

Dear Task Force Members,

Congratulations on a detailed, thorough exploration of the practices and options for reducing the costs of learning materials in postsecondary education in Illinois. There is some amazingly valuable information contained in the report, including a careful treatment of MHEC's work to support the implementation of Open Educational Resources (OER) in Illinois. Regarding MHEC's work, our report, [Toward Convergence, Creating Clarity to Drive More Consistency in Understanding the Benefits and Costs of OER](#), was mentioned several times. Most of the references to that paper were positive, and we hope it brings value to the work of the Task Force and to the state as institutions and states continue to measure and calculate the ROI of investments made in the use of OER.

On pages 120, 123, and 160, however, the following footnote appears in reference to the report: *Five Task Force members indicated they believe there are inaccuracies in the matrix/table provided in slide six of the MHEC Task Force presentation. This same matrix is also included in MHEC's report - Toward Convergence, Creating Clarity to Drive More Consistency in Understanding the Benefits and Costs of OER. Both of those sources are referenced above. Several of those Task Force members indicated they have vocalized their concerns to MHEC.* MHEC would like to share with the Task Force the same responses offered to those who reached out to us with concerns about the veracity of the table on page 9 of our report, which is entitled "Comparing OER to Alternative Models." (NOTE: I have attached the section of the report containing that table to this email for your reference.) MHEC suggests the authors of your report consider adding MHEC's response herein to the footnotes.

MHEC's Response:

Most individuals shared concerns about the information in the table pertaining to inclusive access (the last row of the table). Specifically, they thought it was a mischaracterization of inclusive access when MHEC indicated that such materials were never available to students in perpetuity and never free from sharing students' personal data with the provider of the materials. Those who reached out to us offered that students can often opt-in to retain access to their course materials past the end of the term in which the associated course is taught. Similarly, there are apparently opportunities for students to opt out of having data about them and their use of the learning materials collected by the software in which the materials are housed.

We listened closely to these concerns and responded to those who brought them to our attention with the following question: Are the opportunities for opting out and opting in prominently and repeatedly made apparent and offered to students when they interact with the materials and the software in which the materials are managed? We received responses ranging from nonresponses to those who indicated that such opt out and opt in opportunities were highly variable depending upon the contract the institution has with the provider, the material sharing options selected by the faculty member, and how industriously students seek out such options themselves.

After careful consideration of these responses, MHEC decided not to change the wording in the table. First, we are unaware of any instances in which students are proactively made aware of such opt in and opt out opportunities, and those who raised their concerns to us could not provide us with any examples of such opportunities proactively offered to students. Thus, we determined that such opportunities are essentially moot. Second, the intention of the table is to demonstrate the unique value proposition of OER when compared to other affordability and accessibility learning material options. That unique proposition is that, unlike any other option, OER literally checks all the boxes and

offers advantages that exceed those of cost savings and convenience. Unlike inclusive access OER is always available to students in perpetuity, and no data about the students who use OER are ever collected. For a more comprehensive treatment of the benefits OER offers for students and faculty, please see the attached section of our report.

We are grateful to the Task Force for its work and welcome future opportunities to share our work at one your meetings. Please do not hesitate to reach out to MHEC if you have any questions about our work or publications.

Sincerely,

Jennifer Parks
Vice President
Midwestern Higher Education Compact (MHEC)
105 Fifth Avenue South, Suite 450
Minneapolis, MN 55401