



16th December, 2021.

The Hon Alex Hawke
Minister for Immigration, Citizenship, Migrant Services and Multicultural Affairs
House of Representatives
Parliament House
Canberra
ACT 2600

Dear Minister,

Re: Adult Migrant English Program – Proposed AMEP Funding Model

On behalf of the Australian Council of TESOL Teachers (ACTA), we write to request an urgent meeting to discuss the recently released *AMEP Consultation and Funding Model Comparison Report*.

We believe such a meeting is warranted because, if implemented, two centrepiece proposals in this paper will be immensely damaging to the AMEP, viz.:

1. provider payments (nominated at 20%) contingent on students' successful completion of "units of competency"
2. an exponentially increased administrative burden, and costly compliance auditing, for teachers, providers and the Department in monitoring, reporting and verifying attendance, "milestones", "loadings" and "nominal hours", and claiming payments for them.

We have no faith that the proposed new data management system can be created and trialled in the time available, or that it will be efficient and effective in accommodating this burden.

These two crucial proposals follow from more than three years of intense scrutiny of the AMEP.

Key reports include those by the Joint Standing Committee on Migration (December, 2017), the Scanlon Foundation (June, 2019), Professor Peter Shergold (November, 2019), the Settlement Council of Australia (February, 2020), the Centre for Policy Development (August, 2020), and a commissioned review of the AMEP by Social Compass (August 2019).

We are not aware of *any* proposal in these reports – by even the most vehement critic of the AMEP – to tie provider payments to student assessment outcomes.

Rather, almost every report on the AMEP criticizes the Program – and especially the 2019 contract – for the excessive emphasis on student assessment, compliance and administrative red-tape, because these have deflected teachers from teaching to meet their students' settlement, training/educational and employment needs and aspirations. The above proposals will multiply these problems.¹

¹ The proposed "hybrid" model creates a greater administrative nightmare than is currently in place (which is difficult to imagine!), because it interlocks and complexifies the worst of previous reporting requirements on assessment and attendance. Payments for "pre-certificate" students (payments for every 10 hours tuition) must be differentiated from those for other students (payments based on completing a competency unit's nominal hours, which are not the same as

Since the 2019 contract was proposed, ACTA has freely provided disinterested quality advice to Parliamentary and Government authorities on the extreme difficulties it created for providers and teachers in delivering effective English language teaching (August, 2016; May, 2017; October, 2017; May, 2018; March-April 2019; two in May 2019; November 2019; December, 2019; June, 2020; July, 2020; September, 2021; three in August 2021). We also hosted two national on-line forums with the Co-ordinator General for Migrant Services, Ms Alison Larkins (November, 2020 and March 2021). We ran face-to-face forums for AMEP teachers in Sydney, Brisbane and Melbourne to support the 2019 Social Compass AMEP Review, and five on-line forums on the May 2021 Discussion Paper *Reform of the Adult Migrant English Program* (run separately so as to promote discussion by AMEP teachers in Perth, the ACT, Victoria, NSW and Qld, and South Australia). Our representatives also met twice with advisors to your predecessor, Minister Coleman, once with Ms Larkins and several times with the Home Affairs AMEP team. One of the signatories to this letter was a member of the AMEP Advisory Committee and wrote four detailed responses to requests for input. Our submissions, written reports, letters and meetings have drawn on in-depth and unique knowledge of the AMEP, its students and teachers, and provided authorities with quality information and insights that were otherwise inaccessible. ***Not one*** of these interactions has advised (or implied) anything like what is now proposed. Now described, these proposals are universally condemned.

The Department of Home Affairs AMEP Vision Statement at the end of 2019 included the following commitments:

High quality

- *AMEP is the best program of its kind in the world.*
- *Design and delivery are supported by evidence-based policy on teaching and adult learning, English as an additional language, digital literacy, numeracy and settlement.*
- *The program is underpinned by a strong quality assurance and performance framework.*
- *Outcome data is used for continuous improvement.*

Measuring success

Students and teachers have a shared understanding of the outcomes they will achieve. They set a goal on commencement, work towards it, and measure and celebrate achievement.

ACTA has had faith in these statements and we have similarly encouraged AMEP teachers. In contributing to ACTA submissions, AMEP teachers' hopes were raised that the deep crisis created by the 2019 contracts would be reversed. The title of the second ACTA forum with Ms Larkins in 2021 was "*Listening to AMEP Teachers*". Both forums were marked by goodwill and hope.

The above proposals destroy this hope and run counter to every commitment in the 2019 AMEP Vision Statement. They insult teachers' goodwill and integrity.

ACTA is acutely aware of the criticisms of the AMEP by your immediate predecessor in the Immigration portfolio. His criticisms rested on the legitimate question of what taxpayers can expect from the AMEP for the resources expended. In his speech to the Menzies Centre in February 2020, the Minister stated: "*we are ... 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.*"

attendance hours). Providers/teachers must also monitor and report on actual attendance. None of these payments incentivise student attendance but they do incentivise providers to continue running large classes to ensure as many payments as possible for each teacher they employ. Large classes with very different English levels are a major source of student complaints and reasons given for withdrawing. Even if the data management system can manage this complexity, providers will be responsible for ensuring that the input can be verified. That will entail increased record-keeping by teachers and checking by auditors, all of which will deflect human and material resources/energies from teaching English. The evidence is clear that students are incentivised to attend classes by quality teaching that targets their learning needs and English levels.

If the above proposals are implemented, the question “what is the AMEP achieving?” will be unanswerable. A corrupting and perverse incentive will lie at the core of the AMEP’s operations. A monetary incentive – no matter if 20% or 1% of provider payments – contingent on students successfully achieving “units of competence” will destroy the credibility of these achievements. The only clear outcomes will be dubious certificates, increased administration and large (and otherwise unnecessary) expenditure on compliance checks.

Minister Tudge’s and everyone else’s previous questions about the AMEP will then be well founded.

ACTA fully supports close monitoring of AMEP outcomes. Our submission on the 2021 Discussion Paper lists substantive and appropriate AMEP outcomes and describes how to measure and monitor them. In essence, providers should be paid to deliver English language tuition. Evidence-based performance benchmarks should attach to substantive and relevant outcomes. Incentives (and their opposite) should rest on performance reviews to determine how providers are meeting these benchmarks. Contracts should explicitly include provision for termination of individual contracts for consistent and unexplained under-performance.

Currently there are *no* benchmarks – at least in the public domain – which allow provider performance (individually or collectively) to be evaluated in relation to substantive AMEP outcomes. Likewise, it is impossible to compare and evaluate the outcomes from one AMEP contract with those from any other. From one review to the next since the AMEP began in 1948, there has been no consistency in determining – much less measuring and evaluating – the Program’s outcomes.

These two proposals will continue and deepen this failure. Rather than incentivising improved performance, they will obscure ways of determining anyone’s performance. Most disturbingly, they offer *no* remedy for poor performance.

These proposals will place teachers under huge pressure from their employers to push students through as many tests as possible. They disincentivise consolidating the superficial learning that enables passing a test. Employers will justly complain of AMEP “graduates” poor grasp of English despite their paper credentials.

The provider payment incentives run directly counter to teachers’ professional commitment to teaching and assessing on the basis of their disinterested evaluation of their learners’ needs and aspirations. But, irrespective of individual teachers’ commitment and professionalism, their credibility – together with the credentials delivered by the AMEP – will be undermined by this perverse incentive.

Given this threat to the substantive outcomes you seek from the AMEP, we hope you will agree to yourself or an advisor meeting with us before you reach a final decision on these matters. Ms Corrigan is based in Melbourne and Dr Moore is in Canberra. We would prefer to travel to a face-to-face meeting, although meeting on-line would also be welcome.

Yours faithfully,

Margaret Corrigan
President,
Australian Council of TESOL Associations (ACTA)

Helen Moore, AM, PhD
Vice-President,
Australian Council of TESOL Associations (ACTA)

cc. Ms Alison Larkins and Ms Ali Mond.