

### **DEFENSE SECURITY COOPERATION AGENCY 2800 DEFENSE PENTAGON**

WASHINGTON, D.C. 20301-2800

21 OCT 2014

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

SUBJECT: Fiscal Year 2015 Country Exemption Lists for English Comprehension Level (ECL), Test of English as a Foreign Language (TOEFL), and Oral Proficiency Interview (OPI), DSCA Policy Number 14-26

This memorandum provides the annual ECL, TOEFL, and OPI country exemption lists in 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 (CCMD), Military Departments (MILDEP), and Defense Security Cooperation Agency (DSCA), and disparate inputs have been considered.

The Security Assistance Management Manual (SAMM) Table C10.T3 lists "standalone" ELT as not authorized under the International Military Education and Training (IMET) program. However, due to ongoing capacity issues at DLIELC, this "stand-alone" General English Training (GET) policy now applies to all funding sources for ELT at DLIELC. Requests for waivers to this policy must be submitted to DSCA Building Partnership Capacity Directorate, Training Division (BPC/TNG), for approval. Waiver requests must provide strong justification on why a country needs to attend stand-alone GET at DLIELC, as there are many other schools that offer general ELT. DLIELC was established to teach English language in support of DoD-sponsored follow-on-training (FOT). Additionally, if the ELT will be funded under a different funding source than the FOT's funding source, a waiver request must be submitted to DSCA BPC/TNG for approval. The Defense Security Assistance Management System (DSAMS) will not show ELT programmed in conjunction with FOT, when two different funding sources or different Letters of Offer and Acceptance (LOAs) are used. Other types of DLIELC English language courses, such as Specialized English Training (SET), Oral Proficiency Skills for Aviation (OPSAV) and Professional Military Education Preparation (PME prep) are not releasable as stand-alone English language courses, and should not be requested without identifying the follow-on DoD training that the English language course will support.

Per SAMM section C10.10.3.3, regardless of the funding source, the ECL score required for entry into general ELT at DLIELC is 55. Waiver request to send a student to DLIELC with an in-country ECL below 55 must be submitted to DSCA BPC/TNG for approval. The request must include sufficient justification, such as adequate time is programmed for the International Military Student (IMS) training at DLIELC to raise his or her ECL to meet the FOT ECL requirement; impact on funding; and FOT course schedule if the request is disapproved, or if the training is rescheduled to a later date, and the possibility for the country to nominate a replacement. The goal of ELT is to provide the IMS with the necessary English language skills to successfully complete training; 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 safely operate U.S.-provided hardware. Language waivers should be an exception to protect U.S. or PN lives and investments. These ECL and OPI exemptions are generally based on the majority of a country population's use of English as a first language. 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 webpage under DLIELC or on the DLIELC webpage.

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, CCMDs should operate a robust in-country American Language Course Placement Test (ALCPT) program to accurately identify the candidates for subsequent ECL testing.

The CCMDs will send waiver requests to this policy memorandum to DSCA BPC/TNG, and include all background information, justifications, and statement of impact if requests are denied. In the case of ECL and OPI waivers for IMSs attending DLIELC, DSCA will coordinate with the English Language Training Executive Agent, and DLIELC. For ECL/OPI waiver requests for direct entry to follow-on training (FOT), the CCMDs will submit the requests to the MILDEPs for consideration with the FOT schools.

The DSCA POC for this memo is Kathy Ton, kathy.ton@dsca.mil, 703-604-6611.

Robert H. Drumm, Jr. Principal Director for

**Building Partnership Capacity** 

Attachment: As stated

# FISCAL YEAR 2015 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 IN-COUNTRY AND U.S. TESTING: ECL, OPI AND TOEFL.** The following countries are exempt from all in-country and U.S. testing in FY15:

- a. Antigua, Australia, Bahamas, Barbados, Belgium, Belize, Brunei, Canada, Denmark, 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. International Military Students (IMS) from Austria, 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 FY15:

- a. Austria, Bangladesh, Botswana, 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 incountry ECL tests. ECL-exempt countries can purchase American Language Course Placement Test (ALCPT) forms to establish candidates' eligibility for required OPI testing. Information on how to order ALCPT forms is available on

the Defense Language Institute English Language Center (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 FY15:

- a. Austria, Botswana, 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 DLIELC-administered OPI, upon arrival at the first CONUS training installation. Test Control Officers should schedule the OPI, as soon as a qualifying ECL score is achieved. SCOs may require an OPI, if concerned with IMS' 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 follow-on training (FOT) ECL requirement on the 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 incountry OPI.
- g. ECL-exempt countries can use the ALCPT to establish candidates' eligibility for required OPI testing.
- h. If in-country OPI testing is required for a SET waiver, candidates must meet required in-country ECL/ALCPT, prior to scheduling OPI.
- i. Students from Category 3a. countries must continue to demonstrate appropriate proficiency skills during training or country exemption will be withdrawn. SCOs from countries exempt from in-country OPI testing should ensure their IMSs are language qualified. Forfeiture charges will apply when an IMS'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 incountry ECL.
- b. In-country ECL testing may be required for students from countries listed in Categories 1 and 2 for entry into 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 a 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 incountry, 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.
- (10) The TOEFL is not required for IMS having a Baccalaureate or Master's degree from a U.S. university, a university in a TOEFL-exempt country, or a university in which the instruction was conducted in English.

## PROFESSIONAL MILITARY EDUCATION PREPARATION (PME PREP), MASL IIN D177014, GUIDELINES:

This DLIELC course is designed for IMSs, who will attend senior PME courses with their U.S. counterparts. The entry requirement is an ECL of 80 or higher. Army requires this course for students scheduled for the Command and General Staff Officers' Course, Intermediate Level, with students from Categories 1 and 2 exempt. Others must provide significant rationale (above and beyond the required 80 ECL) for an exemption.

#### ADDITIONAL GUIDANCE FOR 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 that 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 Partner Nation funds. DSCA, in coordination with the DLIELC Executive Agent, 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 the 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. With the exception of students from countries in category 1, in-country and direct-entry ECL tests are required of students from all other countries.
- 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 may conduct ECL testing regardless of in-country exemption, if concerned with the student's English language capability necessary to achieve academic success.
- h. Military Departments (MILDEPs) and Combatant Commands (CCMDs) leadership should work with SCOs to initiate replacing paper-based ECL testing with Defense Manpower Data Center-delivered (online) ECL testing, wherever adequate information technology infrastructure is available. Additional information on the web-based 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 (LOA). Requests to waive testing requirements for exercises or competitions will be directed to the U.S. sponsoring organization.
- j. Country Liaison Officers (CLOs) assist with administrative details related to IMSs 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 and instructions, as well as 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.