

UC Regents Should Consider All Evidence and Options in Decision on Admissions Policy

Table of Contents

Overview	2
by Michal Kurlaender, Sarah Reber, and Jesse Rothstein	
Comments on the Standardized Testing Task Force Recommendation to Not Consider the Smarter Balanced Assessments in University of California Admissions.....	5
by Michal Kurlaender	
Comments on the Standardized Testing Task Force Recommendations to Review and Update Components of the Statewide Eligibility Index and Expand Eligibility in the Local Context	10
by Sarah Reber	
Comments on the Standardized Testing Task Force Report’s Treatment of Predictive Validity and the Use of SATs in Current University of California Admissions	20
by Jesse Rothstein	
Author Biographies	28

Overview

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As the University of California (UC) Board of Regents approaches an important decision on the use of the SAT and ACT in UC admissions, a faculty task force report¹ that was meant to inform and clarify has instead mischaracterized key issues. The report makes recommendations that are neither rooted in evidence nor likely to improve admissions fairness or representation across campuses. The report acknowledges many problems with the SAT/ACT's use in admissions, but its recommendation that the UC continue to use these tests while taking a decade to develop a replacement would waste both time and taxpayer dollars.

In the three detailed analyses that follow, we seek to provide a more comprehensive understanding of previous research and the options at hand. Our goal is to support a better informed decision that will have major consequences for public higher education and the students who aspire to it.

¹ The *Report of the Academic Council's Standardized Testing Task Force (STTF)*, published January 2020, can be found here: https://senate.universityofcalifornia.edu/_files/underreview/sttf-report.pdf. Page references to the report in the present document appear in the main text following the relevant quotation.

As faculty who have studied these issues for years, we ask the Regents to carefully consider the research and to examine all reasonable options for bringing greater fairness to the process by which students seek admission to the UC. This would be a service not just to those young people but also to the K–12 schools that are the UC’s primary pipeline.

In the three separate analyses appearing below, we urge the Regents to consider the following:

Admissions policies that put substantial weight on SAT scores create barriers to admission for students from underrepresented groups and lead to less diversity. A fair admissions system would not place as much emphasis on SAT scores—which are proxies for opportunity—as the UC does now. UC campuses could put greater emphasis on high school grades without creating grade inflation that would undermine the fairness or validity of admissions decisions.

Expanding the number of students who meet the Eligibility in the Local Context (ELC) cutoff will do little to change admissions outcomes or increase diversity. Students who are in the top 9 percent (by GPA) of their high school class qualify for the ELC program and are “guaranteed” admission to “a UC campus that has space.” In practice, this guarantee only applies to UC Merced and few students enroll in the UC by this path. A more effective ELC policy would require every UC campus to guarantee admission to some percentage of top students from every California high school.

Too quick dismissal of Smarter Balanced (SBAC) assessments in UC admissions ignores their potential. The SBAC is a professionally developed set of tests administered to all public high school students that is designed to measure how well they have mastered state academic standards. Using the SBAC for admissions would send an important signal: The best way to prepare for college is to master what is taught in the state’s K–12 schools. The task force identified several practical issues that would need to be addressed for the UC to use the SBAC in admissions, in addition to or instead of the SAT/ACT; these could be resolved through a productive collaboration with K–12.

The suggestion that the UC spend close to a decade developing a new test is wasteful and misguided. The UC has the chance now to form a partnership with K–12 on admissions and academic expectations that would strengthen both systems and provide a service to students who aspire to attend the state’s 4-year colleges. Greater reliance on other validated measures of college readiness—such as GPA and the SBAC—could improve equity while simultaneously aligning the now-disjointed expectations of high schools and universities.

Our goal in putting forward these analyses is to support an evidence-based and responsible decision. Unfortunately, the task force report has muddied more than it has clarified and is too hasty in dismissing options that should remain on the table. As the Regents weigh the options before them, we strongly encourage them to consider perspectives beyond the task force report, including those we provide here.

Comments on the Standardized Testing Task Force Recommendation to Not Consider the Smarter Balanced Assessments in University of California Admissions

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The Academic Council’s Standardized Testing Task Force (STTF) considered but did not recommend adopting Smarter Balanced Assessment Consortium (SBAC) assessments in lieu of currently used standardized tests in University of California (UC) admissions decisions. This recommendation—along with the suggestion that the UC develop an alternative test that would be 9 years in the making—is misguided for many reasons, as I outline below. Moreover, the STTF ignores or misconstrues recent research on the utility of the SBAC for predicting college success. Development of an alternative test would unnecessarily duplicate the efforts of the state to develop a valid and reliable system of assessments and might harm efforts to improve alignment with K–12.

Purposes of the Smarter Balanced Assessments

Implemented in California in 2014–15, the SBAC is designed to evaluate students’ college and career readiness. The STTF report states: “A test designed and optimized for one purpose is not automatically appropriate for another” (p. 90). While this is certainly true, why would we not consider an assessment purposefully developed to align the expectations of K–12 and higher education? Many other states now use the same standardized tests for both K–12 accountability and admissions, which has resulted in increases in college participation.² This approach reduces testing burdens on students and teachers and ensures student motivation to show what they know because the results on

² Dynarski, S. M. (2018, February 8). *ACT/SAT for all: A cheap, effective way to narrow income gaps in college* [Report]. Brookings Institution. <https://www.brookings.edu/research/act-sat-for-all-a-cheap-effective-way-to-narrow-income-gaps-in-college/>

such assessments have consequences for them. **The UC should seriously consider using the SBAC for admissions.**

The STTF suggests that test providers document validity evidence that supports the purposes for test use, which is precisely what we do in the cited study “Predicting College Success: How Do Different High School Assessments Measure Up?”³ In fact, we find that **the SBAC does as well as existing entrance exams in predicting academic readiness and college persistence.**

Addressing a Few of the Standardized Testing Task Force’s Specific Claims

Equity claim

It is certainly possible that if the SBAC were to become an assessment with high stakes for students and teachers, teaching and test-taking behavior could change, along with predictive validity. However, it is unlikely that predictive validity would decrease. It is more likely to increase due to greater student and teacher motivation. The STTF claims that the current federally mandated purpose for which SBAC tests were developed would be gravely undermined. How? The basis for the accountability purpose for the SBAC is precisely to improve college and career readiness. There is no reason to think there would be any diminution in the utility of the test for accountability purposes if it became high stakes.

If students study for the SBAC they actually learn what they are supposed to learn in high school. If teachers focus on the material on the test then they are focusing on California’s academic content standards while simultaneously teaching material validated to be just as predictive of college success as the existing admissions tests. Analysis to directly assess the equity outcomes of using the SBAC for admission (or eligibility) can only be done hypothetically until a high-stakes administration occurs.

³ Kurlaender, M., & Cohen, K. (2019, March). *Predicting college success: How do different high school assessments measure up?* [Report]. Policy Analysis for California Education (PACE). <https://edpolicyinca.org/publications/predicting-college-success-how-do-different-high-school-assessments-measure-2019>

Instructional validity

Although the STTF was not charged with weighing in on the instructional validity of the SBAC, it took the liberty of arguing that the SBAC is not sensitive to instructional differences. This claim is equally valid for the SAT and ACT; both these assessments are less directly linked to the curriculum than the SBAC. Alignment studies also demonstrate that SAT and ACT content is a *subset* of the content covered by college readiness content standards under Common Core. In fact, as part of federal oversight of the Every Student Succeeds Act (ESSA), the U.S. Department of Education has requested that states that use the SAT or ACT for accountability should either supplement these tests with additional questions to cover the curriculum specified by the states or narrow their curriculum to fit the tests. **Thus, on the basis of instructional validity, it is unclear why the SBAC would not be favored over the SAT and ACT.**

Moreover, the STTF report asserts that “present levels of inequalities in K–12 education, the uneven availability of opportunity to learn means that students from less well-resourced schools will be systematically disadvantaged, again raising a more fundamental fairness and equity concern” (p. 92). **Clearly, among the tests being considered, the test most responsive to instruction would be the SBAC, which is the most closely aligned with the content of instruction.**⁴ The availability of test prep courses dilutes the ability of the state to ascribe student performance to schools and exacerbates the problem we currently face: Advantaged students and districts will do better on the tests; less advantaged schools and districts will do worse; and both outcomes will have little to do with school effort. Inequalities in K–12 education, as measured by the SBAC, are certainly a concern. Equally concerning is the lack of equitable access to: (a) SAT/ACT content, which is not directly taught in schools; (b) SAT/ACT preparation materials, which are not accessed equitably; and (c) retest opportunities, which many students cannot afford.

The STTF suggests that if the SBAC were to become an admissions test for the UC, the multiple correlations reported today would decrease. Again, the opposite could be true: There is good reason to believe that students would take these tests more seriously,

⁴ A review of the SBAC item specifications demonstrates just how closely tied to the curriculum the assessment is: <https://www.cde.ca.gov/ta/tg/sa/smarterbalresources.asp>. This document provides a valuable resource to teachers on what to teach so students can do well on the assessment. There is no comparably detailed document linking instruction to testing for the ACT and SAT.

resulting in higher multiple correlations. Absent an opportunity to test this in a nonhypothetical way, the STTF's claims are not founded.

Content alignment

The STTF report appropriately says that: “One cannot retrofit an existing test to a new purpose solely because of content alignment, without collecting and evaluating pertinent validity evidence for the new use.” It further says that the “SBAC should be subject to the same level of evidence and validation for the intended new use” (p. 92). We have, in fact, validated the SBAC's use for admissions in the exact ways the SAT has been validated for predicting college success. (As an additional point of clarification, the STTF suggests we do not subject the SBAC to the same restricted range as the SAT; in fact we do in the PACE analysis cited herein, see Footnote 4.) Even if the STTF chooses to dismiss the existing evidence, it is irresponsible to not more fully investigate the SBAC before proposing the 9-year development of a new test.

Testing administration concerns

I believe the STTF too quickly dismisses the chance to coordinate with K–12 to make the testing experience suitable for purposes of admissions. The SBAC administration is overseen by the Educational Testing Service (ETS), perhaps one of the largest assessment organizations in the country. Dismissing the SBAC entirely is a missed opportunity for the UC to work with K–12, consider these assessments more closely—with likely modifications—and offer an additional route to UC admissions (or, at minimum, to eligibility).

Given the recommendation of the STTF to eventually move away from the SAT, it is imprudent to not propose a closer investigation (for example, through a study period of a few years) allowing students to submit their SBAC scores for consideration. Doing so would provide an important opportunity both for every student in the state to participate in the requirements for UC eligibility and admission, and for the UC to test some of the unsupported claims asserted by the STTF.⁵

⁵ Additional analyses to predict student performance in specific math and reading/writing coursework at the UC would be particularly instructive.

Moreover, ignoring the state’s existing assessment of students’ college and career readiness standards—a comprehensive, accessible test given to all students—to more directly determine UC eligibility is **a missed opportunity to level the playing field for students who lack access to SAT/ACT test prep and retest opportunities.**

Conclusion

The decision on admissions testing at the UC should be made on the basis of good evidence about the alternatives. The SBAC should be considered as a college entrance exam to reduce barriers between the K–12 and postsecondary systems and help more underrepresented students meet their postsecondary aspirations. It is an assessment that is directly tied to our state’s college and career readiness curricular standards and that offers the same predictive validity for college success as the SAT. Moreover, adding the SBAC as an accepted admission exam could save districts, families, and students thousands of dollars and hours now used to prepare for and administer the SAT and ACT. **The use of the SBAC could shrink the opportunity gap for many thousands of California students, and its potential as a UC admissions alternative should not be dismissed.**

Comments on the Standardized Testing Task Force Recommendations to Review and Update Components of the Statewide Eligibility Index and Expand Eligibility in the Local Context

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The UC Academic Council’s Standardized Testing Task Force (STTF) report does not recommend discontinuation of the SAT, despite concerns that it is a potential barrier for some underrepresented students. Instead, the STTF recommends that the UC Board of Admissions and Relations with Schools (BOARS) consider increasing the number of students who qualify for the UC “admissions guarantee” through programs known as Eligibility in the Local Context (ELC) or the Statewide Index (SI; or “statewide guarantee”). The report presents a confusing picture of the admissions “guarantee” and overstates the potential effects of expanding the number of students who qualify for the guarantee through ELC or the SI without also substantially changing how campuses treat ELC students in admissions. **Confusion about how the “guarantee” works also leads the report to overstate the role of the SAT in identifying talented students who might otherwise be overlooked.**

Drawing on my experience serving on UCLA’s Committee on Undergraduate Admissions and Relations with Schools (CUARS), as well as my research related to college access, I argue that expansion of the potential referral pool (the “9-by-9”) as it currently operates is unlikely to make much difference because very few students are actually admitted and choose to enroll at a UC campus through this pathway. In fact, the admissions guarantee only affects admissions at the Merced campus, which already enrolls large shares of traditionally underrepresented students. **It is a waste of time and energy to discuss and analyze how changes in *eligibility* for ELC and the statewide guarantee would affect the composition of the potential referral pool without also considering changes to *admissions and enrollment of those students* at all campuses in the system, including the more selective ones. Such discussion also diverts needed attention from consideration of**

alternative policies that might actually increase enrollment of underrepresented groups across the system.

The Report Presents a Misleading Picture of How University of California Admissions Works

UC policy defines three “eligibility” concepts, each of which plays a different role in the admissions process. The report conflates these eligibility measures with each other and in some cases represents *eligibility* for admission as if it were actual *admission*. The report also defines “admission” as acceptance to *any* UC campus, but campuses vary considerably in selectivity, and most students seek admission not to “the UC system” but rather to a particular campus. These characterizations create confusion about how the admissions process works and especially how the ELC and SI programs do or could promote representation across the system.

The lack of clarity about admissions procedures in the report may arise in part due to conflicting messaging and confusing terminology used by BOARS and others over time, so I begin by clarifying key terms. At a minimum, students applying to be first-years must meet the “Entitled to Review” (ETR) requirements to be considered for admission to any campus in the system (this is sometimes referred to as “UC Eligible,” but I will use ETR here to avoid confusion with other eligibility concepts). Students who are ELC and/or SI-eligible will be part of the “referral pool” if they are not admitted to any campus to which they apply.

Figure 1. University of California Admissions Eligibility Concepts

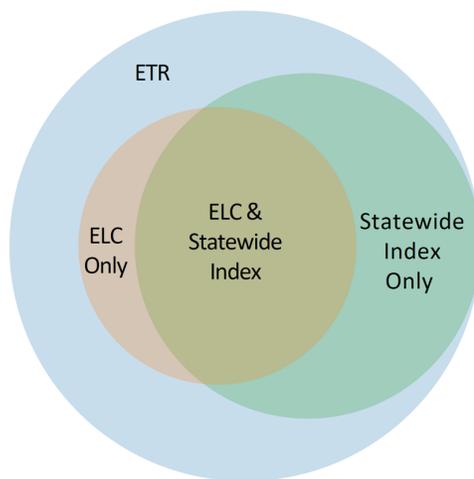


Figure 1 shows how the different eligibility concepts relate to each other (the circles are proportional in size to the number of applicants in 2018⁶); the requirements for each category are as follows:

- **Entitled to Review (ETR):** California students are ETR if they complete a specific set of 15 courses (the “a–g requirements”) with sufficiently high grades and take the SAT or ACT. With few exceptions, students cannot be admitted to a UC campus without meeting these requirements. “UC eligible” is essentially synonymous with “Entitled to Review” (ETR), as discussed below.⁷
- **Eligible in the Local Context (ELC):** Students who have a GPA that places them in the top 9 percent of their high school class *and* meet the ETR requirements are considered “Eligible in the Local Context” (ELC), assuming their high school participates in the program (most do). The requirement that students be ETR means that they must take the SAT or ACT to qualify for ELC, though their score does not affect ELC.
- **Statewide Index (SI):** Students who rank in the top 9 percent on the Statewide Index—which combines high school GPA (HS GPA) and SAT/ACT scores—and meet the ETR requirements are “Statewide Index eligible.”

ETR describes the minimum requirements any student must meet to be considered for admission, but many applications from *eligible* students will not be *competitive for admission*, particularly at the more selective campuses. No campus is required to admit any ETR student. Students who are ELC, SI, or both, and are rejected from all of the campuses to which they apply are “offered a spot at another campus if space is available.” Only the Merced campus “has space” for such students, so the guarantee effectively applies to Merced only.⁸ For example, consider a student who is ELC or SI eligible (or both) and applies to Berkeley, UCLA, San Diego, Irvine, and Riverside, and is rejected from all five campuses;

⁶ These figures come from Table 10.1 of the April 2019 BOARS report and exclude 11,400 applicants (out of 120,030 total applicants) for which eligibility was not met or eligibility status was unknown; Board of Admissions and Relations with Schools Systemwide Academic Senate, University of California (BOARS). (2019, April). *Annual report on undergraduate admissions requirements and comprehensive review* [Report].

https://senate.universityofcalifornia.edu/_files/committees/boars/boars-2019-cr-report.pdf

⁷ These requirements are described on the UC “freshman requirements” website:

<https://admission.universityofcalifornia.edu/admission-requirements/freshman-requirements>. The ETR policy was implemented in 2012; it did not change the eligibility requirements but required all campuses to review any application meeting the “freshman requirements” in Comprehensive Review; University of California Board of Regents. (2009, February 5). *Regents policy 2103: Policy on undergraduate admissions requirements*.

<https://regents.universityofcalifornia.edu/governance/policies/2103.html>

⁸ This and the above quotation are from the UC “freshman requirements” website cited in Footnote 8.

that student will be offered the opportunity to enroll at Merced. Nearly all such students turn down that offer (as detailed below).

Separate from providing a path to Merced through the “referral pool,” ELC (but not SI) is one of the “14 factors” that campuses can consider in Comprehensive Review. But recent research shows that students who have HS GPAs just above their high school’s ELC threshold are not substantially more likely to be admitted—compared to students just below the cutoff—at any campus except Merced. This suggests campuses do not give much weight to ELC separate from HS GPA.⁹ Thus, in practice, ELC designation simply guarantees admission to Merced in the same way that SI eligibility does.

Characterizing Referral Pool Eligibility as an Admissions Guarantee is Misleading

ELC and SI have been portrayed as providing an admissions guarantee, similar to “top percent programs” in other states, but this is very misleading. Whereas, for example, the top 10 percent program in Texas *guarantees* admission to *any* public university in the state, including the flagship Austin campus, UC’s program only guarantees admission to a UC campus “if space is available.” Neither the task force report nor the UC admissions website mentions the fact that only Merced has offered admission to students from the referral pool since at least 2014.¹⁰ The vast majority of students who are not admitted to the campuses to which they applied are not interested in attending Merced; in 2018, about 12,500 students were in the referral pool and offered a spot at Merced, but only 168 chose to enroll.¹¹

⁹ BOARS and individual campuses report information about the eligibility status of applicants and admitted students according to the categories in Figure 1: ETR (but not ELC or SI); SI and ELC; ELC only; and SI only. They sometimes refer, for example, to students who were both admitted and designated ELC as having been admitted *through* ELC or “ELC admits.” But the fact that a student was both admitted and ELC does not mean that they were admitted *because* they are ELC. The same logic applies to the other categories (see, e.g., BOARS, 2019).

¹⁰ BOARS’s “Comprehensive Review of Freshman Admissions at the University of California, 2003–2009” indicates that “Merced now admits the majority of referrals (eligible students who have been denied at other UC campuses),” suggesting Riverside was still participating in 2009. The 2015 Report indicates that Merced was the only participating campus by 2014; it is unclear when between 2009 and 2014 Riverside stopped participating. See BOARS. (2010, May). *Comprehensive review in freshman admissions at the University of California 2003–2009* [Report]. https://senate.universityofcalifornia.edu/_files/reports/HP_MGYreBOARS_CR_rpt.pdf; BOARS. (2015, January). *Annual report on undergraduate admissions requirements and comprehensive review* [Report]. https://senate.universityofcalifornia.edu/_files/reports/documents/BOARS2015ReporttoRegents.pdf.

¹¹ BOARS, 2019, p. 6.

Knowing that the guarantee effectively only applies to Merced, that eligible students do not find this offer attractive, and that very few students ultimately enroll via this mechanism in recent years is critical to understanding the “admissions guarantee” as it currently operates and the likely effects of any potential changes. That this key context was omitted from the task force’s discussion is troubling.

The task force includes the “space available” caveat when describing the “UC admissions guarantee,” but much of the discussion proceeds as if ELC or SI eligibility were synonymous with admission. For example, the report refers to students who are both admitted and ELC as “admitted to UC through Eligibility in the Local Context (ELC) without consideration of test scores” (p. 96). But many, likely most, of these students would have been admitted to the system (and even the campus of their choice) in the absence of the ELC program *because by definition they have high HS GPAs relative to their classmates*, and HS GPA is one of the more heavily weighted factors in Comprehensive Review. And, as discussed below, many students who are designated ELC are not admitted to the campuses to which they apply, possibly due at least in part to low test scores.

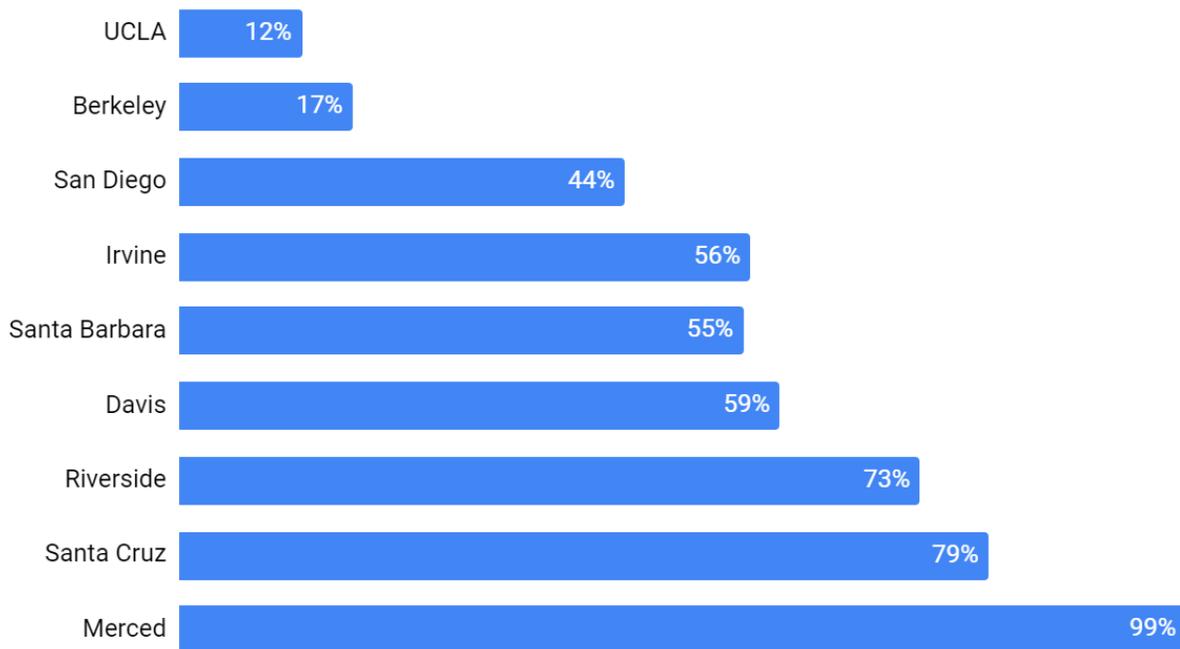
The Report Overstates the Importance of the SAT in Finding Talented Students

The report presents analysis of “index-only” students—who were not in the top 9 percent of their high school class (ELC), but were in the top 9 percent of the SI—to understand the potential role admissions tests play in identifying “talented students who do not stand out in terms of high school grades alone.” For the 2018 applicant pool, the analysis identifies 22,613 index-only students; of those, 4,931 were low income and 5,704 were first-generation college (p. 33). These numbers appear large, but recall that the guarantee only applies to the Merced campus and that only 168 students took advantage of that guarantee (some of whom were also ELC, so the number of index-only students enrolling by this path is even smaller). **The report’s conclusion that “the SAT allows many disadvantaged students to gain guarantees of admission to UC” (p. 34) is misleading; facilitating the admission of a few dozen students to a single campus does not point to a compelling need for the SAT.** And a student cannot be made eligible for admission (in the ETR sense) based on his or her SAT score. Students who meet the a–g requirements and take the SAT (or ACT) are “eligible for admission to UC” regardless of their score.

Expanding Eligibility in the Local Context in Its Current Form is Unlikely to Increase Diversity or Fairness in Admissions

The task force recommends expanding ELC (recommendation 2): “Specifically, BOARS should carefully evaluate expanding the Eligibility in the Local Context (ELC) pool by admitting more than the top 9 percent of students in each high school, when ranked by GPA” (p. 100). But, as discussed above, ELC does not “admit” students, except to the Merced campus. The report’s emphasis on admission to any campus in the system obscures the fact that admissions rates to individual campuses for marginally eligible ELC students are low. Most other campuses admit a relatively small percentage of ELC students with HS GPAs near the 9 percent cutoff, ranging from 12 percent at UCLA to 79 percent at Santa Cruz, as shown in Figure 2.¹²

Figure 2. Percentage of Applicants Near Eligibility in the Local Context Cutoff Admitted, by Campus



¹² These estimates can be found in Bleemer, Z. (2019, June). *Diversity in university admissions: Affirmative action, top percent policies, and holistic review*. Department of Economics, UC Berkeley. http://zacharybleemer.com/wp-content/uploads/2020/03/URM_Admissions_Paper.pdf. Note that the admission rate does not reach 100 percent for Merced because some students are rejected by Merced but accepted at another campus, in which case they do not qualify for the referral pool and are not offered a spot at Merced.

Why expand ELC to 10th-percentile students when so many 9th-percentile students are rejected from the campuses to which they apply? It is unlikely that campuses would admit more 10th-percentile students under such a change, compared to current practice, since campuses already consider HS GPA relative to other students in the same high school, and reject so many students eligible under existing policy. If campuses considered such students good candidates for admission, they would be admitting them. **Expanding ELC to include more than the top 9 percent would make little difference when those students are typically already ETR, and most campuses currently reject a large share of students near the existing 9 percent cutoff.**

The section of the report entitled “Likely Impacts on the Student Eligibility Pool: Some Examples” (p. 101) presents predicted changes under alternative cutoffs for ELC and/or the SI but discusses the projected changes to *the potential referral pool* (the group of students who will be offered a spot at Merced if they are rejected from all the campuses to which they apply) as if they were projected changes in *enrollment*. But qualifying for ELC or SI is not the same as admission, much less enrollment. **These simulations do not tell us about the characteristics of students who would be admitted or enrolled at the UC—much less at the more selective campuses, under different scenarios—but rather the characteristics of students who would be offered the opportunity to enroll at the Merced campus—and in all likelihood would turn down that offer.**¹³

Research Shows that Well-Designed Top Percent Programs Can Work

Several studies suggest that students admitted through “top percent” programs benefit from attending more selective colleges than they would have in the absence of such a program. In fact, prior to 2012, the UC’s ELC program (which then applied to the top 4 percent, rather than 9 percent, of each high school’s class) did function as a near-guarantee of admission to all campuses except Berkeley and Los Angeles. Evidence from that period suggests that students admitted under the program attended colleges that were more selective and had higher graduation rates compared to the colleges they would have

¹³ Newly eligible students under an ELC expansion might find Merced more attractive than students in the referral pool under current policy, but only about 1 percent of the referral pool currently takes up the offer, so even a doubling would remain a small number. This is not surprising because marginally ELC students who wish to attend Merced have a high chance of admission to Merced through the regular application process, so referral pool students have nearly all chosen not to apply to Merced, again indicating a likely lack of interest in enrolling there.

attended without the ELC program.¹⁴ Those students graduated at nearly the same rate as the average student at the same campus and ultimately benefited tremendously—posting higher graduation rates and wages later in life—compared to students who just missed qualifying for ELC. This is consistent with research on top percent programs in other states.¹⁵

Students admitted through UC’s pre-2012 ELC program were more likely to be African American or Hispanic and from lower income households compared to the average student admitted to the same campus, but the total number of students admitted via this mechanism—and the impact on diversity overall—was moderate. Evidence from Texas shows similar effects. **Overall, research shows that students with high GPAs and low test scores do well when they are admitted to more selective colleges under policies that place more weight on HS GPA, and that these policies can modestly increase diversity at the colleges that use them.**

In 2012, BOARS expanded ELC to include the top 9 percent and added the SI as a path to guaranteed admissions to the system. Although this was ostensibly an “expansion” to the program, in fact it was the opposite because the campuses that had guaranteed admission under the 4 percent rule did not continue to guarantee admission under the 9 percent rule. In theory, the Regents could try to expand the number of campuses that accept students from the referral pool, but this is likely to be unworkable considering the referral pool had more than 12,000 students last year and there are no plans for significant expansions to capacity across the system.

¹⁴ See Bleemer, Z. (2020a, January). *Top percent policies and the return to postsecondary selectivity*. Department of Economics, UC Berkeley. http://zacharybleemer.com/wp-content/uploads/2020/03/ELC_Paper.pdf. The analysis determines the effects of ELC designation by comparing students who were just above the 4 percent cutoff to those who were just below the cutoff. UCLA and Berkeley did not admit more students above the cutoff, compared to below; and Merced, Riverside, and Santa Cruz admitted most students on either side of the cutoff. Thus, in practice, the guarantee was relevant for admissions to Davis, Irvine, and San Diego, and the results show the effects of being admitted to those campuses relative to the less-selective alternatives barely eligible ELC students would otherwise have attended.

¹⁵ Black, S. E., Denning, J. T., & Rothstein, J. (2020, March). *Winners and losers? The effect of gaining and losing access to selective colleges on education and labor market outcomes*. NBER Working Paper No. 26821. http://www.sandraeblack.com/wp-content/uploads/2020/03/black_denning_rothstein_2020.pdf shows that students who benefited from the introduction of Texas’s Top Ten Percent rule saw increased college enrollment and graduation, and students displaced by the policy did not have worse outcomes.

The Regents Should Consider Alternative Approaches, Including Reforms to Eligibility in the Local Context

The Regents should study how to encourage *all campuses* to admit students who graduate with high HS GPAs but have relatively low test scores and take steps to hold campuses accountable for these students' success once enrolled. Research consistently shows that such students disproportionately come from underrepresented backgrounds *and* that they benefit from attending more selective colleges. Further, it is arguably fair that students who take advantage of the opportunities available in their high schools be afforded the opportunity to continue their education in California's more selective public colleges. **But to influence enrollment at all UC campuses, a guarantee would need to apply to all UC campuses.** Top percent rules are not the only way to achieve these goals. Campuses can—and surely do to some extent—admit students who have high HS GPAs relative to their SAT score under Comprehensive Review. BOARS and campuses should do more to assess whether they are doing enough in Comprehensive Review to identify and admit these students.

When implemented as true guarantees, top percent policies are transparent and well suited to ensuring students from a cross-section of high schools are admitted to all campuses. It is incumbent upon admissions committees to admit only students who have a reasonable chance to graduate. But it is not only what students have done before they arrive but also how the university supports them that determines whether or not they succeed. Opportunities are not equal across California's public high schools, and when even the strongest students graduating from low-opportunity public schools are not prepared to succeed in California's most selective colleges, educators at all levels (including in the UC system), need to take collective responsibility. A commitment by every campus to admit the top students from every high school, and to improve on-campus support to ensure those students can succeed if needed, would be transparent and fair.

Expanding the eligible pool without changing how campuses use that information in Comprehensive Review will do little more than increase the size of the referral pool.

The University of California Should be More Transparent About How the “Admissions Guarantee” Actually Works

Whatever decision the Regents adopt regarding the future of standardized tests and ELC and SI, the UC should be more transparent with Californians about how these programs actually work in practice. While describing the programs as providing a guarantee of admission to a UC campus that has space is technically accurate, it is misleading and confusing. I am not aware of systematic data about how students and parents understand the guarantee, but it would not be surprising if they imagined it could be a path to admission to more than a single campus. Applying to college is complicated and stressful, and complexity disadvantages low-income and first-generation students who do not have equal access to resources to navigate the process.

Discussions of admissions policy should stop characterizing ELC and SI as if the designations have much impact on which students attend which campuses. At a minimum, the UC could add a simple (and true) clarification to the description of the program, for example, replacing “you’ll be offered a spot at another campus if space is available” with “you’ll be offered a spot at the Merced campus.” Discussions of ELC and SI, in the task force’s report and elsewhere, would land differently if the program were better understood in this way.

Comments on the Standardized Testing Task Force Report’s Treatment of Predictive Validity and the Use of SATs in Current University of California Admissions

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The question of whether to retain the SAT or move away from it is an important one, and any decision should be made on the basis of the best available evidence. Unfortunately, the Academic Council’s Standardized Testing Task Force’s (STTF) report got many things wrong. It is over-reliant on very limited analyses that were conducted by the UC Office of the President (UCOP) Office of Institutional Research; it ignores key results in those analyses; and it draws confident conclusions on the basis of speculation with little or no evidence. Overall, the report does not accurately reflect what is known from the extensive body of research, within and outside the UC, on SAT scores.

I focus on three questions that are crucial to the report’s recommendations:

1. Are SAT scores useful for predicting which students will be successful at the UC?
2. Do grade inflation and differences in grading standards across high schools undermine the use of high school grades as the primary determinant of admissions?
3. Does the way that the UC uses the SAT in admissions contribute to the underrepresentation of disadvantaged groups (students from underrepresented racial and ethnic groups, lower income students, and first-generation students) at the UC?

On the first question, the task force concluded that SAT scores are more useful than high school grades (HS GPAs) in predicting student outcomes. On the second, it concluded that standardized tests are needed to “counterbalance” (p. 55) variability in high school grading standards. On the third, it concluded that UC admissions practices “compensate” (pp. 42, 45) for differences in SAT scores across demographic groups. These lead the task

force to conclude that moving away from the use of SAT in admissions would lead to admission of a less prepared class while not improving, and perhaps worsening, diversity. As I discuss below, I think the task force’s answers to all three questions are factually incorrect, and I do not believe that any of these conclusions are supported by the evidence.

We know from many prior studies, including mine¹⁶ and others¹⁷ using UC data, that the SAT plays a uniquely problematic role in college admissions. SAT scores vary much more dramatically across demographic groups than do other admissions measures, including HS GPAs. **Admissions policies that put substantial weight on SAT scores create barriers to admission for students from underrepresented groups and lead to less diversity than would policies that de-emphasize or remove the SAT.**

Many discussions of admissions policy set these incontrovertible facts against the SAT’s predictive validity for college student performance. Admitting students with low SAT scores, the report argues, means bringing in students with “a lower probability of having high grades, persisting past freshman year, and graduating” (p. 81). Perhaps the negative impact of the SAT on diversity simply reflects the gaps in preparation between groups of students, so it is unavoidable that an admissions process that seeks to identify students prepared to succeed will generate disparities in admissions rates and classes that are less diverse than the applicant pool.

There is something to this argument. It is undeniable that the group of California high school seniors who are prepared to succeed at the UC is less diverse than the graduating class as a whole. This reflects a wide range of inequities in our society and our K–12 education system. The UC could certainly do more to help ameliorate these inequities through research and programs aimed at K–12 students. But the STTF report is correct in that changes in admissions policy—short of abandoning the use of preparedness as a criterion—would not on their own be sufficient to eliminate access gaps.

¹⁶ Rothstein, J. M. (2004). College performance predictions and the SAT. *Journal of Econometrics*, 121(1–2), 297–317. <https://doi.org/10.1016/j.jeconom.2003.10.003>

¹⁷ Geiser, S. (2020, March 18). *SAT/ACT Scores, high-school GPA, and the problem of omitted variable bias: Why the UC taskforce’s findings are spurious*. UC Berkeley Center for Studies in Higher Education, Research & Occasional Paper Series. <https://cshe.berkeley.edu/publications/satact-scores-high-school-gpa-and-problem-omitted-variable-bias-why-uc-taskforce’s>; Geiser, S., & Studley, R. (2002). UC and the SAT: Predictive validity and differential impact of the SAT I and SAT II at the University of California. *Educational Assessment*, 8(1), 1–26. https://doi.org/10.1207/S15326977EA0801_01

However, while there is some truth to the argument, it cannot be used to defend or justify the SAT's role in reducing diversity. Gaps in SAT scores between students from advantaged and disadvantaged families are larger than those in other admissions criteria—such as high school grades—and, indeed, are the *source* of much of the SAT's predictive validity. That is, **the SAT appears to be a strong predictor of student success *because* students from disadvantaged backgrounds are less prepared to succeed, and the SAT is a very effective measure of student advantage.**

While there is variation in SAT scores among students from similar backgrounds, this variation is much less predictive of success in college; prediction models that control for student background find much less predictive validity for the SAT (though not for HS GPAs) than do models without those controls.¹⁸ Most models omit controls on the grounds that we do not use these demographic factors in making admissions decisions—a decision to admit the most prepared students using all of the information available would mean giving preferences to advantaged students over disadvantaged students with the same grades and SAT scores. But this has the effect of allowing the SAT to launder information about student demographics that is not otherwise allowable in admissions, making it appear neutral when in fact it would violate our core principles to include it. Importantly, HS GPA does not serve to launder demographic information in the same way—HS GPAs are approximately as predictive of student success within as across groups.

This is a complex argument, so an analogy may be helpful. In the burgeoning field of machine learning, researchers have often trained models to predict future outcomes, such as criminal violations or health spending, with the hope of using these predictions as scores that will support fair decisions. Repeatedly, they have found that the resulting models wind up discriminating against African Americans and other disadvantaged groups.¹⁹ This is so common that it has been given a name—“machine bias.”²⁰ It arises because race and other

¹⁸ I found this in a study of UC data from the mid-1990s (Rothstein, 2004). The analysis that the UCOP Office of Institutional Research did to support the STTF report confirms that it is still true. This UCOP analysis is reproduced as Appendix I of the STTF report; within that, Appendix C indicates that the predictive validity of the SAT is much smaller within demographic groups than it is when these factors are not controlled, but the HS GPA's validity is much more robust. See also the tables in Appendix II of the STTF report, which report similar results.

¹⁹ Obermeyer, Z., Powers, B., Vogeli, C., & Mullainathan, S. (2019, October 25). Dissecting racial bias in an algorithm used to manage the health of populations. *Science*, 366(6464), 447–453.

<https://doi.org/10.1126/science.aax2342>

²⁰ Angwin, J., Larson, J., Mattu, S., & Kirchner, L. (2016, May 23). Machine bias. *ProPublica*.

<https://www.propublica.org/article/machine-bias-risk-assessments-in-criminal-sentencing>

characteristics are in fact strongly correlated with the outcomes, so an analysis that focuses solely on prediction and not on fairness will use race as a powerful predictor. One often finds that even when the model is not given race as a potential predictor, it winds up constructing a proxy for it out of the other variables that it has.

The same kinds of bias arise in predictive validity models. Student background is a powerful predictor of measured student success in college. This is due to both real differences in preparation and aspects of the college experience that are themselves biased in favor of students from advantaged backgrounds. Regardless, it means that **any measure that is strongly correlated with student background will wind up appearing to have strong predictive validity**. My research indicates that this is exactly what happens with the SAT, which has been developed over decades to have predictive power for students' grades in their first year of college. It achieves much of this predictive power by measuring student background very well.

Nothing in the task force's report indicates that any of the above, which has been found repeatedly in studies in many settings, fails to hold in current UC admissions. The task force leans too heavily on predictive power as a justification for the use of SATs; a process that maximizes prediction can lead to highly inequitable admissions rules.

The STTF report further argues that the large gaps in SAT scores between students from advantaged and disadvantaged backgrounds are not sources of disparities in admissions rates, because UC admissions "compensate" for differences in SAT scores across demographic groups. This assertion is simply unsupported. The report presents no compelling evidence for it, and I strongly suspect that a careful investigation would indicate that it is incorrect.

A decision to retain the SAT, even with plans to develop a new assessment that might come into play a decade in the future, is a decision to maintain an admissions system that puts barriers in front of students from underrepresented backgrounds, contributes to ongoing diversity problems at the UC, and is not justified by evidence about preparedness for college.

A careful reading of the evidence upon which the task force relied indicates that it is all consistent with the above. How does the report get things so wrong? I'll consider the three questions I listed above separately.

Are SAT Scores Useful for Predicting Which Students Will be Successful at the University of California?

To answer this question, the report draws on analyses that examine the share of variation in UC student outcomes (such as first-year GPAs) that can be explained by SAT scores and HS GPAs. It finds that the share explained by SATs has risen over time and is now larger than the share explained by HS GPAs.

There are three problems with this analysis:

First, as discussed above, it does not address the inflation of the SAT's predictive power by its correlation with student background. This allows the SAT to launder information about student demographics into the admissions process, creating what amounts to an admissions penalty for students from disadvantaged backgrounds. The task force argues that the UC "compensates" for demographic variation in SAT scores (though see the discussion below); if so, only the much weaker within-group predictive power is relevant for assessing whether SATs contribute to identifying students who will succeed at the UC.

Second, the report fails to account for the impact that admissions decisions have on predictive relationships. UC admissions weight HS GPAs quite highly. In order for a low-HS GPA student to be admitted, she needs to have something else very good about her application—but this is not measured in the prediction model. This attenuates the predictive power of HS GPA. Because the holistic review de-emphasizes SAT scores, the SAT's predictive power is not attenuated to nearly the same degree. The report makes much of the increase in the SAT's measured predictive power over time, and the decline in that of HS GPA, but this is all plausibly an artifact of the changing weight put on these variables as the UC shifted gradually to holistic review.²¹

Last, the report does not attend carefully to the multistage nature of the UC admissions process, with a purely quantitative evaluation used for systemwide eligibility determinations and then holistic review used for campus admissions. Analyses of the role of SAT scores in admissions decisions, among eligible students who are supposed to be promised admission to at least one campus, are driven as much by students' application

²¹ Indeed, the UC's own analyses, in Section IV of Appendix I of the STTF report, confirm this, referring to it as the "Compositional Explanation." The STTF report itself does not discuss these results.

choices as by actual admissions criteria—two students with identical qualifications would be treated as having different admissions outcomes if one included the less selective campuses in her application portfolio and the other did not. Similarly, most of the report’s analyses of the SAT’s predictive power pool together the nine UC campuses without adjusting for the fact that a given grade at Santa Cruz may mean something very different than the same grade at UCLA, or that the different campuses draw students with very different SAT distributions.

In my analysis of UC admissions in 1993,²² I dealt with all three of these issues, and found that SAT scores contributed little to predicting student success but created important barriers to the admission of students from disadvantaged backgrounds. The analyses of recent data that the UC has conducted indicate that these conclusions still hold nearly 30 years later: The SAT adds modestly to predictions based on HS GPA but contributes less predictive power than HS GPA and draws much of the power it has from demographic variation that would not legitimately be included in admissions decisions on its own. Indeed, a recent study by Zach Bleemer²³ found that low-SAT score, high-HS GPA students admitted under ELC (before it was expanded and most campuses began ignoring it)²⁴ benefited dramatically from it, with higher graduation rates and early career earnings than those who just missed out. This belies the idea that their low SATs forecast poor performance.

Do Grade Inflation and Differences in Grading Standards Across High Schools Undermine the Use of High School Grades as the Primary Determinant of Admissions?

The task force attributes its mistaken conclusion that SAT scores are more predictive than HS GPAs to supposed variation in the meaning of HS GPAs across high schools and over time. The College Board has long claimed that this variation makes HS GPAs unreliable measures for use in admissions. While intuitive, there is remarkably little evidence for this claim and the task force does not present any. In my own work, I found that HS GPAs are as predictive of college success across as within high schools, indicating that differences in

²² Rothstein, 2004.

²³ Bleemer, Z. (2018, September). *The effect of selective public research university enrollment: Evidence from California*. IRLE Working Paper No. 101-18. <https://irle.berkeley.edu/files/2018/09/The-Effect-of-Selective-Public-Research-University-Enrollment.pdf>

²⁴ Bleemer, 2019.

grading standards do not undercut validity of HS GPAs.²⁵ The task force’s confident prediction that differences in grading standards would undermine a non-SAT-based admissions policy is simply unsupported.

Does the Way That the University of California Uses the SAT in Admissions Contribute to the Underrepresentation of Disadvantaged Groups (Students from Underrepresented Racial and Ethnic Groups, Lower Income Students, and First-Generation Students) at the University of California?

The report answers this by noting that SAT gaps between students of different races or other demographic groups are roughly the same among UC applicants as among admitted students. This is a meaningless comparison at best, and likely misleading. In most settings, one expects that a race-blind admissions rule will lead to *smaller* gaps among admitted students than among applicants, so the fact that it does not do so at the UC is worrisome.

But this comparison of all applicants to all admits is a very indirect way to assess the role that SATs are playing in admissions. It would be straightforward to investigate this question directly with the UC’s own data. If the various UC campuses “compensate” for test score gaps, we would expect that between-group differences in SAT scores would have no predictive power for admissions decisions, while within-group differences would be more predictive. The task force report has no evidence of this type. Absent such evidence, the presumption should be that the inclusion of the SAT, with much larger gaps than other measures, does in fact disadvantage students from lower scoring groups. Similarly, while the report speculates that dropping the SAT would *increase* enrollment diversity, it presents no evidence for this speculation. It would again be straightforward to examine this in the UC’s own data, by simulating alternative admissions rules. I am confident that these would show that eliminating the SAT would increase diversity among admitted students.

When taking all of these issues together and relying on the available evidence rather than on the task force’s often highly speculative claims, it is clear that the SAT plays a very different role in UC admissions than the task force’s report makes it appear. The SAT erects

²⁵ Rothstein, 2004. This is supported by recent evidence. See Bleemer, Z. (2020b, February). Grade inflation at more- and less-affluent high schools [Policy brief 2020.1]. UC-CHP. <http://zacharybleemer.com/wp-content/uploads/2020/03/UC-CHP-2020.1-Grade-Inflation.pdf>

a substantial barrier against the admission of students from underrepresented groups, while doing little to help identify students within these groups who are prepared to succeed in college. There is no basis for the view that UC “compensates” for this barrier and, in any event, there are alternative measures available that would be as useful for identifying preparedness without creating such a large barrier to begin with. Moreover, the task force’s argument against simply putting more weight on high school grades—as in the UC’s existing ELC program—is unsupported by evidence. The UC has many options for developing a fairer admissions process in the near term that does not rely on the SAT.

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