

**AD HOC COMMITTEE ON INTERNATIONAL ADMISSIONS TESTING REPORT
ADVOCACY & OUTREACH/INTERNATIONAL ACAC
MAY 1ST, 2019**

COMMITTEE:

Gary Clark, UCLA

Brendan Graham, Northeastern University

Bridget Herrera, American International School of Dhaka

Erick Hyde, University of Pennsylvania, English Language Programs

Laura Kaub, Nova Pioneer Schools

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Keith Light, Yale University

Jose Olavo de Amorim, Colegio Bandeirantes

Anne Richardson, The American School in London, CHAIR

Kathleen Schultz, Dulwich College Shanghai

HISTORY & CHARGE:

This committee was created in June, 2018, for one year, under the auspices of the Advocacy and Outreach Committee, chaired by Lucien Giordano, of International ACAC. Its charge was:

1. To facilitate communication among International ACAC members, NACAC/IIC (now Global Engagement Committee) leadership and testing agencies regarding international testing
2. When necessary, to act as advocates for the counseling and university constituencies regarding international testing
3. To conduct research as needed for specific testing issues as they arise

The committee members communicated primarily via email and phone amongst themselves, and with the international community via email, phone and social media.

The international counseling community were encouraged to reach out to the committee with issues and stories (see addendum). Strong links were developed with ACT and the College Board in an effort to facilitate quick communication of issues to those administrators who could escalate problems quickly to the right people in order to bring about speedy resolutions. In many cases, particularly with the ACT, issues were addressed and some resolutions found.

OVERVIEW:

The academic year 2018-9 was an interesting year in international testing for US college admissions, and for US college admissions in general. Key events included:

- The ACT rolled out a new CBT administration internationally in September 2018. The rollout was quick, uneven, and occurred over the summer when many schools were closed, thereby making things more complicated. CBT test execution has continued to suffer technology problems, administration and test center issues throughout the year.
- The SAT continued to suffer security breaches, beginning with the August US administration and concluding most recently in the Middle East in March. What was notable about the August administration was that the security breaches directly affected the August US domestic administration rather than an international testing administration.
- The College Board announced the addition of an August administration internationally to begin in August of 2020 and the removal of the November SAT Subject administration date in 2020. SAT Subject Listening Tests were moved to June only. In order to facilitate this, there will be no SAT Subject Listening Tests administered internationally in 2020.
- At the NACAC Assembly in September 2018, the Assembly spent much time enlightening the delegates about the lack of equity and access in international testing and subsequently passed an International ACAC motion asking NACAC for a new commission on testing. The committee sent a letter (attached) to the NACAC Board in November reiterating the need for this commission.
- The so-called Varsity Blues US admissions scandal in March 2019, focused attention and may bring additional scrutiny to students who apply for accommodations and/or who travel to other locations to take tests. This, combined with the August 2018 “cheating” scandal, may make it difficult for international students to travel to the US to take tests.
- The UC admissions offices issued a letter of concern (attached) about equity and access in testing for international students in September 2019, and is considering the role of SAT/ACT in admission.
- ACT added an international July test date for 2019.
- Duolingo’s test of English proficiency (the DET) emerged as an alternative to or replacement for TOEFL. This movement has continued to grow and Duolingo expanded their operations significantly in early 2019.
- The continued fast-paced increase of institutions adopting a test-optional or test-flexible approach, in addition to the rise in self-reported score reporting.

# Domestic vs. International Testing Dates	SAT	SAT SUBJECT	SAT SUBJECT w. LISTENING	ACT
# Domestic Test Dates 2019-2019	7	7	1	7
# International Test Dates 2018-2019	4 (October, December, March, May)	6 (November and June Subject Test only)	1	6 (no July)
# Domestic Test Dates 2019-2020	7	7	1	7
# International Test Dates in 2019-2020	4	5 (November and June Subject Test only, no March admin.)	1 (no November test date in 2020)	7 (added July)

COST	SAT	SAT w. ESSAY	SAT SUBJECT	ACT	ACT w. Writing
Domestic	\$47.50	\$64.50	\$22/test	\$50.50	\$67
International	Additional \$43-53 depending on region Additional \$24 for certain test centers	Additional \$43-53 depending on region Additional \$24 for certain test centers	Additional \$43-53 depending on region Additional \$24 for certain test centers	\$150 plus	\$150 plus

The most pressing issues regarding admissions testing for international students and US citizens abroad continue to be:

- **Access**
- **Equity**
- **Test Security & Reliability**

Access

- Those abroad do not have the same access to testing as those testing within the U.S. in terms of access to test centers/no. seats, cost of testing, the cost of transportation logistics, and test dates.
- The move to the CBT ACT (which caused many school-based test centers to close and large centers to be centered to major cities only) and the SAT security breaches (resulting in mass test cancellations) have made these tests less accessible.
- Test fee waivers are available to domestic students, but not international students.
- There will be no SAT Subject Listening Tests offered in 2020.

Equity

- Students testing inside and outside of the U.S. should be able to sit for the same number of tests, with similar timing/spacing.
- Taking the ACT as a computer-based test outside the U.S. vs. paper-based inside the U.S. is an equity issue. We won't know reliably how the scores compare until a couple years of results have been collected, which means that international students may have an advantage or disadvantage yet to be identified.
- The cost of the test itself (which is higher for international students than for domestic students taking the same test) creates a barrier for most international students.

Test Security and Reliability

- Test security and score reliability are major concern. The constant security breaches, test cancellations, and score cancellations bring the reliability of the tool into question. As long as the College Board continues to reuse tests this will continue to be an issue. If the test is constantly compromised, how can any scores be considered reliable, regardless of where the test is taken?
- International students, esp. from China, have been stereotyped as cheaters.
- Rising average scores indicate that the tests are becoming more and more coachable – and therefore less and less reliable as a measure of whatever they were meant to measure in the first place. Since the tests are completely foreign and few students can afford the costly test prep needed to become familiar, this significantly disadvantages low-income (as well as domestic) international test-takers. Free online test prep is not the solution: most students around the world can't afford the data for such lengthy

internet access. It's also not accessible to students who don't live in national capitals or major cities, adding on the cost of transport and accommodation - more barriers for most students.

Other testing issues under discussion in higher education and in international schools:

- The UC system is considering the role of SAT/ACT in admission.
- The growing use of self-reported scores as a way to increase access and equity
- Testing with accommodations:
 - the ease of which accommodations are given out
 - those with means have greater access to the ed/psych testing necessary for accommodations
 - the perceived/real cultural stigma of testing that prevents some students from seeking accommodations
 - the cheating scandals, leaked tests, cancelled scores with no good explanation, and a widely held general impression that the whole standardized testing industry is an American scam.
 - growth of the test-optional/flexible movement vs. academic context for some applicants where there is less confidence in the rigor of the academic program or the degree to which their transcript reliably reflects their academic potential.
- Clarity needed in test-optional movement:
 - Test optional is often test optional for some, frequently excluding international students, particularly those educated in their national systems.
 - Test optional is a maze for international students, which is a major barrier. A lack of understanding about test optional might not slow its growth, but will slow the rate at which international students (especially those who lack counseling) take advantage.
 - One of the barriers is the perception (and in some cases reality) that those who submit test results may be advantaged over those who do not.
 - Until the Ivies or UCs do away with standardized testing, the conversation will continue as to why and why not go test optional.
- Misuse of scores:
 - There are still too many universities mistakenly using SAT/ACT scores, for example, as a supposedly fair assessment of English fluency.
 - Too many institutions tie merit-based financial aid to test scores.
- Lack of data:
 - There is not enough data about testing coming from organizations beyond the ACT and the College Board.

- Varsity Blues:
 - This recent scandal brings score reliability further into question. Every time someone comes up with a new way to game the test/ beat the system/ outsmart the test makers, it casts a shadow of doubt on all the test scores.
 - The scandal will bring increased scrutiny on those with accommodations. It has highlighted the tacit understanding that accommodations can be obtained by those with low level of need demonstrated.
 - The scandal reinforces the perception among international students and families that these tests are a scam and something only the rich can game. “It has been happening for years.” has been a common comment.
 - More institutions may look into going test optional and perhaps the doors will open for true test reform, a la Duolingo.

RECOMMENDATIONS:

We recommend that International ACAC and NACAC work together to:

Immediately:

- Honor the Assembly vote and establish an international commission to examine the use of testing in U.S. college admissions with respect to access, equity and use in admissions for all students, domestic and international.
- Advocate with the testing companies for access and equity in testing for international students and U.S. citizens abroad with respect to:
 - Sites & Seats
 - Dates
 - Costs
 - Accommodations
- Advocate with university administrators and policy-makers regarding current testing issues and barriers facing international applicants and U.S. citizens abroad.
- Advocate for self-reported testing being accepted for all in the admissions process.
- Address the ongoing security issues with the testing companies, specifically the reuse of tests.
- Alert and educate the entire NACAC community as to these issues. Help the entire NACAC community understand that what affects international students affects everyone.

Longer term:

- Establish recommendations on global access and equity in testing.
- Establish and fund independent studies regarding:

- the reliability of testing in predicting university readiness and success and the role and use of testing in admissions decisions
- the validity of test optional and test flexible policies for international applicants
- alternative testing policies and feedback that can be gained by students' potential through other new technology resources.

The committee worked hard to generate communication about these issues around the globe and within their constituencies and spheres of influence. They also worked with the College Board and ACT to try and facilitate good communication, and many issues were addressed as a result. They are owed a great debt of gratitude from all.

Respectfully submitted,



Anne KW Richardson, Chair

Attached:

Addendum

UC Letter

NACAC Letter

International ACAC list of issues

HALI Network list of issues

ADDENDUM: ISSUES SHARED**

** this is not a comprehensive list of all the issues that occurred, merely ones shared with the committee. In addition, files generated by International ACAC and HALI Access Network attached, and more issues are outlined in the various counselor groups on FB.

Country	SAT or ACT?	Issue
Indonesia	ACT	<p>We had twin senior girls experience the issue of registering for the Jakarta British Council test site only to find out via the print registration form that they were now registered to take the ACT in a whole other town and city! Luckily, mom had a screen shot of the original registration ticket which listed Jakarta as the location. But the worse part was after many calls to the US office, to the ACT office here, and a variety of emails, the ACT folks handled the whole issue appallingly. Even when pleas were made to high level staff, no one would take responsibility or make a decision to rectify the situation. When I worked at the College Board as the international person, had I received an issue of this level and magnitude, I would have (and with the support of higher ups) corrected the issue immediately! Sadly this was not the case. It took calling and finding a customer service rep who took pity and tried to expedite a solution. After this debacle, I said that I could no longer encourage or support students taking the ACT here in Jakarta. If they wanted to register for it and take it here in Jakarta, we advised them to do so at their own risk.</p>
Indonesia	ACT	<p>"During the time when <STUDENT> was taking her test, a technical glitch occurred. While she was answering questions in the Science section of the exam, she clicked the ">>" button along the bottom row that listed the numbers of the questions. When she did so, an additional tab showed up on the top of the screen and brought her to the Writing section when she hadn't finished her Science section. When <STUDENT> raised her concerns to the ACT invigilator present, the staff returned to the original tab and the Science section was shown to be completed (keeping note that she had around 15 minutes remaining). When returning to the tab with the writing section, the timer had apparently begun already, thus wasting time <STUDENT> could have spent doing the writing section. The ACT invigilator called tech support and was able to put a pause</p>

		<p>on my daughter's test through the proctor's computer. They did try to get <STUDENT>'s test working again, however, after an hour of trying, they were not able to restore <STUDENT>'s Science exam. <STUDENT> waited till the other candidates in the room had finished their exam before the invigilator and staff at <TESTING CENTER LOCATION> tried the other computers. Even with tech support and a new computer, they were not able to restore her exam."</p>
UK	ACT	Students relocated to another test center without warning one week before the test.
UK	ACT	Student's ACT froze during admin and could not be unfrozen. Student offered a free administration but no retest. Lost one testing opportunity
UK	ACT	Afternoon testing session cancelled by ACT and school was blamed for cancellation
	ACT	<p>Only had one student attempt to take the ACT this year. She registered, had her registration canceled the day before the test because it was supposed to be a closed center, was not told she would have the chance to make it up but got contacted out-of-the-blue for a makeup test, which she took, and then...never received her scores. The ACT told us that it was an IT problem and they were looking into it--but three months later it is still unresolved and she had to withdraw her app from universities who weren't able to waive the requirement. An apology would have at least made us feel like there was concern for her case, but I had the distinct impression that the customer service representatives had been trained not to apologize. I suppose there must be business research that says apologizing leads to a worse outcome for a company but man, it is really annoying.</p>
Middle East	SAT	SAT cancelled in Middle East in March due to security breach
US/China	SAT	<p>Help! I have a student from China who has been through the ringer. She came to the US for high school in 11th, the school announced it was closing in April. She is now at my school in the Boston area. Grades are not super great, due to a lot of difficult personal situations outside of her control</p>

		<p>in 11th. She took the SAT in August, the College Board canceled her scores. She took the October test, and of course, they have delayed her scores. Other students, including some of our Chinese students who took it at the same location, but not the same classroom, have received their scores. We're looking at test-optional schools. I've encouraged her to take the ACT in December, even though she has spent over 200 hours doing test prep for the SAT and I am not optimistic she will do super well on the ACT. Her practice SATs project her in the 1400+ range. To have the best options because of her grades, she really needs test scores. Any other advice? I'm pretty enraged at the College Board, seems like they are unfairly biased against her, and every phone call with them is fruitless.</p>
US/China	SAT	<p>Of the several dozen August 25, 2018 SAT score cancellations that have been reported to FairTest, the majority involve international students with Asian-sounding surnames who are enrolled in U.S. schools and studied for the exam with Chinese test-prep firms. In none of these cases has the College Board provided the student or his/her school any evidence for why they are refusing to report test scores. Nor have test-takers been allowed an appeals process in which they can provide information about why their scores are valid, as is normal in other challenged score cases. Once again, the testing industry's position is "Trust Us," demanding a form of blind faith that is not justified by their track record on test security or "customer service" (sic)</p>
UK	ACT (Dec)	<p>Alexander flew to FIS to take the test due to a severe lack of capacity for ACT with accommodations in the UK. He is using the ACT to apply to IE, Bocconi and ESADE universities in Europe. Bocconi have a hard deadline for testing to be completed of January 17th, so this was his last opportunity to take the ACT.</p> <p>Unfortunately, it seems as if PSI assigned Alexander a non-accommodations test: while he was working through the first section, the test timed him out at the regular time instead of allowing him extra time. On contact ACT, the test supervisor was told that there was nothing that could be done. I attach photos of the test supervisors report and comments to this email.</p>

		<p>Alexander's father, John, who had accompanied him to Frankfurt, contacted ACT customer services, and I attach his recount of these conversations.</p> <p>I am writing to request that a special circumstances is made here: Alexander has pursued this testing plan in good faith, to use the ACT to access these universities and avoid the disruption that would be required by taking separate tests for Bocconi, IE and ESADE. He has made additional effort to travel to another country to take the test, only to find that these efforts were in vain through not fault of his, or the test center's, making.</p> <p>Though I know that ACT can offer paper-based testing in school, or the February test, neither of these would be acceptable to Bocconi. A paper-based test would not be able to be approved, sent, administered or marked before January 17th (even without the upcoming holidays), and the February test is too late.</p> <p>It does not seem out of order here for ACT to send a one-off ACT to a PSI center in London or nearby in these circumstances: I understand that the technology is there to do this, and it would help make up for the very difficult situation that Alexander has been placed in here. I have also been in contact with Pat Coates about this issue, and I include him in copy as I am certain that he would know which test centers in the UK would be able to provide this make-up test next Saturday.</p> <p>I'm afraid that the family are deeply upset about this situation and are preparing legal action, which I do hope can be avoided with a proactive response at your end.</p>
Spain	SAT & ACT	<p>ASV is not currently a test center for ACT due to the online ACT not being compatible with all computers (students use Chromebooks)</p> <p>There are only 4 test centres in Spain: two in Madrid, one in Barcelona and one in Tenerife (Canary Islands, 4 hours by plane from Madrid)</p> <p>Our school is closed in August, therefore our students have only 2 dates to test before Christmas: October and December. We miss the date options that ACT offers and</p>

		<p>the kind of exam, which is different to the SAT. Some students do better in the ACT than in the SAT.</p> <p>We wish they had waited to offer the online version until their software was open to every kind of laptops/ computers.</p>
Greece	ACT	<p>I had two students affected by administrative issues who were unable to register.</p> <p>One student had a great deal of trouble with the new international account, re-registered but was never able to register for the October test date, having been denied entry multiple times. She was abroad and was unable to communicate vis the helpline.</p> <p>Another student had applied for accommodations, the paperwork had not been processed by the test date and she was unable to even take the exam because of this. She spoke to the ACT helpline and wanted to take it without accommodations, but was told that it was impossible. She has been left with no test to offer for early applications. She will now be taking the October 27th test and will also try to take the SAT on a stand-by basis.</p> <p>The amount of added stress to this process is incredible, especially with the change over to CBT testing and the new registration system. International students have truly been isolated by ACT's choice to make them experiments for the CBT.</p>
Egypt	ACT	<p>They cancelled the test and refunded the credit cards to our test takers without even telling us what was going on.</p> <p>They will offer our students a retest but they may not offer it at our site.</p> <p>That does not make sense to me.</p> <p>ACT outsourced their vetting process to ConnecMe who gave CAC wrong information.</p> <p>However, ACT will not follow up with ConnecMe about this issue and will onto tell CAC we have to follow up with ConnecMe.</p> <p>This makes ACT look bad but also CAC. I can't get anyone on the phone who will listen to my concerns, and if we have to continue to work this this third party for the vetting</p>

		<p>process, it seems like ACT is not even training them well enough to get us set up properly. That is the whole reason our test was cancelled is that ConnecMe did not communicate the specifications accurately during the readiness test. They approved our readiness and then on the test day we were told we were not compliant.</p>
China	ACT	<p>During testing today, one computer had a malfunction and I was unable to pause the exam from my proctoring station. The student lost 7 minutes of time on test 2. I followed ACT procedure and called the number given. After 17 minutes on hold, the call was answered. After transferring back and forth for over 1 hour, the PSI level 2 technician told me that the pause feature had been disabled from this test sitting for all international locations, without telling us or PSI. It was on order from the ACT. Meaning that any problem that occurred on the very first sitting of the test, there is nothing we could do to pause the test, despite being trained to do so.</p> <p>This is absolutely appalling. No offer of a free test in the future makes up for this, for the student or for myself and my technician trying to solve problems on test day. It is really unbelievable to me.</p>
Brazil	ACT	<p>It would be wonderful if the ACT could find the time to contact international schools with the names of the students who will be re-testing on September 29. After a global fiasco of CBT on September 8th, direct communication from ACT to international schools has been, at best, less than forthcoming.</p> <p>With less than a week to go until the re-test date and hundreds of international counselors headed to Salt Lake City, I am yet to receive a list of students who are scheduled to re-test. ACT's online roster system notes that our school is not scheduled to have a re-test session. Our IT department has yet to hear from anyone at ACT regarding re-testing information, albeit having received several emails and phone calls regarding the October test date. Nonetheless, one of our students has received confirmation that he is retesting. Where is he retesting? When is he retesting? Is direct email communication with an</p>

		<p>international test site coordinator a foreign concept to ACT?</p> <p>What are international students hoping to apply EA or ED1 to do given the breakdown in communication on the part of the ACT?</p>
Ethiopia	SAT	<p>It is SAT day, so I dread answering my phone when our school's testing coordinator calls me. Sure enough, one of my SSD students who had tested in August in the U.S. got the exact same test today in Ethiopia. Thank goodness he was honest, but I am wondering if this is an isolated incident or more of the same. I am assuming that an alternative will be worked out, but this should not be happening... students are mobile and no assumptions can be made when recycling tests.</p>
China	SAT	<p>I am not sure what is going on in the system but we had some issues again this weekend with communication to the site supervisor. I am and have been the supervisor at Dulwich College Suzhou (74366) now for two years. We have filed the form twice to make this change. On Saturday, no communication for the lock box came my way via mobile or via email – although Lucien our former site supervisor did receive communications.</p> <p>Additionally, the previous contact person that we had here in China who was responsible for sending the box code in the morning has now moved on from ETS and there was no handover or communication of this change.</p> <p>I am requesting your assistance in having a thorough look into our account to see what is going on and why this supervisor problem persists as well as the systematic lack of communication</p>
India	ACT	<p>FairTest received the following from a mother in India, who just called us. Her son, a boarding school student in the UK, had planned to take last Saturday's SAT near his home in Mumbai but received this email the day before the test. He is applying Early Decision to U.S. schools with November 1 deadlines, so is in a very bad situation.</p> <hr/> <p>From: ACT-Cares <act-cares@act.org></p>

		<p>Sent: Friday, October 26, 2018 2:02:45 AM To: _____ Subject: IMPORTANT NOTICE REGARDING YOUR OCTOBER REGISTRATION</p> <p>Dear _____,</p> <p>We regret to inform you that your scheduled test for October 27, 2018 has been cancelled. Please do not report to your testing center.</p> <p>After exhausting all options, we were unable to establish a reschedule date in your area. We deeply apologize for any inconvenience this has caused. To rectify the situation, we will refund the fees paid for your October registration. In addition, we will offer a free ACT test registration for any future test date. To take up this offer, please contact ACT Customer Care by replying to this email or by phone at, (319) 337-1993 or 800-525-6932.</p> <p>Once again, we sincerely apologize for this unfortunate situation and late notice.</p> <p>ACT Customer Care ref: _00D30Wu5. _5001B1EIdmt:ref</p>
Fairtest	SAT	<p>It is now 10:30am east coast U.S. time or 7:30am pacific on Saturday, November 3 and answers to many of today's SAT Subject Test questions are already posted on Reddit hours before west coast U.S. students take the exam (see, for example, the Physics II Subject Test discussion here -- https://www.reddit.com/r/Sat/comments/9ttqot/official_november_2018_sat_ii_physics_discussion/).</p> <p>By all accounts, the same questions are used on Subject Tests at all test sites around the world, so it is easy to see how some students could gain a huge leg up.</p> <p>Moreover, a usually reliable FairTest source in South Korea told us that some November 3 Subject Tests were available days in advance (apparently obtained from a few unethical test site administrators) for individuals (or "test-prep" companies) willing to pay thousands of dollars.</p>
UK	ACT	I have had a family try to register for the ACT with

		<p>Accommodations at a test centre and it looks like there are no test centres in the UK offering the test with accommodations. I know we have the paper-based test as an option but they are likely going to run into pushback from the school and the student feels that the computer based test would be better for her.</p>
<p>Thailand</p>	<p>SAT</p>	<p>I am writing to you as a last resort as I am at the end of my rope with SAT/Honoraria issues. I know that it is not either of your jobs to work with schools that are testing centers or with the new payment process. But I am ready to resign from being SAT coordinator and if need be my post based on issues with the system.</p> <p>I have repeatedly reached out to the Regional Rep and the Honorary email account but have had no success with them. I have still not been paid for the December or March test dates. With the May test looming, I am sure I won't be paid for that either. Other members of my staff still have not been paid either (although some have; one person paid twice for the same testing).</p> <p>I have sent multiple emails dating back as far as 29 January that have not been answered. As a matter of fact, no email I have sent to the honoraria2@ets.org have been answered. I get an automatic reply saying that an answer will come in a timely manner but that is only a joke.</p> <p>Please tell me what to do. Who can help me look into the account that I have set up for payment and let me know what I can do? There was a mix up (not the first time) with the check for the December test --in the past a check was sent to me for all our Thai staff along with my payment and I would pay them in cash. For some reason, in the last few months of 2018 there was some issue at ETS and the checks were screwed up. They never sent the check for December payment and then said it would have to be paid electronically through Western Union account. I have set that up and as far as I know it's ready but I have not received any payments and they have fail to reply to any emails that I have sent requesting clarification.</p> <p>I know you are going to say to call them but being 12 hours ahead of them makes this too difficult. First of all, I don't</p>

		<p>want to bear the cost (as I would have to call from my home at night) of what I think will be a very long phone call. Second, I don't want to start such a difficult call at 9 or 10 pm at night when I am exhausted. I have requested in previous emails for someone to call me during MY work hours and that request has never been addressed. Third, all of my material for the SAT are at my office and I don't want to bring anything I THINK they may want during the call home with me.</p> <p>I know this is a long and rambling email but I just don't know what else to do. I will not continue to be the SAT coordinator in the future given these problems are not resolved. That may mean that my school will not want to continue my employment but so be it. I am sick of the headaches and the frustration. If you can help in any way, I would be very grateful.</p>
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