

**CRDC's Critique and Recommendations on CUNY Reading Placement and Exit Testing**

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Over the past few years, CUNY's Reading Discipline Council (CRDC) has been working closely with CUNY's Central Office to create a new set of learning outcomes and to develop a new test based on those outcomes. These were done with thorough research, expert opinion, and faculty input. Our council members have been laboring diligently to improve the curriculum and set standards that prepare students for college-level reading and literacy across the disciplines.

The CRDC is deeply concerned, however, about the recent developments in the guidelines for implementing CUNY developmental reading standards and policies. The charge of the CRDC, in the spirit of shared governance, is to determine academic standards, assessment measures, and curricular changes geared towards the short and long-term academic reading needs of our students. We were startled by the Central Office's changes in placement standards, the implications of the proposed use of the ACCUPLACER reading test as one of the instruments which will determine exit from developmental reading, the process by which they were set, and the circumstances in which reading programs were required to implement them.

CUNY's recent decision on the implementation of multiple measures in developmental reading for the Fall semester 2016 was issued in contradiction to the timeline that had been given to our Council, without specific directions in May, 2016. That original timeline was set for the Spring Semester 2017. The fact that the memo was issued in mid-August, right before the start of this semester left faculty no time to revise curriculum and to develop assessment instruments to accommodate the drastic changes. What made the situation more confusing was that there were no resources provided to CUNY reading programs and related constituencies in order to facilitate this complete overhaul.

In fact, in our September Council meeting, we were informed that some reading programs were still using an old syllabus that included the ACT-COMPASS as the single exit measure! Our Council Chair and members have received numerous inquiries from other colleges and non-course-based programs about directions and ways to implement the imminent changes.

While reading program chairs and instructors were busy developing curricula and assessments to accommodate the changes in mid-semester, CUNY made another important decision about the placement cut score on the ACCUPLACER reading test, without prior notification and consultation with the Council. Not only are we concerned about the extremely low passing test score (55 out of 120), but we are also troubled by the way that the cut score was set. As in any other discipline, reading faculty members should continue to be given the opportunity to be actively involved in important decisions on academic standards, including curricular changes and assessment of non-course-based programs.

We must emphasize that it is the reading faculty, not the Office of Testing and Assessment, who have the credentials to determine academic standards in developmental reading. The recent changes in the implementation of developmental reading policies and standards revealed a disconnect between decision-making and implementation because reading faculty was not fully involved in the former. This is an infringement on academic/disciplinary practices which portends a corrosion of standards in developmental reading. The low placement standard in reading will only be detrimental to students who are underprepared for college reading.

Developmental reading courses are essential for equipping students to meet the requirements of college-level reading, critical thinking, and disciplinary literacy. It is ethical to ensure that students, who are in need of intervention at entry and at individually-varied points in their academic and disciplinary study, will have the opportunity to enroll in developmental reading, which appropriately prepares and supports them for protracted academic success.

For the first time in our history, the Reading Discipline Council, as an academic advisory body to the University, finds itself at a crossroads. Its members are being asked to disregard their academic judgment and endorse, as a compromise, a substandard assessment instrument for reading. Problematically, this decision would represent the position of the City University of New York (CUNY) on reading assessment for placement and exit testing, as of spring 2017.

### **I. Rationale for CRDC's Critique of ACCUPLACER Reading Cut Score set by CUNY**

Research on cut scores of standardized testing is unambiguous. The idea of a placement test is to effectively identify those who are struggling and those that would benefit from remediation (Hughes & Scott-Clayton, 2011). In order for a placement test to function effectively, appropriate cut scores need to be offered.

Mattern and Packman (2009), for example, join many others in reporting that an effective ACCUPLACER score of 73-84 percent equates with success at a grade level of C or higher. Nonetheless, we are being asked to accept a cut score of 55 as opposed to the previous cut score of 70 on the ACT Compass exam, which was a reduction from CUNY's original cut score of 75 on the ACT. Bettinger and Long (2009) articulated the importance of appropriate placement of students into remediation. They found that students who completed the remediation sequence were less likely to drop out and more likely to matriculate.

In a more in-depth study, using a larger sample, Calcagno and Long (2008) found that students, who placed into developmental courses with one point below the cut score, found greater success in college level coursework than those students who passed the placement exams by one point over the cut score and entered credit bearing coursework. Both studies highlighted the importance of a significant and valid cut score that would effectively place students into varied appropriate programs, which would assist them in achieving overall academic success. We know

that a score of 55 falls far below the threshold that could offer some assurance that a student is prepared to meet the requirements necessary for success in the academic reading experience. That assurance is our ultimate objective.

Earlier, James (2006) found that as a result of application of a low cut score in English and Reading, the ACCUPLACER did not assure sufficiently accurate placement. The inappropriate placement resulted in low grade point averages for students who were inaccurately placed into higher-level English courses. History has shown us also that such a decision inevitably leads to students having to repeat many of their reading intensive academic courses. This, in turn, leaves them frustrated, promotes withdrawal, and extends time to degree completion.

Endorsing the proposed cut score would mean that we are complicit in the act of undermining the academic, socio-economic and personal life chances as well as other vital interests of our students. By so doing, we would be exacerbating at least one of the most significant problems that the Task Force on Developmental Education is trying to avoid.

Lowering the cut scores for students to meet the substandard performance from the pilot does not solve the underlying problem. Our students need semester-long DEVELOPMENT of academic and critical reading skills and deserve to have those skills assessed with a reading comprehension instrument that more adequately measures learning outcomes in reading. A hurried push into Freshman English Composition does not solve the reading problem. English Composition neither can guarantee nor substitute for developmental reading comprehension, which is specifically devoted to preparing students for reading-intensive content area courses.

**A. CRDC's Critique of ACCUPLACER and CUNY's Pilot Testing results:**

Both the classic and the Next Generation versions of ACCUPLACER Reading test do not cover key CUNY reading outcomes effectively; therefore, the test is deficient as both a placement and an exit tool.

- The ACCUPLACER is the antithesis of a good reading test as it offers no buildup of background knowledge from which students would be better able to make correct answer choices.
  - a. The passages afford students little context as would be needed for sound reflection on responses.
  - b. The passages are comprised of very advanced vocabulary housed in language that is, at times, dense with multiple embedded clauses.

- Many of the 1000 students that sat for the pilot test were upper-level developmental students who were half way through their semester, i.e., six weeks before their final exam; therefore, they were underprepared when they took the test. Consequently, the pilot test results did not reflect students' reading levels at the point subsequent to their having completed a full semester of intervention.

The pilot test of ACCUPLACER was conducted with students in both developmental reading and Freshman Composition course who knew the test would not count. Such a no-stake testing environment preconditioned students to underperform, because they did not take the test seriously.

- About the pilot testing, we are also uncertain as to:
  - a. whether exempt students who had decent GPAs in reading-intensive courses were tested, as these outcomes would have provided a more accurate picture of what would be an adequate cut score.
  - b. whether there was consideration of the correlation between individual students' scores on the ACCUPLACER and their "midterm" (early exit) ACT and final ACT scores.
  - c. whether the students' GPAs for the Spring semester were tracked to see how they performed in reading-heavy credit-bearing courses.
- CUNY Central has, in part, justified the cut score of 55 by saying that students with this score had good chances of passing Freshman Composition. However, passing Freshman Composition is not a good measure of a student's reading ability; these courses explicitly assess a student's writing. While writing and reading are complementary processes, the cognitive process of each is different; and one cannot substitute for the other in assessment of competencies.
- According to data published by College Board ("Distribution of Test Scores & Percentiles of Test Scores April, 2012 to March, 2015"), a score of 55 places students in the 25th percentile of all students taking the ACCUPLACER. Given that the mean score is 71.81 and the standard deviation is 22.29, the CRDC does not believe that the 25th percentile represents "college-ready" reading abilities.

## **B. CRDC's Critique of ACCUPLACER as an Exit Examination:**

While we understand that there are no other viable options for *placement* at the moment, the CRDC is seriously concerned that ACCUPLACER, even in its newest iteration, does not speak to the needs of CUNY's diversely academically prepared student population nor to the English

language learners and those with Developmental and Special Education needs. More importantly, it does not measure reliably or validly the learning outcomes that the CRDC meticulously established for developmental reading when compared to the new CUNY exam developed by a consortium of reading specialists and experts from within the City University of New York. The following are only a fraction of the concerns that represent the key reasons the CRDC is convinced that the Next Generation ACCUPLACER should not be used as the new upper-level developmental reading final exam:

- Vocabulary questions in the Next Generation ACCUPLACER test are not contextualized, which is discriminatory to English language learners. Measuring existing vocabulary strength is not a measure of reading comprehension or vocabulary development, and it should be avoided—especially considering the diversity of CUNY’s developmental learners.
- There is no indication that ACCUPLACER uses Lexile scoring or grade equivalencies in its reporting: yet both of are standard reading reporting measures that are essential for placement. The “rubric” that College Board uses to determine text complexity is subjective and not adequate. The CUNY-developed Reading Exam addresses both.
- Most passages in both the classic and Next Generation ACCUPLACER tests are too short to measure reading comprehension, analytical strategies, and critical reading effectively. Specifically, no passages in ACCUPLACER are longer than 400 words, and most of them are *significantly* shorter than that. This is not conducive to effective measurement of most academic and critical reading competencies—especially those involving relationships between concepts, propositions, perspectives, and sentence-level comprehension.
- Even though the Next Generation ACCUPLACER test has included only one longer passage and removed questions on sentence relationships, these changes do not present an overall improvement in test items necessary to expand the assessment scope so as to address 21<sup>st</sup> Century literacy requirements.
- ACCUPLACER, in its own literature, identifies its services as, “**placement and diagnostics** to support intervention and to help answer the challenges of accurate **placement** and remediation”—not exit-from-developmental reading. The College Board itself agrees with the CRDC’s belief that ACCUPLACER is not a comprehensive enough reading assessment instrument to measure end-of-term developmental reading learning outcomes.

**II. CRDC’s recommended guidelines for reading placement cut score**

**A. Standards recommended for developmental reading placement cut score**

**1. National Mean Cut Scores for Standardized Reading Tests**

In the report “Tests and Cut Scores Used for Student Placement in Postsecondary Education: Fall 2011” published by the National Assessment Governing Board (Fields & Parsad 2012), the mean cut scores for five standardized reading tests used by postsecondary institutions nationwide were compared. We have reproduced the relevant results from this report below:

**Table 1** Mean reading test scores below which entering students were identified as in need of developmental or remedial courses in reading, for selected tests reported by postsecondary institutions, by institution level and type: Fall 2011

	Mean Reading Test Cut Scores				
	ACT	SAT	ACCUPLACER	ASSET	COMPASS
	Reading	Critical Reading	Reading Comprehension	Reading Skills	Reading
All institutions	18	456	76	41	76
Institution level					
2-year	19	471	77	41	76
4-year	18	447	76	40	77
Institution type					
Public 2-year	18	470	77	41	76
Public 4-year	18	449	77	---	77

This concordance should be used to determine the cut score for the classic version of the ACCUPLACER, which CUNY will use for reading placement in Spring 2017. Based on the national mean cut score for all institutions, the cut score for reading placement should be set at 75, not 55 on the ACCUPLACER reading test.

**2. CUNY cut score on the SAT Critical Reading Test for reading exemption**

Currently, incoming CUNY students are exempt from developmental reading if they score high enough on the SAT Critical Reading Test, the ACT English Test, or the NYS English Regents Exam.

**Table 2** Qualifying scores for exemption from developmental reading at CUNY

CUNY Reading Cut scores			National Mean Cut score comparison	
SAT Verbal/Critical Reading	ACT English	NYS English Regents	SAT Critical Reading	ACCUPLACER Reading
480	20	75	456	76

The CUNY cut score for reading exemption is 480 on the SAT Critical Reading test. Based on the concordance in Table 2, a score of 76 on the ACCUPLACER corresponds to a score of 456 on the SAT Critical Reading. In order to match the cut score standard on the SAT, which is 480, the cut score on the ACCUPLACER should be set above 76. This should be observed especially when the ACCUPLACER is used as reading exit (as proposed for the express and immersion workshops across CUNY campuses).

**3. National cut score percentiles**

When setting the cut scores, CUNY should consider the corresponding national cut score percentiles.

**Table 3** Percentiles for reading test cut scores below which entering students were identified as in need of developmental or remedial courses in reading, for selected tests reported by postsecondary institutions, by institution level and type: Fall 2011 (Fields & Parsad, 2012)

	Percentile for reading test cut scores														
	ACT			SAT			ACCUPLACER			ASSET			COMPASS		
	Reading			Critical Reading			Reading Comprehension			Reading Skills			Reading		
	25 <sup>th</sup>	50 <sup>th</sup>	75 <sup>th</sup>	25 <sup>th</sup>	50 <sup>th</sup>	75 <sup>th</sup>	25 <sup>th</sup>	50 <sup>th</sup>	75 <sup>th</sup>	25 <sup>th</sup>	50 <sup>th</sup>	75 <sup>th</sup>	25 <sup>th</sup>	50 <sup>th</sup>	75 <sup>th</sup>
All institutions	17	18	19	430	450	480	71	76	80	40	40	41	73	79	81
Institution level															
2-year	17	18	19	450	470	490	75	78	80	40	40	41	74	80	81
4 year	17	18	19	420	440	480	69	77	79	38	40	41	70	79	80
Institution type															
Public 2-year	17	18	19	440	470	490	76	78	80	40	40	41	74	80	81
Public 4-year	16	18	19	430	440	470	74	78	80	--	--	--	74	79	81

Table 3 shows that a score of 71 on the ACCUPLACER corresponds to the 25<sup>th</sup> percentile nationwide for all institutions. Therefore, a score of 55 would correspond to a much lower percentile. This would place CUNY’s standard at the lowest level, compared to colleges nationwide. On the contrary, CRDC’s recommended score of 75 would correspond to a percentile between 25<sup>th</sup> and 50<sup>th</sup> and place the CUNY standard at a more appropriate level.

## **B. Content area courses and college reading readiness**

Reading test validity should be based on student performance in reading-intensive content area courses, including gateway STEM courses, rather than only on Freshman Composition. Studies at CUNY and elsewhere revealed that students' performance in content area courses correlates with their levels of reading proficiency (Espin & Deno, 1993; Behrman & Street, 2005, Kwon, Chen, & But, 2016). Readability levels tend to be higher in STEM areas, at times close to 1600L on the Lexile scale for first year textbooks, because of text complexity, conceptual density, and the requirement of multiple forms of literacy. In a study that forecasted comprehension rate associated with the average readability measure in college-level texts in various content areas showed that as text readability increases, the gap between the reader and the text widens and the comprehension rate declines (Williamson, 2008).

The study also showed that “an individual who reads the average 11th/12th-grade text [at 1123L] with 75% comprehension could expect to have less than 50% comprehension of the average university text” (Williamson, 2008). This readability gap is significantly widened in reading-intensive STEM and professional courses (e.g. Biology, Engineering, and Accounting). In these courses, high failure and attrition rates (over 30% in some cases according to CUNY data) can be attributed to students' under-preparedness in reading.

A cut score of 55 (way below the college reading level of 75) on the ACCUPLACER Reading test would place a significant number of students who are underprepared in reading into college-level reading-intensive courses. These students are especially prone to fail in these courses, especially when there are no built-in instructional approaches and resources to engage students in active reading and scaffold reading material required in both lectures and lab classes.

## **C. The ethics of developmental reading education**

Developmental reading courses are instrumental to equipping students to meet the requirements of college-level reading, critical thinking, and disciplinary literacy. It is ethical to ensure that students who are in need of intervention will have the opportunity to enroll in developmental reading courses, rather than let them bypass this level of training by setting a lower standard. This would only add to the burden of the already high failure and attrition rates in many gateway content area courses across CUNY.

**III. CRDC's recommendations for moving forward:**

CUNY has the professional and moral obligations to uphold academic standards and to provide adequate resources for pedagogical research and faculty development to strengthen developmental reading education. This will ensure a strong literacy foundation for our students and keep them competitive in their college career and beyond.

CUNY's current lack of commitment to improving developmental reading education is reflected by its lack of engagement and resources to support effective assessment and faculty development. This ill-conceived position is more pronounced in the recruitment of instructors, who lack the credentials or experience as reading specialists, to teach reading in various non-course based interventions. This process overlooks the diversity of the population of students by language, educational preparation, and more critically, learning disabilities. These initiatives not only fail to fulfill CUNY's mission to provide quality education to our students, but also go against CUNY's promise to provide access to opportunities that enable student success, which includes excellent developmental education.

To fulfill its duty to serve students who are underprepared in reading effectively, it is recommended that CUNY do the following:

1. revise the cut score of 55 to 75 on the ACCUPLACER for reading placement.
2. provide funding/support/resources for reading programs before and during changes in curriculum and assessment.
3. consult with the CRDC about academic and assessment decisions in developmental reading and seek approval from the Council before final decisions are reached.
4. hold system-wide general information sessions to ensure effective communication, transition, and implementation of changes in developmental reading.
5. ensure the uniformity of standards and implementation of the CUNY Reading Outcomes in all reading courses and non-course based interventions, including USIP, Express Workshop, Freshman Year Reading Courses, and CLIP, EOC, CUNY Start.
6. provide funding/support/resources for reading education research, faculty development, and CUNY-wide reading across the disciplines programs to offer students academic support beyond developmental reading.

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