



**DEFENSE SECURITY COOPERATION AGENCY**  
2800 DEFENSE PENTAGON  
WASHINGTON, D.C. 20301-2800

27 DEC 2011

MEMORANDUM FOR DEPUTY ASSISTANT SECRETARY OF THE ARMY FOR  
DEFENSE EXPORTS AND COOPERATION  
(ATTN: FMS POLICY AND RESOURCES)  
DIRECTOR, NAVY INTERNATIONAL PROGRAMS OFFICE  
DEPUTY UNDER SECRETARY OF THE AIR  
FORCE/INTERNATIONAL AFFAIRS  
(ATTN: DIRECTOR SECURITY ASSISTANCE  
INTERNATIONAL TRAINING POLICY)  
U.S. PACIFIC COMMAND, LOGISTICS ENGINEERING AND  
SECURITY ASSISTANCE DIRECTORATE  
(ATTN: SECURITY ASSISTANCE TRAINING PROGRAM  
MANAGER)  
U.S. SOUTHERN COMMAND, THEATER ENGAGEMENT  
DIRECTORATE  
(ATTN: MANAGER SECURITY ASSISTANCE TRAINING  
PROGRAMS)  
U.S. AFRICA COMMAND, SECURITY COOPERATION AND  
PROGRAMS DIRECTORATE  
(ATTN: CHIEF COMBINED EDUCATION BRANCH)  
U.S. EUROPEAN COMMAND, LOGISTICS AND SECURITY  
ASSISTANCE DIRECTORATE  
(ATTN: INTERNATIONAL MILITARY TRAINING)  
U.S. CENTRAL COMMAND, STRATEGY, PLANS, AND POLICY  
DIRECTORATE  
(ATTN: INTERNATIONAL TRAINING)  
U.S. NORTHERN COMMAND, DIRECTOR OF PLANS, POLICY,  
AND STRATEGY

SUBJECT: FY12 Country Exemption Lists for English Comprehension Level (ECL), Test of English as a Foreign Language (TOEFL), and Oral Proficiency Interview (OPI), DSCA Policy Memo 11-67

This memorandum provides the annual ECL, TOEFL, and OPI country exemptions at Attachment A. The exemption policy is based primarily on the Defense English Language Program (DELP) data analyzed by the Executive Agent for English Language Training (ELT), and the Defense Language Institute English Language Center (DLIELC). The policy has been reviewed by the staffs of Combatant Commands (COCOM), Military Departments (MILDEP), and Defense Security Cooperation Agency (DSCA), and disparate inputs have been considered.

The goal of ELT is to provide the International Military Student (IMS) with the necessary English language skills to successfully complete training, or to produce a graduate who possesses

the necessary English language skills to participate reliably in U.S. or Partner Nation (PN) operations in the future, or to operate U.S.-provided hardware safely. Language waivers should be an exception to protect U.S. or PN lives and investments. These ECL and OPI exemptions are based on the majority of a country population's use of English as a first language. This differs from English as an "official" or "primary" language as there may often be significant language differences across a broad spectrum within a country. Other significant factors include country literacy rate, national educational standards, CONUS training success rate, and ELT failure rate. DSCA reserves the right to review the exemptions lists and the process for approval annually, adding or removing countries as country-specific student performances indicate.

ECL and OPI requirements are included in the Military Articles and Services Listing (MASL) for Security Cooperation-sponsored training and are used as the basis for DLIELC training (class and duration). OPI requirements cited in MILDEP regulations or instructions must be coordinated with DLIELC prior to publication. Information on the ECL and OPI tests is available on the Defense Institute for Security Assistance Management (DISAM) International Training Management web page under DLIELC, or on the DLIELC web page.

Proper pre-departure testing is the foundation of effective ELT programming. DSCA views proper programming as a risk avoidance and mitigation tool. To avoid wasted time, funding, and goodwill, COCOMs should operate a robust in-country American Language Course Placement Test (ALCPT) program to accurately identify the candidates for subsequent ECL testing.

The COCOM will send waiver requests to this policy memorandum to DSCA, and include all background information and justifications, and statement of impact if denied. In the case of ECL/OPI waivers for IMS attending DLIELC, DSCA will coordinate with the MILDEPs and DLIELC, with a courtesy copy provided to the DLIELC Executive Agent. For ECL/OPI waivers for IMS follow on training (FOT), requests will be sent to the MILDEPs for their consideration with the FOT schools.

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Attachment:  
As stated

**FY12 COUNTRY EXEMPTION LISTS FOR ENGLISH COMPREHENSION LEVEL  
(ECL), TEST OF ENGLISH AS A FOREIGN LANGUAGE (TOEFL), AND ORAL  
PROFICIENCY INTERVIEW (OPI)**

**CATEGORY 1 - COUNTRIES EXEMPT FROM ALL IN-COUNTRY AND U.S.  
TESTING: ECL, OPI and TOEFL.**

The following countries are exempt from all in-country and U.S. testing in FY12:

- a) Antigua, Australia, Bahamas, Barbados, Belgium, Belize, Brunei, Canada, Dominica, Grenada, Guyana, India, Ireland, Jamaica, Malta, Mauritius, Netherlands, New Zealand, Norway, Singapore, St Kitts, St Lucia, St Vincent, Trinidad and Tobago, and United Kingdom
- b) Security Cooperation Offices (SCOs) have the option of conducting ECL or other testing regardless of country exemption if concerned with the IMS' English-language capabilities.

**CATEGORY 2 - COUNTRIES EXEMPT FROM IN-COUNTRY ECL TESTING.**

The following countries are exempt from all in-country ECL testing in FY12:

- a) Austria, Bangladesh, Botswana, Denmark, Fiji, Finland, France, Gambia, Germany, Ghana, Iceland, Israel, Italy, Kenya, Lesotho, Luxembourg, Malawi, Malaysia, Nigeria, Pakistan, Papua New Guinea, Philippines, Samoa, Sierra Leone, Solomon Islands, South Africa, Spain, Sri Lanka, Suriname, Swaziland, Sweden, Switzerland, Tonga, and Zambia
- b) IMS from Pakistan and Kenya who are scheduled for senior Professional Military Education (PME) courses are also exempt from all in-country and U.S. testing of ECL, OPI and TOEFL.
- c) SCOS should appropriately annotate the student Invitational Travel Order (ITO) to indicate the student is exempt from in-country ECL testing, but is required to take an ECL test upon arrival at the first training installation in the U.S.
- d) In-country ECL testing may be required for critical courses or if a Specialized English Training (SET) waiver is requested.
- e) SCOs have the option of conducting ECL testing regardless of country exemption if concerned with the student's English language capabilities.
- f) Students from Israel scheduled for senior PME courses are required to take in-country ECL tests.
- g) ECL-exempt countries can request internet-based ALCPT to establish candidates' eligibility for required OPI testing. Submit internet based testing request via e-mail to DLI. Internet-based testing is available on a case-by-case basis under the following conditions:
  - 1) Whether the country is ECL and/or OPI exempt and does not have an active ECL test site;

- 2) Whether the country can provide a test control officer (in accordance with DLIELC Instruction 1025.15), to provide access to the candidate in U.S. facility, or U.S.-run facility, and remain in the room during testing; or
- 3) Whether the U.S. facility has the appropriate internet capability.

### **CATEGORY 3 - COUNTRIES EXEMPT FROM IN-COUNTRY OPI TESTING.**

The following countries are exempt from in-country OPI testing in FY12:

- a) Austria, Botswana, Denmark, Finland, France, Germany, Greece, Israel, Italy, Luxembourg, Portugal, Spain, Sweden, and Switzerland
- b) The OPI is an oral complement to the ECL; it is a time-consuming and labor-intensive process and should be requested judiciously. Therefore, ECL-exempt countries in FY12 should administer an ALCPT to screen candidates prior to requesting a telephonic OPI.
- c) For countries listed in this category, SCOs will mark the ITOs to indicate that the student is exempt from in-country OPI testing only.
- d) Students from countries listed in this category are required to take a DLIELC-administered OPI test upon arrival at the first training installation in CONUS. Test Control Officers should schedule the OPI as soon as a qualifying ECL score is achieved. SCOs may require an OPI if concerned with student language capabilities.
- e) DSCA strongly encourages SCOs to schedule in-country OPI tests for all candidates with an OPI requirement that exceeds 2, since levels 2+ and above require extensive language training time. If the SCO elects to OPI test a candidate in country, the SCO must ensure that the candidate has achieved the minimum FOT ECL requirement on in-country ECL prior to scheduling the OPI.
- f) Students from all non-exempt countries enrolled in the Public Affairs Qualification Course (MASL B164590) or the Public Affairs Qualification Course for International Students (MASL B164601) are required to take an in-country OPI test.
- g) ECL-exempt countries can request internet-based ALCPT to establish candidates' eligibility for required OPI testing. (See instructions in Category 2, paragraph g.)
- h) If in-country OPI testing is required for a SET waiver, candidate must meet required in-country ECL/ALCPT prior to scheduling OPI.
- i) Students from Category 3.a. countries must continue to demonstrate appropriate proficiency skills during training or country exemption will be withdrawn. SCOs from countries that are exempt from in-country OPI testing should ensure their students are language qualified. Forfeiture charges will apply when a student's failure to qualify on direct-entry OPI testing results in rescheduling or cancellation of training.

### **IN-COUNTRY ECL TESTING GUIDELINES:**

- a) Students from all countries not listed above in Categories 1.a and 2.a will take an in-country ECL.

- b) In-country ECL testing may be required for specific critical courses or if a SET waiver is requested.

**TOEFL GUIDELINES:**

- a) Students from non-exempt countries (all countries except those listed in paragraph 1.a of this memorandum) must meet the TOEFL requirements established for admission to graduate programs offered by several Department of Defense (DoD) institutions.
- b) The test is administered in paper-based (PBT) or internet-based (iBT) form.
- c) Scores are valid for two years from the date of the test and must be current when the student reports to the institution.
- d) Admission testing requirements are as follows (required scores refer to PBT/iBT test forms):

- 1) Naval Post Graduate School (NPS) (TOEFL institution code 4831): 560/83

Note: For candidates applying for entry into the Department of National Security Affairs (curricula 681-693), an iBT score of 90 or higher is required. Requests for exemptions will be considered on a case-by-case basis. Candidates for PhD programs or accelerated programs are required to score a minimum of 100 on the iBT. Waivers will be considered on a case-by-case basis for scores between 90 and 100 based on the overall application package.

Test Equivalency Scores:

- Paper based – 560/iBT 83
- Paper based – 577/iBT 90
- Paper based – 600/iBT 100

- 2) National Defense University (TOEFL institution code 7026): 560/83
- 3) Army War College: Resident Program (TOEFL institution code 8274): 560/83
- 4) Army War College: Distance Education Program (TOEFL institution code 8274): 560/83
- 5) Air Force Institute of Technology (TOEFL institution code 1827): 540/76
- 6) Marine Corps University: Marine Corps War College, Marine Corps University International Fellows Program, School of Advanced Warfighting, Marine Corps Command and Staff College (TOEFL institution code 1453): 560/83
- 7) Air University: Air War College, Air Command and Staff College (TOEFL institution code 9069): 560/83

- 8) National Defense University, Army War College, Marine Corps Command and Staff College, Air War College, and Air Command and Staff College resident courses require the TOEFL only if student is pursuing a Master's degree.
- 9) DLIELC offers an Advanced Language Proficiency Skills (ALPS) III course, MASL D177022, with an emphasis on critical thinking, techniques for improving cultural and performance competence, honing academic language skills, and further development of academic writing skills. For students needing to take the TOEFL for FOT, they should take the iBT TOEFL in-country and receive a minimum score of 70. To enter the ALPS III course the applicant must have a 90 ECL and an OPI rating of 2+/2 or 2/2+. To receive a diploma from this course the student must achieve an iBT TOEFL score of 78. All students entering this course will take the iBT TOEFL at least once.

**ADDITIONAL POLICY GUIDANCE REGARDING ENGLISH LANGUAGE TESTING:**

- a. All students entering DLIELC must have a minimum entry ECL score of 55 as a means to mitigate excessive ELT duration, and to increase the likelihood that students will progress as scheduled. SCOs should recommend those IMSs who achieve ECL scores under 55 attend in-country ELT programs so that extended DLIELC training duration does not waste IMET or other U.S. or PN funds. DSCA will carefully review waiver requests for an under 55 ECL score based on two factors: (1) the need for the IMS to attend DLIELC classes versus the country's ability to delay until the IMS can attain the 55 ECL score by taking in-country ELT; and (2) DLIELC student and instructional capacity.
- b. Students from all categories of test-exempt countries discussed above must continue to demonstrate English-language proficiency during training. Failure to do so could result in their country's exemption status being withdrawn by DSCA.
- c. NATO-sponsored students testing exemptions are based on their individual country standing.
- d. The ECL test or ALCPT should be available in order to screen OPI candidates to determine whether IMS has achieved the minimum FOT ECL requirement prior to requesting an OPI, and to assess specific cases which seem questionable.
- e. As appropriate, SCOs for non-exempt countries will schedule a telephonic OPI with DLIELC as early as practicable. OPI candidates must first satisfy ECL requirements to qualify for a telephonic OPI.
- f. All applicable forfeiture charges will be applied when a student's failure to meet the prerequisite ECL on the "U.S. direct-entry ECL tests" results in rescheduling or cancellation of the direct-entry training and/or subsequent training track lines due to language deficiency. Forfeiture charges will also be applied when students attending English language training at DLIELC fail to meet the language requirement for FOT, resulting in rescheduling or cancellation of the FOT slot.

- g. SCOs or leadership at CONUS training sites have the option of conducting ECL testing regardless of in-country exemption if concerned with the student's capabilities.
- h. MILDEP and COCOM leadership should work with SCOs to initiate replacing paper-based ECL testing with DLIELC's current web-based testing, wherever adequate IT infrastructure is available. Additional information on the web-based testing program will be provided to the COCOMs for their planning efforts.
- i. Exemptions from in-country ECL testing and in-country OPI testing do not apply to exercises and competitions, ship crew training, and training at civilian institutions which may require language testing in accordance with standards established by the U.S. host organization. These language prerequisites and testing requirements may be referenced in the message invitation announcing the exercise, competition, ship crew training, or training at civilian institutions, and are defined in the applicable training plan and/or Letter of Offer and Acceptance.
- j. Any request to waive testing requirements for exercises or competitions will be directed to the U.S. sponsoring organization.