

26 AUG 2013

MEMORANDUM FOR DIRECTOR, AIR FORCE LANGUAGE, REGION AND CULTURE OFFICE

SUBJECT: FY14 Country Exemption Lists for English Comprehension Level (ECL), Test of English as a Foreign Language (TOEFL), and Oral Proficiency Interview (OPI), DSCA Policy Number 13-66

This memorandum provides the annual ECL, TOEFL, and OPI country exemptions at TAB 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 wasting 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, 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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Jennifer N. Zakriski Principal Director

Attachment: As stated

FY14 COUNTRY EXEMPTION LISTS FOR ENGLISH COMPREHENSION LEVEL (ECL), TEST OF ENGLISH AS A FOREIGN LANGUAGE (TOEFL), AND ORAL PROFICIENCY INTERVIEW (OPI)

This policy remains in effect until subsequent FY policy is published.

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 FY14:

- 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. IMS from Austria, Denmark, Germany, Kenya, Pakistan, Sweden and Switzerland, and 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. 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 FY14:

- 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, Uganda and Zambia
- b. 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.
- c. In-country ECL testing may be required for critical courses or if a Specialized English Training (SET) waiver is requested.
- d. SCOs have the option of conducting ECL testing regardless of country exemption if concerned with the student's English language capabilities.

e. Students from Israel scheduled for senior PME courses are required to take in-country ECL tests.

ECL-exempt countries can purchase ALCPT forms to establish candidates' eligibility for required OPI testing. Information on how to order ALCPT forms is available on the DLIELC website (http://www.dlielc.edu/).

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

The following countries are exempt from in-country OPI testing in FY14:

- 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 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 DLIELCadministered 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 use ALCPT to establish candidates' eligibility for required OPI testing.
- h. If in-country OPI testing is required for a SET waiver, candidate must meet required incountry 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 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
 - 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 TOEFL course, MASL D177022, with an emphasis on critical thinking, techniques for improving cultural and performance competence, honing academic language skills, and developing enhanced academic writing skills. To enter the ALPS III TOEFL course, the applicant must have an 85 ECL and an OPI rating of 2/2. Students who need a TOEFL score for entry into their FOT should take the TOEFL iBT in-country, if possible, and score a minimum of 70. All students scheduled for FOT with a TOEFL requirement must achieve a minimum TOEFL iBT score of 78 while at DLIELC to receive a diploma; these students will take the TOEFL iBT at least once during the course.

PME PREP, MASL IIN D177014

This is a new course starting in FY13, and is designed for IMS who will attend senior PME courses with their US counterparts. The entry requirement is an ECL of 80 or higher. Army requires this course for students scheduled for CGSOC (ILE), with students from categories 1 and 2 exempt. Others must provide significant rationale (above and beyond the required 80 ECL) for an exemption.

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 in coordination with the DELP EA 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 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 English language capability necessary to achieve academic success.
- h. MILDEP and CCMD leadership should work with SCOs to initiate replacing paper-based ECL testing with Defense Manpower Data Center-delivered (online) ECL testing, wherever adequate IT infrastructure is available. Additional information on the webbased testing program will be provided to the CCMDs 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. Country Liaison Officers (CLOs) assist with administrative details related to IMS from the CLO's country. In order to assist their students in the United States, CLOs must possess the English language skills necessary to fully participate in conversations, express facts, instructions, describe, report on, and provide narration about current, past and future activities of their students. CLOs are required to score an 80 on the ECL as well as an OPI requirement of 2/2. The OPI requirement will be included in the supplemental conditions of future LOAs.
- k. Any request to waive testing requirements for exercises or competitions will be directed to the U.S. sponsoring organization.