SPARC✱

April 30, 2020

Stacey Slijepcevic
U.S. Department of Education
400 Maryland Avenue SW
Room 268-34
Washington, DC 20202

Re: Docket ID ED-2020-OPE-0031-0001

Dear Ms. Slijepcevic:

On behalf of SPARC, the Scholarly Publishing and Academic Resources Coalition, I write to comment on the Proposed Priorities, Requirement, and Definitions: Fund for the Improvement of Postsecondary Education-Open Textbooks Pilot Program (Docket ID: ED-2020-OPE-0031-0001). SPARC is a global coalition working to make open the default in research and education. Our membership includes more than 200 academic and research libraries across the U.S., many of which have extensive experience running projects to create new open textbooks and expand their use.

SPARC has been a staunch advocate for the Open Textbook Pilot program, advocating for appropriations by Congress over the last three fiscal years. We strongly support the purpose of the Open Textbook Pilot as directed by Congress, and we appreciate this opportunity to comment on the Department's proposed priorities, requirement and definitions.

Topic 1: Award Size

SPARC strongly supports setting a maximum award size in order to ensure that a significant number of projects receive funding. We recommend a maximum award size of $1 million and a target number of awards in the 15-20 range in order to ensure adequate funding for a variety of projects.

We also recommend shortening the proposed 48-month grant period to 24 months. There are urgent issues facing higher education that the expanded creation and use of open

textbooks can address, and shortening the grant period will push applicants to think creatively about how to achieve results on a shorter timeline.

We urge the Department not to preclude smaller projects through its award and requirement structure. There is strong evidence for open textbook projects that leverage relatively small amounts of funding into significant student savings. For example, a report by the North Dakota State Auditor found that the North Dakota University System achieved $1.2-2.4 million in student savings through a project funded with a $110,000 state appropriation, which represents a tenfold return on investment.[1] In SPARC's Connect OER platform, where institutions share data on their open education programs, the average campus open education program budget was around $41,000, and the cumulative savings for students was more than elevenfold.[2] While this represents just a snapshot of programs, it illustrates both the power and importance of small grants.

Topic 2: Matching Contributions

SPARC recommends against a matching funds requirement for this competition. While we generally acknowledge that under ordinary circumstances, requiring institutions to match government contributions can incentivize greater investment. However, the COVID-19 crisis has upended higher education operations and budgets, making the idea of matching funds both logistically and fiscally unfeasible for many—if not most—potential applicants. A matching funds approach also tends to favor those institutions with greater access to resources, potentially leaving behind those with underserved student populations who may benefit from open textbook programs the most.

Topic 3: High-enrollment

SPARC strongly supports the overall strategy of focusing investment in open textbooks on high-enrollment courses and programs, since it is important for the funded projects to focus on courses and programs that serve the greatest number of students.

While we are supportive of most of the technical changes to these definitions, we are concerned that the threshold for "high-enrollment" is still far too low. We recommend raising that threshold to at least the top one tenth of courses and programs respectively, especially given that the proposed changes expand the scope to include more types of postsecondary credentials and contexts in which to qualify as "high-enrollment."

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[1] Brianna Ludwig, *Audit Report Finds North Dakota University System Open Educational Resources Initiative Has Saved Students Over $1.1 million,* North Dakota Office of the State Auditor (Nov. 20, 2018), https://www.nd.gov/auditor/news/audit-report-finds-north-dakota-university-system-open-educational-resources-initiative-has

[2] SPARC, 2018-2019 Connect OER Report, https://osf.io/preprints/lissa/dvmfn/download (last visited April 30, 2020).

Topic 4: Open Textbook Definition

SPARC appreciates the Department's efforts to refine and clarify the definition of "open textbook." We strongly support the definition's use of the strong open licensing terms specified by Congress, which will ensure that open textbooks created through the program are available to higher education institutions, educators, and students everywhere to freely and openly use.

We are generally supportive of the overall approach of expanding the definition to include materials and resources required for the effective use of a textbook, save for one requested clarification. As written, the definition could be interpreted as ambiguous about whether the additional resources, materials, and tools would need to be available under the same licensing terms as an open textbook itself. We request that the final definition and documentation clearly specify that any item included in the definition of an open textbook must also be licensed under identical terms.

We would also like to respond to the suggestion that assessments or other supplemental technology be excluded from the open textbook definition in order to avoid the open licensing requirement. SPARC strongly opposes any exclusions or exemptions from this definition. Congress was clear in their intent for the materials funded by these taxpayer dollars to be made freely and openly available to achieve student savings, and any exemptions would be counter to that goal. This is an opportunity to encourage potential applicants to innovate new assessment models that can be openly shared without limitations.

Proposed Priorities 1, 2 and 3

Given how COVID-19 has fundamentally changed the dynamics of how institutions operate, we strongly recommend adding more flexibility into these priorities. While we would agree that all of the components listed under each priority are important considerations for open textbook projects, together the priorities require applicants to develop plans for twelve distinct requirements, which could be particularly burdensome for applicants from smaller institutions. Possible ways to increase flexibility would be to set these as competitive preference priorities or making some of the requirements optional for grants below a certain size.

Proposed Priority 4

SPARC strongly recommends eliminating this priority, as it is not clearly aligned with the purpose of the Open Textbook Pilot. As stated in the notice, the purpose of the program is to "create new open textbooks or expand the use of open textbooks in order to achieve savings for students while maintaining or improving instruction and student learning outcomes." This proposed priority would direct grantees to develop costly advanced

technology, which is neither essential to the use of open textbooks nor guaranteed to prove effective at improving student learning outcomes. Critical analysis of adaptive learning technologies has been increasing, as questions have been raised over the equity implications of algorithms and concerns over exploitation of student data. Furthermore, the COVID-19 crisis has exposed how many students lack adequate access to electronic devices or broadband access, so investing in this type of technology may ultimately exclude many learners it is intended to help.

There is an extensive body of research documenting effective open textbook programs that have saved students money while maintaining or improving student learning outcomes. A peer-reviewed analysis of 36 studies published between 2015 and 2018 concluded that "results across these studies suggest students achieve the same or better learning outcomes when using OER while saving significant amounts of money."[3] With many documented success stories of open textbook programs—many with outstanding returns on investment in terms of student savings—it would be more effective to prioritize strategies backed by a strong basis of evidence and proven track record.

Proposed Requirement

SPARC recommends eliminating paragraph (a) from the proposed requirement for eligible applicants. While we support the spirit of ensuring that applicants are seeking collaborations between multiple institutions and potential employers, these requirements are overly prescriptive and not necessarily the most effective partnerships needed in order to craft a successful project. Moreover, given the dire effects that COVID-19 has had not only on institutions of higher education but also employers, the burden of constructing a consortium could deter qualified applicants or detract resources away from other forms of collaboration. In these unprecedented times, it would be better to offer more flexibility for institutions to design consortia that work for their needs and justify their efficacy under Proposed Priority 1, rather than construct additional barriers to eligibility.

Additional Comment

One additional issue that SPARC would like to address is how the Department will structure its selection criteria for proposals. Given the clear directive from Congress that the purpose of the program is to achieve savings for students, we recommend prioritizing those proposals with the highest estimate of projected student savings by setting this metric as the first tiebreaker.

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[3]John Hilton III, *Open educational resources, student efficacy, and user perceptions: a synthesis of research published between 2015 and 2018* (August 6, 2019), https://link.springer.com/article/10.1007/s11423-019-09700-4

In closing, thank you for the opportunity to submit our comments. The Open Textbook Pilot has generated a significant amount of interest and anticipation in our community, and we are hopeful that this year's competition draws a robust and innovative set of proposals, yielding a significant number of new projects that benefit students.

We will be closely following the implementation of this program, as we continue our efforts to secure further appropriations in future fiscal years. Please do not hesitate to reach out if we can provide further information or technical assistance.

Sincerely,

Nicole Starr Allen
Director of Open Education