

To: AHPRA – Public Consultation – Review Committee: December 2013;
Section; English Language Skills Standards

From: Mrs [REDACTED] EEN Registration Applicant in October 2013, and
[REDACTED]

Subject: Existing and Alternative Pathways to Determine English Language
Skills Standards for Registration with AHPRA.

Dear Members of the Review Committee,

My submission to you is based on the following

- my recent attempt and circumstances to gain AHPRA registration,
- consultation with my Husband who has extensive work experience in dealing with skills recognition in Queensland Government.

In order to gain your attention early, we would like to lay out our proposed alternative 'Pathways' for AHPRA to consider in gaining suitable English Language Skills Standard,

1] For Applicants who have not completed their Education in Australia to HSC level:
including Australians, overseas migrants etc.

- Existing policy OET & IELTS testing standard,
- More flexible where 4 modules exist, and a re-sit of failed modules only done.

2] For Applicants who come from a Country of origin where English Language is compulsory,

- Recognised Prior Learning (RPL); evaluation of their English subject results achieved in their Country of Origin, proof years and standards achieved, equivalents assessments, contribution of that RPL towards meeting all or part of the AHPRA standard required.

3] For Applicants who come from a Country of origin where;

(a) English Language is 'Compulsory',

and,

(b) completed a relevant qualification in an Australian Education institution applicable to their registration application with AHPRA i.e. EEN, RN, Psychology etc

- Recognised Prior Learning (RPL); evaluation of their English subject results achieved in their Country of Origin, proof years and standards achieved, equivalents assessments, contribution of that RPL towards meeting all or part of the AHPRA standard required.
- Include assessment of the four (4) areas of English language standard required in the Education Institution course evaluation. Add Australian Qualification Framework English Standards.

EVALUATION and STRUCTURAL DETAIL of ALTERNATIVE PATHWAYS PROPOSED

For [1] above; This maintains the current policy standards of AHPRA with regard English language skills. There being no prior exposure to academic English language teachings or proof of same then a complete and comprehensive assessment should apply.

Split the test into 4 distinctive modules, resit those modules not achieved.

For [2] above: RPL of English language academic teachings. So here I will give my background example and, documents I actually supplied to AHPRA in having them gain insight into my Academic English standard that I had prior to entering Australia.

- I come from Philippines where English is a compulsory subject since USA intervention some years after WW2 with a curriculum based American standard,
- I completed 6 years in Primary; compulsory English, I could not supply my academic transcripts due to records being lost in Provincial floods. However, this is a confirmable standard in Philippines Primary Schools.
- I completed 4 years at High School where my Academic records for English show and average of over 80%; certified copy provided to AHPRA
- I completed a 4 year Bachelor of Science Degree in Psychology (compulsory English subject and all completed in English) where my Academic records for English show and average of over 80%; certified copy provided to AHPRA.

So I had completed 14 years academic exposure to English as a Subject where 4 years were to complete a Higher Education Degree all in the English language. Further;

- My Bachelor of Psychology Degree was sent to Overseas Qualification Assessment - Skills Recognition Training Services. The outcome assessment was an equivalent Australian Education Standard; AQF Advance Diploma. Certified copy sent to AHPRA with my Registration Application.
- I have worked in Australia in Aged care for some 5.5 years and a letter from my Employer of same time stated that they were more than happy with my English language skills and communications at all level. Certified copy sent to AHPRA with my Registration Application.

For [3](b) above: completed a relevant qualification in an Australian Education institution applicable to their registration application with AHPRA i.e. EEN, RN, Psychology etc.. Again I will go with my example which I know applies to a lot of Registration Applicants.

- I successfully completed 2 years EEN distance learning studies with [REDACTED] Institute of TAFE where my written language skills were paramount in achieving a pass result.
- I attended 3 weeks of Residential School interactions in the 2 years with [REDACTED]

- I completed 420 hours placement training in supervised and directed training in Hospital and Aged care facilities where assessments were done on my training.

The most valid points with regard my Australia Institution Training for EEN is the opportunity for AHPRA to gain the absolute 'best practice' to gain Applicants English Language Skills standard. What better way to

- Have actual teachers rate written and spoken submissions in English language proficiency for students to an AHPRA Registration standard where;
 - Written subjects material; subjects and matter are immensely considerable, hundreds of pages and thousands of hours in English composition, grammar, interpretation and comprehension. The IELTS is only some 2.5 hours.
 - Early assessment can save a student from academic, and Registration failure, in English language skills,
 - Early identification or weaknesses in English languages skills can be identified and recommendations made,
 - English language subjects can be included / incorporated in their Institutional Education Course and placed in the AQF register
 - Adopt this method to increase skilled outcomes, registrations and increase educational productivity.
- Have actual placement Assessors (for me 420 hours) observe and score English language skills in the work environment where,
 - Actual workplace interactions with patients, residents and staff are taking place over a considerable timeframe. (IELTS is 20 minutes non specific)
 - Assessors are already responsibly observing and rating placement students in a number of subject matters; add English skills interactions.
 - My experience is that I had some 7 different training assessors, a sound scope for varied observation and opinion with regard my English language skill level
 - These assessments would be conducted in environments desirable and directly related to AHPRA standards; medical, aged care, calculations, written notes and reports etc..
- Exceeds yet maintains AHPRA Policy ideology in that training is being done in Australian medical and Education environments rather than those on the 'preferred' Country of origin list who can apply for an exemption.

EXECUTIVE SUMMARY:

Having considered pathway as per **[2]** above maintains onus on applicants to supply sufficient proof of English language teachings. RPL frameworks are available from both TAFE and from the Overseas Skills Recognition Service and would again be the responsibility of the applicant to gain the assessment.

With regard having the pathway **[2]** combined with pathway **[3](a)+(b)**, the educational English language assessment standard certainty AHPRA would achieve over the IELTS & OET standards would be considerable. The current methodology lends itself to;

- AHPRA Registration failures after academic achievements by applicants,
- Very narrow scope / limited margins of assessment in terms of time and material evaluations after academic achievements by applicants
- No early indicators nor opportunities for students / Applicants to correct English language deficiencies before testing,
- Potential for considerable costs to accumulate for Applicants in trying to achieve registration standard after academic achievements by applicants,
- Not incorporated into the Australian Qualification Framework where Australian standards have been established over considerable time.

The advantages of having **[2] RPL** and **[3](a)+(b)** completed a relevant qualification in an Australian over IELTS & OET are;

- Significantly Increased English language assessment timeframe,
 - In workplace training environment,
 - In academic teacher interactions
- Early interventions in English language skills deficiencies for potential AHPRA Applicants
 - In workplace interactions assessments
 - In Educational institution assessments
- Higher standard of assessment for AHPRA in actual subject matter and environments
- Potential to reduced burden of costs to potential AHPRA Applicants
- Potential to increased Registrations for AHPRA
- Much more conducive and flexible approach by AHPRA for applicants
- Education friendly, flexible and increased standard and productivity,

PERSONAL CONCLUSION

I had many other experiences in attempting to gain my registration with AHPRA

- CQ University entry only required 6.5 score-band for academic entry, lower than AHPRA registration.
- I had read the Cambridge University submission letter of 2011 to AHPRA where as they said that their IELTS test in NOT conducive to being broken into 4 modules; is a single test. My test at CQU Rockhampton in November 2013; my speaking was done on the Friday, the other components done on a Saturday. ?
- The 'list' cost of IELTS was for me \$330, the 'actual' cost for me was that I had lost 2 hours on the Friday (speaking component), and lost my Saturday shift at penalty rates, the ACTUAL cost for me was near \$700. Their is no flexibility in test times, it is commercially motivated and not user friendly. If or when I do the test again, the real cost will be the same \$700.
- I had supplied my education certified standards as outline above only to be told 'point blank' by AHPRA staff member that do not even consider applying for exemption, "your not on the preferred list of origin Countries", so no flex-ability what-so-ever, policy hard.

- I have talked with people who are past their 10th IELTS test in [REDACTED] still failed, yes \$3,300 list price, their actual cost and loss of productivity is / should be a concern to AHPRA,
- Likewise, some sat 6 times, some 5, many achieving a 7 at any given test in a particular component, and like me, very test intensive and environmentally not conducive to 'normal' workplace conditions.
- My workplace peers were stunned that I did not pass, however, I was not, given what I had learned from students who already sat the IELTS and failed. My explanation to my peers was that the level and content of academic application in the test is in no way related to my workplace English skills environment. Further, the test was very mechanical in nature, very different to my expectations.
- Many people whom I talked to also had a notion that failure, even though always so close to a pass, meant more money for IELTS. So a commercial overtone was there and I ended up feeling same given my past English performances.

[REDACTED]

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