



# ENSURING ALL STUDENTS HAVE ACCESS TO HIGHER EDUCATION: THE ROLE OF STANDARDIZED TESTING IN THE TIME OF COVID-19 AND BEYOND GUIDANCE FOR COLLEGES AND UNIVERSITIES

NACAC Task Force  
on Standardized Admission  
Testing for International  
and US Students

NACAC

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*The task force would like to acknowledge and thank Jill Cook at the American School Counselor Association (ASCA) for reviewing the report with an eye toward matters of importance to school counselors.*



## DEAR COLLEAGUE,

Greetings, and my best wishes to you, your family, and the institution you represent in this time of extraordinary challenge.

The following report springs from the convergence of two events. First, there is the COVID-19 pandemic that has upended both institutional operations at all levels worldwide, as well as the lives of individual students preparing for higher education. This report addresses the resulting access and equity concerns for all students. Second, the report answers a call at the 2018 meeting of the NACAC Assembly to assess standardized testing challenges for students residing abroad.

This report is faithful to that original charge and explores the mismatch between the increasing role international students play in our enrollment planning and the level of services that population receives in test administration planning. But the report is also a clear-eyed assessment of implications of the pandemic on the use of standardized testing for enrollment purposes. Just as one example, the College Board reports that the number of rising seniors in the United States who have taken the SAT this year is down by more than 1 million. Multiple test administrations have, understandably, been canceled, and opportunities for students this coming fall will be determined in large part by the spread of the virus and not by the efforts of the College Board or the ACT. Even if test administrations can proceed as scheduled in all parts of the world, opportunities for students to prepare for their tests both in and out of school will likely continue to be significantly affected.

Yet the SAT and ACT are deeply embedded in the enrollment operations of most American higher education institutions. Score usage can range from searching for prospective students, to guiding the selection process, allocating financial aid and scholarship funds, and forecasting yield and retention. Student test scores are even used by third parties to rate our institutional quality and our creditworthiness.

The availability of that resource most of us use and some of us depend on—student test scores we don't have to pay for—has been severely disrupted. Clearly, this is a crisis year. This is a year to be as economical as possible in uses of standardized testing. It is a year to reexamine any mandatory use of testing as part of enrollment operations, for both practical but also ethical reasons. It is a year to be reminded of appropriate uses, and potential misuses, of standardized tests, as NACAC did in its excellent 2008 report. It is a year to partner with the College Board and the ACT on test administration and fairness for students and secondary schools the world over. We explore all these issues in this report.

I thank you for considering the recommendations of this task force. Our work has been guided by the interests of students, and the hope that this period of crisis will not become a long-term drag on student educational opportunities. I also thank task force members, and NACAC staff and leadership, for their work in tackling these important issues.

Sincerely,



**John Latting**

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## EXECUTIVE SUMMARY

The National Association for College Admission Counseling's *Task Force on Standardized Admission Testing for International and US Students* was charged by the NACAC board of directors with investigating access to testing, alternatives for assessment, customer service and communication with testing stakeholders, barriers for students needing accommodations, and availability of fee waivers for the ACT and SAT college admission exams. This task force was created after several years of disruptions to international test administrations and disadvantages faced by test-takers outside the US, for which other efforts to enact change resulted in limited responses from the testing organizations, minimal awareness by higher education institutions of the challenges students faced, and the recurrence of the same issues on an annual basis.

NACAC remains respectful of the complexities involved with administering a test internationally to a growing population of test-takers, particularly as the unprecedented rate of technological change presents additional challenges. However, recent experience suggests that the expansion of the student population and rapid changes in technology may have outpaced the capabilities of the testing agencies, causing significant disruptions for students who test outside of the United States. As such, the task force set out in Fall 2019 to carefully examine the systemic challenges involved with standardized admission testing in an increasingly global landscape. The task force, however, had to pivot in early 2020 as the COVID-19 pandemic swept the world and affected every facet of life, including the college admission process. The task force felt a responsibility to its original charge, while also altering the scope of its work to include testing issues and policy changes that were exacerbated by the COVID-19 disruptions.

Through the initial as well as expanded charge, task force members insisted that access and equity be the lens through which they approached their work. As the gatekeepers of access, the policies and practices of admission offices are paramount to achieving a fair and equitable process. As a prominent feature of many admission policies, college admission exams stand out for

their visibility and, arguably, their outsized importance, which has prompted a decades-long debate over the question, "What are the ways in which college admission exams contribute to or detract from postsecondary access and success for a diverse set of students?" This task force examined this question closely.

**The task force observed that if standardized testing perpetuates or worsens inequities, and if it is to remain a part of the undergraduate admission process at all, it must receive the most stringent of reviews.**

College admission counseling professionals must examine their policies and practices to offer tangible solutions that can help bring about needed change. This report suggests steps that institutions can take related to standardized admission testing. These steps cannot alone resolve issues of access and equity in admission, but deserve careful consideration.

Among these are:

- Considering the impact of every requirement that institutions place on students in the admission process.
- Committing to regular predictive validity research of standardized testing and to publicly sharing results.
- Reexamining the infrastructure used for standardized testing.
- Considering the impact of score policies on the student experience, which may incentivize students to take standardized tests more than once.
- Clearly articulating to whom testing policies apply and, if not to all applicants, the rationale for excluding certain populations.
- Sharing outcomes data, disaggregated by key demographic variables (e.g., race, ethnicity, socioeconomic status, financial aid, and high school type).

Colleges and universities are undergoing, and will continue to undergo, introspection as to whether they will continue to require standardized tests as admission criteria. The task force strongly believed that it is up to institutions to determine whether admission tests add sufficient

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value to the admission process to justify the social and monetary costs, which are outlined in this report. The task force respects that institutions will arrive at different decisions about the usefulness of standardized tests in their admission processes.

**To assist institutions in these discussions, the task force recommends key considerations that should be addressed when making the decision.**

**Decisions should:**

- **Consider the public good.** Consider what admission policy decisions mean for higher education generally, and whether institutional policies and practices enable more students access to higher education.
- **Be student-centered.** Offer simplicity and clarity in a time of complexity and heightened anxiety about the college admission process. Though the COVID-19 pandemic created additional barriers to accessing standardized tests, certain populations—including international applicants, who are critical to postsecondary institutions—have faced barriers for decades that will remain, or even be exacerbated, if or when testing returns to pre-COVID-19 operations.
- **Focus on student success.** Review historical institutional data for enrolled students to determine the factors that contribute to student success.
- **Be transparent and clearly stated.** Share data that has informed decisions, clearly articulate the resulting

decisions and justifications, and share data that results from policy changes or continuations. Avoid ambiguous language.

- **Include a plan for conducting frequent reviews.** Commit to regular assessment of institutional data to inform testing policy.
- **Consider unintended consequences.** Standardized tests have served a role in the evaluation process to assess cognitive characteristics of students independently of any particular secondary school curriculum. External assessments can be thought of as a counterweight to information from secondary schools that have an interest in the outcome of the selection process. When colleges and universities no longer utilize SAT or ACT scores, and other measures of academic achievement become more important in determining who is admitted, does this place new pressures on secondary schools?

Through this report, the testing task force aims to empower senior higher education leaders to make informed decisions regarding standardized admission testing policy and practice, while considering the impact of these decisions on the public good. The task force also intends this report to be a catalyst for discussion among all stakeholders involved in college admission testing, and to illustrate systemic challenges for those most directly affected, including students and counselors. This report provides background information, key questions, and calls to action—related to both systemic concerns and new developments—to inform conversations and decisions around standardized testing. ■

## BACKGROUND ON THE TASK FORCE

Standardized testing and its use in admission has been a topic of focus and advocacy for the National Association for College Admission Counseling (NACAC) for decades. NACAC's members—representing secondary and postsecondary perspectives—have long-standing and varied views about its benefits and drawbacks as a factor in the admission process.

In 2008, NACAC's [Commission on the Use of Standardized Tests in Undergraduate Admission](#) explored the proper role for the SAT and ACT and established a set of recommendations aimed at stimulating a rich and sustained process of introspection about how colleges and universities evaluate applicants for admission. At that time, standardized tests were becoming an increasingly important factor in undergraduate admission, while also being used for purposes like bond ratings for institutions, college rankings, and assessments of curricular learning as high school exit exams—purposes for which they were not developed. As such, it was critical that this examination take place. With the understanding that one size did not fit all, the commission made recommendations that encouraged institutions to prioritize education about, training on, and implementation of practices that accounted for differential access to preparation and information about testing, the possible misuses of test scores, and the appropriate use of test scores with attention to differences among different groups of people. There was an overarching call to action from the commission that institutions should regularly question and reassess the foundations and implications of standardized test requirements.

These recommendations still hold merit a decade later. However, the world—and thus college and university admission—has changed dramatically since the 2008 commission issued its report. Two such changes—technology and global student mobility—have had significant impacts on standardized testing. The 2010s, the “[Decade of Disruption](#),” saw mobile upgraded from 3G to 4G, while the amount of time spent online worldwide quadrupled largely due to social media and faster network connections

facilitated the rapid transfer of data over the internet. These technological changes took place as more students pursued education outside of their country of origin and were likely a factor in accelerating this mobility. Between 2011 and 2017, the [number of internationally mobile students grew from approximately 3.9 million to 4.8 million](#). This increase in volume has undeniably strained the capacity of postsecondary institutions to recruit, evaluate, and accommodate students from regions far and wide. Funneling the global student population through domestic admission processes has proven difficult in nearly all aspects, including standardized admission testing. NACAC remains respectful of the complexities involved with administering a test internationally to a growing population of test-takers and acknowledges the additional challenges presented by the unprecedented rate of technological change. However, recent experience suggests the expansion of the student population and rapid changes in technology may have outpaced the capabilities of the testing agencies, causing significant disruptions for students who test outside of the United States.

Between 2015 and 2018, NACAC members working with international test-takers reported [widespread problems with test administration in overseas locations](#). During this period, NACAC issued three public letters (Appendix A) to the testing agencies asking for assistance in resolving these problems. By 2018–19, concerns voiced by counselors and others increasingly began to focus on the cumulative effects on equity and access for international students and US citizens testing abroad, as outlined in a [May 2019 report by the International Association for College Admission Counseling \(International ACAC\), a NACAC affiliate](#). The *Task Force on Standardized Admission Testing for International and US Students* was created by the NACAC board of directors in 2019 in response to a motion passed during the 2018 NACAC Assembly (Appendix B). The task force was charged with investigating access to testing, alternatives for assessment, customer service and communication with testing stakeholders, barriers for students needing accommodations, and availability of fee waivers for the ACT and SAT college admission exams. The task force membership represented US and international secondary

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and postsecondary institutions as well as independent educational consultants. The American School Counselor Association, a membership organization of professional school counselors, reviewed the report to ensure the task force findings reflected the views of this segment of NACAC's membership.

In the fall of 2019, the task force set out to carefully examine the systemic challenges involved with standardized admission testing in an increasingly global landscape. In addition to reviewing the International ACAC report, the task force solicited feedback from the NACAC membership in February 2020 (Appendix C). The analysis confirmed for the task force that association members were concerned with access to testing outside of the US, fairness and equity for international test-takers, and communication challenges with testing agencies. The task force, since its inception, has been in communication with the College Board and ACT, and requested data from the agencies to inform the task force's understanding and recommendations (Appendix D). The task force, as well as the testing agencies, had to pivot in early 2020, however, as the COVID-19 pandemic swept the world and affected every facet of life, including the college admission process. The task force felt a responsibility to its original charge, while also altering the scope of its work to include testing issues and policy changes that were exacerbated by the COVID-19 disruptions.

Through this report, the testing task force aims to empower senior higher education leaders to make informed decisions regarding standardized admission testing policy and practice, while considering the impact of these decisions on the public good. The task force also intends this report to be a catalyst for discussion among all stakeholders involved in college admission testing,

and to illustrate systemic challenges for those most directly affected, including students and counselors. This report provides background information, key questions, and calls to action—related to both systemic concerns and new developments—to inform conversations and decisions around standardized testing. Though the task force focused on the SAT and ACT, the report identifies themes—educational inequities, access to test preparation, the digital divide, and more—that affect any standardized assessment, particularly for purposes of evaluating admissibility to college.

### **About NACAC**

NACAC, founded in 1937, is an organization of nearly 14,000 professionals from around the world dedicated to serving students as they make choices about pursuing postsecondary education.

NACAC strives to provide the counseling and admission profession with knowledge, research, and tools to ensure that all students have access to higher education. Toward this strategic goal, NACAC has long advocated for policies that address inequities. Specifically, that inequitable distributions of resources among school districts in the United States limits access to college preparatory coursework; that inequitable access to school counselors limits access to college guidance and preparation, including how to best prepare for tests; and, that vast inequities in wealth limit students' ability to afford college, including the standardized tests and the test preparation services that many students and families see as a necessary step in the admission process. Furthermore, NACAC advocates to ensure the ethical practice and fair treatment of all students, including international students, and promotes student mobility. Differential and restricted access to standardized tests threatens these core values. ■

## INTRODUCTION: STANDARDIZED ADMISSION TESTING IN 2020

The COVID-19 pandemic has called into question the college admission practices and policies higher education institutions have maintained for decades, one of which is the reliance on the ACT and College Board to provide valid and reliable external assessments of millions of students worldwide. In the US alone, [more than 2 million students from the class of 2019 cohort](#) took the SAT and [nearly 1.8 million took the ACT](#), with the majority of test-takers aspiring to some form of postsecondary education.

School and testing center closures, as a result of the pandemic, have caused significant disruption to students around the world who seek to enter higher education in the coming years. According to [UNESCO](#), at the peak of the pandemic in mid-April, 194 countries had implemented nationwide school closures, affecting close to 1.6 billion students—90.1 percent of the world’s total enrolled learners. These closures [derailed the testing process in the spring](#), and likely will continue to disrupt the ability of hundreds of thousands of students to test over the summer and fall as uncertainty remains over reopening. By the end of May, roughly 1 million fewer American 11th-graders had taken the SAT for the first time than would have been expected.

These disruptions have forced many postsecondary institutions to make changes to their testing policies, as access to testing cannot be guaranteed for students and maintaining enrollment is critical for institutions. Moreover, institutions recognize the clear threat to fairness, equity, and access posed by maintaining testing requirements during the COVID-19 pandemic. As of the writing of this report, [more than half of four-year colleges and universities had gone test-optional](#), 318 of which—including many highly selective public and private institutions—made announcements in spring or summer 2020. Though test-optional adopters were growing prior to the emergence of COVID-19, the pandemic quickly accelerated the movement. For comparison, approximately 50 institutions announced a test-optional policy throughout the entire year in 2019.

[Among the institutions that made decisions this spring or summer](#), at the time this report was finalized, 80 were permanent policy changes, 25 specified a two- or three-year pilot program, and 213 were specific to the class of 2021, prompting questions as to what testing will look like over the next few years, and which institutions will decide to remain test-optional for the long-term.

### Understanding “Test-Optional”

“Test-optional” is a blanket term to describe an institutional policy around not requiring standardized exams, or a specific exam. In practice, “test-optional” typically refers to institutions that give students the choice to submit scores if they feel it reflects their true ability. Institutions will still consider scores if submitted. “Test-flexible” refers to institutions that give students a choice about which type of assessment to submit. “Test-blind” refers to institutions that will not consider standardized testing for any applicant, even if submitted.

As a result of the pandemic, higher education institutions have an opportunity to come together to reflect on current or recently changed testing practices, to review testing in light of other measures to predict successful student outcomes, and to realign admission requirements to ensure a student-first framework. NACAC’s [Code of Ethics and Professional Practices](#) states:

*Our profession strives to ensure that the students we serve and all of our colleagues are valued and supported. We thrive by embracing and engaging our unique identities, experiences, and perspectives, and we are committed to increasing the enrollment and success of historically underrepresented populations. We are dedicated to promoting college access and addressing systemic inequities to ensure that college campuses reflect our society’s many cultures, stimulate the exchange of ideas, value differences, and prepare our students to become global citizens and leaders.*



**As the gatekeepers of access, the policies and practices of admission offices are paramount to achieving a fair and equitable process.... As a prominent feature of many admission policies, college admission exams stand out for their visibility and, arguably, their outsized importance, which has prompted a decades-long debate over the question, “What are the ways in which college admission exams contribute to or detract from postsecondary access and success for a diverse set of students?”**

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In addition to highlighting the causes and manifestations of disparities that students face, college admission counseling professionals must also examine their policies and practices to offer tangible solutions that can help bring about needed change. This report suggests steps that institutions can take related to standardized admission testing, which cannot alone resolve issues of access and equity in admission but deserve careful consideration. ■

## **ACCESS AND EQUITY CONCERNS IN STANDARDIZED TESTING**

The higher education sector must create an environment whereby all students, regardless of race, ethnicity, country of origin, or country of residence, are provided with equal access to educational opportunity. Higher education institutions have strategized for decades to create equitable admission practices, which is necessary for higher education to remain of service to the greater good. US institutions have enacted strategies, for example, that include race-conscious admission practices, consideration of students’ socioeconomic circumstances, or targeted recruiting. Several states have limited the ability of admission offices to consider a student’s race or ethnicity as a factor affecting their access to educational opportunity, while some have enacted laws requiring public institutions to accept the top “X” percent of students from public high schools. One important element links both sides of this often-contentious debate—that access to postsecondary opportunities is not evenly distributed, equitable, or, in a broad sense, fair.

As the gatekeepers of access, the policies and practices of admission offices are paramount to achieving a fair and equitable process. Indeed, these policies and practices are the subject of regular discussion, critique, and assessment, both internally and externally, each year. As a prominent feature of many admission policies, college admission exams stand out for their visibility and, arguably, their outsized importance, which has prompted a decades-long debate over the question, “What are the ways in which college admission exams contribute to or detract from postsecondary access and success for a diverse set of students?”

The relationship between colleges and universities, on the one hand, and the SAT and ACT admission exams, on the other, is symbiotic. The development of standardized admission tests was a direct response on the part of postsecondary institutions to the desire for a “common yardstick,” and to a great extent, a way to create efficiency in the process of reviewing applications for admission. Over time, the tests have adapted in response to stimuli from the market—[enrollment has grown more than 1,500 percent](#) since the SAT was developed in 1926—and to critical thinking about how (or whether) students’ abilities, and later learning, can be assessed in a single sitting. Postsecondary institutions have effectively entrusted the College Board and ACT with the authority of serving as a third-party certifier of students’ qualification for admission. As the population interested in admission to college has rapidly expanded and diversified, however, testing agencies have not been able to ensure that the access to and availability of test administrations, the quality of the testing experience, and the integrity and validity of test scores are preserved consistently. Moreover, “test prep”—at first scorned by the testing agencies

and now embraced—has burgeoned into a billion-dollar industry, creating added equity challenges and calling into question the reliability of test scores as true measures of student abilities.

International test-takers, particularly, have for years faced significant barriers to access, creating an inequitable testing environment compared to test-takers within the United States—the original impetus for this task force. Advocates for international test-takers have expressed disapproval over fewer test dates, greater distances traveled to a limited number of testing locations, higher fees, differing policies (e.g., fee waivers), and alternative testing formats that disadvantage students. Specialized technology requirements for the ACT have reduced the ability of some secondary schools to remain as testing sites. After years of expressing their concerns, professionals working with international students have been frustrated by limited responses from the testing organizations, minimal awareness of their challenges by higher education institutions, and the recurrence of the same issues on an annual basis.

Now, as a result of disruptions to testing in the United States, the spotlight on testing is being driven by domestic student voices and their advocates, which has brought the issues previously limited to the international student realm into the forefront of public consciousness. Significant testing disruptions resulted globally from COVID-19—spring and summer tests were canceled, seats are and will continue to be limited as testing sites are allowed to open, discussions about alternative formats for test administration accelerated, students have limited access to guidance on test taking, and test preparation is delivered in alternative formats. Though some rising seniors were able to test in their junior year, retesting, which around half of test-takers will do ([54 percent for SAT and 45 percent for ACT](#)), will be restricted, therefore limiting the opportunity for students to demonstrate improvements or create stronger scores for those institutions that superscore. It is also well-established that from an access and equity perspective, limited testing and retesting capacity will disparately affect students who are underrepresented, low-income, first-generation, or live in densely populated areas.

Recent concerns further complicate long-standing questions about college admission exams, including but not limited to:

- How do we account for differences in scores by race/ethnicity and income?
- Do the exams simply magnify existing disparities already ingrained in our K-12 educational system?
- Do the exams provide sufficient additional predictive power for postsecondary success, particularly for underrepresented students? Does it vary by academic pathway and type of higher education institution?
- Does inequitable access to test preparation further reinforce systemic inequities and further amplify test score differences?
- Are the exams culturally tilted away from underrepresented students in their very construction?

Over time, an increasing number of postsecondary institutions have implemented test-optional admission policies, citing concerns about equity among the reasons for doing so. The task force stresses that with these, and other policies intended to address equity concerns, results are what matter, not simply implementing policies. Though [several research studies](#) have shown that test-optional policies do not improve institutional diversity, these studies have significant limitations including focusing on highly selective liberal arts colleges—the early adopters of test-optional policies. As the types of institutions that go test-optional broadens, and as test-blind policies are adopted, more research is needed to show the effects on institutional diversity. And importantly, a large percentage of students still opt to submit standardized test scores to test-optional institutions. Applying to other schools that require exams, needing exams to apply for certain academic or scholarship programs, or unfortunately, mistrust that they won't be treated fairly in the review process without scores play a large role in the decision to submit. As such, it is critical not to abandon efforts to address concerns about equity and access to the tests for students who are required to or opt to submit test scores. Institutions must

commit to showing evidence to the public that they are making good on this renewed commitment to students that higher education can be an engine of opportunity and social mobility for all.

After we emerge from the COVID-19 pandemic and related restrictions, we cannot simply “go back to normal.” The tenuous grasp we hold on many of our habits and policies has been further loosened, and we must adapt if we are to continue to fulfill our duty to the public good. While more higher education institutions will undoubtedly adopt test-optional admission policies, not all institutions will do so. And while some institutions have decided to go test-optional as a result of COVID-19 disruptions, this may be a temporary shift in policy. The task force believes institutions, regardless of the college admission policy they choose, must closely examine their approach in light of equity concerns. ■

## THE VALUE AND COSTS OF STANDARDIZED TESTS TO ASSESS THE 21ST CENTURY LEARNER

Twenty-first century learning as defined by the 4Cs—communication, collaboration, critical thinking, and creativity—are among the skills that college admission offices seek in applicants. The task force considered how the current standardized admission tests—one-day, multiple choice, largely paper-based exams—demonstrate the 21st century competencies that colleges expect and students need for the world into which they will graduate. For example, college and career success is now highly dependent on technological capabilities, such as the ability to search, find, and evaluate information on the web; web-style reading skills; synchronous and asynchronous communication skills; and the ability to

FIGURE 1. PERCENTAGE OF COLLEGES ATTRIBUTING DIFFERENT LEVELS OF IMPORTANCE TO FACTORS IN ADMISSION DECISIONS: FIRST-TIME FRESHMEN, FALL 2017

Factor	N	Considerable Importance	Moderate Importance	Limited Importance	No Importance
Grades in All Courses	220	74.5	15.0	5.5	5.0
Grades in College Prep Courses	220	73.2	16.8	5.9	4.1
Strength of Curriculum	219	62.1	21.9	8.7	7.3
Admission Test Scores (SAT, ACT)	221	45.7	37.1	12.2	5.0
Essay or Writing Sample	220	23.2	33.2	24.1	19.5
Student’s Demonstrated Interest	218	16.1	23.9	28.0	32.1
Counselor Recommendation	218	15.1	40.4	26.6	17.9
Teacher Recommendation	219	14.2	40.2	26.5	19.2
Class Rank	220	9.1	29.1	34.1	27.7
Extracurricular Activities	219	6.4	42.9	32.0	18.7
Portfolio	219	6.4	11.9	26.9	54.8
Subject Test Scores (AP, IB)	219	5.5	18.3	35.2	41.1
Interview	219	5.5	16.4	28.3	49.8
Work	217	4.1	28.6	36.9	30.4
State Graduation Exam Scores	218	2.3	8.7	18.8	70.2
SAT II Scores	216	1.9	5.6	14.8	77.8

SOURCE: NACAC Admission Trends Survey, 2018–19.

integrate text, images, and video into a deliverable. These are also the skills, coincidentally, that have been critical to students as they navigate virtual learning as a result of COVID-19. And, unquestionably, skills that are not assessed through the current ACT or SAT.

What might the value be of a test that measures student readiness and maintains only a modest statistical correlation with first-year success, particularly when institutions are responsible for graduating students prepared for longer-term success?

## Value to Institutions


### *Assessing Student Potential*

As originally envisioned, college admission exams were intended to provide a “common yardstick” as the population of students expanded. Moreover, early in their history, college admission exams held the promise of finding the “diamond in the rough,” or high-performing students in settings where colleges traditionally had not sought them. However, time has changed much about the founding purposes and assumptions behind these exams. Indeed, the very notions of “diamonds in the rough” and even the “common yardstick” are culturally suspect—are not all students capable of success given equal opportunity? Beyond academic capability, institutions often seek additional information about what makes a student a good fit for the institution’s mission and needs. And to what degree is a yardstick effective if the units of measurement cannot afford us a full understanding of what we’re attempting to measure?

Indeed, US colleges and universities apply a range of factors to obtain a multidimensional view of applications for admission. Colleges and universities across the board consistently indicate that high school grades in college preparatory courses are the most important factor in admission decisions (see Figure 1). This reliance on grades earned over the duration of secondary school reflects [decades of research](#) indicating that high school grades are the single strongest predictor of academic success during the first year of college and beyond. Standardized tests, however, have served a role in the evaluation process to assess

cognitive characteristics of students independently of any particular secondary school curriculum, and have generally been found to add a measure of predictive power when combined with high school grades. As high schools employ differential grading techniques and offer courses of various strengths, this external assessment has been perceived as an important tool for many institutions in comparing students across contexts. Without external assessments, colleges and universities would be making their high-stakes decisions on what is generated at the secondary school level, which could be problematic. More recently, US-based standardized admission tests are being increasingly utilized as a factor in admission for international universities ([SAT recognized at universities in 85 countries](#)), particularly for students studying in an American high school diploma program, which alone is not considered sufficient.

Institutions, through predictive validity studies, are able to determine precisely the added value of standardized test scores in admission decisions.

 **Call to Action: US and international institutions should commit to regular predictive validity research and to publicly sharing results.**

The value of ACT or SAT scores to colleges is dependent on scores conveying valid and reliable information. In the international testing context, cheating and score cancellations—the extent of which are not yet fully understood—raise important questions about the integrity of test scores. Furthermore, as one task force member notes, “the improvised fixes and stop-gap measures that testing agencies were willing to make as a result of COVID-19 have destroyed the fiction that these tests are actually standardized at all.” The testing organizations maintain a responsibility to colleges and universities to ensure that the access to and availability of the tests, the quality of the testing experience, and the integrity of test scores are preserved throughout the world.

**...institutions have come to rely on test-based student search services to play a core lead generation function in their recruitment processes, and on the other end of the funnel, have used tests administratively to aid in enrollment forecasting and onboarding related to academic advisement and placement. Such benefits are secondary to the original purpose of college admission exams, but have become intertwined in the relationship between postsecondary institutions and testing agencies.**

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### ***Administrative Tool***

Standardized admission tests also have practical implications for colleges and universities. As application numbers continue to grow and even outpace admission staff capacity in light of diminished budgets, testing offers an efficient and expedient tool to assist decision-making. The largest and most selective colleges receive tens of thousands of applications each year, reducing the review times for each application to mere minutes. In such an environment, single quantitative measures offer a tantalizing shortcut to accomplishing the unrealistic task of reading every application for admission in depth and evaluating a student's academic record and accomplishments during a lifetime of learning.

In addition, institutions have come to rely on test-based student search services to play a core lead generation function in their recruitment processes, and on the other end of the funnel, have used tests administratively to aid in enrollment forecasting and onboarding related to academic advisement and placement. Such benefits are secondary to the original purpose of college admission exams, but have become intertwined in the relationship between postsecondary institutions and testing agencies. Among other functions, the ability to identify diverse and underrepresented populations among test-takers is an oft-cited benefit of utilizing this student information.

### ***Reputation***

Colleges and universities are also mindful of public perception of institutional quality, which is inextricably linked to both test score ranges of incoming students and college rankings. *US News & World Report (USNWR)* rankings, for example, utilize student inputs—standardized testing scores and class rank—for its “[student excellence](#)”


score that comprises 10 percent of an institution's rank. College admission exam scores, therefore, remain a core perception of institutional quality for internal and external higher education stakeholders that many institutions have not been willing to risk upsetting.


Institutions make use of positive rankings and other reputational indicators when recruiting students, reporting to boards and alumni, and marketing to other external audiences. While most admission officers believe that *their* institutions are not manipulating practices to achieve better rankings, nearly all admission officers believe that *other* institutions are doing so, according to the 2011 [Report of the NACAC Ad Hoc Committee on U.S. News and World Report Rankings](#). The reality is that [all selective colleges](#), to one degree or another, factor rankings into their decision-making processes at a number of levels, including the choices they make regarding standardized testing policies.

It is important to note, however, that the *USNWR* methodology, as well as our collective perceptions about the significance of college admission exam scores on institutional quality, reflects a reality that may no longer exist—that a substantial majority of US colleges and universities require the scores for admission decisions. Though institutions that go test-optional may be signaling that rankings hold less influence than some may think, [these colleges and universities still rely on submitters](#). If fewer than 75 percent of students in an entering class submits ACT or SAT scores, *USNWR* methodology is designed to give test scores less weight, with the overall value of the school's score being reduced. *USNWR* is making adjustments to reflect a changing landscape, however, [such as now ranking test-blind institutions](#).

**In 2018–19... students testing outside of the US had four options for testing whereas domestic test-takers had seven opportunities. As one member of the task force noted, “Access is not about increasing test dates and lowering registration fees by region. It’s understanding that students applying to university don’t have the same opportunities to prepare and test and for that reason, should not be penalized for that.”**

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 **Call to Action: Call on rankings organizations to remove certain inputs, specifically class rank and standardized testing metrics, from rankings methodologies in favor of factors that measure student outcomes, satisfaction, and engagement. See the 2011 [Report of the NACAC Ad Hoc Committee on U.S. News & World Report Rankings](#).**

 **Call to Action: Determine how strongly rankings and other “reputational” considerations factor into your institution’s decision-making process regarding testing.**

### ***Value to Students***

When considering value to institutions, it’s logical to then consider the value to students. Simply put, students take standardized tests because colleges require them to do so. Like institutions, students can benefit from the opportunity to externally validate their abilities amid widely differing systems—both within the US and internationally, and even within systems with differing grading structures. Results have the possibility of opening doors for students that may not have otherwise existed, leading them to consider, for example, applying to more highly selective institutions based on their test scores. But the opposite can also be true, prompting students with lower scores that aren’t an accurate reflection of their ability to question their place in higher education. It is also important to consider cultural differences when it comes to the value of testing for students. In some cultures, where tests alone determine a student’s postsecondary path and holistic review is hard to comprehend, the test-optional movement can be anxiety-inducing.

As score disparities are often tied to money, power, and privilege, the students who most often benefit are those with money, power, and privilege. In the equation—does the value to institutions justify the cost to students—careful examination of the costs is necessary. As task force members aptly pointed out in their discussions, it’s not just costs to students, but also costs to secondary schools.

### ***Costs to Students***

Costs to students must be examined both prior to the COVID-19 pandemic and after. It is clear that many of the institutional decisions to adopt test-optional policies for at least the 2020–2021 application cycle are based in part on the judgment that the costs, both financial and otherwise, to students amid a pandemic are too high. Uncertainty about access to physical testing centers; apprehensiveness about public health; and concerns about equity in varying test scenarios, including the prospect of expanded online testing, likely drove most institutional decisions. In addition, colleges and universities recognize that stress is already heightened around a very different junior and senior year academically, cocurricularly, and with respect to the college search and application process.

Institutional decisions to go test-optional permanently, or to use this time to examine testing policies more closely during this temporary shift, most certainly included, or will include, a close examination of costs to students outside of a global health crisis. The task force sought to better understand the costs to students from an access and equity perspective.

Under the current system, the financial foundation of the administration of standardized testing rests exclusively

on students and their families. Direct costs include exam registration fees for each test administration, as well as the costs students encounter when requesting additional score reports beyond those allotted by the testing agencies.

Yet it's institutions—not students—who ultimately capitalize on the final product, using the scores submitted by applicants as a third-party certification of student qualifications. This system in itself is problematic, particularly when viewed through an equity and access lens. Financial structures that impose a flat, standardized fee for access are inherently regressive. Moreover, when the service for which individuals pay is connected to a public good, such as entry to higher education, the system by which the service sustains itself must be examined critically to determine whether access is restricted at the very source.

In recognition of barriers to access, some states and localities have begun offering free college admission exams in public schools. However, while these measures relieve individual students and families of direct costs, they ultimately transfer them to the taxpayer and consume scarce public dollars at a time when [spending on public goods, including education, has stagnated](#). And while the testing agencies offer fee waivers to low-income students, the opportunity costs of submitting additional paperwork with each administration—all to prove that a student is, in fact, disadvantaged—remains a barrier that wealthier students do not face.

Beyond direct financial costs, task force members focused on issues that are less evident and harder to quantify, yet are of considerable importance to consideration of equity and access. Per the original charge, the task force sought to understand additional, different, and significantly higher costs to test-takers outside of the United States, and were asked to examine how issues of access and equity in testing compared inside the US versus outside of the US. The task force concluded that the issues are similar, but of different magnitude. At the most basic level, fees for testing internationally are much higher than those charged domestically, and do not include ancillary but necessary costs, such as travel expenses. For example, in the US, students (particularly rural students) might have to travel some distance to test, but that trip usually does

not require a flight or a passport. The same can't be said for many international test-takers.

Additionally, there have traditionally been fewer test dates offered to students residing outside the US, particularly for the SAT. In 2018–19, for example, students testing outside of the US had four options for testing whereas domestic test-takers had seven opportunities. As one member of the task force noted, “Access is not about increasing test dates and lowering registration fees by region. It's understanding that students applying to university don't have the same opportunities to prepare and test and for that reason, should not be penalized for that.”

Seeking guidance on test registration procedures, test score submission, test preparation, and other related questions can also carry hidden costs. In the US, many students face student-to-counselor ratios that are far too large, but many students outside the US have no access to counseling at all. In both cases, the lack of guidance inhibits access. As such, students in wealthier families and schools are more likely to receive this information through resources provided by the school or by hiring a consulting service. Low-income students, in contrast, often lack access to the same support and information.

Students who can work with knowledgeable, well-resourced college counselors are better able to make alternate arrangements when testing difficulties arise and make more informed college choices related to testing. Students who do not have access to a counselor, or work with counselors managing large caseloads, must navigate these changes with less guidance. In some cases, and as witnessed more often in an international context, students may seek help from individuals who are not well-informed and who may take advantage of a student's and/or family's lack of knowledge of the process.

## To make informed decisions about testing policies, the task force felt strongly that institutions need to understand a variety of student perspectives with respect to the overall experience of taking college admission exams.


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There are also entirely different issues facing international test-takers, many of which cost students the chance to take tests or receive scores:

- **Mass test score cancellations** are among the most serious, as testing organizations struggle to manage a global testing network securely. Thousands of students outside of the US have been required to retake the exams, at significant cost—financially, emotionally, and mentally—[due to mass cancellations](#). Test reuse, digital technology, and the physical expanse of the global testing system have accelerated cheating processes that strain the agencies' ability to prevent such occurrences globally. So far, these cancellations have been unique to the international testing environment, though score cancellations on a smaller scale occur regularly in the domestic context.
- **Fee waivers for low-income families are available in the US, but not outside of the US**, except for a few programs targeting low-income, high-achieving international students.
- **Tests that are meant to be standard are administered differently outside the US**. For example, international test-takers are only able to take the ACT as a computer-based exam, unless they have been approved for accommodations.
- **International students who require customer service face greater obstacles** due to time differences.

To make informed decisions about testing policies, the task force felt strongly that institutions need to understand a variety of student perspectives with respect to the overall experience of taking college admission exams. These experiences are witnessed most acutely by the counseling community, which serves on the front line as the face of the testing agencies to students and their families. As one counselor on the task force noted, “The higher education community has to understand that everything they are hoping for in an applicant—curiosity, passion for learning, desire to explore new interests—is often impeded

by the sheer hours of conversation and preparation that standardized testing requires. It feels that the precious time of both students and those who advise them is disregarded.”

 **Call to Action: Consider the impact of every requirement that your institution places on students in the admission process. Specific to testing requirements, call on testing agencies to make testing-related information and data readily available to better understand costs to students.**

### *Costs to Secondary Schools*

In weighing costs of standardized testing, institutions cannot overlook the costs to secondary schools. The College Board and ACT could not function without secondary schools, as their business model relies on the support of secondary school personnel to advertise tests; assist students with registration, accommodations, and score sending procedures; prepare for and proctor test administrations, including for students outside of their school and for students who receive testing accommodations; manage and troubleshoot all technology and mailing associated with testing; and serve as the customer service first contact for the testing agencies when issues arise. This labor infrastructure operates year-round with minimal, if any, compensation from the testing agencies, and often inadequate support from the agencies themselves.

The international testing experience is even more complex with added security measures in place to combat the heightened potential for cheating in the global context. In addition to the responsibilities listed above, test administrators at non-US locations are responsible for receiving exams that arrive in large, padlocked boxes that have to be stored as ordered, not knowing if the shipment is correct and if enough exams have arrived for those registered to test. Test center supervisors abroad, particularly in [Asia](#) and the [Middle East and North Africa region](#), also regularly deal with last-minute cancellations as a result of a cheating incident. It is also quite regular for testing center staff who do not have US bank accounts to wait up to a year for remuneration for their administrative services.



## International Testing Experiences

### ***China Testing***

For many students in China, access to test prep—through a paid service in a tier-one city, or a program like Khan Academy or Kaplan ACT Prep—is not an issue. There is an incredible amount of societal pressure for students to take standardized tests many times to achieve scores that are as close to perfect as possible. As a result, a super-predatory industry has emerged in China that preys on the lack of information, a desire for US education, and a fear of competition. The average amount families pay for test prep is US\$20,000, but many pay more, and the quality of instruction is usually low, and often linked to uninformed college counseling. The need for testing has yielded several unscrupulous outfits that purport to have access to testing material that will boost an overall score.

Consider the following scenarios:

*A student took the October 2019 SAT and seemed to know her overall score a few hours after the test. Asking how she knew this, the student forwarded the counselor a copy of the actual October SAT provided to her by her test prep company. Though the counselor couldn't confirm if the student had seen the material prior to the test, the fact that the counselor had the test in hand, two days after the test's administration was shocking. The student was also correct about her test scores when they were officially released.*

*When the College Board opened August testing in the United States but not internationally in 2019, test prep companies recommended that students take the test in the US. Within a few days of the new academic year starting, several seniors and juniors jetted out of China to take the test abroad. Most flew to Los Angeles. Students missed school from Wednesday to Monday, returning jet-lagged and ready to retake in October. In addition to the financial costs associated with this international trip to take the exam, the hidden costs to these students included the amount of time prepping for the test, which came at the expense of class time and time for extracurricular activities and sleep.*


### ***Sub-Saharan African Testing***

Certain school-based testing centers are set up to take outside test-takers. As a result, the test-site administrators become de-facto counselors to additional families needing help with the registration process. Finding a testing center and then managing the costs to take that test is one of the major concerns for students testing in sub-Saharan Africa. Those students not in private schools or lacking access to a counselor are truly at a disadvantage even before they sit down to take the test.

Some families could end up spending three times the amount of the actual test to get to the test center. Some countries have just one test center in the capital city; other countries, like South Sudan, Somaliland, the Democratic Republic of the Congo, and Chad, don't have any testing centers at all. The cost to take the exam is already prohibitive. Add to that the cost of crossing borders, bus travel, lodging, and meals, and students can end up spending more money than their family earns in a month! It is not uncommon for students to change their entire college planning mid-year when they receive their first and only SAT results. That one sitting was the only one the family could afford and as a result, decisions were made to prepare the student for a different plan altogether that did not involve additional tests outside of the national exams.

Furthermore, the services that counselors, who often also serve as test center supervisors, provide to students and families related to college admission testing are numerous. These include assisting students with score interpretation, self-reporting scores, and score choice; understanding and promoting the varied college admission requirements involving testing; and counseling and assisting with test preparation.

It has only been recently, as a result of school closures due to COVID-19, that testing agencies have, with limited success, reached out to professionals within the higher education community to see if they would be willing to host the tests in order to increase capacity. There have even been calls for testing agencies to open and run their own testing centers. Particularly during and immediately after the COVID-19 pandemic, financial and logistical demands on high schools will be significantly greater due to the need for public health measures and increased staffing. At the time this report was written, the task force was unaware of whether secondary schools would be provided with the resources by either the testing agencies or colleges and universities to account for the added cost of administering tests. The testing task force asks institutions to consider if this burden should continue to be placed on secondary schools.


 **Call to Action: All stakeholders need to reexamine the infrastructure utilized for standardized testing. Institutions that consider testing as part of the admission process should evaluate the institution's obligation to administer tests and make tests available to all students. ■**

## DATA-INFORMED DECISIONS: DOES THE VALUE JUSTIFY THE COSTS?

What information should be accessible to institutions when making decisions about standardized testing requirements? The task force, as illustrated above, articulated a general understanding of the costs to students, with attention to costs in an international testing environment, though there was an overwhelming desire to learn more. Specifically, task force members sought information from the testing agencies that they felt should be publicly and easily

accessible to accurately define the student and secondary school experience with testing (Appendix D). The task force's goal was to make recommendations informed by data, and more importantly, to help institutions make decisions about whether the value of requiring college admission exam scores justifies the cost.

Given the challenges facing the testing agencies and their justifiable priorities in determining how best to continue to serve the higher education community during the COVID-19 crisis, the testing agencies were not able to respond to the detailed questions in a timely fashion, nor likely would the task force have been able to analyze such information during its remaining time frame.

 **Call to Action: The testing task force recommends that NACAC, in consultation with its members, pursue this information over time, and in accordance with the task force's overall recommendations, in order to further inform the professional discussion.**

With respect to the origins of this task force in concerns raised by the international counseling community, the task force encourages colleges and universities to closely examine student experiences from applicants outside the United States. International students are too often considered a homogeneous group in discussions about institutional policy. Just as holistic admission relies upon context, context in the testing experience matters. Importantly, as the entities that require and/or receive test scores to inform admission decisions, postsecondary institutions have both a right and an obligation to determine the type of information needed about the tests and the test-takers to make informed admission policy decisions.

## TASK FORCE RECOMMENDATIONS

Institutions must make an active decision to determine whether admission tests add sufficient value to the admission process to justify the social and monetary costs, which the task force has outlined in the report. The task force respects that institutions will arrive at different decisions about the usefulness of standardized tests in their admission processes. It is recommended, however, that when considering standardized test requirements, institutions make decisions guided by these values.

**Be student-centered. Offer simplicity and clarity in a time of complexity and heightened anxiety about the college admission process. Though the COVID-19 pandemic created additional barriers to accessing standardized tests, certain populations—including international applicants, who are critical to postsecondary institutions—have faced barriers for decades that will remain, or even be exacerbated, if or when testing returns to pre-COVID-19 operations.**

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Decisions should:

- **Consider the public good.** Consider what admission policy decisions mean for higher education generally, and whether institutional policies and practices enable more students access to higher education.
- **Be student-centered.** Offer simplicity and clarity in a time of complexity and heightened anxiety about the college admission process. Though the COVID-19 pandemic created additional barriers to accessing standardized tests, certain populations—including international applicants, who are critical to postsecondary institutions—have faced barriers for decades that will remain, or even be exacerbated, if or when testing returns to pre-COVID-19 operations.
- **Focus on student success.** Review historical institutional data for enrolled students to determine the factors that contribute to student success.
- **Be transparent and provide clearly stated explanations for all decisions related to testing.** Share data that has informed decisions, clearly articulate the resulting decisions and justifications, and share data that results from policy changes or continuations. Avoid ambiguous language.
- **Include a plan for conducting frequent reviews.** Commit to regular assessment of institutional data to inform testing policy.
- **Consider unintended consequences.** Standardized tests have served a role in the evaluation process to assess

cognitive characteristics of students independently of any particular secondary school curriculum. External assessments can be thought of as a counterweight to information from secondary schools that have an interest in the outcome of the selection process. When colleges and universities no longer utilize SAT or ACT scores, and other measures of academic achievement become more important in determining who is admitted, does this place new pressures on secondary schools?

**For institutions that require tests, the task force recommends that institutions:**

- **Conduct predictive validity studies regularly and share the results.** Results of predictive validity studies are most commonly used to review, validate, and/or refine criteria used in the admission process. Openness about this process, and why decisions are made about factors in admission decisions, can help to restore public trust in and understanding of the college admission process.
- **Report the middle 50th percentile of test scores for admitted students, at minimum, and consider more robust and transparent reporting to allow students to assess their prospects for admission.** Colleges and universities that require tests have an obligation to prospective students to provide transparent information on what they will need to submit to qualify for admission or scholarships—test scores being one factor. Reporting the middle 50th percentile provides a broader range of the entire pool of students. Institutions should also consider breaking down scores by applicant type, such as international applicants, to help students better assess their fit.

**There are a range of testing policies that allow institutions to deemphasize the role of standardized tests in admission decisions, including test-optional, test-flexible, and test-blind. Institutions that opt for a test-optional or test-flexible policy must acknowledge that certain populations of students may still feel an obligation to submit scores, and should carefully examine student expectations, experiences, and outcomes to ensure that the goals of test-optional policies are met.**

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- **Consider the impact of score policies on the student experience.** Testing agencies and institutional policy, such as superscoring, incentivize students to take standardized tests more than once. Barriers to access exist for a single sitting—consider the demographic profile of students who are able to take the exams more than once. The College Board’s website includes the following: “There’s evidence that retaking the SAT may be an effective strategy. Students who retake the SAT usually get a higher score the second time. However, while low-income students are more likely to benefit from retaking the SAT, they’re far less likely to retake it than their higher-income peers.”

**For test-optional institutions, the task force recommends that institutions commit to:**

- **Clearly explaining the rationale for the specific test-optional policy.** There are a range of testing policies that allow institutions to deemphasize the role of standardized tests in admission decisions, including test-optional, test-flexible, and test-blind. Institutions that opt for a test-optional or test-flexible policy must acknowledge that certain populations of students may still feel an obligation to submit scores, and should carefully examine student expectations, experiences, and outcomes to ensure that the goals of test-optional policies are met.
- **Explaining exceptions to test-optional policies related to academic programs, as well as for**

**financial and merit aid considerations.** Pathways should also be provided to program areas that will still require a test score for admission into certain technical, science, or honors programs. Similar to above, requiring standardized testing for individuals who would like to be considered for programs that could help them access higher education, such as merit or state-level aid programs, does little to remove this testing barrier.

- **Clearly articulate to whom the test-optional policy applies and, if not to all applicants, the rationale for excluding certain populations.** The National Center for Fair & Open Testing (FairTest), for example, references a separate, [independently curated list by Sarah Loring de Garcia](#) for international applicants because of the vast differences in policies. There may even be further distinctions for US citizens living abroad, which may differ from citizens of other countries. Consider the impact on both students navigating and counselors advising on non-standard policies.
- **Share outcomes data, disaggregated by key demographic variables (e.g., race, ethnicity, socioeconomic status, financial aid, and high school type).** In addition to analyzing outcomes data for the purpose of developing admission policy, share data widely to promote broad understanding of the effects of test-optional policies. Doing so will enable stakeholders, including students, faculty, administrators, and policymakers, to maintain confidence in admission processes.

- **Provide clear guidance about how applicants will be evaluated.** NACAC suggests that institutions make publicly available accurate, complete, and current information concerning the factors considered in making admission, financial aid, and scholarship decisions, including, but not limited to, students' demonstrated interest, social media presence, personal conduct, legacy status, and financial need. Given the public perception of the outsized role of standardized tests in competitive admission, there is concern about how institutions' "equations" for evaluating students will change as a result of not having test scores. Be transparent and specific. ■

## FUTURE DIRECTIONS

Several critical topics were identified by the task force, but the scope of its charge and time limitations prevented adequate examination. The task force calls on NACAC to continue to pursue information to guide practice regarding the following:

- **The application process beyond standardized testing.** How do other parts of the application process contribute to inequities for prospective students? The task force recognized that few, if any, admission credentials are free of bias. Research shows, for example, that low-income students and students of color have less access to a high-quality, rigorous curriculum. Additionally, new challenges will arise in a post-COVID world where grading has been adjusted, and activities and work outside of the academic setting have been disrupted.
- **The role of technology in the future of testing.** Social distancing and operating in a virtual environment as a result of COVID-19 placed new stresses on an antiquated testing system and forced testing organizations to adapt. Practitioners, however, have [raised legitimate questions about the effects of the proposed adaptive testing measures](#), such as at-home testing, particularly on those who are already at risk of dropping out of the college pipeline—low-income, first-generation students. Many lessons can be learned from the recent Advanced Placement at-home testing experience

in May. The digital divide between low-income and upper-income students is persistent and well-documented. As testing organizations continue to develop technology-adapted measures, which have the potential to address universal access and lower costs, issues of equity will need to be at the center of development. However, the task force recommends that colleges and universities must first assess the underlying equity concerns with the current tests and ensure they are addressed before examining the use of technology to make the test more available.

- **New or alternative tests:** Institutions considering new or different tests should examine such possibilities in light of the framing questions listed above. Importantly, institutions should consider whether new or alternative tests provide statistically significant, new information not already reflected in students' secondary school records. ■

## CONCLUSION

The task force emphasized that reassessing our use of standardized tests is but one element involved in examining inequity in college admission. Moreover, examining college admission practices is but one element involved in examining inequities in educational systems in the US and around the world. However, as college admission counseling professionals, we are obligated to examine what we can control and what we can change. Standardized testing is one area that the task force believes institutions, with the guidance in this report, should feel empowered to reexamine and to demand that, regardless of location and circumstance, such tests foster equity and access for their applicants. Institutions must take advantage of the opportunity brought about by COVID-19 disruptions to make changes that are carefully evaluated, that balance institutional circumstances and needs with those of the greater good, and as a result, will be more likely to persist and impact necessary change. Regardless of the policy any single institution follows, however, we all must carefully scrutinize our actions to ensure outcomes that are consistent with our shared mission in support of equity and access. ■

## NACAC Recommendations on Ensuring Integrity in College Admission Testing

July 11, 2016

Dear Colleague,

The NACAC Board of Directors today accepted recommendations on integrity in standardized testing proposed by our International Initiatives Advisory Committee. In light of the recent spate of testing scandals, we felt it imperative to outline challenges faced by students, families, and institutions domestically and internationally as they enter the upcoming testing season. The committee has developed a set of recommendations that we approve and wish to share with the testing organizations.

We encourage increased transparency and future collaboration among NACAC, the testing organizations, and other interested parties to ensure we can all better fulfill our roles of assisting students in the transition from high school to college.

We thank the members of the International Initiatives Advisory Committee for their many hours of dedicated work on this complex issue.

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### **NACAC Recommendations on Ensuring Integrity in College Admission Testing**

Standardized testing has been a valuable tool in undergraduate college admission in the United States for more than 90 years. The tests, as well as practices related to administration and interpretation, have evolved over time. They have adapted to changes in the US higher education landscape, including the massive growth and diversification of postsecondary participation by American students and the increasing enrollment of international students at US colleges and universities.

The testing agencies have introduced content, formatting, and scoring changes to improve test validity and usefulness and to correct for biases at key junctures throughout the tests' lifespan. In the past decade, the unprecedented rate of technological change in society - especially in regard to information-sharing technologies -- is presenting a unique challenge to the effectiveness and integrity of these evaluative tools. Additionally, globalization is reconfiguring the world in such a way that what happens beyond US borders impacts the environment within them (and vice-versa) more immediately and unavoidably than ever before. America and "the rest of the world" are not silos.

Recent alarming reports, combined with the cumulative experience of practitioners in the field, have highlighted a growing, significant, and immediate challenge: how to curb cheating on exams in the US and abroad when the technological means to cheat have never been more available. Students seamlessly, and often times innocently, share test content within minutes of finishing their exams. Organized cheating rings use social and mobile tools to share that same content in real time. Standardized testing organizations monitor popular websites and attempt to ensure that what is illicitly shared is quickly removed. The effectiveness of these efforts is further undermined by the proliferation

of private messaging channels, whether SnapChat, WeChat, or platforms yet to come. As an organization that is sympathetic to this problem, NACAC appreciates that this is an overwhelming task.

The US higher education community relies on the integrity of academic credentials, including standardized test results, to effectively administer the admission process. The exams provide a way for some institutions to compare student achievement across different educational systems in the US and other countries. Based on the cumulative experience of NACAC's college admission counseling professionals—an association committed to postsecondary access and success—we offer the following urgent recommendations to the testing agencies as means for ensuring the integrity of standardized test results domestically and internationally:

- Recognize that while the re-use of entire standardized test forms or test questions is a long-standing practice, the proliferation of modern communications technology today has rendered it vulnerable to easy exploitation.
- Provide abundant, immediate, and proactive communication with students and families, secondary school counselors and the higher education community when problems arise.
- Significantly update and enhance education and training about test administration and security for all personnel, including college counselors and test supervisors, at all testing sites, domestically and internationally.
- Collaborate with secondary and postsecondary education stakeholders to promote better understanding of the role of culture in determining what constitutes cheating, the individual and social consequences of cheating, and the pedagogical reasons why cheating is deemed unacceptable in the United States.
- Recognize that situations that arise outside of the United States have direct implications domestically, and act accordingly.
- Regularly evaluate testing practices to ensure alignment within an educational and technological landscape that is both fast-changing and global.

In an effort to ensure integrity in the admission process for all students, families, and member institutions, NACAC will continue to advocate for measures that recognize changing pedagogical, cultural, security, and technological dynamics in college admission, both domestically and internationally.

With our best regards,

Phil Trout, President  
Nancy Beane, President-elect  
Jeff Fuller, Immediate Past President



### Statement Revisiting Recommendations to Testing Organizations in 2016

The standardized admission testing environment—within the US and internationally—continues to face substantial change and controversy. Since issuing a statement to testing organizations in July 2016, NACAC appreciates that efforts have been made to enhance communication with the association and our members about issues and changes. NACAC also recognizes that steps have been taken to address problems in the industry, such as exploring Computer Adaptive Testing, offering a conference on test security, and strengthening prevention techniques. However, **a number of issues remain unresolved, and some decisions have, in fact, created additional challenges and inequities for international students.** The **short-notice** cancellation of a scheduled test administration and limiting test dates are two such examples. More work must be done to ensure the fairness within the testing environment and integrity of test results domestically and internationally.

College counselors, who serve as partners in the conduct of test administration, preparation, counseling, and interpretation, and the admission community, some of whom rely on test results to make critical admission decisions, would benefit from an update from testing organizations about additional efforts to address the association's 2016 recommendations, which included:

- Recognize that while the re-use of entire standardized test forms or test questions is a long-standing practice, the proliferation of modern communications technology today has rendered it vulnerable to easy exploitation.
- Provide abundant, immediate, and proactive communication with students and families, secondary school counselors and the higher education community when problems arise.
- Significantly update and enhance education and training about test administration and security for all personnel, including college counselors and test supervisors, at all testing sites, domestically and internationally.
- Collaborate with secondary and postsecondary education stakeholders to promote better understanding of the role of culture in determining what constitutes cheating, the individual and social consequences of cheating, and the pedagogical reasons why cheating is deemed unacceptable in the United States.
- Recognize that situations that arise outside of the United States have direct implications domestically, and act accordingly.
- Regularly evaluate testing practices to ensure alignment within an educational and technological landscape that is both fast-changing and global.



Standardized testing is an integral tool for many institutions in the undergraduate admission process. As such, NACAC plans to gather additional information to share with its members, testing agencies, and the broader education community to convey member concerns, shape policies, and ensure that resources used in the undergraduate admission process are reliable, fair, and equitable. In the meantime, NACAC welcomes the opportunity to collaborate on initiatives that advance our recommendations for the benefit of students and the professionals who advise them.

Contact NACAC Associate Director of International Initiatives Lindsay Addington ([laddington@nacacnet.org](mailto:laddington@nacacnet.org)) for more information.



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College Admission Counseling

1050 N Highland Street, Suite 400 | Arlington, VA 22201 | 800.822.6285 | nacacnet.org

**NACAC and International ACAC Urge Testing Flexibility for International Applicants for Class of 2018**

Over the past two years, NACAC and International ACAC have issued several statements to standardized testing agencies encouraging them to improve practices related to international test administration and security, and to proactively communicate with stakeholders about changes and when issues arise. While the testing agencies have taken some steps to address our concerns, there are remaining issues that we feel are necessary to communicate to our member colleges and universities to ensure that you are aware of how international applications might be affected by difficulties in test administration and participation.

NACAC and International ACAC remain respectful of the complexities involved with administering a test internationally, particularly as the unprecedented rate of technological change presents additional challenges. However, the rise in large-scale, systematic cheating, among other factors, has resulted in changes to the testing environment causing significant disruptions for students who test outside of the United States. **This has now become a major issue of equity and access for US citizens abroad and international students.**

As a result, NACAC and International ACAC urge colleges and universities that require or recommend standardized testing for admission or scholarships to consider the following when reviewing international applicants.

**Testing Options for International Applicants Were Significantly Reduced for 2017-2018**

- In February 2017, the College Board announced that the June 2017 administration of the SAT was being canceled at all international locations
- Also in February, the College Board announced changes to the overall number of international testing dates for the SAT for the 2017-18 and 2018-19 school years. International administrations were significantly reduced to 4; those within the US have 7 administrations from which to choose.

<b>Inside US</b>	August, October, November, December, March, May, and June	7 testing dates
<b>Outside US</b>	October, December, March, and May	4 testing dates



- The September 2017 ACT test was canceled for students, as reported by counselors in the Asia Pacific region, in Australia, China, Hong Kong, India, Indonesia, Japan, Kyrgyzstan, Macao, New Zealand, Pakistan, Philippines, Russia, Singapore, Taiwan, Thailand, and Vietnam. Options for rescheduling this exam have not been arranged; students are encouraged to sign up for another scheduled administration. ACT maintains a policy of not confirming or publicizing information about security-related cancellations, though NACAC and International ACAC believe this information is critically important for college and university admission offices.

#### **Testing Changes Resulted in Disruption to College Admission Planning and Inequity among Applicants**

- Students' college preparations, which optimally are a coordinated plan of testing and curriculum considerations and coordination, have been disrupted. Students who have the opportunity to work with a well-connected, well-informed college counselor have made alternate arrangements when possible. For example, students scheduled for the cancelled June 2017 SAT had to scramble and quickly prepare for the May SAT while potentially also preparing for AP exams. Students who do not have access to a counselor, have had to navigate these changes with little to no professional guidance.
- Students who have the means to travel to countries less likely to be impacted by testing cancellations are doing so. Furthermore, students who have the means to travel to the United States to take advantage of additional testing dates, are opting to do so. This potentially reduces the number of spots accessible for domestic students, especially the ones with the least access to quality counseling.

#### **What Colleges and Universities Can Do:**

- 1. Communicate with international counselors and prospective students to better understand the impacts of these testing changes, and to ensure that these difficulties have not discouraged students from applying to your institution, or applying for an earlier deadline, such as early decision.**
- 2. Educate admission staff and application readers who are involved with international recruitment or application review about these changes. Ensure admission teams are aware that these test cancellations resulted in international applicants having fewer testing opportunities than their peers in the United States.**



**Reminder about Good Practice Related to Test Score Use and Interpretation**

- NACAC and testing agency standards advise institutions to avoid making fine distinctions between applicants based on small differences in test scores given the margin of error on both ACT and SAT. For example, academic research suggests that retaking tests often results in a score increase for students. In addition, small gains from test preparation activities can also yield score increases, though the extent of such increases is debated. This is particularly important for students who have only been able to take the test once.
- Research shows that predicting first-year grades based on standardized tests for students with limited English proficiency is extremely difficult.
- Though English proficiency is the top factor for admission decisions with international applicants, the other leading factors are remarkably similar to those for domestic students—grades in college preparatory courses, strength of the curriculum, and overall high school GPA. Institutions also rate the essay/writing sample as considerably important for international applicants, more so than with domestic applicants, likely because of the additional confirmation of English skills that the essay provides.

**What Colleges and Universities Can Do:**

- 1. Educate admission staff on these fundamental best practices related to standardized admission test score interpretation.**
- 2. Consider whether test scores, in light of the difficult circumstances faced by international applicants, will receive the same emphasis in this admission cycle.**
- 3. Be transparent and clearly describe to all relevant stakeholders how standardized tests will be considered in this year's admission process.**

If you have questions or comments, please contact Lindsay Addington, Associate Director of International Initiatives, at [laddington@nacacnet.org](mailto:laddington@nacacnet.org).

[Extracted from 2018 Assembly Meeting Minutes]

**Delegate Motion Recommendation to the Board of Directors – Elisabeth Marksteiner,  
International ACAC**

I MOVE:

To recommend NACAC consider establishing a commission on testing, to examine, research, and respond to the testing inequality facing students (US citizens residing outside the US and international students), with a particular focus on student access and communication with students, universities, and high schools. We recommend the commission research and report back on:

- Access to testing for US citizens residing outside the US and international students
- Examination of the customer service/communication with students, universities, and high schools.
- Barriers for students with accommodations (US citizens residing outside the US and international students)
- Access to fee waivers for US citizens and international students residing outside the US

The motion was adopted after amendment and debate.

## STANDARDIZED ADMISSION TESTING: NACAC MEMBER PERSPECTIVES

### INTRODUCTION

NACAC's testing task force asked members to share their experiences with standardized admission testing, particularly for students who have tested outside of the US. More than 300 members provided comments through the online form. NACAC staff read and coded the comments based on recurring topics for each question. Looking at the topics across questions revealed broader themes that indicate a flawed process, primarily due to issues of access and fairness.

This feedback was collected during the last two weeks of February 2020, so it does not capture the most recent changes in testing experiences as a result of the coronavirus pandemic. NACAC also received very few responses from community-based organizations and public secondary schools.

#### Professional Affiliation of Respondents

	Number	Percent
Private secondary school	143	44.5
Public secondary school	20	6.3
Public postsecondary institution	40	12.3
Private postsecondary institution	57	17.7
Independent educational consultant (IEC)	49	15.1
Community based organization	6	1.9
Retired	5	1.6
Other	2	0.6
<b>TOTAL</b>	<b>322</b>	

#### Country of Residence of Respondents

	Number	Percent
United States	219	70.6
Non-United States	91	29.4
<b>TOTAL</b>	<b>310</b>	

Note: The specific countries represented are listed at the end of the report.

### OVERARCHING THEMES

#### Lack of Access to Testing

Member comments made it clear that students outside of the US experience considerable barriers simply to be able to take a test, including long travel distances, significant financial costs, and time away from school.

- ❖ *"Lack of dates, centers, limited accessibility making the exam very expensive."*
- ❖ *"Lack of predictability and consistency, at least for students in areas where test centers exist. Bigger challenge of limited/no access for students who are not in close proximity to test centers."*
- ❖ *"At times students have missed school in order to fly to the US or another country to sit for the exam in order to make up for a cancelled test or out of fear that a fall exam will not be offered..."*

### Fairness and Equity Issues

Members also highlighted several issues related to equity and fairness, including differential access to test prep, increased opportunities for cheating, and last-minute test cancellations.

- ❖ *“Lots of things - opportunities for cheating, SAT reusing exams in international locations, exams being canceled at the last minute due to factors beyond students’ control.”*
- ❖ *“The changing of format and test dates over the past few years has made it hard to plan ahead. Many international students feel like second-class citizens.”*
- ❖ *“Biggest challenge is the fact that the English section is even challenging for native English speakers. Many of my students are able to perform well on the math since math is pretty universal, but English is still a big struggle”*
- ❖ *“Privileged and areas of affluence allow many students to have more advantages to test higher than those who are under-resourced or marginalized. Although there are free test preparation tools, test prep coordinators are often costly.”*

### CODING OF COMMON TOPICS FOR EACH QUESTION

#### Experiences with International Standardized Testing

Respondents were asked to describe their experience with the SAT or the ACT for students who have taken the test outside the US. Among the most common negative experiences that members reported were issues related to difficulties in accessing the test—limited testing days (16 percent) and the travel required (13 percent). Issues related to fairness were also mentioned—the prevalence of cheating (10 percent), cancellation of test dates (10 percent) and test bias toward western/American culture (7 percent).

It’s worth noting that a substantial portion of the respondents (20 percent) reported having little to no experience in the area of testing for international students, and 9 percent were colleges with test optional policies. Public school counselors and respondents living within the US were far more likely to be among the respondents with little to no experience with standardized testing in the international context.

#### Themes: Experiences with Students who Test Outside US, by Professional Affiliation

	All Respondents	Percent by Respondent’s Professional Affiliation				
		Public Secondary	Private Secondary	Public College	Private College	IEC
Have little to no experience*	19.9	65.0	19.9	20.5	9.1	10.4
Limited testing days are available	15.6	0.0	8.5	12.8	12.7	16.7
Students must travel great distances to take tests*	12.5	5.0	16.3	2.6	1.8	25.0
Test dates get cancelled*	10.3	0.0	8.5	12.8	12.7	16.7
Cheating is prevalent	9.7	0.0	11.3	12.8	12.7	4.2
School is test optional*	8.4	0.0	0.7	28.2	27.3	0.0
Testing is stressful	8.1	0.0	12.1	0.0	5.5	10.4
Test has bias to western/American culture	7.2	0.0	7.8	10.3	9.1	4.2
Test scores are often delayed or cancelled	6.5	0.0	7.8	10.3	7.3	2.1
No problems with current testing process	6.2	0.0	3.5	7.7	12.7	6.3
Poor communication with College Board	5.6	0.0	7.8	2.6	5.5	0.0

Testing is costly	5.0	0.0	4.3	2.6	7.3	8.3
Students are sacrificing school time for test prep	4.7	0.0	8.5	0.0	1.8	4.2
Tests are used to assess English proficiency*	3.4	0.0	0.7	12.8	7.3	2.1
Students who pay for test prep do better than those who do not*	2.2	0.0	1.4	0.0	7.3	0.0
Other	24.3	20.0	27.0	28.2	20.0	25.0

\* Statistically significant differences were found based on respondents' professional affiliation.

Note: The professional affiliation categories Community-based organizations, Retired, and Other are not shown because the number of responses was too small. The number of public secondary school respondents was also low, so these results should be interpreted with caution.

Note: Percentages add to more than 100 because a single comment could be coded with more than one topic/theme.

Looking at other results by location of the respondent indicates that the most common concern among non-US based professionals was limited testing dates, followed by travel distance requirements. Non-US respondents were far more concerned about these issues than those in the United States. Respondents outside of the US also were more likely to cite communication issues with College Board and to be concerned with students sacrificing school time for test prep.

**Themes: Experiences with Students who Test Outside US, by Location**

	All Respondents	Percent by Respondent's Location	
		United States	Non-US
Have little to no experience*	19.9	26.1	4.4
Limited testing days are available *	15.6	8.7	34.1
Students must travel great distances to take tests*	12.5	6.0	29.7
Test dates get cancelled	10.3	9.2	13.2
Cheating is prevalent	9.7	11.0	6.6
School is test optional	8.4	10.1	5.5
Testing is stressful	8.1	6.9	9.9
Test has bias to western/American culture	7.2	6.4	8.8
Test scores are often delayed or cancelled	6.5	6.4	7.7
No problems with current testing process	6.2	6.9	3.3
Poor communication with College Board*	5.6	2.8	11.0
Testing is costly	5.0	3.7	8.8
Students are sacrificing school time for test prep*	4.7	3.2	8.8
Tests are used to assess English proficiency*	3.4	5.0	0.0
Students who pay for test prep do better than those who do not	2.2	3.2	0.0
Other	24.3	21.1	34.1

\* Statistically significant differences were found based on respondents' location.

Note: Percentages add to more than 100 because a single comment could be coded with more than one topic/theme.

**Biggest Challenges for SAT/ACT Test Takers**

School counselors and college admission professionals were also asked to report what they believed to be the biggest challenges in international standardized testing. Half of the 322 respondents stated that the largest issue was a lack of access to tests, and 29 percent cited cheating as a challenge. Access issues include limited testing locations and test dates, as well as test score availability. Cheating is a common reason why test scores are delayed or cancelled, resulting in significant challenges for students who live



outside of the US with submitting scores before deadlines. Other reported challenges in international standardized testing included the high cost incurred by students, access to test preparation materials, and inherent test bias towards American culture. Postsecondary respondents were more likely than other groups to cite the costs associated with testing.

**Response Coding: Biggest Challenges for Standardized Test Takers, by Professional Affiliation**

	All Respondents	Percent by Respondent's Professional Affiliation				
		Public Secondary	Private Secondary	Public College	Private College	IEC
Access to tests*	50.5	11.8	51.8	51.3	58.9	52.1
Cheating on test	29.2	23.5	35.3	23.1	23.1	25.0
Cost*	14.3	11.8	8.6	25.6	30.4	4.2
Tests have bias towards American culture*	14.0	23.5	7.9	25.6	19.6	12.5
Value of test called into question	11.1	23.5	10.8	10.3	12.5	10.4
Access to test prep	10.2	17.6	9.4	17.9	8.9	4.2
Language barrier	8.3	11.8	5.0	10.3	15.4	14.6
General unfairness and inequity*	7.0	11.8	9.4	5.1	0.0	8.3
Tests becoming only available online	3.5	0.0	5.8	0.0	1.8	4.2
Student stress	2.5	0.0	5.0	0.0	0.0	2.1
Time zone issues	2.5	0.0	0.0	2.6	0.0	4.2
Lack of communication with College Board	1.9	0.0	2.2	0.0	1.8	2.1
Other	19.0	17.6	19.4	7.7	25.0	18.8

\* Statistically significant differences were found based on respondents' professional affiliation.

Note: The professional affiliation categories Community-based organizations, Retired, and Other are not shown because the number of responses was too small. The number of public secondary school respondents was also low, so these results should be interpreted with caution.

Note: Percentages add to more than 100 because a single comment could be coded with more than one topic/theme.

Respondents working outside of the US were more likely than US-based respondents to cite access to tests as a concern (66 percent versus 44 percent). For cheating, it was US-based professionals who were more likely to be concerned (35 percent versus 12 percent).

**Response Coding: Biggest Challenges for Standardized Test Takers, by Respondent's Location**

	All Respondents	Percent by Respondent's Location	
		United States	Non-US
Access to tests*	50.5	43.5	65.6
Cheating on test*	29.2	34.6	12.2
Cost	14.3	15.4	13.3
Tests have bias towards American culture	14.0	13.6	16.7
Value of test called into question	11.1	11.7	11.1
Access to test prep	10.2	10.3	11.1
Language barrier	8.3	10.3	4.4
General unfairness and inequity	7.0	7.0	7.8
Tests becoming only available online*	3.5	1.9	6.7
Student stress*	2.5	1.4	5.6
Time zone issues	2.5	3.3	0.0

Lack of communication with College Board	1.9	1.4	3.3
Other	19.0	15.0	28.9

\* Statistically significant differences were found based on respondents' location.

Note: Percentages add to more than 100 because a single comment could be coded with more than one topic/theme.

**Higher Education Institution's Testing Obligations**

Counselors and admission professionals were asked to describe what they believed the obligations of higher education institutions were under the current testing model. Twenty-one percent of counselors and admission officers stated that higher education institutions were obligated to understand the limitations and the context of standardized testing. Respondents from outside the US were twice as likely as US-based respondents to cite the need for test free/test optional policies (25 percent versus 9 percent), as well as exploring alternatives to standardized testing (23 percent versus 12 percent). Other obligations included the promotion of equitable admission practices and increased use of holistic review. Only three percent of respondents stated that nothing should be done or that testing should just be accepted the way it currently operates.

**Response Coding: Higher Ed Testing Obligations, by Respondent's Location**

	All Respondents	Percent by Respondent's Location	
		United States	Non-US
Understand the limitations/context of standardized testing	21.4	24.2	22.5
Go test free or test optional*	19.5	9.2	24.7
Promote equity in admissions	11.7	15.5	13.5
Promote alternatives to standardized testing*	11.0	11.6	22.5
View applications holistically*	10.1	14.5	7.9
Be clear with expectations for how testing will be viewed	7.8	8.7	7.9
Not sure/question unclear	6.8	6.3	4.5
Be flexible	6.5	4.8	5.6
Fix cheating issues*	5.2	6.3	1.1
Be consistent*	4.5	4.8	0.0
Help with test associated costs	3.9	1.9	2.2
Prepare students effectively for testing	2.9	3.9	2.2
Nothing can or should be done	2.6	2.9	2.2
Gather research/information on testing	2.3	4.3	4.5
Other	13.0	16.4	15.7

Note: Almost 7 percent of respondents indicated that the question wording was unclear.

Note: Percentages add to more than 100 because a single comment could be coded with more than one topic/theme.

**Additional Comments**

Respondents were also offered an opportunity to provide any additional comments they might have had. While these comments varied widely, several general themes did emerge. The largest theme, represented by 17 percent of the 322 respondents, involved respondents believing that schools should either become test optional or drop the testing requirement all together. Almost 16 percent noted that the tests were not equitable for students living outside the US, while 12 percent questioned the purpose

or value in standardized testing overall. Other topics covered in the comments include the need to reduce test associated costs (10 percent) and the need to develop more research on standardized testing (8 percent).

Two topics were more commonly mentioned by non-US based respondents in comparison to US-based respondents—tests are not equitable for students testing outside the US (20 percent versus 6 percent) and limited testing dates outside of the US (12 percent versus 1 percent). Only US-based respondents commented on the problems related to using high schools as test sites.

**Coding: Additional Comments**

	Percent
Schools should drop testing requirements or go test optional	17.0
Tests are not equitable for students testing outside of the US	15.6
There is a lack of efficacy/purpose/value in admission testing	12.2
Test associated costs should be reduced	10.2
More research on testing is needed	7.5
Technology should be better utilized in testing	5.5
There should be increased access to tests	5.5
There are not enough testing dates outside of the US	5.4
College Board has poor customer service	4.8
Colleges should be more transparent on how they use tests	4.8
High schools should not be testing sites	4.8
Holistic admissions are needed	4.1
Cheating should be reduced	4.1
More testing locations are needed	2.7
Alternatives to testing should be explored	2.1
Other	32.9

Note: Percentages add to more than 100 because a single comment could be coded with more than one topic/theme.

**Case Studies**

School counselors and college admission officers were given the opportunity to provide any unique stories or case studies related to standardized testing in international settings. About 20 percent provided stories of students traveling across continents due to the lack of seating available in their region. For example, one counselor explained that they had a student who had to travel to three separate countries to take various subject tests that were not available in their country. Sixteen percent explained how expensive this extensive travel is for the students. Eighteen percent stated that College Board has poor customer service, and 12 percent mentioned mistakes made by the College Board.

Some issues highlighted in the case study question were much more likely to be mentioned by non-US respondents, in comparison to US-based.

- There are not enough seats/testing locations available (41 percent versus 8 percent)
- College Board has poor customer service (18 percent versus 3 percent)
- There is inequity between US and international students (23 percent versus 3 percent)

**Coding: Case Studies**

	Percent
There are not enough seats/testing locations available	19.7
College Board has poor customer service	18.0
Expensive travel is needed to take test	16.4
Tests and test scores are often cancelled	14.8
Trouble with accommodations	11.7
College Board makes mistakes	11.5
Students cheat on test	8.2
Stress/Mental health issues due to testing	8.2
Testing conditions are poor	6.6
Parents and students' game the system	4.9
Tests are not representative of college readiness	4.9
There is inequity between US and international students	3.3
International students are not used to the US style of testing	3.3
Other	29.5

Note: Percentages add to more than 100 because a single comment could be coded with more than one topic/theme.

**Countries Represented Among Respondents**

	Percent
Australia	0.3
Azerbaijan	0.3
Bahrain	0.3
Bangladesh	0.3
Brazil	0.6
Brunei	0.3
Burundi	0.3
Canada	5.8
China	4.8
Costa Rica	0.6
Denmark	0.3
France	0.3
Germany	0.3
Ghana	0.3
Greece	0.3
India	2.3
Japan	1.0
Malaysia	0.3
Mexico	0.3
Myanmar (formerly Burma)	0.3
Netherlands	0.6
Qatar	0.3
Serbia	0.3
Singapore	2.3
South Africa	0.3

Switzerland	1.3
Thailand	2.6
United Kingdom	1.9
United States	70.6



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February 24, 2020

Kenton Pauls and Simmy Ziv-El  
ACT, Inc.  
P.O. Box 414  
Iowa City, IA 52243-0414

Dear Kenton and Simmy,

The NACAC Task Force on Standardized Testing for International and US Students conducted its first virtual meeting in December 2019. During that meeting, the task force discussed numerous questions related to the overall framework within which it will conduct its work. Many of the questions are best informed by facts and hard information, where available, to avoid basing discussions, conclusions, and/or recommendations on incomplete or inaccurate information.

To ensure that the task force’s work is based on good information, I write to request information from ACT on the questions articulated below. The task force is aware that some data might be available, some might be proprietary to ACT or otherwise private, and some might be unavailable. We are also aware that some of this information may already be available online, which our initial scan of the ACT web site might have missed. In these cases, do not hesitate to simply share the link where NACAC staff can obtain the information.

With these qualifications in mind, we ask that you consider sharing such information as you are able to help inform the task force’s discussion. Note that all questions and data requests below apply to the ACT admission test only.

General

- Number of ACT test takers globally (including US) by year for the past five years
- Number of ACT score sends globally (including US) by year for the past five years
- Total number of ACT test centers and seats (including US) by year for the past five years, if possible sorted by test center type or classification, such as school-based, non-school-based, or other type
- Locations of test centers globally (including US) by year for the past five years
- Number of non-US universities that require the ACT for undergraduate application by year for the past five years
- Do any national governments currently require the ACT as a requirement for application to their postsecondary institutions?
- What ‘market’ criteria are considered for opening or closing ACT test sites?

Student-Specific

- Average number of tests taken per student in the US
- Average number of tests taken per student outside of the US

Test Security

- Number of security incidents, as defined by ACT, over the past 5 years, domestic and abroad. If possible, the task force would benefit from understanding how ACT defines or classifies a security incident.
- Number of test administration cancellations both inside and outside the US over as a result of security issues over the past five years. If possible provide context as to the percentage of overall administrations that these cancellations represent.
- Number of score cancelations over past 5 years, domestic and abroad. If possible, of interest to the task force is the number of scores canceled by these rough groupings:
  - Individual
  - Small-batch (for example, scores canceled for all students at one school or test center)
  - Country-wide
- Cancellation policies/practices:
  - What conditions must exist for ACT to cancel a score(s)?
  - Is ACT able to provide a copy of the student user agreement to the task force?
  - Does ACT have enumerated communication protocols to students and other stakeholders (including postsecondary institutions and secondary school counselors) when scores are canceled? If so, is ACT able to share these protocols with the task force?
- Either descriptions of or policies that govern test delivery (to and from the test centers), test site administration, security, and quality assurance measures for administration of the ACT exam;
- Criteria by which ACT assesses applications submitted by schools or other entities to become a new test site.

Stakeholder Questions

- What are ACT's primary means of communicating with college admission stakeholders, including college admission offices, school counselors, and test administrators?
- What training and support resources are offered to ACT test site administrators? What are the current compensation processes and amount(s) for site coordinators/administrators?
- Can ACT provide an overview of the customer service/support process for test takers, school counselors, and others who support students who have tested or will test?

Additional questions to consider

- Does ACT have information on the distance students travel outside the US to take the ACT based either on the student's secondary school or home address? If so, can an estimate of the average distance traveled be calculated and shared with the task force?
- Can ACT provide a description of the process used to determine eligibility for and implement accommodations for students testing in non-US locations?
- Can ACT provide an update on the request for ACT fee waivers for students outside of the US?

So that the task force may consider this data in its discussions and report, a reply by early March would be appreciated. If additional time is needed, or you have any questions or need clarification on any of the



## Information Request: ACT

questions above, please contact David Hawkins ([dhawkins@nacacnet.org](mailto:dhawkins@nacacnet.org)) or Lindsay Addington ([laddington@nacacnet.org](mailto:laddington@nacacnet.org)) on the NACAC staff, and they will respond promptly.

Thank you for your consideration of the task force's questions.

Sincerely,



**John F. Latting, Ph.D.**  
Associate Vice Provost for Enrollment  
Dean of Admission  
Emory University







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**Chief Executive Officer**

Joyce Smith

February 24, 2020

Martha Pitts  
The College Board  
250 Vesey Street  
New York, NY 10281

Dear Martha,

The NACAC Task Force on Standardized Testing for International and US Students conducted its first virtual meeting in December 2019. During that meeting, the task force discussed numerous questions related to the overall framework within which it will conduct its work. Many of the questions are best informed by facts and hard information, where available, to avoid basing discussions, conclusions, and/or recommendations on incomplete or inaccurate information.

To ensure that the task force's work is based on good information, I write to request information from the College Board on the questions articulated below. The task force is aware that some data might be available, some might be proprietary to the College Board or otherwise private, and some might be unavailable. We are also aware that some of this information may already be available online, which our initial scan of the College Board web site might have missed. In these cases, do not hesitate to simply share the link where NACAC staff can obtain the information.

With these qualifications in mind, we ask that you consider sharing such information as you are able to help inform the task force's discussion. Note that all questions and data requests below apply to the SAT admission test only.

General

- Number of SAT test takers globally (including US) by year for the past five years
- Number of SAT score sends globally (including US) by year for the past five years
- Total number of SAT test centers and seats (including US) by year for the past five years, if possible sorted by test center type or classification, such as school-based, non-school-based, or other type
- Locations of test centers globally (including US) by year for the past five years
- Number of non-US universities that require the SAT for undergraduate application by year for the past five years
- Do any national governments currently require the SAT as a requirement for application to their postsecondary institutions?
- What 'market' criteria are considered for opening or closing SAT test sites?

### Student-Specific

- Average number of SAT tests taken per student in the US
- Average number of SAT tests taken per student outside of the US

### Test Security

- Number of security incidents, as defined by the College Board, over the past 5 years, domestic and abroad. If possible, the task force would benefit from understanding how the College Board defines or classifies a security incident.
- Number of test administration cancellations both inside and outside the US over as a result of security issues over the past five years. If possible provide context as to the percentage of overall administrations that these cancellations represent.
- Number of score cancellations over past 5 years, domestic and abroad. If possible, of interest to the task force is the number of scores canceled by these rough groupings:
  - Individual
  - Small-batch (for example, scores canceled for all students at one school or test center)
  - Country-wide
- Cancellation policies/practices:
  - What conditions must exist for the College Board to cancel a score(s)?
  - Is the College Board able to provide a copy of the student user agreement to the task force?
  - Does the College Board have enumerated communication protocols to students and other stakeholders (including postsecondary institutions and secondary school counselors) when scores are canceled? If so, is the College Board able to share these protocols with the task force?
- An update on the rationale for test/test item reuse, as well as updated information about whether the College Board is considering an alternative to test/test item reuse;
- Either descriptions of or policies that govern test delivery (to and from the test centers), test site administration, security, and quality assurance measures for administration of the SAT exam;
- Criteria by which the College Board assesses applications submitted by schools or other entities to become a new test site.

### Stakeholder Questions

- What are the College Board's primary means of communicating with college admission stakeholders, including college admission offices, school counselors, and test administrators?
- What training and support resources are offered to SAT test site administrators? What are the current compensation processes and amount(s) for site coordinators/administrators?
- Can the College Board provide an overview of the customer service/support process for test takers, school counselors, and others who support students who have tested or will test?

### Additional questions to consider

- Does the College Board have information on the distance students travel outside the US to take the SAT based either on the student's secondary school or home address? If so, can an estimate of the average distance traveled be calculated and shared with the task force?
- Can the College Board provide a description of the process used to determine eligibility for and implement accommodations for students testing in non-US locations?



- Can the College Board provide an update on the request for SAT fee waivers for students outside of the US?

So that the task force may consider this data in its discussions and report, a reply by early March would be appreciated. If additional time is needed, or you have any questions or need clarification on any of the questions above, please contact David Hawkins ([dhawkins@nacacnet.org](mailto:dhawkins@nacacnet.org)) or Lindsay Addington ([laddington@nacacnet.org](mailto:laddington@nacacnet.org)) on the NACAC staff, and they will respond promptly.

Thank you for your consideration of the task force's questions.

Sincerely,



**John F. Latting, Ph.D.**  
Associate Vice Provost for Enrollment  
Dean of Admission  
Emory University





NACAC