May 18, 2020

University of California Board of Regents
c/o Office of the Secretary and Chief of Staff to the Regents
1111 Franklin St., 12th Floor
Oakland, CA 94607

Dear Board of Regents Members:

I’m writing about the current matter before you regarding the use of standardized testing in college admissions. This week, your Board of Regents will be asked to make a potentially far-reaching decision that will impact hundreds of thousands of young adults and send ripple effects across the broader education community — all compounded by the additional anxiety and unsettled landscape presented by the COVID-19 crisis, a massive state budget deficit that includes significant funding adjustments to the University of California (UC) system and your pending leadership transition to a new President.

In a staff report released last week, President Janet Napolitano presented new recommendations for your consideration that we fear will inadvertently create more confusion, present varying scenarios without clarity of a final direction and ultimately drive more angst.

- How much will a new assessment cost and what are the current COVID-19 budget impacts to the UC system?
- How will you implement a new assessment system and stay within the proposed five-year timeline?
- Will the new president be ready to tackle one of the largest policy shifts in your system’s history and should they have had any role in developing a recommendation?
- Should students be forced to now prepare for three standardized tests (a new TBD UC exam, the ACT and SAT)?
- Will this move really address simmering equity and access issues in education?

For more than a year, and at the request of President Napolitano, the University of California’s Standardized Testing Task Force (STTF) has been “analytically, without prejudice or presupposition” examining the UC system’s current use of standardized testing in undergraduate admissions, primarily to determine if tests fairly promote diversity. Through their extensive research-based evaluation, the STTF found that the current use of standardized testing in the UC system does not attribute inequity or bias toward a specific student population or demographic group, and that they are highly predictive of a student’s first-year college success, retention and graduation.
While the taskforce did recommend that the UC system look into finding or adopting a new testing assessment within nine years, they ultimately suggested that the UC system not move to a test-optional or test-blind policy given the “UC’s size and unique system.”

The STTF recommendations were thoroughly reviewed and ultimately adopted with overwhelming support by the UC Academic Senate, the system’s very own set of experts, represented by a diverse group of faculty and administrators from across the state. The Senate agreed with the STTF findings that the UC’s current use of standardized test scores in fact helps protect rather than prevent admissions eligibility for minority, underrepresented and low-income student populations, and that a test-optional policy should not be adopted.

Regarding the development of a new assessment, the Academic Senate questioned the UC’s capacity to develop a new tool, acknowledging the costly impacts — some estimates are as high as $100 million — and potential burden a new exam may put on students, particularly those who would be required to take both a UC-specific test and the ACT or SAT for admissions to other institutions.

And yet, despite all of the thoughtful analysis, President Napolitano has now proposed a completely new timeline and set of work that does not reflect the recommendations of your own STTF and the Academic Senate. Instead, she recommends implementing a “test-blind” policy by 2025 if a new assessment is not developed by then and shortening the timeframe for a new assessment from nine years to five. Her recommendations also suggest the use of the Smarter Balanced Assessment Consortium (SBAC) as a new and/or modified testing metric for the UC system, despite the fact that both the STTF and the Academic Senate agreed that the SBAC is not a viable option due to its wide range of restrictions and limitations.

Given the current COVID-19 pandemic, we understand and support temporary measures to implement test-optional policies. During these uncertain times, provisional actions provide students and families much-needed relief. I recognize that these recent decisions are incredibly difficult to make, and I respect the right of academic leaders to choose the best solutions for their institutions and students during this difficult and unprecedented time.

But these new recommendations will further the uncertainty and anxiety of students and their families at a time when they need all the reassurances and resources we can provide. The sweeping proposal will also strain admissions offices, state budget and the broader education system, creating more questions and concerns about fairness, equity, comparability and reliability that will make admissions much more subjective.

As you go into your Regents meeting, I hope you keep these issues and consequences top of mind. I understand that more can be done to address the issues of equity, access and diversity
throughout all university systems — and as an organization, we will continue to be proactively engaged in this effort.

We share the belief that every student, regardless of economic status, race or ethnicity, age, gender, gender identity or geography should have the tools, support and resources to succeed in college and in their careers. For more than 60 years, our organization has been helping students achieve college and workplace success and has dedicated tremendous resources in addressing these issues in our nation’s education system.

As always, ACT is ready and willing to partner with you so that the dream of higher education is within reach for all students who seek it. We hope you will create a pathway for researchers, institutions, key stakeholders and academic leaders to come together and develop a viable, practical solution based on sound science and research.

Thank you for your consideration. I am optimistic that we can work together for a reasonable path forward for students and your institutions.

Sincerely,

Marten Roorda
Chief Executive Officer
ACT