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Eligibility for Admission to the University of California After the SAT/ACT: Toward a Redefinition of Eligibility

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**Eligibility for Admission to the University of California After the SAT/ACT:  
Toward a Redefinition of Eligibility**

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**ABSTRACT**

Eligibility is a policy construct unique to California. UC and CSU are the only US universities that distinguish between eligibility for admission and admission itself and set separate requirements for each. The eligibility construct derives originally from California's 1960 Master Plan for Higher Education, which famously mandated that UC admit students from the top 12.5% (and CSU from the top 33.3%) of California public high school graduates. Thus began a long and twisting saga of policy implementation that has become increasingly convoluted over time. UC's decision to eliminate the SAT/ACT in university admissions presents an opportune moment to rethink the eligibility construct from the ground up. This essay proposes, first, eliminating the now-antiquated "Eligibility Index," a mechanical algorithm that is increasingly at odds with the thrust of UC admissions policy over the past two decades; second, moving from a 12.5% eligibility target (the percentage of students who qualify for admission) to a 7.5% participation target (the percentage who actually enroll); and third, redefining eligibility from a norm-referenced to a criterion-referenced construct. *Using holistic or comprehensive review to select from among applicants who have successfully completed UC subject requirements at a specified level of proficiency, UC would admit that number of applicants needed to yield a 7.5% participation rate among California high school graduates.* This is the same average participation rate that the Master Plan has yielded historically, so that the proposal would be revenue-neutral with respect to State funding for UC. At the same time, like the 12.5% eligibility target, a 7.5% participation target would tie UC enrollment growth to growth in California's college-age population. Conversion from an eligibility to a participation target would not eliminate the eligibility construct but would redefine it. In place of a norm-referenced standard – whether students rank in the "top 12.5%" – eligibility would be redefined as a criterion-referenced standard: Whether students have mastered the foundational knowledge and skills needed to succeed at UC. When we judge students against that standard, two truths become evident. First is that the pool of students who are qualified for and can succeed at UC is far larger than UC can accommodate; the chief advantage of a criterion-referenced standard is the greater scope for UC to select from a broader, more diverse pool of qualified applicants. Second is that expanding eligibility is much less a priority than increasing actual enrollment and participation rates among the pool of those who are already qualified.

**Keywords:** University admissions, eligibility, access to higher education, California Master Plan, standardized tests

The Regents' recent decision to eliminate the SAT/ACT as a requirement for undergraduate admission to the University of California (UC) left several important questions unanswered. Without the additional "data point" that standardized test scores provide, how will admissions officials manage the huge volume of applications that UC receives? Are there other tests UC might use for this purpose? How will UC's decision to reject the SAT/ACT affect

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the viability of Common Core, standards-based exams in California's public schools? And without norm-referenced tests like the SAT/ACT, how will UC determine whether applicants are *eligible* for admission by virtue of ranking within the top 12.5% of California public high school graduates?

Some answers have begun to emerge. The first admissions cycle after elimination of the SAT/ACT produced the most diverse and high-achieving admit pool in the university's history. Apparently, the other thirteen selection criteria that UC employs, besides tests scores, were sufficient to the task (Clark, 2021). Regarding possible use of other exams, a university task force has rejected both the option of UC developing its own admissions test and that of using California's K-12, Common Core exam, Smarter Balanced, for this purpose. The task force left open, however, the possibility of reconsidering Smarter Balanced at some future date and seemed persuaded by the argument that UC admissions tests should align, wherever possible, with exams employed in California's public schools (Academic Senate, 2021).

Yet the question of how to replace the SAT/ACT in eligibility remains less clear as of this writing. UC's Board of Admissions and Relations with Schools (BOARS) has proposed and the Academic Council has approved a new "Eligibility Index" that replaces SAT/ACT scores with number of "a-g," UC-required courses taken in high school (Academic Council, 2021), but this is almost surely a stopgap solution for reasons that will become clear later in this paper.

Eligibility is a policy construct unique to California. UC and CSU are the only US universities that distinguish between eligibility for admission and admission itself and set separate requirements for each. The eligibility construct derives originally from California's 1960 Master Plan for Higher Education, which famously mandated that UC admit students from the top 12.5% (and CSU from the top 33.3%) of California public high school graduates (Douglass 2000). Thus began a long and twisting saga of policy implementation that has become increasingly convoluted over time. UC's decision to eliminate the SAT/ACT in university admissions presents an opportune moment to rethink the eligibility construct from the ground up.

The following essay describes the challenges over time of defining and monitoring the 12.5% eligibility pool: introduction of the SAT as an eligibility requirement and creation of the "Eligibility Index" in 1979; a brief history of UC "eligibility studies" from 1979 to the present; growing criticism of the eligibility construct after Proposition 209 took effect in 1998; the eligibility reforms of 2001 and 2012; and the limitations of the eligibility rate as a measure of undergraduate access to UC.

The essay concludes with three proposals: (1) eliminating the now-antiquated Eligibility Index, a mechanical algorithm that is increasingly at odds with the thrust of UC admissions policy over the last two decades; (2) moving from an eligibility-rate target (the percentage of California high school graduates who qualify for UC) to a participation-rate target (the percentage who actually attend); and (3) redefining eligibility as a criterion-referenced rather than norm-referenced construct.

## ORIGIN OF THE ELIGIBILITY INDEX

Until the early 1970s, maintaining a "B" average in academic subjects in high school was sufficient to place one within the top 12.5% of California high school graduates and thereby ensure admission at most UC campuses. But as UC admissions became more competitive, the distinction between *eligibility* and *admissions selection* emerged. Under that distinction, being UC-eligible meant that one was minimally qualified for admission to the UC system, if not one's first-choice campus, by virtue of ranking within the top eighth of California high school graduates. Admissions selection involved more rigorous academic requirements (sometimes called "competitive eligibility") and referred to the selection process at campuses that had more UC-eligible applicants than spaces available.

The emerging distinction between eligibility and admissibility coincided with a more prominent role for the SAT and ACT. Compared to many other selective institutions, UC had been slow to adopt the national exams. Initial studies by BOARS showed that the tests had only marginal validity in predicting student performance at UC, leading the committee to reject the tests. But the growing volume of UC applications that Clark Kerr and the Master Plan architects had foreseen would soon tip the scales in favor of the SAT/ACT.

Starting in 1968, UC required freshman applicants to submit test scores but used them largely for diagnostic purposes rather than for eligibility or admissions decisions. Test scores were used for an alternative admission path, “special action,” and for out-of-state students, but these comprised a very small fraction of students (Douglass, 2007). UC’s first large-scale use of test scores was for eligibility.

UC began using the SAT/ACT as part of its eligibility requirements in 1979, following a 1976 study by the California Postsecondary Education Commission (CPEC). Because some California high school graduates who are eligible for UC do not apply, the State has needed to conduct periodic surveys of high-school seniors in order to monitor UC’s eligibility requirements and ensure that they do not capture a pool in excess of its 12.5% Master Plan target. From 1976 until its demise in 2011, CPEC performed this function.

The first CPEC eligibility study, for high school graduates in 1976, showed that the GPA requirement for UC eligibility then in place was capturing almost 15% of the state’s high school graduates, well above UC’s 12.5% target. Rather than tighten GPA or course requirements, BOARS chair Allan Parducci proposed an “Eligibility Index,” combining grades and test scores, to address the problem. The Index was an offsetting scale that required those with lower GPAs to earn higher test scores, and *vice versa*. The effect was to extend a minimum test score requirement to most UC applicants. The Index was controversial because of its anticipated adverse effect on low-income and underrepresented minority applicants, and it was narrowly approved by the Regents in a close vote (Douglass, 2007: 116–117).

Since 1979, the Index has undergone more or less continuous recalibration and modification. For example, below is the version of the Eligibility Index that the author, then a staff consultant to BOARS, helped create in 2001. The test score minima represent the student’s total score on the SAT/ACT plus the three SAT Subject Tests then required by UC. Based on regression analysis of the performance of prior UC freshmen, the standard employed in developing the Index was that, for any combination of high school grades and test scores, there must be at least a 70% probability that the student would achieve a 2.0 GPA or higher at UC during their freshman year.

**Figure 1**  
**2001 UC Eligibility Index**

High School GPA in A-F Courses	Test Score Minimum
3.50 and above	1560
3.45 to 3.49	1564
3.40 to 3.44	1576
3.35 to 3.39	1596
3.30 to 3.34	1624
3.25 to 3.29	1660
3.20 to 3.24	1704
3.15 to 3.19	1756
3.10 to 3.14	1808
3.05 to 3.09	1860
3.00 to 3.04	1920
2.95 to 2.99	1992
2.90 to 2.94	2080
2.85 to 2.89	2192
2.80 to 2.84	2320

One reason why norm-referenced tests like the SAT and ACT may have seemed a good fit for the Index is that eligibility itself is a norm-referenced construct, at least insofar as the Master Plan has been interpreted until now. The very notion of the “top 12.5%” implies a norm-referenced as opposed to criterion- or content-referenced standard. Rather than measure mastery of subject matter, both the SAT/ACT and the Index were designed to measure a student’s percentile rank within the overall distribution of college-bound seniors.

## THE “BRIGHT LINE” OF ELIGIBILITY

Despite its controversial origins, the Eligibility Index proved a resounding success, at least initially, insofar as it provided a precise operational definition of what former UC provost Jud King has called the “bright line” of eligibility (King, 2018:154). The Index was useful to three important constituencies: students, the State, and not least, the University itself.

For students, the Index provided a straightforward algorithm with which to calculate for themselves whether they qualified for UC. The Index helped moderate student demand, since students who were ineligible tended not to apply. Self-selection ensured that most applicants were qualified. The role of the Index in this regard would become even more important when, in 1988, UC adopted a policy guaranteeing admission to the UC system for eligible applicants, if not necessarily at their campus of choice (UCOP, 2019). Meeting or missing the bright line of Index-eligibility had high-stakes consequences.

For the State, the Index provided a way to monitor the university’s compliance with the Master Plan. Historically, UC’s budget from the State has been heavily enrollment-driven, and state policymakers have needed accurate information on UC-eligibility rates to forecast enrollments. The methodological details have changed over time, but most CPEC “eligibility studies” have followed the same general approach. A random sample of transcripts is drawn for graduating seniors in California public high schools, and the transcripts are matched with SAT and/or ACT data from the national testing companies. The matched data are then reviewed to determine how many students meet the Eligibility Index. (After Eligibility in the Local Context (ELC) was introduced in 2001, CPEC also began considering class rank in high school as part of its transcript analysis; ELC is discussed later in this essay). Finally, sample results are extrapolated to the population of California public high school graduates as a whole to produce an estimate of UC’s overall eligibility rate. Typically, most eligibility studies have found UC to be above its prescribed 12.5% target – sometimes well above -- and such findings have prompted the university to tighten the Index on a number of occasions. Six of the eight eligibility studies conducted by CPEC over the years produced this result.

Last but not least, the Index – and the eligibility construct generally -- served the interests of the University. Whereas the bright line of eligibility represented an enrollment *ceiling* for the State, it served UC as a *floor*. As the population of California exploded during the 1970s and ‘80s, the Eligibility Index provided the foundation for a budgetary framework under which enrollment growth drove State-revenue growth for UC. Based on the Index, CPEC eligibility studies drove UC enrollment projections. Based on projected enrollments, in turn, the student/faculty ratio determined the number of budgeted faculty positions for which the State would provide funding. The faculty salary survey pegged compensation of UC faculty to those at comparable research universities. The marginal cost-of-instruction formula established an overall level of funding that the state would provide per each additional student. Together, this budgetary framework helped drive the ascent of the University of California to become the premier public university in the world.

To be sure, much of this framework has now been dismantled following the recession of the early 1990s and accelerating with the Great Recession of 2008-09. CPEC is no more, the victim of a line-item veto by Governor Brown in 2011. The student/faculty ratio has sustained what appears to be permanent damage.

Still, it is important to bear in mind the role that the “bright line” of eligibility has played historically, not only in UC admissions but also with respect to UC’s State-funded budget. Any attempt to re-think the eligibility construct must preserve the possibility that UC might grow, once again, with the population of California.

## HISTORY OF UC ELIGIBILITY STUDIES

Despite the seeming simplicity and precision of the Index, estimates of UC’s eligibility rate have often proved problematic. Figure 2 displays results of the eight eligibility studies conducted by CPEC from 1976 until its demise in 2011.

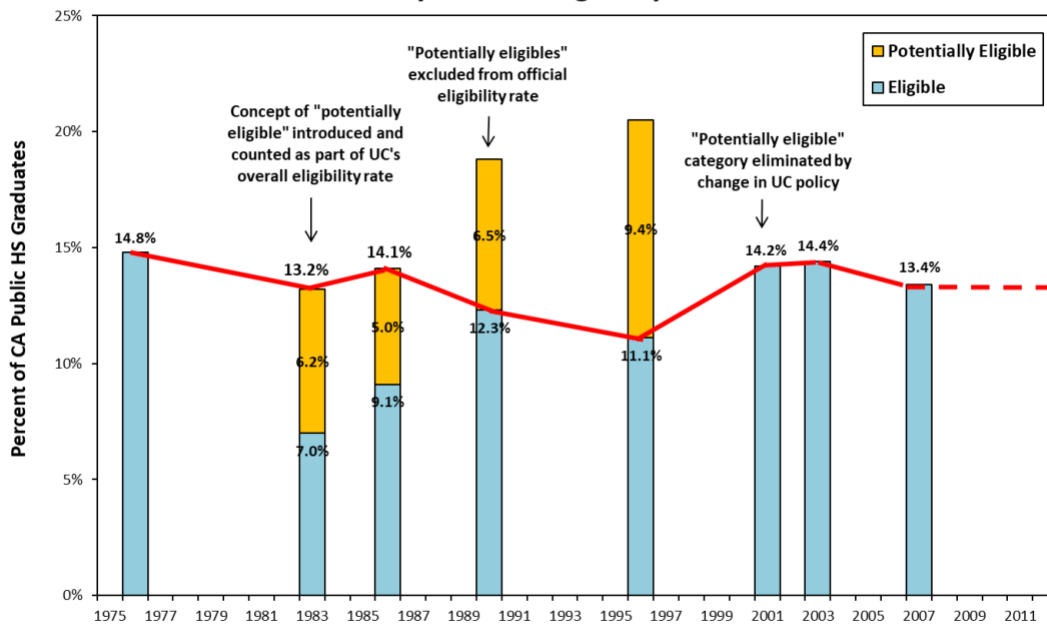
Because of their implications for UC’s State-funded budget, eligibility estimates have often been a bone of contention between UC and the State. In 1983, for example, CPEC’s preliminary findings showed that only 7 percent

of California public high school graduates appeared to be “demonstrably eligible” for UC, far below its Master Plan target. Another 6.2 percent were “potentially eligible”: They had completed all the UC-required coursework and achieved a sufficient grade-point average but had not taken all of the required tests. At UC’s urging, CPEC counted potentially eligible students as part of the overall UC eligibility pool in its final report (CPEC, 1985).

In 1990, however, CPEC found that 12.3 percent of graduates were fully eligible and another 6.5 percent potentially eligible, which together would have brought the overall pool to 18.8 percent. Again, at UC’s urging, CPEC reversed course and counted only fully eligible students as part of UC’s official eligibility rate, thereby deflecting criticisms from some in State government that UC’s budgeted enrollment numbers were too high (CPEC, 1992).

The “potentially eligible” issue was eventually resolved for good by a UC policy change in 2001, under threat from the State to cut \$11 million in UC enrollment funding. The root of the problem was that, while all UC applicants were required to take a battery of standardized tests to qualify for admission, scores on the tests were not actually used for applicants with high GPAs. Lack of a minimum test-score requirement for these students resulted in a sizeable pool of students who would have become eligible merely by sitting for the tests, whatever their score. UC’s solution was to introduce a minimum test-score requirement for applicants at all GPA levels, nominally eliminating the “potentially eligible” pool.

**Figure 2**  
**History of CPEC Eligibility Studies**



Source: California Postsecondary Education Commission.

The eligibility construct poses other measurement issues as well. Because the construct includes high-school graduates who are UC-eligible but choose not to apply, periodic random surveys are needed to estimate the overall size of the eligibility pool. This means that the eligibility rate cannot be measured in real time. It is often a year or more before results of eligibility studies are known, and the estimates are often out of date by the time they are published.

For the same reason, eligibility estimates are subject to various kinds of measurement error. These involve not only the usual error bands found in randomized surveys but other kinds of error as well. An example is CPEC’s eligibility study for the high-school graduating class of 1996, one of the few studies ever to report an estimated UC eligibility rate below 12.5%.

Yet the low rate reported in that year was almost surely the artifact of faulty methodology. Under the procedure followed at the time, researchers were required to merge high-school transcript data with SAT/ACT scores from the national testing companies using a “fuzzy” matching algorithm. That is, lacking unique student identifiers common to both data sets, researchers were forced to use information like first and last name, date of birth, school code, etc. In this particular year, however, school code was missing from much of the sample data.<sup>1</sup> It is likely that this omission accounts for the surprisingly low 11.1% UC-eligibility estimate reported by CPEC in that year.

### **GROWING CRITICISM OF THE ELIGIBILITY INDEX**

After Proposition 209 took effect in 1998, UC undertook a sweeping review of all admissions policies in an effort to reverse plummeting African American and Latino/a enrollments. That review shed a harsh light on the eligibility construct generally and the Eligibility Index in particular. While Prop 209 eliminated consideration of race and ethnicity in admissions selection, it had no effect on the Eligibility Index, which continued to be based solely on grades and SAT/ACT scores. It quickly became evident that low UC-eligibility rates were at least as much of a barrier to underrepresented minority admissions as Prop 209 itself. This was the one of the principal conclusions of a briefing paper prepared for an all-University conference in 2000:

Admissions policy is constrained not only by SP-1 and Proposition 209, but even more fundamentally by the construct of “UC eligibility” and by disparities in academic preparation that produce differential eligibility rates across racial/ethnic groups. Insofar as admissions are limited ultimately to the eligible pool, it is unlikely that changes in UC admissions selection criteria by themselves can produce an admitted class that approximates the racial/ethnic diversity of California high school graduates (Geiser, Ferri, & Kowarsky, 2000:7-8).

Projections showed that K-12 enrollment growth in California would be greatest precisely among those groups whose UC-eligibility rates were lowest. Contrary to the conventional expectation that, over time, UC’s eligibility pool would increasingly resemble the population of the state, these projections suggested the opposite: Underrepresentation of groups with historically low college-going rates would likely worsen, not improve, if eligibility rates remained unchanged.

These conclusions would lead to the introduction of a major new student pathway to UC eligibility in 2001: Eligibility in the Local Context. ELC was the first major reform of eligibility policy since the Eligibility Index in 1979 and in many ways was a reaction to that earlier policy -- in particular, the Index’s reliance on SAT/ACT scores as an eligibility requirement. BOARS’ adoption of ELC was based on research which showed that high-school grades not only had less adverse impact than SAT/ACT scores on underrepresented minority applicants, but also that they were the better predictor of student success at UC (Geiser & Studley, 2001; Geiser & Santelices, 2007). ELC extended UC eligibility to the top 4% of graduates from every California high school based on their GPA in UC-required, “a-g” courses, irrespective of SAT/ACT scores.<sup>2</sup>

ELC proved an immediate success. A first-year evaluation of the program showed that ELC expanded the UC-eligibility pool by approximately 2,000 new applicants, over half of whom were underrepresented minorities (UCOP, 2002).<sup>3</sup> Perhaps more remarkable, virtually all of the new applicants were high-achieving students who would have qualified under the existing Index, so there could be no question of “lowering academic standards.” The success of ELC was such that in 2012 it was expanded to the top 9% of graduates from each California high school as part of a larger package of eligibility reforms, which included dropping SAT Subject Tests and adding a new pathway to UC eligibility called Entitled To Review (ETR).<sup>4</sup>

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<sup>1</sup> Personal communication with CPEC research staff, 2001.

<sup>2</sup> UC still required ELC applicants to submit SAT/ACT scores, but the scores were not used in determining class rank in high school.

<sup>3</sup> See also the later re-analysis by Bleemer (2021), who found a somewhat smaller but non-negligible effect of “top 4%” policy based on a regression discontinuity analysis.

<sup>4</sup> The 2012 eligibility reforms were designed to reduce the percentage of students who were eligible based on statewide rank from 12.5 percent to 9 percent, while increasing the percentage of students who were eligible based on class rank in high school from 4 percent to 9 percent. Given significant overlap between these two pools, this left room for a third and smaller pool of applicants, ETR, who had fixed eligibility requirements but were to be identified based on local campus admissions criteria.

ETR also broke new ground in UC eligibility, if in a different way than ELC. For the first time in the Master Plan era, ETR created a pathway to regular admission *outside* the “top 12.5%” eligibility construct. Under this pathway, any California high school graduate who successfully completed UC’s entrance requirements with a 3.0 GPA or better was entitled to have their application reviewed, albeit without any guarantee of admission. While ETR admits were limited to about 2 percent of the pool, the new policy allowed UC to cast a wider net and select from a broader, more diverse, yet high-achieving group of applicants than was previously possible under the “top 12.5%” construct. “The goal of ETR is to expand the pool of applicants by removing the bright line of eligibility and capture talented students who had previously been declared ineligible for technical reasons” (UC Academic Senate, 2010).

ETR had its intended effect. In the first year under the new policy, UC had the highest application rate at any point in its history save for the years immediately following World War II when returning veterans flooded UC under the GI Bill – in 2012, more than one out of every five California high school graduates applied for admission to UC (Geiser, 2014:17).

Yet the 2012 eligibility reforms did not displace the Eligibility Index, which remained in effect and now functioned to identify the remainder of the UC eligibility pool who were Eligible in the Statewide Context (ESC). And because the statewide pool now accounted for a smaller share of the overall eligibility pool, the Index had to be tightened to become more selective, thus driving down the proportion of low income and underrepresented minority applicants who achieved eligibility via this pathway. Gains in diversity produced by other eligibility reforms tended to be offset by losses that resulted from tightening the Index.<sup>5</sup> The most recent UC eligibility study, for the class of 2015, found that just 3.2% of Latino/a and 2.7% of African American California high-school graduates were Index-eligible (RTI, 2017: 8).

The core problem concerns the validity and fairness of employing a mechanical algorithm like the Index to compare and rank applicants *without regard to context*. This is especially an issue for low-income, first generation, and underrepresented minority applicants, who are often at a disadvantage on numerical indices like SAT/ACT scores, “weighted” GPA, or number of a-g courses taken. Yet an SAT score of 1200, for example, is more of an achievement for a first-time examinee than one who received intensive test prep and has taken many practice tests. A transcript with a total of 50 a-g courses is more impressive for a student from a school with sparse a-g offerings than one from a school with a great many. Context matters.

UC’s introduction of comprehensive review in admissions selection in the early 2000s was intended to address this issue. Comprehensive or “holistic” review considers the totality of information in applicants’ files. Campus admissions staff who read files are trained to assess “achievement in context,” that is, to evaluate indicators of academic achievement in light of the applicant’s educational and socioeconomic circumstances.

Standardized tests and academic indices as part of the review process must be considered in the context of other factors that impact performance, including personal and academic circumstances (e.g., low-income status, access to honors courses, and college-going culture of the school). (UCOP, 2019:3).

The Eligibility Index is the antithesis of holistic review. Viewed against current campus procedures for admissions selection, the statewide Index appears a crude, antiquated relic. Replacement of SAT/ACT scores with number of a-g courses in the most recent version of the Index does nothing to resolve the underlying issue. Counting only the absolute number of a-g courses students have taken, without regard to the number of courses their school actually offers, creates a built-in bias against students from poorly resourced schools, where low-income and underrepresented minority students are disproportionately concentrated.

The contrast between the Eligibility Index and UC campuses’ nuanced procedures for admissions selection could not be more glaring. Whether it is even possible to design a numerical algorithm to rank order applicants with sufficient accuracy, reliability, and fairness to identify the “top 12.5%” is a question that must be asked.

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<sup>5</sup> See also Bleemer (2020:4), who found that later expansion of ELC from 4% to 9% had little effect on diversity.

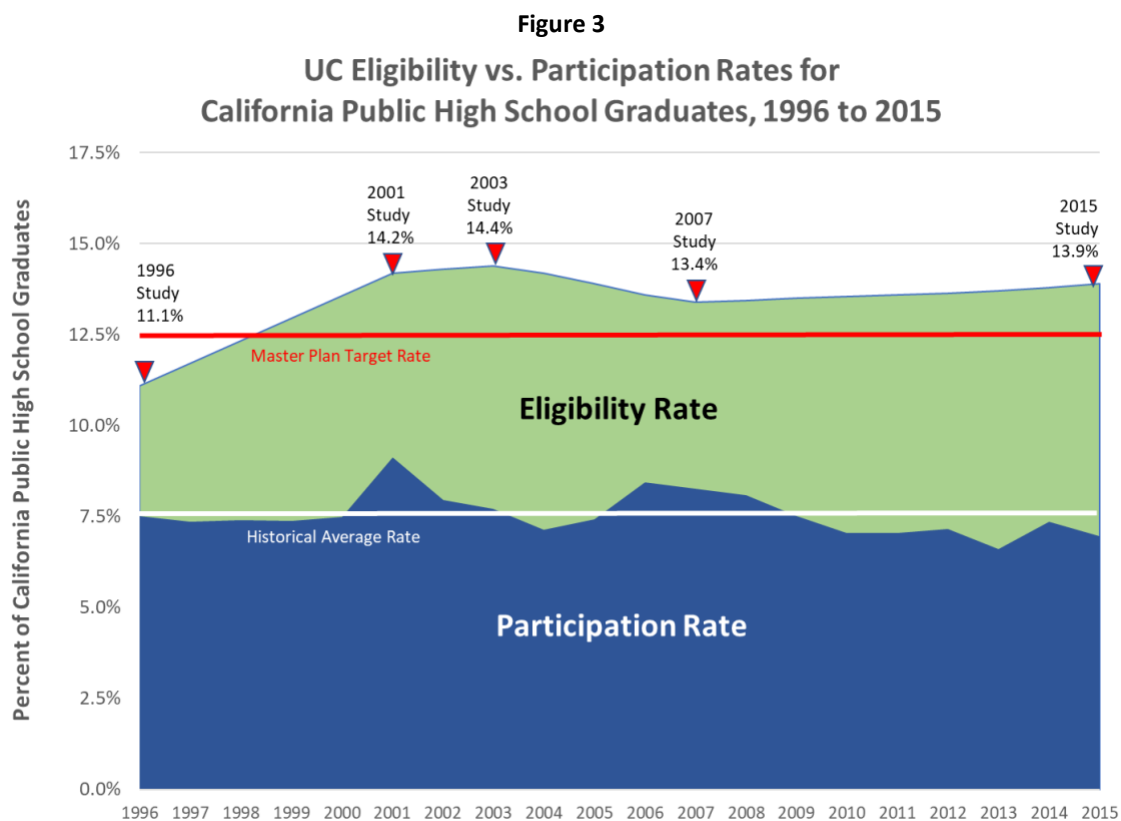


**LIMITATIONS OF THE ELIGIBILITY RATE AS A MEASURE OF ACCESS**

Given its evident measurement deficiencies, why has the Index endured for so long? The main reason is the key role that eligibility continues to play under California Master Plan. Even if only a rough approximation, UC-eligibility estimates have provided State policymakers a means to gauge student access to UC and monitor compliance with the Plan.

As it turns out, however, the eligibility rate is a poor measure of access. Figure 3 compares official estimates of the UC-eligibility rate with the *participation rate* – the percentage of California public high school graduates who enroll at UC – over the past 25 years. Whereas the eligibility rate is intended to measure how many students qualify for UC, the participation rate measures how many actually attend.

To those accustomed to the eligibility rate as the primary indicator of student access to UC, it is often a surprise that actual enrollments are so much lower than UC’s Master Plan’s eligibility target. Throughout most of the Master Plan era, the 12.5% eligibility target has yielded an historical average participation rate of 7.5%.



There are two main reasons why UC participation is so much lower than eligibility. First, some UC-eligible students do not apply. During the years when the author monitored enrollment trends at UCOP, we estimated that perhaps 15 to 20 percent of UC-eligible California high school graduates fell within this category, although there was no way to confirm that estimate with precision. Anecdotal evidence suggested that many in this category were high performers who had set their sights on highly selective private institutions.

The second and more important reason for the discrepancy between eligibility and participation rates is the growing volume of “no shows,” that is, eligible students who apply and are admitted to UC but decline admission and choose to attend college elsewhere. The number of no-shows has grown steadily over time until, for the first time in 2010, it exceeded the number who accepted admission to UC. More students rejected than accepted UC’s admit offer, in many cases because they were unable to gain admission to their first-choice campus (Geiser, 2014).

It is important to note that participation and eligibility rates do not always vary together. The last official eligibility study conducted on behalf of the State estimated that the UC-eligibility rate had risen slightly from 13.4% in 2007 to 13.9% in 2015 (RTI, 2017). Over the same period, however, the UC participation rate – reflecting severe cuts in State funding for UC in the wake of the Great Recession, leading to rising tuition and expanded nonresident enrollment – had fallen to historical lows not seen since the early 1980s (Geiser, 2014).

The difference between eligibility and participation rates assumes special significance in view of growing calls to expand access to four-year baccalaureate programs in California, including those at CSU as well as UC (Johnson, 2010; Geiser & Atkinson, 2012; Campaign for College Opportunity, 2022). Over the Master Plan era, California has absorbed the vast majority of postsecondary enrollment growth in 2-year institutions but has lagged at the 4-year level. In fact, California now ranks next to last among the states in the proportion of public college enrollments at 4-year institutions (Campaign for College Opportunity, 2021:40). This has contributed directly to California's low per-capita rate of baccalaureate production.

Though California's poor record of BA productivity is sometimes blamed on the failure of the transfer function, comparison with other state higher education systems suggests a more fundamental problem: California's 4-year sector is simply too small in relation to the size of its college-age population. Even after controlling for other differences such as per capita spending on higher education, states with larger 4-year sectors, where more students enter baccalaureate programs directly from high school, have much better records of BA productivity (Geiser & Atkinson, 2012:77-80).

To address this problem, some have called for raising the UC-eligibility threshold from 12.5% to 15% (and from 33.3% to 40% for CSU) (Johnson, 2010; Campaign for College Opportunity, 2022). But expanding eligibility is at best an indirect solution insofar as eligibility rates vary independently from participation rates. Increasing the UC-eligibility threshold, for example, might merely increase the volume of no-shows, thereby limiting any actual gains in UC enrollment.<sup>6</sup> Participation rates are a better measure of *effective* access for this reason. An added benefit is that participation rates can be measured in real time (yearly), based on readily available data from UC and the State.

### **BEYOND THE ELIGIBILITY INDEX: TOWARD A REDEFINITION OF ELIGIBILITY**

The above considerations argue strongly for eliminating the Eligibility Index and moving to a participation-rate target for student access to UC under the California Master Plan.

The Eligibility Index is premised on an assumption at odds with the thrust of UC policy on admissions selection over the past two decades: That it is possible to devise a numerical algorithm with which to identify a “bright line” between the “top 12.5%” or “top 9%” and other students; that this algorithm can be applied without regard to context or circumstance; and that the algorithm is sufficiently accurate to make high-stakes decisions about who is eligible and thereby deserving of admission and who is not.

Holistic or comprehensive review, on the other hand, is premised on the notion of *achievement in context*, the idea that academic indices like SAT/ACT scores, weighted GPA, or number of a-g courses cannot be taken at face value, but must be evaluated in light of the opportunities and challenges faced by the applicant. Though still controversial in some quarters, holistic review is essential to ensure that such indices do not unfairly exclude able applicants from disadvantaged backgrounds.

Yet the Eligibility Index lives on, the relic of an earlier time when SAT/ACT scores were employed at face value without regard to context. Though the SAT/ACT is now gone, the Index is not. It is time to retire this antiquated remnant of a less enlightened era in UC admissions.

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<sup>6</sup> Reber (2020) argues that the recent UC task force proposal to expand Eligibility in the Local Context (Academic Senate, 2021) would be largely ineffective for this reason.

Eliminating the Eligibility Index, however, necessarily raises questions about the broader eligibility construct that has guided UC policy on both enrollment planning and admissions throughout the Master Plan era. Without the “bright line” of eligibility, how will the State monitor UC compliance with the Master Plan going forward? How will UC ensure that admitted students are well qualified?

Although many variations are possible, the basic idea is this: *Using holistic or comprehensive review to select from among applicants who have successfully mastered UC subject requirements at a specified level of proficiency, UC would admit that number needed to yield a 7.5% participation rate among California high school graduates.* In effect, the proposal would extend the Entitled To Review model to all or most of the UC admit pool. The following paragraphs outline the rationale for the proposal with regard to both the Master Plan and UC admissions.

**UC and the Master Plan:** A 7.5% participation target is the same average rate that the Master Plan has yielded historically, so that it would produce the same level of actual enrollments, on average, as a 12.5% eligibility target. The conversion would be revenue-neutral with respect to State funding for UC. At the same time, like the 12.5% eligibility target, a 7.5% participation target would tie UC enrollment growth to growth in California high school graduates, thereby preserving the possibility of return to a “workload,” enrollment-driven State budget for UC at some point in the future.

As far as the State is concerned, in short, a 7.5% participation target would be functionally equivalent to the current 12.5% eligibility target. Given the discretion the Master Plan grants to UC to define its entrance requirements, conversion from an eligibility to a participation target might well be regarded a matter within UC’s purview, although it would surely require the State’s assent. The Master Plan’s eligibility targets of 12.5% and 33.3% for UC and CSU, respectively, are not set forth in any actual statute, leaving flexibility for the systems to define their pools and how they are selected (Douglass, 2011).

To be sure, fluctuations in budgeted enrollments are inevitable. Following recessionary periods in the past, the eligibility target has often helped UC restore budgeted enrollments to agreed-upon levels after State revenues rebounded; UC could and did argue that it would otherwise be forced to turn away eligible students. No budget agreement can ever be entirely recession-proof given UC’s precarious position in the discretionary portion of the State budget, but this is about as close as it gets. A 7.5% participation-rate target could potentially serve the same function.

Unlike the eligibility rate, however, a participation rate would provide State policymakers with a more meaningful and effective measure of undergraduate access. Across the US, four-year college enrollment is the single most important driver of B.A. productivity per population 18-to-29 years old. Moving from an eligibility to a participation target could help focus policymakers’ attention more squarely on California’s performance relative to other states on this key postsecondary indicator. This focus is especially important in light of current proposals to expand eligibility thresholds for UC and CSU (Johnson, 2010; Campaign for College Opportunity, 2022) and for specific programs such as ELC (Academic Senate, 2021). Expanding eligibility is an empty promise without actual gains in enrollment and participation rates.

Not least, compared to eligibility, participation rates are much less subject to dispute and more readily measured in real time, without the need for periodic sample surveys. As far as UC’s relationship with the State is concerned, participation rates offer an even brighter line than eligibility.

**Eligibility, participation, and UC admissions:** Two objections to a participation target can be anticipated with regard to its potential impact on UC admissions: That it might open the floodgates to an even greater volume of applications subject to holistic review, and that it would eliminate the guarantee of admission associated with the current eligibility construct. To a large extent, however, the train has already left the station on both counts.

Regarding application volume, in 2021, the first admissions cycle after the elimination of the SAT/ACT, the volume of (unduplicated) applications for freshman admission was the greatest in UC history, with over 128,000 applications from California residents and 203,000 in all. The number of California residents admitted in this cycle, 84,223, was also an all-time record. High-volume admissions employing holistic or comprehensive review is already a reality at

UC. Though undoubtedly more can and should be done to support them, campus admissions staff have demonstrated the capacity to manage the admissions-selection process without the crutch of the SAT/ACT (Clark, 2021).

Regarding the guarantee, ETR has already crossed that line in its willingness to consider a wider pool of qualified applicants, outside the “top 12.5%,” without any guarantee of admission. Nor would a participation target rule out preserving the guarantee for certain categories of applicants, such as ELC.

But the deeper issue is that the guarantee has lost much of its meaning. Despite the guarantee of admission that eligibility confers, a growing number of admits are “no-shows” who decline UC’s offer and enroll elsewhere. In the 2020 admissions cycle (the last for which final enrollment data were available at the time of this writing), of 79,567 California applicants who were admitted to UC, a record 41,640 – 52% -- were no-shows, in most cases because they were denied entry at their preferred UC campus and would not accept referral to UC Merced. When the majority of students now decline UC’s admit offer, it is difficult to regard the admissions guarantee as a meaningful marker of access.

Conversion from an eligibility to a participation target for purposes of budget and enrollment planning would not eliminate the role of the eligibility construct in UC admissions, but would redefine it. Rather than select from among the “top 12.5%” – a norm-referenced standard of eligibility – UC would select from the broader pool of California high school graduates who had successfully completed UC subject requirements at a specified level of proficiency – a criterion-referenced standard. The chief advantage of a criterion-referenced standard is the greater scope for UC to select from a broader, more diverse, and high-achieving pool of California high school graduates, while still complying with prescriptions of the Master Plan.

***Eligibility as a criterion-referenced construct:*** Twenty years ago, BOARS issued what was believed to be the first statement of principles by any US university on admissions tests (BOARS, 2002). That statement decisively favored criterion-referenced tests that measure student mastery of college-preparatory subjects over norm-referenced tests that measure students’ percentile rank among other examinees.

... [A] policy requiring [criterion-referenced] achievement tests reinforces the primary message that the University strives to send to students and schools (and that is embedded in the recent decision to adopt comprehensive admissions review for all applicants): *the best way to prepare for post-secondary education is to take a rigorous and comprehensive college-preparatory curriculum and to excel in this work* (BOARS, 2002:iii; italics in original).

Although BOARS’ statement dealt specifically with admissions tests, it is equally applicable to assessment of UC eligibility. Like the SAT/ACT, eligibility has been construed until now as a norm-referenced idea. But adoption of a 7.5% participation target would allow UC to “unlink” eligibility from its original, norm-referenced connotation, while remaining compliant with the intent of the Master Plan. Eligibility would be redefined as a criterion- or content-referenced standard: *Whether students have mastered the foundational knowledge and skills necessary to succeed at UC.*

When we judge students against this standard, two truths become evident. First is that the pool of students who are qualified to succeed at UC is far larger than UC can accommodate. The guarantee of admission conferred by the older eligibility construct is no longer tenable for this reason. The most that can and should be guaranteed is the opportunity for qualified candidates to have their applications considered under campus holistic review procedures.

Second is that eligibility – in the content-referenced sense – is not the problem. The problem is how to expand UC participation rates among those who are already qualified.

In *Crossing the Finish Line*, the late, great Bill Bowen was one of the first to highlight the extent of *undermatching* in public higher education, that is, students attending colleges whose entrance requirements are less demanding than they are qualified to attend. Based on a massive sample of students at 21 state flagship universities and four state higher education systems, Bowen and his colleagues found that more than 40 percent of students whose

qualifications would have placed them in the top ten percent of applicants at state flagship universities enrolled instead at less selective 4-year or 2-year institutions, and some did not attend college at all. The pattern was especially pronounced among low-income and underrepresented minority students. Counterintuitively, however, undermatched students had significantly *lower* completion rates than comparably qualified students who attended a flagship campus.

This finding has important implications for higher education policy since, as the researchers conclude, the national rate of baccalaureate attainment could be substantially improved if undermatched students began at colleges and universities for which they were qualified (Bowen et al., 2010).

The national pattern of undermatching has special salience for California. Of all the states, California ranks next-to-last in the proportion of public college enrollments at the university level. Although it is not possible to estimate the proportion with precision, it is evident that a sizeable fraction of California college students are undermatched, and it is not surprising for that reason that B.A. productivity per population 18-to-29 years old is so low.

The State urgently needs to expand four-year enrollment capacity at UC and CSU in order to expand B.A. attainment among the population of Californians now reaching college age. Expanding eligibility is much less a priority than increasing actual enrollment and participation rates among the larger and more diverse pool of those who are already qualified.

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