



January 26, 2023

Re: Agenda Item X-H (4)

The Texas Higher Education Coordinating Board
1801 Congress Ave. Suite 12.200
Austin, TX 78701

Dear Members of the Board,

ACT recommends against adopting the amendments to the Texas Administrative Code concerning the ACT assessment as referenced on agenda item X-H (4). The proposal under consideration is to adopt updated college readiness benchmarks for the ACT assessments to be used to qualify for TSI exemption. The proposed ACT Benchmarks are a combined score of 40 on the English and Reading (E+R) tests and a score of 22 on the mathematics test. We believe that adopting these benchmarks will establish an unfair standard for students who seek the exemption with the ACT assessment. Based on our research, we propose benchmarks of 34 on the English and Reading tests (E+R) and 21 on the mathematics test.

The fundamental issue we see here is that the Board's current recommendation would separately establish exemption benchmarks for the ACT and the SAT assessments that are based on two different definitions of "college readiness." The current proposal is to adopt ACT's existing College and Career Readiness Benchmarks (22 Mathematics and 40 for English + Reading); the policy has already adopted the College Board's SAT College and Career Readiness Benchmarks (480 for Evidence Based Reading and Writing; 530 for Math). However, the criteria each organization used in its empirical research to establish their respective benchmarks are different, resulting in ACT benchmarks that are at a higher level of proficiency. The College Board defined college readiness as SAT scores in each subject that "represent a 75% likelihood of a student achieving at least a C grade in a first-semester, credit-bearing college course in a related subject."¹ ACT defined college readiness as ACT scores in each subject at which students "have at least a 50% chance of earning a B or higher grade and approximately a 75-80% chance of earning a C or higher grade in the corresponding college course or courses."² Although the definitions are similar, ACT's additional criterion of earning a B or higher results in benchmarks that are more difficult to achieve.

This difference is illustrated empirically by comparing the ACT and SAT benchmarks using the [2018 ACT/SAT concordance tables](#). The concordance was jointly produced by ACT and the College Board as a tool for finding comparable scores on the two tests. It is intended to inform this type of policy decision, and it does so in states throughout the country. If the College Board definition of college ready and associated benchmarks are used, the concorded ACT scores are a 34 on the English + Reading tests (6 points lower than the proposed E+R benchmark of 40), and 21 on the mathematics test (1 point lower than the proposed mathematics benchmark of 22). **The concordance objectively illustrates that ACT's College and Career Readiness Benchmarks are set at a higher level of proficiency than the SAT**

¹ The College Board, "K-12 Educator Brief The College and Career Readiness Benchmarks for the SAT® Suite of Assessments." Accessed online: <https://satsuite.collegeboard.org/media/pdf/educator-benchmark-brief.pdf>

² Jeff Allen and Justine Radunzel, "What are the ACT College Readiness Benchmarks." Accessed online: <https://www.act.org/content/dam/act/unsecured/documents/pdfs/R1670-college-readiness-benchmarks-2017-11.pdf>

benchmarks. As a result, if the Board adopts these benchmarks, students who take the ACT would have to meet a higher level of proficiency to obtain the same exemption. Because these scores also factor into the CCMR indicators for school accountability, the current recommendations would create an imbalanced comparison among Texas schools and negatively impact those that choose to provide the ACT to their students.

To quantify the impact of adopting the benchmarks currently under consideration by the Board rather than our recommended scores based on the empirical concordance, we are able to extract information directly from ACT's 2022 graduating class data from the state of Texas. As an example, were Texas to establish the higher ACT benchmarks (22 Math, 40 English+Reading), we estimate such a change would result in thousands fewer students who attain the exemption:

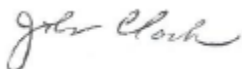
- **over 2,800 fewer Texas students** would be determined college ready in math and would not earn the TSIA exemption
- **over 12,000 fewer Texas students** would be determined college ready in reading and writing and would not earn the TSIA exemption

Furthermore, we estimate this change would impact **over 8,696 underserved students who took the ACT** (7,429 reading/writing and 1,267 math). These figures illustrate our concern about the potential impact of the policy decision.

ACT strongly believes that the exemption benchmarks should indicate an equivalent definition of college and career readiness, as determined by the empirical concordance research. Adopting ACT's recommended benchmarks using the concordance table would provide students the opportunity to earn an exemption based on the same definition of readiness no matter which assessment they choose and ensure students and schools are not negatively impacted. Since this impacts the state's accountability system, it would seem that an even bar for establishing the exemption would be vital, and we have this ability with the jointly developed ACT-SAT concordance tables. To do otherwise incentivizes districts to select the easiest path to higher accountability points and more state dollars, rather than what may be in the best interest of their students.

ACT was founded as a nonprofit organization more than 60 years ago with a mission to ensure that all individuals had equitable access and opportunity in education and the workplace. Like the Texas Higher Education Coordinating Board, our mission is to ensure greater access, fairness, and improved education outcomes so that the dream of higher education is within reach for all who seek it. Thank you for all that you do, and we look forward to being a partner to this end.

Respectfully,



John Clark
Senior Director, State Government Relations

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