Stacey Slijepcevic
U.S. Department of Education, OPE
Open Textbooks Pilot program
400 Maryland Avenue, S.W., Suite 268-32
Washington, DC 20202

Dear Ms. Slijepcevic:

On behalf of Higher Learning Advocates, a bipartisan non-profit organization that advocates for solutions to break down systemic barriers and support the success of today's students in their pursuit of education and skills development beyond high school, I am writing to comment on the U.S. Department of Education's (ED) Notice of Proposed Rulemaking (NPRM) on the Open Textbook Pilot proposed priorities, requirements, and definitions (Docket ID ED-2020-OPE-0031).

Open educational resources (OER) are digital media, textbooks, and other materials that have been made available to the public—including college students—under an open license on a free and accessible platform. Institutions that have adopted OER courses or programs have seen higher engagement, retention, and completion rates. Faculty and institutions are interested in adopting OER, but the startup costs and finding sustainable funding streams can pose barriers to its implementation.

Higher Learning Advocates believes it is critical to have access to digital educational materials now more than ever. Not only do students face high prices for course textbooks and materials, they may no longer have physical access to bookstores or libraries in light of the COVID-19 pandemic, or they may have left their materials on campus during spring break, not knowing that they would not return. At community colleges, textbook costs can account for up to 80 percent of the cost of attendance, and a study found that 70 percent of college students said that they skipped buying textbooks due to the price. Instead, students may rely on sharing a classmate's textbook, borrowing a copy of the text from the professor, or renting textbooks through the campus library. OER directly responds to these costs' pressures on today's college students.

In Fiscal Year 2018, Congress authorized the Open Textbooks Pilot program at ED. The program allows institutions to expand access to open educational resources for high-enrollment courses or in-demand fields. As ED is currently updating the Open Textbooks Pilot program rule, we want to express our support for the following:

- Topic (2) Matching Requirement – ED is considering whether to establish a matching requirement for grantees. We support a matching requirement to further leverage resources for this program with a waiver for institutions that are resource challenged. Institutions that have less resources to pledge to support a pilot program should not be disadvantaged, especially at a time when budget pressures will be extreme for all institutions.
- Topic (3) High Enrollment – The proposed revisions broaden the definition of "high-enrollment courses" to include courses in a recognized postsecondary

credentialing pathway, as well as increases the benchmark for high-enrollment courses and programs to course and program enrollments within, at least, the top third of all courses and programs offered within the institution. We want to express our support of this specific proposed change.

- Topic (4) Open Textbook – We agree with ED that the learning resources marketplace has evolved beyond single textbooks to include supporting digital resources. And in order to meet the needs of students and educators in higher education, we support ED's intent to broaden the definition of an "open textbook" by extending qualifying materials to other learning exercises, technology-enabled experiences (e.g., simulations), and adaptive support and assessment tools.
- Priority (1) Improving Collaboration and Dissemination – Establishing a priority to encourage greater collaboration and dissemination among institutions and other entities that are involved in OER. As ED articulates, this priority will promote the development, implementation, and use of existing openly licensed resources, but also provide critical professional development for instructors and faculty connected to open textbooks. We support this priority.
- Priority (2) Gaps in the Open Textbook Marketplace and Bringing Solutions to Scale – Expanding the reach of OER through the pilot is critical. Too often there are gaps in what areas open textbooks cover and expanding existing efforts to scale has proved challenging. We support the establishment of this priority to address this important issue.

In closing, we reiterate our support for these important topics as you continue to improve and update this critical pilot program. Thank you for the opportunity to comment on this NPRM.

Sincerely,

Julie Peller

Executive Director