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April 25, 2018

The Honorable Betsy DeVos
Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington D.C. 20202

Dear Secretary DeVos:

On behalf of SPARC, a coalition including more than 200 academic and research libraries spanning nearly every state, I write to provide our recommendations concerning the implementation of \$5 million Open Textbook Pilot funded in the Fiscal Year 2018 omnibus appropriation bill. SPARC has been working for more than a decade to make open the default for research and education, and our member libraries have extensive experience running projects at institutions of higher education creating new open textbooks and expanding their use. We strongly support the Congressional appropriation for the Open Textbook Pilot, and hope that our recommendations will be helpful as the Department considers how to implement the program to best support its intent to achieve savings for students, while maintaining or improving instruction and student learning outcomes.

Textbook costs are a critical and often overlooked financial barrier for college students. College textbook prices have risen 88% over the last decade, despite the availability of alternatives such as used books and renting options.¹ Many students report having to forgo buying a textbook for a course because it is simply too expensive, or they take on additional debt to afford buying their books. Now that so much information is available in digital form, there is an opportunity to expand the creation and use of open textbooks: high-quality, freely available textbooks that can be downloaded, edited and shared to better serve all students. In addition to being freely available to students, these resources carry an open license allowing professors to tailor textbooks to better suit their courses and local contexts. Studies have shown that students do as well or better in open textbook courses than students in courses using a traditional textbook.²

¹ Bureau of Labor Statistics:

<https://www.bls.gov/opub/ted/2016/college-tuition-and-fees-increase-63-percent-since-january-2006.htm>

² Fischer, L., Hilton, J., Robinson T. J., & Wiley, D. (2015). "A Multi-institutional Study of the Impact of Open Textbook Adoption on the Learning Outcomes of Post-secondary Students." *Journal of Computing in Higher Education*. <http://openedgroup.org/review>

Libraries are on the front lines of helping students find affordable textbooks, and in assisting faculty as they choose and create appropriate and affordable materials for their courses. Because libraries are tasked with providing the best and most up-to-date information for students and faculty to do their work, libraries understand the fundamental power of open textbooks to help make higher education affordable and attainable. As such, libraries have been responsible for leading some of the most successful programs to create and expand the use of open textbooks in the country, which have generated tens of millions of dollars in savings for students.

As the Department begins the process of implementing the Open Textbook Pilot according to the conditions set forth by Congress, SPARC offers the following recommendations for effectively supporting projects at institutions of higher education that create new open textbooks or expand their use in order to achieve savings for students while maintaining or improving instruction and student learning outcomes:

1. Prioritize open textbooks for high-enrollment undergraduate courses to maximize student savings. The single most effective strategy to achieve the greatest savings for students is to focus on courses that can impact the greatest number of students.

High-enrollment, introductory courses for undergraduate programs not only tend to have the most expensive textbooks, but they also have the potential to reach the largest number of students. For example, Texas A&M University enrolls more than 3,000 students per year in its BIOL 111 course, and by switching from a nearly \$200 textbook to an open textbook, the Biology Department expects to save students more than \$600K per year.³ Prioritizing high-enrollment subjects throughout the grants can help achieve the greatest savings for students.

2. Prioritize improvement of existing open textbooks over creating new ones in order to efficiently reach more students. Creating new open textbooks can be resource intensive. Instead, much can be done to make existing open textbooks easier to adopt in courses for students' benefit. One of the unique benefits of open textbooks is that they can be legally and technically adapted, which takes far fewer resources than it would take to write a whole new book. Since the funding for FY18 is limited, prioritizing improvements and adaptations that could allow open textbooks to reach broader audiences would be a good way to stretch the funding as far as possible. Improvements could include the following:

A. Adapt existing open textbooks for new markets. One key strategy is to take popular open textbooks and create adaptations for specific audiences or alternate pedagogical approaches. For example, a psychology open textbook written for a four-year majors audience could be adapted for a technical school with mostly

³ http://www.science.tamu.edu/news/story.php?story_ID=1891#.WtDdedPwa9t

non-majors, or a late transcendentals calculus textbook could be adapted to an early transcendentals one.

B. Make open textbooks more accessible. Another important way to expand the efficacy and use of existing open textbooks is to make them more accessible to students with disabilities. Challenges around accessibility exist for all kinds of digital course materials, regardless of whether they are from a major traditional publisher or an open publisher. However, open textbooks offer an advantage because they are free of legal and technical barriers often present with traditional materials, which empowers campuses to more easily adapt open textbooks to accommodate students with disabilities. Moreover, because open textbooks can be freely shared, efforts to enhance accessibility can benefit *all* students, in addition to those who qualify for assistance. For example, an audio version of a textbook created for students with impaired vision may also be helpful to those who learn better by listening.

C. Create supplemental materials for open textbooks to make them easier to adopt. One of the most common questions that librarians receive about open textbooks is whether they come with supplemental teaching materials, such as powerpoint slides, test questions, homework software, or labs. These kinds of supplemental materials save time for instructors and help them teach more effectively, but they are not always readily available for every textbook. Projects that help create and centralize openly licensed supplemental materials can make open textbooks easier for faculty to adopt and teach with, which will help both save students money and maintain or improve learning outcomes.

3. Support professional development for faculty and librarians. While many open textbooks can be used exactly like traditional textbooks, open materials present many new opportunities to engage in new teaching, learning, and publishing practices that improve student outcomes. For example, faculty can choose to update open textbooks with new information or locally relevant sources, or they can engage students in helping to annotate or improve the content. Similarly, librarians play a central support role in working with faculty to identify, curate, and deliver to students high quality collections of open resources. Professional development grants could support faculty and librarians to engage in the search for and review of open textbooks, the creation or adaptation of open textbooks, and development or improvement of tools and informational resources that support the use of open textbooks in order to achieve savings for students.

4. Award grants directly to institutions, and leverage existing consortia to reach a larger number of campuses. Since the funding is intended to support programs to institutions of higher education, we strongly recommend limiting eligibility to institutions of higher education or groups of institutions of higher education, as opposed to third parties. In particular, we encourage the Department to prioritize consideration of existing consortia or systems of institutions, since many are already effectively working together to advance open educational

resources, including sharing resources, best practices, and professional development opportunities with each other. For example, Georgia's public colleges and universities have saved students more than \$20 million through the expanded creation and use of open textbooks and other open educational resources under the Affordable Learning Georgia program.⁴ Prioritizing groups of institutions is also an effective strategy to implement the directive from Congress to give special consideration to projects that have the greatest potential to achieve savings for students at institutions outside the grant recipient.

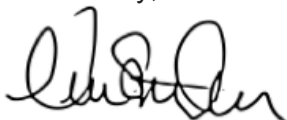
5. Ensure that grant deliverables are openly shared with the public. Because the objective of this pilot is to achieve the greatest level of savings for students, it is important to ensure that both the materials created and the best practices developed through these grants be shared widely so that students at other institutions can benefit from them. In addition to the requirements under 2 CFR § 3474.20, we encourage the Department to require grantees to submit a report at the conclusion of the grant with the following elements, and to make these reports openly accessible to the public:

- A description of the effectiveness of the project in expanding the use of open textbooks and in achieving savings for students at the entity receiving the grant.
- A description of the effectiveness of the project in expanding the use of open textbooks and in achieving savings for students at other institutions of higher education.
- Detailed information on where the public can access a machine-readable copy of each open textbook and supplemental material created or adapted using grant funds.
- An evaluation of the impact of the project on instruction and student learning outcomes.
- A summary of all project costs, including the value of any volunteer labor and institutional capital used for the project.

Many of these recommendations are derived from successful state and institutional-level programs, including those in Georgia, North Dakota, and Washington that have saved students more than ten times the investment. SPARC's recommendations are designed to help the Department achieve a similar return on investment from the \$5 million provided by Congress, which has the potential to save students \$50 million or more over the coming years.

SPARC would be happy to provide further information or recommendations as the Department moves forward with the implementation of this appropriation. Please do not hesitate to reach out if we can be of assistance.

Sincerely,



Nicole Allen
Director of Open Education

⁴ <https://www.affordablelearninggeorgia.org/about/reports>

cc: Adam Kissel, Deputy Assistant Secretary for Higher Education Programs, Office of Postsecondary Education, U.S. Department of Education
The Honorable Roy Blunt, Chairman, Senate Appropriations Subcommittee on Labor, Health and Human Services, Education, and Related Agencies
The Honorable Patty Murray, Ranking Member, Senate Appropriations Subcommittee on Labor, Health and Human Services, Education, and Related Agencies.
The Honorable Tom Cole, Chairman, House Appropriations Subcommittee on Labor, Health and Human Services, Education, and Related Agencies
The Honorable Rosa DeLauro, Ranking Member, House Appropriations Subcommittee on Labor, Health and Human Services, Education, and Related Agencies