



Marten Roorda
Chief Executive Officer

January 6, 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 today regarding the current policy dialogue on the issue of standardized testing. Here at ACT, we appreciate the serious evaluation being completed by the UC Academic Senate Standardized Testing Task Force (STTF) and agree that testing must be fair to all students. We understand that the policy decisions that this board will soon contemplate will impact millions of students.

California at all levels is seeking to address the broader and profoundly foundational issues of access and equity — in healthcare, water, housing, income and, of course, education.

We certainly recognize that the highly impacted and vast UC system is uniquely challenged in addressing this issue. Your admissions offices are tasked with holistically considering 200,000+ applicants annually — far beyond the scale and reach of most other university systems. Your world-renowned system offers national and international students alike unbounded educational opportunity, but that highly-sought admission has driven record-breaking numbers of applications.

Our organization, a nonprofit with 60 years of experience helping students achieve college and workplace success, is committed to working with you to find meaningful solutions to support underserved students in California while advancing strategies and solutions that address equity and access in education across the country.

ACT has developed a trusted, accurate, and fair testing program that assesses academic skills and achievement to help students understand and improve their readiness for college. Decades of research have shown that the combination of high school grades and standardized test scores is the single best predictor of first-year college success. The ACT was designed to support not only college admissions but also university course placement, student guidance, and scholarship decisions — critical components to ensuring that students enroll in courses in which they're ready to succeed, are aware of majors and careers that match their interests and skills, are eligible for needed financial aid, and are better positioned to graduate on time.

Grounded in realistic, practical research, the ACT is among a small number of instruments used to evaluate college readiness and among an even smaller number of tools that provide a common metric across all states and throughout the world. At a time when we are looking to invest in our students, increase our acceptance rates, and build a competitive workforce, we should provide the UC system with more tools to review the overwhelming volume of applicants, not fewer.

We understand your task force is considering many options, including but not limited to a "test-optional" model. While some schools have adopted the test-optional model — Wake Forest University and University of Chicago among the most prominent — they don't compare to the size and reach of the UC system. Unlike the UCs, these schools tend to be demonstrably smaller private schools that have the capacity to use more personalized admissions criteria, such as in-person interviews and video introductions.

Removing the testing component may create a new set of problems for the Board to review in the upcoming years. The proliferation of “grade inflation” — already a big problem — will become even more of an issue, particularly in wealthy districts and private schools where college counselors are provided, custom learning resources are offered, and assertive parents are willing to negotiate with teachers. Relying solely on GPA as an admissions standard will ultimately exacerbate the problem by increasing pressure on teachers and high school administrators and further tilting an already uneven playing field.

Another reality is that many underserved students benefit greatly from standardized testing as a counterweight for less-than-stellar GPAs resulting from difficult high school environments and/or personal hardships. An ACT test score provides a useful context for considering student grades received in different courses using different grading standards and having different levels of rigor. Without test scores, admissions officers can only reconcile different grading standards with school-level factors that are not under the student’s control and that may create biases which disadvantage students unfairly. Eliminating testing or moving to a test-optional policy would have the reverse effect — closing doors to schools that could have otherwise been opened by their test score and preventing opportunities for numerous scholarships based on established standardized test scores.

Additionally, when considering the use of the Smarter Balanced Assessment Consortium (SBAC) test as an alternative, it’s important to remember its inherent limitations. The SBAC was never designed to measure college readiness and, therefore, isn’t necessarily focused on the skills and knowledge needed for success in college coursework. The ACT provides a common metric throughout the country and internationally, while the SBAC is limited to a one-time test experience (with no opportunity for retesting) and to public school students in a few states. An entirely new high school test-taking infrastructure would need to be established — further straining teachers and classroom time — with no reassurance that the issue of equity and diversity in college admissions would be addressed. At this time there is no fair and accurate way to link scores from SBAC to ACT or SAT scores, which would create confusion between two separate and unequal processes. Finally, our internal analyses show that student-group differences on SBAC and ACT results are nearly identical, and we strongly recommend that the Board evaluate this issue if there is an expectation of a decrease in achievement gaps.

The unintended consequences outlined above must be fully considered before further straining our teachers, admissions offices, students, and the broader education system.

Most importantly, the issue of test equity reflects much deeper problems in the U.S. education system that can’t be addressed by a sweeping decision on standardized testing. The ACT empirically measures knowledge and skills that students should have been exposed to and had an opportunity to learn in high school. Regardless of student or district, the test scores provide an objective indicator of improvement opportunities for struggling schools. So, while removing standardized testing from college admissions is a perceived solution, it does not address the underlying and systemic inequities that cause the achievement gaps revealed by the tests. It is a short-term Band-Aid that shortchanges students in the long run.

We’re here to roll up our sleeves with you. As an organization, we are proactively addressing testing inequities and making sure students have equal access to test preparation tools, including the following:

- The ACT provides more test-prep resources to students than ever before, including access to free online learning resources like video lessons, interactive practice questions, full-length practice tests, educational games, and other materials.

- Nearly every year, ACT provides more than a half-million fee waivers to low-income students across the country, allowing them to take the ACT up to two times for free. These students also have free access to our test prep programs ACT Online Prep and ACT Rapid Review - All Access, which provides on-demand, livestream tutoring from expert teachers.
- We constantly research, innovate, and expand our free educational tools and test preparation resources to help students on their journey to higher education and beyond.
- Students with documented disabilities have access to accommodations during the ACT test to ensure they have equal opportunity to show their academic readiness.
- ACT offers test support to U.S. students who are English learners and whose proficiency in English may prevent them from fully demonstrating the skills and knowledge they've learned in school.

ACT will continue partnering with educational institutions and leaders in academia to ensure access, fairness, and improved education outcomes for all. 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.

We stand ready to partner with the University of California Board of Regents to level the playing field in college admissions, so that the dream of higher education is within reach for all students who seek it.

I look forward to working with you to find a viable, practical solution.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Roorda', with a large, stylized loop at the beginning and a horizontal line extending to the right.

Marten Roorda
Chief Executive Officer