

Australian Health Practitioner Regulation Agency (AHPRA)

Public consultation: Review of *Criminal history registration standard and English language skills registration standard*

Public consultation dated 25 October 2013

Response to: **Review of English language skills registration standard**

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Review of English language skills registration standard: response from the Occupational English Test (OET)

The Occupational English Test (OET) welcomes this opportunity to provide feedback on the proposed changes to the English language skills registration standard. In particular, we wish to comment on the proposal to accept results from more than one test sitting (Questions 4 and 5 in the consultation document), this being the area in which we are best placed to comment.

In brief, it is the position of OET that, while test results from one sitting provide the most valid and reliable indication of applicants' abilities, test results from more than one sitting can be accepted under certain circumstances which would provide flexibility for applicants while maintaining an appropriate focus on public safety. The OET position is explained more fully below.

Test validity and reliability

Results for the four language skills are most valid and reliable when obtained in one test sitting, as this provides an overall determination of a person's language abilities at a particular point in time. Health practitioners do not use any of the four skills individually in isolation from the others, and testing those language skills together reflects this.

Taking the four sub-tests together helps ensure that an applicant is maintaining all four skills, and that all four results reflect the applicant's current abilities. Research shows that language abilities can be maintained for about a year, after which there is a significant rate of attrition, and this especially so for higher initial proficiency individuals such as those seeking registration for the health professions. It should also be noted that this research relates to people who have shown evidence of continued language tuition.

Given the high stakes nature of registration, experience shows that applicants can and will try to "beat the system". They can intensively focus on one skill while preparing to sit the test for that skill, and then allow that skill to deteriorate while they move on to preparing for the next skill. Together with the passage of time, this means that by the time a person has obtained their result for the fourth skill, the result for the first skill may no longer reflect their ability, or their abilities are beginning to attrite, which makes the results less valid. Thus, all

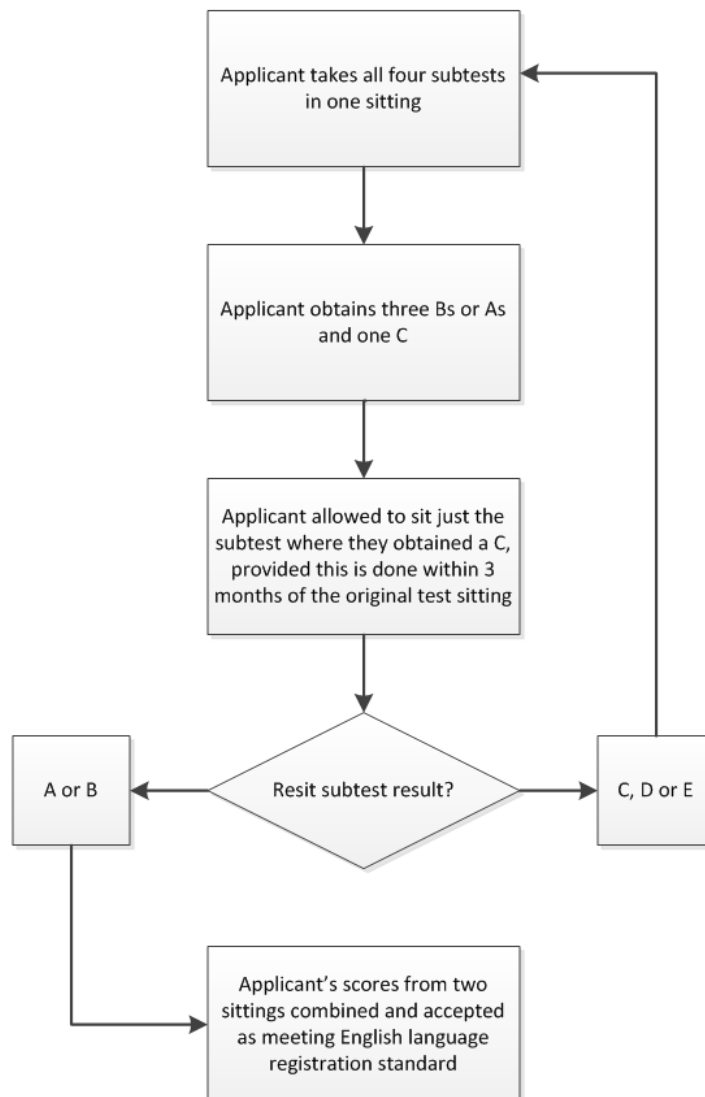
things being equal, results from a single test sitting are to be recommended. Failing that, different test sittings need to be as close in time to one another as possible.

Test fairness

However, OET also recognizes that a testing regime needs to account appropriately for fairness as well as reliability. It is recognized that the results of any test contain an amount of measurement error, and that a test taker who is close to the borderline may fall on the wrong side of that line simply as a result of such error. It may be less than fair to require test takers who have fallen short by a small margin on just one component to resit a whole test.

A feasible approach to the proposed revised standard

With all of the above in mind, should AHPRA and the National Boards choose to proceed with the proposed revised standard, OET suggests the following approach as being most consistent with the demands of test validity, reliability and fairness while maintaining an appropriate focus on public safety:



1. An applicant should **in the first instance take all four sub-tests in one sitting**. This allows a determination to be made about their English language ability across skills at a particular point in time.
2. Allow an applicant who falls just short of the standard (i.e. obtains a C grade) on **one sub-test only** to resit just that sub-test. This will reduce the burden on the individual applicant. Where an applicant falls short on more than one sub-test, this is more likely to be because the applicant does not in fact meet the standard rather than because of measurement error. In such cases, a partial resit is not recommended, because measurement error may be what makes applicants appear to meet the standard, where in fact they do not. This would compromise public safety.
3. The applicant should resit the sub-test where they obtained a C grade **within 3 months** of the original sitting. While the research indicates that language ability can be retained without significant loss for about a year, this has been under conditions which cannot be assumed for AHPRA registrants. That being the case, a more conservative time frame between test sittings is recommended. This helps to ensure that the results being combined are a true and current reflection of the applicant's ability at a particular point in time, and that they are more likely to still be at that ability level when they begin practising. It also helps prevent applicants trying to "beat the system" by retaking the test multiple times and selecting the result which is best for them, but not most representative of their ability level.
4. In the case where the applicant obtains **an A or B grade on the resit**, the inference can be made that the original C grade was the result of measurement error or temporary performance factors on the day of the test, and that the applicant **meets the registration standard**. The Boards can then choose to accept a combination of results from the two sittings.
5. In the case where the applicant obtains **a C, D or E grade on the resit**, the inference can be made that the applicant currently **does not meet the registration standard**. The applicant should therefore be encouraged to continue developing their language skills. After that has happened, the applicant should **take the four tests again in one sitting**, so that a determination of their language skills at that point can be made.

Implementing possible changes

OET is willing to work with AHPRA and the National Boards to implement the approach outlined above. However, modifications to OET administration and security procedures would need to be made to support widespread modular administration at this time.

OET currently has a program of planned research and development aimed at reviewing and improving all aspects of the test. In view of this, OET envisages any changes to the test and its administration being introduced uniformly, not earlier than January 2016, and subject to confirmation by January 2015 that OET's own consultation with stakeholders has been fully completed.

OET welcomes any contribution that AHPRA and the National Boards might make to inform this development work.

Responses to other Questions for consideration from the consultation document

The above is OET's response to Questions for consideration 4 and 5, those being the areas in which we are best placed to provide feedback.

In respect of Question 7, we request the following change to item 4b of the draft revised registration standard:

Current wording: ... *the OET with an overall pass and grades A or B only in each of the four components.*

OET proposed wording: delete ~~an overall pass and~~

The reason for the proposed change of wording is that OET reports a grade for each component and does not currently award an overall pass.

As requested by AHPRA, the table below gives the per country candidate success rate in achieving four B grades in one sitting, OET 2012:

Country of origin	% of candidates who achieved '4 in 1'	Total candidates
United States	100.00%	8
Canada	83.33%	6
Malaysia	58.73%	63
United Kingdom	53.85%	13
Singapore	51.72%	29
Ireland	40.00%	5