

November 18th, 2025

Re: HB 326

Honorable Members of the House Education Committee

Dear Chair Fowler Arthur and Members:

Thank you for the opportunity to provide written testimony on HB 326. Despite ACT's neutral position at this time, our organization would like to provide clarity surrounding previous testimony given by supporters of this legislation. We also recommend one change we believe would improve this bill.

ACT is a national testing organization grounded in more than 65 years of education and workforce research. ACT's learning resources, assessments, research, and work-ready credentials are trusted by students, job seekers, educators, schools, government agencies, and employers as effective, valid, and reliable solutions to help people achieve their education and career goals at every stage of life.

The stated intent of the bill's author is to require institutions of higher education to recognize the Classic Learning Test (CLT) as a valid college admissions exam under Ohio law.

While ACT is not opposed to competition in the marketplace, it is essential that competition should lead to higher standards for the benefit of all stakeholders. ACT welcomes any test to the market that is grounded in research, provides ample validity evidence of being a predictor of college success, and maintains industry standards for high stakes testing. ACT has strong reservations about CLT's use for college admissions given the lack of published test validity evidence.

ACT recommends adding the requirement for an independent study to be conducted by Ohio Department of Higher Education prior to the selection of admissions assessments for public colleges and universities.

There is no validity research in the 2024 CLT technical report that supports the use of scores for high-stakes college admissions decisions. The CLT technical report chapter on validity is void of information regarding the relationship between CLT test scores and any measure of college or high school performance. As a point of contrast, the ACT technical report chapter on validity provides not one but several studies that establish the relationship between ACT scores and educational outcomes such as the likelihood of college success, which is why the ACT is widely and confidently used for college admissions and course placement decisions. We believe that providing this evidence base is a minimum requirement given the weight of decisions that are made based on our test.

Given the substantial work we have done to validate the ACT, we are concerned that CLT is being fast-tracked for the same high stakes use without enough evidence. To date, CLI has published only one research study on its website, and this single study is based on a small, non-representative sample of students from a single small college. The study did not evaluate whether CLT test scores had predictive validity of college readiness above and beyond high school grades / coursework and did not provide a valid comparison of predictive validity with ACT or SAT scores. This study does not meet industry standards for test validity evidence.

Beyond this study, we have other concerns about claims CLI has publicly made on their website. Students and colleges need tools to compare and translate between scores on different assessments, however, the concordance provided by CLT is provided for the benefit of one exam's market share (the CLT) and does not follow industry expectations for this type of research. In fact, the CLT "concordance" that is purported to show equivalent scores between the CLT and the ACT uses no ACT data whatsoever. Neither ACT nor the College Board approves, supports, or endorses Classic Learning Initiatives (CLI) claims from their concordance study.

An independent review of the CLT by the Iowa Board of Regents reiterates these concerns.ⁱ The Florida Department of Education conducted research that indicates the score comparisons provided by CLI for the CLT were inflated, especially in math, which created an uneven playing field and skewed the state's graduation and accountability ratings for 2 years.ⁱⁱ

Given these concerns about the lack of published research on the CLT, or the linkage between the CLT and well-researched measures like the ACT and SAT, an amendment in the interest of neutrality should be added if HB 326 is to proceed through the legislative process.

We appreciate your consideration of these concerns and want to assure you that we are committed to ensuring access, merit, and improved education and workplace outcomes for all Ohio students and helping to ensure the future prosperity of the state.

Respectfully,

Mary LeFebvre

Senior Director of State Government Relations

ⁱ https://www.iowaregents.edu/media/cms/0424_AAC_9_Classic_Learning_Test_259B31C272A96.pdf

ⁱⁱ See Table 4 where CLT quantitative reasoning scores were raised from an 11 to a 14 for students entering grade 9 in 2022-2023 vs. 2020-2021. https://core-docs.s3.us-east-1.amazonaws.com/documents/asset/uploaded_file/5427/WAC/5893960/GradRequireFSA.pdf