



Quality Beyond Measure.

Committee Secretary
House of Representatives Standing Committee on Health and Ageing
PO Box 6021
Parliament House
Canberra ACT 2600
Australia

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Sent via Email: haa.reps@aph.gov.au

Dear Sir/Madam:

SUBMISSION FROM EDUCATIONAL TESTING SERVICE

Thank you for the opportunity to make a submission to the House of Representatives Standing Committee on Health and Ageing Inquiry into registration processes and support for Overseas Trained Doctors.

Educational Testing Service (ETS) understands that the Committee has taken specific interest in the English Language proficiency testing component of the registration process of overseas trained doctors to Australia. As a global non-profit educational assessment and research organisation and the largest of its kind, ETS is well placed to share insights into English proficiency testing arrangements and as such will restrict the scope of this submission to:

- An overview of ETS and its Test of English as a Foreign Language (TOEFL test); and
- An overview of the Australian Medical Board's English proficiency requirements and the current Student and Skilled Migration visa arrangements as they relate to English proficiency testing arrangements.
- Provide relevant examples of recognition of the TOEFL test internationally.

ETS welcomes the opportunity to contribute to the Committee's inquiry as language proficiency plays a critical role in safeguarding the health and wellbeing of the public. ETS has long understood the seriousness of English proficiency for medical needs, and has a long history of assisting health associations set standards for the TOEFL test that meet their needs.

The TOEFL test is not currently recognised by the Australian Medical Board for the purposes of registering Overseas Trained Doctors. This situation exists with other professional regulatory authorities primarily because DIAC has had limitations on its recognition of English proficiency tests for skilled migration programs. The recent recognition of the TOEFL test for student visa purposes after meeting 24 benchmarks of quality now leads the way for anticipated recognition of the test for skilled migration purposes. Upon receiving recognition, ETS will offer the same high quality standard setting process to Australian health professions that has distinguished it other countries where the TOEFL test is trusted by a wide range of health professions.

The TOEFL test is the most widely accepted English-language test in the world, recognised by more than 8,000 colleges, universities and government agencies in more than 130 countries. The TOEFL test offers the following key features:

- **Long history in meeting the needs of health professions** –TOEFL test results are recognised by professional bodies for doctors, nurses, pharmacists, veterinarians, occupational therapists and physical therapists to ensure practitioners have the necessary proficiency to communicate effectively with patients, families and colleagues.
- **Most widely available** - The TOEFL test is administered at more than 4500 test sites around the world, making it the most prevalent test available;
- **Highest stands of psychometric quality** - The TOEFL test is a highly reliable measure of English-language proficiency and is built to the highest standards of measurement;
- **Test integrity** -Score integrity is of the highest concern to ETS and security is an integral part of the TOEFL test from test development through the reporting of results;
- **Unparalleled research** - The TOEFL test is based on more than 40 years of world-class, rigorous, scholarly research conducted by both ETS staff and renowned external researchers; and

- **Unmatched standards of scoring** - The TOEFL test has the most objective and reliable scoring methods that combine both human and automated scoring, leading to results of the highest quality.

In the New Year we will be approaching the Department of Health and Aging along with the relevant medical boards so they may consider the addition of the TOEFL test to the English Language Skills Registration Standard.

Our key contact in Australia is Helen Cook, Associate Director, Client Relations, Australasia. Helen can be contacted on 0408 078 052 or at hcook@ets.org if you or your team have any questions regarding the statements made in our submission or for further information.

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. ETS and the TOEFL Test

Educational Testing Service (ETS) is the world's largest non-profit educational assessment and research organisation. 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® and TOEIC® tests, the GRE® General and Subject Tests and *The Praxis Series*™ assessments — in more than 180 countries, at more than 9,000 locations worldwide.

In addition to assessments, ETS conducts educational research, analysis and policy studies and develops a variety of customised services and products for teacher certification, English language learning and elementary, secondary and post-secondary education.

ETS serves individual test takers, their families, educational institutions and government agencies. More than 2,800 employees work at ETS's offices around the world. Of these, more than 1,100 professional staff members have training and expertise in education, psychology, statistics, psychometrics, computer sciences, sociology and the humanities. Six hundred have advanced degrees, and 250 hold doctorates. Today, ETS experts in research and assessment help individuals, educators and government agencies around the world find new ways to advance learning through customised, innovative assessment solutions.

TOEFL Test Overview

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

The TOEFL test began in 1964 and has undergone numerous major revisions since that time. In 2005 the TOEFL internet-based version of the test was introduced, known as TOEFL iBT. Today more than 96% of all TOEFL testing is internet-based. For the purposes of this paper, "TOEFL" refers to the TOEFL iBT test. The TOEFL test measures the four core English skills needed to communicate effectively (reading,

writing, speaking and listening). Test takers are asked to perform tasks that combine more than one skill, such as:

- Read, listen and then speak in response to a question
- Listen and then speak in response to a question
- Read, listen and then write in response to a question

Test takers combine skills and formulate responses to summarise, evaluate, compare and synthesise information. These innovative integrated tasks measure how well an individual can use English for communication, and make the TOEFL test the most comprehensive English-language proficiency test in the market.

The TOEFL test was developed in cooperation with many of the world's leading experts in language testing, including Australian academics such as Professor Tim McNamara of the University of Melbourne. More than 150 research reports and over 40 years of ongoing research support the design and validity of the TOEFL test. More information about the extensive TOEFL research program is available at <http://www.ets.org/toefl/research>.

Duration and structure of the test

Test takers are allowed up to four hours to complete the test. All four sections are administered on the same day to enhance security and offer convenience to test takers.

Table 1: TOEFL test structure

Section	Time Limit	Questions	Tasks
Reading	60–80 minutes	36–56 questions	Read 3 or 4 passages from academic texts and answer questions.
Listening	60–90 minutes	34–51 questions	Listen to lectures, classroom discussions and conversations, and then answer questions.
Break	10 minutes	—	—
Speaking	20 minutes	6 tasks	Speak in response to reading and listening material; express an opinion on a familiar topic.
Writing	50 minutes	2 tasks	Write essay responses based on reading and listening tasks; support an opinion in writing.

Test Centre Locations

The TOEFL test is the most widely available English proficiency test in the world, and individuals may register to test at any of the 4500 test centres in 165 countries. The test is offered on fixed dates at secure, ETS-approved test centres approximately two to three times per month. A list of TOEFL test sites and test dates currently available can be found at:

http://www.ets.org/Media/Tests/TOEFL/tclists/IBT_a.html

Registration and Fees

The TOEFL program offers three methods of registration: online, via phone or by post. Fees vary by location. In Australia, the TOEFL test costs US \$240, approximately \$100 less than the IELTS test.

Developing Fair and Reliable Test Questions

As a not for profit research and assessment organization, ETS is committed to ensuring that the TOEFL test is of the highest quality and is as free of bias as possible. ETS has exacting standards for the creation of test questions to ensure that they do not reinforce stereotypical views of any group and are free of racial, ethnic, gender, socioeconomic and other forms of bias. After questions are created

according to exacting standards they undergo rigorous formal reviews to ensure that they adhere to ETS fairness guidelines, which are set forth in seven publications. ETS fairness guidelines and supporting publications can be found at <http://www.ets.org/about/fairness/>

Two videos outline the process of test development and the steps ETS takes to ensure fairness and equity. They may be viewed at:

http://www.ets.org/s/toefl/flash/16919_fairness.html

http://www.ets.org/understanding_testing/test_development/quality_fairness/

TOEFL Score Scales

TOEFL test takers receive four scores and a total score. The following are the score ranges for each communication skill. Scores for individual skills are added to achieve the total score.

Table 2. TOEFL Score Scales

Skill	Score Range
Reading	0–30
Listening	0–30
Speaking	0–30
Writing	0–30
Total Score	0–120

TOEFL scores are valid for 2 years.

In addition to receiving scores on the certificate, test takers receive feedback on their performance and suggestions for language improvement.

Reporting TOEFL Test Results

Test results are posted online to test takers 10 days after the test. Once available to test takers, TOEFL results are also available for online verification. Additional time must be allowed for mail to be received by test takers who have opted into receiving the print copy on secure paper, which incorporates security features such as heat-sensitive ink for score report authenticity. These features are described below.

TOEFL Marking Overview

Marking is one of the distinguishing hallmarks of the TOEFL test and its processes are unparalleled.

Balanced Use of Human and Automated Marking

ETS uses both human raters and automated scoring methods to provide a complete and accurate picture of a test taker's ability. While automated-only scoring models have advantages, no automated scoring engine can measure the effectiveness of the language response and the appropriateness of its content at the level of sophistication and complexity required for the TOEFL test. Human markers are needed to attend to a wider variety of features, such as the quality of ideas and content as well as form.

The TOEFL test uses automated scoring to complement human scoring for the two tasks in the Writing section. Combining human judgment for content and meaning, and automated scoring for linguistic features such as grammar, vocabulary and structure, ensures consistent, quality scores.

Test Marking is Kept Separate from Test Administration

To ensure the security and integrity of scores, as well as to provide the highest level of measurement, it is critical that scoring not take place at test sites, but rather through a centralized scoring network that implements and ensures consistent scoring standards. The TOEFL test is scored by a network of markers, and the process is carefully controlled from a secure central location so there is no chance the marker knows the test taker. Individual scorers assess speaking and writing responses from around the world. ETS uses a highly diverse pool of markers rather than those exclusive to an applicant's country of origin. Responses are scored anonymously for truly objective marking.

Extensive Training and Daily Monitoring of Markers

ETS human raters are trained extensively, must pass a certification test, and after certification are calibrated daily. The calibration includes task familiarization, guidance on scoring the task, and practice on a range of responses. Markers are continuously monitored in real-time for accuracy by scoring leaders who are in turn overseen by ETS staff. When markers move from one question to another or take a break they must calibrate again.

Use of Multiple Markers to Enhance Reliability

Unlike other tests that use a single marker, for the TOEFL test multiple raters' judgments contribute to each test taker's Speaking and Writing results. In the Speaking section, three to six different individuals provide input into the score, while for Writing, there are two inputs for each of the two writing tasks. Use of multiple markers increases score reliability and ensures the highest quality measurement.

Test Taker Results are not Kept at the Test Centre

Just as all marking is separated from the test centre, no test results are maintained at the centre. All records are held at ETS in Princeton, New Jersey, so there is no possibility of subsequent tampering of test results at the test centre.

Comparing TOEFL and IELTS Scores

One of the DIAC requirements for recognition of alternative English proficiency tests for student visas was to provide comparable scores to IELTS scores already set in legislation. In order to provide objective, data-based evidence of score comparability, ETS conducted score comparison research between the TOEFL test and the IELTS academic module. For the research, ETS obtained a sample of 1,153 students who had both IELTS and TOEFL scores. Under this approach, TOEFL iBT score ranges are identified for test takers meeting a particular score level on the equivalent IELTS score band. The results are given below. The complete report is available at

http://www.ets.org/s/toefl/pdf/linking_toefl_ibt_scores_to_ielts_scores.pdf and in Appendix A.

Table 3. Comparing TOEFL and IELTS Scores

IELTS Academic Band Score	TOEFL iBT Score
4	28
4.5	32
5	35
5.5	46
6	60
6.5	79
7	94
7.5	102
8	110
8.5	115

Blue shading indicates score comparison ranges with the highest degree of confidence. Research-based comparisons of TOEFL and IELTS are also available for each communication skill.

Test Security and Validity Checking

ETS has various procedures in place to prevent testing and scoring fraud. These can be seen from the test design right through to the score reporting process.

Using the highest standards to create test content

Prevention methods start with the design of the TOEFL test. ETS creates thousands of new test questions each year to ensure that the items are fresh and to reduce the risk of memorisation and cheating. Integrated test questions also support test security as they are not amenable to coaching or memorization. Test takers must understand specific materials presented and summarise, evaluate, compare and synthesise the information in their spoken or written response.

Establishing secure test centres

Test administrations occur at Certified Test Administration Sites (CTAS). Each CTAS undergoes a rigorous process through ETS to ensure testing security.

- ETS uses the same Internet security protocols as those used by major financial institutions for their secure transmissions. The communication channel uses state-of-the-art encryption, and our software is able to detect whether a transmission was altered or disrupted.
- Test content that is downloaded to a test centre computer is encrypted and cannot be accessed until the actual test administration.
- Internet delivery ensures that no one can access test questions prior to the actual administration.

At the beginning of each test administration, the test software automatically closes all non-TOEFL windows or applications, including instant messaging (IM). It closes any applications that try to open during the test and then automatically logs the incident. The software also locks the desktop, suppressing key combinations so the test taker cannot switch to any other task.

Ensuring the training of test centre administrators

Test centre staff members are thoroughly trained by ETS personnel to prepare for managing test administrations. As such, test centre staff members are required to pass a certification exam to demonstrate their knowledge of test delivery policy, practices and procedures before they can serve as a Test Centre Administrator. ETS provides a *Policies, Practices and Procedures Manual* to test centre supervisors, featuring proprietary information from ETS. All policies and procedures in the Manual must be followed.

ETS also conducts announced, unannounced and undeclared visits to test sites to observe and ensure that the highest standard is being applied to testing environments around the world.

Instituting and enforcing test-taker rules and requirements

On the day of the test, test takers have to go through several security requirements in order to test, including:

- Showing ETS-approved forms of identification that contain a photograph and signature;
- Providing handwriting and signature samples;
- Taking digital photos at the center and embedding those images into the paper score reports
- Passing through security wand and ID with electronic chip (select locations); and
- Monitoring with video cameras, submitting a thumb scan and submitting to metal detector scans (select locations).

After checking into the test centre, test takers:

- Are prohibited from bringing items into the test centre that could be used as a testing aid or to collect, share or collaborate on test content;
- Have no access to personal items such as books, electronic devices, handbags and backpacks, all of which are stored separately from the test takers to maintain security;
- Must have their identity verified by the test centre administrator using the digital photo taken at check-in before starting the test; and
- Must present their identification to the test centre administrator and have their identity verified using the digital photo taken at check-in upon returning from break.

Printed TOEFL Score Results

Another way ETS ensures the integrity of scores is through the security measures implemented for the paper score reports. There are two types of TOEFL score reports issued on paper:

- The Official score report, which is sent directly from ETS to the institutions or agencies designated by the test taker. Prior to test day, test takers can select up to four score recipients at no charge. They can also order additional score reports later for a nominal fee; and
- The Examinee score report, which is sent from ETS to test takers who request it.

Official score reports are printed on purple security paper; examinee score reports are on green paper. In January 2011, ETS began using a more secure paper for TOEFL score reports, including the following features:

- The security paper is Appleton DocuCheck® Watermark with TonerFuse 2. It contains a chain-link watermark on the back of the paper, which is visible when held at a 45-degree angle. This is the easiest, most obvious method of verifying the authenticity of an official score report;
- There is a Full Chemical Sensitive VOID on the face of the paper. The word “VOID” is continuously repeated on an angle throughout the entire face of the document. “VOID” is produced in multiple languages when activated by a bleach, hypochloride or ink eradicator;
- In addition, TOEFL score reports now include the words “ETS® Security Guard” in the upper right-hand corner, printed with a special heat-sensitive ink for security. To activate this security feature, recipients can apply heat to the text, either by rubbing it or blowing on it and the ETS Security Guard text will disappear. This feature will not work if the score report has been photocopied;
- There is a Laser Lock on the face of the paper. This makes it difficult to remove toner from laser- or ion-printed documents; and
- There are also laid lines on the back of the paper. Evenly spaced lines in a specially formulated grey ink, these laid lines make alteration by cutting and pasting difficult.

Copies of each of the score reports can be found in Appendix B.

Detection

ETS closely monitors all test centres and tracks all security incidents. If it is determined that a test centre does not meet ETS standards and it fails to correct the issue, it is closed. ETS also conducts random

inspection of test centres as well as site visits to centres where concerns have been raised through supervisor reports, tips or test-taker complaints. ETS works with national law enforcement agencies to prosecute professional impersonation rings.

Monitoring Score Statistics

Statistical analysis methods are used to help detect possible cases of cheating. The ETS Statistical Analysis team monitors score trends by test centre, country and region to detect cheating.

- Large score differences software is used to detect significant changes in scores for repeat test takers.
- System-generated irregularity reports are reviewed after each administration.
- Site historical performance data is maintained to identify any deficiencies that need to be addressed.
- Sites are subject to quality audits and third-party observations.

When ETS has reason to suspect cheating may have taken place, a security review is conducted that can include photograph review, speech analysis, handwriting analysis and score analysis.

Communication

ETS works very closely with the institutions and professional bodies we serve around the world. ETS informs score users that have been designated as score recipients when scores have been cancelled. In addition, any concern regarding test results can be reported by the institution and will be investigated.

Online Score Verification and Speech Sample

The TOEFL Program offers an online score verification service free of charge to all users of scores. Each individual who will access the system is issued a unique user name and password by ETS for security.

In addition, score users may listen to a sample of the test taker's spoken response during the test. The speech sample is not a personal introduction which can be easily memorised in advance and thus given an incorrect indication of ability. Instead, the speech sample is a scored response to one of the four most challenging questions in the Speaking section, the integrated test questions.

2. Australian Medical Board Requirements, Australian Migration Settings for English Proficiency and Use of the TOEFL test in Health-Related Fields

Under the Australian Migration Regulations 1994, applicants seeking to attain a range of student and skilled migration visas are required to take an English language proficiency test. Currently only IELTS and the Occupational English Test (OET) may be used to demonstrate English proficiency for the purpose of skilled migration.

The TOEFL test has a long history of serving the needs of the medical community. The test is recognised by Canadian provincial/territorial medical regulatory authorities and in the US, the test is recognised by the National Council of State Boards of Nursing, the Federation of State Boards of Physical Therapy, the National Board for Certification in Physical Therapy, the Educational Commission for Foreign Veterinary Graduates, the National Council of State Boards of Nursing, the National Association of Boards of Pharmacy, and the Council for Graduates of Foreign Nursing Schools. The test is also recognised by state-based accreditation/regulatory bodies. The TOEFL Program works with professional bodies to conduct standard setting studies that ensure each association identifies the level of English proficiency necessary to successful communication in English for their professional duties.

As of 5 November 2011, the Government accepted TOEFL as an alternative English proficiency test for student visa purposes. It is anticipated that after a period of review of the student visa program the TOEFL test will also be recognised for skilled migration visas.

Conclusion

ETS believes that DIAC's recommendation and the Minister's subsequent approval of the TOEFL test for student visa purposes is a demonstration that the government has confidence in the TOEFL test. After a period of review of the implementation of alternative English proficiency tests for student visa purposes it is anticipated that the TOEFL test will also be recognised for the purpose of skilled migration visas. This acceptance will provide an opportunity for Australian health professions to consider alternative English tests for their own use. The TOEFL test has long been a part of the certification and licensing of health professionals globally. The test is extensively researched and constantly monitored to ensure quality. The TOEFL Program is committed to conducting standard setting studies with health

associations to ensure test scores match their level of proficiency needs and stands ready to offer the same service for Australian health associations.

ETS is confident that the recognition of the TOEFL test for skilled migration purposes will allow health associations to offer choice in English proficiency testing while continuing to safeguard the wellbeing and safety of Australian patients and their families.