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July 27, 2017

**JANET NAPOLITANO, PRESIDENT
UNIVERSITY OF CALIFORNIA**

Re: BOARS Report on the Compare Favorably Policy for Nonresident Admission

Dear Janet:

At its July 26, 2017 meeting, the Academic Council unanimously endorsed the attached report from the Board of Admission and Relations with Schools (BOARS) on the “Compare Favorably” policy for the admission of nonresident undergraduates.

The report responds to your fall 2016 request to the Academic Senate to review the policy, specifically to clarify its (1) compliance with the California Master Plan for Higher Education and (2) its consistency with the University’s overall freshman admission goals, comprehensive review policy, and holistic review processes in place on UC campuses. As you know, a 2016 report from the State Auditor criticized the policy and the University’s nonresident admission and enrollment practices.

BOARS’ report summarizes the Committee’s work over the past year to grapple with the complex issues associated with comparing residents and nonresidents, and to analyze several alternative measures for the compare favorably evaluation. Ultimately, BOARS concludes that the existing policy provides appropriate flexibility for campuses while maintaining the University’s primary responsibility to California students, ensuring that campuses are admitting nonresidents who perform at least as well—if not better—than California residents. Although BOARS does not recommend changing the policy at this time, the Committee will continue to monitor campus compliance, report outcomes on an annual basis, and suggest adjustments as data warrant.

Sincerely,

A handwritten signature in blue ink that reads "Jim Chalfant".

Jim Chalfant, Chair
Academic Council

Cc: Provost Dorr
Vice President Holmes-Sullivan
Associate Vice President Handel
Academic Council
Senate Director Baxter
Senate Executive Directors

Board of Admissions and Relations with Schools (BOARS)
A Report to President Napolitano on the Compare Favorably Policy
July 2017

In a June 29, 2016 letter to Systemwide Academic Senate Chair Hare and Vice Chair Chalfant, President Napolitano asked that the Board of Admissions and Relations with Schools (BOARS) review its policy on the admission of nonresident undergraduate students (referred to as the “Compare Favorably” policy). This request was prompted by the California State Auditor (CSA) who, in its March 2016 report (*The University of California: Its Admissions and Financial Decisions Have Disadvantaged California Resident Students*), recommended the following:

“To meet its commitment to California residents, the university should replace its ‘compare favorably’ policy with a new admission standard for nonresident applicants that reflects the intent of the Master Plan. The admission standard should require campuses to admit only nonresidents with admissions credentials that place them in the upper half of the residents it admits.”

Adopted in 2011, BOARS’ Compare Favorably policy requires nonresident domestic and international students admitted to a UC campus to be at least as qualified, on average, compared to California residents admitted to the same campus. The policy was designed to align with the UC Board of Regents’ changes to its undergraduate student eligibility and admissions policy in 2009 and to ensure that each campus adhered to the Compare Favorably policy.

In her letter to the Academic Senate, the President reiterated her support of the Compare Favorably policy, but, in response to the CSA’s recommendation, asked the faculty to “review its current policy with respect to nonresident admission, focusing on and clarifying (1) compliance with the Master Plan and (2) consistency with the University’s overall freshman admission goals, comprehensive review admission policy, and the holistic review process in place on most UC campuses.”

This report represents the Academic Senate’s formal response to the President’s request. The report is divided into four parts. Part 1 provides a brief summary of the issues and a description of the Senate’s anticipated goals in writing this report. Part 2 describes the Compare Favorably policy as it applies to the admission of undergraduates, the Senate’s goals in developing this policy, and the extent to which the policy is aligned with the California Master Plan for Higher Education. Part 3 describes BOARS’ detailed analyses of the policy’s implementation systemwide and at each undergraduate campus, applying a variety of analytical and statistical strategies designed to assess the effectiveness of the current policy. The final section ends with a summary of findings and conclusions.

Part 1 Background and Context

The University of California (UC) has earned its reputation as one of the greatest public universities in the nation—and indeed the world—while structuring its undergraduate program to meet the needs and aspirations of the people of California. UC’s most cherished ideals venerate this dual character of the University—a local institution serving the state, and a global one benefiting the world.

While the University of California enrolls a smaller proportion of nonresident undergraduates than many of its public university peers, the number of domestic out-of-state and international undergraduates has increased significantly in the last decade.¹ Part of this growth was fueled by a global demand for education credentials, especially at the world’s best colleges and universities. For UC, out-of-state enrollment provides resident students the opportunity to gain a diverse and global perspective that is at the core of every great postsecondary education institution. Moreover, the increase in nonresident enrollments—and the supplemental tuition that these students pay—provides a much needed source of revenue as the State has reduced funding for expanded in-state enrollment.

In March 2016, the California State Auditor (CSA) released a report, concluding that the University was admitting less qualified nonresident students at the expense of California residents.² The CSA went on to contend that both the increase of nonresidents at UC and the selection of nonresidents with lesser qualifications had been abetted by the University’s Academic Senate when it adopted its Compare Favorably policy in 2011.³ The CSA based its findings on a comparison of average high school grade point average (GPA)⁴ and standardized test scores (SAT or ACT test scores) earned by California resident and nonresident applicants who had been admitted to the University.

¹ Among public universities that are members of the American Association of Universities, the average enrollment of nonresident students was 27.9 percent for the fall 2015 term. The average for the UC system was 15.5 percent for the same term. See UC’s 2016 Annual Accountability Report at <http://accountability.universityofcalifornia.edu/2016/welcome.html> for more details.

² The complete CSA report can be found here: <https://www.auditor.ca.gov/pdfs/reports/2015-107.pdf>

³ The University disagreed with a number of the CSA’s findings and issued its own report after the release of the CSA report: *Straight Talk on Hot Button Issues: UC Admissions, Finances and Transparency*. <https://www.universityofcalifornia.edu/news/straight-talk-report>

⁴ The CSA analysis used applicants’ weighted GPA, which is calculated with extra points applicants earned from UC-approved honors courses. UC contended that the weighted GPA is an inappropriate indicator for comparison of resident and nonresident applicants as residents have UC-approved honors courses that nonresidents do not have access to. Instead, the unweighted GPA was the more appropriate comparison measure.

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Since the release of the CSA's report, the Academic Senate found its findings perplexing for two reasons. First, the faculty's intent in developing the Compare Favorable policy was to create a more stringent policy for nonresident admission, not a more lenient one. Indeed, the Senate's wish was to fashion a policy that prevented the University from admitting nonresidents who were not at least as qualified, on average, as California residents and, in doing so, eliminate any incentive for campuses to admit out-of-state applicants merely for the supplemental tuition income they bring to the institution. Second, UC's guidelines regarding the admission of undergraduate students—referred to as the Comprehensive Review policy—delineate 14 factors that may be used by campuses to assess the achievements of California resident and nonresident applicants alike. High school GPA and standardized test scores do not fully represent the range of qualities and characteristics that campuses use to select applicants for admission as undergraduates.

From the outset, then, it should be understood that BOARS' review of the Compare Favorably policy as represented in this report was motivated not only by the President's request to fully examine the effectiveness of Compare Favorably, but also by a desire to determine why a policy it had developed to *increase trust* in the University's admissions process was seen as doing something quite the opposite.

During the past academic year, and in response to the President's request, BOARS investigated thoroughly the campus policies and practices related to the admission of nonresident undergraduates. That assessment included reviews of University history and Academic Senate actions, detailed examination of campus procedures, and quantitative assessments of UC resident and nonresident applicant qualifications. This work was thorough, deliberate, and time-consuming. Although BOARS had planned to finish its review in early 2017, the committee pursued a variety of additional analyses in its desire to be as completely transparent as possible in its treatment of this extremely sensitive topic and to pursue lines of inquiry not originally imagined, but which were suggested by the evidence it uncovered.

Part 2

Is the University's Compare Favorably Policy Consistent with the Master Plan?

System Eligibility and Campus Admissibility

To analyze the need for and the effectiveness of the Compare Favorably policy, it is necessary to understand some basic terms within the 1960 California Master for Plan for Higher Education. The concepts of “eligibility” and “admissibility” are central to UC’s processes for evaluating applicants for undergraduate admission.

In 1960, the Master Plan set out a structure for higher education in California. Regarding undergraduate admissions, the Master Plan recommended that:

“In order to raise materially standards for admission to the lower division, the state colleges select first-time freshmen from the top one-third (33 1/3 per cent) and the University from the top one-eighth (12 1/2 per cent) of all graduates of California public high schools”⁵

The Master Plan in 1960 further recommended that:

*Undergraduate applicants to the state colleges and the University who are legally resident in other states be required to meet higher entrance requirements than are required of residents of California, such out-of-state applicants to stand in the upper half of those ordinarily **eligible**.*⁶ [Emphasis added.]

We highlight “eligible” in the quote above because this term is essential for a thorough appreciation of the way in which UC evaluates students for admission. UC eligibility refers to the requirements that California residents must complete in order to be guaranteed admission to the UC *system*, but not necessarily to a specific campus. These eligibility requirements apply to all California residents equally. In other words, regardless of the campus to which a student wishes to apply, he or she must complete the same set of requirements as every other resident applicant. Eligibility is, therefore, a systemwide criterion, not a campus-specific one.⁷

⁵ See page 4 of <http://www.ucop.edu/acadinit/mastplan/MasterPlan1960.pdf>

⁶ See page 5 of <http://www.ucop.edu/acadinit/mastplan/MasterPlan1960.pdf>

⁷ The California Master Plan for Higher Education specifies that CA residents in the top 12.5 percent of their high school graduating class are eligible for admission to UC, but leaves the establishment of eligibility criteria to the University. If a CA resident applicant is deemed eligible, that applicant is guaranteed a place in the system. These requirements include completing a minimum of 15 “a-g” courses, maintaining a 3.0 GPA, and meeting the exam requirement (the ACT Plus Writing or the SAT with Essay).

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By contrast, *admission* is a campus responsibility. An applicant who has met minimum eligibility for admission to the UC system may or may not be sufficiently competitive for admission at UC's most selective campuses. Nevertheless, applicants who fulfill minimum requirements for admission, such as being in the 9 percent of their high school class or in the top 9 percent of the high school graduating class statewide, are still guaranteed admission at a campus somewhere in the UC system.

In the 1960s, when the Master Plan was originally drafted, "eligibility" to enter the University and "admission" to a particular campus largely was synonymous. If a student earned UC eligibility (by completing a pattern of college-preparatory courses with the minimum GPA and a qualifying score on one or more standardized examinations, such as the SAT or ACT), he/she was both eligible to enter the UC and would likely be admitted to a campus that she wished to attend.

Today, however, with increasing numbers of students wanting a college education—UCLA, San Diego, Irvine, and Berkeley receive more applications than any other public institutions in the nation—simply becoming "eligible" to enter the UC system is not enough to reasonably expect that an eligible student will be admitted to the institution's most selective campuses. There are simply too many students applying for too few spots.

It is this distinction between "eligibility" and "admissibility" that complicates the discussion of UC admission policy, especially as it pertains to nonresident applicants. The distinction is neither arcane nor speculative. It is, however, subtle and, we believe, a source of general misunderstanding in how UC's admissions process is viewed. The original Master Plan definition that nonresidents must be admitted from the "upper-half of the eligibility pool" made sense in a time when admission to any UC campus was roughly the same. Today, as admission to UC has become increasingly competitive, admitting students from the upper-half of the eligibility pool—the pool of students who have a guarantee to the UC system—would, in theory, allow a nonresident student to be eligible for admission at UC's most selective campuses (since minimal eligibility or even eligibility in the upper-half of the pool, are not sufficiently competitive to earn a place at Berkeley or UCLA). For example, nonresident applicants could make themselves eligible for admission to UCLA if they completed 15 "a-g" courses, maintained a 3.4 GPA, and received average scores on the SAT with Essay even though admitted California residents to UCLA on average would need to present much more competitive academic records.

Insufficient recognition of differences in admissions selectivity across the UC system is what, BOARS believes, led the CSA to recommend a policy that would disadvantage California resident applicants to UC rather than serve them. This issue is discussed in greater detail in the upcoming section, as well as in Part 2 of this report.

The Master Plan and the University Accommodate the Changing Face of California

As UC has evolved, especially in terms of its academic stature and desirability on the part of applicants, the Master Plan also has evolved to address the needs of a state that was growing rapidly and whose demographic profile was undergoing significant transformation. Although it remains the most influential policy guiding California higher education, the plan itself has been analyzed and modernized by subsequent Legislative reviews and revisions.⁸

Similarly, UC's Board of Regents has periodically revised the eligibility standards upon which students are admitted. In 1988, the Board established a policy on undergraduate admission (Regents Policy 2102: Policy on Undergraduate Admissions). Part of the Board's motivation was a need to recognize that the state was becoming increasingly diverse racially and ethnically and UC's policies needed to take account of the changing demographics of the state. The most often quoted aspect of this policy sets the UC admissions imperative of the day:

*"The University seeks to enroll, on each of its campuses, a student body that, beyond meeting the University's eligibility requirements, demonstrates high academic achievement or exceptional personal talent, and that encompasses the broad diversity of cultural, racial, geographic, and socioeconomic backgrounds characteristic of California."*⁹

Less appreciated—but more germane to the discussion here—is the Regents' realization that competition for admission to UC was increasing *and that this demand was beginning to vary significantly by campus*. "UC-eligibility" was no longer synonymous with campus admissibility. The last paragraph of the Regents' policy acknowledges these differences and directs the campuses to begin developing selection criteria for campus admission:

"Because applicant pools differ among the campuses of the University, each campus shall establish procedures for the selection of applicants to be admitted from its pool of eligible candidates. Such procedures shall be consistent with the principles stated above and with other applicable University policies." [Emphasis added.]

The Regents' policy speaks explicitly of a "pool of eligible candidates" from which the campuses would draw its students. Again, this highlights the central characteristic of "eligibility" as a systemwide construct that serves the needs of all campuses.

⁸ See <http://www.ucop.edu/acadinit/mastplan/mp.htm> for links to all of the Master Plan reviews.

⁹ See Regents Policy 2102: <http://regents.universityofcalifornia.edu/governance/policies/2102.html>

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The next decade witnessed a significant shift in political viewpoint, which profoundly affected the way in which UC conducted undergraduate admissions. Following California's passage of Proposition 209 in 1996, which banned, among other things, the use of race and ethnicity in the admissions process, UC's Academic Senate revised its admissions policies, balancing the need to align its admission policy with state law and with the directive of the UC Board of Regents to ensure that UC reflect the broad "racial, ethnic, and geographic diversity of California." The Academic Senate made significant changes to its undergraduate admissions policy in 1998, 2002, and, most recently in 2009. During this period, the University moved away from a policy based solely on a narrow band of quantitative indicators—namely GPA and test scores—to an admissions process that used a broader array of criteria for selection (including both quantitative and qualitative factors). As noted earlier, the policy, called Comprehensive Review, provided campuses with an opportunity to review applicants holistically, taking account, for example, of the educational context within which all applicants earned UC eligibility.

In 2009, in response to pressure that the University provide greater access to students from underserved groups, the University revised its eligibility structure, expanding Eligibility in the Local Context program from the top 4 percent to the top 9 percent of California high school graduates in each respective high school, reducing the Statewide Index to the top 9 percent of all high school graduates in the State (from the top 12.5 percent), and adding an "entitled to review" (ETR) category that expanded the number of applicants who could be considered for UC admission (but who were not guaranteed a place in the system).

The Academic Senate's efforts to create multiple paths of opportunity to UC for California residents also necessitated changes in the way in which nonresidents were evaluated for admission. Given that the University was likely to admit more nonresident students in the face of budget shortfalls from the Great Recession, the Academic Senate understood that a *campus-specific standard* must be developed to control the admission of nonresidents at campuses with varying standards for admission. In his June 17, 2011, letter to Academic Council Chair Simmons, BOARS' Chair Jacob makes explicit the Senate's intentions in developing this policy and the principles surrounding its implementation:

The purpose of this revision is to help prevent a resident applicant from claiming that his/her admission slot was taken by a nonresident with weaker credentials but a willingness to pay non-resident tuition (p. 2).¹⁰

The result was the Compare Favorably policy, adopted in 2011 by UC's systemwide Academic Council, which states:

¹⁰ BOARS Chair Jacob's letter to the Academic Council can be found here: http://senate.universityofcalifornia.edu/files/reports/DS_MGY_LPBOARSNRPrinciple6.pdf

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*Non-resident domestic and international students admitted to a campus should compare favorably to California residents admitted at that campus.*¹¹

This policy was designed to ensure that admitted nonresidents would need to be at least as qualified as California residents *regardless of the campus they wished to attend*. In addition, the policy made the campus the primary unit of comparison, enabling an “apples to apples” comparison among applicants. This also had the effect of reinforcing standards for most nonresident applicants, most of who apply to campuses that are more selective.

Moreover, the policy was rooted in the original (1960)¹² and subsequent versions of the Master Plan. In 1987, the Commission for the Review of the Master Plan for Higher Education, building on the original 1960 report, emphasized certain elements regarding admission to UC.¹³ The Commission repeated the “upper half of the eligibility pool” language as it pertains to nonresident eligibility with the following definition:

*The University of California shall select first-time freshmen from those who rank among the top one-eighth of all California public high school graduates, **with graduates of private and out-of-state secondary schools held to at least equivalent levels.*** [Emphasis added.]¹⁴

Independent of any action on the part of the University, the Commission’s renewal of the recommendation restated the definition of how out-of-state students were to be evaluated in relation to California resident applicants.

The CSA Report

Despite the Senate’s efforts to develop a policy aligned with the new fiscal, political, and operational challenges facing the University, the CSA’s final report deemed the faculty’s

¹¹ The letter of transmittal from the UC Academic Senate to the UC Administration can be found here: http://senate.universityofcalifornia.edu/files/reports/DS_MGY_LPBOARSNRPrinciple6.pdf

¹² See page 4 of the original 1960 Master Plan available at <http://www.ucop.edu/acadinit/mastplan/MasterPlan1960.pdf>

¹³ The California state legislature established the Commission for the Review of the Master Plan for Higher Education in 1984 (SB 1570), with the requirement that they issue a report to the Legislature and Governor by June 30, 1987. The final report, *The Master Plan Renewed: Unity, Equity, Quality and Efficiency in California Postsecondary Education*, can be found here: <http://www.ucop.edu/acadinit/mastplan/MPComm1987.pdf>. Appointees to the Commission were made by the Governor, Assembly Speaker, Senate Rules Committee, the State higher education systems (including independent colleges), the state Superintendent of Public Instruction, and the California Postsecondary Education Commission (see Appendix E of the report.)

¹⁴ See page 15 of *The Master Plan Renewed: Unity, Equity, Quality and Efficiency in California Postsecondary Education*: <http://www.ucop.edu/acadinit/mastplan/MPComm1987.pdf>

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adoption of the Compare Favorably standard as the means by which thousands more nonresidents could be admitted to UC, noting that the change in the policy correlated directly with a rapid increase in the enrollment of nonresidents. The CSA also implied that the new policy encouraged the admission of less-qualified nonresident students compared to residents.

The source of CSA's concerns is a belief that Compare Favorably as a policy strays far from the original intent of the Master Plan; that the Academic Senate developed this policy if not in contradiction to the Master Plan's intent, then certainly not in support of it. But the facts do not bear this out. First, as noted above, the current policy is rooted in the original and revised versions of the Master Plan, issued respectively in 1960 and in 1987. This definition has been undisturbed for over half a century and was quoted most recently by the California Legislative Analyst in 2016.¹⁵ Despite this longevity, the CSA recommended in its report that the University return to the *original* Master Plan guideline regarding the admission of nonresidents (the "upper-half" definition). What is puzzling, however, is that the CSA misinterprets the original Master Plan guideline by excluding the text regarding nonresidents being held to "equivalent levels"¹⁶ and insisting that admitted nonresident students only be in the upper-half of the eligibility pool *at every campus*.

As discussed earlier, eligibility is a systemwide construct, not one that differs depending on which campus a student wishes to attend. Creating an eligibility pool for every campus has no meaning from a Master Plan perspective and would, if implemented, mean that applicants would be required to meet nine different eligibility requirements rather than one for the system. Far from the Senate's definition, which is rooted in a Legislatively-mandated review of the Master Plan, the CSA's definition has no historical or legislative foundation.

Paradoxically, the 1960 construct, if implemented today, would provide nonresidents with *more* opportunity—not less—to be admitted to *any* UC campus, even the most selective ones like Berkeley and UCLA since *eligibility applies to the entire system*, not to individual campuses. Quoting again from BOARS' Chair Jacobs June 17, 2011 letter, he stresses this point:

*"At the time the Master Plan was written...eligibility was essentially synonymous with admission of applicants who met basic eligibility criteria, unlike today, when the most selective UC campuses admit one-quarter or fewer of their applicants. **As such, it does not make sense ... [for] a campus that admits residents only from the upper-quarter of***

¹⁵ The Legislative Analyst's Office stated that "the Master Plan allows [CSU and UC] to admit ... nonresident students if these applicants meet similar academic standards as eligible public high school graduates." See *The 2016-17 Budget: Higher Education Analysis* at <http://www.lao.ca.gov/reports/2016/3372/higher-education-022516.pdf>

¹⁶ See page 4 of <http://www.ucop.edu/acadinit/mastplan/MasterPlan1960.pdf> and page 15 of <http://www.ucop.edu/acadinit/mastplan/MPComm1987.pdf>

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their applicant pool...and admit non-residents from the upper-half of the pool
[emphasis added].

BOARS understood then—as it does now—that the original Master Plan guideline would not be effective in addressing increasing levels of selectivity across the system or in managing growth in the number of nonresident students who might apply to UC. Without some sort of campus-specific standard that applies to the unique pool of students who apply to a campus, nonresidents who presented academic qualifications in the upper-half of the statewide eligibility pool could be admitted with credentials far lower than California residents at places like Berkeley, UCLA, and San Diego. The Compare Favorably policy provides this critical campus-specific limitation.

The next part of this report addresses whether the Compare Favorably policy has been effective in ensuring that nonresident applicants to UC are at least as qualified, on average, as California residents. The issue at the center of this public policy debate is whether UC admitted students outside of California who presented academic credentials weaker, on average, than those offered by California residents.

Part 3

Are UC Admissions Practices and Outcomes Consistent with the Senate's Compare Favorably Policy?

While the Compare Favorably policy aligns with Master Plan guidelines and University policy, that in and of itself does not show that the University is fulfilling all of its duties to California students. To do so, BOARS examined whether campuses were applying the policy in a manner that is consistent with the broader Comprehensive Review policy as a whole, and that the nonresidents admitted could indeed be shown to compare favorably to California residents.

To support its review of the policy, BOARS worked closely with UC's systemwide Office of Undergraduate Admissions and Office of Institutional Research and Academic Planning to analyze several alternative measures for Compare Favorably. BOARS also commissioned other, more fine-grained analyses, to assess the degree to which campuses complied with the policy in different admissions contexts. BOARS sought the most reliable metrics for comparing residency groups and for determining the extent to which campuses are meeting the standard. BOARS also consulted campus Admissions Directors and Associate Vice Chancellors for Enrollment Management about how the policy is working, and potential options for ensuring that nonresident students admitted to UC presented better credentials for admission.

What follows in this section are BOARS' analyses, including: 1) a review of admissions data, produced annually, that focuses on GPAs and SAT scores systemwide and at every campus for California residents and nonresidents; 2) a review of UC academic performance data for California resident and nonresident students who were admitted to and enrolled at a UC campus; 3) an inquiry into the use of other metrics that might add value in the evaluation of Compare Favorably, both for the system and for the campuses; 4) a discussion of the challenges, as well as the opportunities, of assessing the Compare Favorably policy within the context of a Comprehensive Review admissions policy; and 5) the utility and precision of using high school grades and standardized tests scores in predicting student academic performance at UC.

Annual Review of Admission Data

Each year, BOARS conducts a full review of both campus and systemwide data as part of its oversight of the admissions process. In preparation for this report, each campus is required to provide detailed information about their admissions activities and outcomes, and BOARS reviews this information, along with data from the Office of Undergraduate Admissions and Office of Institutional Research and Academic Planning at the UC Office of the President. BOARS reviews all facets of the admissions process, exploring the University's successes and challenges addressing a wide range of issues including the evaluation of increasing numbers of

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applications, differences in campus yield rates, the academic success of first-generation-college and underrepresented students, the geographical distribution of applicants, and the ease of the transfer path, among other issues.

It is also important to note that student first-year success depends on both campus admission decisions and the decision of the student to come to campus. The University admits students, but it is the student's choice to accept an offer of admission and enroll at a campus.

At the conclusion of this review, BOARS releases a report detailing its findings regarding the effectiveness of the Comprehensive Review process. Current and prior reports are publicly available on the Academic Senate Web site.¹⁷ This analysis also includes a thorough look at the admission of international and domestic out-of-state students, and how the admission and yield of those students compared to those of resident applicants.

As it has done in previous years, and for this report, BOARS reviewed data summarizing quantitative measures of academic preparation, including average unweighted high school GPAs and average SAT scores for fall 2016 freshman admits from three residency categories (CA residents, domestic nonresidents, and international nonresidents), systemwide and at each campus, to determine UC's compliance with Compare Favorably. The most recent available data (see Table 1) on academic preparation show that on a systemwide basis, average SAT score and average high school GPA tend to be higher for admitted domestic and international nonresidents. Domestic nonresidents' incoming GPAs are about 0.15 points higher than California residents, and nonresidents' SAT scores exceed that of residents by over 200 points (international scores fall in the middle on both measures). The outcomes for individual campuses, however, are variable across the identified measures. At most campuses, average SAT scores tend to be higher for admitted nonresidents compared to admitted residents, but on specific campuses, average GPAs are slightly lower for nonresidents (see Tables 2 and 3).

¹⁷ BOARS' comprehensive review reports are available at <http://senate.universityofcalifornia.edu/committees/boars/reports.html>. The 2017 report is available at <http://senate.universityofcalifornia.edu/files/committees/boars/BOARS-2017-Report-to-Regents.pdf>.

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	High School GPA	Total SAT Score
California Residents	3.62	1815
Domestic Nonresidents	3.77	2036
International Nonresidents	3.71	1960

Residency	Table 2: Freshman Admit GPA by Campus—Fall 2016									
	System-wide	Berkeley	Davis	Irvine	UCLA	Merced	Riverside	San Diego	Santa Barbara	Santa Cruz
California Residents	3.62	3.89	3.82	3.79	3.89	3.40	3.49	3.85	3.76	3.61
Domestic Nonresidents	3.77	3.92	3.75	3.80	3.91	3.59	3.54	3.83	3.80	3.58
International Nonresidents	3.71	3.90	3.75	3.81	3.90	3.55	3.53	3.83	3.83	3.56

Residency	Table 3: Freshman Admit Total SAT Score by Campus—Fall 2016									
	System-wide	Berkeley	Davis	Irvine	UCLA	Merced	Riverside	San Diego	Santa Barbara	Santa Cruz
California Residents	1815	2098	1918	1910	2043	1605	1732	2002	1977	1869
Domestic Nonresidents	2036	2221	1981	1963	2174	1835	1839	2093	2063	1885
International Nonresidents	1960	2200	1999	1939	2172	1765	1785	2091	2055	1810

[Note: Information on the total number of students from each residency group admitted in 2015 and enrolled in 2016 on each campus is provided in Appendix 1 and Appendix 2 of this report.]

A closer look at the campus-specific data for 2016 show that campuses generally comply with the Compare Favorably policy, although there are anomalies requiring additional discussion. Applying high school GPA as a metric of compliance, international students and domestic nonresidents entered UC with higher GPAs than California residents at six of nine undergraduate campuses. It is worth noting that some differences are minor and do not signify meaningful differences. For example, some campus-specific differences in GPA criticized by the CSA are as small as one or two one-hundredths of a point (0.01 and 0.02). These are trivial

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variances, particularly when one considers that the difference between the letter grade of “A” and “A-” is three-tenths of a point (0.3), an order of magnitude greater. Among the “non-compliant” campuses in 2016, the biggest difference is .07. BOARS does not wish to ignore such differences, but also does not wish to suggest that such differences express widespread or willful disregard of the policy—especially given the more robust SAT data to follow. To a fair-minded judge, BOARS believes that such differences would be seen as measurement noise inherent in any metric used to measure human behavior and institutional accountability.

Applying SAT as a measure of compliance, international and domestic nonresident admits had higher scores than California resident admits at eight campuses. The smallest average difference among compliant campuses is 53 points, which, according to the College Board, represents both a statistical and substantive difference in test performance.

Taking these data collectively, all but one UC campus meets one or both standards for the Compare Favorably policy. Without apologizing for the performance of this campus, the degree of compliance across the University is very high, especially when one considers both the volume of applications that are received by the University, the extraordinary level of achievement presented by virtually all applicants, and the difficulty of meeting the exacting Compare Favorably standard within the context of a competitive, internally-dynamic admissions process. Paradoxically, the Compare Favorably policy poses a greater challenge for UC’s less selective campuses. This is because these campuses receive relatively few applications from nonresidents and, moreover, such applicants are generally not as competitive as those who apply to UC’s more competitive campuses. Compounding this challenge, predicting student yield is extremely difficult. As a result, these campuses must admit more nonresidents to ensure that some proportion will actually enroll in the fall. This necessarily depresses quantitative markers of achievement such as GPA and SAT scores. Nevertheless, BOARS reviews these markers annually (as described below) for all campuses and, where necessary, instructs the campus to take corrective actions in the subsequent admission cycle.

Annual Review of Student Success Data

BOARS also recognizes that the *sine qua non* of a college admission review process is to select students who are prepared for and will graduate from the institution, regardless of their home address. Therefore, as an additional signal of policy compliance, BOARS considers how well admitted students in each residency category are performing at UC in terms of average first-year UC GPA and first-year rates of persistence and probation. The underlying question is whether the current admissions process selects students who are prepared for the rigors of the curriculum, who make progress toward the degree, and who graduate in a timely manner. If nonresident students are performing as well as California resident students, a critical outcome of the Compare Favorably policy has been fulfilled. Data demonstrating a contrary outcome—

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for residents or nonresidents—would signal a significant problem with the University’s preparatory standards and admission review processes.

Current data indicate that, upon matriculation, domestic nonresidents and international students performed somewhat better academically than California residents (Table 4). Data from the 2015–16 academic year entering class (the most recent class for which we have data) indicate that domestic nonresidents earned first-year UC GPAs of 3.22 compared to 3.18 for international students, and 3.07 for California residents. Domestic nonresidents also have a lower academic probation rate (3.6 percent) than California residents (5.2 percent), although data show that international students are on par with Californians. California resident students, despite their slightly lower academic performance, however, were somewhat more likely to persist to a second year, which is not surprising given the additional financial, social, and logistical burdens faced by nonresident students. Appendix 2 of this report provides campus-by-campus information on average first-year UC GPA and first-year rates of persistence and probation for each residency group.

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	UC GPA ¹⁹	Persistence Rate ²⁰	Probation Rate ²¹
CA Residents	3.07	93.8%	5.2%
Domestic Nonresidents	3.22	91.4%	3.6%
International Nonresidents	3.18	93.1%	5.2%

BOARS appreciates that academic performance differences among the three residency groups are relatively small. We place no special value on these differences, understanding that measurements of this kind are not especially substantive, although they might well be statistically significant given the size of the populations in question. The important point to take away from this analysis is the fact that UC is admitting well-qualified students who are successful on our campuses and that these students do not vary in their performance based on residency. If it were true, as claimed by the CSA, that UC was engaged in admitting “less-qualified” nonresidents compared to California residents, we should see evidence of this in how well the students performed when they entered the University. That they appear to be performing at least as well—if not better—than California residents should diminish concerns that the University is engaged in the admission of nonresidents who are unprepared for academic success.

¹⁸ For transparency’s sake, three outcome measures are provided in this table: First-year GPA, first-year persistence rate, and probation rate. BOARS believes, however, that UC academic performance measures are probably best limited to first-year GPA and academic probation rates (GPA below 2.0). BOARS understands that multiple variables contribute to student academic outcomes and behavior. For example, lower persistence rates may be an effect of high tuition, housing costs, and other economic factors, not only a lack of academic preparation. Indeed, nonresident persistence rates are influenced to a greater extent by factors other than academic ability, including finances and cultural adjustments. In addition, a disproportionately high number of nonresidents are concentrated in academically difficult majors, such as engineering, where students are more likely to struggle. The recent elimination of financial aid for nonresident undergraduates may amplify the effect on persistence rates.

¹⁹ First-year UC grade point average for students first enrolling in fall 2015.

²⁰ Refers to the percent of students who completed the 2015–16 academic year and re-enrolled in fall 2016.

²¹ Refers to the percent of students at UC with a first-year GPA below 2.00.

Additional Analyses

In addition to conducting its annual review of systemwide and campus data relating to the Compare Favorably policy, BOARS initiated additional analyses to determine if other metrics might better reflect the institution's efforts to monitor compliance with this policy.

- *Analyses by Admitting Unit:* BOARS sought to address a concern that a campus-wide perspective of resident vs. nonresident admissions qualifications might mask significant differences in the qualifications of admitted students by college or department (referred to as the "admitting unit"). For example, it is possible that a campus could be in compliance with Compare Favorably for all majors in the College of Letters and Science, but not in the School of Engineering. Given that relatively larger numbers of students are admitted to a college rather than a single school, problems in compliance would not be immediately visible. To this end, BOARS analyzed GPA and SAT outcomes across admitting units at several campuses. Although this analysis was not conducted for every possible combination of admitting units within any given campus, data from the sample yielded no differences in outcomes contrary to the campus-wide findings.
- *Composite Academic Index Measures:* BOARS also investigated whether the use of UC's academic index might serve as a better representation of campus adherence to Compare Favorably. UC's academic index is a metric that combines high school GPA (based on "a-g" course completion) and standardized test scores in a formula that allows campuses to rank order student "qualifications" on purely quantitative measures associated with academic performance. Like the admitting unit analysis, findings did not reveal any special qualities of this metric not already represented separately in GPA and SAT. Of course, this is self-evident given that the academic index is merely an amalgam of these measures. Still, it was hoped that such a measure might prove to be a more readily understandable metric to explain campus compliance with Compare Favorably. BOARS decided, however, that use of such a composite index would not add a significant degree of transparency to campus admission processes.

Measuring Compare Favorably in a Comprehensive Review Environment

BOARS' lack of success in identifying a quantitative metric that summarizes the institution's admissions review process was not an unforeseen outcome on the part of the Committee. Instead, BOARS wanted to highlight the challenge of boiling down a complex and intensive admissions review process into one or two simple measurements. Under UC's Comprehensive Review policy, faculty have identified 14 factors that campuses may employ to evaluate students in their admissions processes, and many of those factors are non-quantitative in nature. While the University believes—and can demonstrate empirically—that its

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Comprehensive Review policy leads to a more diverse and more successful undergraduate student body, comparisons among individual students—across 14 separate criteria—are more difficult to undertake. The most convenient comparisons are those to be found in traditional academic markers of achievement: GPA and standardized test scores. Yet, the University has moved well beyond such a mechanistic admissions policy to one that clearly takes account of every applicant’s individual achievements and educational circumstances.

Still, BOARS wishes to be clear about the importance of traditional academic markers of students’ performance. Although BOARS considers that GPA and SAT—in and of themselves—are limited measures of student quality, the members agree that a public university must be accountable in reproducible ways and that such measures are highlighted regularly in the public discourse around college admission. BOARS does not dismiss the importance of these measures, but believes—fundamentally—that such measures are *improved* when used in combination with additional information about the educational context of every student who applies to UC. Thus, Comprehensive Review policy strives not to dismiss such traditional measures of academic achievement, but to enhance their utility by showing the educational context within which students earned these traditional markers of good performance. To make admission decisions solely on grades or test scores is antithetical to UC admissions policy not because such metrics are unimportant, but precisely because—in context—they better reveal a student’s potential for college success.

How Grades and Test Scores Predict Student Performance at UC

BOARS believes as a matter of principle that the educational context within which an applicant has prepared for college is an essential criterion for admission. To this end, campuses have a wealth of information about each California high school, such as how many AP courses are offered at the school, the average family income of UC applicants attending the school, and the percentage of students who receive free or reduced-priced lunch, which allows them to effectively evaluate applicants from those schools in comparison to their peers. UC’s Eligibility in the Local Context program also leads directly to admission to the University—and to many campuses—based on one’s performance in UC-approved high school classes. Unfortunately, UC campuses do not have the same access to this information for out-of-state and international students. Although campus offices collect as much information as possible about schools outside of California and are skilled in assessing both out-of-state applications, there is more information available locally than internationally. As a result, nonresidents’ high school GPAs may have vastly different meanings, reflecting different educational standards and grading practices across states and internationally. Standardized exams, while by no means a perfect instrument, have the benefit of being a globally standardized measure that enables comparisons among students of different educational backgrounds. Although such metrics are limited in some ways (most use multiple-choice formats), performance expectations, grading

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schemes, and content matter are similar across all counties.

The benefits of a standardized measure are also supported by additional analyses commissioned by BOARS. BOARS studied the statistical relationships between the inputs of high school unweighted GPA and test scores, and the outcome of first-year UC GPA, for California residents and nonresidents, performing regression analyses that examined the relationship between test scores and high school GPA on first year performance at UC.²² Three important outcomes were derived from this investigation. First, SAT predicts the academic performance of residents and nonresidents at UC in a similar fashion. In other words, it reliably identifies applicants—residents and nonresidents—who are likely to perform well at UC. Second, high school GPA was a weaker predictor of student academic performance at UC, especially for nonresidents. In other words, GPA is less effective in helping campuses assess the potential academic success of out-of-state students on UC campuses.

Taken together, these first two findings indicate that *when comparing nonresidents to residents*, test scores are a better predictor of student performance than high school GPA. Said differently, given the degree of variability across cultures regarding curriculum, grading practices, and performance measures, it should be little surprise that GPA is a less-robust measure of academic performance for nonresident students. This is not to suggest that such a metric is unsupportable, but to stress that its utility is less effective than a global, standardized measure inherent in the SAT and ACT.

But the third outcome, BOARS believes, is most instructive. As befitting a Comprehensive Review policy that accounts for a broad range of factors, the analysis showed that GPA and test scores, while important, do not fully explain how students will perform at UC. In fact, they account for only small amounts of the explainable variance in the regression models that were developed. With 14 factors that constitute UC's Comprehensive Review policy, no single criterion is designed to be the sole indicator of student accomplishment or quality. Were it otherwise, the policy could not be, by definition, "comprehensive." BOARS understands that campuses make admissions decisions based on multi-point comprehensive review and multiple measured of merit, not SAT or GPA alone. Many of the measures cannot be converted easily into a simple number that is comparable across residency groups, leaving us with GPA and SAT, incomplete and imperfect measures, but useful as general parameters.

²² As discussed earlier, despite the fact that the CSA did not include this in its report, BOARS believes that student performance *at UC* provides important information as to whether the University is indeed succeeding at admitting nonresidents who compare favorably to resident admits.

Part 4 Findings and Conclusions

The CSA's contention that UC is admitting nonresident students with lower academic qualifications provided BOARS with an opportunity to examine UC's Compare Favorably policy with regard to its alignment with the guidelines of the 1960 Master Plan and its subsequent revisions. BOARS devoted extensive time over multiple meetings to assessing Compare Favorably, doing so with an open mind and a willingness to make changes if appropriate. It is important to stress that the CSA and BOARS share the same public policy objective: California resident applicants should not be disadvantaged in the admissions process; nonresident applicants should be held to a higher standard, on average, for admission to the State's premier higher education institution. Even if we should disagree regarding the definition or intent of the original Master Plan, the University has stood firmly by the ideal that its public mission should ensure that California residents remain its first priority in the undergraduate admissions process.

For this report, BOARS reviewed both the language and the principles outlined in the Master Plan and concludes that the Compare Favorably policy represents a reasonable response to a university system that was becoming increasingly stratified by campus admissions selectivity. In developing the Compare Favorably policy, the Academic Senate sought to address the need for each campus—especially those with the most stringent admissions rates—to develop processes to ensure that California residents would remain privileged at *every* campus. Rather than rely on an eligibility construct that no longer fairly represented admissions across the system, the introduction of the Compare Favorably policy ensures that nonresidents must achieve at least as high a bar as California residents in seeking admission to any given UC campus.

BOARS is also aware that Compare Favorably, if characterized merely as the amalgam of any given applicant's GPA and SAT score, represents the barest approximation of UC's Comprehensive Review policy, and is thus imperfect. Still, BOARS appreciates that these traditional measures of academic achievement may be the only practical—even if imperfect—way to measure compliance with Compare Favorably. The need to be accountable as a public institution requires nothing less than reproducible measures that represent unambiguous indicators of compliance. This acknowledgement, however, also obligates that same public to be open to other markers of student accomplishment, such as student performance in college courses and their likelihood of graduation. If the University's admissions policies—whether inadvertent or by design—regularly admitted less qualified nonresident students compared to California residents, we should see nonresidents' academic performance as something less impressive than it is. But the data do not bear this out. Nonresidents earn higher grades at UC compared to residents and are less likely to end up on academic probation. Increased

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admissions of nonresident students have not led to notable decreases in the academic performance of out-of-state students, as would be expected if the University were admitting less qualified nonresident students.

BOARS also feels strongly that domestic and international nonresidents contribute positively to the University's educational environment, and to its academic excellence. The domestic and international nonresidents UC admits have strong academic credentials and bring a variety of global perspectives to UC campuses that enhance the educational experience for all students. Nonresident supplemental tuition also funds access for more California residents and augments the systemwide financial aid system that makes a UC education more affordable for residents.

In the face of increasing applications, budgetary pressures, and heightened public scrutiny, the Compare Favorably policy has held up well, providing flexibility for campuses while ensuring that the University's responsibility to California students remains paramount. As always, BOARS will continue to monitor campus compliance with this policy, report outcomes on an annual basis, and could, as data warrant, suggest adjustments to the policy. For the moment, the data suggest no change in policy is needed.

High School GPA and Test Score of UC Freshman Admits*By Campus and Residency Status**Fall 2016 (updated on 3/13/2017, added number of admits 6/6/2017)*

Campus	Residency Status ¹	Freshman Admits in Fall 2016		
		Number of admits	Average High School GPA ²	Average Total Test Score ³
Systemwide	C	70,881	3.62	1815
	D	16,832	3.77	2036
	F	17,379	3.71	1960
Berkeley	C	9,547	3.89	2098
	D	3,241	3.92	2221
	F	1,266	3.90	2200
Davis	C	18,700	3.82	1918
	D	3,577	3.75	1981
	F	6,704	3.75	1999
Irvine	C	21,277	3.79	1910
	D	2,923	3.80	1963
	F	7,430	3.81	1939
UCLA	C	10,409	3.89	2043
	D	4,580	3.91	2174
	F	2,484	3.90	2172
Merced	C	14,504	3.40	1605
	D	305	3.59	1835
	F	684	3.55	1765
Riverside	C	24,180	3.49	1732
	D	1,392	3.54	1839
	F	2,427	3.53	1785
San Diego	C	18,754	3.85	2002
	D	5,602	3.83	2093
	F	5,672	3.83	2091
Santa Barbara	C	20,095	3.76	1977
	D	3,294	3.80	2063
	F	4,192	3.83	2055
Santa Cruz	C	22,166	3.61	1869
	D	2,616	3.58	1885
	F	3,670	3.56	1810

Notes: 1. **Residency Status:** Residency status in this analysis is determined based on the residency status at the time of admission. C=California Resident; D=Out-of-State Domestic; F=International. 2. **Average High School GPA:** Unweighted high school GPA of students admitted in fall 2016. 3. **Average Total SAT Score:** highest score of SAT Reasoning (Math, Critical Reading, and Writing) or ACT equivalent (Composite and English with Writing) of fall 2016 admits.

**First Year UC GPA, Persistence Rate, and Probation
Rate of Enrolled Freshman Students**
By Campus and Residency Status
Fall 2015 (updated on 2/22/2017)

Campus	Residency Status ¹	Enrolled Students in Fall 2015			
		Enrollment	Average First Year UC GPA ²	First Year Persistence Rate ³	Probation Rate ⁵
Systemwide	C	32,630	3.07	93.8%	5.2%
	D	3,467	3.22	91.4%	3.6%
	F	5,459	3.18	93.1%	5.2%
Berkeley	C	3,945	3.34	97.1%	2.2%
	D	918	3.42	96.6%	2.0%
	F	687	3.43	95.7%	2.0%
Davis	C	4,071	3.01	93.5%	6.2%
	D	346	2.92	87.5%	9.8%
	F	952	3.11	92.4%	5.4%
Irvine	C	4,272	2.95	92.9%	6.3%
	D	289	2.93	86.1%	6.2%
	F	1,195	2.87	91.5%	11.0%
UCLA	C	4,086	3.27	97.8%	2.4%
	D	956	3.33	94.2%	1.3%
	F	636	3.45	95.9%	1.7%
Merced	C	1,776	2.72	86.1%	14.8%
	D	5	-- ⁴	--	--
	F	7	--	--	--
Riverside	C	3,889	2.86	92.5%	9.5%
	D	43	2.89	82.1%	11.6%
	F	97	2.79	88.5%	10.3%
San Diego	C	3,638	3.15	96.5%	2.7%
	D	392	3.20	92.3%	3.3%
	F	1,262	3.30	93.6%	2.5%
Santa Barbara	C	3,841	3.07	92.9%	4.2%
	D	298	3.16	84.9%	2.0%
	F	335	3.23	93.1%	3.9%
Santa Cruz	C	3,112	3.19	91.1%	3.4%
	D	220	2.99	80.9%	7.3%
	F	288	3.02	87.8%	6.9%

Notes: 1. **Residency Status:** Residency status in this analysis is determined based on the residency status at the time of admission. C=California Resident; D=Out-of-State Domestic; F=International. 2. **Average First Year UC GPA:** UC grade point average for students first enrolling in fall 2015. 3. **Persistence Rate:** Percent students who started as freshman entrants in fall 2015 and were still enrolled in fall 2016. 4. "--" means the number was not calculated due to small cell size. 5. **Probation Rate:** % Students with first year UC GPA below 2.00.