



25 August 2023

## **A Public submission the interim report of the Australian Universities Accord**

### **Introduction**

Duolingo welcomes the interim report of the Australian Universities Accord (the Accord). We commend the vision for Australia's future higher education system, which emphasises the importance of international engagement, increased diversity of the international student cohort and ensuring a world-class student experience for all.

Duolingo's mission is to use technology to make education accessible to everyone in the world. Every day, over a billion learning exercises are completed on Duolingo's learning platform. We count among our users both royalty and refugees, demonstrating the transformative power of digital innovation in creating access and equity across education.

A higher education system for Australia's future must embrace digital innovation to be more competitive, efficient, and equitable. Our experience working with migrants, governments, and universities alike - as well as the lived immigrant experience of many of Duolingo's staff - has repeatedly shown that one of the most overlooked, yet most outdated, most expensive, and most difficult parts of an international student's journey is meeting the traditional paper-based language testing requirements. It is this experience that has led Duolingo to create the digital Duolingo English Test, which costs 80% less than comparable alternatives and is now relied on by over 4,800 of the top universities, governments, and businesses around the world.

To be clear, English language proficiency requirements serve an important function in Australia's higher education and migration policy. However, Australia's requirement for paper-based tests is both outdated and out of step with its competitors, and harmful to its international education sector.

It is for this reason that we respectfully make the following submission, with the specific goal of addressing the three policy areas identified in the interim report:

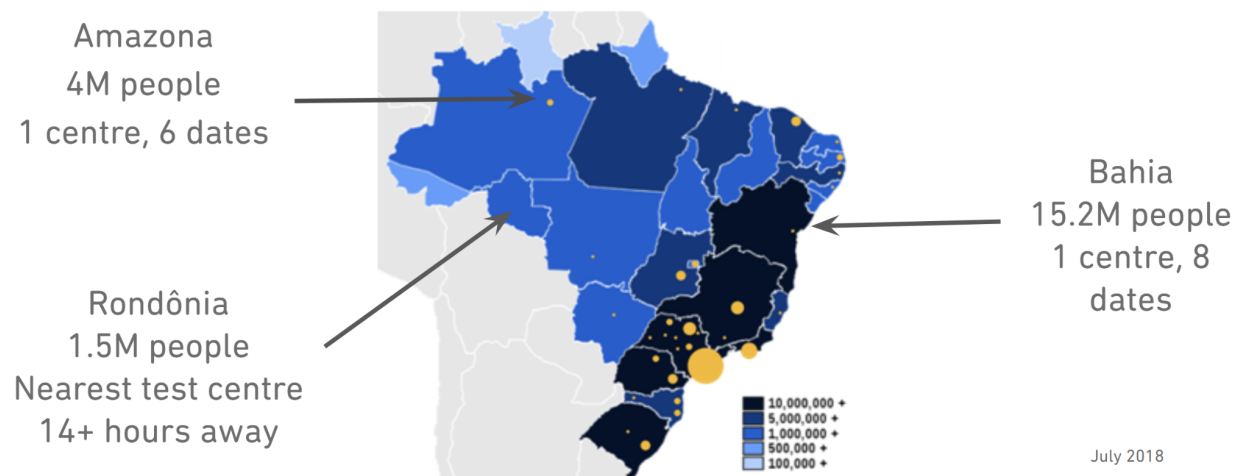
- *Providing a high-quality university experience for international students*
- *Promoting flexibility and innovation in international education, including digital and offshore delivery options*
- *Ensuring the integrity and accessibility of visa pathways for international students*

Digital tests have already significantly advanced higher education systems in other countries, resulting in more sustainable, globally accessible, and internationally competitive models. Countries like the United States (US), the United Kingdom (UK), and Canada have successfully integrated digital testing into their admissions processes, attracting a diverse pool of international students and enhancing the quality of the student experience, without sacrificing English language proficiency standards. We believe digital tests have the potential to achieve similar benefits for Australia's higher education system, contributing to the vision of the Accord.

## 1. Providing a high-quality university experience for international students

The review is considering how Australia can improve the international student experience. Like many other English-speaking countries, Australia requires prospective international students to demonstrate English language proficiency to obtain a visa. However, Australia is one of the few countries that continues to require such proficiency be demonstrated through traditional paper-based tests. This seemingly innocuous provision has a profound impact on the student experience, because paper-based testing requirements impose three substantial barriers for migration to Australia:

**Accessibility:** Sitting a paper-based test begins with finding an available test centre and appointment slot. Unfortunately, many countries have no test centres. Even well-resourced countries often only have limited capacity for test takers. The below figure (of Brazil) depicts the reach of one of the major paper-based tests relied upon by Australia, and highlights the challenges faced by migrants:



Even when a testing centre is available (geographically), capacity constraints mean that appointment slots often fill up very rapidly, requiring test takers to make plans months in advance. Any issue with that appointment (illness, transportation, or test cancellation by the

provider) could lead to months of delay, potentially costing the test taker their window to migrate.

In addition, testing centre environments create extreme barriers for students with specific neurodiversity, sensitivity or mobility issues. They place undue pressure on the test taker and risk potentially compromising their capacity to achieve a score that reflects their true ability.

**Reliability:** The COVID-19 pandemic and its associated travel bans and lockdowns have exposed the fragility of the paper-based test centre model. In many locales, public health restrictions relating to social distancing or travel made paper-based testing nearly impossible, with many Chinese test centres still remaining closed even into 2022. Human conflict (as seen in Afghanistan, Syria, and Ukraine), environmental disasters (such as the 2022 Pakistani floods), and widespread criminal fraud (such as in Vietnam in late 2022<sup>1</sup>) have also resulted in the closure of test centres, or have severely limited the ability of test takers to travel to test centre appointments.

**Affordability:** Australia requires students to pay private testing companies substantial amounts of money to take paper-based tests. On average, each test costs hundreds of dollars, more than double the average monthly salary in many countries around the world. These figures do not include travel and lodging requirements to access the test, nor do they reflect the fact that traditional paper-based tests often require even successful test takers to sit multiple iterations. Indeed, meeting this requirement often ends up as one of the most expensive parts of the migrant experience.

It is no wonder then, that research finds that Australian migrants (regardless of socioeconomic status) uniformly complained that the cost of such tests was “intolerably exorbitant” and “unaffordable to the majority” of their compatriots, and that in their view, the high cost and need for continual retakes of the test was simply a reflection of private companies’ profit-seeking from migrants without alternatives.<sup>2</sup>

One of the more contentious proposals from the interim report is a levy on international students. There has been a significant response around student equity, fairness, and Australia’s ability to compete with other countries who do not impose such a levy. It is important to consider that requiring students to travel to testing centres effectively amounts to an existing

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<sup>1</sup> Tuoi Tre News, “[Vietnamese authorities suspend foreign language exams amid quality concerns](#)” (11 Nov 2022).

<sup>2</sup> Hoang, Ngoc. (2019). Building a Validity Argument for the Use of Academic Language Tests for Immigration Purposes. *Language Education & Assessment*. 2. 135-154; M. Rumsey et al. (2016). The consequences of English language testing for international health professionals and students: an Australian case study. *Int. J. Nurs. Stud.* (reporting strong negative perception of traditional paper-based tests as too commercial, given the high cost and need for continual retakes).



levy on international students. Unlike the proposed international student levy, this current testing centre levy is not collected to fund the sector, but paid to private testing companies.

The interim report (p. 93) references that “doing what has always been done will no longer meet student needs”. The future of Australian higher education must take into consideration the extreme burdens inadequate physical test centres place on accessibility, reliability, and affordability for aspiring students, and consider digital alternatives that can overcome these barriers to meet student needs.

## **2. Promoting flexibility and innovation in international education, including digital and offshore delivery options**

The interim report (p. 93) states that in order “to achieve sustainable international education growth and protect Australia’s future interests, Australian providers need to diversify their source markets and modes of delivery.” Australia’s reliance on physical English testing centres threatens diversification and growth in flexible and innovative delivery options. Testing centres are primarily located in major cities, in key source countries. Their location in these destinations perpetuates a concentration of international student inflows from specific markets and prevents more diverse cohorts from seeking an Australian education. Transnational and online programs, which serve to enable more accessible delivery options and reach a wider range of students, are also inhibited from reaching their true global potential because students are still required to travel to testing centres to meet their English requirements.

Digital testing supports market diversification strategies, mitigating the risk of overconcentration in limited markets. This is critical to the long-term sustainability and resilience of Australia's higher education sector. Digital testing also facilitates the growth of innovative online and offshore education programs, as it aligns with their focus on accessibility. By providing a more accessible and convenient means of assessing English language proficiency, digital tests can support the development and growth of online and transnational education offerings, especially across Australia’s neighbours in the Pacific and Indonesia, which are particularly underserved by English testing centres.

Other countries have already embraced flexibility and innovation in their higher education systems by enabling the use of digital testing in their migration systems. By making use of innovations in education technology and digital security, they are able to eliminate their reliance on paper-based tests to become a more attractive destination for migrants.



For example, today, an international student seeking a student visa no longer needs to sit a paper-based English test to apply to the US, UK, Canada, Ireland or New Zealand.<sup>3</sup> As a result, thousands of universities in those countries are all able to make active use of digital tests to become more competitive:

**Table: Example of leading global universities who accept digital English tests for international student applications:**

University	Country
Harvard	USA
Yale	USA
MIT	USA
New York University	USA
University of California	USA
Princeton	USA
Stanford	USA
Imperial College London	UK
University College London	UK
University of Toronto	Canada
McGill University	Canada
University of British Columbia	Canada

These are the universities which Australian higher education institutions compete with to attract the best and brightest talent, and yet Australia finds itself at a competitive disadvantage because its visa policies prohibit Australian universities from adopting the same digital testing policies. Each year, students from nearly 200 different countries (and over 20,000 cities) take digital English tests, often because a physical test would be unaffordable or impossible to access. By allowing their universities to use digital tests for English, those governments ensure that their international education sectors attract a stronger, more diverse pool of candidates, and stay competitive globally.

Unfortunately, Australian universities cannot do the same. The Accord is considering how Australia is at risk of undermining its foothold as a destination of choice in an international

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<sup>3</sup> Governments have done so in several ways. The US, UK, Canada, and New Zealand rely on universities' assessments of students' English to grant a visa, and permit universities to in turn rely on digital tests to determine English. Ireland have themselves adopted digital tests to be acceptable in student visa applications. Finally, the UK has taken the adoption of digital tests even further and is now piloting digital English tests for all migration visas, not just student visas.



education market that is increasingly competitive (p. 93). It is clear that digital testing is a major policy area where Australia is now competitively disadvantaged with the rest of the world.

### **3. Ensuring the integrity and accessibility of visa pathways for international students**

The interim report calls for a future whereby “Educational enrolment and pathways are aligned with the migration settings and visa system to ensure that international students can contribute to Australia’s skills needs and participate successfully in a growing international community (p. 26).” Australia's exclusive reliance on testing centres to meet English language requirements for student visas is not aligned with the vision for accessible visa pathways for international students. Instead, the current system is damaging Australia’s ability to compete with other major international education destinations, including the US, UK and Canada.

This inaccessibility of visa pathways for international students imposed by testing centres is not confined to international destinations; even within Australia, many regional communities are not served by testing centres. Temporary migrants and international students seeking new visa arrangements are forced to take leave and travel to capital cities to undertake a paper-based test, at great inconvenience and cost.

Maintaining the integrity of the visa system is of enormous significance to Australia, however digital testing serves to enhance, not detract from this goal. Testing centres have a long history of being compromised by both low and high levels of sophisticated cheating attempts, for example the 2022 investigative series ‘*Trafficked*’ uncovered the systemic rorting of the English testing centre system by Australian visa applicants through organised crime networks, which involved a combination of bribing corrupt testing centre officials and paying others to sit tests on the applicant’s behalf. Testing centres are deeply flawed in this way because they are forced to rely on trusting the integrity and capacity of human proctors to verify identification and identify cheating attempts in real time, across a decentralised testing network. In contrast, digital tests employ significantly more advanced technology to monitor test-takers and prevent contact and potential collusion between proctors and test-takers. Features such as facial recognition, keystroke dynamics, and rapid verification of ID against both external ID databases and internal test history logs ensures that the person taking the test is the actual applicant. This enhances the integrity of the test results and provides a more reliable measure of English language proficiency for visa applications.

#### **Proposal for Australian student visa digital testing pilot**



We believe that a digital testing pilot, run by the Department of Home Affairs (the Department) and administered consistently across a specific cohort of university student visas, would go a long way towards addressing the issues referred to in this submission, proving the validity of the digital English testing model in the Australian context, and fulfilling the Accord's vision for Australia's future in higher education.

We respectfully propose that should an international student win acceptance to an Australian tertiary institution relying on a university-accepted digital test of English, the Department should accept that same test result for their student visa, rather than requiring them sit an additional paper-based test, provided that it continues to monitor the status and progress of the student.

Such a pilot has five key advantages:

- It enhances the competitiveness of Australian universities. Amongst their international counterparts, Australian universities are currently unique in their inability to make use of digital testing. This would enable Australian universities to compete globally for talent.
- It does not require a significant change in policy. Existing migration policy already permits many universities and students to rely on digital English tests in theory, but regulatory uncertainty leaves it infeasible in practice. By harmonising eligibility across the international education sector and reducing regulatory uncertainty, this pilot would make it feasible for universities and students to actually take advantage of existing policy.
- It is narrowly tailored towards low-risk, high-priority migrants. The only migrants affected by such a pilot are academically talented students that have already been admitted to Australian universities and demonstrated to their university's satisfaction their academic and English qualifications - a key focus of Australian migration policy.
- It provides substantial regulatory certainty while avoiding imposing mandates. Universities that do not wish to rely on digital tests are not required to; the pilot simply provides them regulatory certainty if they choose to do so.
- It provides the Department with a rich dataset on a key migration tool, while avoiding commitments or lock-in. By limiting the pilot to students and university-approved digital tests, but avoiding prescriptive requirements, the Department can gather a broad range of data (including academic results) on this key migration tool while avoiding committing itself to any particular solution.



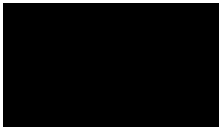
## Conclusion

Digital testing represents a simple policy change that can unlock many of the objectives outlined in the Accord interim report. It has the potential to diversify Australian international student source markets, to grow and scale the accessibility of its offshore and transnational offerings, to enhance the student experience and to embed the needs of students in day-to-day university operations (p. 26).

It is unsustainable and unfair for Australia to continue imposing substantial barriers on talented international migrants when other countries have removed them. Digital testing offers Australia a future higher education system that is more efficient, more competitive, and more equitable. Digital testing additionally offers Australia the opportunity to deepen people-to-people ties with thus far underrepresented nations both within and outside its immediate region.

We respectfully suggest that the Accord considers a greater need for digital testing and that the Department undertake a digital testing pilot for student visas to ensure that Australian higher education remains competitive on the international stage.

Sincerely,



James Holden  
Country Director, Australia & New Zealand  
[jamesholden@duolingo.com](mailto:jamesholden@duolingo.com)