

*ACTA INTERIM STATEMENT*  
**PROPOSED AMEP FUNDING**  
BASED ON  
**STUDENT ACHIEVEMENTS**

*Draft 3 13/06/2021*

## **1 Background**

The Department of Home Affairs has released a Background Paper outlining proposals for further reforms to the Adult Migrant English Program: [AMEP Reform Discussion Paper 11 May \(homeaffairs.gov.au\)](#). The Department is seeking feedback on these proposals from stakeholders and all interested parties.

The central proposal is to make **67% of funding to AMEP providers contingent on students' achievement of competencies** (presumably as defined in the new common national curriculum, the *English as an Additional Language Framework*,<sup>1</sup> accredited through the Victorian Registration and Qualifications Authority).

### **1.1 On-line forums**

The Department is inviting key industry and community stakeholders to participate in web forums to discuss specific aspects of the reform. The forums will take place from **17 May – 9 July**. Invitations will be issued by email. If an organisation is interested in being represented at one of the web forums, the contact details should be submitted at: [Reform of the Adult Migrant English Program \(AMEP\) - Targeted forums \(homeaffairs.gov.au\)](#)

### **1.2 Written submissions**

Written submissions can be made on a form downloadable at [Reform of the Adult Migrant English Program \(AMEP\) – Submission form \(homeaffairs.gov.au\)](#). Submissions are due by **9 July**.

## **2. Response from the Australian Council of TESOL Associations (ACTA)**

ACTA is currently developing its response. This will be based on on-line forums conducted through State/Territory member associations and other input. We will make this response available on our website as soon as possible.

As an interim measure, we are circulating for information and feedback our position in regard to (1) what would constitute valid AMEP outcomes that could be reliably measured, and (2) the adverse impact of funding that was contingent on any such measures: see sections 3 and 4 below. Our outline of proposed AMEP outcomes has been warmly endorsed in the forums we have conducted and participants have requested a way to access this material.

## **3. AMEP Goals and AMEP Outcomes**

In determining clear and measurable outcomes for the Adult Migrant English Program, it is important to distinguish between the **national goals** which the AMEP serves and **program outcomes** that can be

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<sup>1</sup> Template for course documentation for accreditation (williamstown-spotswoodcc.org.au)

## Broad AMEP Goals

*The AMEP is instituted, designed & funded to promote national goals of:*

- migrant settlement
- migrant training & employment
- adult migrants' individual and group social & economic well-being
- Australia's social cohesion.

## Specific AMEP Outcomes

*The AMEP's performance can be validly and reliably measured in regard to:*

- levels of *participation* in the AMEP
- *English language gains* in the AMEP
- *students' satisfaction* with their experience in the AMEP
- AMEP providers's performance against *appropriate Program Standards*
- robustness of the *evidence* that supports & helps improve the Program.

validly and reliably measured in assessing the AMEP's performance.<sup>2</sup> This distinction is summarised in the following diagram.

### 3.1 AMEP goals

The AMEP is funded by the Commonwealth Government to support Australia as an immigration nation. Its broad social goals can be variously specified but can be roughly summed up as **promoting adult migrant English language learners' success in:**

- settling in Australia
- accessing pathways into training, education and employment
- achieving individual/personal and collective social and economic well-being
- contributing to overall social cohesion.<sup>3</sup>

The AMEP's *contribution* to these broad national goals can and should be researched and, as appropriate, measured, including over time.

However, attempting directly *to measure the AMEP's performance* in relation to these goals would be absurd, since the extent to these goals are achieved depends on multiple factors beyond the AMEP's

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<sup>2</sup> By *valid* is meant that the measures are appropriate to what is being measured. By *reliable* is meant that measures are consistent and independent of extraneous factors.

<sup>3</sup> The DHA Discussion Paper refers to "better educational and employment opportunities, engage[ment] in our democracy, and build[ing] lasting relationships with other members of the Australian community" (p. 3); "social participation, economic well-being, independence, and personal well-being; all contributing to enabling the full participation of migrants in Australian life" (p. 3).

control, for example the state of the labour market. Progress towards these goals depends largely on what happens to people *after* they exit the AMEP, for which the Program cannot be held responsible.

### **3.2 The AMEP's performance in relation to specific outcomes**

Valid and reliable measures of the AMEP's performance can and should be directed to **the matters under the control of those administering and delivering this Program**, that is governments (policy makers and Departmental officials) and providers (managers and teachers).

The outcomes listed in Table 1 below constitute criteria against which the AMEP's performance could be validly and reliably measured. The benchmarks underpinning these criteria will be valid and reliable *if and only if* they are supported by **a robust and consistent evidence base**.

*See next page.*

**Table 1: Measurable AMEP Outcomes**

<i>Outcomes</i>	<i>What should be measured?</i>	<i>What would count as success?</i>
<b>1. Participation.</b>	The number of adult migrant English language learners (i.e. those with less than “vocational English”) <b>who participate in the AMEP.</b>	Achieving or exceeding evidence-based benchmarks for <i>enrolments</i> in the AMEP relative to the total pool of eligible enrollees (see Outcome 5) and <i>retention rates</i> based on benchmarks established for Outcome 2. <sup>4</sup>
<b>2. English language gains.</b>	<b>English entry &amp; exit levels</b> of those who enrol and stay in the AMEP.  <b>Progress in reaching milestones.</b>	<b>Learner gains</b> in English in the AMEP according to valid and reliable English assessments and evidence-based norms for different learner cohorts in relation to their starting points and typical learning trajectories. (See Outcome 5.)
<b>3. Student satisfaction.</b>	<b>AMEP student responses</b> to validly and reliably designed and administered survey questions.	<b>High satisfaction levels</b> in relation to the AMEP’s ultimate goals.
<b>4. Program quality.</b>	<b>Ratings on an A – E scale</b> of individual provider performance against a comprehensive, relevant and agreed set of TESOL program standards, for example, the NEAS <i>AMEP Manual Standards and Criteria for AMEP Providers</i> (attached).	Providers performing at <b>A or B level according to independent assessments</b> by experts in program delivery, including teaching English to adult speakers of other languages.
<b>5. A robust and credible evidence base that supports the AMEP overall and Outcomes 1-4 in particular.</b>	The overall research base is not measurable in any meaningful way but specific research questions will include measurements that should be clearly valid and reliable.	The evidence base meets the following criteria: <ul style="list-style-type: none"> <li>• The <b>benchmarks</b> for Outcomes 1-4 against which individual provider and overall AMEP achievements are evaluated are soundly based, and consistently applied from one contract to the next.</li> <li>• Sound research shows how <b>agreed AMEP outcomes promote</b> the Program’s ultimate goals.</li> <li>• The research underpinning the AMEP’s evidence base is relevant to and pursues both <b>specific and more general questions</b> about the AMEP, its existing and potential students, and the Program’s ultimate goals.</li> <li>• the evidence base supporting the AMEP <b>is transparent and accessible</b> to examination in the public domain.</li> </ul>

<sup>4</sup> That 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.

Consistent measurements of the above outcomes would provide a clear picture of the AMEP's performance, including variations (and hopefully progress) over time.

In fact, *no* consistency is evident in any measure of AMEP outcomes since the Program began in the late 1940s or even from one contract or review of the AMEP to the next.

#### 4. Outcomes-based funding

Policy that seeks to *promote the achievement of desired outcomes* in the AMEP is totally different from *funding* AMEP providers contingent on their achievement of discrete outcomes, in this case students' achievement of competencies.

**In fact, the inherently perverse and unethical incentives in this funding model will destroy any possibility of achieving these outcomes or even knowing if and how they have been achieved.**

To achieve student learning outcomes, their teachers must first be employed, premises rented and the necessary infrastructure put in place. If the bulk of provider payments rests on subsequent student achievements, how are set up and tuition costs to be paid or underwritten? No prudent financial manager should be prepared to take the risk that their current expenditure and future income will be recouped by something as unpredictable as prospective students' subsequent behaviour, much less the vulnerable and transient English language learners for whom the AMEP caters.

Attempts by providers to survive this funding regime will create:

- testing of students as frequently as possible in order to maximise reporting on successful outcomes
- teaching exclusively directed to ensuring students pass these tests
- “tick and flick” credentialling that bears minimal relation to actual English language gains
- under-assessment of incoming students so as to maximise records of progress
- gaming and fabrication of assessments
- large classes to mitigate risk
- the exclusion of low-performing students (who are the largest proportion of the English language learners that the AMEP seeks to serve)
- the corruption, depersonalisation and objectification of student-teacher relationships (because teachers' livelihoods will be directly dependent on students' performance)
- expensive, intrusive and draconian auditing and compliance procedures
- provider and teacher resistance and antagonism to these procedures
- massively increased risks of program collapses, provider bankruptcies, teacher unemployment and disruptions to student enrolments and progress.

The effect of making providers' viability and teachers' livelihoods dependent on students passing tests will make the AMEP even more test-dominated than it was in the previous contract.

Funding that rests on the achievement of the competences specified in the *EAL Frameworks* will redirect the AMEP even further from its settlement goals than did the previous contract and assessments based on the Australian Core Skills Framework (ACSF).

Assessment-driven teaching will undermine participation and retention in the AMEP, and will exacerbate existing students' reasons for withdrawing because of the Program's excessive testing and narrow focus.

Funding dependent on student achievements will close the door to participation by students with life situations that impact on their attendance and performance, for example, family illness, caring for

children, spouses and elderly parents, moving house and the effects of torture and trauma on themselves and those for whom they are responsible. Placing these students in “the community-based learning stream” (p. 11) will not meet their needs and aspirations, as the failure of the previous “Social English stream” has clearly demonstrated.

Contrary to the claim in the DHA Discussion Paper (p. 7), *no* credible evidence supports outcomes-based funding. Likewise, the Paper leads the reader to thinking that outcomes-based funding was recommended by the 2017 Parliamentary Inquiry into Migrant Settlement Outcomes (p. 7). In fact, this Inquiry made no such recommendation. Together with the reports listed on pp. 3-4 and numerous others, the Inquiry recommended ending the 510-hour cap on tuition and restrictions on eligibility, as the Government has done.

Similarly, making providers’ financial viability and teachers’ livelihoods contingent on student outcomes will not incentivise students to achieve, as is implied in the DHA Discussion Paper (Q. 1, p. 9). Although this payment system will impact substantively on the quality of AMEP student experiences, students will not understand or be motivated by the Program funding model.

Moreover, as the Social Compass and many other reports have document, outcomes from the AMEP relate as much to building confidence and creating positive social relations as they do to test results.

In regard to students, funding contingent on their achievements will, in fact, fundamentally undermine the ethical basis of their relationship with their teachers. As in all educational contexts, this relationship rests on a teacher’s professionally grounded and guided responses to a student’s learning needs and aspirations, learning pathways and achievements. The integrity of the pedagogic relationship crucially depends on the teacher’s absence of *any* vested interest in what they teach, how they assess their students, how they communicate with their students, and how they report to others about these students. This relationship rests on truth, honesty, trust and respect for the other’s autonomy. Funding dependent on student outcomes places teachers’ professionalism and commitment to their students’ success in question, needing some form of external stick/carrot.

A likely effect is that it will bring about precisely this undesirable situation. Making teachers’ livelihoods dependent on the results of student assessments puts teachers’ legitimate self-interest in maintaining their livelihoods directly in conflict with their professionalism and personal honesty. Irrespective of the imperative to which individual teachers respond in actual practice, putting their livelihoods at stake will place their professional and personal integrity continually under suspicion. Correspondingly, the trust on which the teacher-student relationship rests will be destroyed if students learn that their test performance determines their teacher’s payments and employment.

Outcomes-based funding for the AMEP will damage the Program more fundamentally than did the disastrous 2017-2020 contract. It will completely negate the positive and long-overdue reforms instituted on 19 April 2021. It cannot “make English tuition more accessible, ensure better quality outcomes and encourage greater participation” (Discussion Paper, p. 6). Its inherently perverse and unethical incentives will directly and potently undermine the conditions necessary to achieve any such outcomes.

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