



11 December 2022

Committee Secretary  
Joint Standing Committee on Foreign Affairs, Defence and Trade  
PO Box 6021, Parliament House  
Canberra ACT 2600

## Submission to the Joint Standing Committee on Foreign Affairs, Defence and Trade inquiry into Australia's tourism and international education sectors

### Introduction

Duolingo welcomes the establishment of the Joint Standing Committee on Foreign Affairs, Defence and Trade inquiry into Australia's tourism and international education sectors.

Duolingo's mission is to use technology to make education accessible to everyone in the world. Our language learning app is the world's most popular way to learn a language, with nearly 60 million monthly active users, learning over 40 different languages.

We believe that digital innovations in education and assessment delivery have the potential to significantly advance Australia's international education sector, as they already have for other countries, by greatly expanding the scope, reach, and diversity of its applicant pool, enhancing the resilience of its admissions and migration systems and ultimately providing the best experience for students.

In particular, our experience working with migrants, governments, and universities alike - as well as the lived immigrant experience of many of Duolingo's staff - has repeatedly shown us that meeting traditional paper-based language testing requirements are one of the most overlooked, yet most outdated and most difficult parts of the journey of an international student or migrant.

It is that experience that has led us to create the digital Duolingo English Test, which costs 80% less than comparable alternatives and is now relied on by over 4,000 of the top universities, governments, and businesses around the world.

We therefore respectfully make the following submission for consideration by the Committee.

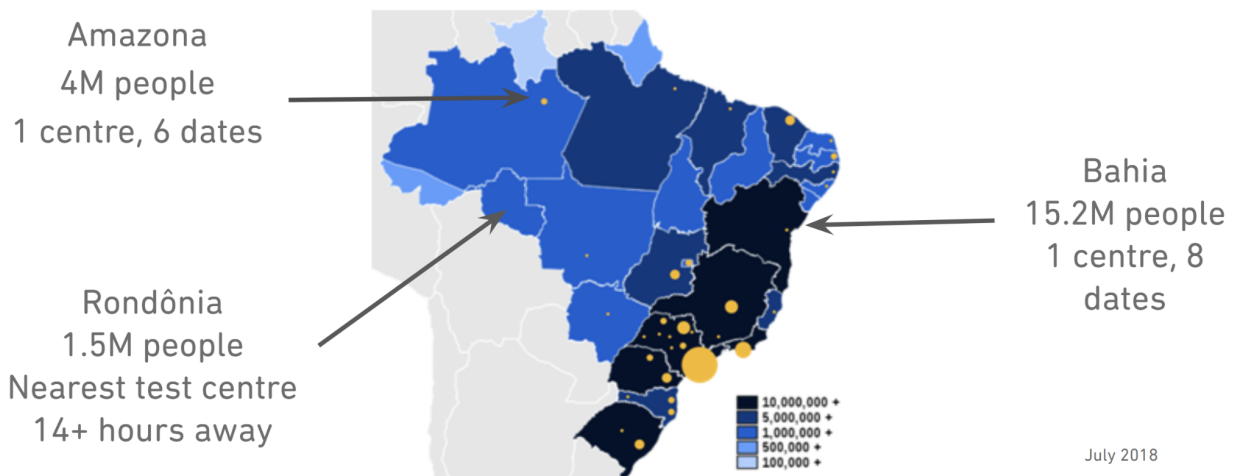


## Outdated paper-based testing requirements create barriers to studying in Australia

Like many other English-speaking countries, Australia requires prospective international students to demonstrate English language proficiency in order to obtain a student visa. However, it is one of the few countries that continues to require that such proficiency be demonstrated through traditional, paper-based tests.

This seemingly-innocuous provision turns out to have profound impacts on the migrant experience (including those seeking permanent migration and temporary migration to study or work), because paper-based testing requirements impose three massive barriers to migrants to Australia.

- **Accessibility:** Sitting for one of these paper-based tests begins with finding an available test centre and appointment slot. Unfortunately, many countries have no test centres at all, while even well-resourced countries often have extremely limited capacity for test takers. The below figure of Brazil is representative of the challenges faced by migrants, depicting the reach of one of the major paper-based tests relied on by Australia:



Even when a testing centre is geographically available, frequency and capacity restrictions mean that appointment slots often fill up very rapidly, requiring test takers to make plans many months in advance. Any issue with that appointment (illness, transportation, or test cancellation by the provider) could lead to months of delay, potentially costing the test taker their window of opportunity to migrate.

- **Reliability:** The past several years have demonstrated the lack of resilience in the paper-based test centre network. In many locales, public health restrictions relating to social distancing or travel made paper-based testing nearly impossible, with many Chinese test centres still remaining closed even in 2022. Human conflict (as seen in Afghanistan, Syria, and Ukraine), environmental disasters (such as the 2022 Pakistani



floods), and widespread criminal fraud (such as in Vietnam in late 2022<sup>1</sup>) have also resulted in the closure of test centres or severely limited test takers' ability to travel to test centre appointments.

- **Affordability:** Finally, Australia requires migrants to pay private testing companies substantial amounts of money to take these paper-based tests. On average, each test costs hundreds of dollars, more than double the average monthly salary in many countries around the world. These figures do not include travel and lodging required to access the test, nor the fact that traditional paper-based tests often require even successful test takers to sit for multiple tests for a variety of reasons. Indeed, meeting this requirement often ends up as one of the most expensive parts of the international student experience..

It is no wonder, then, that research finds that Australian migrants (regardless of socioeconomic status) uniformly complained that the cost of such tests was “**intolerably exorbitant**” and “unaffordable to the majority” of their compatriots,<sup>2</sup> and that in their view, the high cost and need for continual retakes of the test was simply a reflection of private companies' profit-seeking from migrants without alternatives.<sup>3</sup>

These barriers have been in place for many decades. For example, our own co-founder and CEO Luis von Ahn, who grew up in Guatemala but left to pursue university studies abroad, needed to (at great expense and danger to his personal safety) fly to El Salvador to undertake an English test because he could not take an English test in Guatemala at the time. And while reliance on such a paper-based system might have been a necessity in those days, decades later it stands out as a uniquely outdated requirement in an otherwise digitising process.

In short, for Australian migration and its international education sector to become more resilient and competitive, it cannot continue to rely on inadequate physical test centres or require aspiring migrants to pay months of their salary to private companies before even being considered.

### **Countries and universities around the world are switching to digital testing to enhance their competitiveness**

By contrast, elsewhere around the world, countries and universities have made use of recent innovations in education technology and digital security to help eliminate their reliance on paper-based tests and physical test centres. Because modern secure digital tests can be accessed nearly anywhere and cost upwards of 80% less, countries and universities that adopt

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<sup>1</sup> Tuoi Tre News, “[Vietnamese authorities suspend foreign language exams amid quality concerns](#)” (11 November 2022).

<sup>2</sup> Hoang, Ngoc. (2019). Building a Validity Argument for the Use of Academic Language Tests for Immigration Purposes. *Language Education & Assessment*. 2. 135-154.

<sup>3</sup> M. Rumsey et al. (2016). The consequences of English language testing for international health professionals and students: an Australian case study. *Int. J. Nurs. Stud.* (reporting strong negative perception of traditional paper-based tests as too commercial, given the high cost and need for continual retakes).



such tests not only radically improve the experience for their applicants, but also find that they are significantly more competitive internationally, as they are able to attract a substantially broader, more diverse group of students and migrants.

Today, secure digital English test results are accepted as evidence of proficiency by over 4,000 of the top universities around the world, including Australian National University, Imperial College London (UK), Trinity College Dublin (Ireland), University of Toronto (Canada), Yonsei University (South Korea), and more. And among American universities, adoption of digital English testing is near universal, including by MIT, Yale, Stanford, Caltech, Columbia, Duke, Johns Hopkins and thousands more.

Moreover, following this successful trend in their international education sectors, governments of Australia's key competitor destinations have also begun accepting digital English tests for student visas. **Today, an international student seeking a university student visa no longer needs to sit a paper-based English test to apply to the United States, United Kingdom, Canada, Ireland, New Zealand, or elsewhere - but must do so in order to apply for Australia.**<sup>4</sup>

Countries and universities are adopting digital tests for three reasons:

1. **They want to be able to recruit from a wider pool of potential candidates.** Physical testing centres are not distributed equitably across the globe, so countries and universities that rely on them are limited in who they can recruit. By contrast, each year, students from nearly 200 different countries and over 20,000 cities take digital tests of English proficiency, often because a physical test would be unaffordable or impossible to access.
2. **The pandemic highlighted the need to build resilient systems.** When the pandemic hit in 2020, testing centres around the world shut down, and countries and universities that relied on those testing centres found themselves stranded without applicants. By contrast, those accepting digital tests were able to seamlessly continue operating without any disruption at all.
3. **They want to have competitive admissions policies and migration programs.** Institutions that adopted digital tests during the pandemic quickly found that it significantly improved their applicant pools – not only by strengthening the quality of the students, but also by broadening and diversifying the pool of candidates, enabling them to recruit students they never would have been able to before. Other institutions and governments followed suit to avoid a self-imposed disadvantage to their competition.

Of course, the advantages of digital tests are well-known even outside of language assessment; for example, the Australian government has already switched exclusively to

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<sup>4</sup> Governments have done so in several ways. The US, UK, Canada, and New Zealand rely on universities' assessments of students' English to grant a visa, and permit universities to in turn rely on digital tests to determine English. Ireland have themselves adopted digital tests to be acceptable in student visa applications. Finally, the UK has taken the adoption of digital tests even further and is now piloting digital English tests for all migration visas, not just student visas.



digital testing to administer financial exams.<sup>5</sup> Nor is high-stakes digital language testing limited to just Duolingo - all of the other leading high-stakes English test providers are now also developing and launching digital English tests in light of demand from universities, countries, and test-takers.

### **Proposal for Australian student visa digital testing pilot**

Fortunately, Australia is in a position to follow this trend and take advantage of the benefits of digital testing with minimal changes to existing Australia migration policy.

Under the existing simplified student visa framework, the Department of Home Affairs ("Department") already permits eligible categories of universities and students to rely on digital tests of English for admissions and visa purposes.<sup>6</sup>

However, unlike other countries, Australia introduces two significant uncertainties into this process. First, eligibility for simplified visa processing shifts every six months; second, the Department reserves the right to require even eligible students to nevertheless take a paper-based test, at any time during the visa process.

Critically, because paper-based test appointments require so much advance notice to book, even the threat of such a request means that students and universities have little choice but to rely on paper-based tests. Otherwise, even if an eligible student wins admission based on a university-approved digital test and successfully applies for their visa, their student visa application and Australian study experience could be compromised if their eligibility changes, or if they are suddenly required to take a paper-based test at the last minute and are unable to find an appointment.

Accordingly, to improve the student experience and resilience of the sector, we respectfully recommend that the Department pilot the use of digital testing for student visas in a consistent manner across the international education sector. **Specifically, we propose that if an international student wins acceptance to an Australian university relying on a university-accepted digital test of English, the Department should accept that same test result for their student visa, rather than requiring them sit an additional paper-based test, provided that it continues to monitor the status and progress of the student.**

Such a pilot has five key advantages:

- **It enhances the competitiveness of Australian universities.** As noted above, universities around the world are shifting towards digital testing in recognition that talented international students have wide choice in international higher education. Amongst their international counterparts, Australian universities are unique in their inability to make use of digital testing.

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<sup>5</sup> See Corporations (Relevant Providers—Education and Training Standards) Determination 2021 [F2021L01714]

<sup>6</sup> Specifically, depending on the university and their country of origin, a student may take a digital test to demonstrate their English proficiency for admission purposes, and will (likely) not be required to separately demonstrate English proficiency with a paper-based test for visa purposes.



- **It does not require a significant change in policy.** Existing migration policy already permits many universities and students to rely on digital English tests in theory, but regulatory uncertainty leaves it infeasible in practice. By harmonising eligibility across the international education sector and reducing regulatory uncertainty, this pilot would make it feasible for universities and students to actually take advantage of existing policy.
- **It is narrowly tailored towards low-risk, high-priority migrants.** The only migrants affected by such a pilot are academically talented students that have already been admitted to Australian universities and demonstrated to their university's satisfaction their academic and English qualifications - a key focus of Australian migration policy.
- **It provides substantial regulatory certainty while avoiding imposing mandates.** Universities that do not wish to rely on digital tests are not required to; the pilot simply provides them regulatory certainty if they choose to do so.
- **It provides the Department with a rich dataset on a key migration tool, while avoiding commitments or lock-in.** By limiting the pilot to students and university-approved digital tests, but avoiding prescriptive requirements, the Department can gather a broad range of data (including academic results) on this key migration tool while avoiding committing itself to any particular solution.

## Conclusion

It is unsustainable for Australia to continue imposing substantial barriers on talented international students when other countries have long ago removed them.

English language proficiency requirements serve an important role in Australia's migration policy, particularly for international education. But Australia's requirement for paper-based tests to meet such requirements is both outdated and harmful to its international education sector, one of Australia's largest and most geopolitically important exports.

In specific reference to the themes of this inquiry, introducing secure digital language assessment has the opportunity to provide unprecedented resilience to the sector's admissions and visa granting processes and greatly enhance the student experience by removing barriers of access, cost and unreliability which are imposed by paper-based testing centres.

We therefore respectfully suggest that the Department undertake a digital testing pilot for student visa to ensure that Australian migration and international education remain competitive on the international stage.

Sincerely,

James Holden

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Hobart - Tasmania

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