AUSTRALIAN COUNCIL OF TESOL ASSOCIATIONS

SUPPLEMENTARY SUBMISSION TO

The Evaluation of the
Adult Migrant English Program (AMEP) "new business model"

1 May 2019

Introduction

Further to ACTA's previous submission, and in the light of additional feedback we have received as a result of its wider circulation and placement on our website, the Australian Council of TESOL Associations ACTA offers seven further recommendations to the Evaluation of the AMEP "new business model". These recommendations focus on the Evaluation *Statement of Requirements* regarding the **Australian Core Skills Framework (ACSF)**, viz.:

- the appropriateness, effectiveness and practicality of its use as a benchmark in initial, progressive and exit assessments, and
- its success or otherwise as a common assessment framework to align the AMEP and Skills for Education and Employment (SEE) Program.

Our recommendations below are preceded by a summary of the arguments that support them.

Drafts of this supplementary submission have been widely circulated and commented on. The final version has been approved by ACTA Councillors (representing their State/Territory affiliates), the ACTA Adult EAL Working Party, and those attendees at the ACTA Forums in Sydney, Melbourne and Brisbane who provided feedback on these drafts.

1. Why the ACSF cannot be used as an assessment tool or "framework"

As ACTA has detailed in our main submission, the adoption of the ACSF for use in the AMEP rests on **a misinterpretation of the 2015 ACIL Allen Review** and **misinformation about the ACSF**.

1.1 The AMEP "new business model" has seriously misinterpreted the 2015 ACIL Allen Review

ACIL Allen did not recommend adoption of the ACSF as *an assessment tool*.[1] Rather, they proposed further development of the *"preliminary mapping of LLN and ESL courses and test bands"* in their Appendix A. The ACIL Allen Appendix A provided a schematic presentation of equivalences between different **language proficiency assessment tools** (the ISLPR, IELTS, Canadian Language Benchmarks), **achievement assessments integrated in courses** (the CSWE and the CGEA) and **the ACSF "framework"**. This proposal was profoundly misunderstood in 2017 contracts, which included the hugely disruptive requirement that the AMEP *switch* **from one component of this overall schema to another**. See our main submission section 6.2 for further elaboration of this point. (In order to distinguish between the ACIL Allen Appendix A and the ACSF, we will refer to the ACIL Allen proposal as a *schema*.)

The ACIL Allen schema is included, once again, as Appendix A to this supplementary submission for your convenience and close consideration. We also include a more detailed version of this mapping which was done by AMES NSW (Appendix B).

Please note: **The ACIL Allen proposal that this schema be *developed* is the issue at stake here**. The preliminary mapping requires revision and refinement, especially in the light of changes since 2017: see below.

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[1] As elaborated in the main ACTA submission (p. 28), the ACSF has been variously described in Senate Estimates and by the Minister as a "framework", a description of "language level for placement in a language and literacy program, progression throughout and proficiency at exit", "a tool for measuring language proficiency", "the most commonly used assessment tool in the VET sector". In fact, it is a "framework", the meaning of which escapes ACTA. The other descriptions reveal considerable confusion about educational and English language assessment. However, the ACSF is clearly not a "tool for measuring language proficiency", which is why the Government has allocated $4.5 million over three years in the attempt to turn it into one (ACTA main submission, p. 45).

1.2 The justifications for using the ACSF in the AMEP are entirely misinformed

i. **The ACSF is *not* a tool for measuring (English) language proficiency, nor does it claim to be, nor can it be** because it is inherently –
   - **invalid** in specifying how English is developed as a second/additional language
   - **unreliable** in the variety and complexity of the tasks used to assess English language development, and in how these tasks are administered.

   Rectifying these problems would require major investment in rewriting and simplifying the whole ACSF (and especially Levels 1-3), which would be **a waste of material and human resources** because:

   - superior purpose-built assessment tools for the AMEP are already available, viz. the ISLPR and within the CSWE,
   - the ISLPR and the CSWE are familiar to most AMEP teachers, given that the ISLPR has been in existence and progressively refined since 1978, and the CSWE since 1992,
   - the ISLPR and CSWE are probably as good assessment tools as is possible for use in the AMEP.

ii. **use of the ACSF as an assessment tool does nothing to assist pathways into the SEE Program or the wider VET sector (despite claims to the contrary)[2]**, because:

   - all providers (including SEE Program providers) undertake their own initial assessments
   - the results from using the ACSF as an assessment tool are incomprehensible and meaningless to VET providers and employers.
   See ACTA main submission section 6.5.

Use of the ACSF as a "common assessment framework" has created a hypothetical "alignment" of the AMEP with the SEE Program. It serves only to satisfy the administrative convenience of the Department of Education & Training. **It has transferred to the AMEP all the problems that exist in the SEE Program.** See ACTA main submission sections 2, 6.6 and 7.

ACTA is concerned that the administrative convenience in extending use of the ACSF to the AMEP has blinded the Department to the conflicted interests of the Quality Assurance (QA) provider in promoting ACSF use in the VET sector. See ACTA main submission 7.4.

ACTA believes that it would be unconscionable to continue using an assessment tool that is so blatantly unfit for AMEP purposes simply because it satisfies the Department's convenience and would justify the (wasted) expenditure on installing it in the AMEP, including training teachers in its use. Regarding the latter, we attach the Comments from ACTA survey respondents regarding this training (see Appendix C). These are overwhelmingly negative.

However, the Department's yet unfinished data management system may well be locked into the ACSF (see ACTA main submission sections 6.6 footnote 77, and 7.3). Our proposals below accommodate this possibility.

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[2] See ACTA main submission section 6.1.

2. A way forward

ACTA's supplementary recommendations below seek to offer a way forward that accommodates the Department's administrative goals while allowing providers – and, we hope, individual AMEP Centres – to undertake valid and relatively reliable assessments of learners' initial English language proficiency and their attainment in curricula, determined in the light of English learning needs.

The preliminary mapping shown in ACIL Allen Appendix A offers precisely this way forward. What is required is further development of the schema to:

1) **more accurately determine equivalent *levels*** between assessment systems, especially in the light of the revised and newly accredited CSWE;
2) **include the Victorian English as an Additional Language (EAL) Framework** – see ACTA recommendation 29 (note: ACTA does not accept the CEP or CSL as suitable for the AMEP);
3) **progressively include mainstream VET sector courses/units and bridging courses** – this is a longer term project.

Development of the ACIL Allen schema will permit providers to undertake *assessments using any of the included tools/courses/frameworks* as they determine will best suit their learners' needs. If the Department is committed to using the ACSF in order to relate AMEP assessment levels to those in other VET courses, the Department could easily determine how levels on the ACSF equate to those in AMEP providers' chosen assessment tools. If the Department wants these data, it should take responsibility for this task.[3]

Developing this mapping further to **include more VET courses would – in a very concrete way – meet the (so far neglected) goals of facilitating the pathways that both ACIL Allen and the Department seek.** If the schema included the levels required for entry into bridging and mainstream VET units, all VET providers (and students) could use it to ascertain the relationships between the levels achieved in the AMEP and other VET course requirements. This kind of development is clearly what ACIL Allen intended and is urgently needed.

(As per Recommendation 2 in the ACTA main submission, adult migrants below the required levels for entry to mainstream VET courses would be eligible for the AMEP.)

The required mapping exercise would be relatively easy if ACTA's recommendation 18 in our main submission is accepted – **namely that the Attainment KPI be discontinued** – and that reporting to DET on achievement outcomes is **simply on exit levels which are not tied to any KPI** (Recommendation 19). The arguments for discontinuing any kind of Attainment KPI rest on this KPI's inherent encouragement to subversion, and the indisputable evidence that this subversion is now widespread. The Department needs to clarify whether it seeks accurate and useful data on AMEP outcomes (as per ACTA Recommendation 19) or whether it wishes to persist with the fictions that will inevitably underpin reporting against *any* attainment KPI.

If, contrary to ACTA's recommendation 18, progressive Attainment assessments were to continue (e.g. for every 200 tuition hours), any mapping exercise would be complex because it would require determining equivalences *item by item*. However, if progressive Attainment assessments are abandoned and the Department returns to collecting data on **exit levels in appropriate curricula**, the mapping exercise would be relatively simple. It would simply require determining equivalent levels in the schema.

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[3] Presumably, an algorithm could be developed in the new data management system that records equivalent levels automatically.

Acknowledging the current widespread aversion to further disruption in the AMEP, ACTA proposes that providers *and* individual AMEP Centres **immediately be given a choice of assessment method** for the remainder of the current contracts, as follows:

1) **for initial assessments:** the ACSF or the ISLPR

2) **for data collection purposes on exit level achievements** (but not an Attainment KPI): the CSWE, the EAL Framework, the ISLPR or the ACSF.

We suspect that most providers would return to using the ISLPR for initial assessments and would use the CSWE or the EAL Framework for achievement/attainment assessments. As detailed above, DET could interpret these assessments in line with their preference for the ACSF. Those currently using the unacceptable CSL and CEP could use either the ACSF or the ISLPR for reporting on exit achievements (or the Department could agree that, for the remainder of the current contracts despite their lack of acceptability for the AMEP, data on achievements in those curricula will be accepted).

Meanwhile, further development of the ACIL Allen schema should be expedited. This work would be considerably cheaper than persisting with the work still required to install the ACSF in the AMEP.

Our evidence-based proposals bring into sharp focus the financial costs (approx. $1.5 million over three years) that have followed from the misunderstandings and misinformation underpinning the mandate that the ACSF be used as an assessment tool in the AMEP. The cost implications of our recommendations (viz. developing the schema as ACIL Allen recommended) would eliminate the documented and hidden costs entailed in:

1) further (largely unsatisfactory) training of teachers to use the ACSF (see Appendix C)

2) audits of progressive assessments

3) adapting the CSWE Assessment Task Bank to the ACSF (because exit assessments of achievement would be based on assessments according to curriculum units/modules). [4]

Given that the current QA provider's expertise and commitments lie with the ACSF (and are unsupportive of both the ISLPR and CSWE), ACTA's recommendations expose that provider's vested interest in promoting the ACSF. ACTA holds the strong view that the narrow focus of Quality Assurance in the AMEP (and SEE Program) needs rethinking and that a different, truly independent QA provider is urgently required.

3. ACTA's supplementary recommendations

To provide a way forward that accommodates both the Department's commitment to the ACSF and the need for valid and reliable assessments of English language learners in the AMEP, ACTA makes the following recommendations in addition to those in our main submission.

Supplementary Recommendation 1: Within the current contract and *taking immediate effect*, providers should be given the option of (1) using the ISLPR or the ACSF for initial assessments, and (2) using the CSWE, EAL Framework, ISLPR or ACSF for reporting exit attainment data to DET.

Supplementary Recommendation 2: DET should take responsibility for ascertaining equivalent ACSF levels if required for their own data management purposes.

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[4] For documented costs, see ACTA main submission, section 6.6, p. 45. Hidden costs attach to provider time in introducing the ACSF for initial and progressive assessments, training and supporting their staff, and preparing for audits. Considerable unpaid staff time has gone into and is still needed to develop tracking tools, participate in the National Working Group, and contribute to the Assessment Task Bank. See ACTA main submission re increased workloads: Chart 1 and p.45ff. Other costs attach to what has been and is sacrificed in instituting, maintaining and extending the ACSF, e.g. the diversion of professional development to the ACSF.

Supplementary Recommendation 3: As a matter of urgency, the conceptual schema in the ACIL Allen *Preliminary Mapping of ESL Courses and Test Bands* should be developed to (1) revise and update **equivalences in *levels*** between the ACSF, the ISLPR and the CSWE, and (2) include the EAL Framework. A longer term project should extend the schema to include mainstream VET units that offer likely pathways for AMEP learners.

Supplementary Recommendation 4: This mapping work should be undertaken by an expert group that includes (1) owners/representatives of all assessment tools/systems/frameworks being mapped, (2) at least three-four practising teachers with experience in delivering the AMEP, SEE Program and relevant VET units and/or mainstream bridging courses, and (3) one or two independent language assessment experts (for example, from the Language Testing Research Centre at Melbourne University). The group should be chaired by a language assessment expert with no vested interest in any of the systems being mapped.

Supplementary Recommendation 5: AMEP and VET providers should be encouraged to collaborate and document current and possible future options for concurrent enrolment in the AMEP and mainstream VET units or bridging courses, and on-going pathways from the AMEP into VET units where English levels have been specified. However, ***on no account*** should this collaboration entail (1) substitution of AMEP tuition entitlements for concurrent enrolment in a VET unit, (2) entry to VET courses where students' English is not at the required level, or (3) use of teachers in the AMEP who lack without post-graduate TESOL qualifications.

Supplementary Recommendation 6: AMEP providers should be encouraged to use innovation grants to experiment with, develop and document models re time-tabling, class sizes and other arrangements in collaboration with mainstream VET providers to facilitate AMEP students enrolling in mainstream VET units or bridging courses either concurrently (at appropriate English levels) or subsequent to their AMEP course. These experiments should include AMEP tuition that is targeted to assist students to meet the English language demands of these mainstream courses, i.e. English for special purposes.

Supplementary Recommendation 7: The AMEP contract with the current QA provider should be reviewed with a view to its immediate termination, with appropriate compensation given to the provider. New tenders should be sought for Quality Assurance that, for the remainder of this contract, is based on the previous AMEP Standards. (See also ACTA main Recommendation 21 re researching and determining new KPIs).

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Appendix A:
ACIL Allen Table 3 - Preliminary mapping of LLN and ESL courses and test bands to ACSF

Table 3   Preliminary mapping of LLN and ESL courses and test bands to ACSF

Australian Core Skills Framework (ACSF)	Certificate in Spoken and Written English (CSWE)	International English Language Testing System (IELTS)	International Second Language Proficiency Ratings (ISLPR) General	Test of English as a Foreign Language (TEOFL)	Canadian Language Benchmarks	Certificate in General Education for Adults (CGEA)
Level 1	Preliminary Course in SWE (partial) Certificate I (broad)	0 Did not attempt test 1 Non user 2 Intermittent user	0 Zero proficiency 0+ Formulaic proficiency 1- Minimum 'creative' proficiency	0-8 9-18 19-29	CLB 1 Initial basic CLB 2 Developing basic	Course in Initial General Education for Adults (broad)
Level 2	Certificate II (broad)	3 Extremely limited user	1 Basic transactional proficiency	30-40	CLB 3 Adequate basic	Certificate I Introductory
Level 3	Certificate III (broad)	4 Limited user	1+ Transactional proficiency	41-52	CLB 4 Fluent basic	Certificate I
Level 4	Certificate IV (broad)	5 Modest user 6 Competent user 6.5	2 Basic social proficiency 2+ Social proficiency 3 Basic vocational proficiency 3+ Basic vocational proficiency plus	53-64 65-78	CLB 5 Initial intermediate CLB 6 Developing intermediate CLB 7 Adequate intermediate CLB 8 Fluent intermediate	Certificate II (broad) Certificate III (partial)
Level 5		7 Good user	4 Vocational proficiency	79-95	CLB 9 Initial advanced CLB 10 Developing advanced	Certificate III (broad)
		8 Very good user	4+ Advanced vocational proficiency	96-110	CLB 10 Developing advanced CLB 11 Adequate advanced	
		9 Expert user	5 Native level proficiency	111-120	CLB 11 Adequate advanced CLB 12 Fluent advanced	

Source: ACSF; http://islpr.org/why-use-islpr/summary-of-islpr/, viewed 10 November 2014; http://www.ielts.org/institutions/test_format_and_results/ielts_band_scores.aspx, viewed 10 November 2014; Canadian Language Benchmarks 2012 edition; *Implementation guidelines: Certificates in General Education for Adults*, DEECD 2014.

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We note that in the ISLPR column:

- Levels 3-5 should read "vocational" with inverted commas marking a broad use of this term
- Level 5 should be "native-like" proficiency.

Notified by E. Wiley (26/0419).

Appendix B:
Map of equivalent levels in various assessment systems

ALIGNMENT OF CERTIFICATES TO PROFICIENCY SCALES AND REPORTING SYSTEMS

Proficiency descriptors	ISLPR levels		IELTS band descriptors		ACSF	CSWE
Advanced	5	**Native-like proficiency** Proficiency equivalent to that of a native speaker of the same sociocultural variety	9	**Expert user** Has fully operational command of the language: appropriate, accurate and fluent with complete understanding		
	4⁺	**Advanced vocational proficiency** Level 4+ behaviour is significantly better than level 4 but has not reached Level 5	8	**Very good user** Has fully operational command of the language with only occasional unsystematic inaccuracies and inappropriacies. Misunderstandings may occur in unfamiliar situations. Handles complex detailed argumentation well	**Level 5** Autonomous Accesses and evaluates support Adaptable across range of contexts Specialised in one or more contexts Highly complex texts with highly embedded information, specialised language and symbolism Sophisticated task conceptualisation	
	4	**Vocational proficiency** Able to perform very effectively in almost all situations pertinent to social and community life and everyday commerce and recreation, and generally in almost all situations pertinent to own 'vocational' fields	7	**Good user** Has operational command of the language, though with occasional inaccuracies, inappropriacies and misunderstandings in some situations. Generally handles complex language well and understands detailed reasoning.		
	3⁺	**Basic vocational proficiency+** Level 3+ behaviour is significantly better than level 3 but has not reached Level 4	6.5		↑	**CSWE IV** Focuses on language skills to enable learners to participate in a range of vocational contexts and/or further study contexts
	3	**Basic vocational proficiency** Able to perform effectively in most informal and formal situations pertinent to social and community life and everyday commerce and recreation, and in situations which are not linguistically demanding in own 'vocational' fields	6	**Competent user** Has generally effective command of the language despite some inaccuracies, inappropriacies and misunderstandings. Can use and understand fairly complex language, particularly in familiar situations	**Level 4** Works independently Initiates and uses support from range of established resources Range of contexts with some specialisation Complex texts with embedded info, specialised vocabulary and abstraction Complex task organisation and analysis	
	2⁺	**Social proficiency** Level 2+ behaviour is significantly better than level 2 but has not reached Level 3	5	**Modest user** Has partial command of the language, coping with overall meaning in most situations, though is likely to make many mistakes. Should be able to handle basic communication in own field		
Intermediate	2	**Basic social proficiency** Able to satisfy basic social needs, and routine needs pertinent to everyday commerce and to linguistically undemanding 'vocational' fields	4	**Limited user** Basic competence is limited to familiar situations. Has frequent problems in understanding and expression. Is not able to use complex language	**Level 3** Works independently Range of familiar contexts with some less familiar elements Short and simple texts Tasks including number of steps	**CSWE III** Focuses on language skills to enable learners to satisfy basic social needs in routine situations for everyday commerce, recreation and linguistically undemanding *vocational* fields
	1⁺	**Transactional proficiency** Able to satisfy everyday transactional needs and limited social needs				
Post-beginner	1	**Basic transactional proficiency** Able to satisfy basic everyday transactional needs	3	**Extremely limited user** Conveys and understands only general meaning in very familiar situations. Frequent breakdowns in communication occur	**Level 2** May call on expert Familiar and predictable contexts Routine texts with some specialised vocabulary Concrete tasks	**CSWE II** Focuses on language skills to enable learners to satisfy their own simple everyday transactional and limited social needs
Beginner	1-	**Minimum creative proficiency** Able to satisfy immediate, predictable needs, using predominantly formulaic language	2	**Intermittent user** No real communication is possible except for the most basic information using isolated words or short formulae in familiar situations and to meet immediate needs. Has great difficulty understanding spoken and written English	**Level 1** Works alongside expert Highly familiar restricted concrete contexts Simple texts with clear purpose and highly familiar vocabulary Explicit tasks	**CSWE I** Focuses on language skills for learners who have just started learning English and who have had minimal exposure to English
	0⁺	**Formulaic proficiency** Able to perform in a very limited capacity within the most immediate, predictable areas of need, using essentially formulaic language	1	**Non-user** Essentially has no ability to use the language beyond possibly a few isolated words		
Absolute beginner	0	**Zero proficiency** Unable to communicate in the language	0	Did not attempt test	Pre- level	**PCSWE** Focuses on language skills for learners with no or low levels of education and/or language

Notes:

Appendix C:
ACTA survey respondents' comments on their experience of professional development in using the ACSF

The following 55 comments were made in response to the ACTA survey Question 64: *What effect has professional development (PD) had on your professional opinion of the ACSF?*

The comments are presented complete and unedited except for spelling and punctuation.

1. ACSF is not specifically designed for TESOL. It is the wrong tool for TESOL as it does not specifically address language components in a manner most suited to TESOL, such as an itemised assessment of phonetics and grammar. ISLPR is a superior tool for TESOL. It should be used instead. ASCF should be left to assessment of literacy and numeracy to students for whom English is their first language.

2. I like the ACSF, believe it is a valuable if somewhat blunt instrument for monitoring progress of language learners. PD days are a pain and not very contextualised to us as English language teachers: it's not same as teaching motorcycle maintenance.

3. The ACSF is a shoe that doesn't fit the AMEP foot!

4 The ACSF has caused a great deal of anger and angst among teachers, not just because of the huge workload increase but because it has absolutely no value as an indicator of progress. The workload increase is exacerbated by the students' resentment at having to do MORE tests, and by the fact that it takes them away from their learning. The workload is doubled by having to find time to test as well as having to prepare the tests, annotate them and then write a report (originally 2 reports.) Our requirement has recently been reduced but it has still has a huge impact on our daily workload and stress.

5. I do not believe this is the best system of assessment for our students.

6. The PD has highlighted the inadequacies inherent in the ACSF as a tool for native speakers of English and the expectation that teachers have no life beyond the classroom as the paperwork expected to meet the requirements for assessment are well beyond what should be necessary.

7. Having said that I feel that CSWE and the ACSF often do not marry and there are times the assessments given need to be modified to satisfy the ACSF curriculum.

8. At least I understand it now and how to use it. However, I'm not happy with it - it's cumbersome and unnecessarily time consuming. In my opinion it's over compliance and does not help the students to improve their English. In fact, it hinders them because too much time is spent on compliance and not enough on actual teaching. All the teachers are stressed and over worked, especially those who have multi-level classes with high numbers.

9. In my opinion, the ACSF is not suitable for clients with non-English speaking backgrounds who learn English as their main goal. Its indicators cover a wide range of performance features which students cannot perform in the assessment tasks. The more we learn about ACSF, the more I wish we could stop using it and focus on a curriculum. How can we "tailor to individual needs" when we have a group of multi-level students with spikey profiles and start at different times? 1 trainer to 20 students? Many of them are illiterate, and cannot even write the words on a straight line. Another big lie! Sorry!

10. The answers are really not very apt. I would have preferred to check, 'Increased my knowledge of the ACSF' (as a result of PD).

11. I have had to do all my own research and others ask me for advice on calibration to IELTS/ Cambridge and EQF/CEFR frameworks. It's part time research I have been doing. My professional development is self motivated and some it is automaton. University Ed faculties should be teaching in service teachers and ITE undergrads about the ACSF.

12. The ACSF is a perfectly fine tool for native speakers of English. I believe it has very limited applicability to students who are at or below a functional level of English. My main cause of dissatisfaction is that now is

excessive time spent on numerous checks and balances for compliance, and this is time wasted that could be spent on improving learners' functional English. I already believe that 510 hours is not adequate to achieve this. These are largely marginalised and vulnerable people we are dealing with, they deserve to be treated as more than just a series of check boxes and performance indicators. I understand that compliance needs to happen, but I believe it was working just fine before with the ISLPR and learning outcomes of the CSWE.

13. ACSF is an excellent Skills Framework which I believe should be used to inform the TESOL and LLNP practitioners' choices in terms of text types, their language features and functions. However, there has been a growing frustration among TESOL/LLNP professionals with the TOP DOWN approach to programming in AMEP/ LLNP courses which could be counterproductive and may reduce teacher initiative and creativity in developing lesson plans addressing students' needs.

14. PD sessions have shown the ACSF assessments to be a futile, meaningless, time and money wasting activity for taxpayers, students and teachers.

15. Does not work with our cohort of students Migrants/refugees/asylum seekers - quality has definitely been compromised with this fixation on ACSF indicators, tests, ongoing assessments for progress. Our poor students are inundated with tests and us teachers.

16. ...but still not really satisfied with it.

17. THE LWA PD WORKSHOPS ARE TARGETTED AT WHAT PROVIDERS NEED. THE WORKSHOPS ARE PROFESSIONALLY PRESENTED AND THOROUGHLY COVER USE OF THE ACSF.

18. It's just not appropriate. Students need to learn English before they can get jobs!

19. ACSF might have some kind of place in the world of literacy but it's being overkilled in SEE. Assessing students against the ACSF is intrusive and overkill in terms of assessing people's objective numeracy and literacy ability.

20. Every single teacher I have talked to hates the ASCF with a vengeance as it is so vague and each teacher can interpret in their own way. What are basic tenses? What is the vocabulary that distinguishes the levels? Why do I feel that .03 and .05 are not testing students' proficiency but are testing the tests themselves? The ACSF is bizarre, ambiguous, nonsensical and unlike any textbooks or curriculum I've ever encountered in my whole life as a language learner myself (for 10 years studying the language intensively) and then as a teacher of the language for 16 years now. I am a practitioner, not a researcher; therefore I am not equipped with the skills to support my claims with solid evidence. However, I can state that there is something seriously wrong with the Framework, and when it is a unanimous opinion it is to be reckoned with.

21. The ACSF was designed for the workplace and for one-on-one (teacher and learner) teaching. This has been transferred to the classroom, so now the teacher has to juggle whole class teaching and individual teaching/assessment. It is onerous. I have had up to 4 groups in a classroom doing ACSF tasks as their assessment tasks were due. This is not uncommon.

22. I've become familiar with the ACSF and competent with using it for initial assessments but I don't think it is an appropriate framework for students seeking to learn English as an additional language as it is so culturally based - presuming exposure to western industrial schooling systems.

23. ACSF benchmarks have nothing to do with ESL learners.

24. Professional development has been very limited and was given after the fact.

25. I don't believe ACSF or CSL should be used to teach and assess ESL learners - they are literacy based not language based.

26. The attitude of LWA at the start of the contract was disparaging of CSWE and settlement and of the processes we used to assess and judge performance. Particular staff at LWA saw themselves as kings and queens and us as their subjects and expected us to treat and follow them as they demanded. Feedback to the DET/AMEP has seen a reduction in this attitude. I still believe the ACSF should not apply to AMEP students and over assesses them to the point they do not enjoy class.

27. It is not useful as an indicator of student's abilities.

28. The more we discuss it, the more dissatisfied I am.

29. Not fit for purpose.

30. I don't dislike it - I think it's a reasonable tool for description, especially for native English speakers - but I'm not so thrilled with it for our learners. I'm really, really sick of the way we have to provide so much detail for the auditors, however - it just seems to be making work for someone.

31. We've had very little PD.

32. The ACSF is old. It was originally designed for individual assessment for people in the workplace to decide what level of literacy and numeracy they have and to determine what course they need to do to upgrade their skills etc. It doesn't assess students' understanding of intercultural nuances. It fails to identify what students don't know and need to learn. The ACSF is like NAPLAN and forces teachers to just prepare for that test so students pass and the KPI is passed so that the provider gets their funding. Benchmarking students to a particular test written by a particular cohort of professionals such as the ACSF assessments as at the entrance to the AMEP needs reviewing. What are the gender, ethnic, geographic and class biases represented in these assessments? Is it a world class recognised benchmark? Students get far different results on the ACSF entrance test versus the BKSB. So which is the real benchmark for students' performance? Both are based on granting funding to students.

33. PD - TAE - none whatsoever.

34. I had a little bit of training but it was so inadequate. No glossary of terms. No examples. No manuals. No bank of material and no file path. A hopeless situation.

35. Hasn't altered my opinion though has made me more familiar with it and therefore made it a little easier to use as required.

36. I am required to participate in approximately 60 - 70 hours of PD a year but have avoided this so far. However I think the ACSF is an excellent tool.

37. It's too detailed, ISLPR is sufficient enough.

38. Not exactly increased my satisfaction but allowed me to better understand what was required and so be a little more efficient in dealing with the paperwork.

39. From scathing to tolerant.

40. It is still a farce but that is because we obviously have to try and make it look like students have increased their ACSF scores when they often haven't and it increases teachers workload exponentially. The actual assessments I think are good.

41. This is a tricky question. Initially, I embraced the change as a way to help my beginner students' progress to be recognized (as compared to CPSWE). But after a year of using the ACSF, for progressive assessments, I have found it to be totally inappropriate in measuring progress.

42. In particular one of the employees that facilitated the forum at the beginning of 2018 was abrasive, unapproachable, cold and lacked empathy and understanding with the group in general.

43. I'm totally ok with the ACF. I am experienced with the ACSF.

44. A waste of time, as there have been changes made every meeting - the system was not thought through before it was introduced, and there was a total lack of resources.

45 At a PD session run by LWA, they introduced a term - "non-continuous text". None of the 100- plus lecturers present had ever heard of it, but LWA stressed its importance. I stood up and asked them to define/clarify it - I was rebuffed with the contemptible and contemptuous answer: "It's implicit." This meant that the woman herself didn't know but was unwilling to admit the fact; it is not insignificant that she is one of the people who bought the whole thing from Linda Wise [I can't remember her name - I only remember her appalling attitude].

46. I have a better understanding of the ACSF as a result of PD, but I couldn't say that it has convinced me why it is better than ISLPR for initial assessment of students for placement in our program, or how it improves teaching of English to CALD clients.

47. Every time I had PD on the ACSF I felt I was being asked to do something that was meaningless, considering that the CSWE is aligned to ACSF levels. Why have 2 benchmarks for language development?

48. The ACSF is not appropriate to the area of language learning. There have been decades and decades of research by language specialists to develop language specific assessments. The ACSF is to language is like a square peg into a round hole.

49. A mess.

50. I understand it better, but it remains just an irritant really.

51. Our internal PDs are only catering to the curriculum-CGEA but external workshops/Pds are once a a year and only relate to ACSF.

52. PD was irrelevant and only happened in June. I had already worked out and found information I needed on ACSF from other teachers and from own reading.

53. ACSF does not fit with an English as a second language course. ISLPR is the appropriate and tested method of assessment.

54. I have had PD on the ASCF but I still don't feel familiar with it.

55. When I first started teaching at TAFE, I used the National Reporting System. When the ACSF was introduced, I went to the initial PD sessions but by default I ended up being timetabled on AMEP classes. Then with the new AMEP contract, I was suddenly placed with having to use the ACSF. The PD I have received over the years have been piecemeal and of little substance. There is a lot of the blind leading the blind. From my reading of the ACSF document, use of it and by my observations, I find this to be a very, valid tool in so many ways. Both the AMEP and SEE are now meant to use ACSF indicators to place students into classes but initial assessors vary significantly in how they 'subjectively' assess students resulting in students gaining higher or lower indicators and are poorly placed. Teachers are then meant to show progression by getting students through at least one ACSF indicator per 200 hours. However, where is the VALIDITY in this form of assessing? There is far too much subjectivity involved. The so-called verification process is supposed to be able to help ensure there is validity and reliability of assessment tools and use of them but this is not happening. It is far too easy to exploit. The ACSF may appear on paper as something of value to measure KPIs and to justify continual funding. However, the amount of money, time and effort to keep this program going has come at the cost of creating and implementing an excellent TESOL curriculum with appropriate course material and assessment for the AMEP and SEE.

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