



AUSTRALIAN COUNCIL OF TESOL ASSOCIATIONS

FEEDBACK ON

**The ACER Review of the
Australian Core Skills Framework
and
Digital Literacy Skills Framework
and
relevant assessment tools**

February 2023

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1. Introduction

The Australian Council of TESOL Associations welcomes the opportunity to provide feedback to the Department of Education, Skills and Training on the ACER *Review of the Australian Core Skills Framework and Digital Literacy Skills Framework and relevant assessment tools* (henceforth the Review).

ACTA is the peak professional body concerned with the teaching of English to speakers of other languages (TESOL). The Council comprises representatives from State and Territory TESOL associations, including their presidents. Association members include teachers, consultants, curriculum developers, teacher educators, other academics and researchers in the TESOL field in tertiary, VET and community education, and school and pre-school settings.

This response has been prepared in consultation with the ACTA Adult ESOL Consultancy Group, which consists of AMEP provider managers and teachers, teacher educators and resource developers.

2. ACTA's position on the ACSF

ACTA has consistently articulated the arguments and evidence that the ACSF is unsuitable for use with **Indigenous, migrant and refugee learners of English as an additional language or dialect (EAL/D)**.¹ However, we also accept that it is no longer feasible or desirable, for historical and pragmatic reasons, to waste effort and resources in attempting to reverse its *current* restricted use with such learners. We do not support further development or extension of the ACSF for EAL/D learners beyond the uses listed below. We believe that the resources and effort entailed in the Review's proposals would be more productively directed to improving curriculum, teaching materials and professional development for TESOL teachers, all of which improvements should extend well beyond the current focus on compliance and meeting narrowly framed Key Performance Indicators (KPIs).

Regarding the use of the ACSF in the context of English literacy and numeracy teaching and learning by **English mother tongue speakers and those with high fluency in everyday spoken English**, we defer to colleagues in the adult literacy and Foundation Skills fields. We suspect that at least some may agree with ACTA on confining use of the ACSF as listed below and on using and developing appropriate curriculum as the basis for developing other aspects of assessment, reporting and certification.

Specifically, and in so far as the ACSF is used with Indigenous, migrant and refugee adult learners of English as an additional language, ACTA's position is as follows.

¹ The most detailed analysis is in section 6 of ACTA's submission to the 2019 Social Compass Review of the AMEP: [ACTA submission to the AMEP Evaluation final.pdf \(tesol.org.au\)](#). But see also (in chronological order starting with the most recent):

ACTA submission 81 to the Parliamentary Inquiry into the Importance of Adult Literacy, [Submissions – Parliament of Australia \(aph.gov.au\)](#): section 2, p. 16ff. & Appendix A.

[ACTA-Letter-to-Acting-Immigration-Minister-Tudge.pdf \(tesol.org.au\)](#), pp. 5-6

[Forum to discuss the 2019 evaluation of aspects of the AMEP \(tesol.org.au\)](#)

[607 Composite notes from Sydney AMEP Forum.pdf \(tesol.org.au\)](#)

[609 ACSF slides Melbourne.pdf \(tesol.org.au\)](#)

[598 ACTA submission to the VET Review - January 2019.pdf \(tesol.org.au\)](#) See especially Appendices 3 – 7.

[Problems-in-the-AMEP-SEE-Program-25-May-2018-an-ACTA-Background-Paper.pdf \(tesol.org.au\)](#) See section 1.1

[ACTA-submission-on-draft-RFT-for-the-AMEP-final.pdf \(tesol.org.au\)](#), see p. 19ff.

1. The ACSF, along with the ISLPR (International Second Language Proficiency Rating Scale) or other recognised English proficiency scales or assessment systems, can be retained in assessing **initial eligibility** for the AMEP, SEE and Foundations Skills Programs, and to determine **placement in classes** at approximately the same English level.² All subsequent assessments should be based on attainment in the taught curriculum.
2. The ACSF should **not** be used to identify ‘capacity to benefit’ for EAL/D learners or, indeed, any VET learners³ – this judgement should be made by well-qualified and experienced TESOL (or LLN) assessors based on a range of relevant evidence.
3. The ACSF can be used, along with the ISLPR (International Second Language Proficiency Rating Scale) or other nominated English proficiency scale or assessment, for **benchmarking** the EAL Curriculum Framework to meet VET accreditation requirements.
4. Reporting on gross English literacy levels in the general adult population should make clear **the proportion of learners of English as an additional language or dialect in any sample** and should *either* report on their **English proficiency levels** using a recognised EAL or EAD assessment measure *or* not include EAL/D learners in the sample.⁴
5. The ACSF is unsuitable, and should **not** be used, in **assessing the progress or achievement of outcomes** by adult English language learners in the AMEP, the SEE Program or with Aboriginal and Torres Strait Islander learners of Standard Australian English.⁵
6. The proper vehicle for assessing learner gains in programs is **via the curriculum** that they are studying.
7. The ACSF is unsuitable, and should **not** be used, for **assessing AMEP or SEE Program outcomes and achievement of KPIs** in those Programs.
8. The ACSF is **unsuitable for modification or extension** for use with Indigenous, migrant or refugee adult English language learners and, on no account, does ACTA support recommendations in this direction.
9. The ACSF should not be used as a basis for **developing actual curriculum** for use with Indigenous, migrant or refugee adult English language learners, although some aspects of it may suggest useful detail.
10. The appropriate vehicle for “acknowledging the [linguistic and] cultural diversity” of EAL/D learners is through curriculum specifically designed to meet their learning needs.
11. Certification and reports used to **access on-going pathways into mainstream education, training and employment** should be derived from attainment in the curriculum a person

² If required by authorities, these assessments are/can be benchmarked by these authorities against ACSF levels.

³ Review p.28.

⁴ ACTA acknowledges that determining or locating “recognized” EAL measures is problematic. The tests listed for international visa purposes are inappropriate for local use in Australia: [English language visa requirements \(homeaffairs.gov.au\)](http://homeaffairs.gov.au). The ISLPR comes closest to being appropriate for adult migrants. The ABS uses self-assessments, which is probably the most optimal in the current situation. We are not aware of any assessment tool appropriate for use with speakers of New Aboriginal languages or Aboriginal Englishes. See also footnote 20.

⁵ The requirement to use the ACSF every term to re-assess learners in the SEE Program to measure learning gains is a continued source of dissatisfaction for both students and teachers. It entails double assessment, because assessment against the curriculum is also required by course accreditation authorities. The result is that “teaching to the test” dominates pedagogy and prevents holistic approaches to teaching macro-skills across different curriculum units.

has studied (which can be benchmarked to ACSF levels) and/or assessments relevant to the on-going pathway.

In regard to First Nations learners of English as an additional language or dialect and learners of literacy in Standard Australian English, ACTA believes that new culturally and linguistically appropriate approaches are required.⁶ The development of approaches appropriate to diverse Aboriginal and Torres Strait Islander contexts extends well beyond considering any specific framework for assessment and reporting on English literacy learning. A complete, bottom-up review of the SEE and Foundation Skills programs that examines and seeks to rectify the causes for the lack of take-up of these programs, especially in remote Indigenous contexts, is required.⁷ This review should provide the underpinning for specific recommendations on assessment and reporting.

3. ACTA's response to the Review's recommendations

The letter from Louise Wignall to stakeholders (6 December, 2:17pm) specifically requests “feedback on the recommendations to inform future updates to the ACSF”. This section lists ACTA's responses. Subsequent sections will elaborate on the rationale underpinning these responses.

Recommendation 1: Consider the Digital Capability Framework (when available) as a replacement for the DLS

We endorse Recommendation 1 (a): *Do not introduce digital literacy into the ACSF as a sixth core skill.*

We are not in a position to comment on Recommendations 1 (b) and 1 (c) in the absence of the new Digital Capability Framework but endorse its general direction.

Recommendation 2: Continue to maintain the ACSF as the pre-eminent Australian framework for LLN

As ACTA has consistently maintained in all our submissions and statements regarding the ACSF, we do not believe it is useful, valid, reliable, fair or quality practice when applied to the teaching, learning

⁶ The starting point should be a holistic and comprehensive understanding of the place of Standard Australian English in the ecology of languages use and identity for Aboriginal and Torres Strait Islanders, particularly in remote contexts. See [National Indigenous Languages Report | Office for the Arts, Department of Infrastructure, Transport, Regional Development, Communications and the Arts.](#)

Also:

Angelo, D. (2021). Creoles, education and policy. In U. Ansaldo & M. Meyerhoff (Eds.), *The Routledge handbook of pidgin and creole languages* (pp. 286-301). London/New York: Routledge.

Angelo, D. (in press) Language contact and contact languages. In C. Bowern (Ed.), *Australian languages handbook*. Oxford: Oxford University Press

Shnukal, A. (1985). Why Torres Strait ‘broken English’ is not English. In Christie, M.J.(Ed.), *Aboriginal perspectives on experience and learning: the role of language in Aboriginal education*. Victoria: Deakin University Press.

Also: ACTA's submission to the Productivity Commission review of the Closing the Gap Agreement: [Submission 11 - Australian Council of TESOL Associations \(ACTA\) - Closing the Gap Review - Commissioned study \(pc.gov.au\).](#)

Also: [Submission 20 - Australian National University \(ANU\) and Translational Research in Indigenous Language Ecologies Collective \(TRILEC\) - Closing the Gap Review - Commissioned study \(pc.gov.au\)](#)

Also: footnote 20.

⁷ See Commonwealth Department of Employment & Workplace Relations Background Paper at the request of members of the Foundation Skills Advisory Group (December 2022). *Remote Community Pilots – Interim evaluation*. Embargoed. (The ACTA representative drafting this response has access to this paper because she is a member of the FSAG. She has not circulated it to anyone.)

and assessment of English language and literacy in Standard Australian English to Indigenous, migrant or refugee EAL/D learners.

Consequently:

- we do not accept the assumption in Recommendation 2 that the ACSF is “the *pre-eminent* Australian framework for LLN” if this is interpreted to mean that the ACSF is suitable for comprehensive use with EAL/D learners
- we do not support extending the ACSF to encompass EAL/D learners, as per recommendations 2a(iii), 2a (vii), 2 b(i), and 2c(ii).

We endorse the Review findings of:

... strong consultation feedback from practitioners working in the AMEP and SEE program that requiring a full Indicator gain within a prescribed timeframe was unrealistic for many learners. Additionally, the need to provide multiple pieces of evidence to demonstrate a full Indicator gain was seen as placing an untenable burden on teachers and sometimes driving teaching and assessment practice that does not serve learner needs. (p. 54)

Re 2e(vi)⁸: we are advised that the intention in this recommendation is to remove the burden of reporting against ACSF full indicators and support greater flexibility in demonstrating greater progress against those ACSF performance feature/s that align with the curriculum unit. On this understanding, ACTA supports this recommendation, which accords with our position that the curriculum should be the basis for reporting attainment.

Findings in regard to the SEE Program apply equally to the AMEP:

some SEE providers reported that satisfying the program’s quality assurance processes required atomistic mapping of assessment outcomes against ACSF Indicators and Performance Features. This process was not only considered burdensome but was also viewed as artificially skewing learning and assessment activities towards those that would most effectively provide evidence of ACSF outcomes rather than those that were of value to, and valued by, individual learners. (p. 23)⁹

As stated above, ACTA is opposed to use of the ACSF in this way, and especially with EAL/D learners. We endorse the Review’s caution regarding developing an ACSF numbering system that:

a more clearly numbered ACSF might unintentionally drive forensic auditing behaviour that often works against educational integrity and holistic consideration of learners’ skills. (p. 50)

We therefore do not endorse recommendation 2b (iv) “Develop and apply a consistent numbering system for internal ACSF components (Focus Areas and Performance Features)” (p. 62).

The starting point for the Review did not include the potential for constraining use of the ACSF.¹⁰ Rather than weighing up the strengths and weaknesses of the ACSF, and different options for meeting

⁸ **Recommendation 2e(vi):** Consider the potential for ensuring that all programs that seek to measure LLND progress for reporting/funding purposes enable more varied measures of learner progress based on finer gradations of learner gain within and across ACSF levels.

⁹ See also footnote 5 above.

¹⁰ The Review states:

the roles claimed for it, the Review is confined to advancing claims for extending its scope. The Review minimises, dismisses or is silent about substantive criticisms of the ACSF, including in the section “EAL considerations” (pp. 50-51). The data presented is selective, self-justificatory and defective.¹¹

ACTA suggests that the claims presented in the Review’s recommendations and their cost benefits should be carefully scrutinised. This scrutiny should start from an objective, impartial, expert consideration of the history, *actual* practical uses and future usefulness of the ACSF, as distinct from the various costly expansions the Review proposes.

4. ACTA’s position on the suitability of applying the ACSF in EAL/D learning contexts

ACTA’s reasons for arguing that the ACSF is unsuitable for use with English language learners are, in short, that it inappropriately meshes descriptors of learning outcomes for **two quite distinct learner populations**, namely those learning *English* and those with *English mother tongue oral fluency* who need to develop their *literacy*. The starting points, learning trajectories and learning goals for these two groups are different.

Our position on EAL/D learning draws from the large body of research and evidence into language learning that began the late 1970s and was established in the 1990s as the field of Second Language Acquisition (SLA) research.¹² Like any established discipline, the SLA field includes various positions and controversies. Nevertheless, it is difficult – maybe impossible – to find credible support from SLA research for describing different EAL/D learners’ and English mother tongue speakers’ English and literacy learning pathways within one outcomes-focussed “framework”. The ACSF is based on this incorrect assumption.

Proponents of the ACSF, including the ACER reviewers, *never* draw from the SLA literature and findings in any coherent, systematic, knowledgeable or in-depth way.¹³ Their stance is explained in the Review as follows: “The ACSF is not specifically designed as a framework to describe additional language acquisition” (p. 47).

The aim of the project was to report on how the frameworks [the ACSF and the Digital Literacy Skills Framework/DLSF] are used in the vocational education and training (VET) and adult and community education (ACE) sectors and identify any updates that are needed to ensure they meet the needs of stakeholders. (p. 9).

¹¹ For example (not exhaustive):

- Data on those consulted is not presented in any systematic or transparent way. It is fragmentary and scattered through the document.
- The survey document is not included in the Review. Nor is there any systematic analysis of responses.
- The data presented do not permit an estimation of the real level of professional support for the ACSF and the extent of criticism of it.

¹² A Google search for SLA research publications yields 2,200,000 results.

¹³ The Review reports that:

The ACSF remains a unique instrument internationally. While some countries have developed frameworks and curriculum for particular learner demographics, few have the overarching character of the ACSF – a framework intended for multiple purposes. (p. 11)

The Review does not consider the reasons for the choice to suit particular demographics by some countries. ACTA does not regard the ACSF’s “overarching character” a strength but rather as its fundamental flaw.

We acknowledge that a lack of reference to SLA and assessment research is also a problem with some/most EAL/D curriculum. The remedy is to fix the curriculum (see point 1 in the Conclusion below), not repeat the problem in the ACSF.

In response to repeated criticism regarding the unsuitability of the ACSF for use with EAL/D learners from AMEP and SEE teachers, the ACSF has been modified several times.¹⁴ However, these modifications are piecemeal, just as are the further modifications proposed in the Review's recommendations 2a(iii), 2a (vii), 2 b(i), and 2c(ii).¹⁵ The proposed modifications are, in fact, *impossible* to incorporate in any way that is coherent or grounded in sound evidence. Such modifications would entail a complete transformation of the framework into something else.¹⁶

Extensive criticisms of the ACSF by AMEP teachers followed its mandated use by the Department of Education and Training in the 2017-2021 AMEP contracts. With the removal of previous eligibility restrictions, the AMEP is now the most appropriate Program for adult migrant and refugee English language learners. In line with the list in section 2 above, ACTA endorses the currently restricted use of the ACSF in the AMEP as instituted by the Department of Home Affairs.

Overall, the ACSF provides an unsatisfactory, inaccurate, sometimes incoherent and overly complex picture of various pathways to literacy in English by those for whom it is an additional language or

¹⁴ Some of the modifications made in response to these criticisms (but with no reference to them) are discussed on p. 37 of the Review.

The Introduction to ACSF Pre-Level 1 also makes no reference to EAL/D learners. Nevertheless, in the two illustrative "Scenarios" of likely learners, the first (Binh) is clearly an adult migrant, and the second (Sharlene) would appear to be Aboriginal, since she is "an important figure in her community," has recently "been working on some projects around the education of her people in understanding the nutritional and medicinal qualities of the local vegetation", and "speaks five languages, including some English, but has had little exposure to English reading and writing and little need to learn these skills" ([ACSF PreLevel 1 2017 - Department of Employment and Workplace Relations, Australian Government \(dewr.gov.au\)](https://www.dewr.gov.au) pp. 5-6).

These descriptions exemplify the ACSF's approach to obscuring and disregarding the differences between learning English as an additional language/dialect, including literacy in Standard Australian English, and mother-tongue English speakers learning literacy in English.

¹⁵ For an example of a piecemeal and confused approach, see the Review p. 45. The discussion of phonemic awareness makes no reference to the influence of EAL/D learners' existing phonological systems, conflates this influence with dyslexia, and implies that all EAL learners need to learn how to map sounds to orthography. The latter need will be true of EAL learners with minimal/no previous schooling but it does not apply to those literate in a language other than English (mother tongue and/or the language of schooling). The learner's *existing* phonological system(s) will play a role in acquiring listening and speaking in English but probably less significantly in learning to read English, especially if (as is frequent) a person has learned English at school through methods focused on literacy rather than oral English. The Review's proposed solution is to adapt Pre-Level 1 but this Level assumes no prior literacy in any language.

For another example of piecemeal proposals, see the suggestion that:

It may be useful to work with EAL teachers to develop more explanatory text to accompany the oral communication core skill and to review and refine some of its Performance Features to ensure that learner gain in speaking production and spoken interaction can be separately reported, drawing on the best of other frameworks, such as the CEFR, where these can genuinely add value. Enhanced descriptors would benefit both native and non-native English speakers. (p. 47).

Also:

Without deconstructing the entire framework, it is not possible to revise the theories that underpinned its original development. However, the introduction to the ACSF could be revised to acknowledge more recent theories and approaches and their relationship to adult core skill development.

...

The history of the framework and related theory is of interest to some readers but certainly not all. While it is not advisable to entirely retrofit the ACSF to imply that more contemporary theory informed its development, it is possible to add research references in core skill introductions relating to any added content and expand on these in ACSF Companion Volume material.

Recommendations

2b(iii): Update introductory material for each core skill to ensure readability and reflect any updates to core skill content including references to underpinning theory. (p. 51)

¹⁶ For example, it would begin to look very much like the ISLPR.

dialect.¹⁷ How this problem plays out in practice for AMEP teachers is described at length in ACTA's submission to the Social Compass review of the AMEP, which includes first-hand teacher accounts.¹⁸ We refer the reader to these criticisms, the substance of which remain, despite existing and proposed modifications to the ACSF.

ACTA endorses development of a common curriculum mandated by the Department of Home Affairs for national use across the AMEP, viz. the *EAL Framework*. This curriculum is currently under revision for re-accreditation. We are also concerned that the emerging version requires considerably more effort and resources than is currently occurring to prevent the Framework imposing an inappropriate burden (as did the ACSF) on EAL/D learners and their teachers. We have expressed these concerns to authorities, so far to no avail.¹⁹

Our concerns about the reaccreditation of the *EAL Framework* point to the urgency for directing attention and funding to where it is most needed, namely, in upgrading resources and professional development to support learning, teaching and appropriate assessment and reporting on the achievements of diverse EAL learner groups. Effort, expertise and resources should not be diverted from these priorities by attempting to improve the ACSF, which is inappropriate and superfluous to AMEP needs except in the limited ways listed in section 2 above.

In regard to use of the ACSF with First Nations EAL/D learners, please see section 2 above. The fundamental principle – viz. that EAL learning cannot be conflated with literacy learning – applies. But the starting point must be a consideration of the roles that spoken English, Standard Australian English and literacy in English play – both practically and symbolically – in the lives of individuals and in diverse urban and rural contexts, and in remote communities where Aboriginal and Torres Strait Islander languages are dominant.²⁰ As already stated, the failure of Foundation Skills and the SEE Program to meet the needs of First Nations students requires consideration that extends well beyond the ACSF.²¹

¹⁷ For a detailed explanation, see ACTA submission 81 to the Parliamentary Inquiry into the Importance of Adult Literacy, [Submissions – Parliament of Australia \(aph.gov.au\)](https://aph.gov.au/submissions): section 2, p. 16ff.

¹⁸ [ACTA submission to the AMEP Evaluation final.pdf \(tesol.org.au\)](https://www.tesol.org/au/acta-submission-to-the-amep-evaluation-final.pdf), section 6.

¹⁹ Key Issues in Determining Future Settings for the AMEP forthcoming at [Advocacy – Australian Council of TESOL Associations](https://www.tesol.org/au/advocacy)

²⁰ The National Indigenous Languages Report makes the following distinctions.

Aside from Standard Australian English, **three main language groups** are used and learned by Aboriginal and Torres Strait Islander people in Australia:

***Traditional languages:** These are Australian languages spoken by Aboriginal and Torres Strait Islander people prior to colonisation, and the directly descended language varieties spoken today. Some are strong languages still spoken by children; others are being learned or renewed.*

***New languages:** These Australian languages have formed since 1788 from language contact between speakers of traditional languages with speakers of English and/ or other languages. New languages have historical influences from their source languages, including English, but they are not automatically understood by Standard Australian English speakers.*

***Englishes:** Across Australia there are Aboriginal and Torres Strait Islander ways of speaking English which differ somewhat from Standard Australian English, but which Standard Australian English speakers can more or less understand. These are varieties of English just as American English is a variety of English.*

[National Indigenous Languages Report | Office for the Arts, Department of Infrastructure, Transport, Regional Development, Communications and the Arts](#), p. 17.

²¹ ACTA realises that current funding arrangements, especially in regional areas and small centres, make it financially unviable to offer separate classes with appropriately qualified teachers to EAL/D learners and English mother tongue literacy learners. We believe this situation is generally undesirable, especially for both types of students at lower English and literacy levels. However, this form of provision does not alter our position that learners should be assessed against the taught curriculum and that use of the ACSF should be restricted as listed in section 2 above.

5. Assessment and the ACSF

The Review includes the frequent statement, including in recommendation 2b(ii), that the ACSF is not an assessment tool. ACTA endorses this statement. We also accept the claim that it “can be used to inform assessment design,” with the proviso that it is simply one among many such descriptions.

We offer the following further brief observations.

First, despite this disclaimer, the ACSF has been understood by policy makers, departmental officials, providers, teachers and others to be an assessment tool, and – insofar as it is possible – used and interpreted as such. The Review documents this on-going mis-apprehension: see pp. 28-29 and pp. 31-32. ACTA believes this mis-apprehension is impossible to reverse by simple assertions to the contrary, especially when the ACSF is then described as if it were an assessment system.

Second, also despite this disclaimer and also the Review’s summary of principles drawn from the work of Geoff Masters, a recognised assessment expert (p. 21), subsequent sections of the Review’s discussion of the relationship between the ACSF and its use are unclear and confusing. It appears largely taken for granted that proper assessment principles are applied in the various ACSF uses documented from p. 21 onwards (with the exception of pp. 25-26).

Third, as with its predecessor National Reporting System (NRS), the ACSF construct itself is unclear. It was developed from a range of curriculum documents from completely different contexts, including the Common European Framework of Reference for Languages (CEFR).²² These documents themselves have contested and sometimes unclear theoretical origins and underpinnings. These issues are never discussed by the proponents of the ACSF or in the Review.

Fourth, as with the SLA literature, ACSF proponents have bypassed the extensive literature on language assessment together with local expertise in language assessment, including the Melbourne University Language Testing Research Centre²³ and a key professional association (ALTAANZ).²⁴ The reason given is as cited above, viz. that the ACSF is not assessment tool. Nevertheless, if one of its intended purposes is “as a reference point for undertaking assessments of an adult’s performance of core skills” (p. 27), one would expect that input from language assessment experts might have a place.

The Review does not report on disinterested, expert validation of the ACSF construct. Instead, the Review documents a “roundtable discussion with framework experts” that “considered lessons that can be learned from the experience of framework development and implementation” (p. 3) and “perceptions” drawn from surveys and consultations (pp. 27 ff.).²⁵ Such perceptions are only marginally useful in determining whether the ACSF is fair, valid and reliable (p. 29). In loosely deploying these terms from the assessment literature, the Review demonstrates a misunderstanding of their meaning and how these technical criteria might be applied to the ACSF. We note Recommendation 2e(iv) that a revised ACSF be “triallyed and validated” (p. 20). Given the history of

²² See Review, pp. 11 and 46. ACTA does not endorse the implication that the CEFR’s revisions should be emulated (p. 12).

²³ [Home — Language Testing Research Centre | Faculty of Arts \(unimelb.edu.au\)](http://www.unimelb.edu.au/language-testing-research-centre/)

²⁴ Association for Language Testing and Assessment of Australia and New Zealand [ALTAANZ - About ALTAANZ](http://www.altaanz.org/)

²⁵ The breakdown of respondents regarding teaching EAL/D and mother-tongue English literacy learners is not reported.

the ACSF, section 4 and the four observations above, ACTA has no faith that any such validation would meet standards that we would trust.²⁶

Finally, the claims made in the Review for the widespread use of the ACSF and its status as “an established nationally recognised framework” (p. 11) do not acknowledge that this use is almost entirely mandated through contractual requirements for providers, as distinct from being freely chosen by providers and/or teachers.²⁷ In fact, we doubt if the ACSF specifications of Core Skills, Indicators, Performance Features, Performance Variables, and Domains of Communication are widely or consistently used in any LLN or VET program, simply because their complexity makes it impossible.

6. Concluding remarks

ACTA accepts, as an historical fact, that the ACSF has provided “a common language” for talking about LLN (Review, p. 11). This common language is useful in some contexts, as we have listed in section 2 above.

The ACSF’s common language is used to specify five literacy levels attributed to the general population and some populations of concern, notably remote First Nations communities. The levels range from Pre-Level 1 (low-level performance) to Level 5 (high-level performance). It is doubtful that understanding the meaning of these levels by policy makers, accrediting authorities, most educators and the general public extends beyond the words in the brackets. Nevertheless, common terminology to grade gross levels of LLN need is useful in its own right. The damage is done when subsequent funding and associated provision do not distinguish between different learning needs.

²⁶ We note, for example, the vague (‘program-specific critique’) and selective reporting that is unsupported by statistical evidence or a published reference in the following discussion of feedback on EAL learners:

The robust and positive participation in the forums held as part of this ACER review generated some program-specific critique but in general an overall level of acceptance and support was expressed in regard to the applicability of the ACSF to EAL learners. It is generally viewed as ‘good for using with migrant learners, if you count the pre-level supplement, [as] it allows a pretty accurate snapshot across the core skills and to evidence progress’ (Venuto, 2022).

Through discovery consultations, a specialist program assessor with over ten years’ experience placing students into AMEP, SEE and state-funded LLN programs indicated that the ACSF and the related program assessment tools allowed for ‘useful individual in-depth language analysis and analysis of skills such as learning and numeracy that are not represented in other frameworks’ (p. 45)

²⁷ See, for example:

p. 8:

The ACSF has a long history of informing the content of training packages and units of competency, accredited courses, and entry and exit level advice in related implementation guides.

Also section 2.1, pp. 15-20, p. 44 (where reported criticism is prefaced by “Despite the ACSF being recognised internationally as a comprehensive framework,...”).

p. 62:

While the ACSF is a comprehensive framework and as a result is well-regarded, reference was consistently made throughout consultation to its complexity and size. Those consulted spoke positively of previous government-funded professional development that provided both an introduction to the framework and training for more advanced users. (p. 62)

ACTA was consistently advised by AMEP teachers during its use under the 2017-2021 contract that professional development was limited to compliance with auditing based on the ACSF.

An on-going problem for AMEP and other teachers is the Government’s relegation of responsibility for PD to providers..

p. 64:

The ACSF is widely regarded as the pre-eminent framework for describing core skills. Its careful and considered development and validation have propelled it into a dominant position in VET and have set the benchmark for any future review and revision. (p. 58)

Some ACSF Core Skills and isolated Indicators are named and used in various contexts for various purposes, for example, to determine eligibility for and placements in the AMEP and other VET programs, and – most problematically – to specify KPIs for student attainment. These naming practices follow from Government requirements. They are now accepted but were not chosen by practising teachers. ACTA agrees that the ACSF provides one way to determine learner eligibility for LLN tuition but we oppose its use in KPI specifications for the same reasons as documented in the ACER Review (see section 3 above).

The Review is useful in identifying some of the difficulties teachers have with the language of the ACSF. However, the biggest problem for teachers of EAL/D learners is that learning *literacy* is assumed to mean the same as *learning English*. This fundamental flaw has never been acknowledged by ACSF proponents and also characterises the Review.

For EAL/D learners, ACTA believes that any proposed refinements to the ACSF should be evaluated for their usefulness in identifying eligibility for the AMEP and other LLN programs, nothing more. A greater and more urgent priority is to improve:

1. **what** teachers are asked to teach in their classrooms (i.e. curriculum and supporting materials)
2. **how** teachers teach (i.e. professional development to extend their strategies in working with learners and different kinds of learners)
3. provision *specifically* directed to meeting **diverse learner needs** (for example, refugee youth, child care and aged care workers, access to health care).

ACTA believes that *what is taught* should be the focus for describing learner attainment in LLN programs, not the ACSF or any other generalised assessment. Moreover, description should be directed to gaining valid and reliable data on learner gains that is not corrupted or compromised by ties to KPIs that incentivise gaming and therefore require expensive and punitive auditing. As ACTA has repeatedly argued in other submissions, AMEP providers and the AMEP’s overall performance should be rigorously evaluated against a recognised and comprehensive set of Standards that include but are not narrowly focussed on student attainment.²⁸ We believe that similar Standards would benefit other LLN provision.²⁹

This crucial point takes us beyond the topic at hand and into the realm of how provider performance is evaluated, the place of KPIs and their relevance to Program and national goals, and the award and continuation of AMEP and other LLN contracts. The current environment espousing reform of public sector services, including Foundation Studies provision, cannot ignore these fundamentals, within which the ACSF has inappropriately been given a role.

How the ACSF was established as the common language for describing LLN in the Australian VET system is particular to Australian history and politics. The current position and use of the ACSF have little to do with its merits. Its predecessor, the NRS, was developed in the context of the Hawke-Keating “economic re-structuring” reforms and filled a gap. Those who developed the NRS and ACSF were strategically placed within existing structures and the specific bodies created to achieve these reforms at both the macro- and micro-levels. The NRS and the later ACSF embody their preferences and approaches, their choice to dismiss SLA research and the assessment literature, and

²⁸ See, for example, ACTA’s responses to the Department of Home Affairs consultation on reforms to the AMEP (June-July 2021): [Advocacy – Australian Council of TESOL Associations](#)

²⁹ This is a ke

their ambition to create an “overarching ... framework intended for multiple purposes” (Review, p. 11). ACSF proponents and the ACER Review have consistently failed to engage with substantive critique, including the need to restrict and refine claims for the ACSF. Consequently, the ACSF is unclear, unnecessarily complex and overly ambitious, at least in claiming application to EAL/D learners.

ACTA recognizes that the ACSF now has a role in the VET system. To the extent that provision for EAL/D learners is entailed any future development of the ACSF, we believe ACTA should have a place in representing teachers and EAL/D learners as these developments proceed. We hope that we would be welcomed in assisting resolution of the problems that we have outlined in this feedback, and would approach this task in good faith.

APPENDIX A: Factual Errors

Two factual errors occur in the Review that, albeit minor, are of concern to ACTA.

First, in regard to the AMEP it is stated that “the ACSF is used to measure client initial language proficiency and English language progression” (p. 17). Subsequently, it is reported that:

the Department of Home Affairs has revised the future AMEP business model (‘the revised business model’) and stated that the ACSF ‘ ... English language progression will be measured against the AMEP national curriculum, the EAL Framework. The Department will consider inclusion of ACSF alignment information where appropriate or useful.’ (p. 45)

The correct version is the latter.

Second, Appendix 1 lists the following as included in “Discovery Interviews”:

commonwealth and state-based policy and program managers of nationally-funded programs that use the frameworks (AMEP, FSfYF, SEE, VET Student Loans), including the President of ACTA and her admissions manager (p. 69)

The Australian Council of TESOL Associations (ACTA) is not a national funded program and does not have an “admissions manager”. The then-President of ACTA was interviewed in her capacity as both CEO of Carringbush Adult Education in Melbourne and ACTA President.

As is made clear in this submission, long-standing ACTA policy has not endorsed the ACSF.
