

Committee Secretary
Joint Standing Committee on Migration
PO Box 6021
Parliament House
Canberra ACT 2600
Australia

5 August 2011

Sent via Email: jscm@aph.gov.au.

Dear Sir/Madam,

SUBMISSION FROM EDUCATIONAL TESTING SERVICE

Thank you for the opportunity to make a submission to the Joint Standing Committee on Migration. Educational Testing Service (ETS) is pleased to provide this submission in respect to the Inquiry into Multiculturalism.

As a global non-profit educational assessment and research organisation, the largest of its kind, ETS is well placed to share insights into skilled migration policy settings. This submission will restrict its scope to the Inquiry's terms of reference concerning "national productive capacity" and specifically the current skilled migration regulations.

ETS supports Australia's use of English proficiency testing as a mean of assessing the likelihood of successful migration settlement. However, ETS believes that Australia can attract a wider range of qualified applicants if it allows competition in English testing providers for skilled migration purposes.

This Inquiry is timely to ensure Australia continues to maximise the economic benefits from a well targeted skilled migration program and we trust that the comments made in this submission will be helpful in your deliberations.

Given our almost 50 years of international engagement, ETS is in the unique position of being able to testify to the benefits of a strong, vibrant and inclusive multicultural society. From our global perspective we see multiculturalism as a social, cultural and economic asset for countries around the world. ETS supports the

Australian government's strong commitment to multiculturalism and is pleased to play a part in the realisation of this goal.

Our key contact in Australia is Helen Cook, Associate Director, Client Relations, Australasia. Helen can be contacted on 0408 078 052 or hcook@ets.org if you or your team have any questions regarding the statements made in our submission or for further information. Ms Cook will also be available to speak regarding this submission at any time and location of the committee's convenience.

We wish you well with the Inquiry and look forward to the release of the Report.

Yours sincerely

Eileen Tyson
Executive Director
Global Client Relations
Educational Testing Service

1. The TOEFL Test and Australian English Proficiency Migration Settings

ETS is the largest non-profit educational assessment and research organisation globally. ETS provides quality and equity in education for people worldwide by creating English based assessments that are developed from rigorous research. Founded in 1947 ETS develops, administers and scores more than 50 million tests annually including the TOEFL® test.

The Test of English as a Foreign Language™ (the TOEFL test) is the most widely recognised English language test, being accepted by more than 8000 institutions, professional bodies and government agencies in 130 countries, including nearly every college and university in Australia.

Under the Australian Migration Regulations 1994, applicants seeking to attain a range of student and skilled migration visas are required to take English language proficiency tests. Currently, students from DIAC Assessment level 3 and 4 countries such as China and India along with all skilled migrants have only one test available to them to demonstrate their English language proficiency as part of the visa application process to study or work in Australia. This is the International English Language Testing System or IELTS test.

On 20 May 2011, the Minister for Immigration and Citizenship, the Hon. Chris Bowen MP announced that the Government had accepted the TOEFL test as an alternative English proficiency test for student visa purposes. Once the policy is implemented, students from key markets will be allowed to use the TOEFL test to demonstrate their English language proficiency as part of the visa application process to study in Australia. We believe this will advance Australia's reputation as a leading provider of education and training in an increasingly competitive and challenging marketplace.

ETS welcomes the TOEFL test's inclusion for student visa purposes. We see this positive outcome as the culmination of a strong and sustained working relationship between ETS, the Australian Government and the Department. In 2009 the Department of Immigration and Citizenship (DIAC) initiated a process seeking to expand the number of English language tests that are accepted as evidence of English language proficiency. DIAC sought submissions from interested test owners on their ability to provide English Language testing for Australian visa student and skilled migration applications. These submissions were evaluated by the department against 24 certain benchmarks and criteria.

ETS is in the process of finalising administrative arrangements with DIAC for the TOEFL test to be used for student visa processing for Australia from designated 'high risk' countries. We are very confident that this process will be successful and appreciate the DIAC Student Visa Section's consultative approach to ensuring that the transition functions effectively. ETS also believes that effective equivalency scores between the TOEFL test, IELTS and other English Proficiency tests will be established to ensure DIAC will be able to rely on an effective comparative base to use multiple tests.

The decision by the Government to introduce alternatives to the IELTS test, for student visa application purposes, will now introduce competition and will strengthen the quality and diversity of applicants seeking to study in Australia. The strength of ETS and the rigour and reach of the TOEFL test into key markets around the world is an opportunity that will be realised in Australia due to the changed visa requirements for English language proficiency.

Through its wide reach around the world, Australia can now benefit from the marketing opportunities ETS offers to promote Australia as a destination for international students. Anecdotal evidence suggests that high quality students utilising the TOEFL test, due to its accessibility and lower cost, will apply to study in the United States and other countries where the TOEFL test scores are accepted rather than take another test to enter Australia.

Other existing evidence supports the view that a competitive market for English proficiency tests will benefit Australia's international education sector. For instance a 2009 AIEC conference presentation by Australian researcher and consultant Alan Olsen (http://www.aiec.idp.com/pdf/2009_Olsen_Thurs_1100_BAUD_B.pdf) referenced a study that identified six reasons why international students did not accept offers of enrolment from Australian institutions. One of the reasons was that when students gained admission based on their TOEFL test scores and were then required to take an additional IELTS test for visa purposes, they did not proceed with their admission in Australia due to the expense and effort and looked to other destinations instead. Unfortunately no similar research has been undertaken regarding skilled migration applicants.

It should be noted also that not all English proficiency tests use the same methodology or scoring to achieve a test result for the applicant. All the tests approved by DIAC for student visas measure the four skills of reading, listening, speaking and writing. One major difference between the TOEFL iBT test and the IELTS test is that the situation never arises where only one person scores an applicant's speaking and writing skills. Multiple assessors, overseen by a Scoring Leader, mark each candidate's speaking and writing tests. This is not done at the test centre but rather by markers who score responses from around the world. Neither is the test centre responsible for collating and distributing test results. These procedures are designed to provide more consistent scores on the four communication skills and avoid personal influences of individuals on a test taker's results.

ETS believes that DIAC's recommendation and the Minister's subsequent approval as a demonstration that the government has confidence that the TOEFL test provides the necessary rigour and security to assess English proficiency to migration purposes. This decision is also an indication that the Government is comfortable in utilising a range of English proficiency testing options to strengthen the reach of its student visa migration programs. In other words the Government has the capacity to use a range of English testing options to ensure its migration programs are secure while also broadening the range of its application base.

2. English Proficiency Requirements for Skilled Migration Visa Applications.

It is worth reminding the Committee that DIAC's process to expand the number of English language tests that are accepted as evidence of English language proficiency applied to student and skilled migration applications. The submissions to these applications by test providers have been evaluated by the department against the same 24 certain benchmarks and criteria. While public statements from the Minister indicate that the Labour Market Branch of DIAC will review implementation of the student visa changes, IELTS still remains the sole English proficiency test for skilled migration purposes.

Extending the Reach of Australia's Skilled Migration Program

ETS contends that the inclusion of the alternative English proficiency tests represents similar benefits to Australia's skilled migration program and it will do the same for its international education sector. The strength of the TOEFL test is in providing a broader range of options to applicants which will support efforts by the Australian education and business sectors to increase and diversify their pool of potential applicants, especially in areas where the TOEFL test is more widely known or more widely available than IELTS. The TOEFL test has a strong presence in some of Australia's largest Skill Stream source countries.

According to DIAC's publication "Population Flows: Immigration Aspects 09-10" outline that in 2009-10 the Skill Stream outcome was 107, 868 places, a decrease of 6,909 (6.0 per cent) on the previous year. Table 1 outlines the source countries of Australia's General Skilled Migration (GSM) demonstrating that the Top 10 Skill Stream source countries for 2006-07 to 2009-10 remained constant with minor variations.

Table 1: Top 10 Skill Stream Source Countries for 2006-07 to 2009-10

Citizenship	2006-07	2007-08	2008-09	2009-10
UNITED KINGDOM	24 800	23 155	23 178	18 487
INDIA	15 865	19 281	20 105	18 042
PEOPLE'S REPUBLIC OF CHINA	14 688	14 924	13 927	14 505
SOUTH AFRICA	4 293	6 556	10 485	9 855
PHILIPPINES	3 182	3 860	5 789	6 832
MALAYSIA	3 838	4 185	4 089	4 277
SRI LANKA	2 606	3 558	3 531	4 049
REPUBLIC OF KOREA	3 105	4 331	3 807	3 150
IRELAND	1 270	1 389	1 799	2 219
IRAN	453	647	1 711	1 640
OTHER	23 822	26 654	26 356	24 812
TOTAL	97 922	108 540	114 777	107 868

Source: Population Flows: Immigration Aspects 2009-2010 Edition: DIAC

<http://www.immi.gov.au/media/publications/statistics/popflows2009-10/pop-flows.pdf>. Accessed 28 July 2011.

By contrast, Table 2 demonstrates the TOEFL tests largest volume countries in 2010.

Table 2 The TOEFL Test's Largest Volume Countries 2010 –

CHINA, PEOPLE'S REPUBLIC OF
UNITED STATES OF AMERICA
KOREA (ROK)
JAPAN
INDIA
GERMANY
CANADA
TURKEY
TAIWAN
FRANCE
IRAN
UNITED ARAB EMIRATES
SAUDI ARABIA
COLOMBIA
BRAZIL
MEXICO
NIGERIA
THAILAND
SPAIN
HONG KONG
ITALY
INDONESIA
EGYPT
RUSSIA
VIETNAM
PHILIPPINES
JORDAN
CHILE
PAKISTAN
SWEDEN

Source: Internal ETS Data

Comparison of Tables 1 and 2 demonstrate that the TOEFL test is well placed to support the reach of the skilled migration program. India, China, Philippines and the Republic of Korea represent over 35 per cent of Australia's top 10 skill stream source countries. As demonstrated by Table 2 the TOEFL test maintains a strong presence in these countries that make up the total GSM program. In light of ETS's presence in these countries, we argue that the TOEFL test can benefit Australia's skilled migration program by extending not only its global reach, but the depth of reach in regions that represent strong skill stream source countries.

It is important to note that ETS is seeking to introduce competition by providing an alternative English Proficiency test for skilled migration applicants. Given the high standards set by DIAC's 24 benchmark assessment process for requirements, we contend that the inclusion of the TOEFL test (and others) provides

the necessary testing reach and efficiency that will strengthen the existing skilled migration program without diminishing its security or integrity. In the context of the Committee's focus on multiculturalism, this can only serve to encourage stronger inclusion of skilled migrants who will benefit from a greater range of testing options to enter into the country.

Visa processing times

Much is said about delays in processing visa applications in Australia compared to other markets. These delays have been, at times, significant. The limited number of approved English language proficiency tests in Australia further exacerbates delays in skilled visa processing as students are often waiting for their English language test scores to complete their application. ETS suggest that the inclusion of the TOEFL test as an alternative test for English language proficiency, with test centres around the world and in Australia, will mitigate delays caused by limited access to approved test centres and support more effective and efficient visa processing times overall. This maintains particular pertinence to measures announced in the Federal Government's budget which aims to halve processing times for 457 visas from the current median of 22 calendar days. Under these measures the Government will provide \$10.0 million over four years to enhance the Temporary Business (Long Stay) (Subclass 457) Visa Program and improve visa processing times. This measure aims to improve visa processing times from around four weeks to around two weeks.¹

International Skilled Migration English Proficiency Models

The Committee may also be interested in how English proficiency requirements for some countries compare to the Australian Model. The UK Border Agency uses a number of English Proficiency tests as part of its skilled migration program. The TOEFL test has a strong record of use in this program. The US Department of Homeland Security does not require English proficiency testing for skilled migration applications. The Canadian skilled migration relies on a number of tests as part of its skilled migration program. New Zealand has the same policy settings as Australia.

We draw this matter to the Committee's attention to demonstrate that there are a range of policy options available for Australia to consider. The point must also be made that these policy settings are structured in the context of a highly competitive global market for skilled labour. Recent Federal Government reforms such as a new General Skilled Migration Points test and the introduction of a Skilled Migrant Selection Model are designed to match skilled labour supply with demand ². However, Australia is competing with other countries that are seeking to attract workers with similar skills. ETS believes that providing a range of English proficiency testing options (on the basis that they meet DIAC's security requirements) would remove a potential disincentive for skilled migration applicants that the Government is targeting.

Balancing English Proficiency Requirements for Student and Skilled Migration Visa Applications

¹ http://www.budget.gov.au/2011-12/content/bp2/html/bp2_expense-14.htm: accessed 28 July 2011.

² <http://www.minister.immi.gov.au/media/cb/2011/cb168339.htm>: accessed 28 July 2011.

While ETS welcomes the TOEFL test's inclusion for student visa purposes, we are concerned that a continuation of different arrangements for skilled migration will discourage applicants to take an alternative test. In our experience students are more likely to remain committed to the one test. Therefore a student entering Australia on a TOEFL test is unlikely to want to choose an IELTS tests once he or she has attained a qualification and wants to apply for a skilled migration visa. Further we believe that by only implementing the TOEFL test for student visa purposes, it will discourage strong candidates educated in Australia to enter into the skilled migration program.

Conclusion

ETS is currently supporting DIAC as it works towards implementing alternative English proficiency tests for student visa purposes. We anticipate that the implementation of alternative English proficiency tests for student visas is likely to occur towards the end of 2011 or early 2012. ETS is also confident that the inclusion of the TOEFL test will not complicate the process for DIAC and skilled migration visa arrangements. This is because many of the required processes for DIAC to use alternative English proficiency tests will be already in place. This includes ensuring effective equivalencies between tests that are currently being established.

ETS looks forward to working with the Government and Department with a view to effective implementation of the TOEFL test for student visa applications and acceptance for skilled migration visa applications.