Assessment of LLN testing tools for the VET student loans program

Submitted to:  
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Department of Education and Training

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ACN: 004 398 145; ABN: 19 004 398 145

March 2017
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1 BACKGROUND

In 2015, the Australian Council for Educational Research (ACER) was commissioned by the then VET FEE-HELP Branch of the Department of Education and Training to address a number of issues related to the VET FEE-HELP scheme.

This work was part of Federal government reforms to the VET FEE-HELP scheme announced in March 2015 aimed at tackling the concerning behaviours and consequent damage to the reputation of the sector. VET FEE-HELP is an income contingent loan scheme that assisted students to pay for higher level VET Courses (that is, at the diploma level and above). One of the reforms announced was to introduce academic suitability requirements including a minimum level of language, literacy and numeracy (LLN) competence which students must meet prior to being accepted into a VET FEE-HELP loan assisted course.

The project included two major stages:

- establishing a minimum acceptable standard of literacy and numeracy that a person must demonstrate in order to qualify for loan assistance on entry to VET Diploma level and above courses.
- establishing criteria and processes for an independent body or organisation to assess an RTO’s LLN testing tool(s) to establish that it can reliably and validly report performance at the minimum LLN standard established in Stage 1 against the Australian Core Skills Framework.

From 1 January 2017, the VET FEE-HELP scheme was replaced by the VET Student Loans program. The VET Student Loans program retains the academic suitability requirements previously required under the VET FEE-HELP scheme.

Providers have the option of using their own LLN testing tools where providers are able to provide evidence based justification that their LLN test has been externally and independently verified as being able to reliably and validly report performance at the minimum LLN standard established against the Australian Core Skills Framework (ACSF).

1.1 Outcomes of Stage 1

The outcome of Stage 1—the standard setting procedure—was:

- The mandatory minimum entry literacy and numeracy requirements prior to learners enrolling in a VET course of study at a Diploma level or above qualification and accessing an income contingent loan is that learners need to display competence at Exit Level 3 in the Australian Core Skills Framework (ACSF) in both skill areas of Reading and Numeracy.

And it was recommended that the standard agreed above should be applied to all diplomas.
2 PROCESS

ACER established a set of criteria and a process for reviewing and evaluating the quality of LLN assessment tools that an RTO can use to reliably and validly assess that a learner has independently proved their competence at Exit Level 3 in the Australian Core Skills Framework (ACSF) in both skill areas of Reading and Numeracy.

Given that this requirement determines access or not to the VET student loan program this should be considered as an important and critical process by RTOs where the criteria established need to be implemented using not only a quality LLN assessment tool but also through implementing and undertaking quality assessment processes and practices.

2.1 Establishing the criteria for an approved LLN assessment tool

The criteria and associated descriptions for an approved LLN assessment tool are based around a project undertaken in 2012-13 by ACER for the Victorian Department of Education and Early Childhood Development that builds upon ACER’s expertise in assessment. ACER has extensive international, national and state expertise in assessment, in particular in relation to Item Response Theory (IRT) and Rasch modelling. The criteria developed in that report cover factors such as validity, reliability and fairness alongside other criteria such as whether and how an assessment tool targets and reports against the ACSF, the reporting mechanisms, and whether the instrument provides sufficient data for making the required LLN judgements against the ACSF.

The project reviewed those criteria and considered any additional requirements required to judge whether an RTO’s LLN assessment tool and its administration are sufficient to validly and reliably assess whether a learner meets the minimum required LLN standard for an income contingent loan.

2.2 The specifications for approval

Based on the set of criteria developed above, a set of specifications and questions were developed for an independent organisation or body to use to judge whether a particular LLN assessment tool fulfils the requirements.

As well as the criteria for the tool itself, ACER has also described criteria and key steps in a quality assurance process for the use and application of an LLN assessment tool by an RTO. This addresses issues related to how RTOs deliver assessments to learners, who delivers and marks assessments, under what conditions, and what records they keep.

2.3 Process for undertaking reviews/audits of LLN testing instruments

A process and system for evaluating and approving quality LLN assessment tools to best fulfil the purpose of the program has also been described and recommended, along with appropriate guidelines and checklists.

The following sections describe and develop each of the above three aspects of the process.
3 THE CRITERIA FOR AN APPROVED LLN ASSESSMENT TOOL

There are a number of issues that are pertinent in developing the criteria for evaluating the quality of an LLN assessment tool that an RTO can use to establish that a learner has independently proved their competence at Exit Level 3 in the Australian Core Skills Framework (ACSF) in both skill areas of Reading and Numeracy for access to an income contingent loan. These include:

- The use and scope of the ACSF
- Criteria for sound assessment tools
- Specific criteria for the income contingent loan program

3.1 The use and scope of the ACSF

The national standards for adult LLN in Australia is the Australian Core Skills Framework (ACSF). The minimum standard prescribed refers to levels within the ACSF, so any assessment tools used by approved course providers for the purpose of meeting the mandatory requirements for access to VET student loans must be aligned with and report against the ACSF. The minimum standard required is described as:

- The mandatory minimum entry literacy and numeracy requirements prior to learners enrolling in a VET course of study at a Diploma level or above qualification and accessing VET student loans is that learners need to display competence at Exit Level 3 in the Australian Core Skills Framework (ACSF) in both skill areas of Reading and Numeracy.

So the agreed criteria needed to provide guidance as to what is required to validly and reliably assess an exit ACSF level.

The ACSF is a complex framework and set of standards. It describes five core skills of Learning, Reading, Writing, Oral Communication and Numeracy. There are five levels of performance, each described in some detail ranging from 1 (low level) to 5 (high level). There are four performance variables: support, context, text complexity and task complexity. There are three domains of communication: personal and community, workplace and employment and education and training. In addition, each core skill has a number of performance indicators that are broken up into a large number of Focus Areas and performance features.

Why is the ACSF such a complex document? In the 21st Century the demand for, and sophistication of, literacy and numeracy skills have increased. Literacy and numeracy are no longer just the three Rs, but are sets of complex and wide ranging skills across reading, writing, speaking, listening and numeracy. The skills are dependent on the level of support, the context, text complexity and task complexity. The ACSF tries to represent this complexity across five core skills and across five wide levels of performance and now includes a pre-level 1 supplement.

The issue of how to validly and reliably assess against the ACSF will be covered under the set of criteria below.

3.2 Criteria for sound assessment tools

The evaluation criteria described in this document are drawn from earlier research conducted by ACER including the Instrument Classification Model report submitted to the Victorian Department of Education and Early Childhood Development (DEECD) by ACER in December 2012 which outlined an assessment framework for the classification and evaluation of assessments, and a consequent project undertaken in 2012-13 by ACER for
DEECD that utilised that work and developed an evaluation process and matrix and mapped a number of adult LLN assessment tools against those criteria.

ACER proposed the application of four general criteria that apply to the evaluation of all assessments and one specific criteria that is concerned with fitness for purpose for the specific context. In this case the purpose is for the assessment to help discriminate between students who do or do not meet the minimum LLN standard set for access to VET student loans.

The four general criteria are:

1. Validity
2. Reliability
3. Fairness

There is one further criteria that is specific to the intended purpose of the VET student loan program assessment:

5. Effectively and validly identifies students who are eligible for VET student loans.

3.3 Criterion 1: Validity

Validity is an overarching judgment about how effectively an assessment tool measures what it is meant to measure. This is more straightforward if the concept being assessed is clear and largely agreed to by experts. The described framework defines what is being measured (for example reading or numeracy) and the assessment provides the actual measurement (through candidates responding to questions). In this instance, validity refers to the degree to which the measures in the assessment instrument cover and represent the skills in the framework including the contexts, content, cognitive processes and the sophistication of the skills at each level.

For approved course providers the ACSF is the appropriate national framework for literacy and numeracy skills to be measured by LLN assessment tools, and in the specific situation of meeting the VET student loans minimum LLN standard, the question of validity relates explicitly to how the assessment tool measures against Exit Level 3 in the ACSF.

Evidence of validity of an assessment tool should cover both the process of writing and developing the assessment content explicitly against the ACSF, and secondly the process for validating and checking that it does what it aims to do, that is the questions and expected responses against the breadth and the different levels of the ACSF are agreed and are accurate. This could be through professional judgement based processes and/or empirically based evidence.

3.3.1 The process of writing and developing the assessment content

The process of writing and developing the assessment content validly against the ACSF requires that this is the first stage in the process—that the developers and writers understand the framework before they begin writing and know what the parameters are and what the features and scope of the agreed construct (in this case, the ACSF) requires. If this is not the case, the critical aspect of creating a valid assessment is jeopardised.

There should be evidence of an extensive process that guarantees the quality of the stimulus materials and assessment items that make up any assessment tool that is developed. This should include aspects such as:

- how the content is developed against the agreed framework, in this instance the ACSF, and how the key assessment constructs are identified and developed
• the expertise and qualifications of the personnel who write the assessment tasks and questions

• how the tasks and questions are tested and trialled, including any validation, testing and psychometric analysis that is undertaken to confirm the validity and ratings of the items against the framework

• how the final set of tasks and questions are selected through the above quality assurance processes to meet the criteria established and to therefore meet the requirements of the framework.

This should be supported by organisational experience, capacity and capability in assessment development to manage, develop and produce assessment tools including having staff available to advise re design and production of assessment content and structures, copyright issues about using stimulus materials, IT support for online delivery, psychometricians for data analysis and scale development, etc.

Evidence of the above should be available not only through the content, design and structure of the assessment itself, but in the tool’s supporting documents and should describe the quality assurance procedures that the assessment developers undertook to ensure the assessment is valid. This could include details of the writer’s experience and expertise, any expert consultation and review by LLN experts during the development of the assessment and any trialling and psychometric analysis undertaken.

This also means that using or adapting an existing assessment tool that has been written and developed for a different purpose and against a different framework and mapping the assessment tool against the ACSF after its initial development, is unlikely to create a fully valid test as critical features of the framework construct may not be addressed or assessed.

The assessment tool has to be capable of eliciting valid evidence of LLN performance against the ACSF, which in this case is against Exit Level 3 competence in both reading and numeracy.

3.3.2 What aspects of the Australian Core Skills Framework (ACSF) should be considered as part of any assessment?

As described above, the ACSF is a complex framework and set of standards. It describes five core skills of learning: reading, writing, oral communication and numeracy. The ACSF is also based around the contemporary use of English in Australia. In reading the ACSF has two indicators with either four or five focus areas in each described across the five levels, some of which have more than one performance feature. For example, at ACSF level 3 in reading there are 29 different aspects (called performance features) described alone. In numeracy, with its three indicators and various focus areas, numeracy also has large numbers of potentially different aspects which can be assessed. For example, at ACSF level 3 in numeracy there are 25 different aspects (called performance features) described.

So one challenge with assessing against the ACSF is that it is simply not possible to validly assess any single LLN core skill against the ACSF with, for example, five short, simple automatically scored online questions.

What are the key criteria to be met to validly assess against the ACSF?

The key features of the ACSF that should be considered as part of validly assessing against the framework are as follows:

• the ACSF describes the ability of a learner to engage with a range of real life texts and situations in English across the five core skills
- the Performance variables: level of support; contexts; text complexity and task complexity
- the ACSF indicators
- text types in reading
- maths content areas in Numeracy
- Focus Areas
- Domains of Communication
- the different levels of the ACSF.

*Engage with a range of real life texts and situations in English*

Any assessment against the ACSF should be based around the ability of a learner to engage with a range of real life texts and situations in English – and in this instance of undertaking those tasks in English in both Reading and Numeracy. The assessment tasks should be based on the use and understanding of stimuli and materials that are based in real life situations and contexts. Materials and stimuli may be real materials or replicas of such materials, even if extracts are used and simplified, depending on the level.

These factors are spelt out further in some of the features of the ACSF described below such as the performance variables, the types of texts and the Domains of Communication.

*The Performance variables*

In the ACSF there is a general description of four key factors that may influence an individual’s performance at any point in time across any of the core skills. At the relevant ACSF levels of 3 and 4 these are:

<table>
<thead>
<tr>
<th>LEVEL</th>
<th>SUPPORT</th>
<th>CONTEXT</th>
<th>TEXT COMPLEXITY</th>
<th>TASK COMPLEXITY</th>
</tr>
</thead>
</table>
| 3     | Works independently and uses own familiar support resources | Range of familiar contexts
Some less familiar contexts
Some specialisation in familiar/known contexts | Routine texts
May include some unfamiliar elements, embedded information and abstraction
Includes some specialised vocabulary | Tasks involving a number of steps
Processes include sequencing, integrating, interpreting, simple extrapolating, simple inferencing, simple abstracting |
| 4     | Works independently and initiates and uses support from a range of established resources | Range of contexts, including some that are unfamiliar and/or unpredictable
Some specialisation in less familiar/known contexts | Complex texts
Embedded information
Includes specialised vocabulary
Includes abstraction and symbolism | Complex task organisation and analysis involving application of a number of steps
Processes include extracting, extrapolating, inferencing, reflecting, abstracting |

*Figure 1.1: Extract from the ACSF of the Performance Variables Grid*

Given that the minimum standard is ACSF Exit Level 3, **all** of the above descriptions and features for Level 3 should be able to be met by a successful VET student loans candidate.

This would mean that an approved VET student loans LLN assessment tool would include such key elements as:

- The learner can undertake the assessment independently
• The assessment questions and contexts should include a combination of familiar and unfamiliar contexts with some level of specialisation

• The texts used should be routine, with some unfamiliar elements and embedded information, abstraction and specialised vocabulary—more than just simple familiar texts (as described at ACSF level 2)

• Tasks expected as part of the assessment should involve a number of steps and processes will include sequencing, integrating, interpreting, simple extrapolating, simple inferencing and simple abstracting.

The ACSF indicators and Focus Areas

In the ACSF the Indicators are statements that briefly describe performance at each level of the five core skills. There are two Indicators for Reading and three for Numeracy.

In Reading:

• the first Indicator describes a person’s performance in terms of goals/purposes, meaning-making and overall management of the process

• the second Indicator focuses on practical strategies to assist with achieving the desired outcomes.

In Numeracy:

• the first Indicator focuses on identifying (through reading, observing or listening) what mathematics is required

• the second Indicator focuses on mathematical procedures and processes

• the third Indicator focuses on representing and communicating the mathematics.

In the ACSF the Performance Features are grouped together against more general aspects of related skills – called Focus Areas. Each of these in turn are grouped beneath each Indicator. In Reading, for example, against Indicator 1 (Audience, purpose and meaning-making) the Focus Areas are:

• Purpose

• Complexity

• Prediction and prior knowledge

• Critical reading and text analysis

For Indicator 2 (Reading strategies) the Focus Areas are:

• Text navigation

• Comprehension strategies

• Decoding and fluency

• Syntax and language patterns

• Vocabulary

A similar range of Focus Areas exists within Numeracy. These include:

• Explicitness of mathematical information
- Complexity of mathematical information
- Problem solving processes, including estimating and reflecting
- Mathematical methods and use of tools
- Mathematical knowledge and skills: number and algebra
- Mathematical knowledge and skills: measurement and geometry
- Mathematical knowledge and skills: statistics and probability
- Written mathematical language
- Oral mathematical language
- Complexity of mathematical symbolism, representation and conventions.

At ACSF Exit level 3, a learner should be able to demonstrate competence across a number of different performance features included under each Focus Area. Whilst some can be jointly assessed, and it may not be necessary to cover all Focus Areas, it would be expected that across the whole assessment a learner can demonstrate evidence across a significant number of the Focus Areas and across all indicators in order to prove competence. The breadth and extent of this coverage will be dependent on both the cohort and the delivery mechanisms.

For example, in numeracy, the third Indicator (representing and communicating the mathematics) is more difficult to assess independently of sitting down one-on-one with the learner, although specific questions can be developed to address this indicator in both online and paper-based assessments via the Focus Areas of Written mathematical language and Complexity of mathematical symbolism, representation and conventions.

In numeracy, this also means that an assessment tool that only included a set of questions about solving sums and calculations not in context would not be a valid assessment of numeracy because as a set they do not cover or represent the Numeracy construct as described by the ACSF. This would only cover aspects of one of the Numeracy Indicators and of a limited number of the Focus Areas.

In Numeracy as part of the second Indicator, three mathematical content areas are described: number and algebra, measurement and geometry, and statistics and probability. As the VET student loans LLN assessment is a pre-training assessment, whilst it may not be necessary to cover all three mathematical knowledge areas, it would be expected that a learner can demonstrate evidence across two of the three mathematical knowledge and skill areas in order to prove competence. The focus and extent of this coverage will be dependent on the cohort and context.

This would mean that an approved VET student loans LLN assessment tool would include a range of questions that:

- collectively cover a number of different Focus Areas from both indicators in reading and the three indicators in Numeracy
- collectively address at a minimum two of the three mathematical content knowledge and skill areas in Numeracy.

**Text types in reading**

Text types play a key role in the skill of Reading with the main forms being narrative, procedural, persuasive, informative, creative, technical, regulatory and descriptive. Each is
characterised by particular structures, conventions and patterns. As well, text types may be continuous or non-continuous:

- continuous texts are defined as those in which sentences are organised into paragraphs, pages, sections and chapters
- in non-continuous texts, information is organised in graphic or diagrammatic forms such as lists, tables, graphs, maps or forms.

At Exit ACSF level 3, a learner should be able to demonstrate competence across a number of different text types.

This would mean that an approved VET student loans LLN assessment tool would:

- cover a number of different text types in Reading.

**Domains of Communication**

The ACSF includes three broad Domains of Communication for describing the breadth of contexts for potentially applying each core skill. These are:

- **Personal and community** is related to expressing personal identity and achieving personal goals, and understanding and interacting within the wider community.
- **Workplace and employment** refers to activities that an individual may be involved in as a member of an organisation or that may be conducted by someone working alone. The context includes activities and tasks such as preparing for and seeking employment; within an existing workplace, including organisational and management tasks or relating to entering a new work environment or taking on a new role.
- **Education and Training** refers to any form of structured learning. This may include learning towards a formal qualification; learning within an LLN program or learning within a community based program; and includes formal or informal on-the-job learning and training.

As learners progress from lower to higher levels of the ACSF, it is expected that they will develop increasing breadth and depth of competence within and across the different Domains of Communication. So for the purposes of assessing against exit level 3 of the ACSF it would be expected that the assessment tool included tasks from different Domains of Communication. The focus and extent of this coverage will be dependent on the cohort and context.

**The different levels of the ACSF**

A crucial step in developing and writing a valid assessment against the ACSF is determining the level of difficulty of each question that is asked and aligning this to the different levels of the ACSF.

The most sophisticated way of doing this is to use psychometrically based data of item difficulty to map each question against the different levels of the ACSF, but this relies on extensive trial data and then psychometric analysis of the performance of each question individually and then collectively. This is based on what is called Item Response Theory (IRT) and Rasch modelling. Using this method it is possible to develop an empirically based measurement scale which is aligned to a framework or set of standards, in this case the ACSF, and this can provide consistent and defensible data that can be used. In this way a combination of the empirical data can be used alongside professional judgement to establish both the ACSF mapping for individual items and for the cut points on the scale between the different ACSF levels.
However, unless an RTO or the test/assessment development organisation has access to psychometricians and their expertise in IRT, the more common way of setting the levels of the questions is through professional judgement and validation processes and then moderation of student responses.

This would mean that an approved VET Student Loans LLN assessment tool would have evidence of:

- how the tasks and questions were mapped against the different ACSF levels and confirmed via processes including trials and validation and moderation processes, and/or
- the results of any psychometric analysis based on the results of valid trials and the mapping of the items against the scale and the different ACSF levels.

How do you therefore check that an assessment tool is validly assessing against the ACSF?

As described above, evidence of validity of an assessment tool should cover both:

- the process of writing and developing the assessment content against the ACSF, and
- the process for validating and checking that it does what it aims to do – that is that the questions and expected responses against the breadth and the different levels of the ACSF are agreed and are accurate.

Ideally, the processes used for the development and mapping of the assessment content against the ACSF should be part of the assessment tool documentation. There should be evidence that the set of questions asked (including the texts/stimuli and the questions) covers the range of aspects of the ACSF described above. In summary these should include that:

- the learner can undertake the assessment independently
- the assessment questions are based around a range of real life texts and situations written in English
- the assessment questions and contexts include a combination of familiar and unfamiliar contexts with some level of specialisation
- the texts should be routine, with some unfamiliar elements and embedded information, abstraction and specialised vocabulary and more than just simple familiar texts
- the tasks expected as part of the assessment involve a number of steps and processes, and will include sequencing, integrating, interpreting, simple extrapolating, simple inferencing and simple abstracting
- collectively the questions cover a number of different Focus Areas from both indicators in reading and the three indicators in Numeracy
- collectively the questions address a minimum of two of the three mathematical content knowledge and skill areas in Numeracy.
- the content covers a number of different text types in Reading
- includes tasks from different Domains of Communication.
- the mapping against the different ACSF levels have been clearly established.

Evidence of the above would be a mapping of each question against the ACSF indicators. Similarly information about the coverage of the different Focus Areas should be available or
provided by an LLN expert. If the required information about the writing and mapping of the content against the ACSF is not publicly available, the process for validating the assessment tool against the framework needs to be requested and provided. This may also be obvious, or not, from a review and analysis of the content, design and structure of the assessment itself.

The supporting documents should also demonstrate how the assessment covers the relevant levels of the ACSF and also provide evidence of the quality assurance procedures that the assessment developers undertook to ensure the assessment is valid. This could include details of expert consultation and review by LLN experts during the development of the assessment and any trialling and psychometric analysis undertaken.

Evidence of the validity of the assessment tool would need to include an evaluation of:

- the qualifications and experience of the writers and authors in relation to each skill area and to the ACSF
- the quality assurance and validation processes used to write the content against the ACSF
- the validation and moderation processes used to check that the content was accurate against the different ACSF levels
- the content, design and structure of the assessment itself.

3.4 Criterion 2: Reliability

Reliability is an overarching judgment about how the design and implementation of the assessment work together to deliver an assessment that is likely to produce consistent results. That is, different students’ results should not be affected by them having different test administrators, different test locations, different markers or other extraneous factors.

There are two key elements to help support and guarantee reliability:

- test/assessment development processes
- administration guidelines

3.4.1 Test/assessment development processes

There are quality assurance methods that should be implemented to support reliability and there can also be statistical/empirical measures of reliability.

Evidence of the reliability of the assessment tool would need to include an evaluation of:

- how the assessment tasks were tested and trialled with a range of learners and the results against the ACSF checked and confirmed
- the marking and scoring guides (if being manually scored) and whether they can be applied consistently and reliably across different assessors/markers
- The results of any psychometric testing of the results of trials and that the measures of statistical reliability are high (e.g. >0.7).

The assessment manual and documentation should provide evidence of the range of quality assurance procedures that the assessment developers undertook to ensure the assessment is reliable. This should include:

- details of any trialling and testing of the tool across different sets of learners and markers
• evidence of any professional moderation of results undertaken
• evidence of any psychometric analysis undertaken to gather empirical evidence of the questions’ difficulties, and any psychometric measures of test reliability.

It is important that the assessment has been trialled and used with targeted group of learners – in this case including students wanting to study at Diploma level courses and above.

3.4.2 Administration guidelines

A reliable assessment has clear, simple administration instructions that are appropriate to the understanding, knowledge and skills of the administrators. The conditions of test administration, any manual scoring or marking, data management and the generation of reports all need to be clearly described and outlined. Important aspects that should be made available and evaluated include:

• Details of the conditions under which the assessment should take place, including:
  o space and set up required including specifications and set up requirements of the computers if it is a computer-based assessment
  o resources that should be made available, or are permissible e.g., calculators
  o time required and available
  o level of supervision and level of support allowed
  o proof of identification required of the learner undertaking the assessment and having completed the assessment independently.

• If the responses are to be manually marked, clear and unambiguous marking guides that set out what the responses are and what the overall result needs to be to make the decision about whether the learner responses meet the minimum standard or not – and this does not mean just reference to a copy of the ACSF. There should be clear instructions so that different markers will score the same or similar responses in the same way.

• Guidelines about who can mark the assessment if it is to be manually marked – and depending on the type and content of the assessment tool, what their qualifications and experience are in relation to making such an LLN judgement

• Guidelines about how to record the results for candidates and of how to inform the candidates of their results and the outcome of the assessment process.

Evidence of this should be available in a User Guide or Administrator’s manual and/or a technical manual or report and should include how the different aspects of reliability have been implemented.

3.5 Criterion 3: Fairness

Assessments should be fair. They should be inclusive of all members of the target group. Inclusiveness may be considered in relation to gender, English speaking background, socio-cultural background and special needs.

As described above, any assessment against the ACSF should be based around the ability of a learner to engage with a range of real life texts and situations in English – and in this instance of undertaking those tasks in English in both Reading and Numeracy.

Assessments should provide all students with the same opportunity to demonstrate their skills in the areas being assessed. Students need sufficient resources, adequate time, reasonable
conditions and reasonable expectations of what might be demonstrated with transparency of process so they understand what is required and the consequences of complying or not complying.

The actions of the test administrators, the administration procedures and the contents of the assessment tools should not frighten, offend, unnecessarily rush or disturb candidates as they participate in an assessment. The cultural content should not be offensive, disturbing or confusing to candidates. The test contents should not rely on candidates having specific cultural knowledge that is not related to what is being measured.

As mentioned earlier, given that the minimum standard expected is ACSF Exit Level 3, the descriptions and features of the performance variables of the ACSF Level 3 should be able to be met by a successful VET Student Loan candidate. This would mean that an approved VET student loans LLN assessment tool should include that:

- the learner can undertake the assessment independently
- the assessment questions and contexts include a combination of familiar and unfamiliar contexts with some level of specialisation
- the texts should be routine, with some unfamiliar elements and embedded information, abstraction and specialised vocabulary and more than just simple familiar texts
- the tasks expected as part of the assessment involve a number of steps and processes, and will include sequencing, integrating, interpreting, simple extrapolating, simple inferencing and simple abstracting.

The assessment tool’s supporting documentation should include information about the intended target audience including details of any trialling and the cohort it was trialled with that demonstrates that it meets the needs of a range of learners who would be expected to apply to enrol in a Diploma level course or above and be at ACSF Level 3.

Evidence of the fairness of the assessment tool would need to include an evaluation of:

- how the assessment tasks were tested and trialled with a range of learners
- the results of any psychometric testing of the results of trials and that measures of fairness and bias have been taken into account in the selection of the pool of questions.

An important aspect of both a fair and reliable assessment is that it should have clear, simple administration instructions that are appropriate to the cohort of learners being assessed. This should include the details of the conditions under which the assessment should take place, including factors that can impact on the performance of learners and their access to the assessment. Regarding fairness this could include factors such as:

- how and where the assessment can be delivered – its setup and delivery requirements
- resources that should be made available, or are permissible e.g., calculators
- time required and available – consideration should be available for learners to have sufficient time to undertake the assessment
- level of supervision and level of support allowed – consideration should be available and guidance given to how much learners can be supported to undertake the assessment, e.g., if computer based, the level of support that can be provided regarding accessing and navigation the system and answering/responding.
3.6 Criterion 4: Well-constructed

In general terms, it would be expected that the LLN assessment tool to be used would be well constructed with quality presentation and quality and clear sets of instructions for both the learners being assessed and for the administrators of the assessment. Good assessment tasks and assessment tools should have a number of generic features that would be incorporated into their content, application and use. These should include:

- use of clear language
- clear and clean layout
- clear navigation if online
- engaging material and appearance using appropriate contexts remembering the performance features of the ACSF for ACSF level 3 indicate there should be a combination of familiar and unfamiliar contexts
- reflect the contemporary use of English in Australia
- clear and easy to apply administration guidelines
- clear and easy to apply marking and scoring guides if being manually scored.

The approval process for evaluating suitable LLN tools for VET Student Loans should incorporate reviewing the assessment tasks and supporting documentation to ensure that the assessment tasks are well constructed in relation to the above list of criteria.

3.7 Criterion 5: Effectively and validly identifies students who are eligible for VET Student Loans

The LLN assessment tool that an RTO uses has to validly and reliably establish that a learner has independently proved their competence at Exit Level 3 in the Australian Core Skills Framework (ACSF) in both skill areas of Reading and Numeracy. So in assessment terms, the cut-point is the boundary between ACSF level 3 and level 4.

Are there additional requirements in relation to this specification of an Exit level 3? The previous criteria were general criteria related to a valid and reliable LLN assessment against the Australian LLN standards, the ACSF.

The approved course provider via their LLN assessment tool needs to be able to effectively identify whether learners have skills that fall below the cut-point or have skills that are above the cut-point. The distinction between what a learner can or cannot do either side of the cut-point should be clear. A suitable assessment therefore needs sufficient questions concentrated around the level of difficulty of the nominated cut-point in order to discriminate between students who are working above or below this point. The more questions that are concentrated around the cut-point the greater the confidence that the assessment is accurately discriminating between students above or below the level. Fewer questions means less confidence.

In this instance of the VET Student Loans minimum standard of ACSF Exit Level 3, it would mean that the assessment should have good concentration of questions at ACSF levels 3 and some at ACSF level 4 in order to identify whether the learner is above or below Exit level 3. There is little value in having many questions at other levels of the ACSF.

Whilst it is possible that the same assessment tool might be used to discriminate between several cut-points at different levels of difficulty, this is usually only possible by the use of computer-adaptive assessments which are capable of providing concentrations of questions around multiple cut-points of varying levels of difficulty compared with stand-alone
assessments. An alternative is if the assessment tool is delivered one-on-one by a qualified LLN assessor, where the assessor can act as the “adaptive” feature by selecting appropriate ACSF level questions depending on the performance of the learner on the initial and then consequent tasks and questions.

Either way, in this case of assessing whether a learner is at Exit ACSF Level 3 in Reading and Numeracy, there needs to be a good number of questions around this cut-point on the ACSF.

3.7.1 How do I know if there are enough questions to make a valid and reliable assessment of ACSF Exit Level 3 competence?

First, it is therefore vital that approved course providers know the specific information about the ACSF levels of each of the questions in their chosen LLN assessment tool in order to know if it is capable of identifying whether a learner is above or below the cut-off point of ACSF Exit level 3.

Second, one or two questions at ACSF Level 3 (or 4) only would not be sufficient to make this judgment reliably and validly against the ACSF. Why not? Given that at ACSF Level 3 there are 29 different performance features to potentially cover and in Numeracy there are 25 different performance features described, there needs to be a significant number of questions included to validly cover this range of skills expected of an EXIT ASCF level learner. As stated above against the criteria of validity, at Exit ACSF level 3, a learner should be able to demonstrate competence across a number of these different performance features included under each Focus Area. Whilst many can be jointly assessed, and it may not be necessary to cover all Focus Areas, it would be expected across the set of questions that a learner can demonstrate evidence across a range of the Focus Areas in order to prove competence, and from across all indicators. The breadth and extent of this coverage will be dependent on both the cohort and the delivery mechanisms.

Psychometricians would argue that to distinguish a border between adjacent ACSF levels accurately and reliably, 20 to 25 questions across each of the two boundary levels are probably required. Whilst this may be required for high stakes assessment, the reality is that although deciding on eligibility for VET Student Loans access is an important and very significant decision, requiring this number of questions may be impractical within the VET sector. As a compromise, it is recommended that a minimum of 15 different questions in total in each of Reading and Numeracy be asked that are across ACSF Level 3 and at (beginning) ACSF level 4 in order for a valid and reliable assessment of the minimum standard be established.

Evidence of the validity of the assessment tool to effectively identify students who are eligible for VET Student Loans would therefore need to include an evaluation of:

- the number of questions included in the assessment tool that are at ACSF Level 3 and at ACSF level 4
- whether collectively the questions cover a number of different Focus Areas from both indicators in reading and the three indicators in Numeracy
- whether collectively the questions address a minimum of two of the three mathematical content knowledge and skill areas in Numeracy.
- whether the content covers a number of different text types in Reading
- whether collectively the questions include tasks from different Domains of Communication.
Information about the ACSF level, the ACSF Indicators and Focus Areas or performance features of each question may be in the user guide or technical manual for the assessment or this information may even be included in the reports. Each of the questions should be mapped to one of the levels of the ACSF based on expert judgement and validation processes and this could ideally be backed up by psychometric data about the question’s actual difficulty from trials with candidates. Greater faith can be placed in questions that have some empirical support of their ACSF level (such as empirical data about the relative difficulty of items for candidates) than those for which the matching of questions to the ACSF levels is only based on professional judgements. The process used and supporting data should be documented in the technical manual or in other support material. It may be necessary to contact the assessment provider if this information is not supplied with the assessment or with the available reports.

Information should be provided about the performance or scores required to decide that a learner has independently proved their competence at Exit Level 3 in the Australian Core Skills Framework (ACSF) in both skill areas of Reading and Numeracy for access to VET Student Loans.

- For paper-based assessments, clear guidelines and marking instructions should be provided that state the level of performance required to prove competence at Exit level 3 of the ACSF in both Reading and Numeracy and show how to validly report the outcomes against the standard
- For computer-based assessments, a user or administration manual should provide the score or level of performance required to prove competence at Exit level 3 of the ACSF in both Reading and Numeracy and reports validly report the outcomes against the standard.

3.8 Accuracy of alignment and measurement error

The assessment against Exit Level 3 in the Australian Core Skills Framework (ACSF) for access to VET Student Loans will never be an exact measurement, as even with psychometrically based assessments utilising IRT, there is always some error in test measurement. The size of the error is dependent on the number of questions asked. As mentioned above, if Item Response Theory (IRT) and Rasch modelling is used alongside professional judgement it is possible to develop an empirically based measurement scale which is aligned to a framework or set of standards, in this case the ACSF, and this can provide consistent and defensible data that can be used to determine the cut points on the scale between different ACSF levels.

However, unless an RTO or the test/assessment development organisation has access to psychometricians and expertise in IRT, the accepted, common way of setting the levels of the questions is through professional judgement and validation processes and then moderation of student responses. If the latter is the case, it is essential that any approved tool has gone through such processes. Similarly, it will be necessary that evidence gained on an individual’s performance against the minimum standard is based on a significant number of pieces of evidence, and not just a small number of questions as already discussed in the previous sections.

The tools proposed by the Federal government for determining the prescribed level of language, literacy and numeracy are the Foundation Skills Assessment Tool (FSAT) and the Core Skills Profile for Adults (CSPA). The latter tool has already been validated based on Item Response Theory (IRT) and Rasch modelling alongside professional judgement and has been approved for the VET Student Loans program.
3.9 Other issues to consider

There are a number of other factors and issues that RTOs may like to consider in their choice of a suitable LLN assessment tool for VET Student Loans purposes. Whilst these may not be mandatory and therefore not evaluated, they may be useful to consider.

3.9.1 Generic or context-based LLN assessment?

For a pre-training assessment, generic LLN assessments may well be more appropriate for use than context-specific ones. Where the learner has not yet been introduced to, nor taught, the discourse and specific contexts and content of the course, a context-based assessment may not provide accurate information on the learner’s LLN skills and abilities, or their potential to succeed in the course. A context-based LLN assessment would be more appropriate where the learners applying for the VET Student Loans course are already familiar with or working within the vocational area, or for ongoing assessment or post-assessment. The appropriateness of a generic versus a context specific assessment will be dependent on the cohort and the context.

For VET Student Loans purposes, the Exit level 3 standard in Reading and Numeracy reflects the minimum level of generic literacy and numeracy skills required in order for a learner to have the capacity to learn and to successfully undertake relevant study, work related practices and assessments at diploma level courses or above. Generic capacity to learn was considered more important as a pre-requisite for a VET student loan applicant than the specific course content demands. It should be assumed that all RTOs will meet the relevant requirements of the Standards for Registered Training Organisations (RTOs) 2015, including of LLN entry and support requirements, and thus, the provider should offer the expected levels of support to the learner to access and cope with the specific LLN demands of the qualification.

3.9.2 Online versus paper-based assessments

Online and paper-based assessments provide a choice in selecting an assessment that is appropriate for the particular purpose of the assessment, and for the target cohort and context. Both provide the opportunity to gather evidence of a learner’s LLN competence and to then focus LLN development on skills that are specifically needed by learners to build their LLN performance for personal, workplace or further study needs. Either delivery method can be used for VET student loans purposes.

However, given the purpose of the pre-training assessment for VET student loans eligibility, as explained above, where online assessments can be used, they have a number of advantages over traditional paper-based methods. One is that they can be administered to a number of learners at the same time and if they are computer adaptive therefore have the ability to target the levels of the questions appropriately, and efficiently assess validly and reliably. As well, the time required to hand-score paper-based assessments (and check for consistency of marking), compile the results against the ACSF, and record and input the results into student management systems, can take up a great deal of staff time. Online assessments are automatically scored and their results are usually immediately available, making online assessments a time and cost effective alternative to paper-based assessments.

On the other hand, one-to-one and face-to-face paper-based assessment has proven to be a popular way of assessing as it allows the assessor and learner to develop some rapport, and to discuss strengths, weaknesses and future goals. The assessor and learner are able to choose appropriate tasks from a set of assessment tasks and questions that will provide pertinent information relating to the aim of the assessment. In this type of assessment core skills like reading and numeracy can be assessed together, by choosing relevant, authentic stimuli and questions. This form of assessment also allows the assessor to observe how the learner goes about the task and how well they are able to follow instructions.
3.9.3 Efficiency of the assessment tool

Approved course providers have many demands on their time. Screening assessment tools need to be simple and effective, and easy to use with simple, clear reports. The assessment needs to have the following features:

- simple to administer
- scores responses automatically or simple manual scoring
- reports generated automatically or simple to generate
- reports identify if students are above or below the nominated cut-point
- reports on students’ strengths and weaknesses are accessible
- appropriate reports for learners, teachers and administrators.

A suitable assessment should support approved course providers to use the data effectively. If assessments are sufficiently simple and useful then they are likely to be used both to identify students, and the data about students’ strengths and weaknesses can be used to inform students’ learning plans and develop appropriately targeted strategies.

Report data must also be available for administrators in an easy to use format. Identification of students above or below the nominated cut-point on the ACSF levels should be easy to access, analyse and potentially customisable. The data and reports on students’ strengths and weaknesses should be easy to interpret and readily matched to relevant courses, and be available to administrators and teachers to guide their development of learning plans and targeted support programs and strategies.

Some particular questions to consider include:

- **Delivery and administration**
  - Is it paper-based or online? Or a combination?
  - How do students access and sit the assessment? Is it one-on-one or can it be administered in a group?
  - If online, will it work on the network?
  - How long does it take to administer?
  - What administrative support is required such as provision of student log-ins, distribution of paper-based tests, supervision etc?
  - What are the security issues?

- **Scoring and data input**
  - Is it auto-scored?
  - If it is manually scoring how long will it take to score?
  - Do markers need to be trained and what are the costs?

- **Reports and data management**
  - If scoring is manual, how are data entered?
  - How and where are the data stored?
  - Who has access? Does the data storage meet security guidelines?
  - Can data and reports be customised and how easy is this to do?
  - How much administrative support is required?
  - How easily can this data be integrated with other data?

- **Costs**
  - How many assessments are required?
  - What is the cost per assessment/core skill?
  - What are the hidden costs – staffing costs for administration time, for printing, marking, for collection and collation of data, for inputting data, etc?
4 SPECIFICATIONS FOR APPROVAL

This section distils the information from the criteria developed in the previous section into a set of specifications and requirements that should be met by an approved LLN assessment tool for the purposes of establishing that a learner has independently proved their competence at Exit Level 3 in the Australian Core Skills Framework (ACSF) in both skill areas of Reading and Numeracy for access to VET student loans.

They are organised against the five different criteria established:

1. Validity
2. Reliability
3. Fairness
4. Well-constructed
5. Effectively and validly identifies students who are eligible for VET student loans.

4.1 Criterion 1: Validity and Criterion 5: The assessment effectively and validly identifies students who are eligible for VET Student Loans

<table>
<thead>
<tr>
<th>Specifications</th>
<th>Evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>For the assessment tool to validly assess against the ACSF and meet the requirements of VET Student Loans, it needs to meet the following criteria and specifications.</td>
<td>Evidence to demonstrate that these specifications have been satisfactorily met should include the following:</td>
</tr>
<tr>
<td>The assessment is based on quality assessment development processes</td>
<td>• Well qualified and experienced adult LLN writers and authors in relation to each skill area and to the ACSF. Suitable expertise and qualifications in adult LLN would include qualifications such as the TAE80113 - Graduate Diploma of Adult Language, Literacy and Numeracy Practice or equivalent. The new unit TAELLN411 Address adult language, literacy and numeracy skills in TAE40110 is not sufficient for this purpose</td>
</tr>
<tr>
<td>The assessment uses a range of real life texts and situations in English</td>
<td>• This should be supported by evidence of organisational capacity and capability of the assessment tool developers to manage, develop and produce assessment tools</td>
</tr>
<tr>
<td>• Evidence that the assessment was written explicitly against the ACSF and not adapted from an existing assessment tool that was written and developed for a different purpose and against a different framework</td>
<td></td>
</tr>
<tr>
<td>• Evidence of how the tasks and questions were tested and trialled, including the results of any validation, testing and psychometric analysis undertaken</td>
<td></td>
</tr>
<tr>
<td>• Evidence of how the final selection of tasks and questions were selected to meet the requirements of the VET Student Loans LLN assessment.</td>
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</tbody>
</table>

This is demonstrated by the descriptions of the content of the tool and access to the assessment tasks including the texts/stimuli.
<table>
<thead>
<tr>
<th>The learner undertakes the assessment independently</th>
<th>• Signed statement or personally agreed terms of conditions that state that the assessment was undertaken independently by the learner and that the responses are their own responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>The assessment questions and contexts include a combination of familiar and unfamiliar contexts</td>
<td>• This is demonstrated by the descriptions of the content of the tool and access to the assessment tasks including the texts/stimuli and the questions.</td>
</tr>
</tbody>
</table>
| Collectively the questions cover a number of different Focus Areas from both indicators in reading and the three indicators in Numeracy | • This is demonstrated by the descriptions of the content of the tool and access to the assessment tasks including the texts/stimuli and the questions.  
• Mapping of the assessment tasks and questions against the ACSF and how these cover both indicators in reading and three indicators in Numeracy and include a range of ACSF Focus Areas |
| The content covers a number of different text types in Reading | • This is demonstrated by the descriptions of the content of the tool and access to the assessment tasks including the texts/stimuli and the questions.  
• Mapping of the literacy assessment tasks and questions against the ACSF and how these cover different text types in Reading |
| Collectively the content covers a minimum of two of the three mathematical content knowledge and skill areas in Numeracy. | • This is demonstrated by the descriptions of the content of the tool and access to the assessment tasks including the texts/stimuli and the questions.  
• Mapping of the numeracy assessment tasks and questions against the ACSF and how these cover a minimum of two of the three mathematical content knowledge and skill areas in Numeracy |
| The content includes tasks from different Domains of Communication. | • This is demonstrated by the descriptions of the content of the tool and access to the assessment tasks including the texts/stimuli and the questions.  
• Mapping of the assessment tasks and questions against the ACSF and how these cover the Domains of Communication |
| The tasks and questions are validly mapped against the different ACSF levels | • Mapping of the assessment tasks and questions against the ACSF  
• Evidence of the methodology used to align the tasks and questions against the different ACSF levels (this needs to include evidence of trials, validation and moderation processes, and/or psychometric analysis) |
| A minimum of 15 different questions are included in the assessment tool that are at ACSF Level 3 and at ACSF level 4 | • This is demonstrated by the descriptions of the content of the tool and access to the assessment tasks including the texts/stimuli and the questions.  
• Mapping of the assessment tasks and |
Information is provided about the performance or scores required to decide that a learner has independently proved their competence at Exit Level 3 in the Australian Core Skills Framework (ACSF) in both skill areas of Reading and Numeracy for access to VET Student Loans.

- For paper-based assessments, clear guidelines and marking instructions are provided that state the level of performance required to prove competence at Exit level 3 of the ACSF in both Reading and Numeracy and show how to validly report the outcomes against the standard.
- For computer-based assessments, a user or administration manual provides the level of performance required to prove competence at Exit level 3 of the ACSF in both Reading and Numeracy and reports validly report the outcomes against the standard.

### 4.2 Criterion 2: Reliability

#### Specifications

For the assessment tool to validly assess against the ACSF and meet the requirements of VET Student Loans, it needs to meet the following criteria and specifications.

- The tasks and questions are validly mapped against the different ACSF levels.
- The assessment tasks were tested and trialled with a range of learners and the results against the ACSF levels checked and confirmed.
- The marking and scoring guides or rubrics (if manually scored) can be applied consistently and reliably across different assessors/markers.
- Administration guidelines include details about who can mark the assessment if it is to be manually marked and a specified set of marking information.

#### Evidence

Evidence to demonstrate that these specifications have been satisfactorily met should include the following.

- Mapping of the assessment tasks and questions against the ACSF.
- Evidence of the methodology used to align the tasks and questions against the different ACSF levels (e.g., trials, validation and moderation processes, psychometric analysis).
- Evidence of how the tasks and questions were tested and trialled, including the results of validation, testing and psychometric analysis undertaken.
- The results of any psychometric testing of the results of trials and that the measures of statistical reliability are high (e.g., >0.7).
- For paper-based assessments, clear and unambiguous guidelines and marking instructions are provided that can be used reliably by different markers (and are customised explicitly to the assessment tasks and questions, and are not a copy or extract from the ACSF).
- Clear guidelines that set out what the overall result needs to be to make the decision about whether the learner meets the minimum standard or not.
- The qualifications and experience of the markers in relation to each skill area and to the ACSF are sufficient to undertake this judgement. A qualified LLN assessor will...
and scoring rubrics are NOT provided | be someone with specific expertise and qualifications in LLN, such as the TAE80113 - Graduate Diploma of Adult Language, Literacy and Numeracy Practice or equivalent. The new unit TAELLN411 Address adult language, literacy and numeracy skills in TAE40110 is not sufficient for this purpose.

Administration guidelines include clear details of the conditions under which the assessment should take place | Clear instructions should be provided regarding:
- the set up required including any IT requirements if it is a computer-based assessment
- resources that should be made available, or are permissible e.g., calculators
- time required and available to validly undertake the assessment
- the allowable level of supervision and level of support allowed that meets the ACSF specifications for ACSF level 3

Process in place for guaranteeing that the assessed learner independently undertook the assessment themselves | • Clear instructions should be provided showing that proof of identification is required of the learner undertaking the assessment and that they have provided or agreed that they have completed the assessment independently

Administration guidelines include clear details about how to record the results for candidates and of how to inform the candidates of their results and the outcome of the assessment process | • Guidelines show how to record the results for candidates and of how to inform the candidates of their results and the outcome of the assessment process.
### 4.3 Criterion 3: Fairness

<table>
<thead>
<tr>
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</tr>
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<tbody>
<tr>
<td>For the assessment tool to validly assess against the ACSF and meet the requirements of VET Student Loans, it needs to meet the following criteria and specifications.</td>
<td>Evidence to demonstrate that these specifications have been satisfactorily met should include the following.</td>
</tr>
<tr>
<td>The assessment tasks were tested and trialled with a range of learners and checked for performance and feedback gathered from different learners</td>
<td>• The assessment tool’s supporting documentation should include information about the intended target audience including details of any trialling and the cohort it was trialled with that demonstrates that it meets the needs of a range of learners who would be expected to apply to enrol in a Diploma level course or above and be at Exit ACSF Level 3.</td>
</tr>
<tr>
<td>The tasks and questions are validly mapped against the different ACSF levels</td>
<td>• The results of any psychometric testing of the results of trials and that measures of fairness and bias were taken into account in the selection of the pool of questions.</td>
</tr>
<tr>
<td>Administration guidelines include clear details of the conditions under which the assessment should take place including allowance for special consideration where appropriate</td>
<td>• This is demonstrated by the descriptions of the content of the tool and access to the assessment tasks including the texts/stimuli and the questions.</td>
</tr>
<tr>
<td>• Mapping of the assessment tasks and questions against the ACSF</td>
<td>• Evidence of the methodology used to align the tasks and questions against the different ACSF levels (e.g., trials, validation and moderation processes, psychometric analysis)</td>
</tr>
<tr>
<td>• Clear instructions should be provided regarding:</td>
<td>• the set up required including any IT requirements if it is a computer-based assessment</td>
</tr>
<tr>
<td>• the allowable level of supervision and level of support allowed that meets the ACSF specifications for ACSF level 3</td>
<td>• resources that should be made available, or are permissible e.g., calculators</td>
</tr>
<tr>
<td>• time required and available to validly undertake the assessment</td>
<td>• time required and available to validly undertake the assessment</td>
</tr>
<tr>
<td>• the allowable level of supervision and level of support allowed that meets the ACSF specifications for ACSF level 3</td>
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</table>
**Criterion 4: Well-constructed**

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<td>Evidence to demonstrate that these specifications have been satisfactorily met should include the following.</td>
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</tbody>
</table>
| The LLN assessment tool is well constructed with quality presentation and quality and clear sets of instructions for both the learners being assessed and for the administrators of the assessment. This should include:  
  - use of clear language  
  - clear and clean layout  
  - clear navigation if online  
  - engaging material and appearance  
  - appropriate contexts remembering the performance features of the ACSF for level 3 indicate there should be a combination of familiar and unfamiliar contexts  
  - reflects the contemporary use of English in Australia. |  
  - This is demonstrated by the descriptions of the content of the tool and access to the assessment tasks including the texts/stimuli and the questions. |
| Administration guidelines include clear details of the delivery of the assessment and the conditions under which the assessment should take place |  
  - Refer to the specifications above regarding Administration guidelines under Reliability. If those conditions are met then this criteria will also be met. |
5 PROCESS FOR UNDERTAKING AUDITS OF LLN TESTING TOOLS

An independent body or approved independent and specialist personnel such as auditors, with VET experience, should undertake the audits of any LLN testing tools. Using an evidence-based approach against each of the criteria established in this document, this body or qualified individual should be responsible for checking an RTO’s LLN assessment tools and their processes used for deciding whether a prospective student wishing to access a VET Student Loan meets the minimum ACSF requirements. This audit process should be documented against the Checklist of Auditable Requirements for Foundation Skills assessments included in Appendix I. This body or qualified individuals should meet the following criteria:

- Independence from the RTO seeking approval
- Independence from developing or selling adult LLN assessment tools
- Not be involved in delivering qualifications or assessing learners related to VET FEE-HELP or VET Student Loans
- Expertise in conducting such approval or auditing processes, preferably within the VET sector
- Expertise in adult LLN assessment including with the ACSF.

In order to support and facilitate the above organisation or personnel to deliver such a process, an accompanying set of questions that can be used against each of the criteria and specifications in Section 4. This is included as Appendix I: Checklist of Auditable Requirements for Foundation Skills assessments.

To match these criteria, a set of questions and a checklist that an RTO could use to check that they have met each of the criteria and specifications and provided sufficient evidence is included as Appendix II: Evidence an RTO needs to provide for LLN testing tools to be audited and approved.
6 REFERENCES


## 7 APPENDIX I: CHECKLIST OF AUDITABLE REQUIREMENTS FOR LLN TESTING INSTRUMENTS

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Key specifications: Is there evidence of the following?</th>
<th>Does the Assessment Tool meet these criteria &amp; specifications?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Criterion 1: Validity; &amp;</strong>&lt;br&gt;<strong>Criterion 5: The assessment effectively and validly identifies students who are eligible for VET student Loans</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. The assessment is based on quality assessment development processes</td>
<td>a) The adult LLN qualifications and experience of the writers and authors in relation to each skill area and to the ACSF, that demonstrates they have the skills and knowledge to write valid assessments against the ACSF. This should be supported by organisational capacity and capability of the assessment tool developers to manage, develop and produce assessment tools. Suitable expertise and qualifications in adult LLN would include qualifications such as the TAE80113 - Graduate Diploma of Adult Language, Literacy and Numeracy Practice or equivalent. &lt;br&gt;Note: The new unit TAELLN411 Address adult language, literacy and numeracy skills in TAE40110 is not sufficient for this purpose.</td>
<td>Yes ☑ No ☐ Further evidence required ☐ Details: Not demonstrated ☐</td>
</tr>
<tr>
<td></td>
<td>b) The assessment content was written explicitly against the ACSF</td>
<td>Yes ☑ No ☐ Further evidence required ☐ Details: Not demonstrated ☐</td>
</tr>
<tr>
<td></td>
<td>c) The tasks and questions were thoroughly tested and trialled, including through validation, trial testing, moderation and/or psychometric analysis. Evidence of this should be available in a Technical Manual or supporting documentation.</td>
<td>Yes ☑ No ☐ Further evidence required ☐ Details: Not demonstrated ☐</td>
</tr>
<tr>
<td>2. The learner undertakes the assessment independently</td>
<td>a) There are signed statements collected or personally agreed terms of conditions recorded that provide evidence that the learner acknowledged that they undertook the assessment independently and that the responses were their own responses</td>
<td>Yes ☑ No ☐ Further evidence required ☐ Details: Not demonstrated ☐</td>
</tr>
<tr>
<td>3. The assessment meets the requirements of assessing validly against the ACSF</td>
<td>a) Collectively the stimuli used and the questions asked in the assessment tool include:</td>
<td>Yes ☐ Yes ☐ No ☐ Further evidence required ☐ Details:</td>
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<tr>
<td>4. The tasks and questions are validly mapped against the different ACSF levels</td>
<td>a) The tasks and questions were validly aligned to the different ACSF levels and performance features through validation, trial testing, moderation and/or psychometric analysis. Evidence of this should be available in a Technical Manual or supporting documentation and should show the mapping of the assessment tasks and questions against the ACSF and how these cover the above features of the ACSF</td>
<td>Yes ☐ Yes ☐ No ☐ Further evidence required ☐ Details:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. A minimum of 15 different questions are included in the assessment tool that are at ACSF Level 3 and at (beginning) ACSF level 4</td>
<td>a) There are a minimum of 15 different questions that are at Levels 3 and 4 of the ACSF for each of Reading and Numeracy Evidence of this should be available in a Technical Manual or supporting documentation and should show the mapping of the assessment tasks and questions against the ACSF</td>
<td>Yes ☐ Yes ☐ No ☐ Further evidence required ☐ Details:</td>
</tr>
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<tr>
<td>6. Information is provided about the performance or scores required to decide that a learner has independently proved their competence at Exit Level 3 in ACSF in both Reading and Numeracy</td>
<td>a) For paper-based assessments or for computer-based assessments that are manually scored, clear guidelines and marking instructions are provided that state the level of performance required to prove competence at Exit level 3 of the ACSF in both Reading and Numeracy and show how to validly report the outcomes against the standard. Sufficient and clear detail and guidance is available. b) For computer-based assessments that are automatically scored, a user or administration manual provides the scores or level of performance required to prove competence at Exit level 3 of the ACSF in both Reading and Numeracy and reports validly the outcomes against the standard</td>
<td>Yes ☐ Yes ☐ No ☐ Further evidence required ☐ Details:</td>
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</tbody>
</table>
## Criterion 2: Reliability

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Key specifications: Is there evidence of the following?</th>
<th>Does the Assessment Tool meet these criteria &amp; specifications?</th>
</tr>
</thead>
<tbody>
<tr>
<td>7. The tasks and questions are validly mapped against the different ACSF levels</td>
<td>a) The tasks and questions were validly aligned and are individually mapped to the different ACSF levels and performance features and confirmed through validation, trial testing, moderation and/or psychometric analysis. Evidence of this should be available in a Technical Manual or supporting documentation and should show the mapping of the assessment tasks and questions against the ACSF and how these cover the features of the ACSF as set out above in 3a and 4a.</td>
<td>Yes ☐ No ☐ Further evidence required ☐ Details: Not demonstrated ☐</td>
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<td></td>
<td>b) If psychometric analysis was undertaken in relation to item difficulty, the results of any psychometric testing of the results of trials should be available and the measures of statistical reliability are high (e.g. &gt;0.7) Evidence of this should be available in a Technical Manual or supporting documentation and should show the mapping of the assessment tasks and questions against the ACSF and how these cover the features of the ACSF as set out above in 3a and 4a.</td>
<td>Yes ☐ No ☐ Further evidence required ☐ Details: Not demonstrated ☐</td>
</tr>
<tr>
<td></td>
<td>c) If no psychometric analysis was undertaken in relation to item difficulty, evidence of the trials with a range of learners, validation and moderation processes used to align the tasks and questions against the different ACSF levels is available to demonstrate that the tasks and questions were validly mapped against the different ACSF levels by well qualified and experienced adult LLN personnel knowledgeable and experienced in the ACSF (refer to 1.a above)</td>
<td>Yes ☐ No ☐ Further evidence required ☐ Details: Not demonstrated ☐</td>
</tr>
<tr>
<td>8. Administration guidelines include details about who can mark the assessment if it is to be manually marked and a specified set of marking information and scoring rubrics are provided</td>
<td>a) The qualifications and experience of the markers in relation to each skill area and to the ACSF are sufficient to undertake this judgement. A qualified LLN assessor will be someone with specific expertise and qualifications in LLN, such as the TAE80113 - Graduate Diploma of Adult Language, Literacy and Numeracy Practice or equivalent. The new unit TAELLN411 Address adult language, literacy and numeracy skills in TAE40110 is not sufficient for this purpose.</td>
<td>Yes ☐ No ☐ Further evidence required ☐ Details: Not demonstrated ☐</td>
</tr>
</tbody>
</table>
| 9. The marking and scoring guides or rubrics (if manually scored) can be applied consistently and reliably across different assessors/markers | a) **For paper-based assessments or for computer-based assessments that are manually scored**, clear and unambiguous guidelines and marking instructions are provided that can be used reliably by different markers (and are customised explicitly to the assessment tasks and questions, and are not a copy or extract from the ACSF). Sufficient and clear detail and guidance is available supported by sample answers or scripts where appropriate.  
   b) **For computer-based assessments that are automatically scored**, a user or administration manual provides the scores or level of performance required to prove competence at Exit level 3 of the ACSF in both Reading and Numeracy and reports validly the outcomes against the standard  
   c) Clear guidelines state what the overall result needs to be to make the decision about whether the learner meets the minimum standard or not | Yes ☐ No ☐ Further evidence required ☐ Details: Not demonstrated ☐ |
|---|---|---|
| 10. Administration guidelines include clear details of the conditions under which the assessment should take place | Clear instructions are available regarding:  
   a) the set up required including any IT requirements if it is a computer-based assessment  
   b) resources that should be made available, or are permissible e.g., calculators  
   c) time required and available to validly undertake the assessment  
   d) the allowable level of supervision and level of support allowed that meets the ACSF specifications for ACSF level 3 | Yes ☐ No ☐ Further evidence required ☐ Details: Not demonstrated ☐ |
<p>| 11. Process in place for guaranteeing that the assessed learner independently undertook the assessment themselves | Refer to Criteria 2.a above | Yes ☐ No ☐ Further evidence required ☐ Details: Not demonstrated ☐ |</p>
<table>
<thead>
<tr>
<th>Criterion 3: Fairness</th>
<th>Key specifications: Is there evidence of the following?</th>
<th>Does the Assessment Tool meet these criteria &amp; specifications?</th>
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<tbody>
<tr>
<td>12. The assessment tasks were tested and trialled with a range of learners and checked for performance and feedback gathered from different learners</td>
<td>a) The assessment tool’s supporting documentation includes information about the intended target audience including details of any trialling and the cohort it was trialled with that demonstrates that it meets the needs of a range of learners who would be expected to apply to enrol in a Diploma level course or above and be at Exit ACSF Level 3. Evidence of this should be available in a Technical Manual or supporting documentation and should show the mapping of the assessment tasks and questions against the ACSF and how these cover the features of the ACSF as set out above in 3a and 4a.</td>
<td>Yes [ ] No [ ] Further evidence required [ ] Details: Not demonstrated [ ]</td>
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<td></td>
<td>b) The results of any psychometric testing of the results of trials and that measures of fairness and bias were taken into account in the selection of the pool of questions. Evidence of this should be available in a Technical Manual or supporting documentation and should show the mapping of the assessment tasks and questions against the ACSF and how these cover the features of the ACSF as set out above in 3a and 4a.</td>
<td>Yes [ ] No [ ] Further evidence required [ ] Details: Not demonstrated [ ]</td>
</tr>
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<td>13. The tasks and questions are validly mapped against the different ACSF levels</td>
<td>Refer to Criteria 1a, 3a, 4a and 7a above</td>
<td>Yes [ ] No [ ] Further evidence required [ ] Details: Not demonstrated [ ]</td>
</tr>
<tr>
<td>14. Administration guidelines include clear details of the conditions under which the assessment should take place including allowance for special consideration where appropriate</td>
<td>Refer to Criteria 10 above</td>
<td>Yes [ ] No [ ] Further evidence required [ ] Details: Not demonstrated [ ]</td>
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<td>Criterion 4: Well-constructed</td>
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</table>
| 15. The LLN assessment tool is well constructed with quality presentation and quality and clear sets of instructions for both the learners being assessed and for the administrators of the assessment. | The design, structure, content and supporting documentation and user guides for the assessment tool, including the texts/stimuli and the questions:  
a) use clear language  
b) use clear and clean layout  
c) have clear navigation if online  
d) use engaging material and appearance  
e) use appropriate contexts remembering the performance features of the ACSF for level 3 indicate there should be a combination of familiar and unfamiliar contexts  
f) reflects the contemporary use of English in Australia. | Yes ☐ No ☐  
Further evidence required ☐  
Details: Not demonstrated ☐ |
| 16. Administration guidelines include clear details of the delivery of the assessment and the conditions under which the assessment should take place | Refer to Criteria 10 above | Yes ☐ No ☐  
Further evidence required ☐  
Details: Not demonstrated ☐ |
## 8 APPENDIX II: EVIDENCE AN RTO NEEDS TO PROVIDE FOR LLN TESTING INSTRUMENTS TO BE AUDITED AND APPROVED

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Evidence of the following should be made available</th>
<th>Possible source of evidence</th>
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</thead>
<tbody>
<tr>
<td><strong>Criterion 1: Validity; &amp; Criterion 5: The assessment effectively and validly identifies students who are eligible for VET student Loans</strong></td>
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<tr>
<td>1. The assessment is based on quality assessment development processes</td>
<td>a) The adult LLN qualifications and experience of the writers and authors in relation to each skill area and to the ACSF, that demonstrates they have the skills and knowledge to write valid assessments against the ACSF. This should be supported by organisational capacity and capability of the assessment tool developer to manage, develop and produce assessment tools. Suitable expertise and qualifications in adult LLN would include qualifications such as the TAE80113 - Graduate Diploma of Adult Language, Literacy and Numeracy Practice or equivalent. The new unit TAELLN411 Address adult language, literacy and numeracy skills in TAE40110 is not sufficient for this purpose.</td>
<td>Details of LLN qualifications and experience of the writers, authors and the experience, capacity and capability of the organisation. Provided: Yes ☐ No ☐</td>
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<td>b) The assessment content was written explicitly against the ACSF</td>
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<td>c) The tasks and questions were thoroughly tested and trialled, including through validation, trial testing, moderation and/or psychometric analysis.</td>
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Assessment of LLN testing tools for the VET Student Loans program
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<tr>
<td><strong>2. The learner undertakes the assessment independently</strong></td>
<td>a) Signed statements collected or personally agreed terms of conditions recorded that provide evidence that the learner acknowledged that they undertook the assessment independently and that the responses were their own responses</td>
<td>Evidence of how these statements are collected, including examples, should be available e.g. in a Technical Manual or detailed in supporting documentation. Provided: Yes ☐ No ☐</td>
</tr>
</tbody>
</table>
| **3. The assessment meets the requirements of assessing validly against the ACSF** | a) Collectively the stimuli used and the questions asked in the assessment tool include:  
  - a range of real life texts and situations in English  
  - a combination of familiar and unfamiliar contexts  
  - a number of different Focus Areas of both indicators in reading and the three indicators in Numeracy  
  - a number of different text types in Reading  
  - a minimum of two of the three mathematical content knowledge and skill areas in Numeracy  
  - tasks from different Domains of Communication. | Copies of the content of the Assessment tool provided – for online assessment logins are provided to access the assessment. Description of how the assessment content was written explicitly against the ACSF e.g. in a Technical Manual or detailed in supporting documentation and should detail the mapping of the assessment tasks and questions against the ACSF and how these cover the different features of the ACSF. Provided: Yes ☐ No ☐ |
| **4. The tasks and questions are validly mapped against the different ACSF levels** | a) The tasks and questions were validly aligned to the different ACSF levels and performance features through validation, trial testing, moderation and/or psychometric analysis. Evidence of this should be available in a Technical Manual or supporting documentation and should show the mapping of the assessment tasks and questions against the ACSF and how these cover the features of the ACSF as described above in 3a. | Description of how the assessment content was written explicitly against the ACSF including of the testing and trialling, validation, moderation and/or psychometric analysis undertaken to map the questions to the ACSF and its different levels e.g. in a Technical Manual or detailed in supporting documentation. Provided: Yes ☐ No ☐ |
| 5. A minimum of 15 different questions are included in the assessment tool that are at ACSF Level 3 and at (beginning) ACSF level 4 | a) There are a minimum of 15 different questions that are at Levels 3 and 4 of the ACSF for each of Reading and Numeracy. Evidence of this should be available in a Technical Manual or supporting documentation and should show the mapping of the assessment tasks and questions against the ACSF. | Description of how the assessment content was written explicitly against the ACSF e.g. in a Technical Manual or detailed in supporting documentation and should detail the mapping of the assessment tasks and questions against the ACSF and how there is a minimum of 15 different questions that are at Levels 3 and 4 of the ACSF for each of Reading and Numeracy. |
| Provided: | Yes ☐ No ☐ |

| 6. Information is provided about the performance or scores required to decide that a learner has independently proved their competence at Exit Level 3 in ACSF in both Reading and Numeracy | a) **For paper-based assessments or for computer-based assessments that are manually scored**, clear guidelines and marking instructions are provided that state the level of performance required to prove competence at Exit level 3 of the ACSF in both Reading and Numeracy and show how to validly report the outcomes against the standard. Sufficient and clear detail and guidance is available. | Relevant and detailed Administration and/or Marking Guides. |
| Provided: | Yes ☐ No ☐ |

<p>| b) <strong>For computer-based assessments that are automatically scored</strong>, a user or administration manual provides the scores or level of performance required to prove competence at Exit level 3 of the ACSF in both Reading and Numeracy and reports validly the outcomes against the standard | | |</p>
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<th>Criterion 2: Reliability</th>
<th>Evidence of the following should be made available</th>
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<td>7. The tasks and questions are validly mapped against the different ACSF levels</td>
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<td>Copies of the content of the Assessment tool provided – for online assessment logins are provided to access the assessment. Description of how the assessment content was written explicitly against the ACSF including of the testing and trialling, validation, moderation and/or psychometric analysis undertaken to map the questions to the ACSF and its different levels e.g. in a Technical Manual or detailed in supporting documentation. Provided: Yes ☑ No ☐</td>
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<td>b) If psychometric analysis was undertaken in relation to item difficulty, the results of any psychometric testing of the results of trials should be available and the measures of statistical reliability are high (e.g. &gt;0.7) Evidence of this should be available in a Technical Manual or supporting documentation and should show the mapping of the assessment tasks and questions against the ACSF and how these cover the features of the ACSF as set out above in 3a and 4a.</td>
<td></td>
<td>Technical Manual or detailed in supporting documentation and includes summary psychometric analysis and results. Provided: Yes ☑ No ☐</td>
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<td><strong>8. Administration guidelines include details about who can mark the assessment if it is to be manually marked and a specified set of marking information and scoring rubrics are provided</strong></td>
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<td>Detailed description of the testing and trialling with a range of learners, processes and details of LLN practitioners undertaking the validation and moderation to map the questions to the ACSF and its different levels e.g. in a Technical Manual or detailed in supporting documentation. Provided: Yes ☐ No ☐</td>
</tr>
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</table>
| **9. The marking and scoring guides or rubrics (if manually scored) can be applied consistently and reliably across different assessors/markers** | a) **For paper-based assessments or for computer-based assessments that are manually scored,** clear and unambiguous guidelines and marking instructions are provided that can be used reliably by different markers (and are customised explicitly to the assessment tasks and questions, and are not a copy or extract from the ACSF). Sufficient and clear detail and guidance is available supported by sample answers or scripts where appropriate.  
  b) **For computer-based assessments that are automatically scored,** a user or administration manual provides the scores or level of performance required to prove competence at Exit level 3 of the ACSF in both Reading and Numeracy and reports validly the outcomes against the standard  
  c) Clear guidelines state what the overall result needs to be to make the decision about whether the learner meets the minimum standard or not | Detailed Administration and/or Marking Guides. Details of LLN qualifications and experience of the markers. Provided: Yes ☐ No ☐ |
| **10. Administration guidelines include clear details of the conditions** | Clear instructions are available regarding:  
  a) the set up required including any IT requirements if it is a computer-based assessment | Detailed Administration Guides. |
| under which the assessment should take place | b) resources that should be made available, or are permissible e.g., calculators  
|                                           | c) time required and available to validly undertake the assessment  
|                                           | d) the allowable level of supervision and level of support allowed that meets the ACSF specifications for ACSF level 3 | Provided:  
|                                           |   Yes ☐ No ☐ |  

<p>| 11. Process in place for guaranteeing that the assessed learner independently undertook the assessment themselves | Refer to Criteria 2.a above | Refer to Criteria 2.a above |</p>
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<tr>
<th><strong>Criterion 3: Fairness</strong></th>
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<td><strong>12.</strong> The assessment tasks were tested and trialled with a range of learners and checked for performance and feedback gathered from different learners</td>
<td>a) The assessment tool’s supporting documentation includes information about the intended target audience including details of any trialling and the cohort it was trialled with that demonstrates that it meets the needs of a range of learners who would be expected to apply to enrol in a Diploma level course or above and be at Exit ACSF Level 3. Evidence of this should be available in a Technical Manual or supporting documentation and should show the mapping of the assessment tasks and questions against the ACSF and how these cover the features of the ACSF as set out above in 3a and 4a.</td>
<td>Detailed description of the testing and trialling with a range of learners, including validation and moderation processes to confirm reliability and fairness e.g. in a Technical Manual or detailed in supporting documentation. Provided: Yes ☐ No ☐</td>
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<td>b) The results of any psychometric testing of the results of trials and that measures of fairness and bias were taken into account in the selection of the pool of questions. Evidence of this should be available in a Technical Manual or supporting documentation and should show the mapping of the assessment tasks and questions against the ACSF and how these cover the features of the ACSF as set out above in 3a and 4a.</td>
<td>Technical Manual or detailed in supporting documentation and includes summary psychometric analysis and results. Provided: Yes ☐ No ☐</td>
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<tr>
<td><strong>13.</strong> The tasks and questions are validly mapped against the different ACSF levels</td>
<td>Refer to Criteria 1a, 3a, 4a and 7a above</td>
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<td><strong>14.</strong> Administration guidelines include clear details of the conditions under which the assessment should take place including allowance for special consideration where appropriate</td>
<td>Refer to Criteria 10 above</td>
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<td>Criterion 4: Well-constructed</td>
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| 15. The LLN assessment tool is well constructed with quality presentation and quality and clear sets of instructions for both the learners being assessed and for the administrators of the assessment. | The design, structure, content and supporting documentation and user guides for the assessment tool, including the texts/stimuli and the questions:  
a) use clear language  
b) use clear and clean layout  
c) have clear navigation if online  
d) use engaging material and appearance  
e) use appropriate contexts remembering the performance features of the ACSF for level 3 indicate there should be a combination of familiar and unfamiliar contexts  
f) reflects the contemporary use of English in Australia. | Copies of the content of the Assessment tool provided – for online assessment logins are provided to access the assessment.  
Technical Manual or detailed in supporting documentation.  
Provided:  
Yes ☐  
No ☐ |
| 16. Administration guidelines include clear details of the delivery of the assessment and the conditions under which the assessment should take place | Refer to Criteria 10 above | Refer to Criteria 10 above |