001 • 202-347-3375 • www.publishers.org

As a result of this commitment from publishers, student spending on course materials has dropped significantly over the last few years, as shown in two recent surveys and the College Board's recent report:

- Student Watch: a recent survey found a drop of 35% in student spending on course materials over the past six years. The Student Watch findings are the result of a survey involving more than 14,000 students across 35 institutions.
- Student Monitor: another recent report indicates a 39% decline in student spending on course materials over the past six years. The Student Monitor findings are the result of comprehensive, one-on-one, on campus interviews conducted among four-year, full time undergraduates attending 93 colleges and universities.
- Trends in College Pricing Student Aid 2020 Report: college board's report found that the average student spends \$410 annually on course materials, and average student spending on college textbooks and digital course materials has steadily declined in recent years.

Affordability, Quality, and Equity

This multi-year decline in student spending stems in part from the wide variety of options that are now available, in no small part due to significant investments made by education publishers in formats ranging from traditional textbooks to e-books, rentals, subscription services, innovative models such as Inclusive Access programs which provide students with discounted materials on the first day of class, and subscription models that give students unlimited access to a range of textbooks, online homework and study guides all for one price, as well as Open Educational Resources (OER).

In 2015, the Obama Administration through U.S. Department of Education issued regulations (34 CFR 668.164(c)(2)(i)) allowing institutions of higher learning to charge students for books and supplies as part of tuition and fees. In this section of the regulation, the institution has an arrangement with "a book publisher or other entity" that makes books or supplies available "below competitive market rates," provides a way for students to obtain books and supplies by the seventh-class day, and provides students the ability to opt out of the program.

Programs developed in accordance with the federal regulation are commonly called "Inclusive Access." These programs are critical in that they provide both access and affordability to course materials by helping students obtain them by the first day of class at a discounted price.

Through these programs, publishers can provide access to digital materials, on or before the first day of class to all students enrolled in a course, and students can pay for course materials at the same time they pay tuition and fees. By delivering course materials digitally, education publishing companies can substantially lower the cost of materials as compared to the price of traditional print-based textbooks. Inclusive Access programs often provide students with course materials that are up to 70% lower than the price of a traditional new color hardcopy textbook. Students can also use loans, grants and scholarships to pay for their course materials. In accordance with the federal regulation, if a student does not want to participate in the program, he or she can opt out.

Correcting Misinformation

American publishers- including, especially, those focused on education-have worked diligently to reduce the cost of textbooks. We are, however, aware that there is considerable misinformation circulating that undermines these private sector contributions. A recent PIRG report inaccurately cited the average cost of textbooks to be \$1240 when in fact, The College Board report - Trends in College Pricing, reported a disaggregated figure with the average spend on textbooks to be \$410.

Disaggregating the books and supplies figure reveals a more accurate datapoint for the average costs of college textbooks and is more reflective of the purposeful work that publishers of all sizes and specialty areas have done to ensure affordability in recent years.

SB 101 and HB 332 One-Time Course Materials Equity and Affordability Study

- Identifying Cost Savings Best Practices: the study requires public universities and community colleges to identify cost savings best practices and examine how increased access to course materials improved equity outcomes for higher education students.
- Improving Learning Outcomes: the study will examine how digital course materials improve learning outcomes for minority, low-income, and first-generation students.
- Exploring Low-Cost Digital Programs: several Illinois universities and colleges have yet to explore the benefits of implementing a low-cost digital program.

Education publishers have been a critical partner in the American education system for two centuries. As always, but especially now during such challenging times, they are focused on providing course materials and learning solutions that put teachers and students first.

Thank you for considering our approach to textbook affordability for the IBHE 2021 Strategic Plan. We look forward to working with you on equity and student affordability issues in the future. Please feel free to contact me if you have any questions or comments.

Respectfully Submitted,

Kelly L. Denson
Vice President, Education Policy & Programs Association of American Publishers

Cc: Deputy Governor Jesse Ruiz
Amy Spies
Jamie Ray

3. Comment #3. (Strategic Plan Feedback): Received April 2, 2021

Joianne Smith

To: Ginger Ostro

Dear IBHE strategic Planning Committee,

I would like to thank the members of the committee and the staff of the Illinois Board of Higher Education, Illinois Community College Board, and Illinois Student Assistance Commission, for your ongoing work to think strategically about the role of Higher Education in Illinois.

I know that you have already received feedback from the Illinois Council of Presidents regarding our encouragement for the advisory committee to explicitly elevate one of the equity strategies in the plan -- namely elevating a strategy for early childhood educators by authorizing community colleges to offer bachelor's of applied science degrees as well as educator licensure, in early childhood education in order to advance racial and gender equity in access and degree completion and to stem the teacher shortage crisis.

Given that one of Oakton's Board of Trustees members, Ms. Martha Burns, represents the ICCTA on the Strategic Planning Committee, we wanted to make sure that you had feedback directly from Oakton Community College supporting this strategy.

I sincerely hope that the strategic planning committee will include an explicit strategy for pathways for education, including authorizing community colleges to offer the bachelor's of applied science degrees.

Thank you for your consideration,

Joianne Smith