

# Statement on Automatic Textbook Billing Models

## Introduction

Automatic textbook billing models, including 'Inclusive Access' and 'Equitable Access' programs, are evolving digital textbook sales models in higher education. Already widespread in the United States, such vendor models are being discussed across Canada, although there are few campus-wide adoptions to date. While automatic billing models offer some advantages, this position statement outlines the important concerns that lead us to recommend against institutional adoption.

## Inclusive and Equitable Access Programs

An 'Inclusive Access' program integrates the cost of digital course textbooks into students' tuition and fees. It typically begins with agreements between institutions, bookstores, and publishers, delivering digital content to students via a learning management system. This approach allows students a limited period to "opt out" before being automatically billed for the content – a burden on students that can be challenging, particularly when the time limits are short.<sup>1</sup>

'Equitable Access' is a newer form of the sales model described above. In this model, all students are charged a flat fee for e-textbooks for every course credit they take, regardless of whether a specific course requires a textbook. The advantage cited for this model is that it streamlines student billing. However, these flat fees are charged per course even if there is no textbook assigned resulting in a considerable expense for full time students taking five courses. In some cases, students pay for materials they do not need. For example, upper year students would pay even if their courses do not have textbook requirements; similarly, students in disciplines that do not rely on textbooks would still be charged the fee.

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<sup>1</sup> In the U.S the opt-out model of automatic textbook billing has been challenged by the U.S. Department of Education, who are asking that students explicitly consent to enrolment in automatic textbook billing programs - they "opt-in." SEE: Knott, K. (2024 March 7). Colleges, Education Department at Odds Over Inclusive Access Changes. *Inside Higher Education*.  
[www.insidehighered.com/news/government/student-aid-policy/2024/03/07/colleges-education-department-odds-over-inclusive](http://www.insidehighered.com/news/government/student-aid-policy/2024/03/07/colleges-education-department-odds-over-inclusive)

## Drawbacks of Automatic Textbook Billing Models

While such models can offer students discounts for digital textbooks compared to print textbooks, they restrict student freedom to explore alternative, cost-effective options such as used, rented, or shared textbooks.<sup>2</sup> Both 'inclusive access' and 'equitable access' models are temporary rental models: access to the content disappears once the course is completed. Moreover, the models can create barriers for students who prefer print materials over e-textbooks, as students are charged for access to digital content they may not wish to use.

## Concerns About Equity and Data Privacy

Automatic textbook billing models raise concern about equity, as low income and first generation students may be particularly affected by textbook costs and choose to opt out of purchasing textbooks.<sup>3</sup> Financial challenges facing all students have increasingly become an issue in recent years, and with the use of campus food banks rising across the country, automatic textbook billing can exacerbate already existing affordability issues.<sup>4</sup>

Another issue raised by automatic textbook billing models is the tracking and gathering of student data by third party vendors. This raises questions about the protection of student privacy and any future use of the data, as well as concerns about data breaches.<sup>5</sup> With modern click through agreements governed outside of institutions of learning, students have little opportunity to refuse terms of use, including any terms governing the collection of personal data; moreover, students often have little understanding of publisher data collection policies.<sup>6</sup> Careful review and investigation of these programs is necessary in order to ensure compliance with institutional values and policies in these areas and with any applicable legislation.

## Impact on Faculty Flexibility and Academic Freedom

Both 'Inclusive Access' and 'Equitable Access' models reduce instructors' flexibility and course material choices. They limit faculty to course materials produced by select,

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<sup>2</sup> A Canadian student filed a class action lawsuit that argued that Inclusive Access programs were essentially non-competitive. See: Kyle Harman Singh Dhamrait v. McGraw-Hill Global Education Holdings, LLC, Pearson Education, Inc., Cengage Learning, Inc., McGraw-Hill Ryerson Limited, Pearson Canada Inc., and Cengage Learning Canada, Inc.(2020) SCBC.  
<https://cbaapps.org/ClassAction/PDF.aspx?id=12292>

<sup>3</sup> Jenkins, J. J., Sánchez, L. A., Schraedley, M. A., Hannans, J., Navick, N., & Young, J. (2020). Textbook broke: Textbook affordability as a social justice issue. *Journal of Interactive Media in Education*, 1(3), 1.

<sup>4</sup> Rukhsar Ali. (2023 August 15). Alberta campus food banks see doubled demand from students. CBC News.

<https://www.cbc.ca/news/canada/calgary/alberta-student-demand-for-campus-food-campus-1.6934038>

<sup>5</sup> InclusiveAccess.org. (n.d). Deal or Data Grab? Inclusive Access content can capture vast amounts of data on students and faculty. <https://www.inclusiveaccess.org/facts/deal-or-data-grab>

<sup>6</sup> Nagle, C., & Vitez, K. (2020). Fixing the broken textbook market. 2nd Edition. US Public Interest Research Group, Student PIRG. p. 3.

<https://pirg.org/resources/fixing-the-broken-textbook-market-second-edition/>

predetermined publishers. This can prevent instructors from offering free or more affordable course resources, such as Open Educational Resources (OERs) or library licensed content, and, in some cases, more pedagogically appropriate materials. Such models may not support smaller publishers, the publications of which may be excluded from vendor packages. Instructors may find their academic freedom is compromised when they cannot select or adapt materials to fit their teaching styles and goals.

## Challenges in Representing Canadian Content

As well, Canadian content may be under-represented in works available in automatic textbook billing programs, especially for teaching materials that are not textbook-based. This could potentially marginalize access to Canadian content from small publishers whose works might include university and regional presses, and content published in Canada that is bilingual or multilingual, or written from diverse perspectives. Any reduction in the use of such crucial content on Canadian campuses would be pedagogically inappropriate and not supportive of the entire Canadian publishing ecosystem.

## Impact on Library Services

From a library perspective, automatic textbook billing models negatively impact service delivery. These models eliminate the benefits students derive from accessing course materials that are licensed by the library or that are provided under copyright exceptions or pay-for-use agreements. Library eReserve programs deliver student cost savings for course readings on campus and are established services that many academic libraries invest in to improve the discovery and use of teaching resources for their community.

## Conclusion

In summary, while automatic textbook billing models can offer some cost benefits and ready access to students who are assigned textbooks, they present significant drawbacks. The flat-fee approach of 'Equitable Access' further exacerbates the challenges 'Inclusive Access' models incur, intensifying concerns for students and instructors, and threatening the overarching positive principles of open and affordable education. The current trend towards flat-fee licensing, in particular, should raise alarms among institutions that have invested in and strive to provide cost-effective educational resources via OER and library electronic materials to support teaching. Additionally, the appropriation of terms like "inclusive access" and "equitable access" to disguise mandatory textbook purchasing models raises ethical concerns, potentially undermining and confusing the progress made in promoting equity, diversity, inclusion, and accessibility (EDIA) within academia in Canada.

We strongly encourage all stakeholders in higher education, including academic libraries, to thoroughly evaluate the influence of automatic textbook billing on the accessibility of

course materials for students, the narrowing of faculty choice, and the educational experience overall. This evaluation should be carried out in conjunction with a commitment to prioritize the responsible selection of course materials and by taking into account affordability, quality, flexibility and genuine inclusivity in their delivery.<sup>7</sup> In our view, this will justifiably lead institutions to resist the offers from publishers and other vendors seeking to establish automated textbook sales arrangements on their campuses.

*Adopted by the CARL Board - March 2024*

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<sup>7</sup> For more information about Inclusive Access and its myths and facts please visit [InclusiveAccess.org](https://www.inclusiveaccess.org), a project founded by the Scholarly Publishing and Academic Resources Coalition (SPARC) in conjunction with other partners.