



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

16 JAN 2019

MEMORANDUM FOR THE EXECUTIVE AGENT, DEFENSE LANGUAGE INSTITUTE  
ENGLISH LANGUAGE CENTER (AF/A1D)

**SUBJECT:** Country Exemption Policy for English Comprehension Level (ECL), Test of English as a Foreign Language (TOEFL), and Oral Proficiency Interview (OPI), Defense Security Cooperation Agency (DSCA) Policy 19-01

This memorandum provides the country exemption policy for ECL, TOEFL, and OPI, and will remain in effect indefinitely until superseded by another DSCA exemption policy memo. Exemption policy is based analysis of Defense English Language Program (DELP) data provided by the Military Departments' (MILDEP) Security Cooperation Training organizations and Defense Language Institute English Language Center (DLIELC).

Foreign Military Sales (FMS) host-nation funded students may be programmed for stand-alone General English Training (GET) at DLIELC. For International Military Education and Training (IMET) and Foreign Military Financing (FMF)-funded students, stand-alone GET seats at DLIELC are available by request for DSCA waiver. Waiver requests must be submitted to DSCA Directorate of Building Partner Capacity, Institutional Capacity Building Division (DSCA BPC/ICB) for approval. DLIELC Specialized English Training (SET), Oral Proficiency Skills for Aviation (OPSAV), and Professional Military Education Preparation (PME prep) are not available as stand-alone English language courses regardless of the funding source. These courses should not be requested without identification of the DoD follow-on training (FOT). Additionally, if the English language course will be funded with a source different from the FOT funding source, DSCA approval is required and must be annotated in the Defense Security Assistance Management System (DSAMS) by the MILDEP Country Manager. DSAMS does not allow English language training to be programmed without FOT when two different funding sources or different FMS/FMF case funds are used.

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. Requests to waive the 55 entry ECL must be submitted to the Combatant Command (CCMD) for endorsement and forwarded to DSCA BPC/ICB for approval. The goal of ELT is to provide the International Military Student (IMS) with the necessary English language skills to successfully complete FOT training; to produce a graduate who possesses the necessary English language skills to participate reliably in the U.S. or Partner Nation's (PN) operations; or to safely operate U.S.-provided hardware.

ECL waivers are granted as exceptions, to protect U.S. or PN personnel and investments. The attached exemption list for ECL, OPI, and TOEFL is generally based on the majority of a country's population's use of English as a first language. DSCA reserves the right to review the exemption list 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 DoD-sponsored training, and are used as the basis for DLIELC training (level 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 of Security Cooperation Studies (DISCS) 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 DSCA BPC/ICB, and include all background information, justifications, and statement of impact if requests are denied. In the case of ECL and OPI waivers for IMS attending DLIELC, DSCA will coordinate with the English Language Training Executive Agent and DLIELC. A fillable ECL waiver request form for DLIELC training is available in SAN/SC-TMS under the Forms tab. For direct entry to FOT CCMDs should forward the ECL/OPI waiver requests to the MILDEPs for approval and coordination with the schools.

The DSCA POCs are Ms. Kathy Ton, (703) 697-9316, [khanh.t.ton.civ@mail.mil](mailto:khanh.t.ton.civ@mail.mil), and Mr. Jim McGaughey, (703) 697-9666, [james.p.mcgaughey.civ@mail.mil](mailto:james.p.mcgaughey.civ@mail.mil).



Robert Helfant  
Principal Director  
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Attachment:  
As stated

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**Attachment to Country Exemption List for ECL, TOEFL, and OPI Exemption Memorandum  
dated January 16, 2019**

**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:

- a. Antigua, Australia, Bahamas, Barbados, Belgium, Belize, Brunei, Canada, Denmark, Dominica, Finland, Grenada, Guyana, India, Ireland, Jamaica, Malta, Mauritius, Netherlands, New Zealand, Norway, Singapore, Sweden, St. Kitts, St. Lucia, St. Vincent, Trinidad and Tobago, and United Kingdom
- b. International Military Students (IMS) from Austria, Germany, Kenya, Pakistan, 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) 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.

**CATEGORY 2 – COUNTRIES EXEMPT FROM IN-COUNTRY ECL TESTING.** The following countries are exempt from all in-country ECL testing:

- a. Austria, Bangladesh, Botswana, Fiji, 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, Swaziland, Switzerland, 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 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.
- e. Students from Israel scheduled for senior PME courses are required to take in-country ECL tests. ECL-exempt countries can purchase American Language Comprehension 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 FY18:

- a. Austria, Botswana, 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 B174590) or the Public Affairs Qualification Course for International Students (MASL B174601) are required to take an in-country 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 in-country 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 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.
- (10) TOEFL is not required for IMS having a Baccalaureate or Master's degree from an accredited U.S. university, a university in a TOEFL-exempt country, or a university in which the instruction was conducted in English, except for the U.S. Army War College and the National Defense University. The U.S. Army War College requires TOEFL in accordance with the Army War College memorandum 350-2 for International Fellows Admission to the Master of Strategic Studies (MSS) degree resident and distant education programs (Master's degree program). The National Defense University requires TOEFL for all IMS who are seeking admission into the National Defense University Master's degree program, except those from DSCA Category 1 TOEFL-exempt countries, or those with a Baccalaureate or Master's degree from an **accredited U.S. university**, in accordance with National Defense University Instruction 1025.03 Master's Degree Admissions Policy.

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

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 Command and General Staff Officer Course (CGSOC) Intermediate Level Education (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 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 nations' 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 the exemption category for his/her country.
- 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. Military departments (MILDEP) and combatant commands (CCMD) 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.
- h. 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.
- i. Country Liaison Officers (CLOs) assist with administrative details related to IMSs from the CLO's country. In order to assist their students in the U.S., CLOs must possess the English



language skills necessary to fully participate in conversations, express facts and instructions, describe, report, and provide narration about current, past and future activities of their students. CLOs are required to score a minimum of 80 ECL as well as an OPI of 2/2 in-country prior to departure. All CLOs will be administered an entry ECL test upon arrival at the U.S. location which he/she will be carrying out duties. If 80 ECL score is not achieved, efforts must be made to attain the minimum 80 ECL and 2/2 OPI scores before assuming CLO responsibilities.