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Chair of the Assembly and the Academic Council
Faculty Representative to the Board of Regents
University of California
1111 Franklin Street, 12th Floor
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January 28, 2010

**MARK YUDOF, PRESIDENT
UNIVERSITY OF CALIFORNIA**

Re: Eligibility Reform and its Diversity Impact

Dear Mark:

Enclosed please find a memo from the Board of Admissions and Relations with Schools (BOARS), which was unanimously endorsed by the Academic Council, clarifying the intent of the eligibility policy approved by the Regents in February, 2009. The memo responds to several critiques from external groups which stem from basic misunderstandings of the rationale for and structure of the policy. It also outlines BOARS' expectations about the impact it will have on improving the fairness of the UC admissions process, and increasing access to the University of California by opening the doors to a larger number of California students from every high school in the state.

I recommend this very clear statement of the goals and structure of this policy to you and to any constituency with questions about the policy. Please distribute it widely and do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Henry C. Powell'.

Henry C. Powell, Chair
Academic Council

Copy: Academic Council
Steve Juarez, AVP and Director, State Governmental Relations
Martha Winnacker, Academic Senate Executive Director

Encl.



BOARD OF ADMISSIONS AND RELATIONS WITH SCHOOLS (BOARS)

Sylvia Hurtado, Chair
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January 22, 2010

HENRY POWELL, CHAIR
ACADEMIC COUNCIL

Re: Eligibility Reform and its Diversity Impact

Dear Harry,

In February 2009, at the recommendation of President Yudof, the UC Regents adopted a new University of California freshman admissions policy, originally proposed by the Board of Admissions and Relations with Schools (BOARS) and endorsed by the full Academic Senate after two rounds of systemwide review and revision.

As you know, some elements of the “Entitled to Review” (ETR) policy continue to be controversial. Understandably, the public is concerned about the impact it could have on the ability of their communities and constituencies to access a UC education. While these concerns are understandable, we believe they stem from basic misunderstandings about the rationale for and structure of the policy. In the attached memorandum, BOARS addresses some of the specific issues raised by external critics of the policy, clarifies our intentions and goals for ETR, and articulates our perspective about the impact it will have on UC access and diversity.

In short, BOARS is confident that ETR will improve the fairness of the UC admissions process and increase access to the University of California. It will open the door to a UC education more widely by giving more college-going California students an opportunity to have their accomplishments reviewed by UC campuses in the context of opportunities available to them; extend UC’s historic admission guarantee to more students in *every* California high school; and remove discouraging barriers to access. The policy will make more of the best students available to UC and allow campuses to select from among them using comprehensive review. In so doing, it extends the opportunity of a UC education to substantial numbers of students who historically have not attended UC.

These are longstanding goals of the UC faculty and the Academic Senate, and we believe they are consistent with the goals of our critics. BOARS holds the UC public mission in very high regard. We are committed to the goals of access and diversity in higher education, and would not have proposed the ETR policy if we did not believe it would benefit many groups.

BOARS is preparing for the implementation of the policy in 2012 by developing a series of strategies to ensure that ETR works as intended. We are studying and will continue to study its impact on access and diversity in the context of other factors like enrollment and budget constraints that may also affect diversity and access in the coming years.

We request that you forward this memo to the President and any constituencies that raise questions about diversity impacts of the new policy.

Sincerely,

A handwritten signature in black ink that reads "Sylvia Hurtado". The signature is written in a cursive, flowing style.

Sylvia Hurtado
BOARS Chair

cc: BOARS
Martha Winnacker, Senate Executive Director

Encl.

Eligibility Reform at the University of California and its Diversity Impact

I. A New Policy in the Context of Diversity

A number of converging events influenced the development of a revised eligibility policy by the University of California's Academic Senate. First, the Senate's Board of Admissions and Relations with Schools (BOARS) had after long and careful study, come to the conclusion that the current policy functioned to exclude as "ineligible" large numbers of students who actually present strong qualifications, and who would, in fact, be deemed worthy of admission by one or more UC campuses were it not for their ineligible status. A second realization was that, following each CPEC eligibility study, the Academic Senate, in managing the top 12.5% for admission to UC, was effectively restricted to a single tool: raising an index based on a rather narrow set of criteria (High School Grade Point Average [HS GPA] and test scores).

Third, since passage of Proposition 209, campuses have adopted comprehensive review processes in selective admissions. These processes follow the 14 criteria established by BOARS as guidelines in 2001, including the evaluation of individual students within the context of opportunity in their schools, and information available in students' files about academic and personal accomplishments. Such context-sensitive review has long been regarded as a common-sense best practice among highly selective institutions across the country.

A fourth important event, again related to constraints on admissions related to race/ethnicity, was the introduction of an access guarantee based on Eligibility in the Local Context (ELC), which was approved by the Regents in 1998, three years after the passage of Special Policy 1 (SP1) and Special Policy 2 (SP2) that ended the use of race, ethnicity, and gender in UC admissions. The main success of ELC was the recruitment of qualified students who had not previously considered UC as an option. It was a policy BOARS considered worth expanding to reach more students in high schools across the state. Finally, a fifth important element of the context in which the new policy was developed was the College Board's decision to make significant changes in the SAT test, which led the Regents to instruct BOARS to review the use of required tests. BOARS reviewed the use of tests in terms of their benefits in selection, adherence to testing principles, and their social costs. Many studies have been reviewed as part of this evaluation and are detailed in BOARS' December 2009 report to the UC Regents on Admissions Tests and UC Principles for Admissions Testing.¹

At the recommendation of President Yudof, the Regents adopted the Senate-approved eligibility policy in February 2009, with implementation scheduled for 2012. The new policy confers the right to a full application review to a broader pool of college-going California students, while *ending the practice of excluding many high-achieving students* from UC solely on the basis of failure to comply with UC's unusually extensive standardized-testing requirements. This policy was developed by BOARS and endorsed by the Academic Senate because it is inherently fairer than the current eligibility policy. The new policy provides many more California high school graduates the opportunity to have their accomplishments reviewed in the context of opportunities available to them, removes a barrier to access, and expands the guarantee of admission in *every* California high school. Under the new policy, all students must still meet minimum criteria to be entitled to a review, and all students are subject to a comprehensive review before a decision is rendered regarding admission.

¹ http://www.universityofcalifornia.edu/senate/committees/boars/boars.testingrpt.toRegents_000.pdf

II. Diversity Impact of Key Components of the Reform

Our goal is to give the most talented and diverse group of students the opportunity to present their best case in selective admission to UC, and allow campuses to select from among them using the appropriately broad criteria set forth in the 2001 Comprehensive Review Guidelines². Key components of the reform include removal of the SAT Subject tests as a strict requirement of eligibility for UC, the expansion of ELC, and entitling to a comprehensive review all students who have met 11 of the 15 a-g course requirements with a 3.0 HS GPA (weighted) by the end of 11th grade (with completion of the full pattern of 15 a-g courses required by graduation). The characteristics of students entitled to review (ETR) compared with currently eligible students are described in Section V. In addition we address recent concerns raised by external groups who requested simulations of data regarding which students will be admitted to particular campuses. We offer cautions regarding these types of simulations, which among other issues lack estimates of growth for particular populations and measures actually used in comprehensive review processes in campus-specific admissions.

III. Removal of the Subject Tests as a Barrier to Access

The new policy eliminates the requirement of the Subject Tests for eligibility and makes these tests optional for applicants in selection by different UC campuses. BOARS determined that Subject Tests met only one of its testing principles (curriculum-based), and the tests no longer hold predictive value beyond other information in a student's file (BOARS, 2009, p. 21). The social costs of imposing Subject Tests as a requirement are evident: College Board data reveal that while 195,406 students took the new SAT Reasoning test (SAT-R) in California in 2007, only about half as many took one or more Subject tests (51%). Less than half as many low-income students took Subject tests as took the SAT-R (47%), and substantially fewer African-American (34%), Native American (37%) and Chicano/Latino (42%) students take the Subject tests compared to the SAT. Only Asian-Americans (70%) took the Subject tests in larger numbers compared to other racial/ethnic groups relative to their population of SAT test-takers. On average, Asian-Americans are also more likely to take AP exams in more subject areas than any other racial/ethnic group.³

Using 2007 California Postsecondary Education Commission (CPEC) data, we estimate that approximately 22,115 California high school graduates had GPAs of 3.0 or higher, took all the required a-g courses, and took the SAT, but were *ineligible* for UC because they were missing one or more Subject tests. While the majority of these ineligible students are white, including them would have added 1,112 African-Americans to the eligible pool in 2007, a year when only 2,371 eligible African-Americans applied to UC. Subject tests were also a barrier to 5,401 Chicano/Latino students, 149 Native Americans, 12,582 White students, and 2,488 Asian-Americans, half of whom are from under-represented Asian-American populations. These students would have otherwise been eligible for consideration of admission. Again, the smaller number of additional Asian-American students in the simulation studies prepared by UCOP has to do with the fact that they are more likely to have taken all required tests, and therefore already are more likely to be UC-eligible in greater numbers. Given the economic problems in the state, it is unlikely that college counseling will improve enough in high schools to change test-taking

² <http://www.ucop.edu/sas/adguides.html>

³ [The American Freshman: National Norms for Fall 2009 \(2010\)](#) Pryor, J. H., Hurtado, S., DeAngelo, L., Palucki Blake, L., & Tran, S. Los Angeles, CA, Higher Education Research Institute

behavior among underrepresented groups. In any case, the stunning differences in test-taking behavior among ethnic groups are a long-standing and stubborn problem that is far more complex in origin than one might suppose. Most significantly, it is more cost-effective for students to take a single core test (either the ACT or SAT), both of which have improved their predictive value due to the addition of a writing component. Any student applying to UC has the option to take and submit Subject Tests, AP, and IB examinations in their application.

IV. Expansion of Eligibility in the Local Context: Increasing Representation from Every California High School

Another key component of the reform that increases access significantly for students in all corners of the state is the expansion of the ELC guarantee of admission from the top 4% to the top 9% of each graduating class in every California high school. This part of the reform maps directly onto demographic changes in the state and identifies top performing students. High schools identify top ranking students and send their transcripts to UC for evaluation and confirmation of performance in a-g courses. It is well established that GPA and class rank are the best indicators of college success and degree completion; therefore, ELC is fair and equitable, and will strengthen diversity and excellence at UC.

Under the current eligibility policy, nearly half of UC admissions offers go to students from schools that generate only 20% of the states' graduating seniors. This suggests that the current policy is stunningly inequitable and simply works to mirror the resource distribution in high schools. The expansion of ELC is intended to change this. Using 2007 CPEC data, we estimate that under the new policy, the number of students guaranteed through ELC will more than double at over 87% of California public high schools. Overall, the study shows that of 312,960 public high school graduates in 2007, 10,609 (3.39%) were ELC under the 4% guarantee and 26,529 would have been ELC under the new 9% guarantee.

Most important is that these gains are robust and are preserved at schools that have high under-represented populations or a low Academic Performance Index (API) rating. The CPEC data show that restricting to schools where the underrepresented population is at least 50%, we find the corresponding numbers of students are: 127,721 public high school graduates, 4,283 were ELC under the 4% rule, and 10,588 would have been ELC under the new 9% guarantee. When the under-represented population is at least 75%, we find the corresponding numbers of students are: 61,957 public high school graduates, 2,239 were ELC under the 4% rule, and 5,121 would have been ELC under the new 9% guarantee. If one considers schools where the under-represented population is at least 90%, we find the corresponding numbers of students are: 24,910 public high school graduates, only 948 were ELC under the 4% rule, and 2,036 would have been ELC under the new 9% guarantee. Similar results hold for low API schools. If one considers the lowest API schools (4 or below), we find the corresponding numbers of students are: 111,337 Public High School graduates, 3,485 were ELC under the 4% rule, and 9,293 would have been ELC under the new 9% guarantee. This demonstrates that high schools with large percentages of underrepresented groups will see gains in access to UC so long as students meet ELC criteria (i.e. be among the top-ranking students completing a-g coursework).

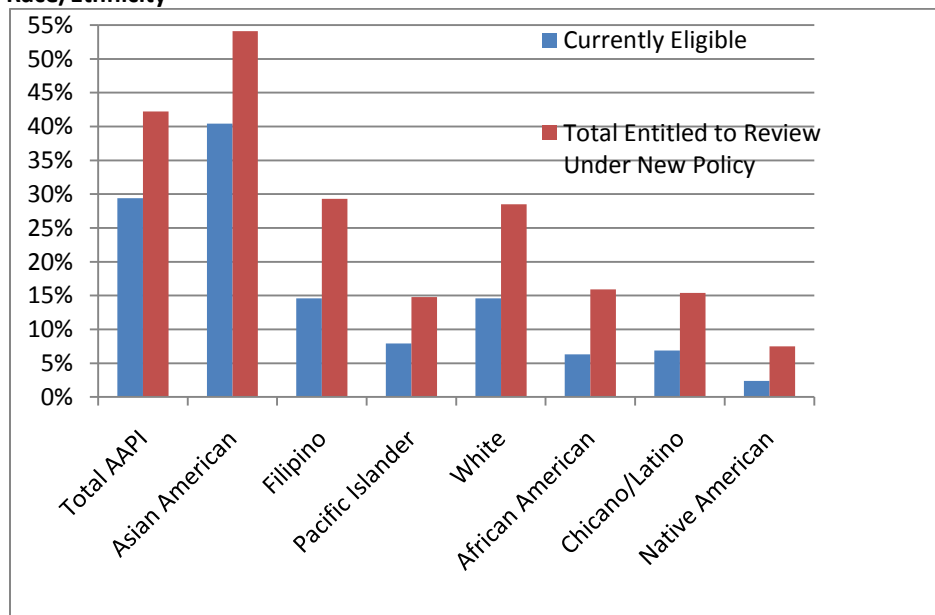
V. Entitling More Students to a Comprehensive Review

Comprehensive review allows UC campuses to use more information about each student—their high school, academic and personal accomplishments, and other special

circumstances—to make better decisions about student achievement in the context of opportunity. Much of this information is gleaned from a review of the entire admissions file reflecting students’ academic and personal accomplishments, ability to overcome life challenges, and unique talents relative to other students applying to the same campus. Students are entitled to a review if they complete 11 of the 15 a-g course requirements by the end of the 11th grade and achieve a 3.0 GPA (weighted and capped). The new policy allows more students to present their best case for selection based on much broader criteria to help campuses determine which students are at the “top” of their applicant pools based on an evaluation of criteria of key importance to local selection committees. These criteria include not only academic success but also leadership, contribution to the community, unique talents, and other qualities not assessable using an index. Under either process, students will receive a comprehensive review before a final decision is rendered, and no student is guaranteed admission to the campus of their choice (without meeting the selective criteria of that campus).

Every racial/ethnic group will benefit from the expansion of opportunity through the entitled to review criteria in the reform. We project the following percentage increases of high school graduates who will be newly able to submit an application to UC: Native American (214%), African-American (153%), Chicano/Latinos (122%), White (95%), and under-represented Asian students (96.5% total; 101% for Filipinos and 87% for Pacific Islanders). The total Asian-American cohort gains as well (43%), but these students are already highly represented among the currently eligible population. These estimates are shown using 2007 CPEC data in Figure 1. Clearly, California needs to make significant strides in closing the educational achievement gaps between racial/ethnic groups if greater student diversity and excellence is to be achieved at UC.

Figure 1. Percentage of HS Graduates Currently Eligible and Entitled to Review under the New Policy, by Race/Ethnicity



Source: 2007 CPEC data.

The main motivation for seeking change in UC’s freshman eligibility policy is the fact that the current policy guarantees admission on the basis of a very modest standard of academic success and excludes some students whose academic accomplishments surpass this standard

significantly. We note that unsurprisingly, this imbalance is disproportionately borne by less-privileged students.

For example, BOARS investigated the profiles of nearly 4,000 students who had at least a 3.2 high school GPA and were motivated to apply to UC but were declared ineligible (mostly because of a missing Subject test). They had significantly lower family incomes than students declared “eligible” (54% had incomes of \$60,000 or less); 39% were under-represented minorities; 21.9% were Asian-American; 50% were from families where *neither* parent had a 4-year degree; and 75% had not been able to participate in outreach preparation programs. Because of ineligibility, nearly 90% of these students were denied admission to UC despite having credentials comparable to many admits. Many other students simply did not apply, but potentially could be considered in review processes on campuses.

VI. Expected Outcomes and Predicting Diversity from Simulations

Virtually all projections regarding eligibility reform have been based on either 2003 or 2007 CPEC data, and all expected outcomes reveal increases in academic qualifications as well as a larger and more diverse pool of potential applicants who will be entitled to review. That is, the reform appears to do what it was intended to do—to “cast a wider net” in search of UC-qualified students.

Asian/Pacific Islander community groups have asked for projections on not only who can apply under ETR, but also who will be admitted to specific campuses. On the basis of the campus-specific simulations provided in response, critics have charged that the new policy is discriminatory toward Asians/Pacific Islanders and African-Americans. It is important to note, however, that specific projections regarding the effect of the new policy are extremely difficult and require assumptions about applicant behavior. Because a large fraction of the new ETR pool have not had access to UC previously, we cannot model their behavior by extrapolating on the basis of past applicant behavior. As we enter an era of substantial demographic shifts and financial uncertainty, the ability to predict which students will apply and where they will apply is even more uncertain. The simulation also makes assumptions about how campuses respond using data that do not capture all the many factors that campuses consider in their comprehensive review processes.

Over the past decade, BOARS has seen the UC applicant pool growing more rapidly than the high school graduating class. The diversity of the pool along lines of ethnicity, geographic distribution, and parental income also continues to grow. We expect that the increase in applications generated through the new policy will likewise reflect greater rates of growth in these categories associated with diversity. BOARS has also seen that comprehensive review results in an admit pool that reflects increasing diversity. For example, following an intensive outreach effort, UCSB experienced a growth of 6,139 applicants for fall 2008, among them an increase of 835 African-American applicants and an increase of 2,030 Chicano/Latino applicants. After comprehensive review of files, the subsequent admit growth between the entering 2007 and 2008 classes went from 557 to 762 for African-Americans and from 3,841 to 4,486 for Chicano/Latinos, respectively. These experiences as well as those on other campuses show that as applications to UC increase, the newly added applicants become more diverse than the prior pools, and they are more successful in the comprehensive review process. Because many students may not have considered UC as an option, one of BOARS’ top priorities is outreach—getting the message out to the best high school students across the state, especially those who will be eligible for the ELC guarantee.

UCOP's recent simulations assumed that the probability of application would be analogous to that of the existing pool, which had it been applied to UCSB's 2007-2008 applicant growth would have completely missed the actual outcomes that year. This simulation model did not project the level of increase in URM applicants. We believe this is because the projected increases in applications did not take into account demographic increases in these populations in recent years, which we expect will be sustained in the new pool. Further, and importantly, close study of the complex methodology used in UCOP's admit projections has revealed serious flaws that caused the all-important applicant estimates to be unrealistically high (enormously so in the case of some campuses). We arrived at this conclusion only after the projections were widely distributed. Under BOARS' direction, UCOP recently redid the analyses using an improved methodology. They suggest essentially race-neutral effects across the system, despite the fact that the new analyses are necessarily based on extrapolating applicant behavior from past applicant data.

President Yudof has encouraged the Academic Senate to continue to study the issue, and as such, BOARS will continue to review a variety of models and projections with the aim of providing guidance to campuses in targeting outreach and aid in their review of selection processes to accommodate applicant increases. Until 2012, however, it would be imprudent and to say for certain what admits will look like at a specific UC campus.

VII. A Commitment to the Master Plan and Regents' Mandate to Seek the Most Talented and Diverse Student Body

The Master Plan specifies that the University of California is *to select from among the top one-eighth (12.5%) of the high school graduating class*. With the exception of a small percentage of applicants admitted "by Exception," all students admitted by campuses are selected from the top one-eighth as defined by current eligibility criteria. The current eligibility policy defines this 12.5% by narrow measures (test and course participation, and an index combining GPA and test scores) that do not encompass the full range of achievements of high school graduates. Each campus uses enrollment targets based on the budget to determine their admits each year, and UC is committed to the Master Plan guidelines with requisite funding. BOARS determined it was time to end the "reindexing cycle" and align eligibility with current campus practice that includes a more thorough review of each student's credentials in the context of opportunities within schools. UC needed a stable policy that would provide a basis for continued improvement in achieving both diversity and excellence as gains are made in lowering other obstacles (be they financial, access to quality K-12 curriculum, or personal life challenges). In 2001, the UC Regents reaffirmed the Academic Senate's authority under Standing Order 105.2(a)⁴ to determine the conditions for admission to UC. In doing so, BOARS seeks to meet the Regents' mandate, articulated in a May 2001 Resolution,⁵ to "enroll a student body that demonstrates high academic achievement or exceptional personal talent, and that encompasses the broad diversity of backgrounds characteristic of California."

In consultation with the Senate, BOARS developed, and the Regents approved, a fair plan to bring stability to the UC admissions process by providing that the top one-eighth of high school graduates will be determined by campus selection processes that allow them to admit the top students in their applicant pools via a comprehensive review of individual files. This also brings UC admissions processes in line with most major US universities that have adopted more

⁴ <http://www.universityofcalifornia.edu/regents/bylaws/so1052.html>

⁵ <http://www.universityofcalifornia.edu/regents/policies/6031.html>

sophisticated review processes, as well universities under race-neutral constraints.⁶ Every UC campus currently uses comprehensive review before a final decision is rendered. To ensure students across California have an opportunity to attend UC, and to enhance recruitment of a diverse pool, the policy also provides a guarantee of admission to a UC campus to the top 9% of *every* California high school graduating class as well as the top 9% statewide. BOARS has seen that as applicant pools increase in size, and as the diversity of these pools increase, the quality and the diversity of the admit pools increase accordingly. The ELC program has been extremely successful in identifying top students that hold promise for increasing the diversity and quality of the UC admit pool. In short, the new policy provides a stable and equitable way to identify the top one-eighth of California high school graduates from which UC campuses will select their admits.

VIII. Identifying the Real Threat to Increasing Diversity in UC

Although UC intends to cast a wider net for diversity and excellence as part of the new policy, state budget constraints are more likely to affect outreach and diversity. BOARS is currently working on a report about comprehensive review, and we have observed applicant and admit increases each year, except in years in which we have had to impose enrollment constraints due to state budgetary problems. In both 2005 and 2009, the groups that experienced the most significant declines in admission due to enrollment constraints were first-generation, low-income, and under-represented racial/ethnic populations. It should also be noted that despite continued focus on broadening review processes in place on campuses, the constraints of Proposition 209 also have consistently limited UC's capacity to significantly increase the representation of African-American students. Moreover, the representation of Chicano/Latinos has been substantially less than their representation in high school graduating classes. The inability to target diversity activities, constraints on enrollment targets as result of deficit funding, and a lack of outreach funding has most assuredly hampered UC's capacity to increase the diversity of our student body. We share the concerns of constituencies who understand that these issues require action on the state level to achieve diversity goals and enable UC to serve all segments of California's diverse population equitably.

In closing, while appropriate funding and outreach conditions are required to optimally achieve diversity goals, we strongly believe that the new policy is one key element in the effort toward inclusive excellence in UC admissions. BOARS is charged with continuing to study the effects of the policy and make recommendations in the future.

⁶ For example, the University of Washington abandoned the academic index in 2005, deciding their state population was better served by comprehensive review processes where applicant files would be evaluated based on the merits of each case.

References

1. Board of Admissions and Relations with Schools (2009), *Admissions Tests and UC Principles for Admissions Testing*
http://www.universityofcalifornia.edu/senate/committees/boars/boars.testingrpt.toRegents_000.pdf
2. UC Comprehensive Review Guidelines <http://www.ucop.edu/sas/adguides.html>
3. [The American Freshman: National Norms for Fall 2009 \(2010\)](#)
Pryor, J. H., Hurtado, S., DeAngelo, L., Palucki Blake, L., & Tran, S.
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