AAERI Advisory on use of MOI letters as evidence of English Proficiency

Dear Australian Education Providers,

I am doing this communication on behalf of AAERI in my capacity as Head of the Visa Committee.

In recent months, several Australian Education Providers have accepted “Medium of English Instruction” letters from student’s colleges as adequate evidence of English proficiency and have waived the requirement for tests such as IELTS, PTE or TOEFL. Most of such providers have possibly made this waiver to assist their recruitment effort and often under persuasion of market demand.

AAERI is also alerted that there have been instances where this waiver has been exploited by students and those with inadequate English proficiency but from such institutions that have had this privilege have managed to make it to courses and institutions in Australia where they are not able to cope with the study requirements.

Institutions must be aware that Indian Universities are structured differently to Australian Universities. In India there are often large number of colleges under each University and even if the University follows a certain set curriculum, it is impossible to assure on the level of English proficiency for all students studying in one particular University. The entry into these Universities don’t have rigid requirements to ensure the level of English proficiency too and it is possible that they will admit students from non-English background.

- This has been a talking point across the globe and UK NARIC has launched a process of allocated a quality mark. I quote below from a recent communication from NARIC while launching EMI Quality Mark:

**UK NARIC launches the EMI Quality Mark: The world’s first quality rating scheme for Higher Education providers offering English Medium Instruction (EMI) degree programmes.**

*Recent years have seen rapid growth in EMI, or English Medium Instruction; ‘the use of English language to teach academic subjects (other than English itself) in countries or jurisdictions where the first language of the majority of the population is not English’ (Dearden, 2015).*
EMI is seen by many higher education institutions as a means to internationalise and to attract further students in an increasingly competitive environment. Yet the use of EMI within an institution, faculty, department or centre is not a guarantee of quality: there are no agreed guidelines for internationalisation nor a framework for implementing EMI programmes. EMI academics are teaching progressively more multilingual and multicultural groups of students through what is a second language for most. Moreover whilst studying a degree through the medium of English may be seen to bring a double benefit (subject knowledge and English language skills); the outcomes for students are not always clear since “there is little research into the impact of EMI on how much English students learn…” (Galloway, 2017).

This can make it difficult for prospective students and academic partners to make an informed decision when choosing an institution. It is equally difficult for institutions and faculties delivering EMI to accurately assess their performance and strive for continual improvement without a clear benchmark.

The EMI Quality Mark is designed to address these issues, identifying quality teaching and learning, positive academic and linguistic outcomes for students, as well as good practice in institutional management of EMI, admissions and student support.

Under the scheme, higher education faculties or institutions anywhere in the world offering EMI programmes can apply to UK NARIC for independent evaluation of their EMI provision in four main areas: context and management; teaching and learning; admissions and student support; and assessment and student outcomes.

Providers will be rated as Gold, Silver, Bronze or Developing, based on independent and rigorous evaluation with clear, evidenced-based scoring. The findings of the evaluation can be used to support providers in promoting their EMI provision to prospective students and to inform further development if needed.

Those achieving the Gold, Silver or Bronze EMI Quality Mark will receive a comprehensive evaluation report across all the quality areas, highlighting key points of strength and opportunities for improvement, as appropriate. Additionally they will receive a Quality EMI Provider Certificate, Executive Summary report and use of the EMI Quality Mark logo[1][1]; there will also be an entry included on UK NARIC’s published list of quality EMI providers.

For institutions or faculties rated as ‘Developing’, a detailed development report will be presented. This will show clearly any areas for improvement and specific guidance on any work that needs to be done to achieve a Bronze level award or above.
UK NARIC is delighted to partner with Oxford EMI to bring this important new quality evaluation scheme to the sector. Oxford EMI is a training and consultancy organisation headed by Julie Dearden, former senior research fellow in EMI at the Department of Education, University of Oxford and author of a key report on the growth of EMI for the British Council, English as a Medium of Instruction: a Growing Global Phenomenon (2015) which is an overview of EMI in 55 countries. Oxford EMI has experience of working with hundreds of academics, managers and staff at universities in Asia, Africa, Europe and South America, enabling them to face the pedagogical and managerial challenges of internationalisation. Detailed information, a scheme handbook and the opportunity to make enquiries or begin an application for the scheme, can be found at www.naric.org.uk/EMI

- At the recently held AAERI Convention 2018, Mr Oliver Fortescue, President & Chair of AUIDF (Australian Universities International Directors Forum) too highlighted to an audience of members of various Universities, their agents and also senior officers of various Australian Government Departments. In his keynote address, he shared that the standardised approach on streamlining has an issue pertaining to institutions sometimes resorting to waiving English requirements. I share the one slide from that presentation here:

### Australian Simplified Student Visa Framework (SSVF)

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<tr>
<th>Education Provider Immigration Risk</th>
<th>Country Immigration Risk</th>
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<tbody>
<tr>
<td>One</td>
<td>S S S</td>
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<td>Two</td>
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<td>Three</td>
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- **S** - Streamlined evidentiary requirements (Documentary evidence of English and financial capacity not generally required)
- **R** - Regular evidentiary requirements (Documentary evidence of English and financial capacity generally required)
• During the event, I raised the issue with Department of Home Affairs too and they will be taking a closer look into the regulations in place.

As AAERI, we recommend that Australian Education Providers despite their country immigration risk level must ensure that the waiver to English Tests is only applied in exceptional circumstances. AAERI recommends that the Universities review their current requirements and if they have been according waivers, they may consider withdrawing the same.

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