

Executive Board

(Systemwide Senate Review) Entry Level Writing Requirement Task Force Report and Recommendations

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Chair of the Assembly of the Academic Senate
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University of California
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June 2, 2023

**HAN MI YOON-WU, EXECUTIVE DIRECTOR
UNDERGRADUATE ADMISSIONS**

Re: UCOPE Recommendations on ELWR Satisfaction

Dear Han Mi:

At its May 24 meeting, the Academic Council approved two recommendations from the University Committee on Preparatory Education (UCOPE) related to satisfaction of the UC Entry Level Writing Requirement (ELWR).

The first recommendation is to establish two new methods for satisfying the ELWR by allowing scores of 3 or higher on either the Advanced Placement (AP) Seminar or AP Research exams administered by the College Board as sufficient to satisfy the ELWR.

The second recommendation is to make permanent the pilot begun in the 2017-18 admissions cycle that allows a cut-off score of 680 on the SAT Evidence-Based Reading and Writing Test (EBRW) as sufficient to satisfy the ELWR.

Please do not hesitate to contact me if you have additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Cochran", is written over a horizontal line.

Susan Cochran, Chair
Academic Council

Cc: UCOPE
Academic Council
Campus Senate Executive Directors
Executive Director Lin

Encl.



Eileen Camfield, Chair
University Committee on Preparatory Education
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May 1, 2023

SUSAN COCHRAN, CHAIR
ACADEMIC SENATE

RE: AP SEMINAR AND AP RESEARCH SCORES FOR ELWR SATISFACTION

Dear Susan:

During our January 26th and April 27th meetings this year, the Committee on Preparatory Education (UCOPE) discussed the possibility of adding the scores for the AP Seminar and AP Research courses to the mechanisms for satisfying the Entry Level Writing Requirement (ELWR) before matriculation to the UC. At our April meeting, the committee unanimously approved accepting scores of 3+ on either AP Seminar or AP Research for ELWR satisfaction.

UCOPE requests that Academic Council endorse this recommendation, thereby establishing a couple of new methods for satisfying the ELWR on a permanent basis, effective beginning matriculating students in Fall 2023. Undergraduate Admissions at UCOP should be notified about this decision.

This decision is based on a couple of factors. First, AP Seminar and AP Research – together referred to as AP Capstone – are at this point courses that most resemble what students actually encounter in UC college-level writing courses. Each of these AP courses requires substantial research-based writing, detailed feedback from peers and the instructor, meaningful revision, and presentation. Second, the 2023 IRAP study “AP Capstone Exams and the Entry Level Writing Requirement” found that these scores are at least on par with other scores that are currently accepted for ELWR satisfaction. The study concludes that “UCOPE should adopt the proposal to accept AP Capstone Research and Seminar scores of three or higher to meet ELWR...”, assuming that UCOPE sees no significant downside to this adoption, which it does not.

UCOPE requests that Academic Council endorse this recommendation and inform Executive Director of Undergraduate Admissions Yoon-Wu of this decision. Please feel free to contact me with any questions.

Best wishes,

Eileen Camfield, Chair
University Committee on Preparatory Education



Eileen Camfield, Chair
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May 1, 2023

SUSAN COCHRAN, CHAIR
ACADEMIC SENATE

**RE: THE REVISED SAT AND ACT AND UC'S ENTRY LEVEL WRITING
REQUIREMENT**

Dear Susan:

In 2017, the Committee on Preparatory Education (UCOPE) discussed revisions to the SAT, including the elimination of the combined score on its writing section and the introduction of an Evidence-Based Reading and Writing (EBRW) score and a separate SAT Essay score. UCOPE unanimously voted in favor of setting the threshold for the SAT EBRW at 680 to satisfy the Entry Level Writing Requirement (ELWR) for a pilot period that began in the 2017-2018 admissions cycle, and agreed to review subsequent outcomes data.

During its meetings on January 26th and April 27th meetings, the committee reviewed an analysis of data from the 2019 admissions cycle comparing Advanced Placement, SAT, and ACT scores to data from the systemwide Analytical Writing Placement Exam as well as performance in post-ELWR lower division writing courses in academic year 2019-2020. Based on the discussion, UCOPE voted unanimously to end the pilot and to confirm the cut score of 680 on the current SAT EBRW for ELWR satisfaction.

The committee asks that you endorse this recommendation and notify Executive Director of Undergraduate Admissions Yoon-Wu. Please feel free to contact me with any questions.

Best wishes,

Eileen Camfield, Chair
University Committee on Preparatory Education

November 4, 2022

Susan Cochran
Chair, UC Senate

Re: (Systemwide Senate Review) Entry Level Writing Requirement Task Force Report and Recommendations

Dear Chair Cochran,

At the November 3, 2022, meeting of the Executive Board, members reviewed the Entry Level Writing Requirement Task Force Report and Recommendations, and divisional committee and council responses. After discussion, members voted unanimously to endorse the report recommendations. However, they pointed to the CUARS letter in emphasizing the importance of writing instructor involvement in the oversight committee, suggesting that its composition included non-Senate writing instructors. Additionally, and also with reference to the CUARS letter, they requested clarification about how alternative assessment labor related to the Unit 18 Lecturers contract, wondering if UCLA was overly narrow in its interpretation of the contract (which makes compensating lecturers for this labor challenging on our campus).

Sincerely,



Jessica Cattelino
Chair
UCLA Academic Senate

Encl.

Cc: April de Stefano, Executive Director, UCLA Academic Senate
Andrea Kasko, Vice Chair/Chair Elect, UCLA Academic Senate
Shane White, Immediate Past Chair, UCLA Academic Senate

To: Jessica Cattelino, Chair
Academic Senate

From: Marco Giovannini, Chair
Committee on International Education

Date: October 27, 2022

Re: **Systemwide Senate Review: Entry Level Writing Requirement Task Force Report and Recommendations**

Dear Chair Cattelino,

At its meeting on October 26, 2022, the Committee on International Education discussed the Entry Level Writing Requirement Task Force Report and Recommendations.

Members expressed concern that the process to satisfy the UC Entry Level Writing requirement may be challenging for international students. The committee recommends clarifying how the campus placement process will be accessible to incoming international students. The committee also recommends providing additional guidance on how international students can navigate the process to fulfill the writing requirement.

Thank you for the opportunity to review and comment. If you have any questions, please do not hesitate to contact me via the Committee on International Education analyst, Emily Le, at ele@senate.ucla.edu.

October 24, 2022

To: Jessica Cattelino, Chair, Academic Senate

From: Robert Watson, Chair, Committee on Undergraduate Admissions and Relations with Schools

Re: Systemwide Senate Review of Entry Level Writing Requirement Task Force Report and Recommendations

At its meetings on September 23, 2022 and October 21, 2022, the Committee on Undergraduate Admissions and Relations with Schools (CUARS) discussed the report of the Academic Council Entry Level Writing Requirement (ELWR) Task Force, including questions related to ELWR placement and recommendations for updating the UC Entry Level Writing Requirement (Senate Regulation 636).

Overall, members agree with the report's efforts to strike a balance between systemwide oversight and individual campus's autonomy in developing fair, reliable, and locally appropriate standards for ELWR placement. The committee commends the Task Force for incorporating placement principles that emphasize equity and fairness.

One issue of importance and of special interest to UCLA is a problem with the recommendation on p. 13 of the report, titled "Establishment of an ELWR Oversight Committee," where "The ELWR Task Force vigorously recommends the establishment of an ELWR Oversight Committee, an autonomous standing committee consisting of Senate Faculty writing experts from all UC campuses with experience in or familiarity with ELWR."

Specifying that the members be Academic Senate faculty precludes representation from the writing faculty at UCLA (and at Berkeley), where the leading writing experts are Lecturers, and therefore lack Academic Senate status (which is unlikely to change anytime soon). If we insist on Academic Senate status for all members of this committee, it will replicate an existing problem with representation on UCOPE, which is already deprived of this expertise in its overview of issues of preparatory education. Since the ELWR oversight committee should presumably include the experts from each campus who know the field, the systems, the curricula, and the issues best, it seems important either to remove the words "Senate Faculty" from that sentence. Or, if the Board and/or the Senate feels it is best to keep these issues explicitly under Senate control, it could say, "led by Senate Faculty and consisting of writing experts from...".

Having received input from UCLA's Writing Programs faculty, members are generally supportive of the recommendation to allow campuses to develop pilot placement programs with a UC-wide supervisory board tracking their effectiveness and gathering data to ensure that programs are beneficial and equitable, thus enabling informed decisions about which pilots to make permanent.

In line with the report's recommendations, the UCLA campus seems inclined to work towards a collaborative model that involves students substantially in placement decisions, but retains the final placement for UCLA. However, CUARS members and writing instructors both note the impossibility of

establishing a completely new and test-free process for UCLA's incoming 2023-24 class. Evaluating students without standardized testing will be complicated and labor-intensive. A particular obstacle has been UCLA APO's insistence that the recent Unit 18 contract means that Lecturers must be compensated for additional placement duties only with course-releases, not ninths or any form of summer pay; other UC campuses seem to have found ways to pay Unit 18 lecturers for this time-sensitive assessment and placement work, and we encourage the Executive Board to encourage the APO to find some similar arrangement.

CUARS shared the sentiments conveyed by other campuses that robust systems and infrastructure must be developed and appropriately funded in order for alternative placement processes to be successful. Members underscore the importance of achieving a workable, meaningful, and equitable process, grounded in data, that does not add undue burden on students and instructors alike.

Some suggested that a composite capped unweighted GPA could be used for placement, but GPA so compressed in the upper regions at UCLA and a couple of others that it might not be a useful benchmark. Still, UCLA, with help from our Admissions office, is studying whether or not such GPA predicts successful placement for students currently placed in our sections of English Composition 1, 2 and 3.

The Task Force's primary principle—that "Writing placement methods must be first and foremost instruments of equity"—seemed valid to the committee, assuming by "equity" we mean meeting students where they are, and providing them the support that gives each of them the best possible opportunity to thrive in their undergraduate education. It should not mean pretending that all students arrive with equal writing skills, or holding some students back to eliminate advantages they may have had in their previous education.

There was some concern that the "or" in the Task Force's question "Does our writing placement method serve students as an instrument of equity, or do different populations perform differently on the assessment?" implies that any differential performance by groups means the assessment is necessarily ill-serving equity, when often the opposite is true. Any evaluation method should certainly avoid unjust biases, but we believe that the equitable benefit actually depends on placing students differently to help them succeed at UCLA, not waste their time or morale by teaching them in ways not suited to their current preparedness for university-level writing in university modes.

While members were in agreement that a one-time standardized exam should not be only indicator used to place students, some wondered about the striking of the word "test" in point 2 of the proposed revisions to SR 636, given that the guiding principles as a whole still seemed to reflect the tenets of "reliability" and "validity" used in educational and psychological testing. It was suggested that alternative ELWR assessments might instead look beyond traditional standards of reliability and validity.

Thank you for the opportunity to opine. If you have any questions, please contact me via the CUARS analyst, Julia Nelsen, at jnelsen@senate.ucla.edu.

CC: April de Stefano, Executive Director, Academic Senate
Andrew Fuligni, Vice Chair, CUARS
Andrea Kasko, Vice Chair/Chair-Elect, Academic Senate
Julia Nelsen, Committee Analyst
Shane White, Immediate Past Chair, Academic Senate

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Los Angeles, California 90095

October 25, 2022

To: Jessica Cattelino, Chair, Academic Senate

From: Kathleen Bawn, Chair, Undergraduate Council

Re: Systemwide Senate Review of Entry Level Writing Requirement Task Force Report and Recommendations

At its meeting on October 21, 2022, the Undergraduate Council discussed the report of the Academic Council Entry Level Writing Requirement (ELWR) Task Force.

Members were generally in agreement with the report's recommendations related to updating the UC Entry Level Writing Requirement. Members were supportive of the overall recommendation to make placement processes more rational and equitable, and less reliant upon standardized placement tests of dubious accuracy.

Clarification was sought on some of the recommended revisions to Senate Regulation 636, particularly point A (from "...respond adequately to written material typical of reading assignments in freshman courses," to "...respond adequately in writing to material typically found in first-year writing courses"). Some members noted that the proposed change is substantive and seems to lower the bar for entry-level writing in a way not justified by other concerns regarding equity raised elsewhere in the report.

Thank you for the opportunity to opine. If you have any questions, please contact me via the Undergraduate Council analyst, Julia Nelsen, at jnelsen@senate.ucla.edu.

CC: April de Stefano, Executive Director, Academic Senate
Anne Warlaumont, Vice Chair, Undergraduate Council
Andrea Kasko, Vice Chair/Chair-Elect, Academic Senate
Julia Nelsen, Committee Analyst
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September 1, 2022

CHAIRS OF SENATE DIVISIONS AND COMMITTEES:

Re: Systemwide Senate Review of Entry Level Writing Requirement Task Force Report and Recommendations

Dear Colleagues,

I am forwarding for systemwide Senate review the report of the Academic Council Entry Level Writing Requirement Task Force (ELWR-TF). Council charged¹ the Task Force to collect and analyze campus ELWR data, to consider questions related to ELWR placement, and to develop recommendations for updating Senate Regulation 636², the UC Entry Level Writing Requirement.

The Task Force's Phase 1 Report (provided here as a link³) includes initial findings and observations based on data the Task Force collected about the use of the ELWR across campuses. Its Phase 2 Report (attached) includes specific recommendations for the UC Entry Level Writing Requirement and a proposal to update Senate Regulation 636. We ask Senate reviewers to focus on the Phase 2 Report placement principles (pages 10-13); recommendations (pages 13-16); and proposed revision to Senate Regulation 636 (pages 16-18). Reviewers should refer to the Phase 1 Report for additional background and data as needed.

While these reports will be of particular interest to faculty who teach in writing programs, we encourage input from a broad range of faculty, especially those in writing-intensive disciplines, given the critical importance of writing preparation and proficiency to academic success at UC.

Please submit comments to the Academic Senate office at SenateReview@ucop.edu by November 14, 2022 to allow us to compile and summarize comments for the Academic Council's November 21 meeting. As always, any committee that considers these matters outside its jurisdiction or charge may decline to comment.

Please do not hesitate to contact me if you have additional questions.

¹ <https://senate.universityofcalifornia.edu/files/committees/elwrtf.pdf>

² <https://senate.universityofcalifornia.edu/bylaws-regulations/regulations/rpart3.html#r636>

³ <https://ucop.box.com/s/135p1bpg9cqt4teklidyln23g6v8ixcg>

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Cochran", written in a cursive style.

Susan Cochran, Chair
Academic Council

Cc: Senate Directors
Executive Director Lin

Encl.

The UC Entry-Level Writing Requirement: Considering Placement Principles & Practices

Presented by UC Entry Level Writing Requirement Task Force
Co-Chairs: Dana Ferris (UC Davis) & Karen Gocsik (UC San Diego)
Members: Mira Balberg (UC San Diego), Paul Beehler (UC Riverside),
Eileen Camfield (UC Merced), Penelope Collins (UC Irvine), Tim Dewar (UC Santa
Barbara), Jerry Won Lee (UC Irvine), Maggie Sokolik (UC Berkeley),
Liz Galvin (UC Los Angeles), Amy Vidali (UC Santa Cruz)
Principal Policy Analyst: Brenda Abrams
Submitted May 3, 2022

Executive Summary

Following up on our March 2022 report, the Entry Level Writing Requirement (ELWR) Task Force here addresses the second part of our charge: to consider questions related to ELWR placement. The priorities for this phase of our work have changed somewhat since the ELWR Task Force was created in March 2021, specifically in light of the UC's August 2021 decision to discontinue the systemwide administration of the Analytical Writing Placement Examination (AWPE) after 2022. We discuss the AWPE and this recent development further in the "History" section of our report, below.

We had expected when the Task Force first began its work to be offering our opinion as to the future of the AWPE, but that issue has now become moot. Instead, in this report we focus on writing placement as a general concern; the history of writing placement within the UC system; current placement models across ELWR programs on campuses; best practices and principles for writing placement going forward; and our specific recommendations for writing placement. The thesis of our report is two-part: (1) **that individual campuses need agency and autonomy to design placement processes in ways consistent with their campus needs, particularly their ELWR curriculum;** and (2) **that a model allowing input into the placement process from *both writing programs and students themselves* provides the best opportunity for placement to be successful and satisfying for all parties involved.** Consistent with an important theme of our first report, we will further argue that the principles of placement are coherent with the ELWR's potential to be an *instrument of equity* for our diverse student population. This task force affirms that the principles underlying writing/ELWR placement should be consistent across the UC system even as they are appropriately designed for local contexts, and we provide suggestions and recommendations to more firmly establish and maintain those shared values. We conclude this report by offering, as specified in our charge, possible revisions to SR 636, which governs ELWR and ELWR placement.

Background: Writing Placement at the UC

Writing Placement History in U.S. Composition Programs

Over the past 100-plus years, as students have applied to and matriculated at college and university campuses, there have been at least four major approaches to placing them into appropriate levels of

writing instruction.¹ These four approaches, which may coexist within the same program, are *indirect placement*, *direct placement*, *self-placement*, and *directed self-placement* (Crusan, 2002, 2011; Royer & Gilles, 1998). More recently, a new term has emerged: *collaborative placement*, which incorporates elements of both direct placement (in which the writing program unilaterally decides on the student placement) and self-placement (in which the student decides).

Indirect writing placement occurs when students are placed into a particular writing course or sequence based on their score or sub-score on a standardized test, such as the SAT or ACT. It is “indirect” because it is based not on students’ actual writing but rather on their judged “verbal ability” as seen through responses to multiple-choice questions. Though the UC is now moving away from the use of the SAT and ACT for admissions, students have for many years been able to satisfy ELWR by submitting verbal scores on one of those exams that met a specific benchmark. Similarly, students can satisfy ELWR and, in some cases, the lower-division writing requirement, by presenting high-enough scores on Advanced Placement or International Baccalaureate exams. Among composition/writing studies experts, the use of indirect placement as a primary mechanism fell out of favor several decades ago for various reasons, including questions of bias around the standardized exams themselves and the rather self-evident observation that the best way to judge students’ writing ability was by actually evaluating a sample of their writing (Isaacs & Molloy, 2010).

Direct placement occurs when students take an exam in which they produce an essay on demand in response to an assigned topic or prompt. These essays are scored by expert readers, often with the assistance of a detailed scoring rubric. The UC implemented direct placement in the late 19th century in the form of the Subject A exam, later renamed the AWPE, though as already noted, this direct placement mechanism has always co-existed at the University of California with indirect placement options such as the SAT. Direct placement can also include evaluation of writing that is not timed (e.g., a portfolio of previous work or a take-home essay task), but in most larger institutions such as the UC, it can be more difficult for practical reasons to administer these alternatives.

Though direct placement is obviously preferable to indirect placement, timed essay exams as a method of writing placement (or writing assessment in general) have also been criticized on a number of practical and principled grounds. The most important concerns focused on issues of equity, reliability, and validity. As to equity, students who are non-native speakers of English are at a strategic disadvantage when trying to pass a timed writing exam in their second/additional language. These students and others from underrepresented minority groups (URMG) may also stumble over the cultural and linguistic assumptions embedded in source texts and writing prompts used for the exams. Disabled students often struggle to obtain deserved accommodations. Students who are from less socioeconomically advantaged backgrounds may not have experienced the kinds of coaching and test preparation to which their more privileged peers may have had access (Kanno & Cromley, 2015; Kelley, 2020). Further, decades of research have demonstrated that scorers/raters of timed writing exams struggle to achieve acceptable levels of interrater reliability. As to validity, writing studies researchers have noted repeatedly that such

¹ “Levels” might include: waiver of first-year/lower-division writing requirements, for example through a high score on an Advanced Placement Examination; placement into a basic writing course; placement into a specialized course for multilingual students; and so on.

placement exams tend not to be representative of the writing tasks expected in university courses,² so such tasks cannot predict whether students will or will not be successful in these contexts. In other words, direct placement exams may not measure what they claim to measure—and even when they do, they may not do so equally well for all students.

As a result of these concerns over both indirect and direct measures of placement, writing researchers for the past several decades have called for approaches to placement that rely on *multiple measures* (as opposed to a single score on a standardized test or an essay exam) and/or on alternate approaches (such as student responses to questionnaires about their experiences, attitudes, and self-assessed writing abilities). Further, legal challenges to writing placement models that excessively disadvantage URMG students have led to entire systems (e.g., the California Community College system) recasting placement as advisory rather than binding upon students—in other words, allowing **self-placement**, in which students are allowed to register for whichever course(s) they feel ready for, regardless of any placement recommendations they may have been offered. Because self-placement carries its own set of risks—most notably that students will not be well enough informed about their options to make optimal choices—a model known as **directed self-placement** (DSP; Royer & Gilles, 1998) has evolved and gained acceptance. Indeed, DSP was adopted as the primary writing placement model for the California State University system in 2016. When DSP is well-executed, students are given substantial guidance about the writing curriculum and how to self-evaluate in relation to that curriculum—information that is essential in making an appropriate decision as to the writing courses in which they will enroll (Moos & Van Zanen, 2019). Typically, students complete some form of self-assessment questionnaire and may also submit a writing sample to guide them and their advisers in making successful decisions about their placement (Toth & Aull, 2014)). While the writing sample is sometimes a timed writing sample or a sample of students' high school work, many universities utilize sample readings and writings drawn from their program's curricular materials in order to ensure the validity of their directed self-placement models. The primary challenge with DSP is having sufficient resources to offer students meaningful guidance through what can be a complex self-assessment process.

Many writing programs, regardless of their preferred method of placement, use combinations of two or even all three of these general models. For example, at the UC, students have used the SAT or ACT (indirect placement) to meet admissions requirements but then have taken the AWPE (direct placement) to assess whether or not they have satisfied ELWR. At California community colleges, students may take indirect assessments such as Accuplacer but then ultimately self-place into courses they choose.

A more recent approach to writing placement—**collaborative placement** (Ferris & Lombardi, 2020), in which students and program representatives both have input into placement—also typically operates as a hybrid model. For instance, campuses may use standardized tests in order to determine who will undergo the collaborative placement process. Similar to direct placement, students engaging in collaborative placement may be invited to produce a writing sample. However, different from the direct placement model, this writing is often based on the campus's writing materials or assigned readings, ensuring that placement and course curriculum are in alignment. Moreover, similar to DSP, collaborative placement

² A nationwide study of assignments across the curriculum (Melzer, 2014) found that essay exams are relatively uncommon, but even when they are used in subject-matter courses, they are based on course content that the students have covered with their instructor, not an unfamiliar topic as in on-demand essay exams such as the AWPE.

typically queries students regarding their writing experiences, attitudes, and abilities and educates them about the campus's writing curriculum. However, collaborative placement differs from DSP in that, while students have input into their placement, the campus writing program and its faculty assessors make the placement decision. If students disagree with this decision, they can appeal by writing an argument defending their placement choice and/or by meeting with writing program personnel to discuss their placement.

In our view, any placement model that prioritizes cooperation among stakeholders (the writing program and the students themselves) offers the best option to mitigate any of the aforementioned concerns. A cooperative approach to placement invites student agency and uses student input at various stages of the process but also provides expert guidance. As we will discuss in our section on current placement practices within the UC, there are different ways that such placement can be structured, but these approaches share a commitment to student input paired with expert guidance as a central component of the placement process.

Writing Placement History at the UC

As already noted, the UC has long utilized a combination of indirect and direct placement methods to assess whether or not students satisfy ELWR before they matriculate at a UC campus. Many students have satisfied ELWR by submitting acceptable scores on one of the above-mentioned standardized tests. Others take coursework before their arrival on campus at a community college or other four-year institution that is deemed equivalent to a UC ELWR course. Students who remain ELWR-unfulfilled have had several options. High school students who are California residents and who have been admitted or waitlisted to a UC campus have been able to register for a statewide administration of the AWPE, typically held on high school campuses around California on a Saturday in early May. This timing allowed for the essays to be scored (for many years at a large in-person reading held over Memorial Day weekend) and the results to be sent to campuses in time for students to receive appropriate advising before registering for fall classes. Students who either resided outside of California or did not take the May AWPE for some reason have had the option of taking an on-campus administration of the AWPE, usually offered several times per year. In either case, students who did not receive a passing score on the AWPE would be required to register for on-campus ELWR coursework as soon as feasible because they typically only had one year (three quarters/two semesters) to satisfy ELWR or risk being disenrolled from the UC. A final option for ELWR-unfulfilled students who didn't take the statewide AWPE or who didn't want to take an on-campus exam was to simply enroll in an ELWR course without a placement score (i.e., what we described above as "self-placement").

The AWPE, formerly known as the Subject A Exam, has existed in some form since 1898 and was required of all incoming students beginning in 1905 (Briggs, 2018). As several histories of the exam (see Briggs, 2018; Stanley, 2010) have noted, the AWPE has led a "much-examined life" (Briggs), fighting off a notorious 1930s-era move to, as Briggs put it, "reduce the examination to a test of spelling and grammar." In 1985, in response to the creation of seven new UC campuses in the 1950s-60s, the UC Senate codified the AWPE as a required, system-wide exam (see SR 636). The most recent iteration of the AWPE has required students to write an essay in response to a prompt based upon a prose source.

As the field of composition and rhetoric evolved and timed essay exams as a single measure of proficiency fell into disfavor (see, e.g., CCCC, 2014), some writing experts and other administrators within the UC began to express concerns about the AWPE on the same grounds described above for direct placement methods in general: equity, reliability, and validity. A separate but related issue also arose: As individual campuses developed differentiated ELWR curriculum to meet the needs of their unique campus contexts and student populations, a one-size-fits-all approach to placement across the UC system became less viable.

The CCCC position statement on writing assessment (2014) notes that curriculum and assessment (which includes writing placement as a subcategory) are inextricably linked. Even with the system-wide commitment to the AWPE, which was codified in SR 636 in 1985, individual campuses have always had autonomy over their ELWR curriculum. It began to make less and less sense that the same placement process and tool (the AWPE) should be mandated for all UC writing programs, regardless of the characteristics of their local campus program. For example, several campuses found the need to design their own on-campus placement instruments for their growing population of international students, finding that the AWPE did not provide enough guidance to place those students into multiple-level pre-ELWR English language programs. Some students thus had to take two placement exams (the AWPE and the local assessment) before enrolling in appropriate coursework.

These concerns led in 2019-20 to a group of UC vice provosts and deans for undergraduate education (VPDUEs) to write a letter to UCOPE that raised questions about the AWPE's reliability, validity, and possible bias. This letter was followed up by a second letter strongly defending the AWPE by writing program administrators from five campuses, and a third from WPAs, representing the other four campuses, that shared the concerns of the VPDUEs. A document with all three 2019-20 letters is included in this report as Appendix A. Several meetings among UCOPE leaders and writing program administrators that followed those letters led directly to the formation of this ELWR Task Force in 2021.

In March 2020, after COVID-19 was declared a global pandemic, UCOPE announced that the May 2020 AWPE was canceled and asked individual campuses to come up with their own ELWR placement plans for the 2020-21 academic year. Though an online version of the AWPE was later added for June 2020, several campuses (Davis, Irvine, Santa Barbara, and Santa Cruz, later joined by Merced) had already begun planning for an alternate placement process for 2020.³ Representatives from those campus ELWR programs also met regularly to share ideas and provide support to each other. The other campuses (Berkeley, Los Angeles, Riverside, San Diego, and, initially, Merced) chose to continue with the AWPE for that year. However, because the decision had been made not to extend the system-wide AWPE to international students, campuses were left to determine what to do with international student placement. Because of this gap, some of those AWPE-favoring campuses implemented alternate placement processes for international students. UCOPE later extended permission for campuses to explore alternative models (i.e., a permitted suspension of SR 636) for the 2021-22 academic year.

³ It is worth noting that several campuses, including UCSC and UCD, had already begun exploring alternate placement models in response to concerns about the AWPE before the COVID-19 pandemic. While the exigencies of 2020 certainly accelerated the process, it would be inaccurate to state that the pandemic was solely responsible for it.

As mentioned in our introduction, several months after our Task Force began meeting, the UC announced the discontinuation of the systemwide AWPE after 2022. This development changed the trajectory of our task force in significant ways: instead of arguing for or against the continued use of this exam, which has endured in some form at the UC for well over a century, we find ourselves tasked with responding to the question, “How should ELWR placement be conducted at the UC in the future?”

ELWR Placement in 2022

Because of the alternate placement models that have been used in 2020 and 2021 by several campuses and the impending discontinuation of the AWPE, ELWR programs at the UC find themselves in transition. Campuses still relying on the AWPE will have to decide what to do next, and campuses using alternate models are still developing and revising the placement models that they implemented on an emergency basis in 2020 and updated for 2021 (and now 2022). In this moment of change, our Task Force has been asked to articulate principles and recommendations for future writing placement for UC ELWR students.

Before we turn to that discussion, we will first describe briefly what campuses are currently doing about ELWR placement as of spring 2022. For this section, we again rely on the 2021 survey data (from ELWR coordinators and from ELWR students) that we described in our Phase I report. It is important to remind readers of the state of transition in which these placements are and have been over the past two years. There is not much data to draw from to determine whether the alternative placement models are successful (or more so than the AWPE), and to be fair, the campuses designing them are still making adjustments to their processes, and will continue to make changes as campuses move toward more traditional post-COVID ways of operating. As a result of this present uncertainty, one of our most important recommendations is that all campuses be asked to collect and report on ELWR placement data in the coming years so that these newly implemented local approaches to writing placement at the UC can be properly evaluated.

2021 Findings

The campus survey that the ELWR Task Force sent out in summer 2021 (see our Phase I report) investigated how the various campuses were handling placement of newly matriculated students who had not yet satisfied ELWR. Table 1 shows the responses to the question: *How does your campus place students into ELWR courses? Choose all that apply.*

Table 1: Campus ELWR Placement Methods (as of Summer 2021)

Placement Method	Responses
Non-passing score on statewide AWPE	8 campuses (89%)
Non-passing score on local campus AWPE	5 campuses (56%)
Placement based on other local assessment (not AWPE)	4 campuses (44%)

Directed self-placement	1 campus (11%)
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As already noted, the dual exigencies of concern about the AWPE as a placement mechanism and the COVID-19 pandemic led to four campuses requesting and receiving permission from UCOPE to pilot their own alternative local assessments in 2020 and 2021. As of summer 2021, when campuses completed the survey, five of the nine campuses relied at least partially on on-campus administrations of the AWPE to place students into ELWR courses or to determine that they were ELWR-fulfilled (one of these campuses, UC San Diego, used the AWPE to test domestic students but employed an alternative collaborative placement approach to place its international students). The other four campuses (Davis, Irvine, Santa Barbara, and Santa Cruz) relied on locally designed placement processes, for which they had received permission in 2020 and 2021 from UCOPE in response to the COVID-19 pandemic. These models are further defined and discussed below. In addition, students from all campuses continued to take statewide administrations of the AWPE in 2020 and 2021, either because they didn't receive word that their campus wasn't requiring it or because they were not sure yet which UC campus they would attend (i.e., they may have been on a waiting list for an AWPE-required campus).

2022 Findings

Because the placement processes at the UC are currently in flux following the August 2021 announcement about the discontinuation of the systemwide AWPE, we felt that even the information we had gathered in our summer 2021 campus survey was rapidly becoming outdated. In response, we asked representatives from all campuses in March 2022 to describe more precisely what their programs did for placement in 2021 and what they are planning to do in 2022.

As already noted, five campuses used the AWPE for placement before the 2021-22 academic year, though two of those (Merced and San Diego) were piloting collaborative instruments or using them in combination with the AWPE. Specifically, San Diego had domestic students take the AWPE but had international students take an in-house placement exam with collaborative elements. Three campuses (Davis, Santa Cruz, and Santa Barbara) used collaborative placement and/or directed self-placement and Irvine used a locally designed placement instrument. For 2022-23, only Berkeley plans to use the AWPE as their sole placement test; San Diego and Riverside are using the AWPE and collaborative placement, while UCLA is using the AWPE but adding a student questionnaire. All other campuses are using either collaborative or directed self-placement models, and all campuses indicated that they intend to integrate some cooperative elements into their placement moving forward. These shifts over the past two years reflect campus responses to the announced discontinuation of the AWPE as well as alternatives developed in response to the greater freedom allowed to individual campuses during the COVID-19 pandemic.

For campuses still using the AWPE for placement, we asked whether students had the option to appeal their placement after receiving their results. One campus (Berkeley) said no, Merced said yes, and San Diego as well as Riverside indicated that students had the option to meet with a program coordinator to discuss their specific placement but not to opt out of an ELWR course. For those campuses following a collaborative model, we asked who makes the final decision about placement—the program or the student. Only in the case of UCSC, which uses DSP, does the student have the final say.

All campuses consider student writing samples as part of the placement process. However, while campuses using the AWPE ask students to compose a timed-writing sample in response to a short reading, campuses employing collaborative or directed self-placement models use writing samples in different ways. At Davis, for example, students first complete a survey based on questions about their backgrounds and literacy experiences as well as information provided about the different courses offered in the Entry-Level Writing and first-year programs. The responses then lead to a placement recommendation, which students can choose to appeal by providing a writing sample that is evaluated by faculty readers. At Irvine, students can provide samples of high school writing to supplement their responses to the campus placement instrument. The collaborative instrument developed at UCSD includes a written component read and assessed by faculty readers. At UCSC, students complete an educational, two-hour survey that has students interact with authentic program materials and videos (assignments, readings, and sample student essays), in addition to doing reflective writing that is considered by program faculty. This range of options is consistent with the different ways collaborative models have been described in the research literature. Finally, all campuses using collaborative placement described advising processes in which students can meet with a writing program or placement coordinator and/or adviser to understand their curricular choices and the recommendations provided by the placement process.

Placement Costs

Indirect placement systems (i.e., standardized tests) are by far the most ubiquitous across the U.S., primarily because direct and self-placement models have been assumed to be more labor-intensive and expensive to administer. Establishing locally based placement methods that will serve as instruments of equity will require significant resources. The costs of on-campus placement, regardless of type, vary dramatically depending upon campus. Berkeley, for example, has relatively few students who matriculate with ELWR not fulfilled. The modest costs of their on-campus administration of the AWPE for proctors and readers were largely reimbursed by systemwide AWPE funding, achieved by charging students a \$110 AWPE fee (though that fee was waived for the students with demonstrated financial need). For on-campus AWPEs and alternative placement methods, campuses spent between \$10,000-\$30,000 for costs that included administrative support, readers, proctoring, and course releases or summer stipends for faculty leaders. These costs were paid by college deans' offices with support from central campus (i.e., provost or undergraduate education budgets). Going forward without the systemwide AWPE, it will be useful to determine more precisely (a) how many students are being placed (for per capita costs); (b) what types of costs are being incurred; and (c) how many students can or should be charged a modest placement fee. This final point should include a consideration of whether (and how) fee waivers might be implemented. Additionally, all campuses using the AWPE need to offer disability accommodations for the exam; this is currently done unevenly.

Student Survey (Fall 2021)

As discussed in our first report, we surveyed students in ELWR courses at the end of the 2021 fall term about their experiences. This survey included questions about placement. Students were asked to indicate how they had been placed (or had ended up enrolling) in an ELWR course. Table 2 shows their responses.

Table 2: How Students Were Placed in ELWR Courses

Placement Method	Responses
Results from Statewide AWPE	1059 (72%)
Results from On-Campus AWPE	115 (8%)
Another Placement Exam (not AWPE)	155 (11%)
Completed a Survey or Spoke to Advisor	46 (3%)
Chose to Take the Course	34 (2%)
Not Sure	46 (3%)

As Table 2 shows, most of the respondents to this survey had been placed in ELWR courses via the AWPE. This is because only 19% of the survey responses came from campuses using an alternate placement model in 2021 due to timing or logistical issues. It was also interesting to see that 3% of students were “not sure” how they had ended up enrolled in an ELWR course. Students who said they took another non-AWPE exam for placement may have been referring to local placement exams for international students offered by several campuses. It is possible that terminology, which varies across local contexts, may have confused some respondents.

The students’ placement mechanism may also have influenced their initial and final reactions to their ELWR courses, as shown in Table 3. For this discussion, respondents who said they had been placed into an ELWR course based on an exam (the top three rows of Table 2) were counted in the “exam-based group,” and those who said they had either self-placed or been placed using an alternative approach were counted in the “non-exam group” (the next two rows of Table 2). Students who said they were “unsure” about how they had been placed were not considered in this analysis.

Table 3: Students’ Reactions to Placement/ELWR Course Sorted by Placement Type

Survey Item	Response Options	AWPE/Exam-Based (N=1326)	Non-AWPE/Exam (N=80)
Initial Feelings about Placement	Comfortable Not Sure Frustrated No Opinion	408 (31%) 436 (33%) 429 (32%) 53 (4%)	44 (55%) 39 (49%) 3 (4%) 4 (5%)
Reactions after Completing the ELWR Course	unsure→right decision comfortable→wrong decision comfortable→right decision frustrated→wrong decision	607 (46%) 103 (8%) 358 (27%) 162 (12%)	28 (35%) 9 (11%) 38 (48%) 1 (1%)

Table 3 indicates that student respondents who were placed into ELWR courses based upon an exam result (AWPE or other) were less likely to say that they were initially comfortable with their placement in the course than were students who enrolled via other methods. Notably, very few respondents from the “non-exam” group said they were frustrated about having to take the course, compared with 32% of the “exam” group. However, once they had completed the course, students reported that their attitudes towards their placement had shifted. Forty-six percent of students in the “exam” placement group said that though they had been initially unsure or frustrated about their placement, they were now glad they had taken the course. While 32% said they had been initially frustrated about having to take the course, only 12% still felt that way at the end of the course. As to the non-exam group, 11% said that though they had been comfortable with their initial enrollment in the ELWR course, they now felt that it had been the wrong decision for them—a percentage slightly higher than that of the exam group (8%).

Because of the relatively small numbers of students in the non-exam group, these findings should be interpreted cautiously. However, two generalizations emerge that are consistent with previous research and/or local observations. First, students who had some input or agency with regard to their placement had a more positive view of their enrollment in an ELWR course from the beginning. This is consistent with the predictions of the DSP model and with the findings of a small placement study from UCD (Ferris & Lombardi, 2020). Second, as we discussed in our first report, students overall had a strongly positive view of the value of their ELWR course experience, and even students who were initially unsure of whether they needed an ELWR course concluded at the end of the term that it had been the right decision to take the course. This comports with internal findings reported by the UCSD ELWR program.

Open-ended comments provided in response to questions in our survey also paint a more complex picture of student reactions. Some students felt that the exam that had placed them into the course had not given them a fair chance to show what they could do, and several expressed frustration that no one had explained to them why they hadn’t passed the placement exam. At the other extreme, some students who had taken a placement survey rather than an exam wished they had received more advising about how to make the best course choice. Further, student reactions seemed to be somewhat muddled by individual experiences with an ELWR course (e.g., they didn’t like their teacher or they thought the class was too much work). These comments suggest both avenues for ongoing research into student reactions to ELWR courses and placement models as well as a starting point for considering how current placement mechanisms could be improved.

Placement Principles

As noted in a previous section of this report, ELWR placement has been a topic of debate, particularly as discussed in the 2019-2020 correspondence between the VPDUEs and the campuses, and as addressed by various groups, including UCOPE and this task force. In these contexts, several questions arose that the task force has used to guide its articulation of principles for ELWR placement. These questions (the full collection of which can be found in Appendix B of this report) include the following:

- Does our writing placement method serve students as an instrument of equity, or do different populations perform differently on the assessment? And if they do, is their differentiated performance related to factors associated with the assessment or to something else?
- Does our placement method measure what we want it to measure? Are students effectively placed? How do we know?
- What does research tell us about the best way to manage writing placement? To what degree is our placement method in line with this research?
- Is our placement method designed so that it aligns with our campus's writing curriculum? Is it aligned with the kind of writing, reading, thinking, and reflection that students will be undertaking in their university writing courses?
- Does the overall format of our placement method provide an opportunity for students to reflect on and/or demonstrate their writing knowledge, skills, and abilities?
- Are the elements that comprise the placement process ethical and reflective of best practices?
- Are students satisfied with their writing placement, both initially and ultimately?
- What principles can help us ensure that our placement method continues to serve as an instrument of equity?

With these questions in mind, the task force endorses the following principles as governing ELWR placement:

Writing placement methods must first and foremost be instruments of equity. While we expect differences in test outcomes among students due to inequities in their prior writing education, these differences should never be a result of the test itself. Campuses must regularly assess their methods to ensure that they continue to serve as instruments that eliminate, rather than aggravate, opportunity gaps among students.

Writing placement methods must be demonstrably reliable and unbiased. In other words, placement methods must measure what they claim to measure, and they must do so fairly. Campuses must be able to demonstrate that their placement process is valid and attentive to concerns about bias in assessing achievement of ELWR criteria or placing students into ELWR classes.

Writing placement methods must be contextually and consequentially valid. In other words, placement methods must align with the kinds of writing, reading, and critical reflection that students undertake in their university writing courses. Any gap in the alignment of the placement method and the curriculum renders the placement method invalid.

Writing placement methods must align with the values and principles outlined in the ELWR Task Force's first Report. To accomplish this:

- Campuses should eliminate deficit language from the placement process. This should include the elimination of pass/fail language. Instead of passing or failing, the result of any process should be the placement of students into appropriate writing courses.
- In order to determine fulfillment of ELWR and placement into ELWR courses, campuses should draw from the criteria for fulfilling ELWR that are articulated in Appendix A of

the previous report. This will ensure that ELWR and ELWR placement are meaningful and consistent requirements across campuses.

Writing placement methods should be designed, implemented, and assessed by local experts, drawing from scholarship in the field, the demands of local curricula, and the particular needs of student populations. Campuses need to be able to explain their methods to stakeholders (e.g., students, administrators, ELWR oversight committee) by drawing from these factors.

Writing placement methods are best when they are designed to educate students and to encourage their agency. Programs should consider how to best educate students regarding their programs and curricula and should provide opportunities for students to exercise their agency in the placement process.

- Effective placement methods should gather information about students' backgrounds, practices, dispositions, and preferences, and should consider these elements in the students' placements. This information-gathering also has the benefit of encouraging students to actively reflect on the writing education that they received in high school.
- Placement processes should educate students about their different course options and curricula and should engage them in a process that gives them a sense of how the different curricula might align with their existing skills.
- Campuses should provide students with a method to ask questions about and/or to appeal their placements. These questions and appeals may or may not end up resulting in changes to a student's placement, but they should provide opportunities to educate students further about a campus's writing courses, and about expectations for writing at the university more generally.

Regardless of its format, a writing placement method must ask students to demonstrate and/or to reflect on their writing knowledge, skills, and abilities. The task force acknowledges that there are multiple ways to accomplish this. Each placement element or method should be guided by specific principles.

- **If the writing placement method includes a short reading:** The readings must be sensitive to cultural and linguistic differences and must not disadvantage under-represented or international students.
- **If the writing placement method asks for a writing sample in response to a reading:** Conditions under which that sample is obtained must be designed to optimize students' capacities to honestly demonstrate their best work. This includes clear, student-facing language on how to obtain disability accommodations for any timed reading or writing. The scoring criteria for that sample should be derived from the criteria articulated in the previous ELWR Task Force report. Placement will be facilitated by campus writing faculty, who will undergo locally-designed training that will enable them to align their assessments with both the local curricula and the system-wide criteria.
- **If the writing placement method invites students to reflect on their writing:** The process should provide a clear structure for that reflection, including learning about the

campus' writing curricula and considering how their past writing experiences align with that curricula.

- **If the writing placement method is collaborative placement:** The nature of this collaboration must be clearly defined, so that students and assessors have a clear sense of how the various elements of the process are weighed. The method should also provide a clear sense of the campus's writing curricula, so that students can carefully consider how their past writing experiences align with these different curricula.
- **If the writing placement method is directed self-placement:** The process must provide students with careful and comprehensive direction and support, so that they can make effective choices. The method should also provide a clear sense of the campus's writing curricula, so that students can carefully consider how their past writing experiences align with these different curricula.

Campuses must be accountable to students, to their campus, and to the university for their placement processes. As noted in our first report, it is the conviction of this committee that ELWR will continue as a vital instrument of equity and excellence on UC campuses only if 1) a knowledgeable body of Writing Studies experts is established to provide expert oversight of and support to ELWR, ELWR-satisfying courses, and ELWR placement practices; 2) individual campus programs, while exercising their autonomy over their ELWR courses and placement practices, are regularly self-assessing and periodically reporting back to their campuses, UCOPE, and this newly-established oversight body; and 3) sufficient resources are provided to support this assessment and to meet student and instructional needs.

Recommendations

Summary: While this task force believes that campuses must have local autonomy and local authority over their ELWR placement mechanisms, it also acknowledges that all UC campuses must endorse the aforementioned principles of ELWR placement in order for the requirement to retain its system-wide meaning and significance. To ensure that these principles continue to inform how ELWR placement is understood and implemented on the various campuses, an oversight group must be established to provide a structure for system-wide accountability. This ELWR Oversight Committee (EOC) will oversee regular assessment of campus placement models and curricula; it will also support ELWR by advocating in favor of campuses receiving the resources that they need in order to ensure that ELWR placement mechanisms remain reliable and valid instruments of equity.

The Establishment of an ELWR Oversight Committee, or EOC

The ELWR Task Force vigorously recommends the establishment of an ELWR Oversight Committee, an autonomous standing committee consisting of Senate Faculty writing experts from all UC campuses with experience in or familiarity with ELWR. We offer this recommendation because the work that we envision for the EOC is substantial, exceeding the capabilities of UCOPE by requiring the insight and commitment of writing faculty experts who can periodically but regularly review campus program data, materials, and self-studies in order to determine that the principles of ELWR are being upheld. As we envision it, the EOC, though autonomous, will report its findings and recommendations to UCOPE, serving in an advisory capacity to that committee.

Since submitting our previous report, this task force has developed a keener sense of this committee's potential responsibilities and how they might directly inform the work of UCOPE. These responsibilities should include the following:

- Conduct periodic reviews of campus curricula to ensure that they are aligned with ELWR principles and best practices, and report findings to UCOPE;
- Conduct periodic reviews of campus placement mechanisms to ensure their reliability, viability, and equitability, and report findings to UCOPE;
- Monitor the criteria and principles that govern ELWR, and recommend revisions to UCOPE;
- Support campus ELWR programs by championing ELWR principles and values;
- Advocate on behalf of ELWR to ensure that ELWR programs have the resources they need to implement, assess, and develop their curricula and their placement processes;
- Report on ELWR to other UC stakeholders, upon request.

Program Self-Assessment of the Placement Mechanism

In our earlier report, this task force noted that ELWR programs are most effective when their curricula, policies, and methods are data-informed. The same is true of ELWR placement mechanisms. We therefore recommend that ELWR administrators routinely collect, assess, and report on placement data. We further recommend that the data collected and reported on should be similar across campuses to the degree that this makes sense, given differences among placement methods. At minimum, regular assessments of placement should include:

- Assessments of the process's validity and reliability;
- Assessments of the process's fairness and lack of bias;
- Assessments of students' attitudes about their writing placement and their campus's placement processes;
- Assessments of placement as instruments of equity.

The EOC will work with campuses to determine how best to design and implement these assessments.

In addition to the data they gather, ELWR programs should regularly and systematically reflect on their placement processes. A rigorous reflection should consider how campuses might better align these mechanisms with current research in the field, as well as with the principles of equity and inclusion that are essential to a healthy ELWR. We offer in Appendix B several questions for reflection that might serve both as a set of questions to guide programs in their self-studies in preparation for program review, and as touchstones that program administrators and faculty might turn to as they make curricular and other decisions for their programs. The questions articulated in this appendix are those recently raised regarding placement—both in the letters between the VPDUE and various campuses (see Appendix A), and in conversations among stakeholders (including UCOPE and this task force).

Necessary Resources

This report has demonstrated that ELWR operates—and must continue to operate—as an important instrument of equity on all UC campuses. Under-resourcing these programs—including their placement

processes—does not serve our students, nor does it advance the university’s goals of equity and excellence. It is therefore imperative that campuses provide sufficient resources so that ELWR placement can function as it should.

These resources should include:

Resources for placement. Resources for placement include the financial and the personnel resources necessary to design and implement placement, to read and assess placement files, and to provide careful advice to students as they navigate the placement process. Funding for placement should be identified on committed, protected budget lines, based on enrollment projections. It is imperative that cost is not the primary driver of placement choice; rather, placement methods should always be designed in alignment with general ELWR principles and local curricular practices.

Important considerations:

- It is this task force’s position that those involved in designing and assessing a campus’ placement process should be members of the campus’s writing program. However, many campuses find it challenging to recruit a sufficient number of faculty readers to assist with writing placement. As we place more students locally, it may prove increasingly difficult for some campuses to secure sufficient placement personnel from among program faculty. Even when sufficient personnel are secured, it can be difficult to determine the manner in which these personnel might be compensated—especially for those campuses that need to complete placement before the end of the academic year, as Unit 18 lecturer contracts prohibit additional department work during that time. Campuses must ensure that ELWR programs have a stable group of faculty readers to support the placement process, and that these readers are paid from a stable and non-controversial funding source.
- Per SR 636, certain standardized test scores—in particular, the SAT and the ACT—are currently recognized as a way to fulfill ELWR, even though the research clearly establishes 1) that these test scores correlate significantly with income and privilege, and 2) that these test scores do not reliably indicate what they are presumed to indicate—i.e., the level of students’ preparation as writers. For these reasons, there are significant problems with using standardized test scores as a means to fulfill ELWR. However, eliminating these test scores as a means to fulfill ELWR requires significant resources, as some campuses would then have hundreds more students who will need to be placed into writing courses. Placing these additional students could weaken a program’s ability to engage meaningfully with students throughout the placement process. Before considering eliminating standardized test scores as a means of fulfilling ELWR, campuses must be assured of not only the financial resources but also the human resources to place these additional students. Though the Task Force has ideological concerns about the use of indirect placement through standardized test scores to determine ELWR fulfillment, this complicated matter of available resources needs to be carefully weighed by the EOC and UCOPE, with considerable input from the campuses.

Resources for supporting students. Students undergoing the placement process are in many cases under-represented and/or first-generation college students. Many of these students face financial challenges and so have traditionally had their AWPE fees waived. If campuses must charge for

placement, they will need to avoid placing disproportionate burden on these students. This issue, too, should be taken up by the EOC and UCOPE, who should work to ensure that resources are available to all students, on all campuses, as a matter of equity.

Resources for assessing placement. The kind of placement assessment that we are recommending cannot remain excellent and accurate without adequate resources. Specifically, campus programs will require access to data and to experts who can help in analyzing this data. To increase the ease and efficacy of placement assessment, campuses must make data easily and routinely accessible to ELWR programs. Appointing writing assessment specialists at the campuses to assist in program and placement assessment would further allow programs to determine the best way to develop their placement mechanisms so that they continue to be viable and reliable instruments of equity.

Conclusion and Recommendations for Revisions to SR 636

The Entry-Level Writing Requirement (ELWR) Task Force was appointed in March 2021 to investigate, report upon, and make recommendations about ELWR in general (Phase I, report submitted March 2022) and placement for ELWR (Phase II, report submitted May 2022). In the charge for the ELWR Task Force, we were specifically asked to recommend revisions to SR 636. This task became even more salient when, in August 2021, the UC announced that it would discontinue the Analytical Writing Placement Examination (AWPE) as a systemwide placement requirement after the 2022 administration.

In our Phase I report, we argued that ELWR is an **instrument of equity** for an increasingly diverse student population and provided evidence that although there are differences across campuses as to how ELWR curriculum is implemented, the stated goals and outcomes for ELWR courses across the system are remarkably consistent. In our second report, we argued for **campus autonomy** to design and implement placement mechanisms that will best serve the local context. That said, while acknowledging the need for local control of ELWR curriculum and placement, we also believe that **centralized oversight and evaluation processes** led by writing experts are necessary to ensure ongoing consistency, rigor, and fairness across the UC system. Thus, in both reports, we recommend the creation of an ELWR Oversight Committee (EOC) that would report to UCOPE.

With these points in mind, we offer the following recommended revisions to SR 636.

Recommended Revisions to SR 636, University of California Entry Level Writing Requirement (Am 19 Feb 2004; Am Jan 2008)

- A. University of California Entry Level Writing Requirement (**ELWR**) is a reading and writing proficiency requirement **designed to foster equity among University of California students by ensuring that all are** ~~Each student must be able to understand and to respond adequately in writing to written material typically found in of reading assignments in freshman first-year writing courses. This ability must be demonstrated in student writing that communicates effectively to University faculty.~~ (Am 30 Nov 83; Am 23 May 96; Am 19 Feb 2004)

- B. There are three ways a student may satisfy the University of California Entry Level Writing Requirement prior to enrollment at the University of California: by ~~passing the University of California Analytical Writing Placement Examination~~ **completing a local campus placement process and being placed into a post-ELWR writing class**, by attaining an acceptable score on another approved measure of ~~W~~writing, or by earning at least 3 semester credits or 4 quarter units of transferable college credit in English composition. (Am 19 Feb 2004; Am 30 Jan 2008)

1. The content **and methods** of the ~~University of California Analytical Writing Placement Examination~~ **local placement processes** shall be approved by the University Committee on Preparatory Education, **informed by the recommendation of the Entry Level Writing Requirement Oversight Committee**. **In collaboration with the campuses, these committees,**~~which~~ shall also set the ~~passing standard~~ criteria for the fulfillment of the Entry Level Writing Requirement. ~~on the University of California Analytical Writing Placement Examination.~~

2. The list of approved ~~tests~~ **measures** of writing shall be determined by the University Committee on Preparatory Education, **informed by the recommendation of the Entry Level Writing Requirement Oversight Committee** **and** with the concurrence of the Academic Council of the Academic Senate. The acceptable scores for each **placement measure** ~~test of Writing~~ shall be determined by the University Committee on Preparatory Education, **with input from the Entry Level Writing Requirement Oversight Committee**. (The current list of approved ~~tests~~ **placement measures** and the corresponding acceptable scores is on the [University of California, Office of The President web site](#).)

3. The student must earn a letter grade of at least C in any transferable college English composition course used to satisfy the University of California Entry Level Writing Requirement. (Am 6 Mar 74; Am 28 May 80; Am 26 May 82; Am 30 Nov 83; Am 4 May 86; Am 23 May 1996; 30 Jan 2008)

- C. There are two ways a student may satisfy the University of California Entry Level Writing Requirement subsequent to enrollment at the University of California: by ~~passing the University of California Analytical Writing Placement Examination~~, **being placed into a post-ELWR course via a campus's local placement process**, or by successfully completing a course or program of study approved for that purpose by an appropriate agency of the Academic Senate Division of the student's campus. (Am 28 May 80; Am 26 May 82; Am 19 Feb 2004; Am 30 Jan 2008)

1. To satisfy the University of California Entry Level Writing Requirement by means of a course, the student must earn a C or above or its equivalent. A student who receives a final grade of C- or below has not fulfilled the University of

California Entry Level Writing Requirement and may repeat the course(s). (Am 30 Jan 2008)

2. Courses satisfying the University of California Entry Level Writing Requirement are not remedial courses, per [SR 761](#), and so must be offered for baccalaureate credit. ~~Any award of baccalaureate credit for University of California Entry Level Writing Requirement course(s) must be consonant with [SR 761](#).~~ (En 30 Nov 83; Am 19 Feb 2004; Am 30 Jan 2008)

- D. A student who has not satisfied the University of California Entry Level Writing Requirement prior to enrollment at the University of California must do so ~~as early as possible~~ during the first year in residence. A student who has not satisfied the University of California Entry Level Writing Requirement after three quarters or two semesters of enrollment will not be eligible to enroll for a fourth quarter or third semester. Exceptions to this requirement may be made by an appropriate agency of the ~~campus's~~ Academic Senate Division of the student's campus. (Am 26 May 82; Am 23 May 96; Am 19 Feb 2004; Am 19 Feb 2004; Am 30 Jan 2008)
- E. Once enrolled at the University of California, students can earn transfer credit for a writing course taken at another institution only after satisfaction of the UC Entry Level Writing Requirement. Exceptions to this requirement may be made by the appropriate agency of the Academic Senate Division of the student's campus in cases where a student has earned transferable credit while on an approved leave of absence. (Am 30 Jan 2008; Am 12 June 2019)
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Appendix A:
2019-20 Letters to UCOPE Regarding ELWR/AWPE



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

December 17, 2020

MICHAEL BROWN
PROVOST AND EXECUTIVE VICE PRESIDENT
UNIVERSITY OF CALIFORNIA

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

Dear Michael:

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

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

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

Sincerely,

Mary Gauvain, Chair
Academic Council

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

Encl.



*Jeffrey Gagnon, Chair
University Committee on Preparatory Education
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*University of California
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December 4, 2020

**MARY GAUVAIN, CHAIR
ACADEMIC SENATE**

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

Dear Mary,

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

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

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

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

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

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

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

Sincerely,

A handwritten signature in dark ink, appearing to read "J. Gagnon", with a long, sweeping horizontal line extending to the right.

Jeff Gagnon,
Chair, University Committee on Preparatory Education

cc: Campus Writing Program Administrators



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April 15, 2019

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

Re: Analytical Writing Placement Exam (AWPE)

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

Validity of the AWPE

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

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

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

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

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

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

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

Conclusion and Suggestions for Next Steps

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

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

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UC Riverside

Michael Dennin
Vice Provost for Teaching and Learning/Dean for the Division of Undergraduate Education
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Catherine Koshland
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Jeffrey Stopple
Associate Vice Chancellor and Dean of Undergraduate Education
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Carolyn Thomas
Vice Provost and Dean for Undergraduate Education
UC Davis

Pat Turner
Vice Provost and Dean for Undergraduate Education
UCLA

Elizabeth Whitt
Vice Provost and Dean for Undergraduate Education
UC Merced

May 9, 2019

TO: Robert May, Systemwide Senate Chair

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

RE: The UC Analytical Writing Placement Examination

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

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

January 21, 2020

TO: Professor Kum-Kum Bhavnani, Chair, UC Academic Senate

Cc: Mary Gauvain, Vice Chair, UC Academic Senate

Darlene Francis, Chair, UCOPE

Jeffrey Gagnon, Vice-Chair, UCOPE

Eddie Comeaux, Chair, BOARS

Madeleine Sorapure, Vice-Chair, BOARS

Brenda Abrams, Principal Policy Analyst

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

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

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

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

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

Our Views on the AWPE

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Summary/Recommendations

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

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

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

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

Respectfully,

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Resources

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

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Appendix B:

Questions for Campus Reflection About ELWR Placement

The following questions are questions that have been raised by several different stakeholders regarding ELWR placement. The ELWR task force suggests that campuses use the questions as they undertake self-studies and reviews, or as they engage in designing or redesigning their placement processes.

- Does our writing placement method serve students as an instrument of equity, or do different populations perform differently on the assessment? And if they do, is their differentiated performance related to factors associated with the assessment or to something else?
- Does our placement method measure what we want it to measure? Are students effectively placed? How do we know?
- What does research tell us about the best way to manage writing placement? To what degree is our placement method in line with this research?
- Is our placement method designed so that it aligns with our campus's writing curriculum? Is it aligned with the kind of writing, reading, thinking, and/or reflection that students will be undertaking in their university writing courses?
- Does the overall format of our placement method provide an opportunity for students to reflect on and/or demonstrate their writing knowledge, skills, and abilities?
- If short readings are used in the placement process, are these readings favoring white students? Are the readings culturally marked, thereby disadvantaging minority or international students? Finally, are they an appropriate reading level for entering college students?
- If the placement method asks for a writing sample, is this writing sample timed? Is it the sole means of placing the student? How is the writing sample scored? Do the scoring criteria avoid deficit language? Are the scoring criteria in line with the criteria articulated in the previous report? Are students accurately placed via this writing sample? How do we know?
- If the placement method asks students to reflect, what guides them in this reflection? What is its aim? What does the student learn about their writing via this reflection? What do they learn about the campus' writing curriculum?
- If the placement method is intended to be collaborative, how is this collaboration structured? If invited to declare a placement preference, on what basis do students state their preference? How do readers weigh these preferences? Are students accurately placed by this placement method? How do we know?
- If the placement method is directed self-placement, what kind of direction is being offered? How do we know that this direction is sufficient and clear? How are students informed about their placement options? Have they been invited to reflect on their writing in a way that helps them to make a good placement decision? Are students accurately placed by this placement method? How do we know?
- Are students satisfied with their writing placement, initially and/or ultimately? How do we know?
- What principles can help us ensure that our placement method continues to serve as an instrument of equity?
- How can we work with an oversight body or advisory committee to ensure that our placement method supports ELWR and ELWR students?

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