Massachusetts Department of Higher Education

Course Marking Implementation Guidelines

Developed by the Course Flagging Committee of the OER Advisory Council

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Introduction and Motivation

Open Educational Resources (OER) and their no-cost and low-cost alternatives allow students and faculty to access diverse, inclusive, and equity-minded instructional materials catering to their demographics, values, needs, and academic goals. Of course, they can also save students money. The Board of Higher Education and the Department of Higher Education staunchly supports developing an environment that promotes creating, modifying, and adopting instructional resources. Course marking benefits students because they will be able to identify no-cost and low-cost courses easily. Through course marking, the Department of Higher Education can also collect voluntary information that can be used to expand programs and secure funding for the future.

The Course Marking Implementation Guidelines are focused explicitly on instructional materials: Open Educational Resources (OER) and their no-cost and low-cost alternatives. They do not include other items required to take courses, like lab coats, art supplies, computers, calculators, etc. Although the Course Flagging Committee understands that these costs can be challenging to students, it is not within the scope of the DHE OER Advisory Council.

What is OER, and how did it come to Massachusetts?

The effort to create course marking of Open Educational Resources (OER), both nocost and low-cost, throughout public higher education is being pursued, in part, because the Massachusetts Board of Higher Education voted unanimously on October 22, 2019 (AAC 20-03), to adopt this recommendation and encourage its implementation. The Board vote noted, "OER courses should be designated in the course management systems for all public higher education so that the use of OER may be encouraged by faculty and students, and tracked and reported" (Mass. DHE, 2021).

The term Open Educational Resources (OER) has a precise meaning. The Board of Higher Education adopted this definition of OER on October 22, 2019:

Open Educational Resources (OER) are teaching, learning and research materials in any medium – digital or otherwise – that reside in the public domain or have been released under an open license that permits no-cost access, use, adaptation, and redistribution by others with no or limited restrictions.¹

¹ Open Educational Resources | UNESCO. (n.d.). Unesco: Open Educational Resources. Retrieved January 11, 2024, from https://www.unesco.org/en/open-educational-resources

What is Course Marking?

Course marking (a.k.a. course flagging) is "the process of assigning specific, searchable attributes to courses" (Ainsworth et al., L. (2020). The Higher Education Opportunity Act (HEOA) of 2008 requires publishers to disclose certain information about textbooks and supplemental materials to faculty members as they decide what books to require. Publishers must disclose (1) the textbook's price in all its available formats (i.e., paperback, or unbound), (2) the copyright dates of the textbook's three previous editions, and (3) the substantial content revisions made between the book's current and previous editions. Publishers that sell textbooks bundled with supplemental material must also make the items available separately. Finally, higher education institutions are required to enact, to the maximum extent, online course schedules used for preregistration and registration. A logical extension of this federal requirement would be to designate OER courses in institutional course management systems that will serve the same purpose: informing students of textbook costs before they enroll.

Therefore, it is imperative that institutions develop a system that will identify which courses are OER to encourage students to enroll in these courses and to identify course type, i.e., those that are no-cost (including OER) versus those that are low-cost (i.e., cost \$50 or less) versus traditional textbooks. It will also encourage faculty to select OER materials – if they believe it is the best alternative for students – to meet the demand of students for free and low-cost teaching and learning materials. A meta-study conducted by North Dakota State University suggests that there was no significant difference in educational outcomes between students who used traditional textbooks and OER textbooks (Clinton & Khan, 2019). That means that the use of OER materials has a comparable learning impact to traditional materials. This challenges an existing canard that OER materials were easier and less challenging. However, they have an appreciable reduction in costs for students (Ashford, 2018; Marshall, Awkward, & Texiera, 2019; St. Amar, 2020). In fact, there are several studies (Colvard, Watson, & Park, 2018; Ashford, 2018; Griffiths, R., Mislevy, J., Wang, S., Shear, L., Ball, A., & Desrochers, D., 2020) that suggest that student learning improved in courses using OER.

Finally, our ability to establish and implement key performance indicators to track, measure, and assess the cost, outcomes, usage, and perceptions of OER requires course marking in order to know whether no-cost (including OR) and low-cost resources are being utilized in what classes/sections and to discern the cost savings and the impact on student learning, equity, and completion.

Massachusetts Voluntary Guidelines

The OER Advisory Council, through the leadership of the OER Course Flagging Committee, developed these Implementation Guidelines. Its purpose is to guide Massachusetts public institutions of higher education based on the experiences and



best practices of the thirteen Massachusetts public institutions that have already developed course marking systems and from the Washington (State) Community and Technical Colleges System and the Community College System of New Hampshire, which have published similar guidelines. These are recommendations, not requirements. We recognize that each institution is unique and must develop, adopt, and adapt this higher education practice based on its unique culture, faculty, students, and resources.

Since the original implementation of this guide in 2022, SPARC has tracked the growth nationwide of OER and affordable learning strategies across the nation. SPARC has set up an OER State Policy Tracker on their website to monitor actions of states, and their OER policies, legislation, grants, funding, or other resources. This shows promise for a nationwide effort to expand OER and their low-cost and no-cost alternatives. Course/section marking is an essential component in the widespread adoption of OER, which in turn has the capacity to:

- reduce course instructional materials costs (the third highest cost for students after tuition and fees, and room and board).
- · address issues of inequity.
- increase affordability.
- improve student learning.
- ensure all students can access learning materials on the first day of class.
- improve student success (i.e., persistence and completion).

Designating a course/section as OER within a course marking system should be included among the other elements employed by public institutions of higher education to address equity, student success, and completion. Implementing and maintaining a course marking system will require an investment of time and resources for each institution. However, the data suggests that the return on this investment will be significant in student cost savings, as well as in revenues from increased enrollments and improved retention. In FY22, based on 17 out of 28 undergraduate-serving institutions reporting, we saved students over \$7.6 million (OER Advisory Council Presentation to the BHE Academic Affairs Advisory Council, 2023). In FY23, based on 26 out of 28 undergraduate-serving institutions reporting, we saved students over \$15.6 million. Even when you compare the same 17 institutions year-to-year, the savings increased from \$7.6 to \$9.1 million. Further, OER utilization increased from 15% in FY22 to 20% in FY23 (OER Advisory Council Presentation, 2024). Further, in two key measures of enrollment intensity, an indicator of student progress toward graduation, students in courses that used OER enrolled in a significantly higher number of credits the next semester than those with commercial textbooks (Fischer et al., 2015).

For this guideline's purposes, a course is a teaching unit lasting one academic term. A course usually covers an individual subject like English, history, etc. There can be



multiple offerings of the same course during an academic term that differ in location, time, instructional materials, students and other attributions. These differences are called sections. The use of sections allows the institution to offer more courses/classes/subjects to ensure more students are being served. Institutions may use other terms for this process, but most of the public institutions in the Commonwealth use this system of course/sections.

Designation Types

For all designation types, instructional materials are defined as:

 Textbooks, journal articles, documents, eBooks, websites, software programs, apps, courseware packages, access codes to homework sites

Instructional Materials do not include:

- Tools and supplies cost, such as a lab coat, goggles, notebook paper, art
 materials, thumb drives, or calculators. <u>Note:</u> Although the Course Flagging
 Committee understands that these costs can be challenging to students, it is not
 within the scope of the DHE OER Advisory Council.
- Auxiliary fees such as lab fee, technology fee, or eLearning fee

Automatic Textbook Billing (e.g., Universal, Inclusive Access or First Day programs)

The OER Advisory Council members are concerned about the rising costs of instructional materials and want to provide students with transparency and equity. Council members have recommended OER (i.e., no-cost) resources in contrast to publisher-sponsored Inclusive Access and/or First Day programs. To decrease the rising costs of instructional material for students, we have determined that inclusive access or first-day programs may be included in course marking if they are selected at the course level by faculty members and meet the no- or low-cost criteria. Allowing decisions to be <u>faculty-driven</u> while providing cost savings to students is the goal.

 Universal (campus or department-wide) programs are not considered open or low-cost.

No-Cost: OER, Open, Free, and Library Resources

These instructional materials are free for students but may have a cost for the institution, like library resources or grant-funded materials. Open could be open software, or open access journals that don't meet the criteria of OER or Creative Commons Licensing.



Type Description

The required instructional materials are provided online at no cost (i.e., free). An optional printed version and some supplementary course instructional materials may be available for purchase. This designation includes Open Educational Resources, No Cost, and library resources. Institutions may elect to separate the designation types to provide specificity to students. We have combined the types of no-cost instructional materials for this guide's purposes and for ease of implementation.

Type Criteria

To be designated as an OER/No Cost/Library Resources course/section, a course/section should use the following as the primary, required instructional materials for the course:

OER: Open Educational Resources are instructional materials released openly (Creative Commons licenses) or in the public domain.

No-Cost: Instructional materials are provided to students at no cost. No-cost instructional materials are funded by grants, institutional funding models, or a compilation of materials that are not traditional OER.

Library Resources: A high percentage of simultaneous user resources that is readily available for the number of students enrolled including eBooks, digital journal articles, streaming films, etc. This percentage is determined by the institution and should ensure that students are not without resources.

Qualified Cases Labeled as OER

- OER resources that are free but are not adaptable (e.g., have a CC-ND component to the license).
- Use of adopted or adapted open textbooks or instructional materials regardless
 of the format, e.g., course/sections that use an optional printed version of open
 textbooks or instructional materials with a small printing and handling cost.
- Use of faculty-developed textbooks or instructional materials with an open license or public domain designation.
- If instructional materials are freely accessible by the students and students can keep them after the course is completed.
- The faculty plans to release the instructional materials with an open license or public domain designation when ready.
- Use open textbooks or instructional materials as required course materials.
 Before using supplemental copyrighted materials with all rights reserved, faculty should consult with OER experts on their campus. Faculty members are encouraged to locate or create an OER replacement.



- Use of a combination of OER and the campus library resources as required course materials if OER provides the primary foundation of the required instructional materials.
- A high percentage of simultaneous user resources that is readily available for the number of students enrolled including eBooks, digital journal articles, streaming films, etc. This percentage is determined by the institution and should ensure that students are not without resources.

Insufficient Cases Labeled as OER Course/Sections

- Use of OER as a supplementary course/section instructional material while using a commercial textbook as the primary course/section instructional material.
- Use of library-reserved text when a textbook purchase is required unless the reserves provide user resources (as specified above).
- Use of OER with software or online sites that require the purchase of software or licenses permitting the use of materials, e.g., if a student has to purchase an access code to do homework or read primary course/section materials, the section should not be designated as OER. It may be marked as Low-Cost if each student's course/section fee is \$50 or less.
- Publisher content provided through the universal Inclusive Access Program or First Day program is not to be marked with the OER code unless inclusive access is provided at the course level and meets the no or low-cost criteria.
- Third-party bookstore products such as BNC OER+ are not to be marked with the OER code unless the content is publicly available with clear terms of use that allow free public access. It may be marked as Low-Cost if each student's course/section fee is \$50 or less.

Note: If required material for a course/section cannot be evaluated using this OER marking criteria before registration, it should not be marked as a no-cost course.

Low-Cost (\$50 or less)

Although the Commonwealth of Massachusetts has set the voluntary low-cost at \$50, some colleges are choosing to set their own limits, with some using \$40 as their low-cost. For Key Performance Indicators (KPI) reporting, Massachusetts will use the \$50 threshold to calculate the low-cost savings.

Type Description

The required instructional materials cost \$50 or less.

Type Criteria

To be designated as a Low-Cost course/section, the combined cost of the course/section instructional materials should be \$50 or less. This marking designates courses/sections that use affordable instructional materials that do not conform to the OER/No-Cost/Library Resources criteria.



This includes all required instructional materials (definition above).

The \$50 or less threshold is based on the pre-tax retail price and is applied to all class sections regardless of the number of credits offered.

- The threshold is based on the price at the campus bookstore or charged by the publisher directly, whichever is lower.
- Prorating the book cost based on the number of credits or sections used is not recommended. For example, \$100 textbook spanning two semesters should not be prorated 50/50; thus, it should not be labeled as Low-Cost.

Consider the cost of new, used, rented, and older editions of the required instructional materials.

- For used, rented, and older editions to be included in the low-cost designation,
 - Students should be able to acquire the instructional materials for \$50 or less either from the college bookstore or the publisher directly, and
 - The college bookstore/ publisher should have sufficient stock for all enrollments. The faculty member should be advised to confirm this before assigning.
- Prices offered by other third-party vendors, such as Amazon.com, should not be considered due to price fluctuation and uncertainty of stock availability.

A lecture course with an associated lab section should be coded together if lecture courses are integrated with lab sections (i.e., lecture and lab are simultaneously registered into a single course).

- A combined cost for the required instructional materials from lecture and lab should be \$50 or less to be marked as Low-Cost. This excludes the lab fee and the cost of any supplies or equipment needed for the lab section.
- A lecture with a lab may be coded separately only if it requires separate registration with independent section numbers.

Examples of Courses Meeting the Low-Cost Threshold

- Use of an inexpensive commercial textbook costing \$50 or less.
- Use of a course material bundle (e.g., textbook and homework website) costing \$50 or less
- Use of a faculty-developed course package costing \$50 or less

Examples of Courses that Do Not Meet the Low-Cost Threshold

- Textbook costs \$50, and online homework site costs \$150.
- The textbook costs \$100 but is used for two courses in a sequence.



Course Marking in Practice: Recommendations

Course Marking or Flagging is not a simple process; it is iterative. Making OER sustainable in any institution is imperative and involves selecting critical stakeholders who can bring their knowledge and experience together to help form an OER implementation committee.

The OER Implementation Committee

Although the OER implementation committee may look different from institution to institution, here are some suggestions for the committee members:

- the state institutional OER Representative,
- administrator,
- registrar,
- librarian,
- · faculty member,
- faculty union leadership member,
- online learning staff,
- IT (Information Technology) staff,
- Institutional Research (IR),
- student,
- academic advisor.
- marketing department.

The role of gathering stakeholders is critical. First, higher education is a collegial culture where people work together to address challenges. Accordingly, this is an essential component to ensure the success of this project. Second, sustainable change only occurs when those affected are involved upfront and are responsible for the outcome. Third, the experience from Massachusetts public institutions that have implemented course marking is that a committee of stakeholders is essential for a successful implementation.

A four-year institution described the role of stakeholders as follows: "Our efforts were a combination; students requested assistance with rising textbook costs, faculty had a desire to provide equity – access for all, staff understood the importance of this topic, and administration provided funding and support to move this forward."

Once the committee is formed, it is essential to hold regular meetings, collect information, form a plan, and seek an understanding of how the institution operates. The Department of Higher Education Course Flagging Committee developed an <u>Action Plan</u> (Appendix D) to help institutions with this work.

First Steps of the Committee



The first step in the course marking process is to secure the approval and support of the Chief Academic Officer or Provost. Implementation of course marking will involve crossfunctional resources, financial support, faculty and student support. Thus, this effort must begin with academic leadership support as a means of: a) improving educational access and affordability for minoritized students, b) providing faculty additional resources for teaching and learning that can also be customized and made more accessible, and c) increasing all students success (i.e., affordability, improving academic performance, and increasing persistence and completion).

Creating a Sustainable Course Marking Process

Course marking is currently a manual, time-intensive process at all Massachusetts community colleges and universities. A best practice would be to have a dedicated staff member to manage and oversee the process (i.e., an institutional OER coordinator). Currently, there is no automation in the process. The manual process involves receiving the information from faculty, confirming with the bookstore, continuously monitoring course/section/faculty assignments, and the Registrar's Office uploading the information into the registration system. For the most part, staff in this type of role have had many different job responsibilities that they must perform on top of their OER ones.

Another primary requirement of the course marking process is the evaluation of whether the teaching and learning resources selected by faculty are no-cost (i.e., OER/free/library resources), low-cost, or traditional, which must continuously be done to ensure integrity in the course marking system. However, this manual process is also cumbersome, given changes in course, sections, faculty assignments, and faculty decision-making regarding their choice of teaching and learning resources. Thus, the guidelines clearly define what is and what is not no-cost or low-cost resources and how best to implement course marking so that it is accurate and sustainable given its value in contributing to student persistence and academic success.

Technology and Workflow

It is crucial for every institution to establish its own workflow. This can be achieved by collaborating with the Registrar's office, Institutional Research, the bookstore, and individuals who possess in-depth knowledge of how courses and sections are configured in the Student Information System (SIS). Here are a few suggestions to consider:

- Create a standard operating practice with the help of the Registrar's Office that aligns with when course assignments are due to them.
- Obtain a list of courses and sections.
- Determine a course type or attributes for the designations you would like to use at your institution.

- Create a survey to send to faculty, department chairs, deans, and academic support, requesting information about courses/sections. This might be a good opportunity to ask about other OER-related information as well.
- Request a list of courses and sections from the Registrar's Office. Cross check from the bookstore, check against the returned survey, and complete a spreadsheet.

This information should be kept on a shareable spreadsheet with others. Registrar offices have a good working relationship with Deans and Department Chairs and check in with them to review sections and changes to attributes, course types, and any changes in assignments. It's also important to remember that it's part of the OER Coordinator's job to make sure that the OER courses are correct, in partnership with Deans and/or the Department Chairs as necessary. Although, it's good to know that communication happens between the Deans/Department Chairs and Registrar's Office, it will still be the responsibility of the OER Coordinator to make sure OER courses/sections are flagged correctly.

How to keep practices sustainable

It is important to make sure that another person on the implementation committee or a direct supervisor knows where all the information is stored in case the OER Coordinator has left, is on vacation, or is on medical leave. Having another person who understands where to get the information is vital to the sustainability of the OER program, so no dates are lost.

Having the spreadsheets in the Cloud and available to others is important to the work as well. It can help with the ability to gather information quickly in case it is needed.

Since it is important to have an open channel with Institutional Research, it should be a practice to work with them to gather the information for the KPI's for the state.

Faculty and Professional Development

It is important to find training resources for faculty and staff on OER and no-cost and low-cost alternatives. These can be joint ventures with Teaching and Learning and libraries. Some things to consider might include:

- Creative Commons Licensing
- OER Commons
- Massachusetts Open Repository
- Open Textbook Library
- Free Digital Tools
- How to use Digital Annotation
- Using Open Pedagogy in your Classes.



It would also be helpful to work with your online learning team and with new faculty who are creating new online courses that may want or are already using OER/no-cost/library resources/low-cost materials.

This is a constant process, but an important one. Faculty and staff professional development helps with retention and renewed interest in OER and allows for more development of new materials to be used internally.

Reporting KPI's and knowing how to find the Massachusetts KPI Guide The OER Advisory Council also developed an OER Assessment KPIs Implementation Guide. This guide goes into detail on how to collect all data that is needed for the state. The first year that statewide OER data was collected in FY 2022. The Key Performance Indicators (KPI) use the COUP Framework, which uses cost, outcomes, usage, and perceptions (Bliss, Robinson, Hilton, & Wiley, 2013)

It is essential to read the guide to understand what is expected. Having someone from Institutional Research read it is also helpful, as they must collect the data and fill out the database requirements.

Closing

The Course Marking Implementation Guidelines will provide public higher education institutions with a roadmap based on best practices for implementing course marking. These guidelines, combined with the OER Key Performance Indicators, will provide a method to assess the impact of course marking at our public institutions.

Implementing course marking will make it easier for students to decide whether to enroll in courses using no-cost or low-cost instructional materials. Students will have the opportunity to lower their costs and increase their success. In addition, adopting OER Key Performance Indicators will enable each institution and the DHE to better assess the impact of the time, money, and effort placed into advancing the use of OER. As a result, we can more cost-effectively employ our resources to achieve the maximum return on our collective efforts and financial investment in this initiative.

Definitions and Terminology

Academic Record:

An official record of a student's course selections, grades, and credits earned toward a degree.

Average cost per textbook:

According to an article by SPARC (Scholarly Publishing and Academic Resources Coalition) the average cost per textbook is \$117 (SPARC, 2018). This is the number that Massachusetts will base textbook savings on.

Automatic Textbook Billing:

This is another name for Day One Access, Inclusive Access, plans that publishers have come up with to offset the rising use of OER Instructional Materials and their No-Cost and Low-Cost Alternatives.

Course-by-Course:

This term is used when instructional materials are selected by faculty and students pay per course. Opt-out is typically on a course-by-course basis. Institutions can negotiate prices with multiple vendors, this model is more often voluntary for faculty.

Course Marking:

When higher education institutions mark no or low-cost materials for students in the student information system.

"Also called attributes, designations, tags, flags, labels: specific, searchable attributes or designations that are applied to courses, allowing students to quickly identify important information to aid in their decision making and allow them to efficiently plan their academic careers. Course markings may include letters, numbers, graphic symbols, or colors and can designate any information about a course, including service-learning status, additional costs, course sequencing requirements, and whether the course fulfills specific general education requirements" (Ainsworth et al., 2020).

Courses:

A teaching unit lasting one academic term (see above).

Courseware:

Online instructional materials such as eBooks, videos, quizzes, interactive content, and other useful information. Usually, these materials can only be accessed for one semester.

Day One (also known as Inclusive Access):

Digital textbook content is delivered to students by the "first day," the cost is billed to students' tuition and fee bill or bursar account. After the course ends, students typically lose access to the content. Cost models can be charged Course-by-Course or by Equitable Access.

DFW rate:

is the percentage of grades of D or F or of students (W) withdrawing from the course.



Equitable Access (also known as Flat Fee):

Students are charged a flat amount based on how many units or credit hours they are taking per term, no matter what their specific instructional materials cost. Opt-out is typically all or nothing, all faculty must participate.

Flat-Fee:

see Equitable Access

Governance:

How institutions of higher education are formally organized and managed.

Inclusive Access

See Day One

Instructional Materials:

Textbooks, eBooks, websites, software programs, apps, courseware packages, access codes to homework sites.

Institutional Research (IR):

research conducted within an institution of higher education to provide information that supports institutional planning.

Library Resources:

A high percentage of simultaneous user resources that is readily available for the number of students enrolled including eBooks, digital journal articles, streaming films, etc. This percentage is determined by the institution and should ensure that students are not without resources.

Low-Cost Instructional Materials:

The required instructional materials per section cost under the threshold set by the institution at \$50 or less.

No-Cost Instructional Materials:

Instructional materials are provided to students at no cost (\$0). No-cost instructional materials are funded by grants, institutional funding models, or a compilation of materials, including Open Educational Resources (OER, see definition below).

Open Educational Resources (OER):

Are teaching, learning, and research materials in any medium – digital or otherwise – that reside in the public domain or have been released under an open license that permits no-cost access, use, adaption, and redistribution by others with no or limited restrictions (Source: Open Educational Resources. Retrieved June 18, 2019, from United Nations Educational, Scientific, and Cultural Organization Web site:

https://en.unesco.org/themes/building-knowledge-societies/oer) (David Wiley's Five R's - Retain, Revise, Remix, Reuse, and Redistribute).



Opt-in:

Students have the option to purchase instructional materials offered by the institution or bookstore.

Opt-out:

Students decide to forgo using instructional materials offered by the institution or bookstore. Often opt-out processes can be complex and not transparent. Opting-out may not be an option when materials are mandatory for online homework programs.

Professional Development:

This includes faculty and staff workshops, communities of practice, information sessions, and other activities related to OER.

Section:

There can be multiple offerings of the same undergraduate course during an academic term that differ in location, time, instructor, delivery mode, instructional materials, students and other attributes. These differences are called sections (see Courses).

Student Information System (SIS):

A student information system (SIS) is a software solution that allows institutions to store student information. Institutions have many software solutions to choose from. Here are some that are most used by public higher education in the Commonwealth of Massachusetts:

- Ellucian Banner
- Ellucian Colleague
- Anthology
- Jenzabar
- PeopleSoft

Students:

Undergraduate students, whether enrolled in the day or evening; online or in-person; and full or part-time.

Textbook:

see Instructional Materials

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Appendices

<u>Appendix A</u>: Massachusetts Public Higher Education: Course Marking Survey (June/July 2020).

This is a summary of a course marking survey provided to all Massachusetts public colleges and universities in 2020.

Appendix B: Course Flagging Case Studies Interview Summary

This is a summary of themes that emerged from course flagging interviews with Massachusetts public colleges and universities in 2020.

<u>Appendix C</u>: OER Course Marking Implementation Guidelines - Campus Feedback

Memorandum from Robert Awkward on May 25, 2021, documenting feedback received from Massachusetts public colleges and universities pertaining to the OER Course Marking Implementation Guidelines.

Appendix D Action Plan for Course Flagging

The Action Plan template was developed by the DHE OER Course Flagging Committee to help organize and guide OER advocates through the course flagging process.

Appendix E: OER Course Marking Faculty Survey Template

The faculty survey template was developed by the DHE OER Course Flagging Committee to help OER advocates create their faculty survey.

Appendix F: OER KPI Assessment Guide

The OER Assessment KPI Implementation Guide provides guidance to the public higher education institutions in the state of Massachusetts on suggested practices for collecting data and reporting progress to key stakeholders at their institution and to the Massachusetts Department of Higher Education (DHE) on Open Educational Resources (OER) used at each institution.