
Understanding Holistic Review in Higher Education Admissions

Guiding Principles and Model Illustrations

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Executive Summary

Individualized holistic review is a cornerstone of admissions among selective higher education institutions. Despite the remarkable variability among institution types—with respect to mission, setting, and more—key points of effective practice continue to guide the field.

Individualized holistic review optimally reflects three common characteristics:

- Mission alignment, which is focused on advancing the institution's core educational goals through the admissions process.
- A two-part inquiry regarding applicants: attention to their likely ability to succeed and thrive at a given institution and attention to their ability to enhance the educational experiences of their peers in and out of the classroom.
- Consideration of multiple, often intersecting, factors—academic, nonacademic, and contextual—that, in combination, uniquely define and reflect accomplishments and potential contributions of each applicant in light of his or her background and circumstances.

Additionally, such practices are most effective when they are part of a comprehensive, coordinated enrollment management process, including outreach and recruitment, financial aid and scholarships, capacity building (including first-year transitions), and curricular and cocurricular alignment.

The processes associated with individualized holistic review should reflect:

- Integrity, with a focus on rigor, consistency, and fairness when applying valid criteria in selection, which should include multiple reviews, clear protocols, calibration, and ongoing professional development for enrollment staff and application readers.
- A process of continuous improvement that involves a periodic evaluation of success in light of all relevant evidence inclusive of institutional goals, changing circumstances, and resource capacity issues.

Additionally, engagement with leaders throughout the institution on key policy and practice issues is a hallmark of success of holistic review in admissions.

Finally, appropriate transparency with proactive, collaborative, and sustained communications and engagement efforts with both internal and external audiences is a key element of holistic admission and is essential in engendering stakeholder and public trust.

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Foreword

Few topics in higher education generate the sustained attention that surrounds questions about student admissions, particularly when matters of diversity are present. For decades, as policies and practices have evolved to keep pace with evolving institutional identities and missions and changing demographics, the question of “who gets admitted” has been center stage. Press and social media headlines, voter initiatives, and court rulings all contribute questions and opinions about admissions. Unfortunately, much of the rhetoric that has shaped public perception has been, at best, ill-informed; and at worst, the product of ideology divorced from institutional goals, the complexities of institutional context, and evidence-informed deliberation. Thus, the myths of a “black box” associated with admissions and holistic decision-making persist and serve no one well.

Properly understood, the admissions process of selective and moderately selective institutions is central to their identity—the class of applicants they admit is a manifestation of who they are.¹ The principles, aspirations, and judgments of education leaders about excellence in education are inextricably linked with the composition and climate of their student communities. Despite the vast variability of postsecondary institutions and their admission policies, many of the fundamentals are shared and consistent.

Grounded in a robust body of research, experience, and law, we have written this guide to provide admissions professionals and their campus partners with evidence-based practical insight into the practice of admissions. Our principal goal is to help explain the values, logic, and rigor that drive effective admissions practices associated with a multifaceted holistic review. In our view, there is a need to recognize both the unique practices among higher education institutions, as well as the underlying common framework that the specific practices rely on. And, along the way, we think it is critical to acknowledge that the process of admissions remains one not of perfection, but of rationality and fairness, grounded in a commitment to continuous improvement.²

To achieve these aims, this guide addresses two sets of issues central to success for admissions practitioners:

- To answer the question of “just what is individualized holistic review,” **Part One** explains key features and elements of the practice. While recognizing the strength of myriad designs reflecting the wide range of institutions in American higher education, it provides baseline information regarding the practice, amplified with an articulation of some key elements generally associated with effective holistic review and illustrations.
- **Part Two** addresses the question of how to advance holistic review goals as a matter of process and process management. It offers an overview of key protocols and procedural steps, including examples of the kind of rigor associated with well-designed and well-executed admissions policies for integrity and accountability.

1. See also Gretchen W. Rigol, *Admissions Decision-Making Models* (College Board, 2003), at 5–7, available at <https://research.collegeboard.org/publications/content/2012/05/admissions-decision-making-models-how-us-institutions-higher-education>.

Not all institutions of higher education conduct holistic review in their admission process. For instance, in “open access” admissions, finite, objective criteria (e.g., specific course prerequisites, grades achieved, and the like) may alone determine whether a student matriculates. Open access admission fulfills the mission of many institutions, particularly certain state or community colleges whose purpose is strongly focused on serving local residents.

2. This guide focuses on institutions that use holistic review in admissions. It also may be helpful to those institutions with open admissions policies, where students who satisfy publicized course and grade prerequisites are automatically admitted. The principles discussed here can be adapted to practices such as financial aid or those involving participation in experiential learning opportunities.

In concluding this guide, we renew a challenge for the entire higher education community to think differently about communications—to fully own and relay the importance of professional judgment as part of the admissions process, and to more forcefully reject misguided notions that mechanics trump human judgment.

Throughout this guide, we offer important general principles, bolstered with examples that can inform each institution in ways that will best serve its mission. To be very clear: This guide isn't intended to prescribe a limited number of ways for holistic review to be effective and legally sustainable.

Important empirical foundations shape this guide.

First, decades of experience in the field, which have been subject of much study and evaluation, provide key baselines for this guide. Over time, as policies and practices have evolved, lessons have been learned—from successes and from setbacks. We attempt to embed those lessons as part of this resource—many shared by our colleagues in the field.

Second, for four decades, the federal courts have helped shape policy and practice, particularly where institutional interests in student diversity associated with race and ethnicity have been concerned. The weighty precedent of 40 years of Supreme Court nondiscrimination decisions that set forth core principles, frameworks, and kinds of evidence required to justify consideration of race are important to reflect in any resource of this type.³

Finally, we are grateful for the insight and wisdom shared by many in the production of this guide. In particular, our colleagues, who provide support to the College Board's Access & Diversity Collaborative, have contributed in significant ways to its design and substance.⁴ Indeed, the wisdom reflected here is theirs, not ours.⁵ We merely had the privilege of attempting to channel their passions and perspectives. Any errors in representing this highly complex landscape are ours alone.

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3. Court rulings and federal agency policy have continuously affirmed that the compelling educational benefits for all students associated with student diversity can support appropriately designed and justified policies that reflect considerations of race and ethnicity. See, e.g., *University of California Regents v. Bakke*, 438 U.S. 265 (1978) (Powell, J.) (benefits of broad diversity in medical school); *Grutter v. Bollinger*, 539 U.S. 306 (2003) (benefits of diversity justify individualized holistic review involving the consideration of race and ethnicity in law school); *Gratz v. Bollinger*, 539 U.S. 244 (2003) (grounding decision in recognition of the educational benefits of diversity in the undergraduate student body and against mechanical consideration of race); *Fisher v. Univ. of Texas at Austin*, 570 U.S. ____ (2013) (recognizing the compelling interest in educational benefits of diversity as a foundation for discussion of strict scrutiny of race-conscious practices); *Fisher v. Univ. of Texas at Austin*, 579 U.S. ____ (2016) (grounding decision upholding consideration of race and ethnicity as part of holistic

review in conclusions regarding the educational benefits of diversity in undergraduate admissions). See also *Parents Involved in Community Schools v. Seattle School Dist. No. 1*, 551 U.S. 701 (2007) (recognition in dicta by all nine Justices that the educational benefits of diversity have been recognized by the Court as a compelling interest in higher education that can support the consideration of race in admissions).

4. For additional information on the College Board's Access & Diversity Collaborative, see Appendix D.

5. We are particularly grateful for the idea-generating research and editorial assistance of David Dixon and Emily Webb. We are also very appreciative of the valuable feedback and thought-provoking insight provided by external reviewers including David Hawkins, Jerry Lucido, Rachele Hernandez, and Frank Trinity, as well as Connie Betterton and Wendell Hall from The College Board.

Key Features and Elements of Individualized Holistic Review

“It is the business of a university to provide that atmosphere which is most conducive to speculation, experiment and creation. It is an atmosphere in which there prevails ‘the ... essential freedom’... to determine ... who may be admitted to study.”

—JUSTICE FELIX FRANKFURTER, *SWEETZ V. NEW HAMPSHIRE* (1957)

I. Introduction and Overview

Individualized holistic review is a cornerstone of the admissions process for selective higher education institutions, embodying a rigorous evidence-based and data-informed exercise in expert human judgment that seeks to attain particular institutional goals. Broadly speaking, it is a “flexible, highly individualized process by which balanced consideration is given to the multiple ways in which applicants may prepare for and demonstrate suitability” as students at a particular institution.⁶ And, although no single definition can fully capture the legitimate variability among colleges and universities that manifest varied missions and admissions aims, the policy and practice landscape (informed by guiding federal court decisions) provide insight into key elements typical of effective practices.

First, **holistic review is mission aligned**, meaning that the unique history, character, aims, vision, and educational and societal contributions of an institution set a critical stage for decision-making in admissions.

Second, **holistic review typically reflects a duality of institutional aims** centered on judgments about particular students’ likely ability to succeed and thrive at a given institution and, as importantly, a student’s potential to contribute to the teaching and learning experience of their peers and ultimately to affect contributions of the institution to society.

Third, to attain these aims, **holistic review involves consideration of multiple, intersecting factors—academic, nonacademic, and contextual—that enter the mix and uniquely combine to define each individual applicant**. A robust consideration of quantitative and qualitative factors, all considered in context of the applicant’s background and circumstances—and how they relate to one another in a particular applicant’s profile—shape admission decisions.

With these key elements present, holistic review will most likely achieve its aims if it is integrated as part of the institution’s overall enrollment strategy, with connectivity among outreach, recruitment, admissions, and aid policies and practices; and its design reflects the strengths and needs associated with the educational experience, curricular and cocurricular, of the students who are admitted.

6. Association of American Medical Colleges, *Roadmap to Diversity: Integrating Holistic Review Principles into Medical School Admission Processes* (AAMC, 2010), at 5, available at <https://www.aamc.org/initiatives/holisticreview/resources/>.

II. Key Elements

A. MISSION ALIGNMENT

Higher education mission and related policy statements reflect the educational aims, and educational and societal roles central to an institution's investment and action. As an institution's "formal, public declaration of its purposes and its vision of excellence," mission statements, or other policy statements expressing important aims and character of the institution (whatever their label), are "the necessary condition for many different individuals to pull together through a myriad of activities to achieve central shared purposes."⁷ Well-developed mission and policy statements—particularly when institutional mission statements are carried forward to aligned department and unit statements—can have operational effects. They provide important clarity to inform decision-making among all actors toward the excellence the institution seeks, establishing coherence, alignment, and synergies among various units, schools, and departments within individual institutions. Mission statements are typically broad, so it is important to derive from mission statements or

other statements of institutional vision/direction a clear set of goals and objectives, and the underlying rationales that support those aims. It is also important to be explicit about the relevance and importance of student body diversity to achieving such goals, with implications for the selection of entering students.⁸

In schools large and small, urban and rural, research, private, public, and land grant (and more), admission decisions are grounded in the unique history, character, aims, and vision that define an institution. Moreover, differences *within* institutions—between undergraduate and graduate/professional programs, and among schools within undergraduate institutions, for instance—also have distinct goals that affect admission.⁹ What works for one institution (or department or professional school within an institution) in light of its mission and processes won't necessarily work for another.¹⁰

"There are almost as many different approaches to selection as there are institutions."¹¹ Institutions routinely adapt a holistic review to make it their own, as a natural extension of their institutional mission and a tool to achieve the institution's educational and societal goals.¹²

7. Jerry Gaff and Jack Meacham, *Learning Goals in Mission Statements: Implications for Educational Leadership*, 92 *Liberal Education* (Association of American Colleges and Universities, 2006), <https://www.aacu.org/publications-research/periodicals/learning-goals-mission-statements-implications-educational>. (To ensure that a mission statement is effective as a driver of institutional goals, it's important to involve a range of stakeholders in its development, and that the mission statement be endorsed by the governing board and communicated broadly across the institution.)

8. AAMC, *supra* 6, at 5.

In a 2003 survey, the National Association for College Admission Counseling (NACAC) identified the strong interest that institutions of higher education have in broad student body diversity that includes but isn't limited to race and ethnicity, including geography, socioeconomic status, gender, age, religion, first-generation students, international students, and special talents. This connection of mission to a broad diversity interest is captured in the amicus brief of the College Board in which the American Association of College Registrars and Admissions Officers (AACRAO), the Law School Admission Council (LSAC), and NACAC joined, "To continue as academic, economic, and civic engines for excellence, colleges and universities must be able to define and pursue their education missions and education goals, within appropriate parameters. Admitting classes of students who are best able to contribute and succeed is a vital exercise of institutional identity and autonomy because mission is achieved through the student bodies that institutions admit and educate." See Brief for the College Board, et al. as Amici Curiae Supporting Respondents, *Fisher v. University of Texas at Austin*, 579 US __ (2016) (no.14-981), available at <http://educationcounsel.com/?publication=fisher-v-university-of-texas-u-s-supreme-court-amicus-brief-2015>.

9. See for example, North Carolina State University, Compl. 11-04-2009 (U.S. Department of Education, November 27, 2012) (letter of resolution), available at <https://www2.ed.gov/about/offices/list/ocr/docs/investigations/11042009-a.pdf>. The letter of resolution of the U.S. Department of Education Office for Civil Rights stated: "The manner in which race may be taken into account varies

from college to college within [North Carolina State] University. OCR considered that some colleges are less in demand than others and that virtually all who apply to those colleges are admitted. On the other hand, some colleges and programs within those colleges are very popular with applicants. Within those selective colleges, the procedures and factors considered in deciding whether to grant or deny admission to students who do not automatically qualify under the presumptive admit criteria vary. Consequently, diversity factors such as race also receive different emphasis. For example, a representative from the College of Management stressed the importance of preparing students to work in a global marketplace, including international settings, and placed greater emphasis on diversity factors than the College of Design, where students' demonstrated design or artistic talents are of nearly exclusive importance. ... Representatives from the College of Engineering and the College of Management indicated that they consider applicants' contributions to diversity, including race, life experiences, rural background, international experiences, and family background."

10. Specific considerations that drive admission judgments typically include the institution's unique roles, mission characteristics and goals, academic approach and philosophy, nonacademic programs, financial resources, and the likely "yield" of admitted students, to name a few. Jerome A. Lucido, "How Admission Decisions Get Made," in *Handbook of Strategic Enrollment Management*, 147–173 (2015) at 147–49; Melissa Clinedinst, *State of College Admission* (National Association for College Admission Counseling, 2015) at 31, available at http://www.nxtbook.com/ygsreprints/NACAC/2014SoCA_nxtbk/.

11. Rigol, *supra* 1.

12. For example, Princeton Univ., Compl. No. 02-08- 6002 (U.S. Dep't of Educ. Sept. 9, 2015) (compliance resolution), available at <https://www2.ed.gov/about/offices/list/ocr/docs/investigations/02086002-a.pdf>; Rice Univ., Compl. No. 06-05-2020 (U.S. Department of Education, Sept. 10, 2013) (compliance resolution), available at <http://www.ed.gov/about/offices/list/ocr/docs/investigations/06052020-a.html> (last modified Jan. 14, 2015).

Because institutions realize their mission-oriented goals through the wide range of intellectual and personal experiences and pursuits of their students, they take great care as they create entering classes. Although mission, resource limitations, and sometimes state constitutional and legislative charters influence admissions policies and goals, the goal of providing all students opportunities to engage in and out of the classroom with a diverse community of peers is broadly recognized as a critical element of excellence in higher education. As then-president Shirley Tilghman explained to Princeton's class of 2009 on their first day, "Never again will you live with a group of peers that was expressly assembled to expand your horizons and open your eyes to the fascinating richness of the human condition."¹³

B. A FOCUS ON AN APPLICANT'S LIKELY SUCCESS AND CONTRIBUTION TO THE SCHOOL COMMUNITY

In light of an applicant's accomplishments, talents, experiences, and potential to succeed, as well as his or her potential to contribute to the institution's community,¹⁴ the universally defining feature of holistic review is its flexible framework that allows for the institution-specific consideration of a range of intersecting factors. As reflected here, "merit" for admission is not limited to any one factor and cannot be determined out of context of the barriers, advantages, and experiences in each applicant's life journey. Flexibility to consider intersecting factors allows the institution to make individualized admissions decisions informed through a "dual lens"—those centered on the applicant *and* those reflecting broader institutional interests.¹⁵ The potential of students to contribute to the learning experience of their peers is a vital element in holistic review. As the American Association of Medical Colleges has explained:

Admissions committee members and screeners can contribute to shaping the diverse class the institution seeks by giving thoughtful consideration to each applicant's portfolio. They can do this by assessing how each applicant may contribute to, and benefit from, the learning environment of the institutions. ... Ultimately, the committee must think about the range of criteria it needs in a class, not just in individual applicants, to achieve the institution's mission and goals ... One responsibility of the committee, then, is to weight and balance these different factors when screening, interviewing, and selecting applicants.¹⁶

C. MANY FACTORS THAT SHAPE THE ADMISSION DECISION

The examination of student qualifications includes a myriad of factors. To be sure, detailed applications submitted by students include transcripts, high school profiles, standardized test scores, essays, and letters of recommendation. But, academic factors represent only one dimension of qualification and, therefore, of the ultimate decision to admit. For example, considering the context in which the achievement took place is also important, as are personal qualities such as creativity, determination, teamwork, intercultural competence, and ethical behavior.¹⁷

"Intangible qualities are often apparent only when an applicant is given the opportunity to express his or her own personal story. The quality of our students would be immeasurably poorer if we were to select them 'only on the numbers.'... [A]lso, our pedagogical responsibility as educators is to select an entering class which, when assembled together, will produce the best possible educational experience for our students."

—POST AND MINOW AMICUS BRIEF IN FISHER II DESCRIBING HARVARD AND YALE LAW SCHOOL POLICIES

13. Princeton Univ., Compl. No. 02-08-6002, *supra* 12.

14. See for example, Brief for Amherst Coll. et al. as Amici Curiae Supporting Respondents, *Gratz v. Bollinger*, 539 U.S. 244 (No. 02-516), *Grutter v. Bollinger*, 539 U.S. 309 (No. 02-241) at 9–12 (discussing the range of factors considered by small, highly selective schools and identifying 12 categories of factors relied upon by Amherst in its quest to "assess each student's likely success and contribution"); Brief for Carnegie Mellon Univ. et al. as Amici Curiae Supporting Respondents, *Gratz v. Bollinger*, 539 U.S. 244 (No. 02-516), *Grutter v. Bollinger*, 539 U.S. 309 (No. 02-241) at 4a–5a.

15. Arthur L. Coleman, et al., *A Diversity Action Blueprint: Policy Parameters and Model Practices for Higher Education Institutions* (College Board, 2010), at 15.

16. AAMC, *supra* 6, at 13. Not all students are equally able to contribute to the educational experience of their peers.

17. Lucido, *supra*, at 156–157.

Criteria generally fall into two overarching categories aimed at creating a comprehensive understanding of each applicant's suitability for admission, each understood in the context of the applicant's life story and opportunities (or lack thereof): (1) academic accomplishment and promise (not always the same criterion), and (2) personal attributes.

ACADEMIC CRITERIA, APPROPRIATELY WEIGHTED IN RELATION TO MISSION

Academic accomplishment and preparation are usually evaluated based on high school curriculum, grade point average (overall and in particular courses relevant to proposed major and program rigor), class rank, and standardized test scores, and/or other performance assessments (e.g., products of academic and creative endeavors). Intellectual capability and promise require a more nuanced assessment, considering quantitative measures, grade trends, and some understanding of an applicant's opportunities and barriers relative to the context of their high school. The weight given to these quantitative academic measures should produce the outcomes sought by the institution to achieve its mission. (That assessment should involve consideration of whether a student has taken maximum advantage of the opportunities available to them, recognizing that not all students attend schools that provide the same opportunities.) Even for highly selective institutions, weighing these measures with an overreliance on the effect on national rankings can undermine other mission-critical goals.

In considering and weighing grade point average (GPA) and class rank, institutions typically consider:

- A student's grade trajectory during his or her secondary education as well as the final average;
- Knowledge of the rigor and quality of the high school's educational program, including a high school's reputation for grade inflation or deflation, and the difficulty and load of courses taken; and
- Whether AP[®]/IB/honors courses were available and taken, among other special circumstances.

An academic index of some kind is often calculated based on these quantitative data, calibrated in light of relevant context. In addition to standardized test scores and class rank,¹⁸ GPA is considered, either taken at face value from the transcript or restated after calibration to reflect the rigor of the high school academic program and grading. A good practice is to base the weight of each component within the overall academic index score on evidence-based predictions of college GPA, using data on the performance of enrolled students.¹⁹ Although not a uniform or necessary practice at all institutions, some institutions establish a minimum threshold or guideline for an overall academic index score, below which the institution determines it is unlikely a student can successfully complete the academic work. Others conduct predictive success modeling on a highly individualized basis, considering the entire profile of each student; some combine minimum thresholds with individualized assessment. Among selective institutions, the number of applicants who are able to do the work exceeds the spaces available in a class, with that number typically increasing as selectivity increases.²⁰

18. Standardized test scores have value when used with other indicia, but alone they aren't a good measure of success in college or of merit for college admissions. See Steering Committee for the Workshop on Higher Education Admissions, *Myths and Tradeoffs: The Role of Tests in Undergraduate Admissions* (Alexandra S. Beatty, Robert L. Linn, and M. R. C. Greenwood eds., 1999); *Guidelines on the Uses of College Board Test Scores and Related Data* (College Board, 2011); Brief for Massachusetts Institute of Technology, Leland Stanford Junior University, E. I. du Pont de Nemours and Company, International Business Machine Corp., National Academy of Sciences, National Academy of Engineering, and National Action Council for Minorities in Engineering, Inc. as Amicus Curiae Supporting Respondents, *Grutter v. Bollinger* 539 U.S. 306 (2003) (no. 02-241) and *Gratz v. Bollinger* 539 U.S. 244 (2003) (no. 02-516)

at 20–21 and 44, 45 (“the use of standardized-test scores as the sole measure of merit is scientifically indefensible and the claim that a higher score should guarantee admission over another is not justifiable on empirical grounds”).

19. Rigol, *supra* 1, at 15.

20. Brief for Massachusetts Institute of Technology, Leland Stanford Junior University, E. I. du Pont de Nemours and Company, International Business Machine Corp., National Academy of Sciences, National Academy of Engineering, and National Action Council for Minorities in Engineering, Inc. as Amicus Curiae Supporting Respondents, *Grutter v. Bollinger* 539 U.S. 306 (2003) (no. 02-241) and *Gratz v. Bollinger* 539 U.S. 244 (2003) (no. 02-516).

PERSONAL CRITERIA

Personal attributes and accomplishments are also considered to better understand an applicant's promise and capacity to benefit from and contribute to the institution's educational program and overall mission. While baseline academic data may establish minimum ability and preparation for success, whether an individual contributes significantly to the institution's educational goals and actually succeeds—both in the academic program and in fulfilling other aspects of the institution's mission—may depend to a significant extent on whether they exhibit desirable personal qualities evaluated in the process.

Personal criteria may include:

- Quality of leadership;
- Record, authenticity, and depth of contributions to community;
- Commitment to inclusion and helping others scale barriers;
- Demonstrated intellectual curiosity and creativity;
- Special talents (e.g., musical, athletic);
- Life experiences, lessons learned, opportunities received, and whether they were used to maximum impact;
- Socioeconomic status;
- Burdensome job and family responsibilities balanced with school demands;
- Geographical context; and
- Experience associated with one's own and others' race, ethnicity, gender, etc.

CONTEXT

Students are often considered both on the face value of their achievements and the barriers they scaled or on the manner in which they took advantage of the opportunities presented to them. As one noted expert has opined: "Given unequal educational opportunity, it is incumbent upon admission [officers] to strive to understand the conditions under which each applicant has performed and to make judgments based on the context of those conditions."²¹ Moreover, "[n]umbers without context say little about character. They do not reveal the drive or determination to become a leader or to use the advantages of one's education to give back to society."²² As Pomona College has explained, "We have different expectations for different students: the exam scores from a daughter of two college professors are viewed in a different context than the scores from a first-generation college student who attends an underfunded high school."²³

21. Lucido, *supra*, at 157.

22. Brief of Dean Robert Post and Dean Martha Minow as Amici Curiae in Support of Respondents, in *Fisher v. University of Texas at Austin* et al. 579 U.S. ____ (2016) (no. 14-981), at http://www.scotusblog.com/wp-content/uploads/2015/11/14-981_amicus_resp_DeanRobertPost_authcheckdam.pdf.

23. Brief for Amherst College, et al. supporting respondents, p. 14, *Fisher v. Univ. of Texas at Austin* et al., 579 U.S. ____ (2016). See also description of Princeton University admissions policy in Princeton Univ., Compl. No. 02-08- 6002 (U.S. Department of Education Sept. 9, 2015) (compliance resolution), available at <https://www2.ed.gov/about/offices/list/ocr/docs/investigations/02086002-a.pdf>. (University admissions staff reviewed applicants in the context of their secondary school in order to compare their accomplishments given the resources available to those of applicants from similar settings.)

The College Board's Admissions Models Project

The College Board's landmark Admissions Models Project, the product of summits of admissions deans in 1998 and 1999, identified nearly 30 academic factors and almost 70 nonacademic factors, including:

Academic Achievement, Quality, and Potential

- Direct Measures (e.g., class rank, core curriculum grades, test scores)
- Caliber of High School (e.g., average SAT® scores, competitiveness of class, percentage attending four-year colleges)
- Evaluative Measures (e.g., artistic talent, evidence of academic passion, intellectual curiosity, grasp of world events)

Nonacademic Characteristics and Attributes

- Geographic background (e.g., academically disadvantaged school, economically disadvantaged region, from far away, school with few or no previous applicants)
- Personal background and attributes to understand the full context of each individual's life and potential to benefit and contribute (e.g., cultural diversity, first generation to go to college from family, personal disadvantage, societal experience as and self-determined identity as a member of an underrepresented minority group or with individuals who are of a different

race than self, civic awareness, concern for others, creativity, determination/grit, evidence of persistence, maturity)

- Extracurricular activities, service, and leadership (e.g., awards and honors, community service, work experience)
- Extenuating circumstances (e.g., family problems, health challenges, frequent moves, responsibility for raising a family)

A series of recent case studies conducted by the College Board builds on this body of work with the following observations:

- "High school and student contextual factors play a more important role than other nonacademic factors in the review processes at our case study sites."
- "The importance of nonacademic factors in college admissions, which are associated with institutional type and selectivity, varies widely."
- "Beyond academic and contextual factors, the additional types of nonacademic factors that are most frequently used are performance factors and attitudinal constructs."

Sources: Gretchen W. Rigol, *Admissions Decision-making Models* (College Board, 2003), at Appendix D <https://research.collegeboard.org/publications/content/2012/05/admissions-decision-making-models-how-us-institutions-higher-education>. More recent studies affirm these conclusions. See for example, Lorelle Espinosa, Matthew Gaertner, and Gary Orfield, *Race, Class, and College Access: Achieving Diversity in a Shifting Legal Landscape* (American Council on Education, 2015) at 31-32, available at <https://www.acenet.edu/news-room/Documents/Race-Class-and-College-Access-Achieving-Diversity-in-a-Shifting-Legal-Landscape.pdf> (reporting results of undergraduate admissions survey inquiring about 19 admission factors); American Association of Medical Colleges, *Roadmap to*

Diversity: Integrating Holistic Review Principles into Medical School Admission Processes (AAMC, 2010), at 9-10, available at <https://www.aamc.org/initiatives/holisticreview/resources/> (describing an "Experiences, Attributes, and Metrics" model recommended for individual medical school policy development, with a collection of 26 factors that may be considered); and College Board, *Insight into Nonacademic Factors and Practice*, Future Admissions Tools and Models Initiative (College Board, 2018), at <https://professionals.collegeboard.org/higher-ed/future-admissions-tools-and-models-initiative>. See also Jerome A. Lucido, "How Admissions Decisions Get Made," in *Handbook of Strategic Enrollment Management* 147-173 (2015) at 151-156.

THE INTERSECTIONALITY OF MULTIPLE FACTORS AS A KEY FACET OF DECISION-MAKING

Importantly, various factors considered by admissions officers to advance institutional interests intersect or inform others, and they are not weighted separately or evaluated in isolation. For example, factors like character and perseverance are assessed based on multiple elements of an application.²⁴ New measures pursued by some institutions further add depth to the traditional file, including assessments of “noncognitive” abilities.²⁵

Moreover, background qualifications and personal information also aren’t considered in isolation. For example, a student who took one AP course at his or her elite, urban high school with dozens of AP options might well be considered differently than a student who took the only AP class available at his or her rural or under-resourced school or produced an exceptional project on a complex issue in a school with no AP courses. Similarly, a U.S.-born student who did not work during high school and participated in international service ventures during summers, funded by parents, may be acknowledged for commitment to others, as well as travel, and possibly even multicultural interests. However, that student might be seen differently than a U.S.-born student who had to work after school due to family responsibilities and couldn’t travel, but was able to demonstrate an even greater dedication to help others in need and a multicultural commitment through strong, sustained, and mature actions to guide younger siblings and help immigrant families in their church community. Differences may be weighed as equivalent in accomplishment (or not) depending on the context.

The approach outlined here—with multiple, intersecting factors shaping professional judgment about whom to admit—is highly relevant to institutional efforts to assure the admission of an appropriately diverse class of students, both as a matter of policy and as a matter of federal law. (Indeed, the clear, authentic extension of holistic review principles to obtain beneficial educational experiences for all students is essential under prevailing federal nondiscrimination laws when race and ethnicity are considered.)

What does this mean? Concretely, and as a matter of good policy design and legal compliance, it means that the effective application of holistic review principles to considerations of race and ethnicity is not single-factor focused and requires that the decisions involving those factors are not overly mechanical or formulaic.²⁶ Consideration of such factors should not reflect adoption of quotas, a “thumb on the scale,” or other types of categorical classifications.

Rather, as recognized by the Association of American Medical Colleges, race should be “considered flexibly as just one of the many characteristics and pertinent elements of each individual’s background. Characteristics that make an individual particularly well suited for the medical profession, such as resilience or the ability to overcome challenges, may in some cases be intertwined with an individual’s race or ethnicity. When candidates have overcome great race-related challenges, obscuring or denying the realities of these challenges will hinder a full appreciation of their potential contributions.”²⁷

24. See for example, Michelle Sandlin, “The ‘Insight Resume’: Oregon State University’s Approach to Holistic Assessment,” in *College Admissions Officer’s Guide* (Barbara Lauren ed., 2008) at 99–108 (describing Oregon State University’s application process that requires answers to six questions designed to measure eight “noncognitive variables” as part of its unique holistic review process); Brief for Amherst College, et al., *supra* 14, at 9–12.

25. See William E. Sedlacek, “Noncognitive Measures for Higher Education Admissions,” in *International Encyclopedia of Education*, 845 (Penelope Peterson, et al., eds., 3rd ed., 2010), and portfolios of academic work starting in ninth grade, e.g., Press Release, Coalition for Access, Affordability, and Success, *Diverse Group of Universities Form Coalition to Improve College Admission Process* (Sept. 28, 2015), at 14, available at <http://www.coalitionforcollegeaccess.org/press-release.pdf>; Lucido, *supra*, at 151–56; Rigol, *supra* 1, at 19–20.

26. *Gratz v. Bollinger*, 539 U.S. 244 (2003) (Striking down as unconstitutional the automatic and mechanical assignment of points to a student on the basis of race).

27. Brief for Association of American Medical Colleges et al. as Amicus Curiae Supporting Respondents, in *Fisher v. University of Texas at Austin et al.* (“Fisher II”) 579 U.S. ____ (2016) (no. 14-981) at 26. <https://www.aamc.org/download/447744/data/aamcfilesamicusbrieffinfishervutaustin.pdf>

The intersectionality of contextual background factors reflected here has, in fact, been a hallmark of U.S. Supreme Court decisions that have affirmed the limited consideration of race or ethnicity in admissions. In its most recent pronouncement, in *Fisher v. University of Texas [Fisher II]*, the Supreme Court upheld the University of Texas's (UT) consideration of a student's race or ethnicity as part of the holistic review process, which was at all times contextual. Under UT's policy, all background qualities and characteristics of a given applicant were considered in light of all other qualities and characteristics. As a consequence, UT could not "provide even a single example of an instance in which race impacted a student's odds of admission."²⁸ In fact, when asked if she could provide "an example [in the admissions process] where race would have some impact on an applicant's personal achievement score," the admissions director at UT responded: "To be honest, not really ... [I]t's impossible to say—to give you an example of a particular student because it's all contextual."²⁹

Illustrations

- Rice University's admission process "is an individualized and holistic ... process which examines the entirety of an applicant's academic prowess, creativity, motivation, artistic talent, leadership potential, and life experiences."
- The California Institute of Technology has explained its process: "Instead of simply putting your grades and test scores into a computer to calculate admissibility, we read every application—and every essay—to get a sense of who you are and whether you would be a good fit at Caltech."
- Williams College "seeks students with strong intellectual skills who will benefit the most from the education offered at Williams and then, in turn, benefit society by filling leadership positions in local and national life."
- North Carolina State University relies on a holistic review of all applicants, with "each admission decision individual to the specific circumstances of the applicant."

Sources: See Brief of California Institute of Technology, et al. as Amici Curiae in Support of Respondents, in *Fisher v. University of Texas at Austin et al.* 579 U.S. ____ (2016) (no. 14-981) at 12; Brief of Amherst et al., Amici Curiae Supporting Respondents, in *Fisher v. University of Texas at Austin et al.* 579 U.S. ____ (2016) (no. 14-981) at 12; North Carolina State University, Compl. 11-04-2009 (U.S. Department of Education, November 27, 2012) (letter of findings), available at <https://www2.ed.gov/about/offices/list/ocr/docs/investigations/11042009-a.pdf>.

III. Alignment and Coherence Within the Institution

Ultimately, well-designed holistic review admissions processes are most often part of a comprehensive, coordinated enrollment management process that includes recruitment and outreach, financial aid and scholarships, and transition to the first year (e.g., registration, orientation, first-year experiences). Correspondingly, they are also aligned with curricular, cocurricular, and experiential learning, mentoring, and community-building programs.

It is a good practice for all enrollment management functions to work in concert toward a specific, coherent set of priorities and outcome-focused goals associated with the institution's educational and societal mission. The goal is for admission criteria to correlate well with all students' success and experiences at the institution and beyond, as reflected in positive educational outcomes including, but not limited to, retention rates, graduation rates, campus climate, and even alumni success and contributions to society.

Assembly of multidisciplinary teams, reflective of the breadth of institutional knowledge and expertise, fosters this alignment and coherence of process and goals, and informs policy and practice judgments.³⁰

28. *Fisher v. Univ. of Texas at Austin*, 579 U.S. ____ (2016), citing Appendix. 220a available at http://www.supremecourt.gov/opinions/15pdf/14981_4g15.pdf (Alito, dissenting).

29. *Id.* At UT, as elsewhere in such a flexible, individualized process, white students may also be admitted because of their contribution to diversity. In OCR Case No. 11-04-2009, OCR found that North Carolina State University favorably considered "lower scoring white applicants" who "could be admitted because of a contribution to diversity, such as having come from a low-socioeconomic status or first-generation college status."

30. Particularly when race, ethnicity, and gender are considered as factors in the process, legal counsel should be engaged in an advisory role so that law-attentive design parameters can inform and support program design and execution.

Process Management: Integrity and Accountability for Individualized Holistic Review

I. Introduction and Overview

Despite the wide variability with respect to institutional interests and points of focus associated with holistic review, one common and critical element of effective practice emerges across institutional type: a commitment to rigor and ongoing evaluation as part of process management. That focus helps assure sustained integrity of admissions decision-making and success regarding desired outcomes.

At the core of a successful holistic review admissions program—or any admissions program—is **rigor, consistency, and fairness**. Because admissions touches so many stakeholders and is a foundational element of an institution's educational quality and contributions, the overall integrity of the admissions program, as defined by consideration of valid criteria that are applied consistently, is essential.

The vital role of professional judgment in a holistic review process does not obviate the importance of establishing, documenting, and reassessing over time the criteria to be considered in making admissions decisions through holistic review. Thus, emphasis and staff investments in the **development and periodic evaluation of evidence regarding relative success** in achieving mission-aligned goals are essential.

Finally, institutional leaders should model integrity of the process, oversee its legitimacy in relation to goals, empower and appropriately resource those responsible for carrying out the process, and charter collaboration among relevant functions within the institution.

II. Key Elements

A. RIGOR, CONSISTENCY, AND FAIRNESS

Consistent application of admissions criteria is an essential element of a holistic review process that is both fair and effective. This doesn't mean mechanical application of criteria, but rather that the same baseline criteria and the same process should govern the review of each applicant's file—even as particular criteria may apply differently in different circumstances. For example, an applicant's leadership potential may be assessed differently depending on the opportunities (or lack thereof) provided by each applicant's high school, family circumstances, and financial context; leadership respecting significant family obligations for one student may equate to another student's service as president of the student body. And, exemplary "engineering creativity and problem-solving ability" may be evidenced by a national science medal for one student from a private prep school and by the ingenuity of a student who is the child of migrant workers creating a solar-powered chili roaster used in the fields to cook lunch.³¹ Similarly, if race is a consideration in holistic review, it is one of many considerations for every applicant and may benefit an applicant of any race; there isn't a separate or additional criterion or review track or automatic plus based on the racial status of an individual. This aim for procedural consistency also extends to the establishing of baseline thresholds, such as bands of test scores that may trigger acceptance, rejection, or the need for further review with prospects for admission.³²

31. Brief for Massachusetts Institute of Technology, Leland Stanford Junior University, E. I. du Pont de Nemours and Company, International Business Machine Corp., National Academy of Sciences, National Academy of Engineering, and National Action Council for Minorities in Engineering, Inc. as Amicus Curiae Supporting Respondents, *Grutter v. Bollinger* 539 U.S. 306 (2003) (no. 02-241) and *Gratz v. Bollinger* 539 U.S. 244 (2003) (no. 02-516). ("Thus, to take a real life example, the design and construction of a solar-powered chili roaster by an applicant to meet the needs of his community of migrant farm workers in the Texas panhandle to cook

chilies for lunch in the fields, may tell as much about his creative engineering drive and motivation to be of service, as a national science medal does for another applicant.")

32. Reader rubrics are useful in helping assure that all readers understand the values of the admissions process and how each value may be evaluated. However, rather than simply adding up the points from an admissions rubric to arrive at a decision, the rubric should instead be used to guide readers' consistent application of thinking as they review applications and to queue them to institutional values.

Baselines of clear, mission-driven admissions criteria depend on an underlying rigor and fairness in process design—which is led by professionals in the field who “bring significant experience and expertise to the decision-making process.”³³ That rigor and fairness is most often demonstrated through a process involving multiple reviews by different admissions personnel; clear protocols for decision-making; and ongoing professional development and process and performance assessment that address any issues of reader variability.

Multiple reviews and clear protocols. Integrity of the process may be achieved differently, depending on the complexity and number of factors considered in holistic review, as well as practical considerations such as the volume of applications and resource constraints. In any event, a review by well-trained professionals and staff is a hallmark of effective holistic review practices. Applications often go through different phases of review, with a “preliminary recommendation to admit, defer, or deny,”³⁴ followed by further review and ultimate decision-making, which may be done by additional readers or a committee (who are sometimes “blind” to earlier reviews).³⁵

Such reviews may include a numerical assessment on multiple ratings scales and/or decision indices, along with written summaries of the applicant’s accomplishments, personal characteristics, and ability to contribute to the college community.³⁶ Then, after each application is evaluated, anywhere from one to three times, to reach a preliminary individualized decision, admissions leaders start the final decision process. At this stage, the composition of the class and how it meets institutional goals play a significant role. In the end, teams of admissions leaders and senior managers must work through “a complex calculus” across a broad set of considerations that include academic quality, tuition revenue, heterogeneity in its many forms, and support for academic and nonacademic programs.³⁷ All of this occurs in the context of the education and societal outcomes sought by the institution to achieve its mission.

Good practices for consistency in application of selection criteria also include reader protocols, which vary by institution. Availability of resources, the numbers of applications, and the selectivity of the institution factor into determining the application review approach that best suits an institution’s mission.

Common Protocols Reflective of Good Practice

- Multiple reviews of the same application by multiple readers, with further review if outcomes are significantly divergent;
- Use of a first reader to make a recommendation on an application, and a second reader to make the final decision;
- Use of two readers whose recommendations, if the same, are final, with a third reader making the final decision if the first two disagree; and
- Use of two simultaneous readers to make a recommendation on an application, and a third reader or committee making the final decision.

Variations on these basic models exist. Appendix B includes illustrations of such models.

Sources: Gretchen W. Rigol, *Admissions Decision-Making Models* (College Board, 2003), at 40, <https://research.collegeboard.org/publications/content/2012/05/admissions-decision-making-models-how-us-institutions-higher-education>; and Gretchen W. Rigol, *Selection Through Individualized Review* (College Board, 2004), at 21, available at <https://research.collegeboard.org/publications/content/2012/05/selection-through-individualized-review>.

33. Gretchen W. Rigol, *Selection Through Individualized Review* (College Board, 2004), at 17–18, 21–22, available at <https://research.collegeboard.org/publications/content/2012/05/selection-through-individualized-review>.

34. Lucido, *supra*, at 162–163.

35. *Id.*

36. *Id.*

37. Brief for the College Board, AACRAO, NACAC, and LSAC as Amici Curiae Supporting Respondents, *Fisher v. University of Texas at Austin*, 579 US __ (2016) (no.14-981) at 16–17, available at <http://educationcounsel.com/?publication=fisher-v-university-of-texas-u-s-supreme-court-amicus-brief-2015>.

On the Horizon: Committee-Based Evaluation

First implemented at the University of Pennsylvania in 2013 in response to the ballooning application volume in college admissions, committee-based evaluation (CBE) reflects an evolution of the traditional one-reader-at-a-time model, which employs two readers for the first read. Over 30 institutions of higher education have embraced CBE as part of their holistic review process. The primary aims of this new evaluation model are excellence in alignment with institutional mission, efficiency, professional development and staff retention, context for evaluators, and fairness, as well as reducing the effects of any implicit bias.

Process

- CBE uses two simultaneous readers, a “driver” and a “passenger,” who sit together while focusing on different aspects of the applicant.
- The driver is typically the geographic territory manager—having more intimate knowledge of the high school—who reviews the applicant’s academic credentials (e.g., transcript, test scores, recommendation, and course rigor).

- The passenger considers student voice or nonacademic factors (e.g., essays, interviews, and talents).
- The two readers discuss and “contextualize the applicant’s achievements,” write brief notes (instead of the lengthier summaries/narratives in the traditional model), and make a recommendation for a final third reader or committee.

CBE’s approach provides cross training when more experienced and less experienced readers are paired, enhances contextual knowledge when readers with different knowledge are paired, and reduces the time in the reading process (allowing more time for outreach) while deepening the understanding of applicants through dialogue.

Sources: Korn, Melissa, “Some Elite Colleges Review an Application in 8 Minutes (or Less),” *The Wall Street Journal* (January 31, 2018), retrieved from <https://www.wsj.com/articles/some-elite-colleges-review-an-application-in-8-minutes-or-less-1517400001>; “Working Smarter, Not Harder, in Admissions: A Team-Based Approach to Initial Reviews Can Often Save Time and May Allow for Better Evaluations,” *The Chronicle of Higher Education* (March 12, 2017), retrieved from <https://www.chronicle.com/article/Working-Smarter-Not-Harder/239456?cid=cp99>; Jaschik, Scott. “The New Way Colleges Review Applications,” *Inside Higher Ed* (June 12, 2017), retrieved from <https://www.insidehighered.com/admissions/article/2017/06/12/some-colleges-adopt-new-committee-based-system-doing-first-review>; “A Belief Change’ in Admissions,” *The Chronicle of Higher Education* (March 12, 2017), retrieved from <http://www.chronicle.com/article/A-Belief-Change-in/239452>.

Professional development and reader training.

Holistic review is strengthened when the process of review and decision-making is carried out with integrity by professionals in the field who have the requisite expertise, ethics, and training, and whose decisions are assessed and calibrated for effectiveness and consistency.

As part of reader calibration, “interrater reliability” may be used. The aim of interrater reliability is not for every reader to have the same opinion about an application or

group of applications, but rather to ensure “composite reliability” (consistency overall) in review by different readers of the same group of files, ratings within an acceptable range among readers of the same file, and calibration of leniency or severity of different readers.³⁸ Specific attention to calibration of reader severity or leniency in rating applications is important, particularly where only one reader is assigned to an application or where there is a significant divergence in ratings.³⁹

38. Emily J. Shaw and Glenn B. Milewski, *Consistency and Reliability in the Individualized Review of College Applicants* (College Board, 2004) at 1, available at <https://files.eric.ed.gov/fulltext/ED562634.pdf>.

39. Rigol, *supra* 34, at 21.

Calibration of readers may be achieved by:

- Appropriately frequent meetings among readers of a cluster of applications to explore their ratings and rationales, to identify any significant differences of approach/valuation/opinion, and to enable policymaking on how the differences should be resolved;⁴⁰
- Development and continuous, experience-based improvement of rules on how each component of an application (transcript, essays, letters of recommendation, etc.) will be weighted, a good practice for any approach to reader protocols;⁴¹ and
- Rigorous annual training prior to each admission cycle or ongoing at another appropriate time to support its effectiveness.

B. DEVELOPMENT AND PERIODIC EVALUATION OF EVIDENCE REGARDING RELATIVE SUCCESS AS A FOUNDATION FOR CONTINUOUS IMPROVEMENT

An admissions approach is only valuable if it is successful in advancing desired institutional mission-associated outcomes.⁴² Documenting and evaluating process design up front and as it is implemented over time, on a periodic ongoing basis, to determine whether the intended outcomes are being achieved and if there are any unintended consequences are important in holistic review. Such documentation and evaluation “can help admission officers and committees assess whether the school’s admission process has changed or is needed, whether the school is genuinely using a holistic review process, and the extent to which the policies and process are aligned with the institutional mission and goals.”⁴³

To sustain an effective admissions process, it is important to establish and implement a formal, deliberative, periodic evaluation of the process with the objectives of:

- Examining and documenting outcomes in light of the institution’s mission, relevant strategic plans, and related admissions goals and objectives;
- Determining the changing demographics, other environmental factors, and legal landscape that may portend a need to adjust goals or the means of achieving them;
- Considering staffing levels, quality and consistency of performance, as well as adequacy of training and other resources to maximize performance; and
- Determining and making any warranted changes in goals, processes, or resources to advance the institution’s mission, make the admissions process more successful in supporting such advancement, and fulfill requirements for legal compliance.

Illustration

Princeton University’s admission process involves application reviews by multiple readers at multiple stages. Each application is read by a “first reader” and then by a team coordinator (“second reader”), who then selects the most promising applications for consideration by regional admission committees and the dean or director of admission.

Source: Princeton Univ., Compl. No. 02-08- 6002 (U.S. Department of Education, Sept. 9, 2015) (compliance resolution), available at <https://www2.ed.gov/about/offices/list/ocr/docs/investigations/02086002-a.pdf>.

40. Shaw and Milewski, *supra*, at 4.

41. Shaw and Milewski, *supra*, at 2.

42. G. W. Rigol states, “it should be acknowledged that research and evaluation are an essential part of any admissions decision-making process. There can be many reasons why an institution has adopted a certain approach; however, it is ultimately valid only if it produces the desired results.” Rigol, *supra* 2, at 47.

43. AAMC, *supra*, at 23.

III. Engaged Leadership

Committed, engaged, informed leadership, beginning with the president and the board of trustees and extending across the institution at every level, is key to the success of holistic admissions. Leaders are important to:

- Empower and inspire commitment and collaboration across the enrollment management spectrum;
- Align admissions with curricular and cocurricular programs, as well as legal design parameters;
- Ensure implementation of a deliberative process, regular evaluation, and associated adjustments in the admissions program's goals, processes, and documentation;
- Make decisions and resource allocations that are evidence based; and
- Maintain consistent messaging, internally and externally, about institutional mission and goals and how admission, holistic review, and broad-based diversity support them.

An institution's board of trustees is often keenly interested in admissions. Trustees receive inquiries from friends, associates, and members of the public at the front and back end of the process, raising questions about the nature and fairness of the process. While trustees should not be involved in administering the process or making specific admissions decisions, as members of the ultimate governance authority of the institution it is important for trustees to understand admissions ethics and the governing board's role in maintaining high standards of integrity throughout the process. In their institutional oversight role, trustees also need a good grounding in the nature, complexity, fairness, and evidence-based decision-making that define the process: the connection of holistic admissions to institutional mission, the relative role of quantitative and qualitative factors, the considerable expertise that guides decision-making, the steps taken to ensure consistency and fairness, and the disciplined, evaluative process that ensures process corrections when needed for successful, mission-driven outcomes.

Illustration

Rice University's Board of Trustees and Faculty Council separately adopted resolutions confirming the educational benefits of diversity, based on research and the experiences of Rice's faculty. Both resolutions supported the necessity of continued efforts to foster diversity.

Source: Rice Univ., Compl. No. 06-05-2020 (U.S. Department of Education, Sept. 10, 2013) (compliance resolution), available at <http://www.ed.gov/about/offices/list/ocr/docs/investigations/06052020-a.html> (last modified Jan. 14, 2015).

CONCLUSION

Effective and sustainable holistic review policies and practices are dependent on clear, mission-driven factors that are important to consider when making judgments affecting student admissions. Processes that reflect integrity, rigor, fairness, and accountability for results in implementation also define effective holistic review. However, more than good design and implementation are required to engender stakeholder and public trust in admissions programs—and, more generally, in institutions of higher education.

Any seasoned professional in the field of admissions knows the importance of having a well-developed communications and engagement strategy. No admissions cycle passes without disappointed students (and parents). By definition, admissions decisions result in acceptances and rejections; and such consequential decisions—viewed through a lens of immediate, short-term individual interest, rather than longer-term effects and interests—often generate claims of unfairness in the process. In some instances, those claims make their way to the public sphere, including in court litigation or agency investigation. Even without legal consequences, the perception of admission as a “black box” raises questions of process integrity and, at worst, can undermine public trust in higher education.

To be sure, complete transparency to the public is impossible to achieve. Indeed, the real question is one of “how much” and “in what detail” to share information on the process and reasoning of decisions. There isn’t an easy answer, but in this time of cynicism and distrust,⁴⁴ a broad imperative associated with better communications and engagement exists: Greater transparency would present important opportunities to better achieve the mission-driven objectives of admission by building public understanding of the broadly beneficial objectives and fairness of the process for all students and for society at large. With that increased understanding would come opportunities to build public support of higher education more generally.

That level of communications and engagement implicates new terrain for many, as postsecondary institutions have not consistently communicated the vision, rationale, and logic of their admission decisions to the public, to federal and state legislators, and even to the extended campus community of alumni and donors. Indeed, somewhat ironically, it is only within defensive litigation contexts that institutions have most effectively told their admissions stories, including design rationales, descriptions of calibrated and fair processes, and the steadfast commitment of higher education professionals to student and institutional success. It is also within this limited context that we’ve heard most loudly and clearly from industry and military leaders about their support of diversity and holistic higher education admissions policies that are critical to economic, civic, and national security interests of the nation. Good policy counsels a broader approach—with proactive, collaborative, and sustained communication efforts meeting high standards of effectiveness.

In sum, the public would be better positioned to support higher education’s judgment on admissions criteria and processes (and funding for higher education, for that matter) if the public had a clearer understanding of the basic objectives of the admissions process, what criteria and processes are used, and why the criteria and process are both fair and serve critical national and societal interests, as well as the interests of all students.

The value of transparency and an effective communications strategy, focused on resonating with the campus community, the general public, and federal and state legislatures; and carried out in an ongoing collaboration among higher education, industry, and military sectors, cannot be understated.

44. There is considerable and increasing societal misperceptions of, distrust in, and devaluation of higher education in American society. See Peter Salovey, “How to Sway Higher Ed’s Skeptics,” *The Chronicle of Higher Education* (February 2018), available at https://www.chronicle.com/article/How-to-Sway-Higher-Ed-s/242645?cid=wcontentgrid_40_2; Pew Research Center, *Sharp Partisan Divisions in Views of National Institutions* (July 2017),

available at <http://www.people-press.org/2017/07/10/sharp-partisan-divisions-in-views-of-national-institutions/>; and Molly Corbett Broad, “Educating the Public on the Value of a College Degree,” *The Chronicle of Higher Education* (May 2017), available at <https://www.chronicle.com/article/Educating-the-Public-on-the/240005>.

Principal Resources

- The “Rigol series,” published by the College Board:
 - ♦ *Toward a Taxonomy of the Admissions Decision-Making Process* (1999) <https://research.collegeboard.org/publications/content/2012/05/toward-taxonomy-admissions-decision-making-process>
 - ♦ *Best Practices in Admissions Decisions* (2002) <https://research.collegeboard.org/publications/content/2012/05/best-practices-admissions-decisions>
 - ♦ *Admissions Decision-Making Models* (2003) <https://research.collegeboard.org/publications/content/2012/05/admissions-decision-making-models-how-us-institutions-higher-education>
 - ♦ *Selection Through Individualized Review* (2004) <https://research.collegeboard.org/publications/content/2012/05/selection-through-individualized-review>
- College Board (2017), *Future Admissions Tools and Models*. <https://professionals.collegeboard.org/higher-ed/future-admissions-tools-and-models-initiative>
 - ♦ This document is published as part of the College Board’s Future Admissions Tools and Models Initiative and contains five parts: *Introduction*, *Exploring a New Framework for Sorting Applicants*, *Data-Driven Models to Understand Environmental Context*, *Insights into Nonacademic Factors and Practice*, and *Innovative Practices of Interest on Campus*
- Lucido, J. A. (2015), “How Admission Decisions Get Made.” In *Handbook of Strategic Enrollment Management* (pp. 147–173). San Francisco: Jossey-Bass, A Wiley Brand.
- Association of American Medical Colleges (2010). *Roadmap to Diversity: Integrating Holistic Review Practices into Medical School Admission Processes*. <https://members.aamc.org/eweb/upload/Roadmap%20to%20Diversity%20Integrating%20Holistic%20Review.pdf>
- Espinosa, L. L., M. N. Gaertner, and G. Orfield (2015). *Race, Class, and College Access: Achieving Diversity in a Shifting Legal Landscape*. Washington, DC: American Council on Education. <http://www.acenet.edu/news-room/Documents/Race-Class-and-College-Access-Achieving-Diversity-in-a-Shifting-Legal-Landscape.pdf>
- Coleman, A. L. and T. E. Taylor (2017). *Building an Evidence Base: Important Foundations for Institutions of Higher Education Advancing Education Goals Associated with Student Diversity*. Washington, DC: The College Board. <https://professionals.collegeboard.org/pdf/building-evidence-base.pdf>
- *Grutter v. Bollinger*, 539 U.S. 306 (2003)
- *Gratz v. Bollinger*, 539 U.S. 244 (2003)
- *Fisher v. Univ. of Texas at Austin*, 570 U.S. ____ (2013)
- *Fisher v. Univ. of Texas at Austin*, 579 U.S. ____ (2016)
- Brief for the College Board, AACRAO, NACAC, and LSAC as Amici Curiae Supporting Respondents, *Fisher v. University of Texas at Austin*, 579 US _ (2016) (no.14-981). <http://educationcounsel.com/?publication=fisher-v-university-of-texas-u-s-supreme-court-amicus-brief-2015>
- Brief for American Council on Education and 37 Other Higher Education Organizations as Amici Curiae Supporting Respondents, *Fisher v. University of Texas at Austin*, 579 US _ (2016) (no.14-981). <http://www.acenet.edu/news-room/Documents/Amicus-Brief-US-Supreme-Court-FisherII.pdf>
- Brief for the Association of American Medical Colleges et al. as Amici Curiae Supporting Respondents, *Fisher v. University of Texas at Austin*, 579 US _ (2016) (no.14-981). <https://www.aamc.org/download/447744/data/aamcfilesamicusbriefinfishervutaustin.pdf>
- Amicus briefs filed in *Fisher II*, available at <http://www.scotusblog.com/case-files/cases/fisher-v-university-of-texas-at-austin-2/>

- Amicus briefs filed in *Grutter* and *Gratz*, including Brief for Massachusetts Institute of Technology, Leland Stanford Junior University, E. I. du Pont de Nemours and Company, International Business Machine Corp., National Academy of Sciences, National Academy of Engineering, and National Action Council for Minorities in Engineering, Inc., as Amicus Curiae Supporting Respondents,
- U.S. Department of Education Office for Civil Rights Case Resolutions:
 - ♦ Princeton Univ., Compl. No. 02-08- 6002 (U.S. Department of Education, Sept. 9, 2015) (compliance resolution), available at <https://www2.ed.gov/about/offices/list/ocr/docs/investigations/02086002-a.pdf>;
 - ♦ Univ. of North Carolina, Compl. No. 11-07-2016 (U.S. Dep't of Educ. November 27, 2012) (letter of findings), available at <https://www2.ed.gov/about/offices/list/ocr/docs/investigations/11072016-a.pdf>;
 - ♦ Rice Univ., Compl. No. 06-05-2020 (U.S. Department of Education, Sept. 10, 2013) (compliance resolution), available at <http://www.ed.gov/about/offices/list/ocr/docs/investigations/06052020-a.html> (last modified Jan. 14, 2015);
 - ♦ North Carolina State University. Compl. No. 11-04-2009 (U.S. Department of Education, November 27, 2012) (letter of findings), available at <https://www2.ed.gov/about/offices/list/ocr/docs/investigations/11042009-a.pdf>; and
 - ♦ University of Virginia, Compl. No. 11-03-2072 (U.S. Department of Education, March 19, 2013) (letter of findings).

Federal Nondiscrimination Law in a Nutshell

Federal nondiscrimination laws govern the consideration of race, ethnicity, and other factors in higher education in admissions. Public and private institutions that receive federal funding are subject to the same basic standards of review. State laws that impose greater restrictions or additional requirements may also apply.

With respect to considerations of race and ethnicity in admissions, federal courts apply a “strict scrutiny” standard of review.⁴⁵ Cases reflect the expectation that such policies will be supported by:

- **Clear, research- and experienced-based goals, with rationales.** The institution should explain the specific diversity-associated educational outcomes sought to benefit all students; and why, in the institution’s experience and judgment, broadly defined student body diversity (including, but not limited to race and ethnicity) is needed to achieve those outcomes.
- **Well-designed means.** Holistic review in admissions should involve the application of the same criteria, standards, and process to every applicant—even as various factors may apply differently with different applicants. Race should be considered flexibly and individually, not mechanically or rigidly, for every applicant, as a context to understand the applicant’s experiences, challenges, and accomplishments. (Race should not be considered in the same way or given the same weight for all individuals who are of the same race.) Admissions should not reflect, with respect to race and ethnicity:
 - ♦ Numerical quotas;
 - ♦ Mechanically applied points;
 - ♦ Separate processes/tracks or opportunities for review; or
 - ♦ A thumb-on-the-scale preference.

Race-neutral considerations should dominate across the enrollment management spectrum, with race being considered in a limited, contextual manner only where needed to achieve desired goals.

- **Evidence of need.** The institution’s opinion regarding diversity goals and policy designs isn’t enough. Evidence should demonstrate that considering race in the manner contemplated or pursued is necessary because (1) race-neutral strategies, while used and having an impact, alone aren’t adequate to meet diversity-associated institutional goals, (2) the diversity already existing at the institution or in clusters of relevant courses/settings isn’t adequate (e.g., where students still feel isolated based on race and lack substantial diverse learning opportunities), and (3) those strategies that do involve consideration of race are effective, but not overly burdensome on others.

45. This distillation of portions of federal nondiscrimination law is not intended to provide a full or comprehensive overview of all potentially relevant factors that an institution may need to consider when evaluating legal exposure. Enrollment officials should consult with their attorneys on issues presented here.

Evidence and the requirements of federal nondiscrimination law.

When race and ethnicity, and likely gender, are considered in a holistic review of the admissions process, applicable law—and good policy supporting effective strategies and efficient resource allocation—requires an institution to develop a quantitative and qualitative evidence base that demonstrates the need to consider race, ethnicity, and gender as a means to advance the institution's diversity-associated educational and societal goals. This requires consideration of both the goals themselves and the means of achieving the goals—in relation to the student experience. The College Board's *Building an Evidence Base*, available at <https://collegeboard.org/accessanddiversity>, provides guidance on how to build, assess on an ongoing basis, and use the necessary evidence base, which is grounded in research and good practices of institutions of higher education whose race-conscious processes have survived legal challenges.

If the institution can articulate and document a logical, reasonable explanation of its compelling education-outcome-based goal and the core connection of broad diversity to that goal, it has provided the necessary evidence base for goals.

Note, however, that building an evidence base is not a static process; it is one that must be repeated on an ongoing, periodic basis, so that evidence-based judgments can be affirmed or changed to meet institutional, societal, and other relevant contextual changes. *Building an Evidence Base* provides guidance on the existing documents and processes that institutions can use for this purpose, including mission statements, strategic plans, leader and faculty statements, etc.

Sources: See the following Access & Diversity Collaborative resources at <https://professionals.collegeboard.org/higher-ed/access-and-diversity-collaborative/resource-library>, including:

- *Unpacking Fisher II and its Possible Implications for Institutions* (2016);
- *Understanding Fisher v. University of Texas: Policy Implications of What the U.S. Supreme Court Did (and Didn't) Say About Diversity and the Use of Race and Ethnicity in College Admissions* (2013);
- *Bridging the Research to Practice Gap: Achieving Mission-Driven Diversity and Inclusion Goals* (The College Board, 2016);
- *A Policy and Legal "Syllabus" for Diversity Programs at Colleges and Universities* (The College Board, 2015); and
- *The Playbook: A Guide to Assist Institutions of Higher Education in Evaluating Race- and Ethnicity-Neutral Policies in Support of the Mission-Related Diversity Goals* (2014).

See also, *University of California Regents v. Bakke*, 438 U.S. 265 (1978); *Grutter v. Bollinger*, 539 U.S. 306 (2003); *Gratz v. Bollinger*, 539 U.S. 244 (2003); *Fisher v. Univ. of Texas at Austin*, 570 U.S. ____ (2013); *Fisher v. Univ. of Texas at Austin*, 579 U.S. ____ (2016). Note that the goal of mirroring in the student body the same percentage of racial minorities as exist in the state or nation, has been held by the Supreme Court to be unconstitutional "racial balancing," and is not a legally legitimate or sustainable goal. Awareness of societal demographics is still relevant to educational-outcome-focused goals; however, as all students must learn to work, live, and socialize with a broad diversity of peers if they are to contribute productively as citizens, serve diverse constituencies in their particular professions or jobs, and fulfill workforce and civic needs.

Admissions Protocols

Common protocols reflective of good practice include:

- Multiple reviews of the same application by multiple readers, with further review if outcomes are significantly divergent;
- Use of a first reader to make a recommendation on an application, and a second reader to make the final decision; and
- Use of two readers whose recommendation, if the same, is final, with a third reader making the final decision if the first two disagree.

Adaptations of these protocols may reflect:

- Use of one senior staff reader, who reviews a “summary card” for all applicants or who must give final approval of all decisions through some other means, or use of a small number of senior team leaders who must give final approval of all decisions in their respective team clusters—in any such model, with an eye toward consistency and integrity in relation to criteria;⁴⁶
- Use of one senior reader per region who makes the decision on applicants who aren’t automatically admitted based on fixed, quantitative criteria (an approach used by moderately selective private and public institutions (admitting 50%–90% of applicants));⁴⁷

- Use of one or more readers who prepare a summary, including specifically required information, with the one or the lead reader presenting the file to a committee that makes the final decision by vote (an approach used by selective institutions, with adequate resources to devote this level of review);⁴⁸
- Team readers, each of whom has a particular focus, with the team ultimately assigning a rating, or team readers who make the decision when there is consensus among sufficient numbers in the team (an approach used by selective institutions of varying sizes, public and private);⁴⁹ and
- Use of two readers to assign ratings to an application, with a third reader becoming involved if there is deviation between the first two readers’ ratings that is significant (e.g., more than .5 or 1.0 points).⁵⁰

46. Gretchen W. Rigol, *supra* 34, at 21.

47. Rigol, *supra* 1, at 41.

48. Rigol, *supra* 34, at 39–40.

49. *Id.*, at 40.

50. Rigol, *supra* 1, at 21.

The College Board's Access & Diversity Collaborative

The College Board's Access & Diversity Collaborative (ADC), now in its 14th year, continues to provide national leadership and institutional support focused on higher education diversity goals. Working with core partner institutions of higher education and national organizations, the ADC addresses key issues that surface in the full range of enrollment policies and practices through a convening, stakeholder outreach and engagement, actionable research, policy and practice publications, and web-based tools and resources.

The ADC is poised to continue and enhance its strategic aims and service to higher education institutions and organizations in coming years, as:

- **A voice of national advocacy**, grounded in balance and reason, for the continuation of robust, research/practice based, and lawful access and diversity policies that are aligned with 21st-century career and citizenship goals.
- **A resource for sophisticated and pragmatic policy and practice guidance and actionable research** to support institutional mission-based goals in light of relevant law, including a focus on the promotion and expansion of pathways and more robust opportunities for historically underserved youth (including minority, low-income, and disadvantaged youth).
- **A convener for thought leadership and collaborative engagement on policy and practice development**, with a focus on:
 - ♦ The effective use of data and support for research connected to “real-world” policy and practice issues (nationally and as a matter of institutional policy);
 - ♦ The identification and development of replicable best practices that reflect sound policy and that are legally sustainable; and
 - ♦ The facilitation/mitigation of polarizing positions in pursuit of meaningful common ground—to support the development of a principled and pragmatic policy and practice agenda.

In each of these roles, the ADC will continue its tradition of leadership driven by research and sound educational practice—informed by ongoing, multifaceted engagement with educators and policy leaders committed to principles of expanding and enhancing access, opportunity, and meaningful educational experiences for all students as they prepare for careers and citizenship in the 21st century.

The Access & Diversity Collaborative relies heavily on the support and guidance of its 57 institutional and 13 organizational sponsors in identifying challenges and opportunities and making recommendations regarding strategic direction for ADC's work. Other primary benefits of sponsorship are:

- Receipt of regular sponsor-only updates of relevant policy, legal, and research developments and an invitation to an annual sponsors-only meeting at the College Board Forum; and
- Recognition as a sponsor on the ADC website and in other relevant College Board program materials, including the College Board's annual Forum and Higher Ed Colloquium promotional materials.
- For additional information, see diversitycollaborative.collegeboard.org.

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About the College Board

The College Board is a mission-driven not-for-profit organization that connects students to college success and opportunity. Founded in 1900, the College Board was created to expand access to higher education. Today, the membership association is made up of over 6,000 of the world's leading educational institutions and is dedicated to promoting excellence and equity in education. Each year, the College Board helps more than seven million students prepare for a successful transition to college through programs and services in college readiness and college success—including the SAT® and the Advanced Placement Program®. The organization also serves the education community through research and advocacy on behalf of students, educators, and schools.

For further information, visit collegeboard.org.

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EducationCounsel is a mission-driven education consulting firm that works with leading nonprofit organizations, foundations, education leaders, and policymakers to help significantly improve education opportunity and outcomes, with a focus on equity issues. We work with education partners at the state, federal, and institutional or local levels to advance evidence-based innovations and systems change. We do this by leveraging policy, strategy, law, and advocacy to help transform education systems, from early learning to K–12 to higher education.

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