November 13, 2017

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

Proposed Discretionary Grant Priorities and Definitions (Docket ID ED-2017-OS-0078)

Dear Secretary DeVos:

Thank you for extending this opportunity to comment on the U.S. Department of Education's proposed discretionary grant priorities and definitions. Our organizations strongly support the Department's decision to highlight open educational resources (OER) as part of "Proposed Priority 6, Promoting Science, Technology, Engineering, and Math (STEM) Education, With a Particular Focus on Computer Science." We encourage you to maintain Priority 6's focus on OER when the Department publishes and implements the final priorities.

OER offer important advantages for students and teachers. OER enable teachers to adapt and customize materials to meet their students' specific learning needs, consistent with the "personalized learning" and "personalized path for learning" described by the Department as part of the discretionary grants public notice. This flexibility has broad benefits, but can be especially helpful to students transitioning to new schools or learners that are performing above or below grade level. Openly licensed materials can also stimulate innovative content development partnerships among teachers and create new pathways for engaging students. Notably, because OER can be freely shared, these and other advantages extend well beyond the nation's traditional public schools to students and teachers in nearly every other educational setting.

Across the country, state and local OER initiatives are promoting greater access to high-quality, up-to-date, and standards-aligned materials that students need to prepare for success after graduation. Far too many poor, disabled, and other marginalized students, however, continue to lack access to the world-class materials they need to be successful. Adding the OER priority to future discretionary grants will help address this long-standing problem by encouraging a faster and broader national transition to OER. Importantly, the priority also makes sound fiscal sense, by ensuring that future public investments in educational resources achieve their greatest possible return on investment, by maximizing the number of students that have access to them and graduate ready for later academic, work, and life success.

Promoting open educational resources adoption and use through relevant Department competitive grants fits squarely with your overarching vision for "ensuring equal access to the

high-quality, affordable education every American student deserves." It also comports with the Department's new open licensing requirements for competitive grants and echoes Congress' bipartisan decision to make investments in openly licensed materials an allowable investment of the Every Student Succeeds Act's largest competitive grant program, the Student Success and Academic Enrichment Grant. Together, these policy improvements provide valuable direction and support for state and local leaders working to launch and cultivate OER projects that will benefit countless students.

We commend the Department for recognizing OER's growing role in strengthening and expanding educational opportunities and urge you to maintain this valuable strategic focus in the final discretionary grant priorities. Encouraging grantees to propose OER initiatives, through absolute, competitive or invitational priorities will make a meaningful difference for learners in all settings. If you have any questions about our recommendations, or existing state and local OER models and practices, please let us know.

Sincerely,

Alliance for Excellent Education

Consortium for School Networking

Council of Chief State School Officers

Creative Commons

EdTech Strategies, LLC

iNACOL

Michigan Association for Computer Users in Learning

National Association of State Boards of Education

New America, Education Policy Program

OpenStax, Rice University

SPARC

State Educational Technology Directors Association

USPIRG