



**UNIVERSITY OF MASSACHUSETTS
AMHERST**

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TO: Robert L. King, Assistant Secretary for Postsecondary Education, Department of Education

FROM: Simon Neame, Dean of Libraries
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DATE: April 28, 2020

RE: Comments on the Fund for the Improvement of Postsecondary Education – Open Textbooks Pilot Program (ED-2020-OPE-0031)

Thank you for the opportunity to comment on the Department of Education's proposed priorities, requirement, and definitions for the Open Textbooks Pilot program conducted under the Fund for the Improvement of Postsecondary Education (FIPSE). We write as one of the earliest open education university programs in the country, and submit comments below on the "proposed priorities".

The University of Massachusetts Amherst Libraries (Libraries) has been at the forefront of open education since the creation of our Open Education Initiative (OEI) in 2011, one of the earliest in the country. Since that time, we have saved UMass Amherst students over \$1.8 million dollars in textbook costs with an investment of just under \$140,000. The goals of our program are as follows:

- Raise faculty awareness of OER
- Provide small incentive grants to faculty who adopt, adapt, or create OER
- Encourage faculty to include diverse voices and perspectives in their course materials
- Provide materials at no cost to students, thereby increasing student success, retention, and graduation rates

Since 2011, we have learned several key lessons that have contributed to the success of our OEI program:

- Faculty need incentives to take time from their regular schedules to work on developing OER materials.
- Partnerships between instructional support units in instructional design, technology, and the library are necessary for successful projects.
- The creation of an ongoing assessment program to track successes and challenges of projects is very useful for future decision making.

In 2018 the Libraries were funded by the Massachusetts Department of Higher Education (DHE) to lead a 1-year statewide effort to further the development of OER throughout public higher education by leading several regional workshops for faculty and campus support units across the state. This endeavor continues today in the form of the Massachusetts OER Advisory Council, a DHE-supported group with

representation from all public higher education sectors; which is tasked with encouraging and supporting the adoption, adaption, and creation of OER across the state. The Council will also explore barriers to OER use and provide concrete recommendations to the state.

COMMENTS:

1. Award size: The Libraries support the revision to the Open Textbook Pilot program to include a range of award sizes. This will enable multiple types and sizes of institutions and consortia to apply and the revision matches the original vision of this program. We recommend that the project period be reduced from 48 months to 24 – 36 months to disseminate project results to the public in a timely fashion for the broadest impact.
2. Matching contributions: Understanding that this document was created prior to the COVID-19 pandemic, we note that a matching requirement may not be appropriate at this time. Such a requirement may have the unintended consequence of reducing this program's impact during the next 2 – 3 years due to tightened budgets. We urge that consideration be given to the effects of a matching requirement on both higher education and the industrial sector.
3. High enrollment: To date, the Libraries have seen the most dramatic impact of Open Textbooks in high enrollment, general education courses. There is now increasing interest in the creation of materials for required courses in “credentialing pathways” for a major program of study. This provides additional savings for students as they continue their studies, providing additional incentive for them to graduate. Therefore, we agree with the expanded definition of high enrollment.
4. Open textbook definition: The Libraries agree with the broadened definition of open textbooks to include a variety of supporting / supplemental digital materials. We encourage the use of a CC-BY license be more explicitly stated as the preferred license and that the use of Public Domain content be added to the definition.

Proposed Priority 1 – Improving Collaboration and Dissemination

Based on the Libraries' experience both at the campus level and in leading a consortium effort in MA, we agree in general with the need to build partnerships both within and among institutions. We recommend that the list of “must haves” include an instructional designer to assist faculty with pedagogical development. We also recommend that the business sector / trade association constituents be referred to as advisory members or perform in an advisory capacity since their time can be constrained, impacting their ability to fully participate. This change also aligns this section with the later Proposed Requirement section of the document that defines eligible applicants.

Proposed Priority 2 – Addressing Gaps in the Open Textbook Marketplace and Bringing Solutions to Scale

The requirements in this section are quite extensive, with six criteria that need to be included in a comprehensive plan. Given the current constraints caused by COVID-19 and related economic disruption, we recommend building in additional flexibility. For example, the plan could include five of the six elements with a clear rationale. This additional flexibility may prove especially important if this grant cycle includes a number of smaller grants.

Proposed Priority 3 – Promoting Student Success

The Libraries strongly agree with the 4 points in this priority in order to achieve the highest level of savings for students. We would like to see wording that reflects the prioritization of diversity, equity, and inclusion as a measure of success of open textbook pilots.

Proposed Priority 4 – Using Technology-Based Strategies for Personalized Learning and Continuous Improvement

The Libraries have concerns about this proposed priority focus on AI and personalized learning strategies. These particular tools are expensive to develop and maintain and would exacerbate the Department of Education's stated concerns / challenges with the development and continuous updating necessary for the content layer. Using AI and other tools may not necessarily be the most effective way to achieve cost savings and there may be pathways other than personalized learning strategies that achieve better outcomes. Rather than limit to AI and personalized learning strategies as an absolute or a competitive preference priority, we recommend that these be considered an invitational priority.

We appreciate the opportunity to submit these comments regarding the proposed priorities, requirement, and definitions for the Open Textbook Pilot and look forward to reviewing the Call for Proposals later this year.

We are happy to answer any questions you may have regarding our comments.