Mary Gauvain
Telephone: (510) 987-0887
Email:mary.gauvain@ucop.edu

Chair of the Assembly of the Academic Senate
Faculty Representative to the Regents
University of California
1111 Franklin Street, 12th Floor
Oakland, California 94607-5200

December 17, 2020

MICHAEL BROWN
PROVOST AND EXECUTIVE VICE PRESIDENT
UNIVERSITY OF CALIFORNIA

Re: Response to VPDUEs' Concerns about the AWPE and ELWR

Dear Michael:

At its December 2020 meeting, the Academic Council endorsed the attached letter from the University Committee on Preparatory Education (UCOPE) for circulation to the Vice Provosts and Deans for Undergraduate Education (VPDUEs). The letter responds to the VPDUE's concerns about UC's Entry Level Writing Requirement (ELWR) and the systemwide Advanced Writing Placement Examination (AWPE).

We would also like to inform you and the VPDUEs that the Academic Senate will be convening a special Task Force to discuss the future of the Entry Level Writing Requirement and to update the principles, purposes, values, and language of Senate Regulation 636, which defines the ELWR.

I respectfully request your help in transmitting this memo to the campus Vice Provost and Deans for Undergraduate Education. Please do not hesitate to contact me if you have additional questions.

Sincerely,

Mary Gauvain, Chair
Academic Council

Cc: Academic Council
        UCOPE Chair Gagnon
        Executive Director Yoon-Wu
        Chief of Staff to the Provost Peterson
        Senate Directors
        Hilary Baxter, Executive Director, Academic Senate

Encl.

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Jeffrey Gagnon, Chair
University Committee on Preparatory Education
jgagnon@ucsd.edu

University of California
1111 Franklin Street, 12th Floor
Oakland, California 94607-5200

December 4, 2020

MARY GAUVAIN, CHAIR
ACADEMIC SENATE

RE: RESPONSE TO VPDUES' MEMO REPORTING CONCERNS ABOUT THE ANALYTICAL WRITING PLACEMENT EXAM (AWPE)

Dear Mary,

In April 2019, UCOPE received the attached memo from eight Vice Provosts and Deans for Undergraduate Education (VPDUEs) which outlines this group's concerns about the systemwide AWPE and the Entry Level Writing Requirement (ELWR). In response to the VPDUE memo, our committee received the enclosed May 2019 memo from Writing Program Administrators (WPAs) and Placement Coordinators at UCB, UCLA, UCM, UCR, and UCSD as well as the January 2020 memo from Writing Researchers and WPAs at UCD, UCI, and UCSB. UCOPE wishes to thank the VPDUEs, WPAs and Writing Researchers for their interest and offers the following update to these groups as well as Academic Council.

To better understand the concerns of various stakeholders, Chair Darlene Francis and I attended the UC Writing Directors' annual meeting in April to facilitate more detailed discussions about systemwide and local challenges related to ELWR and AWPE among stakeholders on all the campuses. We followed this meeting by inviting WPAs, researchers, and invested faculty from all the campuses to discuss issues pertaining to ELWR and AWPE in a special videoconference on June 10th. During this videoconference, WPAs from UCD, UCI, UCSB, and UCSC presented a joint statement on priorities and principles at this juncture. They wanted to reaffirm, fortify and update the ELWR. To do that, they believe that the ELWR needs to: 1) better align with UC's stance on standardized tests and placement validity; 2) ensure alignment with local contexts; 3) design placement processes and tools that reflect current research on equitable best practices in writing placement. They believe the best way to honor these priorities is to enable local control of writing placement, and that revising SR 636 in 2021 is needed to achieve and honor these priorities.

WPAs from UCB, UCR, UCM, UCLA and UCSD also affirmed their commitment to the ELWR expressed support for fortifying and updating the ELWR. However, these representatives also expressed support for the AWPE as a systemwide placement mechanism for their campuses, sharing that this placement tool is effectively placing students into the proper classes on their campuses. They want to maintain a systemwide approach to writing placement and communicated that they lack the resources to implement local placement of students on their respective campuses. The WPAs are interested in working with UCOPE to set up a working group/task force that could further clarify and strengthen the language around this requirement as it is written in SR 636. In August, UCOPE leadership met with current and incoming systemwide Senate leadership to discuss establishing a task force to examine the ELWR. Senate leadership agreed that UCOPE

should submit a proposal for a task force to Academic Council in the fall. Based on these conversations, the committee is identifying concrete ways to improve the AWPE and its relationship to ELWR.

It is important to understand that elimination of the systemwide AWPE is not under consideration at present for two central reasons. Five of our undergraduate campuses (UCB, UCLA, UCM, UCR, and UCSD) are committed to utilizing the Exam. These campuses believe the Exam provides students who have not satisfied the ELWR by other means with an additional mechanism by which to meet the Requirement. Another essential consideration for keeping the AWPE at present is that standardized test scores might be unavailable to use for ELWR satisfaction sooner than has been anticipated.

Finally, I wish to emphasize the importance of regular communication and transparency between the VPDUEs and their local Preparatory Education committees. UCOPE's representatives should proactively engage with all campus stakeholders, which includes the VPDUEs and other relevant administrators. Committee members have been authorized to share pertinent, pre-decisional working documents with the appropriate UC stakeholders, and we hope that this authorization allows for more transparent and open dialogue among all stakeholders across the system on these important issues.

UCOPE asks that Academic Council transmit this memo to the campus Vice Provost and Deans for Undergraduate Education.

Sincerely,

Jeff Gagnon,
Chair, University Committee on Preparatory Education

cc: Campus Writing Program Administrators

April 15, 2019

To: University of California Committee on Preparatory Education
From: UC Vice Provosts and Deans for Undergraduate Education

Re: Analytical Writing Placement Exam (AWPE)

As administrators primarily responsible for oversight of undergraduate education across our campuses, we have a deep commitment to ensuring that students on each of our campuses can communicate effectively in writing. At present, satisfying the English Language Writing Requirement (ELWR) plays out differently on each campus. What we share, however, is the common exam given to incoming first-year students to determine whether they are in need of writing remediation, the Analytical Writing Placement Exam (AWPE). We are concerned about 1) the validity of the AWPE and the consequences of the exam for underrepresented and low-income students, and 2) the administrative structure that provides oversight of the exam. In this memo, we summarize each of these concerns.

Validity of the AWPE
As you know, the AWPE is used to determine whether students fulfill the University's Entry Level Writing Requirement (https://www.ucop.edu/elwr/process.html). Despite more than 100 years of research on writing assessment and validity of writing assessments, the AWPE exam has not changed significantly since it was implemented in the late 19th century. Now as then, students arrive at the exam, receive a brief passage and are asked to write a response to that passage. Students have two hours for the exam. Their writing is evaluated and scored using guidelines that include "persuasive reasoning," the use of examples, style, and "conventions of written English." Students whose scores fall above a certain level are deemed to have fulfilled the UC ELWR; those whose scores fall below that level must complete the ELWR in some other way, typically through an entry-level writing course. Students who do not fulfill ELWR within their first three quarters or first two semesters of enrollment at UC may not enroll in additional coursework.

Best practices suggest that one-shot timed writing tests that place students into college courses have a "weak" to "moderate" ability to predict. High school grades are actually a much better predictor of success in a college writing class than tests like the AWPE. For example, the National Council of Teachers of English/Writing Program Administrators White Paper on Writing Assessment in Colleges and Universities states unequivocally that: **"A single off-the-shelf or standardized test should never be used to make important decisions about students, teachers, or curriculum."**

This data, combined with our experience on our campuses, leads us to a number of questions about the AWPE's validity. A short list – by no means inclusive – of these questions includes the following: What evidence demonstrates the validity of the AWPE? That is, does the AWPE measure what it purports to measure? Is the AWPE a valid means to demonstrate achievement of the ELWR? Does

the task students are given elicit a sample of work that accurately represents students' skills and abilities? Are students placed appropriately based on the traits that are intended to be measured (e.g., analytical writing skills), or are other factors affecting their scores and therefore their placement? Do different populations perform differently on the assessment and, if they do, is their differentiated performance related to factors associated with the assessment, or related to something else? Given the impact of the AWPE on student progress in the UC, these and other questions about the AWPE require considerable scrutiny.

Systemwide, white students score considerably better on the AWPE than do African American, Hispanic, and International students. In 2011, the UCOP Office of Institutional Research assessed the exam's validity. It showed that "the odds of white students passing the AWPE exam [i.e., fulfilling the ELWR requirement] are about 2 times as large as the odds for Asian students, 2 and a half times as large as the odds for Black students, 3 times as large as the odds for Hispanic students and 11 times as large… as for International students." Controlling for scores on the (old version) of the SAT writing exam the scores were "still significant, but much smaller": the odds of a white student passing "are 1.7 times larger than the odds of Asian students passing, 1.3 times as large as Black students passing, [and] 1.5 times as large of Hispanic students passing." The odds that a white domestic student would pass were 9 times greater than an International student. We in the University of California take pride in the increasing diversity of our undergraduate students, so UC data that suggest the AWPE might be biased against segments of our student population are disturbing. These concerns were raised in a memo from then-UCOPE Chair Bradley Queen and five Senate (LSOE and ladder) faculty in Writing Studies/Composition and Rhetoric across the system. That memo (2016-2017) proposed an additional validity study that, to the best of our knowledge, has not been undertaken.

As there is presently a task force on the role of standardized tests such as the ACT and SAT in predicting college-success, how UC uses test scores and whether we should continue to use them, it seems that this would be an ideal time to discuss and explore the continued use of AWPE. We have reason to believe that this exam is not the most appropriate placement tool to support our increasingly diverse UC undergraduate students. We also question why writing placement is administered at the system level when math placements, and foreign language placements among others are done locally on each campus. Further, we question whether there is, indeed, any continued purpose of a systemwide Entry Level Writing requirement.

Our campuses all have well-functioning writing programs staffed by faculty in a variety of positions – ladder, SOE, and Unit 18 lecturers. All are devoted to providing outstanding writing instruction to all of our UC undergraduates. At the same time, many of these faculty members (in all employment classifications) have research specializations in writing assessment and placement. We would ask, then: apart from Senate regulations (which can be changed), why does UCOPE oversee and directly influence this academic process when the campuses have so much expertise to inform writing placement for their own students? UCOPE's reliance on a subcommittee constituted by faculty members that does not draw on the breadth and depth of expertise available across the system is puzzling.

Conclusion and Suggestions for Next Steps

As our undergraduate student population becomes increasingly diverse, so, too, do their educational needs. Serving those needs effectively requires new and different approaches, including to writing placement and instruction. Therefore, we propose a collaborative effort between the Academic Senate and the VPDUE group to identify ways to create and structure writing placement processes that are valid, fair, and responsive to campus-level needs and expertise. As a first step, we suggest a meeting between representatives of our two groups for the purpose of identifying ways to

frame the issues to be addressed and planning first steps to address them. We look forward to working with you on this critically-important matter. Please contact us through Cathy Koshland, Vice Chancellor for Undergraduate Education, UC Berkeley (vcue@berkeley.edu; ckoshland@berkeley.edu)

Jennifer Brown
Vice Provost and Dean of Undergraduate Education
UC Riverside

Michael Dennin
Vice Provost for Teaching and Learning/Dean for the Division of Undergraduate Education
UC Irvine

Richard Hughey
Vice Provost and Dean of Undergraduate Education
UC Santa Cruz

Catherine Koshland
Vice Chancellor for Undergraduate Education
UC Berkeley

Jeffrey Stopple
Associate Vice Chancellor and Dean of Undergraduate Education
UC Santa Barbara

Carolyn Thomas
Vice Provost and Dean for Undergraduate Education
UC Davis

Pat Turner
Vice Provost and Dean for Undergraduate Education
UCLA

Elizabeth Whitt
Vice Provost and Dean for Undergraduate Education
UC Merced

May 9, 2019

TO: Robert May, Systemwide Senate Chair

FROM: Writing Program Administrators and Placement Coordinators at UCLA, UCB, UCR, UCSD, and UC Merced

RE: The UC Analytical Writing Placement Examination

CC: Darlene Francis, UCOPE Chair
Brenda Abrams, UCOPE Analyst

We would like to respond to several issues that arose in the April 15th letter to UCOPE from eight UC Vice Provost/Deans for Undergraduate Education, which questioned the validity and the efficacy of the AWPE as a placement tool. We are writing as a cohort of UC Writing Program directors who find the AWPE to be a vital instrument for placing students in appropriate writing courses. The University of California's thirty-three years of successful experience with this placement tool, which originated with UCOPE and the Systemwide Academic Senate in the late 1980s, should be understood on the basis of what the exam accomplishes, not according to arguments we find inadequately considered and often inaccurate.

The first issue that we would like to address is that the VPDUE letter presents its concerns about the AWPE as if all writing directors on all UC campus find the exam problematic. That is not the case. We do acknowledge that there is considerable agreement among the UC WPAs—at this year's Writing Council meeting (with every campus but UC Santa Cruz represented), those in attendance articulated three important areas of agreement: 1) that the Entry-Level Requirement should stand; 2) that writing programs require some kind of placement in order to make sure students are enrolled in appropriate classes; and 3) that UCOPE should include several seats for UC writing program specialists, perhaps in an *ex officio* capacity. Clear differences arose at our meeting, however, when it came to our discussion of the AWPE, with some administrators asserting that the exam has long worked effectively and fairly to place students into appropriate writing courses, and others arguing that individual campuses would do better if they had the freedom to create their own placement mechanisms. Only one of these positions is reflected in the letter by the VPDUE.

Beyond this omission, we note that several issues raised in the VPDUE letter were either not accurate or not fully considered. First is the adamant, bolded declaration that "**A single off-the-shelf or standardized test should never be used to make important decisions about students, teachers, or curriculum**" (emphasis theirs). While this position is sound, it is important to note that the AWPE is not "off-the-shelf" or a single measure. First, it is a Senate-designed and approved instrument that is developed each year according to Senate guidelines. Second, it is one of many measures for writing placement at the University of California. These

measures include various SAT, ACT, AP and/or IB scores. Students can also fulfill the Entry-Level Requirement by taking an approved writing course prior to matriculation if they earn a C or better. For UC students, the AWPE is therefore not a single measure of writing competence but an additional *opportunity* for students to demonstrate that competence.

The declaration quoted above is problematic for additional reasons: it confuses two sources, and it neglects the larger context of both documents that it implicates. First, the quotation does not come from the link provided in the letter ("National Council of Teachers of English/Writing Program Administrators White Paper on Writing Assessment in Colleges and Universities"). This link takes readers to a 2014 position paper, "Writing Assessment: A Position Statement." The quotation itself comes from the earlier 2008 "White Paper on Writing Assessment in Colleges and Universities" (https://studylib.net/doc/11955336/ncte-wpa-white-paper-on-writing-assessment-in-colleges-an).

Further examination of the two sources above is illuminating. The declaration quoted above does not refer explicitly to placement, but to assessment more generally (assessment practices range from placement, to responding to student essays, to proficiency exams, and so on). The 2014 document that *is* linked to in the letter does not take an adamant position against timed writing placement assessments, noting that sometimes practical realities can lead us to use methods that are "reductive." When this document does remark on timed writing as a means of placement, it says only that administrators should be aware of what a particular placement mechanism might say to students about the process of writing before they begin their coursework, noting that "timed writing may suggest to students that writing always cramps one for time and that real writing is always a test." If any such misunderstandings arise from some students' encounter with the AWPE, we know that our instructors and course structures quickly address them.

Also important to address are the various questions raised by the VPDUE letter. First among them is: *What evidence demonstrates the validity of the AWPE?* We agree with the VPDUEs that the AWPE's validity should be assessed, but (as in any good assessment) we should use multiple measures to accomplish that assessment. For instance, while the first impulse might be to measure the AWPE in terms of its ability to *predict student success* in college writing, we might also measure a different kind of validity: the ability to *assess student readiness* to begin the work of college writing. The distinction between predicting success and measuring readiness is a subtle but important one. The first merely projects success; the second addresses students' needs upon entrance, a time when attention to those needs is crucial to their eventual success.

UC San Diego has for two years been surveying students regarding how they feel about their AWPE placements. That campus surveys ELWR freshmen at three points in the term: at the beginning of the term, in the second week of instruction, and again at the end of the course. While about 50% of students initially believe themselves to be misplaced in their ELWR courses, within two weeks, more than 80% declare that their AWPE placement is accurate. By the end of the term that number rises to over 90%. While this rise in numbers may be a testament to the quality of UC San Diego's ELWR courses, it also suggests that, from the students' perspectives, the AWPE has done a good job in placing students. It might be worth investigating whether or not students at other UCs feel that the AWPE has placed them accurately.

A second important question raised by the letter is: *Do different populations perform differently on the assessment and, if they do, is their differentiated performance related to factors associated with the assessment, or related to something else?* The VPDUE letter notes that white students perform better on the AWPE than students of color, adding that these disparate performances are far greater on the AWPE than they are for other standardized exams. They also note that domestic white students perform far better than international students. Such data are important and should not be ignored. However, in presenting these facts, an important part of the question is neglected: Are these differentiated performances *related to something else?* Certainly, students entering the University of California are bringing with them significant variations in high school preparation. Among domestic students, these variations in preparation are determined by the neighborhoods in which the students live, which are too often marked by differences in race and class. A large majority of international students come to the UC system from East Asia and other countries where exposure to intensive English language environments and expert teachers is not routine. Their AWPE results might therefore be interpreted as *also* reflecting variations in high school preparation.

Because the reasons for placement outcomes are varied and complex, disparate outcomes in AWPE scores by race, though crucially important to understand, should not by themselves justify eliminating the AWPE. The AWPE is the messenger, not the cause. To ignore its results would be to undermine the academic preparation of the very students the VPDUE letter identifies. It would hurt the University of California's ability to help all students of all races and classes meet UC expectations.

We might also take a closer look at the VPDUE's suggestion that *High school grades are actually a much better predictor of success in a college writing class than tests like the AWPE.* We are not convinced that high school grades are in fact useful in determining a student's writing abilities. We know that grade inflation in high schools is rampant. Data released by the College Board indicates that 47% of all high school graduates have GPAs of A or A+. Complicating the matter further is that students accepted to the University of California present a very compressed range of grades. A UC placement system based on high-school grades would not be accurate. It would not meaningfully differentiate, and so would not function as a placement system. As a colleague from Berkeley points out, given that high school writing instruction is still largely focused on teaching the five-paragraph theme (a form of writing not transferable to college writing), how predictive would high school grades be?

Finally, we would like to note that we appreciate the VPDUE's acknowledgement that writing experts should be included in any discussion regarding writing placement and writing instruction. We also appreciate their confidence that experts are better prepared to determine what kind of writing placement should be implemented at individual campuses. However, as noted earlier, UC writing experts are not in agreement regarding the AWPE. Moreover, it does not necessarily follow that all individual UC campuses will be persuaded to listen to the advice of local experts when it comes to implementing new placement practices. In the absence of well-informed Senate backing of Systemwide placement standards, UC writing programs and their standards for placement and proficiency become dangerously vulnerable to the budgetary priorities of campus administrators. We should be aware that the national decline of

<u>administrative support for writing programs in higher education has proceeded by means of a broad attack on placement procedures</u>.

   To develop a reliable and effective placement mechanism requires considerable amounts of time and resources. The institutional strength of the AWPE has developed over three decades of testing, deliberation, and innovation, with Senate supervision, timely statewide testing at over a hundred sites, and placement resources provided equally to all UC campuses for summer testing. Those administering the AWPE go to great lengths to thoroughly vet the exams. They recruit and compensate experienced readers from across the state. They make sure that these readers are consistently normed and supervised. This infrastructure would disappear if the AWPE were eliminated, leaving each campus not only with the challenge of designing, implementing, and assessing a reliable placement process, but also with the challenge of finding the resources to implement it. Students' ability to enroll in the right course in a timely manner would be compromised, affecting their preparation for other courses and quite possibly their time-to-graduation.

   UCOPE stimulated the creation of the AWPE in the 1980s in order to make assessment more consistent across the campuses. and to ensure that writing placement in the UC system was in accord with Senate expectations. While we of course support regular review of this assessment tool, we remain firm in our belief that these founding principles continue to be vital to the University of California's education of undergraduate students.

Sincerely,

John Briggs, Director. University Writing Program, UCR
Wallace Cleaves, ELWR Associate Director, University Writing Program, UCR
Paul Beehler, English 1ABC Associate Director, University Writing Program, UCR
Ray Papica, WAC Associate Director, University Writing Program, UCR
Karen Gocsik, Director, Analytical Writing Program, UCSD
Holly Bauer, Associate Director and Placement Coordinator, Merritt Writing Program, UCSD
Carrie Wastal, Director, Muir College Writing Program, UCSD
Stephen Cox, Director, Humanities Program, UCSD
Phoebe Bronstein, Director, Culture, Art and Technology Program, UCSD
Leigh Harris, Director, UCLA Writing Programs
Janet Goodwin, Associate Director, UCLA Writing Programs
Greg Rubinson, Placement Director, UCLA Writing Programs
Janet Goodwin, Associate Director, UCLA Writing Programs
Christine Holten, Director, UCLA Undergraduate Writing Center
Maggie Sokolik, Director, UCB College Writing Programs
Jonathan Lang, UCB College Writing Programs; Chair, AWPE Committee
Paul Gibbons, Interim Director, Merritt Writing Program, UCM

January 21, 2020

TO: Professor Kum-Kum Bhavnani, Chair, UC Academic Senate
    Cc: Mary Gauvain, Vice Chair, UC Academic Senate
       Darlene Francis, Chair, UCOPE
       Jeffrey Gagnon, Vice-Chair, UCOPE
       Eddie Comeaux, Chair, BOARS
       Madeleine Sorapure, Vice-Chair, BOARS
      Brenda Abrams, Principal Policy Analyst

FROM: Writing Researchers and Program Administrators at UCD, UCI, and UCSB

RE: Response to VPDUEs' and AWPE coordinators' letters regarding the AWPE and ELWR

Dear Professor Bhavnani, Academic Senate, UCOPE, and BOARS leadership:

We (writing studies scholars at several UC campuses) are writing to share our perspective on two letters that were sent to UCOPE in spring 2019 regarding the AWPE and the ELWR. One, sent in April 2019 by eight Vice Provosts and Deans for Undergraduate Education (hereafter VPDUEs), we had seen before. The other, sent in May and signed by writing program administrators (hereafter AWPE coordinators) and other interested parties from five UC campuses, had not been shared with us until recently. We were surprised and disappointed to hear that this letter had gone forward without our input and knowledge, as discussions regarding the AWPE and ELWR affect all of us in the UC, not just some of us.

It is interesting to us *who* was not consulted in the drafting of the AWPE coordinators' letter. Some of the most respected writing studies scholars in the U.S. work at UC campuses. They include editors of major journals, chairs of flagship conferences, leaders of professional associations, and accomplished researchers and authors in the field. Importantly, because our writing programs include faculty of all ranks (ladder, SOE, and non-Senate lecturer), it is important to note that UC writing faculty (of all ranks) have been long involved in discussions about the AWPE and have conducted research into placement exams more broadly. They have also sought to foster and participate in discussion among all writing program faculty about these issues, e.g., at UC-wide writing program meetings. We raise this point because we do not see evidence of current research in some of the arguments raised in the third letter.

Our Views on the AWPE

We agree with the points raised by the VPDUEs. The AWPE has existed in its current form since the mid-1980s (see Stanley, 2010, for a history of writing assessment in California higher education). Neither the placement process nor the instrument itself represent current thinking on

best practices in writing assessment and placement.[1] Many other comparable institutions to the UC have moved toward modern methods of placement, and our colleagues in the California State University system left their exam, which was similar to the AWPE, behind several years ago (see Melzer, 2015). The VPDUEs' argument that it is time (arguably well beyond time) for the UC system to take a critical look at this high-stakes and *very* expensive exam seems well-taken and reasonable to us. Here are several concerns that we as writing studies researchers have with the AWPE and the larger placement process.

Using a one-shot timed writing exam as a sole determinant of proficiency was discredited long ago in writing studies research. In the AWPE, students must write by hand in a bluebook, under time pressure, on a text and topic they may have not seen or thought about before. This does not duplicate any real-world educational experience in high school or college classes. (See work on writing assessment validity by scholars like Huot, 1994,1996, 2002, etc.; Lynne, 2004; and White et al, 1996.) Even when students must take in-class writing exams in college courses, they are always focused on course content that they have been studying and discussing, not topics they have to address "cold." The AWPE is an "inauthentic" college writing task, i.e., it does not measure anything except a student's ability to quickly figure out that kind of test. It does not accurately capture the range of things students can do under more user-friendly and authentic circumstances. In fact, the AWPE actually undermines the instruction we provide students in first-year composition courses in the UC, as it reinforces students' habits of writing a single draft, in contrast to the rigorous drafting and revising processes we teach in first-year writing. (See the Council of Writing Program Administrator's First-Year Outcomes Statement that recommends national outcomes for college-level first-year writing courses.)

The VPDUEs' letter notes that the literature on writing assessment calls for multiple measures--not a single, timed test--to assess student proficiency, and thus that the sole reliance on AWPE scores is an inadequate approach for evaluating entry-level writing competency (see the Conference on College Composition and Communication's Writing Assessment Position Statement). The AWPE coordinators' response to this point is that there are alternatives such as SAT, ACT, AP, or IB scores by which students can satisfy the ELWR. (These are alternatives, it should be noted, that are not equally available to all incoming UC students. Further, as reported in the LA Times in November, 2019, some UC Chancellors argue that the SAT should be dropped and ACT should be dropped as UC admissions requirements because they act as "an unfair barrier to college entry for underserved students." In any event, the term "multiple measures" in writing assessment research literature does not mean "the student has a choice of tests to take." It means that several different complementary pieces of data are used to assess the student's current competencies.

The AWPE disadvantages students of color and those who are linguistically and culturally diverse. AWPE data clearly show much higher pass rates for domestic white

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[1] See literature that recounts the development of modern writing assessment theory and practice in our Resources list, included at the end of this letter.

students than for students of color and international students. However, the AWPE coordinators' response to this point is to say that because the test reliably produces this result, the result is reliable. However, tests must also be valid and fair (see "Standards for Educational and Psychological Testing," 2015).

The basic structure of the AWPE--the testing mechanism and its rubric--have been in the same form for decades. However, there has been no systematic documentation and analysis of reliability statistics over the course of the history of exam, despite persistent requests from Senate faculty serving on UCOPE. If in fact reliability establishes the upper limits of validity, then the AWPE's reliability is at best obscured and its validity not theorized. Without the basic elements of data analysis in place that would be expected of any placement mechanism of this sort, it remains something of a mystery how a test whose reliability & validity have not been systematically studied or documented can define the values that comprise the entry-level gateway of one of the world's premier public university systems.

If a placement exam is consistently showing results that skew heavily against diverse students, many of whom are also first-generation college students, it is important to conduct a validity inquiry that seeks to understand whether the instrument itself creates bias (see the work of Poe, Inoue, and Elliot as well as Kane). On this point, we also agree with the VPDUEs.

As to international and other multilingual students in particular, a timed-writing assessment immediately places them at a competitive disadvantage. It is not only common sense that it is much harder to write a timed writing exam in a second language than in a first language, but this also has been well established by research on second language writing assessment going back decades (see, e.g., Crusan, 2010; Ferris & Hedgcock, 2014; Hamp-Lyons, 1991; Kroll,1990).

Beyond the time factor, the linguistic and cultural knowledge required by the AWPE source texts and prompts is problematic (see the [Conference on College Composition and Communication's Second Language Writing Position Statement)](). Some of the source texts--the texts students had to read and write about on the spot--have been determined by research-informed text analyzers to be at readability levels several years beyond 12th grade (i.e., when students take the AWPE). They also included vocabulary that was idiomatic and culturally marked and might not be equally accessible to students from diverse backgrounds. Further, the prompts/tasks themselves ask for an abstract or philosophical response to a text--again, completely "cold" and under time pressure--a type of reading and writing task that they may not have been exposed to under a different educational system. In short, in the AWPE, the deck is stacked against diverse students on a number of levels. The "messenger" (the test) is writing the "message" ("deficient," "not proficient," "not ready," etc.)--but what is the test itself actually measuring or predicting?

The AWPE is an expensive and inefficient way to handle placement across the UC system. The UC invests a considerable sum in the AWPE -- developing and administering the exam, disseminating results, and so on. It is certainly the UC's responsibility to support campuses and faculty to implement best practices for student assessment and placement, and

to support ELWR courses that ensure that all students have appropriate courses to develop as writers. But it is worth investigating whether alternative, research-informed methods of placement might not only be fairer and more reliable but also a more efficient use of systemwide and campus resources.

Curriculum and placement decisions should go hand in hand, but the AWPE is used as a one-size-fits-all instrument. The AWPE is meant to be binary--pass or fail, ELWR-satisfied or not. For local campus programs that offer students multiple curricular options (e.g., stretch courses or co-courses, in addition to stand-alone single courses) to satisfy the ELWR, it will not provide the precision and information needed to make good placement decisions. UC campus writing programs are different from one another and thus need flexibility to design placement processes that suit local contexts.

We do not doubt, for example, the report from ELWR administrators at UCSD, mentioned in the AWPE coordinators' letter, that their students are satisfied with the ELWR courses they have taken. These data do not, however, measure anything about the AWPE in particular--just that UCSD runs a good course that students value. One could speculate, and probably accurately, that the students would have had (at least) an equally positive experience if the process that had placed the students into the ELWR course at UCSD had been different.

Unquestioned use of the AWPE undermines the aims of the Entry-Level Writing Requirement itself. The ELWR ensures that UC fulfills its responsibility to ensure that all students have a shared foundation for literacy instruction. Such a foundation, in fact, contributes to UC's efforts to address structural inequities. We absolutely concur that it is critical that UC continue to meet this responsibility. However, since the AWPE is one of the gateway measures to this course, we believe that it is also critical that we examine how this gateway is functioning. Doing so is consistent with the UC's commitment to providing just, equitable, and responsible instruction. Such an examination does not undermine the ELWR requirement; in fact, it strengthens it.

Summary/Recommendations

We do agree with the AWPE coordinators on two points: (1) In a large, diverse public university system, students will arrive with differing levels of preparation and experience. Thus, an Entry-Level Writing Requirement, and a range of ways to fulfill it, is an appropriate and important mechanism to support the success of incoming UC students and create equity. (2) There needs to be some kind of placement mechanism to guide students toward the right option(s) for completing the ELWR. However, in agreement with the VPDUEs, we question whether the AWPE continues to be the best or most appropriate placement instrument.

In summary, we would respectfully suggest that the UC Academic Senate and UCOPE consider these next steps:

1. The UC/UCOPE should carefully study both the appropriateness and cost-effectiveness of the AWPE. All WPAs should be open-minded about examining what they do to assess whether it remains the best possible approach given advancing knowledge and changing student populations.
2. Successful placement models from other U.S. university systems should also be considered by way of comparison.
3. Specific attention should be given to ensuring that placement processes are fair to diverse students.
4. To evaluate these issues, the UC/UCOPE should consult with writing assessment experts, both inside and outside of California. The UC-WPAs note in their letter that "experts" within UC writing programs disagree about the value of the AWPE, but how do they define "expertise"? We would argue that writing studies researchers with specific credentials (i.e., research and publication) in assessment and especially placement should guide the process and be the primary consultants to UCOPE.
5. UCOPE should consider disseminating all relevant research reports done by institutional research at UCOP to all current WPAs from across the system. We are aware of recent assessments of the AWPE and also past research reports that should be used to inform discussions about the AWPE going forward.

We are happy to help this effort in any way, and we thank UCOPE for the opportunity to provide our perspective alongside the one already sent by the WPAs from several other UCs.

Respectfully,

Linda Adler-Kassner, Professor of Writing Studies, Faculty Director, Center for Innovative Teaching, Research, and Learning, and Associate Dean, Undergraduate Education; formerly Director of the Writing Program, UC Santa Barbara

Jonathan Alexander, Chancellor's Professor of English and Associate Dean of Undergraduate Education, and formerly Campus Writing Coordinator and Founding Director of the UCI Center for Excellence in Writing & Communication, UC Irvine

Rebekka Andersen, Associate Professor and Associate Director for Professional Writing, University Writing Program (UWP) at UC Davis

Charles Bazerman, Distinguished Professor of Education, Gevirtz Graduate School of Education, UC Santa Barbara

Kory Lawson Ching, Assistant Professor and Associate Director for Online Writing Instruction, UWP at UC Davis

Dana Ferris, Professor and Director, UWP at UC Davis; Editor, *Journal of Second Language Writing*

Karen J Lunsford, Associate Professor of Writing, Director of the PhD Emphasis in Writing Studies, Writing Program, UC Santa Barbara

Dan Melzer, Associate Professor and Associate Director for First-Year Composition, UWP at UC Davis

Bradley Queen, Associate Professor of Teaching & Co-Director, Composition Program, UC Irvine and formerly Chair of UCOPE

Tricia Serviss, Assistant Professor and Associate Director for Entry-Level Writing, UWP at UC Davis

Carl Whithaus, Professor and Former Director, UWP at UC Davis; Editor, *Journal of Writing Assessment*

Resources

American Educational Research Association, American Psychological Association, National Council on Measurement in Education, Joint Committee on Standards for Educational and Psychological Testing (U.S.). (2014). *Standards for educational and psychological testing*. Washington, DC: AERA.

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