

Defining Assessment Standards for a New National Tertiary-level Qualification

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In this era of public accountability, defining levels of performance for assessment purposes has become a major consideration for educational institutions. It was certainly true of the development by the national qualifications authority of the New Zealand Certificates of English Language (NZCEL), a five-level sequence of awards for learners of English as an additional language at the post-secondary level implemented in 2014. The process of defining the five levels involved benchmarking of standards both nationally and internationally, particularly in relation to the Common European Framework of Reference (CEFR). This paper presents an outsider's view of the definition of standards for the NZCEL, based on information provided by key participants at the national and local levels. The process has involved taking account of not only the CEFR but also the New Zealand Qualifications Framework (NZQF) and the band score levels of the International English Language Testing System (IELTS). The paper focuses in particular on the issue of establishing the equivalence of NZCEL 4 (Academic) to other recognised measures of English language proficiency as an admission requirement to undergraduate study for international students. The benchmarking process was both multi-faceted and open-ended, in that several issues remain unresolved as implementation of programmes leading to the NZCEL 4 (Academic) has proceeded. At the time of writing, the NZCEL qualifications are scheduled for a formal review and the paper concludes with a discussion of the issues that ideally should be addressed in evaluating the qualification to date.

Key words: language standards, English language qualifications, CEFR, university admission, benchmarking

Introduction

Since the 1980s politicians and government bureaucrats have sought to achieve greater accountability in education with a focus on learning outcomes in language teaching, as in other areas of education, and a number of frameworks have been developed to describe and assess levels of proficiency for this purpose (Brindley 1998, 2001). The particular context for this article is the provision of English language teaching programmes at the senior secondary and tertiary levels for both adult migrants and refugees and for international students in New Zealand (as in Australia). Although some of these learners need English primarily for social purposes, the majority are preparing for further study or employment in the host country. The delivery of appropriate courses generates a variety of internal assessment needs for providers, including initial placement of students and diagnosis of their learning needs; recognition of their achievement in a particular class; and advancement from one class to a higher-level one. However, it is necessary to report learners' proficiency externally when they move from one provider to another, or when they are considered to be ready for academic study or employment. The issue to be considered here is what frame of reference to use in establishing assessment standards¹ for a national qualification in English language.

In terms of the theme of this special issue of the journal, the present paper is not a report on the evaluation of a particular assessment scheme. For one thing, the qualifications involved have just completed their second year of operation. In addition, the providers of the qualifications have considerable flexibility overall in how they assess their students in relation to nationally defined outcomes in the form of a graduate profile. On the other hand, at the time of writing an institutional review of the qualifications is due to be conducted, once decisions have been made about timing, procedures and review criteria, and so the present paper raises a number of questions about the definition of the standards for these qualifications which should be addressed in the qualification review.

National proficiency frameworks

About a decade ago, decision-makers in both New Zealand and Australia were attracted to the idea of developing national frameworks for English language proficiency levels that could serve external reporting purposes, particularly for international students, and they funded projects in each country to explore the

¹ It should be noted that "standards" is a term with multiple meanings in the assessment literature, as I have discussed elsewhere (Read, 2014). Here I am using it in a generic sense, as distinct from the particular usages of the New Zealand Qualifications Authority, as explained below.

possibility. In New Zealand the project was initiated by Education New Zealand, the organization which promotes education opportunities internationally on behalf of both public and private providers (Read & Hirsh, 2005), whereas the Australian project was undertaken with funding from the federal Department of Education, Science and Training (Elder & O'Loughlin, 2007). The focus of the Australian project was on ELICOS Centres, which offer English Language Intensive Courses for Overseas Students, and which must meet high quality standards regulated by the government.

Both projects involved first a review of the literature on English proficiency frameworks and then a survey of academic managers and teachers in language schools across the country to obtain their views on the proposed framework. The results were quite similar in the two cases. Among the arguments in favour of a national framework were: the perceived need for more consistency in reporting students' proficiency levels; the desirability of making assessments and certificates more portable when students transferred from one education provider to another; the potential to improve the assessment skills of teachers; and the value of the framework as a marketing tool for recruiting students from abroad. Most of the survey respondents accepted these points.

Nevertheless, the arguments against a national framework were stronger. First, a number of language schools had already invested a lot of resources in developing their own assessment procedures and they were reluctant either to share them with other providers or to replace them with a new national proficiency framework. Partly for this reason, there was really no powerful motivation for introducing such a framework, and no indication from either of the organizations which set up the two research projects that they would be willing or able to deliver the substantial amount of funding required to develop a proficiency framework in a professional manner. Perhaps the most telling argument was that the levels defined by a national framework would not be understood or accepted internationally, so they would need to be benchmarked against an external framework to achieve wider currency.

In practice, the International English Language Testing System (IELTS) is well established in both of these countries as the preferred international test for assessing the proficiency of international students. The meaning of IELTS band scores is widely understood and they act as a means for English teaching professionals to identify students' English levels and to specify the minimum entry requirement for a particular language course. However, Elder and O'Loughlin (2007) found that, among the frameworks their Australian survey participants were familiar with, there was a preference for the Common European Framework of Reference (CEFR) as the most suitable one for their purposes.

The Common European Framework of Reference (CEFR)

The CEFR (Council of Europe, 2001) has come to be seen as applicable not just in its original context of adult language learning in Europe but as almost a universal system for defining and assessing levels of language proficiency. A recent collection of papers (Byram & Parmenter, 2012) discusses the influence of the CEFR in many different countries around the world.

It is important to make the point that the CEFR is about a lot more than just assessment. The sub-title of the 2001 volume is “Learning, teaching, assessment”, and the document is concerned with the processes and goals of language learning and teaching as much as with the assessment of learning outcomes. As stated on the website, the CEFR “was designed to provide a transparent, coherent and comprehensive basis for the elaboration of language syllabuses and curriculum guidelines, the design of teaching and learning materials, and the assessment of foreign language proficiency” (Council of Europe, 2014). Thus, for example, it has become a routine practice to label English teaching materials as targeting a particular CEFR level.

Nevertheless, it is as a proficiency assessment framework that the CEFR has had its greatest impact internationally. Interest in the framework has spread well beyond those who are directly involved in language education. As McNamara (2014) has pointed out, the CEFR appeals to policymakers who need to respond to calls for accountability in education. Thus, the framework has come to function as a management tool for government officials to exercise control over language education by specifying learning outcomes in general terms, without reference to a particular test. It is also attractive as a means of defining minimum levels of language proficiency in contexts such as higher education, employment and immigration. “The functionality of a universal letter/number system to code the six levels is a key feature of the CEFR, which makes it attractive to administrators and policymakers” (McNamara, 2014, p. 227). For example, UK Visas and Immigration (formerly the United Kingdom Border Agency) specifies the minimum language requirements for the issue of various types of visa for entry to Britain in terms of levels on the CEFR, which can be assessed through various approved English tests.

In New Zealand the CEFR has had a low profile until recently, with two exceptions. One, as reported by Koefoed (2012) and Scott & East (2012), was on the thinking behind the development of the Learning Languages component of the New Zealand Curriculum for primary and secondary schools. An influential adviser in the Ministry of Education, Gail Spence, was inspired by the communicative approach to language teaching and learning embodied in the CEFR volume to push the

curriculum decisively away from its traditional focus on language knowledge towards more functional uses of the target language for communicative purposes.

Secondly, the CEFR has had a growing influence on private language schools in recent years. Languages International in Auckland was an early adopter of the framework as the basis for its whole teaching syllabus and, since 2002, has included CEFR self-assessment scales as part of its online pre-entry test for prospective students (Darren Conway, personal communication, 25 January 2016). Like Languages International, numerous schools now offer preparation courses for the Cambridge main suite exams – such as Cambridge English: First (FCE) and Cambridge English: Advanced (CAE) – which are claimed to be aligned to CEFR levels. And increasingly, internationally published textbooks, graded readers, placement tests and other resources used by language schools and their teachers are labelled by reference to target levels on the framework.

The New Zealand Certificates of English Language (NZCEL)

In the last few years, though, the CEFR has played a significant part in the development of a new qualification for non-university providers of English language courses at the tertiary level. Before 2014, institutes of technology, polytechnics and private training establishments (PTEs) were required to submit their individual certificate programmes for approval by the New Zealand Qualifications Authority (NZQA). International students were issued with a visa only if they presented evidence that they had been accepted for a named certificate course at a particular institution. This resulted in 79 providers offering a total of 274 English language qualifications at different proficiency levels, for both international students and adult migrants and refugees needing English for everyday social communication, employment and further education. The titles of the qualifications included Certificate in Beginner English; Certificate in Business English; Certificate in English (Specific Purposes); Certificate in English for Nursing; Certificate in English (Advanced); Certificate in Academic English (IELTS); and Certificate in English for Academic Study.

In order to rationalise this welter of institution-specific certificates, NZQA spent several years conceptualising and consulting on a standard suite of qualifications, called the New Zealand Certificates in English Language (NZCEL), to be offered by all recognised providers on a national basis. The basic structure of the certificates is presented in Table 1. At Levels 1, 2 and 3 the certificates focus on General English, whereas at the higher levels they may be awarded with a Workplace, Academic or Professional endorsement if the courses the learners have taken have been designed for these more specific language needs. Table 1 also shows that the NZCEL

programme is referenced to two systems of levels, which will now be considered in turn.

Table 1. The levels of the New Zealand Certificates in English Language (NZCEL)

NZQF Level	Qualification	CEFR Level
1	NZCEL (Foundation)	Low A1
1	NZCEL (Level 1)	High A1-low A2
2	NZCEL (Level 2)	High A2-low B1
3	NZCEL (General/Workplace/Academic)	B1
4	NZCEL (General/Workplace/Academic)	B2
5	NZCEL (Professional/Academic)	C1

Like all qualifications at senior secondary school level and above, the NZCEL certificates are positioned on the New Zealand Qualifications Framework (NZQF), which had its origins in 1992 (and then called the National Qualifications Framework – NQF) as a common frame of reference for all public and private providers of post-secondary education. Originally it was designed to be a fully standards-based system, with qualifications being composed of credits gained from achieving “unit standards” which specify common learning outcomes, irrespective of how, when or where the learning was achieved. One aspiration of the developers of the framework was to break down the traditional division between academic and vocational education, with the goal of giving equal status to both. However, although in principle the NZQF includes university degrees up to the doctoral level, in practice the universities have maintained the autonomy of their qualifications through their peak body, Universities New Zealand, including the retention of their own quality assurance mechanisms and examining procedures. To accommodate university degrees and other non-standards-based qualifications, the New Zealand Register of Quality Assured Qualifications was developed in 2001. The current NZQF, dating from 2010, integrated the NQF and the Register into the single structure shown in Table 2. (For further details, see www.nzqa.govt.nz/studying-in-new-zealand/understand-nz-quals/nzqf/.)

Table 2. The levels of the New Zealand Qualifications Framework

Level	Qualification Types
10	Doctoral degree
9	Master’s degree
8	Postgraduate diplomas and certificates; Bachelor’s degree with Honours
7	Bachelor’s degree
6	Diplomas
5	
4	Certificates
3)
2) National Certificate of Educational Achievement (NCEA)
1) (the senior secondary school qualification)

As seen in Table 1, the NZCEL covers Levels 1 to 5 of the New Zealand Qualifications Framework. At the first three levels, it overlaps with the National Certificate of Educational Achievement (NCEA), which is the mainstream qualification for the last three years of secondary education (Years 11 to 13) in New Zealand, with the assumption that this is the transition period from compulsory schooling to higher education, vocational training and/or employment. However, there is a conceptual challenge here in reconciling learning achievements in school for the NCEA, which for most students build on ten years of English-medium education, with the foundation learning undertaken for the lower levels of the NZCEL by adult migrants and refugees who are acquiring basic language and literacy skills in another language. One way in which this issue has been accommodated is that the first two NZCEL certificates are both located at Level 1 of the framework.

At the top end of the scale, NZCEL Level 5 is the equivalent of the first year of an undergraduate degree, whereas Level 4 Academic is intended to represent a learner's readiness to tackle degree-level study. I will pick up this point below.

NZCEL and CEFR

As a New Zealand qualification, the NZCEL needed to be referenced to the NZQF, but it may not be so clear why the certificate levels are linked to the CEFR as well. According to the Manager Qualifications Services at NZQA (Linda Glogau, personal communication, 11 March 2014), there were several considerations involved. First, there was a request from stakeholders for some form of international benchmarking of the qualifications, and it seemed there was no realistic alternative to using the CEFR for this purpose. As Read and Hirsh (2004) noted, overall band scores on IELTS have developed during the last 20 years as a kind of common currency among English language teachers in New Zealand (as in Australia and elsewhere) in signalling learners' proficiency levels. However, practical difficulties would have arisen for NZQA in relating NZCEL levels to IELTS band scores. There was a perceived mismatch between the credit values to be assigned to each NZCEL level and the typically rather longer time taken by learners to advance from one IELTS level to another. Besides, the IELTS test was seen as a proprietary product which a government agency like NZQA could not appropriately endorse.

Two additional considerations worked in favour of the CEFR. As noted above, published course books which are claimed to be written to specific CEFR levels are readily available and thus could be valuable resources for teachers delivering courses at the corresponding NZCEL level. Course providers who are familiar with the original CEFR volume (Council of Europe, 2001) can also draw on this document as "a rich source of descriptors of language performance that can be utilised in

course and assessment design” (Steve Varley, personal communication, 29 January 2016). Secondly, there is a certain congruity between the underlying principles of the CEFR and the NZQF in their focus on specific learning outcomes and the fact that neither is linked to particular curricula or assessments.

I was not involved in the benchmarking of the NZCEL levels, but my informants told me that it required quite a complex process of matching, and trying to reconcile, information from a variety of level specifications -- or, as one of the key participants described it, “triangulating multiple data sources” (Mark Hornby, personal communication, 20 May 2014). Initially descriptors from the NZQF, the CEFR and IELTS were laid out side by side in an effort to identify common descriptors at particular levels. Table 3 sets out the range of sources which were consulted during the process.

The Council of Europe has published a manual (Council of Europe, 2009) on procedures to follow in aligning assessments to the CEFR. However, this publication assumes that the assessment is a particular test or exam, whereas in the case of the NZCEL the goal was to define the levels on a broader scale for a whole set of qualifications. Thus, the manual would have had limited value in guiding the benchmarking process.

Table 3. Resources for benchmarking the NZCEL levels

International	National
CEFR documents	NZQF levels, plus English language unit standards
IELTS band descriptors	
British Council/EAQUALS	Tertiary Education Commission (TEC) Learning Progressions
Core Inventory for General English	
ELT coursebooks and materials explicitly linked to the CEFR	Ministry of Education (MOE) English Language Learning Progressions

The CEFR was the primary source but, given that the Framework was not widely known in New Zealand, IELTS descriptors were helpful in providing a more familiar basis for the NZCEL stakeholders to understand the proficiency levels. In order to provide more pedagogical guidance for teachers working at the various levels, two other resources were consulted: the British Council/EAQUALS Core Inventory for General English, and ELT coursebooks which (according to the publishers) were linked to CEFR levels. These sources covered the curriculum content for English language teaching in more depth than can be found in the CEFR volume. As my informant put it, “As writers of the qualifications, we needed to be able to describe content in a consistent way, relative to teaching practice. These sources enabled us to do that” (Mark Hornby, personal communication, 16 March 2016).

Looking at the resources at the national level, the New Zealand Qualifications Framework has already been discussed above. Within the NZQA Directory of Assessment Standards, there is a subject domain for English Language (formerly known as English for Speakers of Other Languages – ESOL), which contains numerous unit standards covering a wide array of English skills from Levels 1 to 4 of the NZQF. These have been available for some time to be credited to various qualifications on the framework in order to recognise English learning achievement by senior secondary students and adults from non-English speaking backgrounds. During the period in which the NZCEL qualification was developed, the former ESOL standards were systematically reviewed and revised to produce English Language unit standards that were closely aligned to the new qualifications. A separate domain was created for five unit standards in English for Academic Purposes, which will be discussed further below.

In addition, there were two sets of learning progressions. The first, published by the Tertiary Education Commission (2008), was designed to guide the teaching of literacy skills to adult second chance learners, whether from English-speaking backgrounds or not. These progressions were considered when defining the first two or three levels of the NZCEL. On the other hand, the English Language Learning Progressions developed under the auspices of the Ministry of Education (2008) were to guide ESOL specialists and mainstream teachers in schools in their work with English language learners who have English as an additional language. The rationale here was that schools might offer the NZCEL to students at the senior secondary level as an alternative or complementary qualification to the National Certificate of Educational Achievement. Thus, developing the full set of descriptors for the five NZCEL levels was obviously a complicated task.

NZCEL 4 (Academic) for university admission

Of the five levels, NZCEL 4 emerged as a particularly important one because it was seen as certifying that the student could meet the academic English requirements for admission to a degree programme. This was reflected in the Graduate Profile for NZCEL 4, which states that those awarded the certificate at this level “will have the English language skills to:

- understand main ideas and key supporting details of complex oral texts on familiar and sometimes unfamiliar topics;
- read and understand complex texts with a large degree of independence on familiar and sometimes unfamiliar topics;
- locate, organise and summarise important information in texts;

- speak with fluency and spontaneity to communicate with some degree of elaboration in a range of familiar and unfamiliar contexts;
- write coherent texts appropriate to audience and purpose, with few linguistic errors in a range of text types, synthesising and evaluating information and arguments from a number of sources.”

(Source:

www.nzqa.govt.nz/nzqf/search/viewQualification.do?selectedItemKey=1883)

The accompanying notes on the education pathways for students with NZCEL 4 state that completing the certificate “facilitates meeting the language requirements for ... most vocational and undergraduate programmes/courses and specialised fields of study”.

Thus, it was the aspiration of the sector representatives involved in developing the NZCEL qualification that NZCEL 4 (Academic) should be accepted as meeting the English language requirement for international students to be admitted to degree-level study, not only in the polytechnics and institutes of technology which offer the NZCEL through their own language schools but also at New Zealand’s eight universities. Until recently, all the indications have been that the universities would not accept the NZCEL as satisfying their requirements, perhaps because the NZCEL had only just been implemented and NZQA was still in the process of introducing an approach that would give some assurance of national consistency of graduate outcomes for New Zealand qualifications across providers throughout the country. (See www.nzqa.govt.nz/providers-partners/consistency-grad-outcomes/.)

Nevertheless, as part of the process of reviewing their institution’s requirements in mid-2014, the Admissions Office at the largest university, Auckland, recommended that NZCEL (Academic) be accepted for 2016, among its extensive list of recognised tests and other English language qualifications (https://cdn.auckland.ac.nz/assets/central/for/international-students/entry-requirements/2016%20English%20language%20requirements_2%20Jun.pdf) (see p. 9 of the document). One complication, though, is that the University of Auckland document specifies NZCEL Level 5, rather than Level 4. According to the Assessment Manager in the Applications and Admissions Office (Maree Shaw, personal communication, 16 November 2015), in mid-2014 the NZQA had on its website an equivalency table showing that NZCEL Level 5 was the equivalent of IELTS Band 6.0, which is the benchmark standard that all the New Zealand universities set for their undergraduate admissions of international students. The table has now been replaced by a revised version, which equates IELTS 6.0 with NZCEL 4: <http://www.nzqa.govt.nz/about-us/our-role/legislation/nzqa-rules/nzqf->

[related-rules/the-table/](#). However, the earlier table was the basis on which the University of Auckland requirement was set.

Equivalence to IELTS

This raises again the problematic issue of benchmarking different qualifications. As just noted, IELTS scores are the most common evidence of their English proficiency presented by international students applying for admission for study in New Zealand, and an overall Band 6.0 is the reference point for undergraduates. In Figure 1 we can see an equivalency graph from the IELTS website which shows that Band 6.0 (and even Band 6.5) falls within the range of Level B2 on the CEFR, although admittedly so does an IELTS score of 5.5². Thus, if NZCEL 4 is indeed benchmarked to CEFR Level B2, the evidence of this figure is that NZCEL Level 4 rather than Level 5 should be considered to be the equivalent of IELTS Band 6.0.

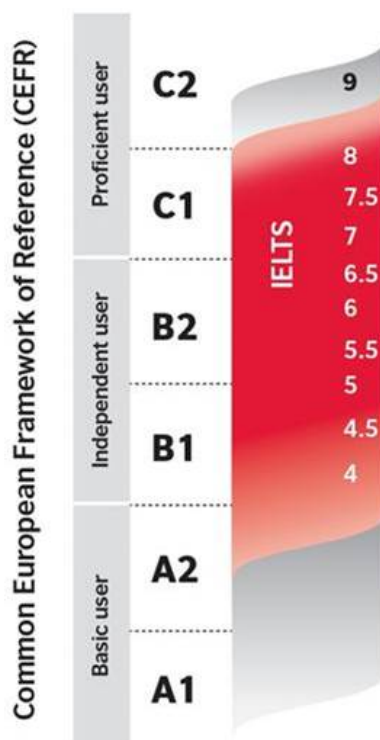


Figure 1. A CEFR-IELTS equivalence chart

(Source: www.ielts.org/researchers/common_european_framework.aspx)

To complicate the picture, most of the universities already accept the Cambridge examination which is said to be aligned to Level C1 of the CEFR, Cambridge

² One reviewer pointed out that the upward flow effect in the IELTS section of the figure might suggest that the B2 level actually corresponds to IELTS scores of 6.0, 6.5 and 7.0.

English: Advanced (CAE), as one of their recognised English language tests. One factor here is that Cambridge English has not maintained a consistent stance on this issue. McNamara (2011, p. 505) quotes from a document which was then available on the IELTS website summarising the results of three internal studies which variously suggested that the CAE could be equated to scores of either 6.0/6.5 or 6.5/7.0 on IELTS. In addition, as one of the reviewers of this paper pointed out, there have been external challenges from other test publishers to the equivalences claimed by Cambridge for their exams (de Jong, 2009; ETS, 2010).

Figure 1 can be interpreted to mean that (if we accept the Cambridge alignments with the CEFR) a good pass in the B2 level exam, Cambridge English: First (FCE), would be a closer equivalent to IELTS band 6.0 than the CAE. Thus, to the extent that they have made fully informed decisions on the matter, it appears that the universities are setting a higher benchmark in terms of the Cambridge exams than what they require of IELTS candidates. Perhaps, given the limited evidence to date of the reliability of the assessment procedures for the NZCEL qualification, it might be argued that it would be prudent for the universities to take a conservative approach and set Level 5 (CEFR C1) as their benchmark.

The EAP unit standards

Yet there is one further factor which needs to be taken into account. As a general principle, approved providers of courses leading to the NZCEL have a great deal of flexibility both in the design of courses and the selection of assessment procedures that reflect the needs of their learners. They may choose to draw from the inventory of English Language unit standards registered on the Directory of Assessment Standards as the basis for assessing their students, or develop their own tests and assessments independently. However, the one exception is NZCEL 4 (Academic), where the core of the assessment must be composed of the five unit standards in the domain of English for Academic Purposes (EAP)³. These standards are:

22749 Write texts under test conditions in English for academic purposes

22750 Write a crafted text using researched material in English for an academic purpose

22751 Read and process information in English for academic purposes

22891 Deliver an oral presentation in English for an academic purpose

22892 Demonstrate understanding of spoken texts and process information in English for academic purposes

³ Unlike the English Language unit standards, those in the EAP domain are available to all students, not just those who have English as an additional language.

(For details, see:

www.nzqa.govt.nz/framework/explore/domain.do?frameworkId=2011717366)

The first three standards had their origins about ten years ago in an NZQA working party, with representation from Universities New Zealand (including the present author). The intention was always that these standards would allow students to demonstrate that they had acquired in senior secondary school the academic language skills needed for university study. Two of the standards (22750 and 22751) have been accepted for some time as meeting the universities' academic literacy requirement for students matriculating through the pathway of the National Certificate of Educational Achievement (NCEA). Now all five standards have found a home in the NZCEL programme at Level 4. The issue, though, is whether the standards are really set at Level 4 of the framework (and thus B2 on the CEFR).

At the secondary school level, there has been very little uptake of the EAP standards, particularly since they were moved from ESOL/English Language to their own domain and thus are no longer exclusively for English language learners (ELLs). Simon Crosby, one of the Ministry of Education-funded facilitators for ELL support in Years 9-13, reports that teachers have found the levels of achievement required for the Level 4 EAP unit standards to be unrealistically high for most students in Years 12 and 13, and it is easier for the students to meet the academic literacy requirements for University Entrance through the range of approved NCEA achievement standards at Level 2 instead (personal communication, 20 January 2016).

Teachers in tertiary institutions have made similar observations about the level of the EAP unit standards. According to Steve Varley, the NZCEL Academic Leader at Unitec Institute of Technology, although the tasks are very appropriate as preparation for academic study, the evidence requirements for achieving the standards are set too high, and certainly beyond NZQF Level 4 or CEFR B2 (personal communication, 30 January 2016). Of particular concern in the case of English language learners is the high level of linguistic accuracy expected in student responses to the tasks.

NZQA consistency reviews

Apart from these issues relating the level of the qualification, the reliability of an assessment is always a matter of fundamental concern to language testers. Given that students are being assessed on the basis of the five unit standards using locally designed tasks at numerous institutions throughout the country, there is an obvious question of how consistently the standards are being applied. At this point, it should be noted that in NZQA usage consistency is a broader term than just a synonym for reliability. The Authority has recently adopted a policy of "Assuring national consistency of graduate outcomes of New Zealand qualifications"

(www.nzqa.govt.nz/providers-partners/consistency-grad-outcomes/). The policy certainly incorporates a consideration of whether effective moderation procedures are in place to compare the assessed work produced by students at different institutions, but it also gives priority to evidence that students who have completed the qualification have subsequently achieved positive outcomes. In the case of NZCEL 4 (Academic), this means primarily that graduates have been able to undertake study successfully at NZQF Level 5 or equivalent. From a language testing perspective, such evidence seems to relate more to predictive validity than to reliability.

In implementing the policy of assuring consistency, NZQA is conducting an ongoing series of consistency reviews for each of the qualifications on the NZQF. A review of NZCEL 4 was carried out early in 2015, just one year after the qualification was introduced, and the report can be found on the NZQA website: www.nzqa.govt.nz/assets/Providers-and-partners/Registration-and-accreditation/Consistency-of-graduate-outcomes/Consistency-review-reports/FINAL-1883-NZCEL-consistency-report.pdf. The report shows that the review is an auditing process in which an external reviewer evaluates the quality of the relevant evidence presented by the participating institutions, as well as the adequacy of the procedures used to obtain the evidence. Although the overall decision was “National consistency is confirmed”, the report includes comments on a number of areas of concern. After one year, most of the 21 Tertiary Education Organisations (TEOs) represented at the review sessions had few if any NZCEL 4 graduates to date. Only one TEO had collected and presented systematic evidence of graduate outcomes and “Evidence of robust external moderation ... was lacking in some areas.” Three of the TEOs which submitted external moderation of the EAP unit standards did not meet the requirements for the relevant standard. These can be seen as teething problems, given the scheduling of the consistency review at such an early stage in the implementation of the qualification.

In fact, there is some evidence for this conclusion in the more recent (November 2015) consistency review report for NZCEL 3: www.nzqa.govt.nz/assets/Providers-and-partners/Registration-and-accreditation/Consistency-of-graduate-outcomes/Consistency-review-reports/FINAL-1882-NZCEL-L3-Consistency-report.pdf. The reviewer found that most of the TEOs were obtaining more systematic data on graduate outcomes and they were all reported to be participating in “external moderation with multiple providers”, with a conscious focus on linking their assessments to the CEFR B1 level.

However, other issues in the NZCEL 4 report bring us back to the question of the level required for NZCEL 4 (Academic). Both students and teaching staff had found the workload involved in assessing the five EAP unit standards within a single

semester was very heavy. In addition, there was a “gap between the NZCEL Level 3 graduate and their ability to cope in the NZCEL Level 4”. The same point emerges as the key concern in the NZCEL 3 report. This questions one of the assumptions on which the whole NZCEL qualification was designed: that learners would be able to progress from one certificate level to the next after one semester of full-time study. This is the basis on which financial aid is provided to students. Even at the planning stage for NZCEL, members of the providers’ forum (of leading polytechnics and institutes of technology) had concluded from their previous teaching experience that students would require more time to complete NZCEL 3 (i.e. to make the transition from A2 to B1 on the CEFR), and they argued unsuccessfully that NZCEL 3 should be assigned 120 credits (equivalent to two semesters of study) rather than the standard 60 credits (Steve Varley, personal communication, 14 March 2014). This concern is echoed by the Tertiary Special Interest Group (SIG) of the national teachers’ organization, TESOLANZ. Their number-one issue with respect to the NZCEL qualifications is “The limited time funded for student completion of each level, which does not acknowledge the amount of learning required to pass from one level to the next” (Skyrme, 2015, p. 20).

Thus, it is clear that there are multiple issues to be addressed in the scheduled review by NZQA of the NZCEL qualification, and it appears at present that the universities need to be cautious about recognising NZCEL 4 (Academic) as meeting their English language requirement for international students undertaking undergraduate study.

Conclusion

The New Zealand Certificates in English Language (NZCEL) represent an innovative suite of qualifications to replace the previous array of certificates offered by non-university providers to recognise the achievements of migrants and others with English as an additional language in acquiring proficiency in English for use in social interaction, further study and employment. In keeping with the principles of the New Zealand Qualifications Framework, the design and delivery of the certificate courses need to be flexible enough to meet the widely varied needs of the NZCEL candidates. At the same time, it is necessary to take steps to ensure that consistent standards are being maintained across providers. The first stage towards achieving consistency is the main focus of this article: the benchmarking of the NZCEL levels by reference to national and international frameworks.

The benchmarking process has proved to be quite complex. The levels of the NZQF constitute a baseline for the NZCEL, but there was also an ambition to link the certificates with appropriate international standards. A pragmatic choice for this

purpose would have been the band scores of IELTS, which have broad currency among English language teachers in New Zealand, especially those engaged in preparing international students for university study. However, IELTS scores are not very meaningful at the beginning levels of English acquisition (corresponding to NZCEL 1 and 2) and, for other reasons as well, the Common European Framework was the preferred basis for international benchmarking. The level of familiarity with the CEFR has been relatively low until now among English language teaching professionals in New Zealand and thus, even for those leading the development of the NZCEL, a rapid learning process has been required.

In its intended role as a qualification to meet the English language requirement for university admission, NZCEL 4 (Academic) has thrown up multiple issues of equivalence with existing tests. Such issues are very familiar to language testers, who are justifiably sceptical of the validity of the equivalence tables so beloved by test users, which purport to show how scores on one test can be interpreted as being at the same level as scores on other, somewhat different kinds of tests. In the present case, what are being compared are bands and levels (as illustrated by Figure 1 above), rather than specific scores. On the one hand, this helps to communicate the idea that exact equivalence between different measures of English proficiency is an unrealistic goal. On the other hand, it leaves scope for genuine confusion about what the appropriate level of the NZCEL should be for specific purposes, such as the admission of students to undergraduate study, which has been the focus of this paper. It is to be hoped that these issues can be reduced over time as the programmes leading to the NZCEL qualifications are more fully implemented, and as a result of the scheduled review by NZQA.

Acknowledgements

I gratefully acknowledge the assistance of these people who have provided me with valuable information and expert views on the various issues discussed in this article: Annie Chan, Darren Conway, Sally Conway, David Crabbe, Simon Crosby, Linda Glogau, Mark Hornby, Tjitske Hunter, Nick Shackelford, Maree Shaw, Gillian Skyrme and Steve Varley. I also appreciated the insightful comments of the two anonymous reviewers.

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