

English Australia submission

Registered nurse accreditation standards review
Consultation Stage 3



Sent to: Accreditation Standards

Submission via: accreditation@anmac.org.au

English Australia Comments

English Australia, formerly known as the ELICOS Association, is the national peak body and professional association for the **English Language Intensive Courses for Overseas Students (ELICOS)** sector of international education. English Australia represents over 125 member colleges across Australia and over 80% of all overseas students who study English in Australia do so with an English Australia member college.

This submission is being provided with support of the **University English Language Centres (UECA)**. University English Language Centres Australia (UECA) is a network of 30 Australian universities offering English Language Courses for Overseas Students (ELICOS) and IELTS test preparation of the highest international standard.

Considerations for the review

This submission is in regard to the proposed changes to the Registered Nurse Accreditation Standards (RNAS) published by the Australian Nursing and Midwifery Accreditation Council (ANMAC) as part of its consultation process.

Our concern relates to the amendments outlined in **Part B of Standard 1.6: Safety of the Public** on demonstrating English language proficiency. In particular, we are concerned that these changes may result in an unintended consequence that would lead international students to undertake a narrow set of external assessments in lieu of the common Direct Entry Programs (e.g. English for Academic Purpose (EAP) or Tertiary Preparation Programs (TPP)) that almost all Australian universities currently utilise.

The changes to **Standard 1.6 Part B** will require nursing and midwifery applicants to:

b) provide evidence of meeting the NMBA's English language skills registration standard

This proposed amendment appears to replace the previous ANMAC Enrolled Nurse Accreditation **Standards 2017 – Standard 6: Students**

The program provider demonstrates:

6.1 Applicants are informed of the following before accepting an offer of enrolment:

a. students that would be required by the Nursing and Midwifery Board of Australia (NMBA) to provide a formal English language skills test when applying for registration, must provide a formal English language test result demonstrating they have achieved the NMBA specified level of English language skills, prior to commencing the program.

The concern relates to the change from applicants being **informed** of NMBA requirements to **providing evidence of meeting** the NMBA requirements, as they relate to English Language Skills.

As Nursing and Midwifery Board of Australia (NMBA) registration standards related to English Language Skills exclude demonstration of English language proficiency via a Direct Entry Program, it would appear that a student could not enter a Nursing course without completing an external English Language test.

English Australia acknowledges the importance of English language proficiency in the nursing profession and recognises this requirement for admission to academic study. We also respect the NMBA's requirements for registration and the value in ANMAC aligning proficiency levels.

We are advocating that it is feasible that appropriate English language proficiency for enrolment into study can be reached through Direct Entry programs without requiring an external test.

Direct Entry Programs are an effective alternative to external English language testing

Direct Entry Programs involve international students learning English within an academic framework that includes attending lectures, participating in class tutorials and completing essays to prepare them for their studies. During this study, students are tested and assessed using a range of tools that validate assessment outcomes. Direct Entry Programs enable students to meet university English language proficiency prerequisites whilst also developing essential academic skills to facilitate successful degree studies.

Direct Entry Programs must meet TEQSA's stringent assessment and evaluation requirements

Critically, the methods of assessment and evaluation that English language schools use are regulated by the Tertiary Education Quality and Standards Agency (TEQSA) to ensure the highest standards are upheld by all providers of Direct Entry Programs.

Further safeguarding the integrity of these courses are the *National ELICOS Standards 2018* which includes specific mechanisms for assessing Direct Entry Programs in line with an external assessment like TOEFL and IELTS. These Standards were further clarified at the beginning of this year when TEQSA issued *Guidance Note: Direct Entry ELICOS* specifically to ensure that education providers follow best practice in assessing and evaluating their Direct Entry Programs.

As self-accrediting institutions, Australian Universities currently accept students that have completed Direct Entry Programs for admission into academic study **without** requiring the student to undertake a further external assessment such as IELTS, on the proviso that the student has been internally assessed as having reached the equivalent of the published university entry requirements.

Direct Entry Programs continually assess students rather than assessing just at a point in time

It is also worth noting that a such as IELTS test measures English proficiency at a particular point in time; a course employs assessment tasks and tools to measure English language proficiency and the ability to

successfully complete academic tasks including research and referencing skills over a period of time (usually between 3 or longer)

Direct Entry Program students' performance is equivalent to their domestic counterparts

Once a student completes their Direct Entry Program, they move onto their higher education study with both the needed English language proficiency and academic skills to succeed. This success is strongly evidenced by a study from the Australian Catholic University (ACU) that investigated the performance of students who completed a Direct Entry Program prior to commencing an undergraduate degree, with the majority of these students progressing into the Bachelor of Nursing. Students who completed the Tertiary Preparation Program (TPP) or English for Academic Purposes Direct Entry performed at an equivalent level to their domestic counterparts studying in the Bachelor of Nursing in 2013 and 2014 (see Appendix A).

The success of these students demonstrates that Direct Entry Programs are a viable alternative to standardised testing in assessing English language proficiency, and have the advantage of including preparation for successful study in an Australian tertiary environment. The quality of these courses is reinforced by the comprehensive regulatory framework that ensures their integrity. Direct Entry Programs should continue as an alternative pathway to demonstrating English language proficiency.

The ACU case study is just one sample of the effectiveness of Direct Entry Programs and an indication of the scale (volume) of prospective students that could be affected by a change if this pathway was excluded under changes to accreditations requirements.

Next steps

English Australia acknowledges that ANMAC has undertaken a thorough process of consultation on the proposed amendments to accreditation standards. We hope this submission provides insight into a potential unintended consequence. However, we recognise that there may be alternative mechanisms which ANMAC may have considered to address this issue.

We would welcome any opportunity for further discussion.

Appendix A

Australian Catholic University B Nursing students (2013-2014)						
	Australian Domestic Students			English for Academic Purposes- Tertiary Preparation Program Students		
Study Location	Mean GPA	Std. Deviation	N	Mean GPA	Std. Deviation	N
Ballarat	4.23	1.361	981	4.50	.707	2
Brisbane	3.68	1.691	2590	3.62	1.648	68
Canberra	3.93	1.454	835	n/a	n/a	Na/
Melbourne	4.31	1.490	4615	3.98	1.503	283
North Sydney	3.90	1.500	5146	4.46	.981	276
<i>Total</i>	<i>4.02</i>	<i>1.540</i>	<i>14167</i>	<i>4.15</i>	<i>1.346</i>	<i>629</i>

For further information, please contact the undersigned.

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