Office of the President

TO MEMBERS OF THE BOARD OF REGENTS:

DISCUSSION ITEM

For Meeting of January 21, 2021

REPORT ON THE OUTCOME OF THE FEASIBILITY STUDY OF A NEW COLLEGE ENTRANCE EXAM IN UNIVERSITY OF CALIFORNIA UNDERGRADUATE ADMISSIONS

EXECUTIVE SUMMARY

This item provides an overview of the process and outcome of the feasibility study of a new college entrance exam in UC freshman undergraduate admissions. Following the approval of the UC Board of Regents to suspend standardized testing requirements and conduct a feasibility study to determine the possibility of having a test that meets UC requirements by 2025, this item highlights the process of the Feasibility Study Steering Committee and Feasibility Study Work Group in advancing a recommendation to President Drake. The steering committee recommended to the President that 1) a standardized testing requirement for admissions creates high stakes conditions that should be avoided; 2) it is not feasible to create or develop a new test by 2025; and 3) it is possible to leverage an existing test, under certain conditions, that meets many of UC’s requirements and that students might have the option of submitting for admissions consideration.

BACKGROUND

On May 21, 2020, the Regents voted unanimously to approve the suspension of the current standardized test (SAT/ACT) requirement for undergraduate admissions until 2024 to allow the University to explore whether it was possible to modify or create a new test that better aligns with the academic content UC expects applicants to have learned, or to eliminate the testing requirement altogether.

The action1 included provisions for a feasibility study, starting in summer 2020 and ending by January 2021, to assess the possibility of identifying or creating a new test that aligns with UC college preparation goals, with the aim of advancing equity in admissions, and educational attainment and achievement. President Emeritus Napolitano asked Provost and Executive Vice President Brown to lead the feasibility study and to deliver a recommendation to the UC President by January 2021.

OUTCOME

1 https://regents.universityofcalifornia.edu/regmeet/may20/b4.pdf
The Feasibility Study Steering Committee recommends the following course of action:

1. The University of California should not have a standardized testing requirement for freshman undergraduate admissions, starting with applicants for fall 2025.
   a. The creation of a new UC admissions test is not feasible, primarily due to the implementation timetable set by the Regents.
   b. The use of SAT/ACT was eliminated as a viable option per the May 2020 Regents’ Action Item.
   c. Requiring a standardized test in admissions leads to the test becoming “high stakes” like the SAT and ACT, leading to negative equity and educationally distorting impacts.

2. The inclusion of an additional optional data point, such as a test score, may be valuable for consideration in admissions.
   a. It may be feasible to modify an existing test for use in admissions as an additional data point, yet more information is needed to explore and evaluate the potential of using an existing test in admissions in a manner that is different from previous high stakes use of the SAT/ACT.

FEASIBILITY STUDY PROCESS

Structure of the process
Between June and August 2020, Provost and Executive Vice President Brown identified and selected key stakeholders and prominent experts to participate in the feasibility study. Between September and December 2020, he convened four meetings of a Feasibility Study Steering Committee (FSSC) comprised of stakeholders with a vested interest in the outcome of the feasibility study, including UC enrollment managers, and representatives of the California educational segments, the UC Academic Senate, and educational equity and test fairness organizations (see Attachment 1). The FSSC was charged with identifying the high-level purpose and goal of a UC freshman admissions test and developing a recommendation to the UC President to (1) pursue a new or modified standardized test for use in UC freshman admissions and selection or (2) eliminate standardized testing at UC beginning with fall 2025 admissions (see Attachment 2). The Feasibility Study Steering Committee met once a month between September and December.

A Feasibility Study Work Group (FSWG)—comprised of UC faculty, a UC student, K-12 leadership, psychometricians, UC admissions practitioners, a California State University representative, and a California Community Colleges Chancellor’s Office representative (see Attachment 3)—was charged with determining whether it is possible to develop a new or modified UC standardized admissions test that meets Regental criteria (see Attachment 4). The FSWG submitted its recommendation and supporting evidence to the FSSC to inform the Committee’s final recommendation to President Drake. The FSWG met ten times, once a week between September and December.

Throughout the deliberation process, the FSWG consulted a variety of resources to inform their discussions and decision-making. For instance, members reviewed research studies on
standardized testing and technical documents from existing assessments. Experts presented on their research and expertise related to specific standardized tests. These resources were instrumental in guiding discussions and providing information that members needed to determine feasibility.

Feasibility study criteria
In their May 2020 action, the Regents specified criteria to guide the feasibility study: “...the Regents approve a suspension of the current standardized test (SAT/ACT) requirement for undergraduate admissions until 2024 to allow the University to modify or create a new test that better aligns with the content UC expects applicants to have learned and with UC’s values.” Furthermore, “if UC is unable to either modify or create a test that meets these criteria and can be available for applicants for fall 2025, UC will eliminate altogether the use of the SAT/ACT for freshman admissions.”

The FSWG defined “feasibility” as (1) alignment with the UC Principles for Admissions Testing, as established by the Board of Admissions and Relations with Schools (BOARS), and (2) the availability of a test for fall 2025 applicants. The BOARS testing principles (2009) articulate the desired features of an admissions test that reflects “the content UC expects applicants to have learned and with UC’s values.” The four principles served as the primary criteria against which testing options were weighed.

1. An admissions test should be a reliable measurement that provides uniform assessment and should be fair across demographic groups.
2. An admissions test should measure levels of mastery of content in UC-approved high school preparatory coursework and should provide information to students, parents, and educators enabling them to identify academic strengths and weaknesses.
3. An admissions test should be demonstrably useful in predicting student success at UC and provide information beyond what is contained in other parts of the application.
4. An admissions test should be useful in a way that justifies its social and monetary costs.

Test options considered
Throughout the work group’s deliberations, there were three key issues that resurfaced during feasibility discussions: a) equity, b) the use of a new or modified test in admissions, and c) incremental utility of an admissions test. Throughout the process, the FSWG focused on equity and ensuring that it was prioritized in every discussion. There were many in-depth conversations around the appropriate use of an undergraduate admissions test at UC, specifically considering at what point in the process an admissions test should be used: minimum eligibility, admissions guarantee (e.g., statewide index), or applicant selection. Finally, the notion of incremental utility emerged consistently as members weighed the added value of a new or modified admissions test above and beyond GPA in all completed A-G courses, and other factors currently used in admissions decisions. These three issues drove much of the ensuing conversations as key

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2 [https://senate.universityofcalifornia.edu/files/reports/hp2mgy_boars-testing_010609.pdf](https://senate.universityofcalifornia.edu/files/reports/hp2mgy_boars-testing_010609.pdf)
considerations in the decision-making.

Given the quick timeline and mandate, the group narrowed the focus of the feasibility study to three test options:

1. New UC-developed admissions test
2. No admissions test
3. An existing test in its current form or with modifications

**New UC-developed admissions test**
The work group eliminated the option of a new UC-developed test early in the discussions. The most compelling reason for removing this option was time. The Regents’ action specified that a new test must be made available to fall 2025 applicants, necessitating implementation by spring 2024. The Standardized Testing Task Force (STTF)\(^3\) estimated that it would take at least nine years to develop a new UC assessment for admissions. As such, the FSWG concluded that it would not be possible to develop a rigorous, large-scale admissions test that meets the BOARS testing principles (2009) and follows the recommendations of the STTF by spring 2024.

**No admissions test**
The FSWG identified several benefits in having information available from a standardized test at UC. The promise of aligning K-12 with UC through a standardized test that could serve a more comprehensive process in the admission and support of high school students to UC, assess college and career readiness in K-12, and create the conditions for better educational preparation in California high schools was compelling.

A minority of FSWG members expressed concerns that without a test, qualified students who test well, yet have lower GPAs, would not have the opportunity to showcase their abilities. For example, in 2019, of the 21,034 underrepresented minority (URM) students who applied to UC that were UC eligible, 5,562 URM students—or 26 percent—were eligible by the statewide eligibility index only; noteworthy, of the 2,528 African American students in this group who applied to UC, 1,024—or 40 percent—were eligible by the statewide eligibility index only. Additionally, in the absence of a test, admissions professionals could become over-reliant on GPA as one of the only academic indicators in comprehensive review. Some FSWG members worried that over-reliance on GPA could exacerbate grade inflation within K-12 schools. Further, since grades and GPA vary from school to school, they do not provide a standardized measurement across students of college readiness in the absence of a test. Some members of the FSWG saw value in having an additional quantitative data point in admissions and believed that opting not to pursue a test might be a missed opportunity.

**An existing test in its current form or with modifications**
The work group revisited the use of the SAT/ACT as standardized tests in admissions, but eliminated them as viable options. The recommendation in the Regents’ Action Item specifically phased out the SAT/ACT, and indicated that if a new test is not feasible by 2025, “consideration of the SAT/ACT would still be eliminated for California students.”

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\(^3\) [https://senate.universityofcalifornia.edu/ files/committees/sttf/sttf-report.pdf](https://senate.universityofcalifornia.edu/ files/committees/sttf/sttf-report.pdf)
Throughout their discussions, FSWG members valued the input they learned from admissions leaders and practitioners, who indicated that an additional data point in the admissions process could be valuable. This consideration led the group to be comprehensive in their process and while they understood the selection of any particular test was beyond its scope, the group could not consider feasibility and potential equity impacts without a deep discussion of its ultimate use. Therefore, to be able to adequately address feasibility and potential value in admissions, members focused on the Smarter Balanced 11th grade summative assessment as a case study to examine the feasibility of modifying an existing test. Smarter Balanced (SB) is aligned with state curriculum standards and A-G requirements, and is already administered free of charge to all 11th graders attending California public schools.

Among some of the benefits and costs FSWG considered with modifying SB for use in UC admissions were the following:

**Benefits**
- SB might help achieve a dual purpose: admissions support and high quality K-12 educational preparation.
- Research findings indicate that SB offers roughly the same predictive power as high school GPA and SAT.\(^4\)
- SB is aligned to the California state content standards being taught in California’s public K-12 schools.
- Given that public school students are already taking SB as part of California’s education accountability program, there would be no additional financial costs to students and families.
- SB will provide another data point, that is standardized across applicants, for UC campuses to use in their respective comprehensive review processes, which may provide students with an additional opportunity to demonstrate college readiness.

**Costs**
- The original purpose of SB was to provide aggregate-level data for local education agency (LEAs; such as schools and districts) accountability and improvement purposes at the school level, not individual student achievement. Because SB was not designed as an admissions test, its use for this purpose is potentially misaligned.
- Modifying the assessment to meet admissions purposes would require a heavy administrative burden that would involve multiple stakeholders and education entities, would be expensive to develop and administer, and require significant time to develop, pilot, and field test.
- If SB became a high-stakes test, it may lead to a new market of private, for-profit test preparation that could further exacerbate inequity in terms of who has access to these

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additional resources. This is a similar argument made in opposition to the use of the SAT/ACT.

- Not all students have access to SB, including international students and most out-of-state students. Private school and homeschool students in California are prohibited by law from taking SB. If SB were to be adopted as a test for admission to UC, test requirements would differ for different applicants, i.e., those from California public schools, out-of-state and international schools, and California private schools.
- With UC proceeding test-free for the next few years, returning to an admissions test in 2025 could lead to additional public confusion and lack of clarity on UC admissions requirements.

Ultimately, considering the costs and benefits, the FSWG determined that it was feasible to explore modification of an existing test, specifically SB (see Attachment 5). The opportunity to further align K-12 instruction and UC preparation was compelling, and the Smarter Balanced Assessment Consortium (SBAC) expressed willingness to partner with UC to further strengthen the test to achieve greater equity. After the formal FSWG process, a slight majority of work group members submitted a memorandum expressing their opposition to the use of SB in applicant selection, expressing the opinion that the context generated greater concerns about the negative effects of high stakes testing than other possible uses (see Attachment 6).

Feasibility Study Steering Committee
Based on the recommendation of the work group, the steering committee concluded that the creation of a new UC test to take the place of SAT/ACT in UC admissions was not feasible (see Attachment 7). Members of the steering committee engaged in a deep discussion over the potential of an already existing test to add an additional data point to the sources of information used for admissions purposes. Thus, the steering committee proposed further exploration of an existing test to be considered for use in admissions, but in a manner that is different from the previous high stakes use of the SAT/ACT. Members of the steering committee believed that the inclusion of an optional test score may provide an additional data point that is demonstrative of student potential. Using the recommendation from the work group, the steering committee elected to consider the Smarter Balanced (SB) assessment as a possible tool to further explore in a discovery phase.

To lessen the stakes of SB in admissions, the steering committee recommended several issues be considered:

- *Allowing*, instead of *requiring*, students to submit their SB scores as one data point in the comprehensive review process
- Using the SB score as one of many data points in holistic assessment, rather than as a fixed or heavily-weighted element of admissions formulas
- Exploring whether multiple testing opportunities would help prevent a single test administered on a single day from becoming a high stakes situation.

**OUTCOME OF FEASIBILITY STUDY**

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In December 2020, the Feasibility Study Work Group (FSWG) determined that it was not feasible to develop a new test for UC freshman admissions by 2025 and delivered this recommendation to the Feasibility Study Steering Committee (FSSC). The FSSC agreed with this conclusion and further determined that it is neither feasible nor desirable to create or develop a new test to take the place of the SAT or ACT in UC admissions.

The FSWG also suggested that it might be valuable to explore the possibility of including an optional data point for consideration in comprehensive review. They recommended exploring the potential of the Smarter Balanced 11th grade summative assessment in UC admissions. However, the FSWG sought specific conditions related to maintaining and increasing equity:

- UC partners with Smarter Balanced Assessment Consortium (SBAC) and the California Department of Education to secure access to item-level data to conduct independent analyses to determine if there are any biases or disparities in the individual questions.
- UC implements bias-reduction and disparity-reduction procedures, such as the “Golden Rule,”6 at the item level if significant bias is detected.
- UC continues to monitor, in an ongoing fashion, the effect of SB on equity and admissions outcomes if it is used in admissions and becomes a high stakes test.

As part of its recommendation, the FSWG indicated that if the conditions were not met, then UC should not pursue the possibility of SB further. Instead, UC would eliminate the testing requirement for freshman admissions altogether and adopt the third option—no admissions test—in the Regents’ charge.

In agreement with the FSWG’s recommendation to explore and evaluate the potential of an existing test, the FSSC proposed that it is potentially feasible to invite the inclusion of a test score as an additional data point for admissions purposes, but with important steps taken to keep the stakes associated with the test low. Specifically, they proposed the Smarter Balanced (SB) assessment be further studied and evaluated to determine if it meets the FSWG conditions, and that it be considered for use in a manner that is different from the previous high stakes use of the SAT or ACT.

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**Key to Acronyms**

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<th>Acronym</th>
<th>Description</th>
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<tr>
<td>ACT</td>
<td>American College Testing</td>
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<td>BOARS</td>
<td>Board of Admissions and Relations with Schools</td>
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<td>FSWG</td>
<td>Feasibility Study Work Group</td>
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<td>FSSC</td>
<td>Feasibility Study Steering Committee</td>
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<tr>
<td>GPA</td>
<td>Grade Point Average</td>
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<tr>
<td>LEA</td>
<td>Local Education Agency, such as schools and school districts</td>
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<tr>
<td>SAT</td>
<td>Formerly Scholastic Aptitude Test; Scholastic Assessment Test</td>
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Attachment 1: Feasibility Study Steering Committee (FSSC) Roster
Attachment 2: Feasibility Study Steering Committee (FSSC) Charge
Attachment 3: Feasibility Study Work Group (FSWG) Roster
Attachment 4: Feasibility Study Work Group (FSWG) Charge
Attachment 5: Feasibility Study Work Group (FSWG) Report
Attachment 6: Auxiliary Report Against Use of Smarter Balanced
Attachment 7: Feasibility Study Steering Committee (FSSC) Recommendation