



# Guidance Note: ELICOS Direct Entry

Version 2.0 (5 June 2019)

*Providers should note that Guidance Notes are intended to provide guidance only. They are not definitive or binding documents. Nor are they prescriptive. The definitive instruments for regulatory purposes remain the TEQSA Act and the Higher Education Standards Framework as amended from time to time.*

## Defining ‘ELICOS Direct Entry’

This guidance note relates to the assessment of students who are undertaking an English Language Intensive Course for Overseas Students (ELICOS) for admission into a higher education course of study through an arrangement for direct entry based on successful completion of the ELICOS.

### Focus of the guidance note

This guidance note focuses on TEQSA’s expectations of providers offering ELICOS courses which are provided under a direct entry arrangement to a tertiary education course (Part A).

It also provides guidance to higher education providers admitting students via a ELICOS direct entry arrangement and discusses relevant Standards, potential risks to quality and TEQSA’s expectations of higher education providers in this context (Part B).

## Part A: Providers of ELICOS

### Relevant ELICOS Standards

The *ELICOS Standards 2018* include a general requirement to ensure that assessment is valid, reliable, fair and clearly referenced to criteria. More specifically (Standard P4 at P4.1 c (ii)):

*in the case of ELICOS courses which are provided under a direct entry arrangement to a tertiary education course, formal measures must be in place to ensure that assessment outcomes are comparable to other criteria used for admission to the tertiary education course of study, or for admission to other similar courses of study.*

TEQSA needs to be satisfied that the ELICOS course is fit for purpose and that these requirements are met for students entering higher education on the basis of successfully completing an ELICOS direct entry program.



## Intent of ELICOS Standard

The primary intent of ELICOS Standard P4.1 c (ii) is that TEQSA can be satisfied that students who enter higher education by direct entry from an ELICOS program meet comparable English language criteria to students who enter via other means. This includes meeting the published language admission requirements using external proficiency tests such as those listed at the end of Part A of this guidance note. The intent of the Standard is that this comparability is demonstrated objectively, rather than by assertion, through rigorous and objective evidence of the ELICOS provider's assessment outcomes.

## Expectations of ELICOS Providers

TEQSA will need to be satisfied that ELICOS providers have formal mechanisms in place to demonstrate that their assessment outcomes are comparable with other criteria used for admission to the tertiary education course of study as specified in the ELICOS Standards 2018. The ELICOS provider must be able to provide evidence that a valid and reliable mechanism (or combination of mechanisms) is in place to independently demonstrate this comparability.

TEQSA must be satisfied by the robustness and rigour of the process and mechanism(s) selected. Providers are encouraged to seek guidance and support from industry peak bodies, organisations and/or relevant experts. TEQSA encourages the development of collaborative approaches among ELICOS providers, such as benchmarking and supporting documentation, to operationalise this guidance note, and will look favourably upon sector-led initiatives.

The following are recommended mechanisms. Other methods may be possible as agreed on a case-by-case basis with TEQSA, depending on the context and, as such, the list is not intended to be exhaustive.

### *i) External referencing/benchmarking*

External review may include benchmarking of various identified aspects of the ELICOS Pathway Entry program. As a minimum, it must include the explicit benchmarking of:

- assessment inputs (tasks; marking criteria/rubrics; processes)
- assessment outputs (re-examination of samples of student work and grades awarded).

### *ii) Benchmarking to validated language proficiency frameworks*

ELICOS providers may benchmark content and assessment inputs and outputs to an externally-validated language proficiency framework in order to demonstrate equivalence. Such frameworks include but are not limited to:

- Common European Framework of Reference (CEFR)
- International Second Language Proficiency Rating (ISLPR)
- Global Scale of English
- Cambridge English Scale.



### *iii) Tracer studies of student cohorts*

Cohort studies may be undertaken after students transfer to the higher education provider to evidence academic progress. Such studies should compare ELICOS Direct Entry cohorts with students in the same course of study (where applicable) or in similar courses of study who entered via other means at the required English language levels.

Supplementary qualitative studies may include feedback from former students and/or higher education academic staff on how well the ELICOS Direct Entry program is perceived to have prepared students for their higher education studies.

### *iv) External testing*

TEQSA will not require that ELICOS Direct Entry graduates undergo external testing on completion of the ELICOS program. Where external testing is used by an ELICOS provider with a sample cohort of students to provide evidence of the comparability of outcomes vis-à-vis its internal assessment framework, it should be one of the language proficiency tests accepted by the higher education provider as the basis for entry for students who do not come through an ELICOS Direct Entry arrangement.

If a sample of students is used, this will be acceptable to TEQSA provided that:

- the sample is large enough to be statistically robust
- the sample is representative of the cohort as a whole<sup>1</sup>
- the sampling method minimizes bias
- analysis of the test outcomes is valid and transparent, using established statistical methods.

TEQSA will expect comparability to be demonstrated by ELICOS providers periodically; the nature of evidence provided to demonstrate comparability will be a factor in determining the frequency of reviews. Exceptions to periodic review would be subject to individual agreement by TEQSA on a case-by-case basis. They would require, for example, a recent demonstration of comparability backed by a successful and enduring track record of demonstrated comparability that is satisfactory to TEQSA.

Providers are encouraged to ensure ongoing validation and continual improvement of course content and assessment.

## Commonly-accepted tests of English proficiency

- CAE (C1 Cambridge English: Advanced) [www.cambridgeenglish.org/](http://www.cambridgeenglish.org/)
- IELTS (International English Language Testing System) <<https://www.ielts.org/>>
- OET (Occupational English Test) <<https://www.occupationalenglishtest.org/>>
- PTE Academic (Pearson Test of English) < <https://pearsonpte.com/>>
- TOEFL (Test of English as a Foreign Language) < <https://www.ets.org/toefl/>>.

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<sup>1</sup> The sample encompasses a range of graduate abilities demonstrated in the ELICOS program and must encompass minimum passing grades. Testing of high performing graduates only would not be acceptable to TEQSA.



## Part B: Higher Education Providers

### Relevant Standards in the HES Framework

Many Standards in the *Higher Education Standards Framework (Threshold Standards) 2015* (HES Framework) are concerned with the admission of students to courses of study, either directly or indirectly. These Standards apply as much to students who enter from an ELICOS program as they do to all other students.

For a higher education provider involved in a direct entry ELICOS arrangement, the HES Framework is applicable. The Standards that are immediately relevant to direct entry include (paraphrased):

- 1.1.1 admissions policies and procedures are documented and are designed to ensure students have the English proficiency they need to succeed
- 1.1.2 students are informed of their rights and obligations
- 1.1.3 conditions of study and contractual arrangements relating to admissions are in writing
- 1.2.1 assessment of prior learning is conducted according to institutional policies
- 2.3.3 support services are informed by the needs of student cohorts
- 3.3.4 learning support services are consistent with the needs of student cohorts
- 7.2.1 information for students is available and accessible, accurate, relevant and timely
- 7.2.2 plain English information is available prior to acceptance of an offer.

Other Standards related to admissions encompass the outcomes, evaluation and improvement of admissions policies and processes (which would include direct entry from ELICOS programs). These Standards include (paraphrased):

- 1.3.5 monitoring of the progress of student cohorts (e.g. cohorts with differing entry requirements such as entry from ELICOS programs)
- 1.3.6 equivalence of opportunities for success, irrespective of entry pathway and educational background
- 5.3.7 course evaluation and improvement informing admission criteria.

### Risks to Quality

The main risks associated with direct entry arrangements arise where students who are admitted are insufficiently prepared in speaking and the use of English language to participate effectively in their chosen higher education course of study and/or to achieve the specified learning outcomes for that course.

This may result from, or be compounded by, the higher education provider:



- failing to establish the rigour and equivalence of assessment outcomes by the ELICOS provider
- failing to recognise the challenges faced by particular cohorts and individual students
- not providing sufficient or appropriate post-entry language and learning support or other support generally
- failing to manage the particular educational challenges faced by direct entry cohorts or
- not monitoring and responding to the success rates of direct entry student cohorts in comparison with other cohorts at a comparable English language level.

In the case of the direct entry arrangement, TEQSA will need to be satisfied that the arrangement is formalised, transparent to all parties involved including to students, implemented by both parties as agreed, and reviewed from time to time.

## Expectations of higher education providers

TEQSA will expect a higher education provider to satisfy itself that the students coming through the pipeline from an ELICOS provider do, indeed, have at least the same level of English proficiency as students admitted on the basis of other English language admission requirements. TEQSA will need to be satisfied that students who are admitted by direct entry or other pathway courses meet the admission criteria that are published for the course of study, or equivalent criteria. TEQSA will also expect a provider to be able to show how it has satisfied itself that claims of comparability (e.g. IELTS) made by an ELICOS provider are credible. TEQSA may wish to inspect samples of enrolment records.

TEQSA will expect a higher education provider to demonstrate that the requirements for direct entry, as manifested through a direct entry arrangement, are comparable with other pathways for entry to its higher education courses of study, especially through benchmarking assessment outcomes of these students against other cohorts completing the higher education course.

TEQSA will want to be assured that a direct entry arrangement is consistent with the HES Framework (particularly concerning admissions), especially the requirement that students have the English proficiency that they need to successfully participate in their intended course of study (Standard 1.1.1). This is the fundamental outcome that needs to be ensured.

A provider will need to demonstrate that it meets and will continue to meet the relevant requirements of the HES Framework. In particular, TEQSA will need to be satisfied that students admitted directly from an ELICOS program:

- have no known impediment to progression and completion arising from direct entry (1.1.1)
- have equivalent opportunities for success in relation to students who entered in other ways (1.3.6), and
- where direct entry may lead to educational risks, those risks are mitigated through targeted support mechanisms (2.3.1, 2.3.2).

TEQSA will expect a higher education provider to be able to provide evidence of these Standards being met from its monitoring and analysis of the progress and success of cohorts of direct entry students, compared to other cohorts in the same course of study (where applicable) or in similar courses of study.



In addition, admissions policies must be designed to ensure that admitted students have the academic preparation and proficiency in English needed to participate in their intended course of study.; Providers are required to monitor the progress of particular cohorts (1.3.5) such as ELICOS direct entry students; and the needs of student cohorts are also expected to be reflected in the support mechanisms provided (2.3.3, 3.3.4). Providers are also expected to monitor and analyse student success and reflect on and improve entry arrangements accordingly (e.g. 5.3.7), which would include arrangements for direct entry from ELICOS programs.

## Resources

Peer Review Portal <<https://www.peerreviewportal.com>>. The Peer Review Portal is an online support mechanism which individuals, education providers, industry, networks and professional associations in meeting national and international standards in external peer review. The Portal is an optional support mechanism that higher education providers can use for external referencing activity and reporting.

*TEQSA welcomes the diversity of educational delivery across the sector and acknowledges that its Guidance Notes may not encompass all of the circumstances seen in the sector. TEQSA also recognises that the requirements of the HESF can be met in different ways according to the circumstances of the provider. Provided the requirements of the HESF are met, TEQSA will not prescribe how they are met. If in doubt, please consult your TEQSA case manager.*

Version #	Date	Key changes
1.0	23 January 2019	
2.0	5 June 2019	Update to include reference to Peer Review Portal and consultation feedback (nil received).