

“Request for Approval” Process – Local Colleges

- A. Guidelines Governing the Approval Process – The CCC Standards, Policies and Procedures for the Evaluation of Assessment Instruments Used in the California Community Colleges (4th Edition, Revised MARCH 2001)
- B. **Types of Evidence to be Submitted (Focus of This Training Session)**
 - 1. Standard 1: Validity – Content, Criterion-Related, Consequential
 - 2. Standard 2: Reliability – Test-Retest, Internal Consistency, Inter-Rater
 - 3. Standard 3: Test Bias – Judgmental, Empirical
 - 4. Standard 4: Cut Score Validity – Initial Setting of, Empirical Renewal Validation
 - 5. Standard 5: Disproportionate Impact – Initial Plan, Empirical Renewal Data
 - 6. Accommodations
 - 7. Signed CCCCCO Request for Approval Form (this form may be found on the CCCCCO website under the Matriculation Resources link and is titled “Signature page for locally managed or developed assessment instruments).”
- C. Four levels of approval status exist.
 - 1. A1: Full Approval (6 years)
 - 2. A2: Provisional (one year + two years at Probationary level)
 - 3. A3: Probationary (two years)
 - 4. B: Not Approved (test is not included on list of approved tests)
- D. Two minimums are required to attain an approval level.
 - 1. **There must be evidence of the test's validity for the intended purpose, and**
 - 2. **There must be evidence that the test minimizes cultural/linguistic bias, insensitivity and offensiveness.**
- E. Initial approval is granted for a six-year period from the date that a test receives its first status in one of the approval categories. The approval status of a test must be renewed prior to the end of this six-year period in order for a college to continue its use for placement.
- F. Using an approved commercially available second-party published test.
 - 1. No information need be submitted (mailed) for review. Studies are to be conducted locally addressing three of the Review Standards: Content Validity, Cut-Score Validity and Disproportionate Impact.
 - 2. If the results of these studies are supportive of use of the test, then the information is filed and shared at the time of a site visit.

3. If the results of these studies are not supportive of use of the test, steps should be taken to rectify deficiencies in the placement system based on the data. This may include selecting a different test (e.g., content validity is not sufficient for all the courses), changing a test's cut scores for placement into one or more of the courses, or investigating why disproportionate impact might be occurring, justifying its existence or taking steps to minimize it.

G. Using a locally managed/developed test.

1. Information must be submitted (mailed) for review addressing all five of the Review Standards: Content Validity, Reliability, Test Bias, Cut-Score Validity and Disproportionate Impact, plus a completed and signed CCCCCO Request for Approval Form. Two cycles of review are conducted each year. Colleges may submit materials in mid-April (around the 15th) or in mid-November (around the 15th).

The information is to be sent by email or mailed to Kimberly McDaniel at the Chancellor's Office.

2. In order to be granted at least Probationary Approval status, the college must submit a **minimum of one type of acceptable validity evidence and must satisfy the Test Bias standard.**
3. During the **"initial"** submission for a test, either a judgmental or an empirical method may be used to establish cut-scores. Only a plan need be presented for monitoring Disproportionate Impact.
4. For **"renewal,"** some form of empirical data (consequential- or criterion-related validity) needs to be submitted to support the validity of the test's cut-scores being used for placement. Data addressing disproportionate impact does need to be submitted when applying for approval renewal for an instrument. The data submitted must be from the prior three-year period.
5. Once materials are submitted, colleges receive a Preliminary Report of the initial review findings (within approximately one month). Based on these findings, the college may submit a response to clarify or supplement their materials (approximately three weeks are provided for a response).
6. If a response is received, the review report is revised. The original/revised Preliminary Reports are distributed to members of the MAC Assessment

Workgroup for their review and recommendations at meetings held bi-annually at the Chancellor's Office (meetings held in January/early February for November submitted materials and in June for April submitted materials).

7. Based on the review and recommendations by the MAC Assessment Workgroup, the colleges are sent a Final Report identifying the approval level status for the test(s) submitted and the CCC Chancellor's Office publishes the list of Approved tests for use as placement tools by California Community Colleges.
8. Colleges may appeal decisions made within 30 days of the receipt of the Final Report.

Preliminary Report Examples

Given below are two Comment Examples of **Preliminary Reports** sent to colleges after an initial review of submitted evidence requesting approval for use of a locally controlled/managed test. The first Comment Example is for the review of objective-based instruments and the second Comment Example is for the review of performance-based assessments. Preliminary Reports are shared with colleges so they may provide additional information or clarification to help support the case the college wishes to make for a test before the MAC Assessment Workgroup reviews the material at their bi-annual meetings and makes their recommendations to the Chancellor's Office.

The format for the Preliminary Report has been designed to evaluate and provide observation and comments in each of the areas considered in this review (validity, reliability, test bias, cut scores, and disproportionate impact). Categories were created for each of these standards areas that would point out likely areas of deficiency. When a category at the top of the form is marked "NO" in the "Problems" area for a particular Standard, that is an indication that no problems were found based on the information supplied for this review and no additional information is required for the category at this review level. When a category is marked "YES", this is an indication of a perceived deficiency. Additional evidence will need to be supplied within the time period established for the approval category before "full approval" consideration is possible. Often the category itself is sufficiently descriptive that a comment may not be made. Comments have been written when they would help to clarify or point out exactly the deficiency or weakness.

At the top of the report form is the preliminary recommendation and, when a problem has been observed, an indication of the Standard area that requires attention. Action to correct these "problems" can be expected to lead to a higher level recommendation. Under current policies, instruments not placed in one of the three "Approved" categories (Full, Provisional, Probationary) may not be used to assist with the placement of students into classes after the Chancellor's recommendations are announced.

California Community Colleges Locally Managed/Developed Objective Test

College: _____ Renewal Request? Yes _____ No

Test/System: **Algebra Readiness Test** Prior review dates: **expires 06/2005**

Recommendation: _____ Approval _____ Probationary Approval
_____ Provisional Approval Disapproval*

***(Note: Some form of validity evidence must be judged satisfactory before any level of approval may be awarded.)**

Problems:

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 1. Content Validity |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 2. Reliability (____Stability or ____Internal Consistency____Standard Error) |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 3. Test Bias |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 4. Cut Score |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 5. Disproportionate impact (See comment.) |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 6. Other |

Review Analysis and Comments

1. *Validity*

Content (____Insufficient Info. _____Plan Only/No Data _____Inadequate Study Other)

The data presented are sufficient to document that the test items measure course prerequisite skills, but do not provide evidence on the comprehensiveness of the measurement. Evidence is needed to identify how many of the course prerequisite skills are being measured by the items, only one? Two? All? The items may be highly aligned, but only focus on, for Comment Example, 3 of 10 prerequisite skills. Evidence is needed addressing the comprehensiveness of the measurement, i.e., how many prerequisite skills are being measured? How many are not being measured?

2. *Reliability*

____Stability
-OR- (____Insufficient Info. _____Plan Only/No Data _____Inadequate Study _____Other)
____Internal Consistency

Standard
Error (____Insufficient Info. _____Plan Only/No Data _____Inadequate Study _____Other)

3. *Test Bias* (Insufficient Info. Plan Only/No Data Inadequate Study Other)
(Note: Must perform one of these: DIF analysis, panel group, or differential prediction for appropriate linguistic and/or cultural groups.)

4. *Cut Score* (Insufficient Info. Plan Only/No Data Inadequate Study Other)
(Note: May establish cut score through empirical or judgmental process.)

For renewal, some form of empirical evidence is needed that meets published criteria. The criterion related validity evidence submitted provides borderline evidence. The MAC Assessment Workgroup members will need to determine whether the data provided are sufficient. The consequential related validity evidence is supportive for MATH 200; however, no data were submitted for MATH 360. For consequential validity, it is equally important that students and faculty be satisfied with the default placement into the lower level course. It might be that the cut-scores for placement into MATH 200 are too high; resulting in placement of students into MATH 360 who they and instructors feel should be placed into the higher level course.

5. *Disproportionate Impact*
(Insufficient Info. Plan Only/No Data Inadequate Study Other)

To address disproportionate impact, two sets of analyses were presented, one addressing differential placement into courses, the other addressing differential success rates once placed into the course. The report places more emphasis in drawing conclusions on the results from the latter set of analyses than from the former. In doing so, different opinions occur on what the college identifies as the important disproportionate impact issues on which to focus their efforts.

For Comment Example, there is evidence that disproportionate impact occurs for age groups with students age “19 and younger” being placed into the higher level MATH 200 course at a higher rate than for the other age groups (1st set of analyses). Yet this is not identified as a concern for the college, but rather the concern is that this age group does not appear to be as “successful” in passing the course as the other age groups once the students qualify for the class (2nd set of analyses).

Similarly, there is evidence of placement rate differences for Hispanics, (1st set of analyses) but because the success rate is similar (2nd set), it is concluded that this is not a problem.

Typically in disproportionate impact studies, placement rate differences are a primary or the only source of evidence provided. It is recommended that the college not ignore, but rather explore, reasons for the differential placement of Hispanic students into MATH 200. Likewise, it is noted that the “raw” placement rate for “Black Non-Hispanic” students into MATH 2—is at a lower rate than even for Hispanics. It is assumed that the inclusion of high school GPA in the regression equation was moderating this effect and explains why this group was not flagged.

The above comments are for feedback purposes only and do not require any response or submission of additional data.

6. *Other*

California Community Colleges Locally Managed/Developed Writing
Assessment

College: _____ Renewal Request? _____ Yes No

Test/System: **Oral Interview** Prior dates of review: **6/2004; R, CS**

Recommendation: _____ Approval Probationary Approval*
_____ Provisional Approval _____ Disapproval

*** The approval level automatically drops from Provisional to Probationary after a one-year period if sufficient evidence is not provided for Full Approval.**

Problems:

- | | | |
|---|--|--|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 1. Content Validity |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 2. Reliability (<input checked="" type="checkbox"/> Inter-scorer <input type="checkbox"/> Inter-Prompt) |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 3. Test Bias |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 4. Cut Score |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | 5. Disproportionate impact |
| <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | 6. Other |

Review Analysis and Comments

1. *Validity*

Content (Insufficient Info. Plan Only/No Data Inadequate Study Other)
(Documentation at the college should include (1) a description of development of writing prompts, scoring rubrics, training of scorers and administration for scoring, and (2) a description of relationship with courses.)

2. *Reliability*

Inter-scorer (Insufficient Info. Plan Only/No Data Inadequate Study Other)

The data provided are for only 23 ratings using two raters. At least 50 ratings should be in the sample set of data and if several raters are used in the rating process, data on more than two raters should be provided.

Interprompt (when multiple prompts are used to assist placement for a specific semester/term)
(Insufficient Info. Plan Only/No Data Inadequate Study Other)

3. *Test Bias* (___Insufficient Info. ___Plan Only/No Data ___Inadequate Study ___Other)
(Note: must perform one of these: DIF analysis, panel evaluation review, or differential prediction for appropriate linguistic or cultural groups.)

4. *Cut Score* (___Insufficient Info. ___Plan Only/No Data Inadequate Study ___Other)
(Note: may establish cut score(s) through empirical or judgmental process.)

Some Consequential related validity is provided, but not for the High Beginning courses (520 level) of concern in the June 2004 review and report. It is critical that supportive data for the 520 level courses be provided in order for the awarding of Full Approval status.

5. *Disproportionate Impact* (___Insufficient Info. ___Plan Only/No Data ___Inadequate Study ___Other)

6. *Other*

An officially signed Approval Request form has yet to be received. If this form is not received during this review cycle, use of this test is likely to be disapproved.