

MEMORANDUM

TO: Provost and Executive Vice President Brown
Academic Senate Chair Gauvain
FROM: BOARS Chair Comeaux
Academic Senate Vice Chair Horwitz
DATE: December 4, 2020
SUBJECT: Feasibility of a new UC admissions test

Dear Provost Brown and Chair Gauvain,

On behalf of the Feasibility Study Work Group (FSWG), we respectfully submit a recommendation to the Feasibility Study Steering Committee (FSSC) on the viability of a new UC test for use in freshman admissions in accordance with the Regents' May 21, 2020 action.

The FSWG was charged with determining “whether it is possible to develop a new UC standardized admissions test for use in freshman admission and selection that aligns with the content that UC expects students should have mastered and that can be implemented within the allotted timeframe [i.e., spring 2024].” The Work Group was asked to “submit a recommendation and supporting evidence to the Feasibility Study Steering Committee to inform the Committee’s recommendation to the UC President to (1) pursue a new standardized test for use in UC freshman admissions and selection or (2) eliminate standardized testing as a requirement at UC beginning with fall 2025 admission.”

It bears noting that the context in which the FSWG carried out this charge included new pandemic-related developments in the educational testing world. A legal injunction required all UC campuses to immediately transition to test-free admissions for fall 2021 applicants. The State Board of Education approved a short form of the Smarter Balanced (SB) assessment for California’s public school students to be administered in spring 2021. These examples made the FSWG mindful of the potential short- and long-term consequences of the pandemic on students, particularly those with limited educational and personal resources. That said, equity concerns were central to our discussions.

After nearly three months of deliberation, **the FSWG concluded that it is feasible to modify an existing test for use in UC freshman admissions** under the parameters specified by the Regents, President Emeritus Napolitano and Provost Brown. **The FSWG recommends that UC pursue the modification of an existing assessment — with conditions, to ensure fairness and equity.**

Specifically, the FSWG recommends further exploration of the Smarter Balanced (SB) assessment for admissions purposes. Though it is outside the scope of the workgroup, it is important to note that about half of the members were opposed to using SB for admissions *selection*. The FSWG envisions that this exploration would bring together representatives from the different educational segments in California as well as members of the Smarter Balanced

Assessment Consortium (SBAC) to examine the test to determine whether the instrument and outcomes are fair and equitable for all students. To achieve this, the FSWG includes three conditions to this exploration, which include (1) analysis of item-level data to identify bias and disparity, (2) implementation of bias-reduction and disparity-reduction procedures, including but not limited to the “Golden Rule” procedure, if the item-level analysis reveals significant bias and disparity (3) continued monitoring of the effect of SB on equity and admissions outcomes if it is used in admissions and becomes a high-stakes test. Care should be taken so that a disconnect with curriculum standards does not result. As part of its recommendation, if the conditions are not met, then UC should not further pursue the possibility of SB for use in admissions and the recommendation would be that UC not have a standardized test for undergraduate admissions.

The following report describes the FSWG’s process, testing options considered and rationale for selection or non-selection of options, and it elaborates on the FSWG recommendation. Additionally, the report touches briefly upon issues for further exploration and inquiry that the Work Group was unable to delve into due to the specific charge, time constraints of the study, and the timing (spring 2024) for the implementation of any new test.

In closing, the FSWG co-chairs would like to recognize the contributions of the Work Group members, who devoted their invaluable expertise and countless precious hours to this effort. They actively approached the process with a deep sense of responsibility, creativity and open minds. The co-chairs also express deep gratitude to the FSWG staff. On behalf of the FSWG, we would also like to express our appreciation to you for serving as a resource and for the opportunity to contribute to this important decision-making process for UC admissions that could have an impact on educational equity in California for years to come.

Respectfully,



Eddie Comeaux



Robert Horwitz

Report of the Feasibility Study Work Group: Feasibility of a New UC Admissions Test

FSWG process

The 18-person Feasibility Study Work Group (FSWG) met weekly for a total of 10 meetings between September and December. Underlying the FSWG’s deliberations were criteria set by the Regents, President Emeritus Napolitano and Provost Brown. For the purpose of the study, the FSWG defined “feasibility” as meeting — or, with modification, the potential to meet — these criteria.

Feasibility Study Criteria

Fair and equitable

“Reliable measurement that provides uniform assessment and should be fair across demographic groups” (*UC Principles for Admissions Testing*)

Aligns with UC college preparation goals; Provides feedback to students, families and schools

“Measures 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” (*UC Principles for Admissions Testing*)

Predictive of student success; Source of information not available elsewhere

“Demonstrably useful in predicting student success at UC and [should] provide information beyond that which is contained in other parts of the application” (*UC Principles for Admissions Testing*)

Benefits outweigh the costs

“Useful in a way that justifies its social and monetary costs” (*UC Principles for Admissions Testing*)

Available for fall 2025 applicants

“The new test will be implemented on an accelerated timeline so that it is in place for fall 2025 applicants.” (*Regents’ action*)

The FSWG consulted a variety of scholarly resources to inform its discussions and decision-making. Members reviewed research studies on standardized testing and technical documents from existing assessments. Work Group member experts gave presentations on their research and expertise related to specific standardized tests. The Work Group also solicited additional information from the FSSC (e.g., College Board Landscape materials) and the Smarter Balanced Assessment Consortium (SBAC; e.g., preliminary cost estimates). These resources were instrumental in guiding discussions and providing information that members needed to determine feasibility.

Testing options under consideration

Given the tight timeline, the group quickly 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

1. New UC-developed admissions test

The Work Group eliminated the option of a new UC-developed test early on. 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 \(STTF\)](#) 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.

2. 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. 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.

3. 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."

While the FSWG understood that the selection of any particular test was beyond its scope, members determined that the use of the Smarter Balanced 11th-grade summative assessment was the most logical option for an already existing test for modification. 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. As such, the Work Group used SB as a case study to examine the feasibility of modifying an existing test.

SB is designed to measure cumulative knowledge and proficiency in math and English Language Arts. Outcomes from the SB test have revealed large and persistent racial and ethnic disparities in scores, which are usually said to reflect inequities in K–12 schooling: under-resourced schools in underrepresented communities which afford students relatively little access to high-quality curriculum and teaching. The FSWG acknowledged these realities of the test and sought to explore potential ways to mitigate these disparities.

One proposal to address the disparities problem within the framework of a test was to develop a set of standardized performance tasks that would simulate what college demands: grasping and using new information in academic subjects. The FSWG as a whole did not have an opportunity to explore this proposal further with SBAC representatives. However, the SBAC representatives did make it clear that modifications to performance tasks would be prohibitive to deliver for the fall 2025 cohort. With this constraint, one-third of FSWG members voted against recommending use of a modified SB in the UC admission process. Their vote against further exploring SB was in part due to the elimination of modifying performance tasks, without which it was unclear how much of the intergroup disparities would be minimized.

The FSWG considered a range of benefits and costs associated with modifying SB for use in UC admissions:

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.¹
- SB is aligned to the California state content standards being taught in California’s public K–12 schools.
- Since 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 is administered during the school day, thus eliminating the need for students and families to set additional time aside during non-school hours to take the test.
- SB may provide additional information beyond GPA as a demonstration of academic content mastery, thus adding incremental value to the admissions process. The SB test would thus constitute one additional data point to be considered as part of the 14 criteria used in the holistic admissions process.
- SB is a criterion-referenced test, which measures students’ mastery of curricula content.
- SB is highly accessible with multiple levels of support to ensure that all students can take the test, including students who are English learners and students with disabilities.

¹ Kurlaender, M., & Cohen, K. (2019, March). Predicting college success: How do different high school assessments measure up? Retrieved from the Policy Analysis for California Education (PACE) website at <https://edpolicyinca.org/publications/predicting-college-success-how-do-different-high-school-assessments-measure-2019>

- SB is computer adaptive, which means that as students respond to questions, the test adjusts the next set of questions based on students' correct/incorrect answers.
- 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.
- There are clear educational inequities — e.g., resources, quality of teaching — across schools. Adequate funding and attention to ongoing forms of oppression in vulnerable communities will be required.
- SB scores in grade 11 show persistent disparities between students in different racial or ethnic categories, often presumed to reflect inequities in K–12 schooling. For instance, in mathematics, about 70 percent of students classified as Asian meet or exceed the standard, but only about 20 percent of students classified as Black or Latinx. Around 45 percent of students classified as White meet the math standard.
- Augmenting or modifying the assessment to meet admissions purposes would require a heavy administrative burden that would involve multiple stakeholders and education entities.
- Augmentations or modifications would be expensive to develop and administer, potentially increasing the time needed for schools to administer and students to complete the assessment. Currently, the length of the 11th-grade summative assessment is 7.5 hours.
- Augmentations or modifications would require significant time to develop, pilot and field test.
- If SB is used in UC admissions, it could become a high-stakes test, thus leading to the same stresses and anxiety that students experienced under the previous test regime.
- Shifting SB to a high-stakes test 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 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 students in California are prohibited by law from taking SB.² 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.
- Since only public school students in California have access to SB, the incremental utility in having a standardized test across all applicants is diminished.
- It is unclear if SB is more equitable than previous admissions tests (SAT/ACT). Additional item-level analyses of possible disparities due to bias across race/ethnicity and gender are advised.
- Students can only take SB 11th-grade summative assessment once, thus foreclosing any opportunity to retake the test and improve scores, making it more high-stakes than the SAT/ACT, which students can retake.

² California Assessment of Student Performance and Progress (CAASPP). <https://www.caaspp.org/faqs/all-faqs.html>

- 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 majority of the FSWG determined that it was feasible to explore modification of an existing test, specifically SB. The opportunity to further align K–12 instruction and UC preparation was compelling, and SBAC expressed willingness to partner with UC to further strengthen the test to achieve greater equity. Finally, since California public school students already take the test, it would neither require an additional test for admissions purposes nor cost students more money.

Use of an admissions test

While use of an admissions test exists under the ultimate purview of BOARS, the FSWG was asked to consider what might be the appropriate use of a new or modified test in admissions. It bears noting that, while the majority of the FSWG determined that it was *feasible* to modify an existing test, there was concern about the potential application of the test exacerbating inequities in the admissions process. As such, the use of a test in UC admissions was a topic that the group returned to time and again. The conversation often included low- versus high-stakes testing in an attempt to better define what is low-stakes, what is high-stakes, how to differentiate the two, and how an admissions test fits into this spectrum. With UC admissions, there are three ways a test could be used, which have varying levels of low- or high-stakes:

- a) Taking a test (regardless of score) to be minimally *eligible* to apply (i.e., meet requirements to apply)
- b) Taking a test, earning a score (combined with one’s high school GPA) to rank within the top nine percent of California students according to the admissions index, and subsequently earning *guaranteed* admission to UC (a.k.a. statewide guarantee)
- c) Taking a test and earning a score to be *competitive* for admission to a particular campus (i.e., selection)

The FSWG identified many different uses for an admissions test, according to the UC admissions process. Using the SB assessment as an example, the various uses, rationales and concerns are outlined below.

Minimum eligibility

- Simply taking SB would qualify students to meet minimum eligibility. SAT/ACT-taking were previously used in this manner.
 - One concern is that test-taking, in and of itself, does not provide any data about college readiness.
- SB scores as a threshold for meeting minimum eligibility
 - This would provide students and families with clearly articulated admissions requirements.
 - One concern is that this is more stringent than the previous admissions test for minimum eligibility, thus potentially creating additional barriers for students.

Statewide guarantee

- Students would receive an index score based on SB scores and GPA, qualifying students for a statewide guarantee of admissions.

- Statewide guarantee facilitates greater incentive for students to take the test seriously.
- One concern is that linking the guarantee to the test elevates it to a high-stakes test.

Selection

- SB scores as one factor in the comprehensive review process. However, a majority of the FSWG concluded that this use was not feasible under the charge of the work group.
 - This could be used as an additional academic data point in admissions and could be used to validate the GPA.
 - Aggregate SB averages at the school level could provide context and environmental data related to factors that enhance or impinge on student opportunities.
 - One concern is that using SB for admissions selection, a purpose for which it was not originally designed, may decrease its usefulness as a data point.
 - Another concern is the use of SB in selection shifts it to high-stakes.

Other potential uses

- SB scores as one of multiple measures for course placement
 - This would keep the test low-stakes but would be useful to UC, therefore supporting K–12 and UC alignment.
 - One concern was that SB was validated as an assessment instrument for a specific purpose, thus using SB for a different purpose needs to be thoroughly evaluated.
 - Another concern was that students enroll in classes on their own without guidance, thus rendering the placement obsolete.
- SB scores as a way to identify students for opportunities and additional programming, such as Summer Bridge
 - This would keep the test low-stakes but would help identify students who might benefit from additional opportunities.
- SB scores to identify the types of supports students might need from UC to be academically successful
 - This would keep the test low-stakes but would support students and their success at UC.
- SB scores to provide career and occupational advice, including high school course planning
 - This would support students' trajectory through and beyond UC and benefit students' future planning.

The group discussed the use of a test at length and in depth, yet there was disagreement on the appropriate utilization of a standardized test in admissions. In fact, while supportive of exploring SB for use in admissions, about half of the Work Group members were steadfast in their opposition to its use as a tool for selection.

Questions to inform future action

While the FSWG identified SB as the most logical assessment for modification because of the promise of the dual purpose of admissions support and high-quality K–12 educational preparation, there is much that is still unknown. To guide the continued exploration into using SB for UC admissions, several questions and lines of inquiry should be pursued further:

- Since SB was not developed for admissions purposes, there presently exist no data on predictive validity in the context of admissions for college student success, thus additional research would be needed over time.
- The extent to which, if at all, the assessment is biased among different racial/ethnic and socioeconomic groups overall and at the item level is also unclear and warrants further investigation.
- UC admissions is test free until fall 2025, and the implications of the loss of this factor for consideration in admissions and in ultimate UC undergraduate student outcomes are unclear and should be examined as well.

These questions are not exhaustive, and additional thought should be given to other important issues that would inform future exploration of SB as an admissions tool.

Issues for further consideration and inquiry

During the discussions, innovative ideas and suggestions arose that merit further consideration as UC weighs the evidence for or against the use of a standardized test for undergraduate admissions. The limited scope and timeframe of the Feasibility Study prevented further investigation into these possibilities, but the opportunities are worth mentioning for future consideration.

The FSWG expressed interest in developing measures that capture important student characteristics beyond what is already examined in the admissions criteria. These characteristics have important relationships with educational success and life outcomes. For instance, there was interest in measuring psychosocial factors such as intellectual curiosity, resilience and independence. Additionally, members were interested in improved admissions tools as well, such as revised letters of recommendation, situational judgment assessments, better measures of student accomplishments and structured interviews. These types of measures have the potential to lower disparate impact across groups while also serving to help admissions officers understand the whole student.

The FSWG also explored the creation of computer-adaptive performance tasks on the SB assessment that measure students' proficiency in grasping and using new information, given the students' level of prior knowledge. It is possible that these redesigned performance tasks might reduce intergroup disparities in scores, while simulating what college students must do: grasp and use new information in academic domains.

Finally, working with SBAC, the CDE and the State Board of Education (SBE) provides UC with an opportunity not only to align K–12 and UC curriculum with admissions, but also to create information and data pathways where UC could have access to valuable information on California public school students. This type of information could be used to better serve K–12 students and facilitate smoother pathways to and through UC.

Recommendation

After determining that modifying an existing test was feasible, the FSWG developed a recommendation that incorporates the knowledge and information gained from this process and

group discussions. Since the group examined SB as an example of an already existing test, one logical next step is to move forward in considering this assessment for UC admissions.

The recommendation is for UC to move forward to explore the use of SB in admissions, with specific conditions related to maintaining and increasing equity:

- UC partners with SBAC and the California Department of Education to secure access to item-level data in order 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,” at the item level if significant bias or disparities are detected.³
- UC continues to monitor 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.

³ Golden Rule Life Ins. Co. v. Washburn, No. 419-76 (Cir. Ct. Sangamon County, Ill., settled Nov. 20, 1984); Weiss, J. (1987). The Golden Rule bias reduction principle: A practical reform. *Educational Measurement: Issues and Practice*, 6(2), 23–25. <https://doi.org/10.1111/j.1745-3992.1987.tb00408.x>