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The Higher Education Funding Committee
North Dakota Legislative Assembly
State Capitol
600 East Boulevard
Bismarck, N.D. 58505

Re: Open Textbooks in Higher Education

Dear Members of the North Dakota Higher Education Funding Committee:

I am writing to you on behalf of the members of the Association of American Publishers (AAP) Higher Education Committee regarding the use of open textbooks in North Dakota institutions of higher education. We appreciate the opportunity to bring a few issues of concern to your attention.

We understand that the Higher Education Funding Committee has been studying the use of open textbooks for higher education academic courses. We applaud your attention to this issue and we would like to take this opportunity to comment on several issues relating to higher education textbooks:

- (1) The widely-argued point that higher education textbooks place an undue financial burden on college students;
- (2) Questions concerning the quality and actual faculty/student usage of “free” open source higher education materials; and,
- (3) Concerns that, frequently, open source materials are not accessible to persons with disabilities.

It is often argued that the costs of higher education textbooks place significant financial burden on college students. However, it is important to recognize that students’ financial burden is also a result of the high cost of tuition, room and board. Higher education is expensive to provide and to receive, and textbooks are but one part of this. To put these costs in perspective: according to the National Center for Education Statistics (an entity within the U.S. Department of Education), students faced the following costs when studying at North Dakota institutions, 2013-14:

- North Dakota State University
 - Tuition, room and board: \$14,960 (3.5% increase over 2012-2013)
 - Books and supplies: \$1,100 (0% increase over 2012-2013)
- Dickinson State University
 - Tuition, room and board: \$11,428 (3.3% increase over 2012-2013)

- Books and supplies: \$1,100 (0% increase over 2012-2013)
- Lake Region State College
 - Tuition, room and board: \$9,307 (3.9% increase over 2012-2013)
 - Books and supplies: \$1,000 (0% increase over 2012-2013)

According to Student Monitor, which provides syndicated and custom market research services focused exclusively on the college student market, the average spend by students for textbooks (including e-textbooks, used textbooks and rentals) during the 2013-2014 academic year was \$520. When only new, printed textbooks are considered, the average spent by students during the 2013-2014 academic year was \$245. In fact, according to Student Monitor, student spending on textbooks has declined: since Spring of 2010, student spending on printed textbooks has declined by 31 percent and across all formats (including e-textbooks and rentals) by 17 percent. As noted in the National Center for Education Statistics numbers mentioned above, there was zero increase in the costs of books and supplies for North Dakota students at North Dakota State University, Dickinson State University or Lake Region State College.

Contrary to popular belief, there is nothing free about open source textbooks. OpenStax, a leading publisher of open source textbooks, spent \$500,000 to develop one of its recent textbooks. Publishers of copyrighted textbooks routinely spend between \$500,000 to \$3 million to develop new and, in some instances, revise existing textbooks. Other types of open source educational materials can also be very expensive to develop, revise and maintain (including the cost of 24-hour help centers to facilitate use of interactive digital materials). Where institutions of higher learning are producing these materials and shouldering these costs, it is questionable what savings, if any are passed through to students (who will likely be paying for these textbook development costs through their tuition and fees).

The high cost of textbook publishing is attributable to the labor intensive nature of development. For example, it took 13.8 person years of work to develop the seventh edition of the Campbell/Reece Biology textbook. That included 7,000 hours of research and writing by authors and contributors; 8,800 hours spent by developmental editors reading multiple drafts of revised chapters, querying authors, synthesizing faculty feedback and crafting the layout of each page; 2,630 hours spent by developmental artists evaluating every figure in the text and creating sketches for new and improved figures; 3,300 hours spent by production editors to typeset, create page layout, check and proofread pages, revise pages and create final files for the printer; 1,000 hours spent reviewing the final pages; and reviewing for accuracy and currency by 245 biologists of all 55 chapters of the book.

As you continue your study of open textbooks, we ask that you compare digital resources to digital resources, rather than the apples-to-oranges comparison of hardcopy textbooks to open source digital resources. In 2007, AAP publishers established Coursesmart.com to provide students with affordable digital textbooks. Virtually every printed textbook published by our members is available on Coursesmart.com in a digital format. At that site, a student can rent six digital textbooks for \$200 per semester (less than \$34/textbook).

Another area of concern is the question of quality and usage of open source textbooks. Oregon's Higher Education Coordinating Commission released a study in December 2012 which found that:

- "Nationally, instructors have had concerns about the quality of many of these free and low cost materials, and only a small percentage of instructors have chosen to use open source textbooks." (p. 16)

- “Except for the two publications from OpenStax College, the quality of the texts examined was erratic, and the materials were sometimes difficult to manage.” (p. 17)
- The study identified a particular open source textbook and complained that “it had typographical errors, the links to some videos did not work, and the printed version used by the reviewer fell apart before she finished reading it.” (p. 19)

Washington State provides another cautionary example. In 2009, the Washington State legislature appropriated \$750,000 (with a matching grant from the Bill and Melinda Gates foundation for another \$750,000) to create an Open Course Library (OCL) for the state’s community college system. By the Fall Quarter of 2013, open source materials were available for 42 of the most enrolled courses in the system. However, according to a survey conducted by OnCampus Research, the use of any recommended OCL materials was extremely limited: only 2.7 percent of the students enrolled in those courses in the fall of 2013 were assigned materials from the OCL. So far, the \$41 million in student savings promised by the proponents of the OCL have not materialized.

Finally, unlike the learning materials published by the members of the AAP Higher Education Committee, many open source learning materials are not accessible to persons with disabilities. Any studies conducted by your committee should also examine opportunities for persons with disabilities to access appropriate learning materials.

Again, thank you for the opportunity to present our points of concern. I hope that the above discussion is helpful in any analysis of open textbooks for the students of North Dakota. I am happy to provide more explanation or resources as needed. Please feel free to contact me any time at the phone numbers and email address above.

Sincerely,



David E. Anderson