



Australian Government

Department of Immigration
and Border Protection

Review of the implementation of alternative English language proficiency tests in the Student visa programme

2013





Contents

1. Introduction.....	4
2. Key findings.....	5
3. Objectives, scope and conduct of review.....	6
3.1 Objectives.....	6
3.2 Scope	7
3.3 Conduct of review	7
4. Overview of English tests and providers.....	10
5. Assessment findings	10
5.1 Responses from providers	11
5.2 Interviews with providers.....	14
5.3 Survey of visa processing staff	16
5.4 Survey of Student visa applicants.....	17
5.5 Quantitative analysis of English language test data	18
5.6 Feedback from relevant stakeholders in the Department	23
6. Effectiveness of meeting Student visa programme objectives	24
7. Suitability for other visa programmes.....	26
8. Conclusion.....	28
Attachment A: Terms of Reference.....	30
Attachment B: Summary of providers' written submissions.....	34
Attachment C: Interview questions for providers	42
Attachment D: Survey of visa processing staff	43
Attachment E: Student survey feedback.....	48
Attachment F: Student Survey results (DIAC blog)	51
Attachment G: Key stakeholders consulted during the review	54
Attachment H: Written submissions from alternative English language test providers.....	55

1. Introduction

The Department uses English language requirements to protect the integrity of Australia's visa programmes, and to ensure visa holders are able to safely participate in Australian society.

English language requirements generally apply across the Student and Skilled visa programmes and are prescribed in the *Migration Regulations 1994*. Required evidence of English language proficiency differs across visa subclasses to reflect the different objectives of respective visa programmes. For example, a Student visa applicant's English language ability should allow them to successfully complete a course of study in Australia; whereas a Skilled visa applicant must demonstrate that their general English ability will allow them to successfully participate in the labour market.

Providing a test score from a prescribed English language test is one type of evidence of English language proficiency accepted by the Department – other kinds of evidence may include being the passport holder of a specified country or by providing evidence of previous study in English.

Prior to November 2011, the main English language test taken by visa applicants required to provide the Department with evidence of their English language proficiency was the International English Language Testing System (IELTS). The Test of English as a Foreign Language (TOEFL) computer, paper and internet based (iBT) tests were approved as alternative tests in certain countries¹ where IELTS was not available. Following a competitive selection process, three alternative English language tests were accepted by the Department for all countries for Student visa purposes from 5 November 2011:

- TOEFL iBT;
- Cambridge English: Advanced (CAE); and
- Pearson Test of English Academic (PTE).

These tests were added to respond to a shortage of test places, and to also create competition in the English language testing market. The Occupational English Test (OET) is also an alternative test to IELTS, however the OET test has been an approved English language test for Student visa purposes since 2002, and therefore is not included in this review.

The selection of the additional tests followed careful assessment against benchmark criteria which were established in May 2008 to assess submissions by additional English language test providers to deliver English language tests that met the Student visa programme requirements. There were two rounds of submissions by interested English language test providers, with the first submissions lodged by December 2009 and the second round by March 2011. The second round of submissions allowed English language test providers that were previously assessed as unsuccessful to provide further information.

The announcement of the introduction of alternative English language tests for the Student visa programme foreshadowed that the implementation of the new tests would be closely monitored and reviewed with the key purpose of determining whether the tests should be available for other visa applicants in other programmes. Another purpose of the review would be that the effectiveness of the tests meet the objectives of the Student visa programme².

¹ Prior to May 2011, TOEFL computer, paper and internet based tests were approved for use in the following countries: Belarus; Ecuador; El Salvador; Guatemala; Honduras; Kyrgyzstan; Mali; Moldova; Solomon Islands; Suriname; Tajikistan; Tanzania; Uganda; and Uzbekistan.

² The key objective of the Student Visa Programme is to contribute to Australia's society and economy by facilitating the lawful entry and temporary stay of international students.

This is the first review of English language testing arrangements in the Student visa programme. The review period covers English language tests conducted from December 2011 to November 2012 with the review process being governed by the agreed Terms of Reference at [Attachment A](#).

The current review assessment is based on service delivery deeds of agreements that the Department has with each English test provider, and assesses test delivery integrity, content of tests, administration of tests including online verification services and standards in delivery of test results. The review assessment criteria are similar to the initial submission assessment benchmarks established in 2008.

In December 2011, providers of the alternative English language tests were advised that a review of the implementation of the new arrangements would commence in January 2013, approximately twelve months after the new tests had been introduced. Feedback was sought from the providers on the broad focus of the review so that the review Terms of Reference could be developed and made available. Consultations also commenced with relevant policy and operational areas to ensure that the review ToR met their expectations. The review criteria focussed on the mandatory requirements which were part of the initial assessment in the approval of additional English language tests for the Student visa programme. The Terms of Reference for this review ([Attachment A](#)) were released in October 2012.

In developing the review framework for the alternative tests, a broader periodic review of English language test services used for visa programmes was also introduced. A Review of English language testing arrangements with all test providers is proposed for 2015 and every two years thereafter. Periodic reviews of English language test arrangements are also conducted with all test providers prior to the expiry of service delivery agreements with the Department.

2. Key findings

Following analysis of submissions, quantitative data, interviews and survey results, the Department is satisfied that the Test of English as a Foreign Language (TOEFL) internet-based test (iBT), Cambridge: CAE and Pearson English language tests met the objectives of the Student visa programme during the review period.

In terms of fulfilling service delivery deed of agreement obligations, all providers demonstrated that they updated their test content regularly, employed trained markers and invigilators and implemented standardised testing conditions in all test centres. Their storage of test material and availability for audit purposes by the Department complied with the requirements for the Student visa programme. Security measures for internet based testing, minimising risk of identity substitution and document fraud were also of a high standard.

All alternative English language test providers are working closely with the Department and the National Allegation Assessment Team in South Australia in reporting fraud incidents at various test centres. The service delivery agreements with each provider will be amended to ensure reporting obligations of fraud. This responds to ETS inadvertently only reporting instances of fraud to the relevant offshore departmental office instead of using the correct pathway of reporting to the National Allegation Assessment Team (NAAT) located in South Australia.

During the first 12 months of operation, all alternative English language tests were used by the cohort of Student visa applicants with test score results submitted with their visa applications.

Alternative English language proficiency tests represented 3 per cent of Student visa applications lodged where the Department assessed the English language requirements. The residual 97 per cent of applicants submitted either an IELTS or an OET test result. During the review period, 16,143 Student visa applicants completed an English language test which was subsequently submitted for assessment by the Department.

	IELTS	OET	CAE	PTE	TOEFL/IBT	Total
% of total tests	97.21%	0.02%	0.02%	0.81%	1.93%	100%

Source: DIBP (R0879)

Alternative English language test providers consider that it may take longer than 12 months to gain a larger market share of English language testing for Australian students. Providers have invested considerable effort in gaining recognition by the Australian education sector of the new alternative English language tests which is expected to lead to increased take-up by prospective students.

All alternative English language tests were delivered according to the service delivery agreement obligations relating to integrity, content and administrative arrangements in conducting tests globally. While all alternative English language test providers have online verification systems and access processes, the different arrangements were not always familiar to visa processing staff. A further round of training or a rolling training programme may need to be considered by alternative English language test providers so that visa processing staff are more familiar with online verification systems.

The Department is currently examining the risks and benefits associated with the proposed expansion of the alternative tests to other visa programmes.

3. Objectives, scope and conduct of review

3.1 Objectives

There are two primary objectives in conducting this review of alternative English language tests in the Student visa programme: the first is to establish the effectiveness of the newly implemented tests in meeting the objectives of the Student visa programme; the second is to use the outcomes of the review to form a basis for considering whether to introduce the alternative English language tests to other visa programmes.

The assessment of effectiveness in meeting the Student visa programme objectives is largely based on whether the English language test providers have met their obligations in delivering services according to the standards as outlined in the service delivery deed of agreement.

The four main areas within the service delivery standards for English language tests outlined in the service delivery agreement are:

- integrity of conducting tests
- contents of tests
- administration arrangements in conducting tests; and
- results validity and information.

In addition to the service delivery standards, the current review also includes specific requirements regarding online verification services delivered during the first 12 months of operation. Under section five of the review assessment criteria, English language test providers must provide evidence of having delivered online verification services for the Department in a timely and helpful way, including evidence that the provider has been responsive to the Department's requests for information relating to suspected fraud and other integrity measures.

Another assessment criteria focuses on providers' obligations in the service delivery deed of agreement in respect to security procedure obligations and reporting of any security incidents. This assessment criterion has been included in the integrity service standards as 1(c) in the Terms of Reference as:

Suspected or proven incidents of fraud have been reported in a timely fashion to the Department, and reports have included the steps taken by the Service provider to address them.

Analysis of the second key objective of the review, to identify whether the alternative tests should be expanded to other visa programmes, is not intended to be detailed as individual policy areas will assess the need and impact of multiple English language tests being available for use by visa applicants within respective visa programmes.

3.2 Scope

The review scope is based on the agreed and final Terms of Reference assessment criteria which were distributed to English language test providers. The current review assessment criteria take into account the mandatory benchmark criteria that were developed to conduct the initial assessments in 2009 and 2011 of submissions from alternative English language test providers.

The review scope does not include assessment of service delivery by IELTS and OET. Where relevant, comparison may be made with IELTS and OET, however, the review criteria are limited to the service delivery obligations of alternative providers that were accepted for Student visa purposes from 5 November 2011: TOEFL iBT, Cambridge English: Advanced and Pearson Test of English Academic. Analysis of English language requirements and competency levels that are specified for various visa categories is also out of scope of the current review.

The review period covers the first 12 months of operation of the alternative English language tests from December 2011 to November 2012. The service delivery Deeds of Agreement with the new providers were finalised in November 2011 and are due to expire in November 2013.

3.3 Conduct of review

The review was conducted by the English language testing policy sub-section within Bridging Visa (ABC) Policy Section of Visa Framework and Family Policy Branch. English language testing policy functions were transferred to this branch soon after the announcement in May 2011 of the alternative English language testing arrangements. Responsibility for English language visa policy has since been transferred to Education, Tourism and International Arrangements branch.

The review evaluates information from five main sources as outlined in the review Terms of Reference. They include:

- English language test providers' written statements and submitted evidence;
- information obtained during interviews with English language test providers;
- feedback from relevant departmental internal stakeholders namely the National Allegation Assessment Team (NAAT) in South Australia and Student visa policy section;
- quantitative data obtained from departmental systems, including analysis of data undertaken by visa programme owners; and
- survey feedback from student visa holders who have undertaken the alternative English tests and visa processing staff who may have assessed visa applications where one of the alternative English tests was submitted.

Submissions from alternative English test providers

Responses from all three providers were received by 18 January 2013 as requested in the review advice. Responses were assessed initially by the review team in the Bridging Visa (ABC) Policy Section and comments were sought from the NAAT in South Australia.

Additional questions and further clarification of responses were referred to providers in preparation for their interviews with the review team.

Interviews with providers

Telephone conference interviews were preferred and offered to all three providers, however, due to their commitments, it was more convenient for all providers to attend interviews in person. Informal interviews were held with all providers to discuss their initial responses with further information being submitted by the providers in response to subsequent questions and clarifications sought by the review team.

The aim of the interviews was to confirm responses and where appropriate also consider any new information that may be relevant in how the providers delivered their language test services.

Feedback from relevant departmental internal stakeholders

The review team sought feedback on the providers' submissions from the NAAT in South Australia. Feedback was also sought on the providers' submissions from the Student Policy, Student Projects Policy and Student Implementation Taskforce Sections. Within the Skilled visa programme areas, feedback was sought from the Human Capital Policy Section which is responsible for the points tested visa subclasses within the SkillSelect visa programme.

Quantitative data analysis

During the first 12 months of operation of the alternative English language testing arrangements, 447 student visa applicants completed one of the alternative English language tests as follows:

TOEFL/iBT = 312 (70%) PTE = 131 (29%) CAE = 4 (1%)

Of the total alternative English language tests, 70 per cent of student visa applicants submitted TOEFL/iBT, 29 per cent of students selected PTE with 1 per cent submitting CAE with their student visa applications. Of the 312 TOEFL tests submitted, 309 or 99 per cent were internet based TOEFL iBT.

Only 5 per cent (20) of the alternative tests were conducted in Australia with the remaining 95 per cent (427) conducted outside of Australia. This compares to 20 per cent of IELTS and OET tests conducted in Australia during the same period by Student visa applicants.

In comparison, during the same 12 month period, 15,693 Student visa applicants completed an IELTS test and 3 applicants completed an OET test. Alternative English language tested Student visa applicants represented 3 per cent of 16,143 total Student visa applicants who completed an English language test. The residual 97 per cent of students completed an IELTS test during the 12 month review period.

During the same 12 month period, 233,843 Student visa applications by primary visa applicants were lodged with the Department. It is important to note that Streamlined Visa Processing arrangements for certain students commenced in March 2012 which allowed participating universities to assess whether an eligible student had appropriate level of English for the intended course of study as part of their enrolment/admission process. Following these changes, fewer Student visa applications lodged with the Department contained English language test results as these would have been provided to the participating university.

More detailed analysis of Student visa application data is presented in sections 5.4 and 5.5 of this report.

Survey of Student visa processing staff

In December 2012, a brief questionnaire was prepared via the SurveyMonkey® facility to obtain feedback from Student visa processing staff in London, New Delhi, Melbourne and Adelaide about their experience with online verification of the alternative English language tests.

Analysis of the visa processing staff survey is presented in section 5.3 of this report.

Survey of Student visa applicants

A brief survey questionnaire was also developed with the SurveyMonkey® facility to obtain feedback from Student visa applicants who completed one of the alternative English tests. Survey links were emailed to Student visa applicants who provided email addresses either to the Department or their education provider in Australia. Due to the poor response of the emailed survey, a further student survey was conducted in May 2013 using the Department's Migration blog facility.

Analysis of the student survey responses is available in section 5.5 of this report.

4. Overview of English tests and providers

Educational Testing Service (ETS) delivers the TOEFL tests including the internet-based test (iBT). TOEFL tests are accepted for immigration purposes by the United Kingdom's (UK) Border Agency and the United States of America's (USA) US Citizenship and Immigration Services. The majority of tests delivered by ETS are internet based with less than 1 per cent of TOEFL tests being paper based. This is consistent with the tests submitted with Student visa applications during the review period where only 0.9 per cent (3) of the 312 tests were paper based.

The Pearson Australia Group delivers the Pearson Test of English Academic (PTE), which is accepted by the UK Border Agency for immigration purposes. Pearson introduced their internet based tests in 2009 and all components are delivered in electronic format. The test marking is automated with human intervention only required for tests where confidence in automated marking level is not achieved or if anomalies are detected.

Cambridge English Language Assessment delivers the Cambridge's CAE test which is accepted for immigration purposes by UK and Canada's Citizenship and Immigration Canada, while New Zealand's Immigration New Zealand accepts Cambridge's Certificate of Proficiency in English (but not CAE). CAE is available in two testing formats: paper-based testing and computer-based testing. Both paper and computer-based testing use live speaking examiners. The results of both paper and computer-based testing are scanned and stored electronically for a minimum of two years.

5. Assessment findings

In assessing the providers' written responses against the review criteria drawn from the service delivery deed of agreement, all providers met the Department's requirements and standards in relation to the four main areas which are:

- integrity in delivering tests;
- the content of the tests;
- the standards of administration in conducting the tests; and
- results validity and information provided to students

The additional review requirement of providers demonstrating compliance during the first 12 months of operation with the online verification aspects of the deed of agreement was also met by all providers.

Alternative English language test providers' review submissions were comprehensive addressing all the TOR assessment criteria. The submissions contained extensive detail about the test content, security measures in conducting tests and issuing score results and the research that each provider has commissioned in relation to their test validity and recognition internationally.

The student survey responses confirmed that the alternative English language tests were selected based on their reputation followed by test centre location and the cost of the test. Just over 85 per cent of respondents indicated that they would choose the same alternative English language test in the future if required.

While the requirements were substantially met by the providers, there were two areas requiring further attention. The first relates to integrity in delivering tests, namely reporting of cancelled test score results to the National Allegation Assessment Team (NAAT) located in South Australia. Of the three providers, ETS misunderstood the requirements to report all cancelled test score results to NAAT as well as to the referring area in the Department. This misunderstanding has been resolved and ETS are now aware of the reporting requirements as set out in the NAAT produced manual *English Language Test Centre Referral Procedure Manual Impostor/ID Fraud*. ETS are now reporting security incidents at test centres and cancellations of test score results to NAAT.

The second area requiring further attention was the ease of use of online verification systems and in particular the additional steps required for PTE verification where a person who has completed the test must assign their result to the department enabling visa processing staff to then verify the test score online. This process was identified by visa processing staff as being cumbersome resulting in delays in contacting the visa applicant to obtain the information and in some cases liaising with Pearson staff to resolve any verification issues. Pearson advised that they are developing a more user friendly online verification system for government officials which will be available in 2014, however, they are able to consider earlier introduction if required by the Department. This will need to be pursued with Pearson in renewal of service delivery deed of agreement negotiations.

Related to the ease of use of online verification systems, Pearson alerted the review team that they were aware that not all of their test scores are verified online. ETS also advised the review team that following their discussions with the UK Border Agency, it was stated that there were some concerns about the level of online verification by visa assessment staff of TOEFL test scores for visa applicants. The review team has confirmed based on individual data received from Pearson that student visa processing staff may not be verifying all PTE test scores online. This matter may be addressed with additional training by English language test providers for visa processing staff globally. In the longer-term, quality assurance may be achieved with the possible inclusion of test score verification in the quality assurance audit process for visa categories where an English language requirement exists and an English language test score was submitted with the visa application.

Further training on online verification processes by English language test providers can also be reinforced by a 'ready reckoner' information leaflet for visa processing staff containing instructions on how to verify online English language test scores issued by the various English language test providers.

5.1 Responses from providers

Providers' written responses were comprehensive and consistent with their initial submissions when assessed to deliver English language testing services. In assessing whether the providers met their service delivery agreement obligations as per the agreed criteria for the review, all providers met their obligations in accordance with the Department's requirements and standards.

1. *Integrity in delivering tests*

All providers demonstrated that they updated their test content regularly, employed trained markers and invigilators and implemented standardised testing conditions in all test centres. Their storage of test material and availability for audit purposes by the Department complied with the requirements for the Student visa programme. Security measures for internet based testing, minimising risk of identity substitution and document fraud were also of a high standard.

Pearson and Cambridge reported fraud incidents to the NAAT in South Australia and in accordance with the procedures outlined in the NAAT produced guidelines in the *English Language Test Centres Referral Procedure Manual Impostor/ID Fraud*. NAAT distributed these guidelines to all test providers in October 2011 and they met with all alternative English language test providers during 2012 to discuss and expand on the purpose of the manual. It appears that ETS misunderstood these requirements and reported fraud incidents to the Department's Regional Directors at relevant offshore posts only and did not include NAAT in the email advices. This misunderstanding was addressed during the interview although ETS commenced reporting fraud incidents to NAAT in February 2013.

2. Content of tests

All three tests measured English language skills in reading, writing, speaking and listening. Similarly, all three providers presented evidence of extensive research they have conducted which supported the validity and reliability of their respective English language tests.

In their submission, ETS advised that in 2012 they spent more than \$2 million (US) on research to support and continue to enhance the TOEFL test. A listing of recent research can be found at the following website: <http://www.ets.org/toefl/research/topics/validity>.

Pearson submitted a 14 page listing as Appendix 7 'PTE Academic Research Profile' which provides details on the range of research projects which support the validity and reliability of PTE Academic.

According to their submission, Cambridge conducts a continuous programme of research into the validity and reliability of CAE and details were provided of five funded research projects investigating aspects of CAE exam.

3. Standards of administration in conducting the tests

Based on information provided in the submissions, the cost of alternative English language tests in Australia varies with the TOEFL iBT cost being the lowest at \$230, followed by CAE at \$270 and PTE at \$330. In comparison, the IELTS test cost in Australia is \$330. Cambridge advised that they reduced their test fees in Australia from \$368 to \$270 to assist with competitive pricing in comparison to other tests accepted in Australia. Table 1 below compares the alternative English language test fees as at end of May 2013 in the top five Student visa source countries. Although test fees are not readily available from the Cambridge website, it appears that the CAE test fees, as advised in the submission in January 2013, are much lower in China, India and the Philippines in comparison to the fees set for PTE and TOEFL/iBT. Test fees for PTE are generally higher than the fees for TOEFL/iBT and CAE.

Table 1: Comparison of test fees (US \$)

Country	PTE	TOEFL/iBT	CAE
China	\$275	\$245	\$120*
India	\$165	\$165	\$66*
Nepal	\$170	\$160	\$78
Pakistan	\$150	\$160	\$153
Philippines	\$230	\$195	\$107*

*As per January 2013 submission information.

ETS (TOEFL) emphasised in their written response and during their interview that they are a not-for-profit organisation aiming to provide opportunities in developing countries for students who wish to further their studies in English speaking countries.

4. Results validity and information provided to students

All providers submitted information about extensive research they have conducted which supports their claims in benchmarking their tests for comparability and maintaining equivalencies. Ongoing monitoring of trends in candidates' performance and results was also featured in responses by all three providers. This was further substantiated by providers with evidence that the respective tests are used internationally by institutions/authorities.

Providers advised that test results were available for online verification for at least two years and descriptors of results were provided to candidates in the printed test result accompanying the test score advice. Test results are stored or archived for online verification up to two years from the issue date of the test result and in some cases online verification is available for longer than two years.

5. Deed of agreement compliance with online verification of results

The additional review requirement for providers to demonstrate compliance during the first 12 months of operation with the online verification aspects of the deed of agreement was also met by all providers. The administration and access by visa processing staff to the online verification systems was managed by the providers. Initial training including webinars was delivered by all providers to departmental staff in Australia and overseas.

In October 2011, introductory materials about TOEFL/iBT test and verification system training materials were developed and sent by ETS to all DIAC and DFAT offices. During October and November 2011, ETS offered training webinars which were delivered in Jordan, Sri Lanka, Hong Kong, the Philippines, Malaysia, India, Papua New Guinea, China and London.

Pearson advised that throughout 2012 training sessions were delivered to departmental representatives and Australian universities and colleges on using the Pearson Score Report Website to verify PTE scores.

In their submission, Cambridge advised that in the first 12 months of operation, they rolled out their global test day photo system and provided a training programme for all departmental officers who would be using the online verification system. During October and November 2011, 19 training sessions were held around the world, many as web based presentations.

Under this heading in their submission, ETS provided additional information about cancelled test scores which followed inquiries to their Office of Testing Integrity. These inquiries from departmental staff and Australian universities resulted in 9 and 74 test score cancellations respectively. Details of these test score cancellations were not reported by ETS to NAAT. ETS misunderstood their obligations to report test score cancellations to NAAT and this was resolved during the interview and a further letter from ETS seeking clarification of their reporting requirements.

Attachment B contains a summary of providers' written responses next to the service delivery criteria in the review TOR. Complete written responses from each provider are available at Attachment H.

5.2 Interviews with providers

The purpose of the interviews was to clarify responses and where appropriate seek, further information from the providers. The interviews were an opportunity for the providers to raise any issues about the implementation of testing arrangements, the review process and the timeframe for negotiating renewal of Deeds of Agreement (DoA) with the Department. The current DoA are due to expire in November 2013.

Prior to the interviews, the review team forwarded the interview agenda which also included additional questions and information requests arising from the submitted responses. Attachment C contains the list of questions and additional information sought from each test provider.

6 March 2013: Pearson (administrators of the Pearson Test of English Academic)

The first interview was scheduled on 6 March 2013 with Pearson representatives, Sasha Hampson and Fraser Cargill.

The review team's questions and clarification of certain responses in Pearson's written submission were fully resolved during the interview. Pearson alerted the review team to possible non-verification of test scores during visa assessment. This was due to a discrepancy between Pearson's number of tests assigned to the Department for verification and departmental data on the number of tests submitted with visa applications. This discrepancy was followed up with data matching against departmental records and it appears that possibly 103 of the 131 tests may not have been verified by visa processing staff (VPO).

Comments from VPOs who completed the review survey indicate that staff found the Pearson online verification process to be inefficient as the test candidate must provide the Department with their access code and password in order for departmental staff to view the candidate's score. This cumbersome verification process may partly explain the discrepancy in online verification data. Pearson advised that they are also aware that not all education providers in Australia may be verifying score results online after the test taker has assigned their result to that education provider. Pearson advised that they are in the process of developing a more user friendly verification system for government and education providers and are able to introduce those arrangements earlier, if required by the Department.

The take-up rate of PTE has been lower than expected and Pearson representatives assessed that in the English language testing market, IELTS holds an entrenched position in the Student visa programme which is also the case with the approved tests for the Skilled visa programmes.

7 March 2013: Educational Testing Service (administrators of the TOEFL iBT test)

ETS provided detailed responses to the review team questions emphasising the security features of central marking of tests where the speaking and written components are assessed by trained markers.

ETS emphasised that being a not-for-profit organisation, their goal is to continue to offer language training and testing in developing countries including Africa so that young people have an opportunity to pursue their studies in other countries.

Reporting of fraud incidents and details of cancelled score results was raised by the review team and ETS advised that they had met their obligations by advising departmental staff through their discussions with either the offshore Regional Directors or visa processing staff. ETS advised that they were not aware that they were also required to report fraud incidents and test score cancellations to NAAT. In addressing this misunderstanding, ETS suggested that regular six-monthly discussions could be organised with NAAT to share information about emerging trends in the English language testing industry including trends observed through the Council of International Students Australia (CISA) network.

An overview of the Department's fraud reporting procedures was presented to ETS as per the *English Language Test Centres Referral Procedures Manual Impostor/ID Fraud* which is produced by NAAT. ETS reported two fraud incidents to NAAT in February 2013.

The review team agreed to provide further advice to ETS and all other English test providers about their service delivery deed of agreement obligations to report test score cancellations.

ETS raised an important issue that they had discussed with the UK Border Agency which had indicated that possibly not all of the TOEFL test scores were verified online by visa processing staff. The review team agreed to investigate if this was also the case with TOEFL tests submitted to the Department with student visa applications.

Since the introduction of Streamlined Visa Processing arrangements for eligible students applying to study at a participating Australian university, ETS contact in relation to English language tests for Higher Education visas has been with participating Australian universities rather than the Department. ETS advised that it had been a slow process to promote TOEFL to parents, students and agents. ETS noted that as the post study work visa arrangements for the Temporary Graduate (Subclass 485) visa exclude TOEFL, students are therefore steered to the IELTS test as being a more acceptable pathway for both their student visa and their post study work visa.

18 March 2013: Cambridge (administrators of the Cambridge English: Advanced test)

The review team sought clarification of two issues relating to the Cambridge CAE test with Cambridge during the interview: the availability of test fees on Cambridge's website; and whether, with a total of four Cambridge tests submitted to the Department by Student visa applicants, Cambridge's expectations of take-up in Australia had been met. This data does not include CAE tests that were conducted as part of Streamlined Visa Processing arrangements implemented in March 2012.

Due to the business model adopted by Cambridge where registration of tests is decentralised and managed by test centres, the test fees are not available on Cambridge's website although the relevant fee would be available from the particular test centre or its website. Registration for Cambridge tests differs from IELTS in that Cambridge offers a 12 week preparatory course prior to the test. Student agents refer students to appropriate English language courses and test centres. The course and test are bundled by Navitas³ and other education organisations which Cambridge considers as being a model that has delivered very low repeat test rates.

³ Navitas is a leading global education provider that offers an extensive range of educational services for students and professionals including university programmes, English language training and settlement services, creative media education, workforce education and student recruitment.

In terms of take-up rate expectation, Cambridge stressed that the challenge has been to persuade Australian *universities to accept their test with 32 of 39 universities now recognising CAE*. The low take-up rate with only four Cambridge tests lodged with Student visa applications during the review period was expected as the provider's strategy for entry in the Australian market consists of firstly establishing recognition by universities and education providers and then marketing their product for university admission.

Reporting systems used by Cambridge do not currently allow for test data to be provided identifying test candidates by destination or intended country of use of their test.

In their review submission, Cambridge stated that "given that IELTS has had a monopoly in Australia in terms of the Department's recognition for several years and the test is well entrenched and associated with visa application for Australia, changing the mind set and perception in the market will take some time". During the interview Cambridge emphasised that IELTS is the surrogate standard for English language tests in Australia and Cambridge is currently at the cultural and awareness stage of their marketing strategy.

5.3 Survey of visa processing staff

Feedback from Student visa processing staff in Australia, London and New Delhi was sought to establish whether staff had processed visa applications where one of the additional English language tests was submitted and their experience with the different online verification systems.

A survey was conducted using the SurveyMonkey® facility which is widely used by the Department's internal audit area. The survey questionnaire included general questions about visa processing staff exposure to TOEFL, PTE or CAE tests and included a general comments field about any issues with online verification systems.

Of the 26 responses received, 20 staff indicated that they had some exposure to the three new English language tests with 70 per cent of staff assessing visa applications with submitted TOEFL iBT tests and 20 per cent with the PTE test. Of the surveyed staff, 10 per cent indicated that they did not remember the English language test submitted with the visa application and none had processed a Student visa application where the CAE test was submitted.

Almost 65 per cent of staff experienced some difficulties with the online verification systems by alternative English language test providers. Overwhelmingly, visa processing staff found the Pearson online verification processes for PTE difficult, because the student must assign the test result to the Department for verification and provide their password. Prospective Student visa applicants omitted to assign their test score and provide password details to visa processing staff which resulted in delays in verification of PTE results and resolution of online verification issues with Pearson. Some staff also commented that the online verification protocols for the new tests were not widely available and that the verification process was convoluted requiring too many variables in order to confirm a test score.

In summary, the online verification systems for alternative English test results are unfamiliar to visa processing staff with the PTE verification process being less efficient to use as students may not be aware that they need to assign their test results to the Department for verification.

Pearson's online verification processes were discussed during the interview and the review team was advised that Pearson were in the process of developing a more user friendly verification system for government and education providers to be available in the next 12 to 18 months, however, Pearson may be able to introduce those arrangements earlier if required by the Department.

Full survey results of visa processing staff experience with the new English language tests are presented in Attachment D.

5.4 Survey of Student visa applicants

The survey was designed to seek feedback from students who had completed one of the alternative English language tests about their experience with the testing arrangements, cost and location of the test and willingness to choose the same test in the future if required.

The survey contained nine questions and was conducted via the SurveyMonkey® facility. Student contact details were obtained from the Department's visa application systems and the survey link was emailed to students. During March 2013, of the 28 students contacted either by email or telephone, only 14 responded to the survey. Due to the low response rate, a further survey was then conducted in May 2013 through the Department's Migration blog facility where the survey advice was also placed on twitter and Facebook. There were 767 survey respondents in the second survey although the majority of respondents (92 per cent) had completed an IELTS test.

Combining the results from the initial email survey and the follow up Migration blog survey, 781 students completed the questionnaire with 46 completing an alternative test - 27 TOEFL iBT, 10 PTE and 9 CAE.

	IELTS	CAE	PTE	TOEFL iBT	Do not remember	(blank)	Total
Email survey	0	1	7	4	0	2	14
Migration blog survey	718	8	3	23	11	4	767
Total	718	9	10	27	11	6	781

The majority (72 per cent) of alternative English tested students completed their test overseas and the main reason for choosing one of the new tests was the reputation (36 per cent) of the test followed by the location (28 per cent) and cost (23 per cent) of the test. Just over 85 per cent of students indicated that they would choose the same alternative English language test again if required.

Although IELTS tests are not within the scope of the current review of alternative English language test arrangements, the survey responses are a useful comparison. Consistent with the alternative test responses, IELTS was selected predominantly based on its reputation (39 per cent) followed by location (23 per cent) of test and the cost (4 per cent) of the test. An unusual observation with the IELTS survey responses was that 35 per cent of respondents did not select a reason for choosing the test and instead provided feedback that they did not have a choice about the test due to visa requirements, location and availability of test and recommendation by their agent.

In comparison to the alternative tested student responses, a lower proportion at 72 per cent of IELTS tested respondents would choose the same test again. Of those 24 per cent who would not choose the test again, the main reason was the perceived unfairness in marking, the complexity of tests and the high cost. It is important to note that the number of survey respondents who indicated that they completed an IELTS test represents less than 5 per cent (718) of the total number (15,693) of Student visa applicants who completed an IELTS test during the 12 months from December 2011 to November 2012. The survey results are therefore not representative of the IELTS tested Student visa applicants. Furthermore, responses also included other visa applicants as it was not possible to limit the survey to only Student visa applicants.

5.5 Quantitative analysis of English language test data

English language test data analysis focuses on the number of English language tests that were submitted with Student visa applications. Basic analysis of alternative English language tests submitted by type of visa subclass, citizenship of students and location of where tests were conducted is also presented. The monthly take-up rate of alternative English language tests since introduction is also considered. Visa decision outcomes of Student visa applications with alternative English language tests is explored, however, the Department currently does not report on Student visa application refusals due to an applicant's failure to satisfy English language requirements.

The analysis does not include individual or providers' English language test scores or different test components. Incidence of repeat testing by each provider was not considered to be within scope of the review.

Student visa subclasses

Analysis of English language tests completed by Student visa applicants is based on data that identifies when the test was conducted as recorded in the Department's visa processing systems (ICSE and IRIS). During the review period, of the 447 students who completed one of the alternative English language tests, 74 per cent had lodged a Student visa (Subclass 573) application for Higher Education studies followed by 17 per cent who applied for (Subclass 572) seeking to study in the Vocational Education and Training sector. Just over 50 per cent of students who applied for Higher Education (Subclass 573) had completed the TOEFL test. In comparison to Student visa applicants who completed an IELTS test during the same period, a slightly lower proportion or 65 per cent applied for a Higher Education Sector (Subclass 573) visa while 31 per cent applied for a Vocational Education and Training sector (Subclass 572) visa. Table 2 below shows the type of Student visa applications submitted and the English language test completed by those visa applicants who were required to provide evidence of their English language ability.

Table 2: Student visa subclass of applicants who completed an English language test by visa subclass (Dec 2011 to Nov 2012)

Student visa subclass	IELTS	OET	TOEFL	PTE	CAE	Total
570 - Independent ELICOS Sector	52					52
571 - Schools Sector	47		1			48
572 - Vocational Education and Training Sector	4911	3	52	24	3	4993
573 - Higher Education Sector	10337		226	105	1	10669
574 - Postgraduate Research Sector	122		8			130
575 - Non-Award Sector	206		24	2		232
576 - AusAID and Defence Sector	18		1			19
Total	15693	3	312	131	4	16143

Source: DIBP (R0879)

Citizenship of students

Students from India represented 34 per cent of total students who completed an English language test, however, students from India who completed one of the alternative tests represented 56 per cent of all alternative English language tests. Of those students who selected a TOEFL test, 49 per cent were Indian citizens while 73 per cent of PTE tested students were Indian citizens. The distribution of TOEFL test selection is broader across citizenship in comparison to PTE and CAE tests.

The citizenship of students who completed an alternative English language test aligns with the top 10 citizenship countries required to provide evidence of English language competency based on Assessment Level⁴ and type of Student visa subclass.

Table 3: Top 10 Citizenship of Student visa applicants who completed an English language test (Dec 2011 to Nov 2012)

Citizenship of Applicant	IELTS	OET	CAE	PTE	TOEFL	Total
INDIA	5285		1	96	155	5537
CHINA	2934		0	6	57	2997
NEPAL	2000		0	3	18	2021
PAKISTAN	1691		0	12	11	1714
PHILIPPINES	1074	1	0	0	1	1076
SRI LANKA	711		0	1	4	716
COLOMBIA	311	1	2	4	8	326
BANGLADESH	276		0	2	0	278
VIETNAM	226	1	0	0	2	229
MYANMAR	135		0	0	2	137
Others	1050	0	1	7	54	1112
Total	15693	3	4	131	312	16143
% of total tests	97.21%	0.02%	0.02%	0.81%	1.93%	100%
% of alternative tests			0.9%	29.3%	69.8%	447

Source: DIBP (R0879)

⁴ Student visa Assessment Levels (ALs) form the basis of the risk management approach to the Student visa program, and are based on the immigration compliance performance of students from a particular country for each education sector. There are five ALs: AL1 represents the lowest immigration risk, and AL5 the highest. As the AL increases, an applicant must provide a higher level of evidence of English language proficiency, financial capacity and previous study to the department in support of their application.

Location of tests

Of the total English language tests completed, 27 per cent were conducted in India, 20 per cent in Australia, 14 per cent in China and 10 per cent in Nepal and Pakistan. The top 10 locations for English language tests are presented in the table below. Of the alternative English language tests, 10 per cent of PTE tests were conducted in Australia and they represent 65 per cent of the total 20 tests in Australia for the three alternative tests.

Both TOEFL and PTE tests are broadly aligned with the IELTS test locations, however, TOEFL appears to have a stronger market in China in comparison to PTE.

**Table 4: Top 10 tests locations for English language tests conducted
(Dec 2011 to Nov 2012)**

Location of test taken	IELTS	OET	CAE	PTE	TOEFL	Total
AUSTRALIA	3136	3	3	13	4	3159
INDIA	4145		1	95	148	4389
CHINA	2244			2	51	2297
NEPAL	1620			1	16	1637
PAKISTAN	1520			11	7	1538
PHILIPPINES	943			0	1	944
SRI LANKA	648			1	3	652
BANGLADESH	176			1		177
MYANMAR	126				2	128
VIETNAM	122					122
KENYA	103			2	11	116
Others	910			5	69	984
Total	15693	3	4	131	312	16143

Source: DIBP (R0879)

Take-up of alternative English language tests

The take-up rate of the alternative English language tests has increased gradually since testing commenced in mid-November 2011. Table 5 below presents the number of tests conducted by test month where the test was subsequently submitted with a Student visa application. The date of the Student visa lodgement is not shown in the table.

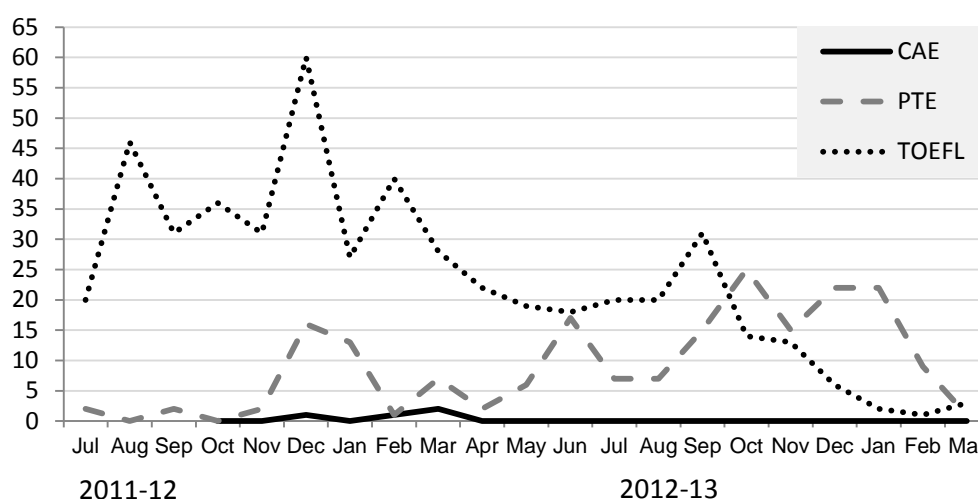
**Table 5: Month of English language test completion
(July 2011 to March 2013)**

Month	IELTS	OET	CAE	PTE	TOEFL	Total
Jul 11	1860			2	20	1882
Aug 11	2101	1			46	2148
Sep 11	2685			2	31	2718
Oct 11	2751				36	2787
Nov 11	2524	1		2	31	2558
Dec 11	1804		1	16	60	1881
Jan 12	1649			13	27	1689
Feb 12	1715		1	1	40	1757
Mar 12	1598		2	7	28	1635
Apr 12	1445			2	22	1469
May 12	1075	1		6	19	1101
Jun 12	1069			17	18	1104
2011-12	22276	3	4	68	378	22729
Jul 12	961			7	20	988
Aug 12	988	1		7	20	1016
Sep 12	1239			15	31	1285
Oct 12	1206	1		25	14	1246
Nov 12	944			15	13	972
Dec 12	529			22	6	557
Jan 13	387			22	2	411
Feb 13	263			9	1	273
Mar 13	114		0	1	3	118
YTD 2012-13	6631	2	0	123	110	6866

Source: DIBP (R0879)

While TOEFL tests were able to be selected in countries where IELTS was not available, Graph 1 shows that there was discernible increase in number of tests conducted in December 2011 which seems to have plateaued at about 30 tests each month. PTE tests seem to be increasing since September 2012 and have been higher than TOEFL tests since October 2012.

Graph 1: Alternative English language tests submitted with Student visa applications by month (Jul 2012 to Mar 2013)



The above analysis must be qualified because the data represents the month when the test was conducted for an English language test which was subsequently submitted with a Student visa application. Therefore the monthly data is subject to revision as there is a lag between the date of the test and when a visa application is lodged. In some cases this lag may be more than 12 months. The test score result is valid for 2 years and visa applications must contain a valid English language test score.

Visa decision outcome

Of the 447 Student visa applicants who completed an alternative English language test during the 12 month review period, 94 per cent were granted their Student visa as at end of March 2013. The grant rate for visa applications processed in IRIS was 96 per cent while the grant rate for visa applications processed in ICSE was 85 per cent. Closer examination of the refusal data showed that one PTE test score for an Assessment Level 4, Subclass 572 Student visa applicant was below the minimum score of 36. Similarly, two Assessment Level 4, Subclass 573 Student visa applicants who completed the TOEFL iBT test were awarded scores that were below the minimum score requirement. It is important to highlight that the English language test score requirement is variable depending on duration of ELICOS study and enrolment in a foundation course study.

Online verification of test score results

During the interview with Pearson representatives on 6 March 2013, it was discovered that the number of Student visa applicants who completed a PTE test differed from the data held by Pearson on the number of test candidates that had assigned their test results to departmental visa processing staff for online verification. While departmental data identified 131 Student visa applicants who completed a PTE test which was submitted with their visa application, Pearson indicated that the number of test candidates who assigned their test to the Department was much lower. This raised concerns about possible non-verification of PTE score results.

Pearson provided individual data of those test candidates who completed their test between November 2011 and November 2012 who then assigned their results to the Department for verification. Of the 34 test candidates, 28 matched Student visa applicant details while 6 test candidates' details were not able to be found in departmental systems. This leaves 103 PTE tested Student visa applicants who may not have assigned their test score to departmental staff for online verification. It is not possible to produce system reports that indicate whether an online verification of an English language test score had been performed by a visa processing officer. It may be possible to conduct a manual audit of each visa applicant's documentation file and checklist to confirm whether online verification had occurred.

ETS also provided details of TOEFL/iBT test candidates since October 2012 who indicated that Australia was their intended destination. The audit trail details show that 1,201 test candidates' scores were verified online although this data relates to only 980 individuals as 822 scores were verified once, 117 were verified two times while the remaining 41 were verified three or more times. As at end March 2013, departmental systems show that since October 2012 there were 94 Student visa applicants who completed a TOEFL/iBT test. Data provided by ETS would therefore include all test candidates who indicated Australia as their intended destination where the test score would be used irrespective of the purpose of the score.

Given that ETS representatives advised that they were aware from their discussions with the UK Border Agency that there may be some concern about possible non-verification of test scores, pursuing discussions with the UK Border Agency counterparts may be warranted to establish the extent of these concerns.

5.6 Feedback from relevant stakeholders in the Department

National Allegation and Assessment Team South Australia (NAAT SA)

The service delivery agreements with all English language test providers specify certain obligations in reporting any security incidents as well as co-operating with security reviews as notified by the Department. These obligations are specified under section 8.2 of the agreement. In April 2012, NAAT issued guidelines to all English language test providers on reporting of security incidents in a document titled *English Language Test Centres Referral Procedure Manual Impostor/ID Fraud*. NAAT also provided training on document security features and detecting document fraud to all new providers.

NAAT liaises regularly with all English language test providers on reporting of identified fraud and security incidents at test centres globally. Additional instructions were also issued in late 2012 to all providers outlining details to be provided with test score cancellation reports. More recently NAAT has consulted with all providers to establish consistent reporting processes with test score cancellations to include the reason for the cancellation.

NAAT has been actively involved with the implementation of alternative English language testing arrangements and were consulted during the development of the review TOR. Feedback was sought from NAAT on written submissions from the alternative providers including additional comments on security incidents, fraud and test score cancellation reporting procedures.

Feedback from NAAT confirmed that they had received the fraud reports as stated by Pearson and Cambridge. The detail in those reports was sufficient for their investigation purposes. NAAT advised that as at 6 February 2013 they had not received any TOEFL test score cancellation reports from ETS. Similarly, fraud and security incidents that were specified in the review submission were not provided to NAAT. While it was accepted that these reports were provided to departmental staff at various processing offices who would have placed relevant system alerts, there was an expectation that the reports would have been provided by ETS to NAAT as per the reporting guidelines manual.

While the expectation by NAAT was that English language test providers would report all test score cancellations, the providers' obligations were not clear in the service delivery agreement. Further guidelines about reporting test score cancellations did not specifically include advice about reporting to NAAT any test score cancellations that were referred by education providers where the test candidate was not issued with a Confirmation of Enrolment (COE). Advice was sought on this matter and it was recommended that providers' reporting obligations be clarified in future service delivery agreements.

NAAT is in the process of revising the *English Language Test Centres Referral Procedure Manual Impostor/ID Fraud* to ensure that all English language test providers are aware of their reporting obligations.

Given the relatively low volume of alternative English language tests taken by Student visa applicants, there were no integrity concerns by NAAT of alternative English language test providers' delivery of English test services in the Student visa programme.

Student Policy Section, Student Policy Projects Section and Student Implementation Taskforce

Student policy sections advised that alternative English language tests have assisted in alleviating delays previously experienced by Student visa applicants who sought to arrange test appointments for an IELTS test. In terms of meeting the Student visa programme objectives, alternative English language tests offer more choice for students who wish to pursue their studies in Australia. At this stage there have been no significant integrity concerns that have arisen regarding the integrity of alternative English language test service delivery.

6. Effectiveness of meeting Student visa programme objectives

During the review period, all three alternative tests were submitted with Student visa applications assessed by the Department. While the proportion of additional tests was relatively low at 3 per cent (447) of all tests (16,143) submitted during the review period, the number of alternative tests actually taken by students intending to study in Australia may be higher. With the commencement of Streamlined Visa Processing (SVP) arrangements for certain students (whereby evidence of English language proficiency is provided to the educational institution rather than the Department) and the marketing campaigns by providers for recognition of their tests by Australian education providers it is probable that prospective students are submitting alternative English language tests to participating universities as part of the enrolment/admission process. The review does not have visibility of usage of alternative English language tests within SVP arrangements.

The providers' integrity measures were of a high standard in terms of test centre security, test content, training and qualification of markers and invigilators. These standards were consistent with the providers' initial submissions to deliver English language tests for the Student visa programme.

Use of internet based testing and electronic storage of test results and test material, in particular, scanning of the written component of the test seems to be further advanced by all alternative providers when compared to IELTS practices where electronic storage of the written component of their test is expected to be introduced in 2015.

All providers complied with their service delivery agreement obligations; however, ETS did not report fraud incidents and test score cancellations to NAAT. This misunderstanding has been addressed and ETS are aware of their obligations having commenced reporting to NAAT from 20 February 2013. Advice was sought clarifying test provider's obligations to report test score cancellations referred by education providers prior to enrolment and lodgement of visa application.

It is not possible to ascertain the reason for non-verification of test score results by visa processing staff although it is highly likely that the different verification processes for various alternative English language tests may be unfamiliar for Student visa processing staff especially given the low take-up in the first 12 months. The complexity of five different providers' online verification systems and assessment of five different English test score equivalencies may be perceived as inefficient and disruptive to overall Student visa assessment practices.

Given that ETS have alerted the Department that non-verification of test results may also be an emerging issue that they have observed with UK Border Agency visa assessment processes, further analysis of integrity in verification of English language test results across visa programmes and consultation may be appropriate with immigration counterparts in the UK and remaining countries in the Five Country Conference (FCC) forum. Greater collaboration within the FCC forum on integrity and delivery of English language testing services is likely to yield mutual benefits in visa programme integrity and possibly future directions in assessing English language requirements for visa purposes.

Overseas students intending to study in Australia have more choice in the type of English language test and frequency in test appointments following the introduction of alternative English language proficiency tests. Proliferation of internet based English language testing and test centres by IELTS, OET and all three alternative providers, reduces the possibility of delays in securing test appointments.

In terms of increasing competition in the English language test industry, test fees for TOEFL (\$230) and CAE (\$270) are lower than for IELTS (\$330) especially with the fee for CAE being reduced in Australia from \$368 to \$270. The fee for PTE in Australia is set at the same level as IELTS. Whether this trend in competition and lower test fees continues remains to be seen as the new English language test providers pursue their marketing campaigns to increase their market share in Australia.

Overall, the alternative English language test provider arrangements have been effective in meeting the Student visa programme objectives relating to visa programme integrity and flexibility in assessing English language requirements.

7. Suitability for other visa programmes

One of the main reasons for the introduction of additional English language tests in the Student visa programme was to alleviate the delays candidates reported in obtaining appointments with English language test providers. In the first 12 months of operation, the number of alternative English language tests chosen by prospective students represented 3 per cent of the overall English language tests with the majority or 97 per cent of students preferring to sit for an IELTS test and the result submitted with their Student visa application.

It could be argued that the alternative English language test providers require more time to become established in the Australian Student visa programme which may result in increased share of the English test market. At the same time, the low take up rate was expected by the alternative English language test providers following introduction of Streamlined Visa Processing arrangements in March 2012, which resulted in increased effort and resources in promoting the recognition of alternative English language tests by participating Australian universities.

The alternative English language test providers considered that there are structural barriers within the visa programme requirements which currently do not allow alternative English language tests to be accepted in the Skilled visa programmes. This was referred to as creating pathways for Student visa applicants to prefer to sit for an IELTS test, because the IELTS test score is also accepted in the Temporary Graduate (Subclass 485) visa and the Skilled visa categories, whereas the alternative tests are not accepted for these visa subclasses. The current industry standard for English language test score validity is two years based on language acquisition and attrition rates. More detailed analysis of English language test result usage across the Student and other visa streams will establish whether the same IELTS and OET scores are used in the Temporary Graduate (Subclass 485) visa and the Skilled visa programmes.

Skilled visa applicants do not currently appear to be affected by the same delays in accessing English language test appointments that impacted on Student visa applicants prior to implementation of the alternative English language tests for the Student visa programme. Expanding the alternative tests to the Skilled visa programme solely on the grounds that it would reduce delays in accessing test appointments is therefore not warranted. There is some anecdotal evidence that regional areas in Albury/Wodonga may not have sufficient access to English language courses and testing facilities. Further research of regional Australia's access to English language training and testing appointments for Skilled visa programme applicants will assist deliberations and rationale for approval of more English test providers if existing services are inadequate.

Minimum English language test scores prescribed in migration legislation for all specified English language tests for Student visa purposes have been set at levels that reflect their use as a tool to manage immigration risk in the Student visa programme and enable students to successfully undertake their course of study and fully participate in the Australian community. The minimum English test scores prescribed for the Skilled visa programme reflect a focus on general English language skills for the workforce. While academic modules of English language tests can be submitted with Skilled visa applications, the current requirements and equivalencies in other visa programmes will need to be maintained. Prior to approval of multiple English language tests in other visa programmes, detailed analysis will be necessary to ensure that test content is appropriate and that equivalencies are established in accordance with a more generic common standard of English language competency. The UK Border Agency has adopted the Common European Framework of Reference for Language (CEFR) while Citizenship and Immigration Canada has developed the Canadian Level Benchmark for their English language proficiency requirements.

The current review of alternative English language tests did not seek information from providers about their non-academic English language tests.

Another area that may be considered is consistency across visa programmes in English language requirements. In some visa categories the English language test is accepted if conducted within two years of visa lodgement while in other visa categories the test is acceptable if conducted within three years of visa lodgement. Exemptions in English language requirements for previous study in English speaking countries are also inconsistent, as only the Student visa programme specifies South Africa as one of the English speaking countries for the purposes of meeting the minimum prior studies in English requirement. The list of those English speaking countries differs between visa programmes. For example, 5 years of study in Australia is acceptable for Student visa applicants, however, study in Australia is not considered as acceptable evidence of English language ability for the Temporary Graduate (Subclass 485) visa.

Depending on the impetus for additional testing options in other visa categories, extending the current three alternative tests to other visa programmes would need to be managed carefully. Expectations of alternative English test providers will also require careful management irrespective of whether extension to other visa programmes is considered. All three alternative providers assess that their tests would be more readily selected by visa applicants across visa programmes if their tests were approved in other visa programmes. Further analysis of English language testing arrangements in other visa programmes will inform consideration of whether increased choice in tests supports programme integrity, timeliness of visa processing and visa applicants' preference.

As per the table below, the current test score equivalencies for all English language tests in the Student visa programme is complex due to the different assessment ratings in place.

Test	Test Score Band										
IELTS	4.0	4.5	5.0	5.5	6.0	6.5	7.0	7.5	8.0	8.5	9.0
TOEFL iBT	31	32	35	46	60	79	94	102	110	115	118
PTE Academic	29	30	36	42	50	58	65	73	79	83	86
Cambridge English: Advanced (CAE)	32	36	41	47	52	58	67	74	80	87	93
OET	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass	Pass
TOEFL PBT	433	450	500	527	550	n/a	n/a	n/a	n/a	n/a	n/a

Source: DIBP <http://www.immi.gov.au/students/english-requirements.htm>

In comparison to IELTS, the take up rate for alternative English language tests has been low which has also meant that processing staff both offshore and onshore were not widely exposed to the alternative test score bands during the first 12 months of operation. Increasing complexity in English language test score bands could be viewed as contrary to the broader agenda in Visa Simplification and Deregulation⁵. More English language tests with individual test scores pegged to IELTS score equivalencies is not necessarily aligned with streamlining visa requirements for visa applicants and the assessment by VPOs.

⁵ Visa Simplification and Deregulation is a key reform to rationalise Australia's visa framework to make it simpler and more efficient.

With the exception of the OET test, all the remaining English language tests that are currently approved for the Student visa programme are also recognised by the UK Border Agency for a number of visa categories including students, skilled workers and the partner visa within the family stream. There are 28 English language tests that are approved by the UK Border Agency and these are specified in the list of approved English language tests and providers which is available from their website⁶. The individual English language test scores are also converted to equivalencies under the Common European Framework of Reference for Language (CEFR). The UK Border Agency's policy in terms of approved English language tests highlights the use of multiple tests and providers for visa assessment purposes.

8. Conclusion

The introduction of alternative English language tests has delivered more choice to Student visa applicants who are required to provide evidence of English language proficiency with their visa application. With only 18 months of operation, the take-up rate of alternative English language tests has been relatively modest with alternative English language tested Student visa applicants representing 3 per cent of all Student visa applicants who submitted an English language test during the first 12 months of operation. There are signs that the take-up rate may be increasing which is likely to be assisted with further promotion by alternative English language test providers and recognition of their tests by prospective students, student recruitment agents and Australian universities.

Alternative English language tests were undertaken in accordance with the Department's standards complying with the high integrity requirements and content of tests. The alternative English language test fees were generally lower than fees for other existing English language tests. Similarly, online verification access was delivered successfully although ease of system use and verification processes by Pearson may need to be improved. This is currently being addressed by the provider.

The expansion of alternative English language tests for other visa programmes will require further analysis to establish whether the academic focus of these tests is appropriate. With the current English language requirements for Skilled visa categories focus on general English competency for work purposes, it would be inappropriate to raise the English language requirements to the academic level.

It may be appropriate to consider developing a consistent framework for exemptions in English language requirements for certain passport holders and for those visa applicants with previous study in Australia. Comparing the current provisions, Student visa applicants who studied in English for 5 years in South Africa are exempt from English testing whereas South African passport holders are not exempt from English language testing if they apply for a Temporary Graduate visa (Subclass 485), Temporary Skilled (Business) visa (Subclass 457) and the suite of SkillSelect visa subclasses.

Another example of different approaches relates to the timeframe when an English language test was conducted in order to be accepted by the Department. Student visa applicants and Temporary Skilled (Business) visa (Subclass 457) applicants must have completed their test within 2 years of lodging an application while a longer time frame of within 3 years is acceptable for Temporary Graduate (Subclass 485) visa and SkillSelect visa applicants. The test result validity as issued by the English language test provider remains as 2 years because this is understood to be the industry standard based on language acquisition and attrition rates.

⁶ <http://www.ukba.homeoffice.gov.uk/sitecontent/applicationforms/new-approved-english-tests.pdf>

It is important to note the two year validity of test results as issued by English language test providers is often confused with the longer timeframe of three years within which the visa applicant must have conducted their English language test for the Temporary Graduate (Subclass 485) visa and SkillSelect visas. For the SkillSelect visas and the Temporary Graduate (Subclass 485) visa, the timeframes within which English language tests must be conducted are specified in the definition of English language levels of vocational, competent, proficient, and superior (Regulations 1.15B, 1.15C, 1.15D and 1.15EA).

English language pathways were emphasised by the alternative English language test providers as being a factor in the low take-up rate because in their view prospective students are looking beyond the first visa to their future options to gain work experience and apply for other visas where one English language provider is the current market leader. Alternative English test providers argue that this lead role continues due the current regulatory framework.

An unexpected outcome from the review was the incidence of non-verification of English language test results by visa processing staff. The extent of this practice is difficult to measure given the system limitations by English language test providers other than Pearson in being able to confirm if a test result was verified. Similarly, there are system and data issues within the Department as the online verification step is not currently recorded although it may be part of visa processing checklists developed locally at post or onshore processing centres. In order to mitigate possible visa programme integrity risks, further analysis may be appropriate accompanied by more prominent and clear quality assurance process for Student visa categories.

Although English language assessment under Streamlined Visa Processing arrangements is not within the scope of the current review, a potential risk was identified in robustness of reporting of fraud and test score cancellations where the test result was submitted to a participating Education provider for assessment as part of the enrolment/admission process.

Test score cancellations for 74 people who completed a TOEFL English language test were not reported to the Department because ETS misunderstood their reporting obligations. Advice in regards to English language test provider obligations within the service delivery deed of agreement with the Department recommended that the cancellation of test score reporting obligations needs to be referenced in the deed of agreement. The test score reporting obligations are part of NAAT's manual on fraud/impostor reporting for English language test providers.

In terms of longer term English language testing policy, it may be possible to explore possible collaboration with representatives from Five Country Conference (FCC) forum to identify opportunities to share English language policy information and perhaps standardise auditing of English language test provider obligations in delivering English language tests for respective visa and immigration purposes. As the same English language tests are also approved by FCC immigration agencies, there may be some scope to refine and share the auditing roles of test centres in countries where mutual interest is identified.

Attachment A: Terms of Reference

Review of the Implementation of Alternative English Language Proficiency Tests

Clause 5A102 of Schedule 5 to the *Migration Regulations 1994* (Cth) gives the Minister for Immigration and Citizenship (the Minister) the power to specify in a Gazette Notice an English language proficiency test as an alternative to the International English Language Testing System test (the IELTS test).

Purpose of the review

The Department of Immigration and Citizenship (the Department) has previously informed all specified alternative English language proficiency test providers (test providers) that their tests will be reviewed in order to:

- establish the effectiveness of the newly implemented tests in meeting the objectives of the Overseas Student visa programme; and
- form a basis for considering whether to introduce the alternative English language tests to other visa programmes.

The Department has also notified test providers that if a specified test is regarded as not meeting the Department's objectives, the Minister may consider revoking the specification of the test.

While the Minister may be guided by the results of the review, test providers are reminded that the Minister may revoke the specification of a test at any time having regard to any matters he considers relevant.

Period under review

The review will cover the operation of alternative English language proficiency tests from December 2011 until December 2012. To ensure consistency, all responses should relate only to this period.

Test providers will need to respond to the review by close of business on **Friday, 18th January, 2013**. All responses should be sent to:

**The Assistant Secretary
Visa Framework and Family Policy Branch
Department of Immigration and Citizenship
PO Box 25
Belconnen ACT 2616
Australia**

Evaluation of information

In evaluating the alternative English language proficiency tests, the Department will take into consideration the following information:

- written statements and evidence submitted by alternative English language test providers;
- information from interviews conducted with alternative English language test providers;
- feedback from relevant departmental internal stakeholders;

- quantitative data obtained from departmental systems, including analysis of data undertaken by visa programme owners; and
- feedback from student visa holders who have undertaken the new English tests.

Results of the review

The Department will endeavour to provide each test provider with an individual evaluation report during May 2013.

Assessment criteria

The review is primarily based on the benchmarks that were developed to inform the initial application process. In addition, test providers will need to give evidence of complying with the Deeds of Agreement for online verification services.

Responses of test providers

Test providers are required to provide a written statement against each of the benchmarks contained in the Assessment Criteria, citing the available supporting evidence from the first 12 months of operation of the test. The Department does not require the supporting evidence itself to accompany the written statement; however, it should be made available to the Department on request at any time. Providers' responses to the Assessment Criteria will form the basis of an interview that will follow to verify and confirm responses.

Responses from providers should be formulated in a table such as the example provided below:

Response of (*Provider's name*)

Requirement	Evidence to demonstrate compliance
1a. Regular updating of content to minimise the potential for prior knowledge of test material;	i. Written assurance available showing that company policy of reviewing tests every four weeks has been implemented. ii. Record of meetings to discuss test content and recorded action items directing changes to content. iii. Examples of different versions of test content.
1b. Measures in place have minimised the risk of identity substitution;	i. Two reports of identity substitution recorded. ii. New measure introduced: at time of application candidates present their passport or national identity card with a number, photograph, date of birth and signature and on test day they have presented the same ID document
1c. Document fraud measures have been in place, including: test reports incorporate security features to prevent tampering and forgery;	i. Records show 3 instances of document fraud reported on 3/4/2012, 6/5/2012 and 26/8/2012. ii. Tests reports include security features including xxx and xxx. Monitoring process in place to ensure reports have all security features intact.

Assessment Criteria

Test providers are required to demonstrate that they have met each assessment criterion specified below. Evidence must be drawn from the first 12 months of operation of the tests and be provided to the Department in table format as illustrated on the previous page. The Department may subsequently request any of the supporting evidence cited in the table.

After receiving feedback on the draft terms of reference from stakeholders, The Department has included the following additional assessment criteria at **1c** and **2b**:

1c *Suspected or proven incidents of fraud have been reported in a timely fashion to the Department, and reports have included the steps taken by the Service Provider to address them;*

2b *Systems in place to ensure test validity and reliability eg test content provides realistic measure of English language ability with no gender or ethnic bias, tests developed by appropriately qualified persons.*

1. Integrity

The Service Provider must provide evidence of having satisfied the following requirements over the first 12 months of operation of the tests:

- a. Regular updating of content to minimise the potential for prior knowledge of test material (specify frequency of updating in this 12 month period);
- b. Measures in place have minimised the risk of identity substitution (for example, at time of application candidates have presented their passport or national identity card with a number, photograph, date of birth and signature and on test day they have presented the same ID document);
- c. Suspected or proven incidents of fraud have been reported in a timely fashion to the Department, and reports have included the steps taken by the Service Provider to address them;
- d. Document fraud measures have been in place, including test reports incorporate security features to prevent tampering and forgery;
- e. Standardised testing conditions have been implemented including invigilators trained in detection of inappropriate use of electronic devices, maximum invigilator: candidate ratio of 1:25, and secure and independent test centre locations;
- f. If computer-based testing has been used, in addition to the requirements at (d) above, measures have been put in place to prevent candidates accessing other tools such as the internet;
- g. Standardised training and ongoing certification of test markers have been undertaken;
- h. Secure storage and control of test material have prevented unauthorised access;
- i. Systems have ensured that clerical test markers, examiners and invigilators have a competent level of English that has enabled them to fully understand the test marking policy and/or have been able to understand and comply with directions concerning relevant security practices;
- j. Systems have been implemented to ensure that clerical markers, examiners and invigilators have avoided any potential or perceived conflict of interest (that is, by not marking, assessing or invigilating candidates they have taught or with whom they have any personal connections); and
- k. Storage facilities and procedures are in place so that records of tests may be kept for a minimum of two (2) years for audit purposes and integrity checks.

2. Content of tests

The Service Provider must provide evidence of having satisfied the following requirements during the first 12 months of operation of the tests:

- a. The Service Provider's testing instrument measures all four (4) English language skills, which are reading, writing, speaking and listening;
- b. Systems in place to ensure test validity and reliability eg test content provides realistic measure of English language ability, no gender or ethnic bias, tests developed by appropriately qualified persons.

3. Administration

The Service Provider must provide evidence of having met the following requirement during the first 12 months of operation of the tests:

- a. The fee for an applicant to sit the test is reasonable.

4. Results

The Service Provider must provide evidence of having met the following requirements during the first 12 months of operation of the tests:

- a. They are able to continue to benchmark test scores against scores in other accepted DIAC tests (embedded in the Department legislation) to ensure comparability of test results. Equivalencies have been maintained during the operation of the tests and have been validated by the application of the tests during the first 12 months of operation. If necessary, there has been consultation with The Department in regard to any planned variation to the equivalencies prior to implementation;
- b. Descriptors for each score have been included in each test;
- c. There has been ongoing monitoring of short and long term performance trends and unusual patterns or changes, if any, have been investigated;
- d. The test continues to be used by other institutions/authorities as an indicator of experience and international recognition; and
- e. Test results will be available for verification for a period of at least two (2) years.

5. Deed of Agreement (online verification)

The alternative English language test providers are required to demonstrate compliance during the first 12 months of operation of the tests with the online verification aspects of the Deed of Agreement. The English language test provider must give evidence of having delivered online verification services for the Department in a timely and helpful way, including evidence that it has been responsive to The Department's requests for information relating to suspected fraud and other integrity matters.

Attachment B: Summary of providers' written submissions

Written responses from each of the three English language test providers are summarised next to the service delivery benchmark assessments as outlined in the review Terms of Reference. Complete responses from each provider are available at Attachment H.

1. Integrity

1 (a) Regular updating of content to minimise the potential for prior knowledge of test material (specify frequency of updating in this 12 month period);

All three providers regularly update their test material and updates were introduced in production during the first year of conducting tests for Student visa applicants. The frequency of updates varies between the three providers and is specific to the test component and whether the test material is compiled electronically or made available in printed format.

Educational Testing Services (ETS) advised that "half of all TOEFL tests contain 100 per cent new material" and this statement is consistent with their initial submission provided to the Department when being considered for approval in 2011. Details of frequency of updates were not provided and this was followed up with the provider during the interview.

Pearson advised that a number of new versions of the test were commissioned during the first 12 months of providing testing services for student visa applicants. Further information was sought to be provided during the interview.

Cambridge responded that they have ongoing updates and calibration cycles of test material with the next due to be completed in February 2013. PTE test forms are randomised selection of items therefore minimising the chances of same test being available by repeat candidates. Further information was also sought from Cambridge about test content update cycles.

1 (b) Measures in place have minimised the risk of identity substitution (for example, at time of application candidates have presented their passport or national identity card with a number, photograph, date of birth and signature and on test day they have presented the same ID document);

ETS response for this criterion reiterated that security measures outlined in the initial submission were continuing with only new measures instituted in China since that time being highlighted which include:

- electronic wands to detect electronic devices;
- prototype electronic jamming devices to block mobile signals at test centres; and
- experimental phase of facial recognition capabilities to match the new national ID.

Measures that are used by Pearson rely on controlled admission process with palm vein authentication, secure proctored delivery, exam holds and trend analysis. Being an electronic based test and marking process, there is also an one-to-one matching and global one-to-many matching against an existing "no test list" of individuals.

Cambridge's response focused on 152 inspections of test centre exam sessions that were conducted globally with 16 of those at Australian centres. There were 15 test centres with unsatisfactory compliance rating that were required to implement an action plan to resolve the compliance issues before testing could be resumed.

1 (c) Suspected or proven incidents of fraud have been reported in a timely fashion to the Department, and reports have included the steps taken by the Service Provider to address them;

ETS reported fraud incidents to National Allegations and Assessment Team (NAAT) in South Australia, however, cancellations of score results were not reported as requested in the *English Language test Centres Referral Procedure Manual Impostor/ID Fraud* that was distributed to all new test providers. Further information was requested from the provider for the interview.

Pearson reported fraud incidents and score cancellations to NAAT.

Cambridge reported fraud incidents and score cancellations to NAAT.

1 (d) Document fraud measures have been in place, including test reports incorporate security features to prevent tampering and forgery;

ETS' reported document fraud measures including security features were consistent with their original submission.

Pearson do not issue paper score reports for PTE Academic and any printed reports are invalid without official online verification.

Cambridge's document fraud measures were the same as described in the original submission. Information about new features to be introduced in 2013 was not available to be shared with DIAC. Electronic verification was seen as being more secure and tamper proof than paper results and would be strongly encouraged by the organisation.

1 (e) Standardised testing conditions have been implemented including invigilators trained in detection of inappropriate use of electronic devices, maximum invigilator: candidate ratio of 1:25, and secure and independent test centre locations;

ETS produce a manual on Processes, Procedures and Practices (3P) which was available to DIAC on request. All test administrators are required to complete an online training course and certification. The ETS invigilator to candidate ratios were:

- 1-25 candidates to 1 Supervisor and 1 Proctor
- 26-40 candidates to 1 Supervisor and 2 Proctors
- 41-80 candidates to 1 Supervisor and 3 Proctors

Pearson's maximum administrator to test taker ratio was 1: 15and this never exceeded due to the configuration of all test centres. Invigilators complete an annual certification with includes identity management, cheating detection, test day procedures and incident management.

Cambridge's invigilator to candidate ratio is 1:25. Inspections of test centre operations also focus on checking of training records to ensure that all invigilators attend annual training sessions which cover security and fraud prevention.

1 (f) If computer-based testing has been used, in addition to the requirements at (d) above, measures have been put in place to prevent candidates accessing other tools such as the internet;

ETS testing software automatically closes and disables all non-TOEFL internet based test windows or applications including messaging software.

Pearson test centre workstations are secured to monitor and suppress unauthorised drivers and access to other programmes. Abnormal results trigger automated hold on results while video surveillance for test duration is also available.

Cambridge's computer based tests are designed to completely 'lock down' during the test session preventing use of centre's network or interacting with the operating system or other applications such as the internet browsers.

1 (g) Standardised training and ongoing certification of test markers have been undertaken;

ETS test markers require Bachelor or Masters degree or other ESL certification plus two years' experience teaching ESL at secondary or tertiary level or comparable experience. Certification of test for markers is followed by quality control web interface (supervision by marking leaders, daily calibration test, telephone contact, defer problematic responses, validity paper insertion, examinee responses distributed to a number of markers to reduce undue influence or bias).

Location of test markers and training were not clear requiring further details to be provided during the interview with the provider.

With the majority of Pearson tests scored entirely by automated scoring engines, human markers are involved in validating automated scoring engines and provide scoring where automations does not reach a prerequisite confidence level. All Pearson human markers receive a two-day intensive oral and written training course followed by a certification exam.

Further details were requested about Pearson team structures and location of human test markers including level of qualifications and training.

- Cambridge's writing and speaking examiners are recertified annually and must have:
- education to first degree level or equivalent
- recognised TESOL qualification
- 3 years full-time relevant teaching experience within 5 years
- overall language proficiency including clear diction for speaking examiners.

General markers and clerical markers are required to pass a test for attention to detail and potential marking competency

1 (h) Secure storage and control of test material have prevented unauthorised access;

ETS advised that their internet security protocols are used by major financial institutions with communication channel using state of the art encryption system able to detect altered or disrupted transmission.

Pearson hardware and software are stored in Pearson-owned data centres. Transmissions of tests and results are encrypted with access to network protected by a multi-layer firewall and network perimeter security system.

Cambridge's review response indicated that the storage process was as per original submission. Question papers are stored in high security ideally strong safe with test rooms being windowless and on an upper floor. Test room door to be of solid construction and hinges with secure lock. Security specifications apply to all venues.

1 (i) Systems have ensured that clerical test markers, examiners and invigilators have a competent level of English that has enabled them to fully understand the test marking policy and/or have been able to understand and comply with directions concerning relevant security practices;

ETS test administrators' and markers' functions are separated with administrators subject to training and certification process. ETS Online Scoring Network is used by markers who assess tests from all over the world.

Pearson's PTE Academic is automatically scored therefore clerical and test markers are not employed in the primary scoring of tests. Test administrators/invigilators must pass certification in English.

As outlined in original submission, Cambridge's clerical markers, examiners and invigilators require appropriate level of English with markers and examiners assessed during recruitment. General markers must have General Certificate of Secondary Education pass in English or equivalent to be interviewed which is later consolidated by an aptitude test and face-to-face interview. Writing and Speaking examiners require minimum professional requirements: recognised TESOL qualification, at least three years full time, relevant teaching experience within the past 5 years and overall language proficiency including clear diction.

1 (j) Systems have been implemented to ensure that clerical markers, examiners and invigilators have avoided any potential or perceived conflict of interest (that is, by not marking, assessing or invigilating candidates they have taught or with whom they have any personal connections);

ETS test markers do not have access to any identifying information of candidate. Administrators not involved in English language instruction or test preparation and are prohibited from administering test if appearance or possibility of conflict of interest.

Pearson administrators/invigilators unable to access test content due to encryption. In high risk regions, test administrator workstations are subject to video monitoring. Test registration and issuance of results is managed centrally and not by test centre personnel.

Cambridge's onscreen marking has reduced risk of conflict of interest in examining writing tests due to scripts being randomised and anonymous. Systems for paper based and general markers remain as per original submission. Central marking and processing of exam results is in the UK for paper and online tests.

1 (k) Storage facilities and procedures are in place so that records of tests may be kept for a minimum of two (2) years for audit purposes and integrity checks;

TOEFL test results, test taker's photograph and their spoken and written responses are stored for two years. Score files stored in secure, access-restricted. Constructed responses stored securely with no personally identifiable information metadata.

PTE test records are available for 2 years and then archived.

Cambridge retains permanent records of all tests including individual papers and overall mark. Online verification is available for two years and much longer.

2. Content of Tests

2 (a) The Service Provider's testing instrument measures all four (4) English language skills, which are reading, writing, speaking and listening;

All three providers measure all four English language skills of reading, writing, speaking and listening.

2 (b) Systems in place to ensure test validity and reliability eg test content provides realistic measure of English language ability, no gender or ethnic bias, tests developed by appropriately qualified persons;

ETS listed extensive research projects to validate TOEFL testing and its international reputation.

Pearson advised that prior to introduction in 2009, PTE Academic was subject to extensive field testing and trialling in its development with 10000 test takers from 158 countries with 126 language groups. Pearson's response included Appendix 7 'PTE Academic Research profile' which provided detail on the range of research projects which support the validity and reliability of PTE Academic.

Cambridge response contained statements that CAE content continues to be tested to ensure test validity and reliability, both during 'routine test construction' and during 'post-exam processing'. CAE research programme includes 5 funded research projects investigating aspects of the exam.

3. Administration

3 (a) The fee for an applicant to sit the test is reasonable;

TOEFL test fee in Australia is AUD \$230 and is scaled to appropriate rates in each country. Test fees are available on ETS website

PTE test fee varies by country from US\$147 to US\$345 and is \$330 in Australia. Test fee information is available on Pearson's website

CAE test cost in Australia was reduced from AUD\$368 to AUD\$270. Test fees are not listed on Cambridge's website.

All three providers were asked to provide further information at the interview about general principles in setting fee levels in each country

4. Results

4 (a) They are able to continue to benchmark test scores against scores in other accepted DIAC tests (embedded in the Department legislation) to ensure comparability of test results. Equivalencies have been maintained during the operation of the tests and have been validated by the application of the tests during the first 12 months of operation. If necessary, there has been consultation with The Department in regard to any planned variation to the equivalencies prior to implementation;

ETS advised that the TOEFL test was accepted by University of Melbourne, Australian National University and the University of Adelaide as well as by institutions in the VET sector. ETS offered 3000 free test vouchers to selected universities in Australia for students from China, India, Indonesia, Thailand, Vietnam and Chile to help with take up.

ETS has commissioned a research report by Alan Olsen who is an Australian international education expert on English Entry Channels by students at Australian universities comparing academic achievements by IELTS and TOEFL tested students. The research covers students who completed their English tests during 2012 and is expected to be completed in 2013.

Pearson's response referred to field tests during PTE development and included an extensive list of research comparisons between PTE Academic, IELTS and TOEFL. Appendix 11 of their response contains details of various research reports.

CAE is benchmarked against IELTS with an exam results converter being introduced in the last 12 months allowing easier conversion of CAE results into IELTS test scores.

4 (b) Descriptors for each score have been included in each test;

ETS provides performance descriptors of TOEFL score levels which are also available on their website.

PTE is aligned with the Common European Framework of Reference for Languages (CEF or CEFR). Pearson's response also contained Appendix 12 Interpreting the PTE Academic Score Report

CAE score descriptors were created using research by the Association of Language Testers in Europe (ALTE). Descriptors are available on pages 9 and 10 of 'Information for admissions officers, policy makers and other education professionals' which can be downloaded from website.

4 (c) There has been ongoing monitoring of short and long term performance trends and unusual patterns or changes, if any, have been investigated;

ETS advised that analysis is conducted by trained statisticians of every test centre to ensure comparability of scores across different tests. Long-term and short-term trends are reviewed by ETS statisticians and the ETS Office of Testing Integrity. Anomalies are identified and investigated. New analysis allows ETS to evaluate inconsistent performance which may provide evidence that an individual or group may not have completed the test independently.

Pearson reiterated that automated analysis flags anomalies for review by security personnel.

Cambridge conducts routine statistical analysis to identify unexpectedly high performance in one component; unusual pattern of responses in common and unusual performance changes in different tests. This is also supported by Common Wrong Answer (CWA) analysis.

4 (d) The test continues to be used by other institutions/authorities as an indicator of experience and international recognition; and

ETS advised that the TOEFL test is recognised by 8,847 institutions and authorities worldwide with 132 in Australia that are registered as Designated Institutions to receive TOEFL scores.

PTE Academic is used by approximately 3,000 programmes worldwide including:

- UK Border Agency for Tier 1,2 and 4 visas;
- Irish Naturalisation and Immigration Service;
- 75 per cent of US Ivy League colleges;
- 96 per cent of UK institutions;
- 36 Australian universities; and
- 200 Australian TAFEs and RTOs.

CAE is recognised by over 3,000 organisations in over 100 countries with 202 institutions recognising CAE in the last 12 months. UK Border Agency accepts CAE for study, work and spouse visas. In Australia, 32 of 39 universities formally accept CAE. Cambridge have established a dedicated office in Sydney investing in promoting and growing recognition of CAE for visa application and university admissions. Cambridge advised that an online recognition database is available listing all organisations that accept CAE.

4 (e) Test results will be available for verification for a period of at least two (2) years;

TOEFL scores are valid and available for verification for a period of two years from the date of the test administration.

PTE test results are available for online verification for two years and then automatically archived.

Details of CAE tests are available for at least two years with online verification continuing from the verification website.

5. Deed of Agreement

The alternative English language test providers are required to demonstrate compliance during the first 12 months of operation of the tests with the online verification aspects of the Deed of Agreement. The English language test provider must give evidence of having delivered online verification services for the Department in a timely and helpful way, including evidence that it has been responsive to The Department's requests for information relating to suspected fraud and other integrity matters.

TOEFL online verification system is used by 1011 staff members at 132 institutions in Australia and 166 DIAC and DFAT staff worldwide. Introductory material was sent to all DIAC and DFAT offices in October 2011 which was followed by training webinars conducted in Jordan, Sri Lanka, Hong Kong, the Philippines, Malaysia, India, Papua New Guinea, China and London.

In October 2012, the TOEFL registration system was changed to require test takers to indicate the country in which they plan to use their scores. This makes it possible to identify individuals whose scores may be used for Australian visa purposes, allowing ETS TOEFL to inform DIAC when scores are cancelled. ETS advised that there were 49 instances of communication with DIAC or DFAT staff where 38 test taker scores were verified and 11 were sent to the Office of Testing Integrity (OTI) for further investigation.

OTI received 101 score inquiries from Australia and responded within 1-3 weeks:

- 11 inquiries from DFAT/DIAC resulting in nine score cancellations, one score being cleared and one person offered a retest.
- 90 inquiries from universities, resulting in five scores being cleared, four scores were under review, 74 scores were cancelled and seven scores determined to be fraudulent because the test taker had altered the results.

ETS introduced an audit trail in response to DIAC's integrity service standards under 1(c) to enable ETS to inform score users when scores are cancelled for individuals whose scores were previously verified.

The review team sought further information from ETS about their understanding of fraud reporting requirements as outlined in NAAT's manual. The number of cancelled score results (74) referred by Australian universities prompted investigation whether English language test providers' obligations in the service delivery agreement extend to reporting of cancelled test score results that were not submitted with a visa application.

PTE online verification system (Score report website) requires the test taker to assign their test score to an individual/organisation. Users cannot conduct general searches and are only able to view results assigned to their institution/organisation.

Pearson advised that 69 DIAC staff have access to the Score report website and over 900 staff from Australian education institutions. Details of scores assigned to Australian institutions can be provided to DIAC on request.

Cambridge advised that during October/November 2011, 19 training sessions were held around the world – many as web presentations. Cambridge continue to assist DIAC through online verification. Access to view the results can only be granted by the test candidates who supply their candidate ID and secret number directly to DIAC to allow verification of their result.

The review team sought further clarification of the online verification processes for PTE and CAE tests especially how test takers assign their results to DIAC staff for online verification.

Attachment C: Interview questions for providers

Documents at Attachment C have been removed for privacy considerations.

Attachment D: Survey of visa processing staff

Purpose of survey

As part of the review of the implementation of alternative English language proficiency tests (AELPT) by Pearson, ETS TOEFL and Cambridge, feedback was sought from offshore and onshore visa processing officers (VPOs) who processed Student visa applications. The aim of the survey was to establish whether VPOs had processed Student visa applications where the English language test was one of the following alternative tests to IELTS.

- TOEFL paper and internet (pBT and iBT);
- Pearson Test of English Academic (PTE); or
- Cambridge English; Advanced also known as Certificate in Advanced English (CAE).

As well as seeking feedback from VPOs about their experience with the alternative English language tests and providers, the focus was also on visibility of the new providers and ease of use of their online verification services.

Methodology

The survey was conducted using a web based platform named SurveyMonkey® which is used for internal surveys conducted by the internal audit area. The survey was designed to ask a range of questions on the three alternative English language tests. Survey questionnaire and results from the survey platform follow this analysis.

In total 26 surveys were sent including two offshore posts, London (8) and in New Delhi (4) as well as two onshore Student visa processing areas Adelaide (10) and Melbourne (4). Principal Migration Officers and processing centre managers were emailed and requested to forward a web link for the survey to VPOs processing Student visas. The survey was conducted over 18 days commencing on 8 January 2013 and closing on 25 January 2013.

Summary

During the twelve month review period from December 2011 to November 2012, there were 16,143 English language tests submitted with Student visa applications. Just over 97 per cent (15,693) of the tests were conducted by IELTS with the remaining 3 per cent (447) conducted by the alternative English language providers. Student visa applicants also submitted three Occupational English Tests (OET) during the review period.

Of the 26 VPOs surveyed, 24 completed the entire survey. Overall, four VPOs did not have any exposure to the three alternative English language tests/providers while 20 VPOs had some exposure:

- 6 VPOs had extensive exposure (more than 11 test scores).
- 6 VPOs had moderate exposure (6 to 10 test scores) and
- 8 VPOs had limited exposure (1 to 5 test scores)

Based on the number of alternative tests observed, VPOs indicated that the internet based TOEFL iBT test was the most observed test with 70 per cent, followed by Pearson at 20 per cent.

When asked to describe their experiences in online verification of test scores, 65 per cent of the VPOs experienced some inconvenience with the verification process based on number of issues:

- 15 per cent had many issues
- 35 per cent had a few issues
- 15 per cent had one issue

At the same time, 25 per cent of VPOs had no issues with accessing the online verification systems. The majority of online verification issues related to the Pearson test which required the test taker to authorise DIAC in order for their test result to be verified online. Delays in test results being available online were also cited.

One response also highlighted that the arrangements for the alternative English language tests were new and that “there was little awareness with the test providers and also in DIAC as to the procedures with verification”.

VPO responses when asked if there were any other comments emphasised that the IELTS verification process was preferred as it was streamlined and much easier to access.

In relation to the verification arrangements, the level of input in monitoring and intervention required by the English language test provider policy team was minimal with all providers handling access for test scores and quality control issues through their own websites.

Based on the VPO survey results, the implementation of the alternative English language tests in the Student visa programme has been achieved although the number of students choosing those tests was very low in comparison to IELTS as 97 per cent of Student visa applicants chose to do an IELTS test during the review period. There are probably many factors for the low take-up rate including marketing by providers, cost of tests, accessibility and it could be that a longer transition timeframe is required for the new arrangements to become part of the standard practice for the Student client group.

Visa Processing Officer survey






1. Rate your experience with or exposure to alternative English language tests (Pearson, Cambridge CAE, TOEFL iBT).

		Response Percent	Response Count
NIL		16.7%	4
Limited (1 - 5 test scores)		33.3%	8
Moderate (6-10 test scores)		25.0%	6
Extensive (more than 11 test scores)		25.0%	6
answered question			24
skipped question			2






2. Which alternative English language test results have you accepted with applications for student visas?

		Response Percent	Response Count
TOEFL iBT		70.0%	14
Pearson		20.0%	4
Cambridge CAE		0.0%	0
Do not remember		10.0%	2
answered question			20
skipped question			6

3. If you have accepted more than one of the tests from a test provider listed at Question 2, which test has been the most numerous?

		Response Percent	Response Count
TOEFL IBT		66.7%	12
Pearson		11.1%	2
Cambridge CAE		0.0%	0
Do not remember		22.2%	4
answered question			18
skipped question			8

4. When you have attempted to verify an alternative English language test score, how would you describe your experience?

		Response Percent	Response Count
Not applicable		10.0%	2
Without issue		25.0%	5
One issue		15.0%	3
A few issues		35.0%	7
Many issues		15.0%	3
answered question			20
skipped question			6

5. Please describe any issues you may have had with online verification (please give the name of the test provider if you can).

	Response Count
	13
answered question	13
skipped question	13

6. Do you have any further comments about the implementation of the alternative English language tests?

Response
Count

9

answered question 9

skipped question 17

Attachment E: Student survey feedback

Purpose of survey

The aim of the survey was to establish overall satisfaction with alternative English language tests selected by students. The alternative tests to IELTS were:

- TOEFL paper and internet (pBT and iBT);
- Pearson Test of English (PTE) Academic; or
- Cambridge English; Advanced also known as Certificate in Advanced English (CAE).

As well as seeking feedback from applicants for Student visas about their experience with the alternative English language tests and providers, the focus was also on ease of use of their English testing services.

Methodology

The survey was conducted using a web based platform named SurveyMonkey® which is used for internal surveys conducted by the internal audit area. The survey was designed to ask a range of questions on the three alternative English language tests.

The initial survey questionnaire was emailed to Student visa applicants identified from departmental systems who had completed one of the alternative English tests and where contact details in Australia were available. There were considerable difficulties in obtaining up to date contact details for students and even with access to DEEWR's (PRISMS) data, contact details were only available for 28 students. Of these students, 20 completed PTE test, 6 completed TOEFL and 2 completed CAE test

Students were emailed or telephoned requesting them to access a web link to complete the survey. The survey was conducted over 18 days commencing on 8 January 2013 and closing on 25 January 2013, although the closing date was extended to 31 March due to poor response. As at 5 April 2013 a total of 14 students had responded to the invitation to complete the survey this is 50 per cent of those contacted. The low numbers of students contacted is attributable to difficulty in obtaining up-to-date student contact details as most visa applications are made offshore where students submit an offshore residential address, offshore contact telephone number or use a migration/education agent.

Due to the poor response a further survey was conducted via the Department's Migration blog facility including advices on twitter and Facebook. The student survey was uploaded on 6 May and concluded on 20 May 2013. There were 767 completed surveys during the two weeks, however, survey response also included student who completed an IELTS test as it was not possible to restrict the questionnaire to only those students who completed one of the alternative English language tests.

Unlike the emailed survey questionnaire, the Migration blog survey is anonymous and there may be some data qualification as it is not possible to confirm that all respondents were in fact Student visa applicants.

Summary

Combing the results from the initial email survey and the follow up Migration blog survey, 781 students completed the questionnaire. Of these 92 per cent or 718 chose an IELTS test, followed by 27 who completed a TOEFL iBT test with 10 completing a PTE test and 9 completing a CAE test.

	IELTS	CAE	PTE	TOEFL iBT	Do not remember	(blank)	Total
Email survey	0	1	7	4	0	2	14
Migration blog survey	718	8	3	23	11	4	767
Total	718	9	10	27	11	6	781

Of the 46⁷ students who chose one of the alternative English language tests, 17 indicated that their decision was based on the reputation of test, 13 favoured location of test centre while 11 indicated that the cost of the test was the main reason.

Of the alternative English tested students, 72 per cent or 35 completed their test outside Australia while the remaining 28 per cent or 13 students completed the test in Australia. Information was provided to 62 per cent or 30 students prior to the test. Security measures were observed by the majority of students. More than 50 per cent of students received their test result within 1 to 4 week.

Just over 85 per cent or 41 students indicated that they would choose the same alternative English language test again if required.

IELTS survey analysis

The Migration blog survey responses from students who completed an IELTS tests provides useful information which could be compared with the results from students who chose an alternative English language test. It is important to emphasise that English language testing arrangements by IELTS are outside the scope of the current review of alternative English language tests.

Of the 718 survey respondents who indicated that they completed an IELTS test, their reasons for choosing the test are:

Cost	27 (04 per cent)
Location of test centre	165 (23 per cent)
Reputation	277 (39 per cent)
(blank)	249 (35 per cent)

Consistent with the alternative test responses, IELTS was selected predominantly based on its reputation followed by location of test and the cost of the test.

From the free text comments provided by those (249) who did not provide a reason for selecting the IELTS test, it appears that the majority of 243 comments indicated that the test candidates did not have a choice about their English language test and that IELTS was the main test that was acceptable and specified by the Department or recommended by their agent. Some indicated that an IELTS test was selected because of its availability in their location and that the test was a requirement for permanent residence applications.

⁷ Although 14 students had completed the email survey, two did not select a test which means that with the 34 Migration blog surveyed students a total of 48 students had been identified as completed an alternative test.

In comparison to 85 per cent of the alternative tested respondents who would choose the same test again in the future, a lower proportion at 72 per cent of IELTS tested respondents would choose the same test again. Of the 24 per cent (178) who would not choose the same test, 148 people provided reasons. About 40 per cent of the reasons related to the marking system which ranged from perceived unfairness in scores .5 below requirements, inconsistent scores for repeat tests and lack of transparency and feedback. Almost 16 per cent of respondents referred to the high cost of the test including possible lack of choice in available tests which may contribute to the fee structure. A similar proportion of respondents 15 per cent claimed that the test was too complex with some questions designed to test intelligence and academic capability instead of English language. Just over 5 per cent of respondents indicated that they would consider taking one of the alternative English language tests in the future.

While the slightly higher negative feedback for IELTS is of interest, it does not detract from the finding that just under three quarters of respondents would still select IELTS for their next test if required. Perhaps more detailed analysis of broader feedback from the Global Feedback Unit, Ministerial Correspondence, education providers and skill assessment authorities may be considered in establishing whether there are any concerns with the existing IELTS testing arrangements in various visa programmes. Again, it is worth reiterating that IELTS tests are not within the current review scope of alternative English language test arrangements and the above information is presented for information only.

Student survey - Review of English language tests



1. Which test did you use?

		Response Percent	Response Count
TOEFL iBT		2.9%	23
Pearson PTE		0.4%	3
Cambridge CAE		1.1%	9
IELTS		94.1%	737
Do not remember		1.4%	11
answered question			783
skipped question			4

2. Why did you choose this particular test?

		Response Percent	Response Count
Cost		6.7%	35
Reputation		57.3%	300
Location of test centre		36.1%	189
Other (please specify)			281
answered question			524
skipped question			263




3. In which city did you take your test?

	Response Count
	764
answered question	764
skipped question	23





4. How much did you pay for the test you took?

	Response Count
	749
answered question	749
skipped question	38




5. Did you receive information from the English language test provider before you completed your test?

		Response Percent	Response Count
Yes		65.4%	500
No		21.8%	167
Do not remember		12.8%	98
	answered question		765
	skipped question		22

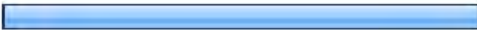



6. Do you remember what type of security measures were in place at the test centre on the day of your test?

		Response Percent	Response Count
Supervisors		73.8%	564
Identity checks		86.4%	660
Security cameras		28.3%	216
Do not remember		4.5%	34
	Other (please specify)		35
	answered question		764
	skipped question		23



7. Was the test material relevant to you?

		Response Percent	Response Count
Yes		63.1%	482
No		29.7%	227
Do not remember		7.2%	55
answered question			764
skipped question			23

8. How long after your tests did you receive the results?

		Response Percent	Response Count
1 to 4 weeks		89.5%	688
1 to 3 months		7.9%	61
3 months or more		0.5%	4
Do not remember		2.1%	16
answered question			769
skipped question			18

9. Would you choose the same English language test again if you needed to take another test for the same visa or another visa?

		Response Percent	Response Count
Yes		74.9%	574
No		25.1%	192
If no, please give a reason			170
answered question			766
skipped question			21

Attachment G: Key stakeholders consulted during the review

Name	Position	Purpose
Ian McGraw	Manager , SA, National Allegation Assessment Team	Assessment of providers' integrity responses
Mandy Edwards		
	Student policy Section	Input on the draft report including whether the alternative English language tests met the Student visa programme objectives
	Student Policy Projects Section	
	Student Implementation Taskforce	
Michelle Pearce	Director, Human Capital Section	Feedback on draft report
	Visa Processing Officers	Survey
	Student visa applicants	Survey
Bruce Needham	Global Manager Temporary Entry/Students	Feedback on draft report
	Educational Testing Service –	Deliver English language test – Teaching of English as a Foreign Language (TOEFL and internet based iBT)
	Pearson Australia Group	Deliver English language test – Pearson Test of English (PTE) Academic
	Cambridge English Language Assessment	Deliver English language test – Cambridge English: Advanced (CAE)

Attachment H: Written submissions from alternative English language test providers

Documents at Attachment H have been removed for privacy considerations.