

W(h)ither the Adult Migrant English Program? Political posturing and real outcomes

by Helen Moore



As I write, the future of the Adult Migrant English Program (AMEP) is unknown. Two alternative future pathways for the Program prompt my title question:

- Will the forthcoming AMEP contracts send the Program even further down the path to becoming a deracinated, hollowed-out pretext for English language provision, doomed to continued criticism for failing to meet the real English learning needs of adult migrants to Australia?
- This is the pathway laid out in the Department of Home Affairs' most recent document: *AMEP Consultation and Funding Model Comparison Report* (Australian Government, November 2021).

OR:

- Will the forthcoming AMEP contracts set the Program on the path to becoming once again “the best program of its kind in the world”?
- This was the ambition espoused by the Department of Home Affairs AMEP Policy Team in December 2019 in their request for feedback on the papers *Adult Migrant English Program Vision* and *Improving the AMEP*.

My article describes these contrasting pathways.

In a few days/weeks/maybe months, a Request for Tenders for new AMEP contracts will tell us which path the policy makers have chosen.

“Outcomes” as the defining framework

The most recent public pronouncement on the AMEP was on 7 February 2020 (on the eve of the first COVID-19 outbreak) by the then Acting Immigration Minister, Alan Tudge on behalf of the Minister, David Coleman. Forthcoming reforms to the AMEP would, he said, reverse poor labour market participation by those with inadequate English, particularly humanitarian entrants:

English is more important than ever in the labour market – with less low skilled jobs and growing occupational health and safety standards which require a basic understanding of the language.

According to the Centre for Policy Development, 85% of those who speak English very well are in the labour market, versus only 15% of those who cannot speak English.

BNLA data shows that when identifying reasons for finding it difficult to get a job, close to 60% of humanitarian entrants said: “my English isn’t good enough yet”. (Coleman, 2020).

The policy frameworks governing public programs can be framed in many ways. However, since the early 1990s, “outcomes” have dominated the policy rhetoric in all spheres. Continuing in this tradition, the Minister stated that, “we are also changing how we measure progress in the AMEP and we will be monitoring outcomes more closely. I want providers to improve their performance and I want participants to commit to doing the work” (Coleman, 2020).

In a follow-up interview, the Acting Minister told the ABC’s Virginia Trioli that “the outcome which we’re getting overall [from the AMEP] is not satisfactory.” The reasons why 60% of students do not complete their entitlements to free AMEP tuition were explained as follows:

Some say that it’s because they actually do have some work obligations, some say because of family commitments, others say because the classes simply aren’t working for them. We’ve had a review into this and we’re acting upon this review to reform it to provide greater flexibility and we want to trial different things because unless we get that [sic] English language improvements, we’re not going to see a dramatic increase in the employment rate and that’s our ultimate objective. (Tudge, 2020)

The Minister’s decision about what constitute AMEP outcomes will determine the AMEP’s future pathway.

The “Outcomes-based Payment Model” and its real outcomes

The November 2021 *AMEP Consultation and Funding Model* was, we understand, the last step in public consultations on the proposed reforms. It follows over five years of intense discussion about the AMEP. In the public domain, this discussion included at least seven published reports (Parliament of Australia, 2017; Scanlon Institute, 2019; Social Compass, 2019; Shergold, Benson & Piper, 2019; Senate Legal and Constitutional Affairs Legislation Committee, 2020; Settlement Council of Australia, 2020; Centre for Policy Development, 2020).

Since 2016, the Australian Council of TESOL Associations (ACTA) has made 12 submissions, given evidence to two Parliamentary Inquiries, hosted 10 forums (2019 and 2021) and met four times with advisers to three different Immigration Ministers. The ACTA Vice-President (the author) was also a member of the short-lived AMEP Advisory Committee in 2020-21 and, in that capacity and along with other Committee members, wrote four detailed papers at the Department’s request. The above-named *AMEP Consultation and Funding Model Comparison Report* states that the Department of Home Affairs consultation process included “over 300 attendances at nine forums and 92 written submissions” (p. 3).

In these discussions, there was no dispute that the AMEP could be improved.

The central outcome of these considerations, as set out in the 2021 *AMEP Consultation and Funding Model*, is an “Outcomes-Based Payment Model”. However, *not one* of the above reports, submissions and consultations – at least in the public domain – proposed that AMEP outcomes should be specified through a payment system.

The proposed Outcomes-Based Payment Model would pay providers for:

1. initial assessments of potential AMEP students
2. student commencements
3. student completion of “milestone” hours
4. student completion of curriculum units.

Providers would receive extra financial loadings for students in remote locations and those with disabilities and “high language, literacy and numeracy needs”.

Providers will no longer be paid for tuition hours – these are said to be “inputs”.

How or why items 1 – 4 in the list above constitute AMEP outcomes – and how these items differ from tuition hour “inputs” – is not explained.¹

The crux of the Outcomes-Based Payment Model is that “[curriculum] unit *successful* completion” will attract a 20% higher payment than “unit *unsuccessful* completion” (my italics). None of the above discussions – at least in the public domain – proposed *differential* payments for “successful” versus “unsuccessful” student attainment. (An earlier version of this model proposed that 67% of payments should be for *reports* on assessments, irrespective of a student’s achievement.)

How items 1–4, the financial loadings and paying extra for successful unit completions relate to the Minister’s “ultimate objective” of “a dramatic increase in the employment rate” has not been explained.

Clearly, the outcome of bonuses for successful unit completions will be successful unit completions, irrespective of how large or small the bonus.

However – leaving aside the moot relationship between “successful unit completion” and improving the adult migrant employment rate – how will anyone know what “successful completions” means? Attempting to discover the answer will require expensive, time-consuming and largely fruitless auditing of student assessments. These audits will be necessary to mitigate provider managers’ pressure on teachers to advance students through as many curriculum units as fast as possible.

A key reason adult migrants give for AMEP classes “simply not working for them”, as described by Minister Tudge, was documented in a report on community and stakeholder consultations on the 2017–2021 AMEP contract. The report was commissioned by the Department of Home Affairs and undertaken by the Settlement Council of Australia (SCoA). Foremost in the list of “Areas not working or needing improvement” was:

an over-emphasis on assessment under the Australian Core Skills Framework (ACSF) model – many participants stated that this is not a suitable approach to gauge language learning. The over-emphasis on assessment has inhibited learning, making it more academic, and less focused on effective settlement. Much of the class time is spent preparing for and conducting assessments, at the expense of actually

teaching English. AMEP outcomes could be better measured using a broader set of social and economic participation indicators, including the social benefits of belonging to a language learning community – such as building networks and social capital. ... ACSF reporting is restricting the ability of teachers, administrative staff and management to offer a flexible AMEP program which is responsive to clients' settlement needs. (SCoA, 2020, p. 3)

Rather than rectifying this problem, the Outcomes-Based Payment Model makes providers' incomes directly dependent on assessment and reporting. It incentivises them to *increasing* assessments as much as they can.

Table 1 on page 34 offers some insight into what the SCoA report describes as “an academic understanding of English”. It presents a summary description of a Certificate 3 assessment task in the AMEP Assessment Task Bank. Nine pages of teacher instructions are organised under the following headings: Performance Evidence; Knowledge Evidence; Assessment Conditions; Assessor Instructions; Curriculum Mapping; Marking Guide; ACSF Mapping; Learner Instructions; and Task.

The task is designed to assess the “element”: *Comprehend a range of routine written social texts*. To achieve this element, 100% correct answers on two such tasks are required. According to one teacher, documentation of evidence for achievement in this one task requires 14 pages per student. Four such tasks are normally administered per 10-week AMEP term.

It is difficult to see how this assessment task is relevant to the learning needs or aspirations of adult migrant English language learners. The subject matter is trivial and Anglo-centric. The assumption that couples co-habit before marriage would be offensive to people from some cultural backgrounds. The correct answer to the question “What will the guests wear to the party?” is “colourful but casual clothes”, which appears to be the required inference from the fact that the party is beside the pool. The English is inauthentic and contrived (and clumsily repeats the word “big” within two lines).

This task bears no relation to needs-based analysis or good practice in assessing English learning. It is entirely directed towards meeting auditing and curriculum accreditation requirements. These requirements dictate the inflated,

atomised and technical approach to assessment, the task's abstraction from authentic English and its disregard for content appropriate to adult migrants.

The *real* outcome of paying for unit completions will be that these inappropriate assessment practices will intensify.

In addition to intensified auditing, the Outcomes-Based Payment Model will more than double administration for both providers and the Department. The Model increases current provider invoicing from three steps to six, with further steps in determining, calculating and invoicing for individual student loadings (according to yet to be clarified criteria). Payments attached to unit completion (successful or unsuccessful) will further increase invoicing, because the Certificates awarded through the AMEP consist of multiple units. All these invoices will require checking and verifying by the Department.

Nowhere has evidence been advanced that program improvements follow from payments for outcomes. However, clear evidence exists to the contrary (e.g. Ferlie, Lynn & Pollitt, 2005).

Real and indisputable outcomes from the Outcomes-Based Payment Model will be:

- AMEP credentials with dubious credibility because they are financially incentivised
- teaching directed to assessment tasks governed by requirements that are irrelevant to learning English and migrants' settlement, vocational and social needs or aspirations
- continued poor AMEP student retention because of dissatisfaction with this kind of teaching
- increased and more intense compliance auditing to mitigate the Model's perverse incentives
- increased administration
- increased teacher frustration at the constraints on their professionalism, which leads to further resignations
- absolutely *no* credible, valid or reliable method for measuring and evaluating the performance of individual providers or the AMEP overall.

An alternative model of outcomes

To determine legitimate, worthwhile AMEP outcomes, we need first to distinguish between the *national goals* to which the AMEP contributes and *specific outcomes* against which the AMEP's performance can be evaluated.

Table 1

Summary of an Assessment Task from the AMEP Task Bank – Certificate 3 Level

Text in italics is verbatim from the task bank. Other text is a summary. All material © Commonwealth of Australia (CC BY 4.0)

Performance Evidence (summary extract)

The learner must read and understand two of the following types of “social texts”: *personal email, social media entry, blog entry, online entry*. They must contain an *explanation, description, story text or a viewpoint*.

Knowledge Evidence (summary extract)

The learner must be able to demonstrate essential knowledge required to perform the tasks outlined in elements and performance criteria of this unit effectively. This knowledge is itemised (see list below). Beside each item is shown the question numbers in the test that assess it. Some items are tested in multiple questions.

- *self-correction strategies for writing*
- *culturally appropriate language*
- *dependent and independent clauses*
- *a range of tenses*
- *skimming and scanning*
- *reading for detail*
- *topical vocabulary*
- *register*
- *simple and complex sentences*
- *punctuation and spelling*
- *using context cues to decipher meaning of unknown words*

Assessment Conditions

Use of a dictionary or thesaurus is permitted.

Assessor Instructions

Describes 10 steps in administering the test.

Curriculum Mapping

Shows how the test questions relate to the following “Performance Criteria” as specified in the accredited curriculum: *Determine audience, context and purpose; Predict vocabulary and content from context, layout and headings to activate prior knowledge; Scan for key information and topical vocabulary to aid comprehension; Extract main points and relevant details to consolidate comprehension.*

Marking Guide

Gives detailed specifications of what can be accepted as correct answers to the 12 test questions. All questions must be answered correctly.

ACSF Mapping

This section is not summarised here because ACSF mapping is no longer required (ACSF Mapping accounts for approximately two of the nine pages).

Learner Instructions

Five instructions to be given verbally to students.

Task

The student must read a text and answer questions. The text is an email invitation to an engagement party addressed to “Theresa and Sam” and signed “Su”. The full text is approximately 225 words. The extract below gives an idea of style and content:

Well, we did it. We're finally going to get married.

Because you've both been such important people in our lives for the last ten years and getting engaged deserves a special party to celebrate the big news, we would be so pleased if you could join us for the big announcement. It's no big event – we'll save that for the wedding. It's just a get-together of friends and family by the pool, with lots of good food and fun!

...

As we've been together for a while now and have everything we need, gifts are not necessary (you know how small our flat is!). However, knowing you, you will probably want to anyway, and that's ok.

National goals

The AMEP is funded by the Commonwealth Government to support Australia as an immigration nation. In this context, the Program seeks to *promote adult migrant English language learners' success in:*

- settling in Australia
- accessing pathways into training, education and employment
- achieving their own personal and collective social and economic wellbeing
- contributing to Australia as a vibrant, prosperous, pluralistic and socially cohesive society.

English language learners' success in achieving these goals depends at least as much on circumstances beyond the AMEP as their experience in the Program. For example, the AMEP has no control over key determinants of migrant employment outcomes. Although an individual's English proficiency clearly plays a role in gaining employment, other crucial determinants include job vacancies, qualifications recognition, and opportunities and support for further training and education.

Further, the AMEP does not control the factors that impact on an individual's success in learning English – most notably his/her previous education and age – although teaching can and should respond to these factors. Defining and evaluating the AMEP's performance using measures of exiting students' success in relation to any or all of the goals listed above would be invalid, unreliable and impossible in practice.

Nevertheless, the Minister's linking of English language learning to labour market participation is well grounded. As an English language program, the AMEP can *contribute* to broad national goals, including employment. This contribution has been, can and should be researched, reported, and, where appropriate, measured, including over time. The AMEP's capacity to contribute to these goals can also be enhanced or hindered. A welcome reform announced in the November 2021 *Consultation and Funding Model* document is "AMEP Connect" to support collaboration between AMEP providers and "community organisations, local employers, councils and Chambers of Commerce" (p. 8).

The context in which the AMEP contributes to national goals is represented in Figure 1.

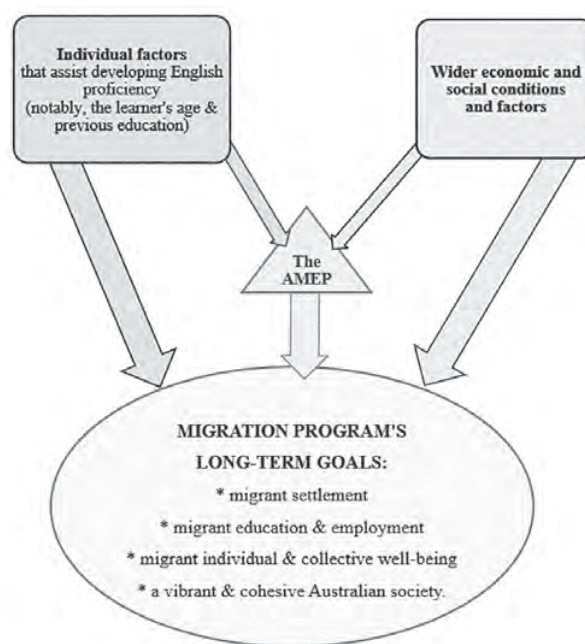


Figure 1: The context of the AMEP's contribution to national goals

Substantive, measurable outcomes: the ACTA proposal

Within the context of the AMEP's contribution to broad national goals, we can also identify outcomes which are largely under the control of those who administer and deliver the Program. Governments (notably the Minister and Departmental officials who determine and regulate the conditions under which the AMEP operates) and providers (viz. managers and teachers who deliver the AMEP) can legitimately be held responsible for these outcomes. Performance against these outcomes can be measured and these measurements can be used to evaluate providers' and the government's delivery of the Program.

In submissions on the AMEP, ACTA has proposed that the AMEP's performance can be validly and relatively reliably measured and evaluated against the following five outcomes:

1. Adult migrant English language learners' participation in the AMEP

Participation can be measured over time and evaluated in relation to evidence-based benchmarks for various learner cohorts, taking account of key external variables, notably (un/)employment rates.

2. AMEP students' English language gains

English gains can be measured, tracked and evaluated against evidence-based benchmarks for various cohorts,

taking account of entry levels (including age and previous education) and the time spent in the Program.

3. AMEP student satisfaction

Students' can be asked to evaluate their AMEP experience in relation to program quality, their personal goals and the overall national goals served by the AMEP. These evaluations can be cheaply, consistently and routinely documented through a well-designed and appropriately administered process, measured and tracked over time, and used to develop evidence-based benchmarks.

4. AMEP provider quality

Individual provider quality can be assessed according to recognised standards for English language programs for adult migrants. Comprehensive AMEP standards were developed, published and used under previous contracts (NEAS, 2009). To measure provider quality, reports on providers' performance in relation to standards can be mapped onto an A–E scale.

5. The evidence base that supports AMEP policies, practices and evaluations

The AMEP should be supported by a robust evidence base that:

- provides benchmarks for Outcomes 1 – 4 above
- independently researches and documents the AMEP's contribution to national goals
- creates knowledge and feedback loops for continuous improvement.

Figure 2 is a diagrammatic representation of the above.

Table 2 provides details on how this model can be operationalised.

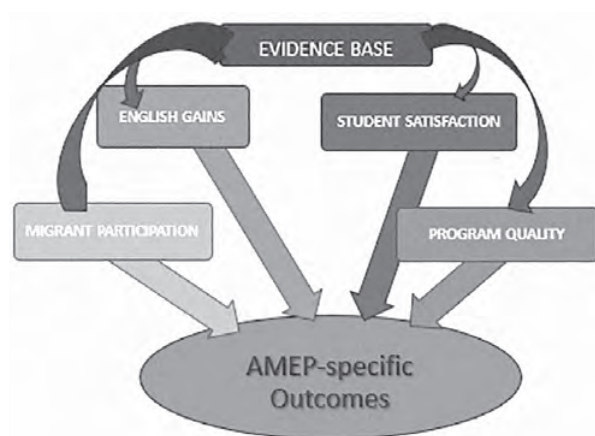


Figure 2: An Outcomes-Focused AMEP

In contrast to the Outcomes-Based Payment Model, the key features in this approach are that it:

- rests on documenting providers' performance on *the full range* of elements that constitute a quality English language program for adult migrants – it is therefore resistant to gaming
- uses *evidence-based benchmarks* to evaluate provider performance
- does not contain *financial (dis!)incentives* that affect provider incomes and therefore skew decisions about class sizes and composition, the focus of teaching, and teachers' employment and working conditions
- would be *cheaper to operate* because of less administration, a reduced need for intensive compliance auditing, and a less complex data management system
- allows the relationship between AMEP-specific outcomes and wider national goals to be *validly, reliably and independently researched*.

It is difficult to understand why the Department and its Minister might be resistant to implementing this approach to determining and assessing AMEP outcomes. Their apparent resistance prompts the following questions:

- Why are policy makers afraid to ask the relevant questions about the AMEP and provider performance?
- Does it suit successive Immigration Ministers to make the AMEP a scapegoat for other policy failures?
- Do periodic scares about migrants' poor English serve useful political purposes?
- Does the lack of consistent, long-term evidence about the AMEP's performance allow funding cuts to be rationalised when needed?
- Or is it simply that – despite occasional accolades from Ministers when it suits them – no government of any stripe cares about what actually makes the AMEP work?

These questions are legitimated by the fact that, since the AMEP began in 1948, no consistency has existed in any specification or measure of AMEP outcomes in publicly available AMEP reviews. It is currently impossible to evaluate the performance of the AMEP or individual providers in any objective, valid and reliable way.

The crux of the decision-making to determine the future of the AMEP lies in whether those responsible for it wish to change this situation.

Table 2: How AMEP Outcomes can be operationalised and measured

Outcomes	What should be measured?	What would count as success?
1. Participation	The number of adult migrant English language learners (i.e., those with less than “vocational English”) who participate in the AMEP.	Achieving or exceeding evidence-based benchmarks for <i>enrolments</i> and <i>retention rates</i> based on (1) long-term AMEP data on enrolments & retentions, (2) benchmarks established for Outcome 2 ^a , and (3) extrinsic factors, notably labour market data. See Outcome 5.
2. English language gains	1) English entry & exit levels of those who enrol and stay in the AMEP for at least, say, five weeks. 2) Learner achievement of competencies in the AMEP curriculum (viz. the <i>EAL Framework</i>).	Achieving or exceeding evidence-based benchmarks for learner gains in the national AMEP curriculum for different learner cohorts in relation to (1) their English entry levels (2) previous education (3) age (4) experience of torture & trauma, (5) mother tongue/first language, and other recognised factors that impact on language learning. See Outcome 5.
3. Student satisfaction	AMEP student responses to validly and consistently designed and administered survey questions about their AMEP experience in relation to national goals, personal confidence & quality of teaching.	High satisfaction levels in relation to personal confidence, AMEP quality and its contribution to national goals. See Outcome 5.
4. Program quality	Assessment of each provider’s performance on an A–E rating scale against a comprehensive, relevant and agreed set of program standards, for example, the NEAS 2009 <i>AMEP Manual Standards and Criteria for AMEP Providers</i> . ^b	Providers performing at A or B level according to independent assessments of performance against these standards by experts in program delivery, including teaching English to adult speakers of other languages.
5. A robust and credible evidence base that supports the AMEP overall and Outcomes 1-4 in particular.	The overall research base would not be measurable in any meaningful way, but specific research questions will include measurements that should be clearly valid and reliable. Measures of Outcomes 1–4 will be valid and reliable if and only if benchmarks are based on a robust evidence base.	The evidence base meets the following criteria: <ul style="list-style-type: none"> • Sound evidence supports the benchmarks for Outcomes 1-4 and are consistently applied from one contract to the next. In-depth independent research: <ul style="list-style-type: none"> • shows how learners’ AMEP experience promotes the national goals served by the AMEP • pursues both specific and more general questions about the AMEP, its existing and potential students, and the Program’s contribution to national goals. The evidence base supporting the AMEP is transparent and accessible to examination in the public domain.

Notes. ^aThat is, retention benchmarks will vary according to the factors that determine rate and level of progress, which, in turn, relate to previous English proficiency and level of schooling. ^bThe NEAS AMEP Standards were developed following a recommendation from the Auditor General in 2001. They provide detailed specifications for the following 7 Standards: Premises, Professional & Administrative Staff, Educational Resources, Program Delivery, Support Services, Program Evaluation and Program Promotion.

So, what should providers be paid for and how? The problem

It is difficult to imagine how the Home Affairs AMEP Policy Team – who have read the reports and submissions listed above, and initiated, conducted and participated in numerous well-run and thorough consultations – could have concluded that tying payments to specific outcomes would improve the AMEP. In fact, the intention underpinning the Outcomes-Based Payment Model has nothing to do with promoting substantive outcomes from the AMEP.

Rather, the Model's aim is to solve the problem created by reforms to the Program in 2021. Restrictions on AMEP eligibility were relaxed as follows:

- Tuition entitlements are no longer limited by tuition hours (previously 510 hours with possible extensions) but now are determined according to the learner's English language level.
- The previous low "functional English" level that determined entitlements has been replaced by a higher level, viz. "vocational English" (which is defined as ACSF level 3, IELTS 5.5 or equivalent).²
- Time limits on the registration, commencement and completion of tuition entitlements were removed for adult migrants who were in Australia on or before 1 October 2020.

From 1992 to 2021, these tight restrictions on eligibility were how governments contained AMEP costs. The restrictions have been repeatedly criticised since the moment they were implemented, including in some of the reports listed above. They substantially inhibited the AMEP's capacity to raise adult migrants' English proficiency. The 2021 changes to eligibility are welcome, necessary and long overdue.

However, the problem now is that relatively open-ended access to the AMEP perversely incentivises providers to do little or nothing to assist learners to improve their English. The Outcomes-Based Payment Model is a seemingly straightforward solution to this problem. It pays providers to progress students out of the AMEP as fast as possible. From this perspective, other adverse outcomes are irrelevant.

ACTA's approach offers an alternative solution. Unlike the simplistic and dishonestly named Outcomes-Based Payment Model, ACTA's proposal is directed to substantive, credible and appropriate AMEP outcomes. It is more nuanced and is also ideologically neutral – it does not locate the AMEP in a

marketplace where educational outcomes are units for sale by pieceworker teachers.

Basic principles

The AMEP payment system should derive from a comprehensive, coherent, rational and transparent approach to the Program's operation. No single element or component should be remunerated in a way that displaces or unbalances others.

Such a payment system would:

- pay providers for *delivering* the AMEP
- have the government bear some of the risk in delivering classes to students with the characteristics and vulnerabilities for whom the AMEP caters
- reduce incentives for rorting by creating income stability for quality providers
- avoid the need for complex "cohort payment adjustments" that are also subject to rorting
- function separately from performance management.

Performance management would:

- be based on *evidence-based benchmarks* for the Outcomes 1-4 listed above
- *support, encourage, govern, evaluate and report on* individual provider performance against these benchmarks
- *carefully and regularly examine* individual provider performance against these benchmarks to detect attempts to rort the payment system
- *develop, refine and evaluate* these benchmarks to ensure they are valid, reliable, consistent and evidence-based, including from one contract period to the next
- *not be driven by specific incentives*, especially financial incentives.

Towards a viable payment system

Provider payments should include the following main elements.

Set-up costs

The funding model should include set-up costs based on an analysis of data from previous contracts.

Ongoing payments

These should be a *fixed per capita amount per term* (according to delivery mode, e.g. fulltime/part-time/distance learning etc.) based on the number of students enrolled and attending in the first two weeks of the term.

What constitutes a *student exit* from a Centre's program, and triggers cessation of the payment for that student, should be specified.

Payments should be made irrespective of whether a student attends every lesson but individual attendance records for each hourly class should be strictly maintained, reported monthly to the Department, and audited using benchmarks for Outcome 1 above and program standards as per Outcome 4. Payments should be capped to assume class sizes of no more than 20 students per term to prevent stacking classes and fudging attendance and staffing.

Payments should be monthly to maintain cash flow.

Special purpose grants

Providers should be able to apply annually for grants for special initiatives, as is proposed through AMEP Connect. Evaluation of provider performance using these grants should be against ACTA's proposed Outcomes 1-5 above.

Student support (childcare, counselling & pathway guidance, volunteer tutor scheme)

These various supports are integral to the effectiveness of the AMEP. They should attract their own separate funding. Restoration of a comprehensive, quality AMEP counselling service is fundamental to assisting AMEP student to access further training and employment.

Long-term contracts

The AMEP's contribution to national goals will be furthered by contracts that explicitly seek to promote adult migrants' participation in the AMEP, improve their English, and provide a satisfying experience in a quality English language program. An essential ingredient in promoting these outcomes is stability of provision.

The payment system proposed above would provide the requisite stability in day-to-day delivery of the AMEP. However, long-term stability is equally essential. It allows providers to:

- plan ahead
- employ and attract qualified, experienced quality teachers by offering them reasonable security of employment and fair working conditions
- establish and maintain quality facilities and infrastructure

- cope with inevitable fluctuations in student enrolment, attendance, retention, relocations and exits
- cater for a range of learners from fast-paced high achievers to slow-paced vulnerable learners and those with special needs
- provide classes at hours and with content that responds flexibly to local learner needs, aspirations and situations
- innovate in all aspects of AMEP delivery, development of teacher resources and collaboration with other providers.

Clear and repeated evidence shows that the five Outcomes proposed in this article are seriously undermined in the contract transition process.

For example, *student participation* drops significantly when new contracts begin. Most recently in 2017, existing enrolments dropped by 46% and were not replaced by new ones. Similarly, in the previous contract change, enrolments dropped by 38% (Social Compass, 2019, p. 12). Notes from the 2019 ACTA Sydney Forum on the AMEP Evaluation explain why:

It's a problem when students move from one provider to another when a tender is lost or gained. Students get very stressed about the disruptions, going to a new place, etc. etc. Some drop out. They have already experienced major disruptions in their lives and so the impact can be large. Students from trauma backgrounds experience disruption and uncertainty – just getting comfortable in one place and then everything changes and they have to go to the new places. They suffer again. The disruption has far-reaching consequences for students, for example with childcare arrangements. (ACTA et al., 2019, p. 11)

Contract changes also significantly undermine *program quality* and *student satisfaction*. A teacher described her experience with a new provider in 2017:

There was no staff room ... no student counsellor to handle students who were agitated at the lack of facilities. No dedicated workspace or bank of computers for teachers to use. There was one office with two computer terminals that were constantly in use by others. Teachers were allowed to use Google Chromebooks but these did not have a printing function, so the most efficient way to do class prep was to save lesson plans, handouts etc to Google

Drive and then print them from home, then bring them back the next day to photocopy. ... On the first day there were no toilets/kitchen available for students to use and they were told to go across a busy road and use the public library across the street. There was nothing in the way of recreational facilities for students. ... Classrooms had to be built during the first few weeks which meant many students had to suspend their studies while construction was going on. ... No smart boards, had to haul in a projector and set it up in a cramped classroom. Admin was essentially a single desk in the foyer. (ACTA, 2019, p. 80–81)

These transition problems have existed since competitive contracting began in 1996. An Audit of the AMEP found that:

Planning for contract succession has not been sufficient or adequate to ensure that there is a smooth, efficient and effective transition at the end of the contract for either an extension of the existing contract with any revised service levels, or for selection of a new provider. (Australian National Audit Office, 2000-2001, p. 15, para. 19)

Despite assurances that subsequent transitions would be smooth, this has *never* occurred.

The outcomes focus proposed in this article offers a solution. Providers that can demonstrate a consistently high level of performance against Outcomes 1 – 5 should be assured of holding their contract and having it renewed, subject to review, say, every three to five years.

Conversely, contracts should include a clear and explicit provision that poor performance against the benchmarks for these Outcomes (for, say, two years) will incur a request to show cause and likely contract termination.

More than any payment or bonus for a discrete outcome, a solid assurance of contract stability that rewards quality performance – and the real threat of losing contracts if performance is poor – will truly drive substantive AMEP outcomes. This system would also be more efficient and cost effective than universal tendering for shorter-term contracts awarded on criteria that bear little if any relation to ensuring quality provision.

Conclusion

The policymakers responsible for the AMEP, including the Minister, receive fixed, regular salaries for doing their work. These payments do not vary according to performance of a discrete item in their contracts, for example, the number of meetings attended, much less for what is specified as “success” (or its opposite) in any single duty. Regular salary payments are separate from procedures used to evaluate performance and hold public officials to account: public servants are subject to regular and comprehensive performance reviews that determine their career paths and continued employment. It is less clear how Ministers are held accountable.

A proposal to pay policymakers according to their performance of a given duty would attract public scorn and outrage. Corruption and distortions would be inevitable. Why then have policymakers proposed that AMEP providers should be paid this way?

The inevitable and real outcomes of the proposed AMEP provider payment system would be:

- meaningless and compromised “unit completions”
- intense and ultimately ineffective, self-defeating compliance auditing
- escalated administration
- no plausible or credible method for evaluating provider and AMEP performance.

In contrast to incentivising these adverse outcomes, the payment system should remunerate providers for delivering the AMEP. Contracts should be awarded to those with demonstrated capacity to meet high standards. These contracts, including the payment system, should support stable short- and long-term provision. Payments should be separate from procedures for evaluating the achievement of specific outcomes. The payment system should not have the potential to corrupt or compromise outcomes or to destabilise the Program by incentivising any single outcome.

The Outcomes-Based Payment Model has *no* basis in the previous five years of discussion about the AMEP, at least in the public domain. It will deliver outcomes that are irrelevant or directly contrary to the national goals that the AMEP was set up to serve.

This Payment Model is so contrary to the goals espoused by Ministers Coleman and Tudge for reforming the

AMEP that it calls their stated intentions into question. The Model is clearly directed to solving the (real) problem of providers rorting recently increased eligibility for the AMEP. Yet, all it does is replace this rort with others. It will be a tragedy if AMEP reform were thwarted by this corrupting payment system.

In pursuit of real reform, ACTA has proposed five valid outcomes to which the AMEP and individual providers can reliably be held to account: participation, English language gains, student satisfaction, program quality standards and the development of a robust evidence base. These outcomes are not “widgets” for purchase in an educational marketplace. Rather, they are outcomes that would enhance the AMEP’s contribution to migrant settlement, their access to education and employment, their individual and group wellbeing, and Australia’s vibrant and cohesive society.

Helen Moore, AM, PhD, is Vice-President of the Australian Council of TESOL Associations (ACTA). Her professional experience was mainly as a TESOL teacher educator at La Trobe University. Since retiring, she works mostly on assisting ACTA’s advocacy especially regarding the AMEP. Recently, together with co-chair Liz Easton (President, ATEsol NT) she set up the ACTA Consultancy Group on Indigenous EAL/D.

Notes

- 1 In the earlier consultation paper, these items were said to be “outputs”. In this author’s view, these distinctions are rhetorical distractions and should not be accepted at face value.
- 2 ACSF = Australian Core Skills Framework. IELTS = International English Language Testing System.

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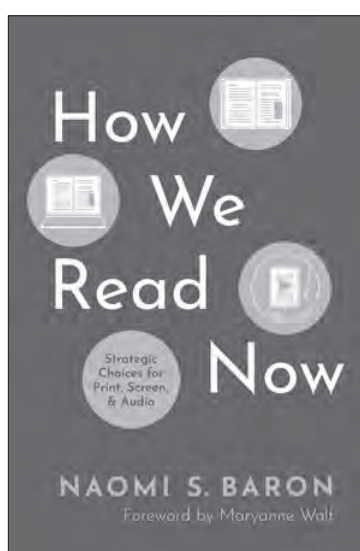
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How We Read Now: Strategic Choices for Print, Screen, and Audio

by Naomi S. Baron

reviewed by Liane Hughes



Naomi Baron's book takes a deep look at how we read, comparing print and digital texts and also considering how we consume texts in audio and video. The focus is very much on reading for learning and, though the emphasis is on school-aged children, there is a lot of discussion about research done with adults, mainly university students. There is no significant discussion of adult literacy students specifically, nevertheless, many teachers in this field would find the book interesting and relevant. There is certainly useful discussion about reading, in particular about what works for students with reading challenges.

A well-known academic in the field, Naomi Baron has been researching reading for decades. The book gives a comprehensive survey of current research about reading and she also examines the history of reading. For example, she reminds us that the move away from an oral tradition in education is relatively recent; universities only moved to written exams in the 1800s. Also, while audio books and podcasts may feel like recent developments, they have their beginnings in institutes for the blind producing sound recordings of books for soldiers blinded in World War I. The historical survey is presented in a very accessible and engaging way.

Baron analyses in detail the relative benefits of using different types of texts with students. Recent research continues to support the idea that many students prefer to read longer, complex texts in print, and will comprehend more (and possibly become less distracted) if they do.

While convenience and cost often dictate the decision to read digitally, for some students digital texts, or audio or video, can be more engaging and more accessible. In particular, these technologies may provide useful alternatives for students with reading challenges such as dyslexia or limited working memory capacity, or for second language learners. There is, of course, no one best way of reading.

One of the main ideas of the book is that we tend to read more quickly, and possibly more shallowly, when reading digital texts. Baron quotes Lauren Singer Trakham: "There is something about reading digitally that seemingly increases the speed at which students move through the text and this processing time translates into reduced comprehension".

Baron also investigates the idea of the "digital reading mindset" and whether it is affecting how we approach print texts. A digital mindset is about reading quickly, skimming and scanning, and often the purpose of reading is for entertainment. It has a focus on information rather than concepts and offers opportunities for multitasking (and distraction).

One of the joys of this book is that the structure and presentation reflect the fact that it's been written by an expert in reading for learning. The chapters are clearly divided into meaningful sections that are easy to find and return to. At the beginning of each part is a set of questions to consider as you read; at the end of each chapter there is a summary of the key learning points.

Even better for teachers is the focus on practical, research-based strategies for our students. Experienced teachers will be familiar with many of the recommended active reading

strategies such as note-taking (solo or in groups), quizzes, writing summaries or drawing mind maps of content; it is validating to know these methods we teach to our students are supported by current research.

Baron points out that writing notes by hand may help students to slow down while they are reading online. Certainly Baron sees it as important to overtly teach students to navigate online, to search out and evaluate sources and to synthesise ideas with previous knowledge and draw ideas together. I found her discussion of confirmation bias interesting in terms of evaluating sources: we tend to accept information that confirms our world views and we resist ideas, news or facts that go against our assumptions about ourselves or the world.

She also advocates talking to students about the need to have a clear idea of your reading goals for a given text, and how different reading goals require different levels of mental focus, and possibly different mediums. When reading digitally, and also while watching videos or listening, we have to be aware of the tendency to skim. We need to remember to refer back, to re-read sections, as speed is not always best. Another important strategy is to take stock of your reading environment: to think about closing other windows or muting notifications.

The sections on audio and video gave me some new ways to think about how these media work in learning. Baron explains they are both firmly entrenched in our culture for entertainment, but there is little research on how effective they are for learning. For students with reading challenges, such as dyslexia, research has definitively

proved a combination of audio and text to be useful so there are definitely indications that incorporating more audio and video into our teaching is worth trying.

While video and audio can be engaging for many students, we need to be aware of the pitfalls. Students are less likely to review audio and video, and issues of mind wandering and multitasking can be greater than when reading. Although students may prefer video, it is likely many of them will remember and understand less than if they read. One suggested way of keeping students engaged and focused is to introduce intermittent interactive activities into videos. Also, having visual prompts while listening – such as viewing slides while listening to a lecture – can really improve retention and comprehension.

Naomi Baron does not prescribe particular reading mediums. Instead, she lays out the options, explaining their pros and cons in her easy to read, conversational style. Digital texts, video and audio are here to stay, and this book gives some great insights into how we can work with our students to help them get the most out of all texts.

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