

CIVIL AVIATION DIRECTORATE
Personnel Licensing Section

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Language Testing Bodies (LTBs) – Guidance Document

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1.0 Purpose of This Document

The intention of this notice is to:

- Guide LTB's on their manual format and contents
- define the different roles of personnel that manage, conduct and/or assess language proficiency tests within a language testing body.
- establish the minimum requirements for language testing bodies engaging personnel that manage, conduct and/or assess test takers during a language proficiency test.
- establish the minimum requirements for initial and recurrent training of personnel conducting language testing.
- establish the language assessment administration records to be maintained by LTBs.
- Establish requirements for online testing

2.0 Definitions

Interlocutor	A suitably qualified and trained person with whom a test taker interacts during a language assessment to complete a speaking task.
Rater/Assessor	A suitably qualified and trained individual who assigns a score to a candidate's performance in a test based on a judgement usually involving the matching of features of the performance to descriptors on a rating scale.
Language Specialist	A rater/assessor with linguistic expertise, who shall hold or have attained language training at an accredited university or language school and has two years English language teaching experience.
Aviation Specialist	A rater/assessor with operational expertise, who satisfies one of the conditions below: <ul style="list-style-type: none">- hold or have held an ATPL or CPL pilot's license or equivalent* , or- hold or have held an air traffic controller's license <p><i>Note:</i> In accordance with ATCO.B.040, an ATCO test taker must be assessed by a suitable qualified ATC assessor or a specifically approved assessor by TM-CAD.</p> <p><i>*a PPL license holder with 350 block hours and flying experience in 3 or more ICAO states</i></p>
Language Test Development Team	Is responsible for the design, development, and maintenance of the language assessment. The team shall include individuals with an operational, test development and linguistic expertise.
Test Taker	This is the candidate taking the ICAO Language Proficiency assessment.

3.0 Language

TM-CAD will only approve courses and documentation in the English language.

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4.0 Format of Manual

There is no formal structure for the Language Testing Body’s organisations manual, however the below may be used for guidance.

Chapter	Title	Criterion number of ICAO Doc 9835, Chapter 6, EASA Aircrew and ATCO
0	GENERAL	
0.1	List of revisions	Depending on the availability of a document management system the structuring of GENERAL may vary, whereas the rest of the handbook structure (ORGANIZATION, TESTING, ASSESSMENT, DOCUMENTATION and QUALITY ASSURANCE) should be as standardized as possible. This would facilitate standardized approval and oversight even if there are several LTBs. To facilitate flexibility with any chapter, the LTBs could add more sub-chapters as deemed necessary to clarify processes and procedures.
0.2	List of abbreviations	
0.3	Scope	
0.4	Updating	
0.5	Approval by CAA/State authority	
0.6	Distribution	
1	ORGANIZATION	i.e. the process of organization; 6.3.7 (organizational information and infrastructure)
1.1	Introduction of the organization	incl. business objectives, policy and strategy 6.3.7.1 (information about its organization and its relationships with other organizations); 6.3.7.2 (all associations and links with other organizations transparent); 6.3.7.3 & EU 1178/2011 AMC1 FCL.055 (n) & AMC4 ATCO.B.040 (if the organization provides language training, clear separation between testing and training activities);
1.2	Organizational structure	incl. organization chart
1.3	Staffing	EU 1178/2011 AMC1 FCL.055 (n) (1) (i) & AMC4 ATCO.B.040 (c) incl. procedures for appropriate management/staffing, responsibilities & contact details;
1.3.1	Head of LTB	
1.3.2	Administrative matters	6.3.8.1 (test administration, i.e. registering test-takers, distributing relevant information to testing-teams etc.); 6.3.8.4 (test administrators with working knowledge of all administration guidelines of the LTB)
1.3.3	Linguistic and subject matters	i.e. main responsibilities for test development, test design and administration 6.3.8.1 (also test designer/developer); 6.3.8.2 (good familiarity with all relevant ICAO publications on LPRs); 6.3.8.3 (operational and linguistic experts form a team for test development) e.g. experienced language examiner (i.e. good knowledge of LTB’s processes/procedures and ICAO SARPS, who might be responsible for many aspects of quality assurance (chp. 5)
1.3.4	Quality Management	incl. overall policy, remedy to CAA/State authority findings 6.3.8.2 (good familiarity with all relevant ICAO publications on LPRs) <u>Note:</u> In this context, the term „Quality Management” and later the term “Quality Assurance Process” (see 5) does not mean that all the processes/procedures described in an LTB handbook must be integrated into a QMS (such as ISO 9001:2008), yet can be.
1.3.5	List of examiners	i.e. list of raters/assessors and interlocutors; 6.3.7.4 (sufficient numbers of qualified interlocutors and raters to administer the required tests); 6.3.8.2 (familiarity with all relevant ICAO publications on LPRs); 6.3.8.4 (interlocutors with working knowledge of all administration guidelines of the LTB); 6.3.8.5 (interlocutors’ language proficiency at least level 5 or level 6, if involved in level 6 testing); 6.3.8.6 (interlocutors with completed initial training); 6.3.8.7 (interlocutors with recurrent training once a year); 6.3.8.8 (interlocutors with aviation operational knowledge or language testing expertise, or both); 6.3.8.9 (at least two raters form a team/ operational & linguistic expertise); 6.3.8.10 (raters’ language proficiency at least level 5 or level 6, if involved in level 6 testing); 6.3.8.11 (raters are familiar with aviation English); 6.3.8.12 (raters with completed initial training); 6.3.8.13 (raters with recurrent training once a year);

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1.4	Testing locations	6.3.5.4 (description of the room/s in which tests are conducted, furniture and equipment) incl. general description of available locations and their preparation before testing (equipment, seating arrangements, etc.) 6.3.5.5 (testing location with moderate comfort, privacy and quiet)
2	TESTING PROCESS	incl. test administration and security cf. 6.3.5 (all contents); 6.3.2.4 (test complies with principles of good practice and a code of ethics as described in Chapter 6 of ICAO Doc 9835); 6.3.5.6 (full description of test administration policies and procedures: retaking the test, score-reporting, record-keeping, plans for quality control/test maintenance/ongoing test development and purchasing conditions); 6.3.5.8 (security measures during test administration);
2.1	Possible test-takers	6.3.2.2 (target population) i.e. who are the test-takers to be tested and on what legal basis
2.2	Test information available to test-takers	6.3.5.1 (complete sample of the test publicly available, incl. test-taker documents, interlocutor instructions/prompts, rater documentation, sample of audio recordings and a demonstration of test-taker); 6.3.5.11 (a documented policy for all aspects of test security shown in publicly available documents); incl. information for the test-taker before registering for the test, often delivered via a website (e.g. how to register, what to expect during the test/ mock exam, equipment needed, time parameters for each test task, appeal procedures, etc.)
2.3	Registration procedure	e.g. before/on the day of the test, incl. identity check and invigilation
2.4	Test formats	6.3.2.1 (test designed to assess speaking and listening proficiency in accordance with each component of the ICAO Rating Scale and the holistic descriptors); 6.3.2.3 (description of and rationale for test construct accessible to all decision-makers in plain, layperson language); 6.3.2.5 (test focus is not on discrete-point items, on grammar explicitly or on discrete vocabulary items, but rather on ability to communicate efficiently); 6.3.2.8 (test is specific to aviation operations); 6.3.2.10 (test avoids items that are designed to elicit highly technical or very context-specific language); 6.3.4.4 (if rating is conducted using new technology, including speech recognition technology, the correspondence of such rating to human rating, on all aspects of the Rating Scale, is clearly demonstrated in layperson language); & EU 1178/2011 AMC1 FCL.055 (n) (4) (ii)
2.4.1	Listening skills	6.3.2.6 (specific listening section with individual items included/ not to the detriment of assessing interaction); 6.3.2.9 (test assesses plain language proficiency in an aviation context); 6.3.5.3 (instructions to the test-taker clearly documented); 6.3.5.4 (equipment/facilities necessary for the test included in the instructions); i.e. close description of construct, task types, task focus, timing, test delivery etc.)
2.4.2	Speaking skills	6.3.2.7 (test includes voice-only interaction); 6.3.3.2 (description of development); 6.3.2.9 (test assesses plain language proficiency in an aviation context); 6.3.5.3 (instructions to the test-taker clearly documented);
2.5	Use of (various) test versions	6.3.5.9 (adequate test versions for various test-takers); 6.3.5.10 (test questions/prompts held in confidence prior to the test); incl. sufficient various, customized test versions on the day of the test (minimum number)
3	ASSESSMENT PROCESS	6.3.4.4 (new technology, e.g. remote testing, speech recognition)
3.1	Aim of assessment (objectives)	6.3.2.2 & EU 1178/2011 AMC1 FCL.055 (n) (4) (i) (aims of the test – definition of test purpose describing both the aims of the test and the target population is accessible to all decision-makers) e.g. general explanation by using ICAO holistic descriptors (and supporting national/European legal bases)

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3.2	Assessment criteria	e.g. general explanation of ICAO rating scale (and supporting legal bases) EU 1178/2011 AMC1 FCL.055 (n) (4) (iii)
3.3	Assessment Procedures	EU 1178/2011 AMC1 FCL.055 (n) (4) (v)
3.3.1	Roles during assessment	6.3.4.2 (rater team/panel) i.e. detailed description in the case of one assessor (or rater) and one interlocutor form an examination board/panel/rater team
3.3.2	Decision making	6.3.4.1 (rating process documented with audio/video recording); 6.3.2.11 (documented rating process - final score is the lowest of the scores in each of the six ICAO language proficiency skills) i.e. general description (e.g. application of ICAO Rating Scale, final rating is the lowest of the six ratings)
3.3.3	Documentation during testing	6.3.4.1 (rating process incl. instructions documented in written form and audio/video recording); 6.3.5.2 (rating process documented for addressing an appeal procedure or for auditing a rater/a rater team); i.e. taking notes during/after live interview for the sake of transparent assessment
3.3.4	Documentation after testing	i.e. final rating and individual ratings
3.3.5	Appeal procedures	6.3.4.2 (at least two raters participate in the rating of tests, with a third expert rater consulted in case of divergent scores); 6.3.5.7 (documented appeal process); i.e. internal appeal process (apart from making an appeal to the CAA/State authority) ATCO.B.040 & EU 1178/2011 AMC1 FCL.055 (i)
3.4	Evidence for validity and reliability of the assessment	6.3.2.3 (description and rationale for test construct/ in layperson language); 6.3.3.1 (statement of evidence for test validity and reliability accessible to all decision-makers in plain, layperson language); 6.3.3.2 (description of development – incl. development calendar and all phases); 6.3.3.3 (expected washback effect on training/no memory testing); i.e. by feedback both of test-taker and raters/interlocutors (also 5.1.1, 5.1.2 & 5.8) & EU 1178/2011 AMC1 FCL.055 (n) (4) (iv)
4	DOCUMENTATION PROCESS	
4.1	Documentation of interview, assessment and results	incl. audio-recording of the live interaction between test-taker and interlocutor during 2.4.2 (Testing procedures - speaking skills)
4.2	Documents issued for test-taker	e.g. LP certificate
4.3	Licence endorsement	in case of handmade revalidation/handwritten licence endorsement
4.4	Reporting to authority documents and information issued for licensing	6.3.6.4 (documented process of reporting scores/results);
4.5	Retention of documents & records	6.3.6.3 & EU 1178/2011 AMC1 FCL.055 (n) (4) (v) (D) (documented and adequate record-keeping process);
4.6	Retention period	6.3.6.2 & EU 1178/2011 AMC1 FCL.055 (n) (3) (evaluation sheets and supporting documentation filed for a predetermined period of time);
5	QUALITY ASSURANCE PROCESS	EU 1178/2011 AMC1 FCL.055 (n) (1) (ii) EU 1178/2011 AMC1 FCL.055 (n) (2) Quality assurance programme covering all processes (1 to 5)
5.1	Examiner (rater/assessor and/or interlocutor) training	covering all examination skills, i.e. addressing rating/assessing skills and how to conduct as an interlocutor EU 1178/2011 AMC1 FCL.055 (m)
5.1.1	Initial Training	6.3.4.3 (initial rater training documented/training records maintained and raters audited periodically and reports documented);
5.1.2	Recurrent training	6.3.4.3 (recurrent rater training documented/training records maintained and raters audited periodically and reports documented); results of rating exercises to be continuously documented (evidence for intra-/inter-rater reliability);

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5.2	Deployment of examiners	e.g. for impartial assessment/ unbiased testing examiners, who are/were language teachers of the test-taker, are not to be deployed; no rater or interlocutor is to be involved in more than [number] of language tests per day (in order to prevent fatigue); every examiner is familiarized with all processes/procedures of the LTB handbook and is familiar with regulations/rules (familiarization by senior language examiner or Head of LTB);
5.3	Supervision of examiners	6.3.4.3 (regular audits of raters; monitoring of raters' assessment; initial/recurrent rater training documented/training records maintained and raters audited periodically and reports documented); i.e. experienced rater/interlocutor (part of leading staff, mostly senior language examiner) attends a language test as an observer (during a certain period to be determined by the LTB) or listens to respective audio/video recordings; possible aims: to provide objective peer feedback; to diagnose and solve possible testing/assessing problems; to help raters/interlocutors develop their skills; to evaluate them for promotions or appointments)
5.4	Communication within the LTB	e.g. describing all means of communication; senior language examiner facilitating communication (especially in major LTBs);
5.5	Communication with licensing authorities	In case there are different licensing authorities with differing contact details/ application procedures at any LP test (by notifying the CAA on coming tests)
5.6	Communication with overseeing authority	e.g. via Head of LTB; an LTB should declare its readiness to enable the overseeing CAA/State authority being present
5.7	Deployment of test material	e.g. details on test material available; no deployment of test versions, if there is evidence of their disclosure
5.8	Development and improvement of test material (gaining validity evidence)	6.3.3.2 (development calendar/phases); 6.3.7.5 (ongoing test development/maintenance of an item database); driven by feedback (chp. 3.4); sufficient test versions and customized according pilot's job role (e.g. plane/helicopter/ airship or professional/private [remote] pilot)
5.9	Safe-keeping of test material	6.3.5.8 (test security: protect test-item databases and provide secure storage of test materials)
5.10	Selecting further testing locations (apart from 1.4) incl. criteria for apt locations	6.3.5.4 (description of testing room where a test will be conducted, furniture and equipment) incl. general description of available locations and their preparation before testing (equipment, seating arrangements, etc.) 6.3.5.5 (Testing location with moderate comfort, privacy and quiet)
5.11	Transparency of assessment	6.3.4.1 (rating process documented with audio/video recording); 6.3.6.1 (speaking test involving interaction between test-taker and interlocutor is audio- or video-recorded); incl. repeatability and traceability
5.12	Documentation control	incl. checking for using correct official forms and its completion; improving interior forms of LTB; making sure that current forms are used may be also part of document/quality management
5.13	Data protection	6.3.5.8 (test security: provide secure storage of test scores/results); 6.3.6.4 (clear process of reporting scores/results); 6.3.6.5 (confidentiality policy on test results);
5.14	Remedy procedures in case of findings of the CAA/State authority	
5.15	Customer satisfaction	e.g. the test-taker is asked for feedback (for further improvements)
Appendices		e.g. compliance lists/ references to regulations/ national implementing rules; proof of qualifications; test material; proof of quality criteria (ongoing collection of documents proving validity/reliability); ICAO Rating Scale; etc.

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5.0 Interlocutors/ Raters/ Assessors Minimum Requirements

5.1 Minimum Requirements for Interlocutors

An individual who has the role of an interlocutor shall:

- have successfully completed initial interlocutor training
- successfully complete recurrent interlocutor training once every 12 calendar months
- have appropriate aviation operational or language testing expertise, or both

If the test is designed to assess ICAO Level 6 proficiency, interlocutors must demonstrate language proficiency at Expert Level 6.

When the test is designed to assess ICAO Level 5 proficiency, interlocutors must at least demonstrate language proficiency at Extended Level 5.

5.2 Minimum Requirements for Raters/Assessors

An individual who has the role of a rater/assessor shall:

- hold or have attained a Level 6 on the ICAO Language Proficiency Rating Scale or equivalent*
- qualify as an aviation specialist or language specialist (as defined in this notice)
- have successfully completed initial rater/assessor training
- successfully complete recurrent rater/assessor training once every 12 calendar months

**a CEFR C1/IELTS 6.5 level or higher*

A rater/assessor is sufficiently qualified to take the role of an interlocutor.

Additionally, raters/assessors shall be authorised by the Director General for Civil Aviation.

Note: In accordance with ATCO.B.040, an ATCO test taker must be assessed by a suitable qualified ATC assessor or a specifically approved assessor by TM-CAD.

5.3 Minimum Requirements for Language Test Development Team

All members of the language test development team shall be familiar with the following publications:

- ICAO SARPS and recommended practices of Annex 1
- ICAO Holistic descriptors (Appendix 1 to Annex 1) and ICAO Rating Scale (Attachment A to Annex 1)
- Manual on the Implementation of ICAO Language Proficiency Requirements (Doc 9835)
- ICAO Rated Speech Samples
- EU Regulation 1178/2011 Part-FCL requirements on Language Proficiency
- EU Regulation 2015/340 Part-ATCO requirements for student air traffic controllers and air traffic controllers on Language Proficiency
- Applicable PEL Notices as published on the TM-CAD website
- Language Testing Criteria for Global Harmonization (ICAO Cir 318 AN/180).

Additionally, members of the language test development team shall satisfy one or more of the

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conditions below:

- experience in aeronautical operations as a professional pilot (ATPL/CPL) or air traffic controller
- specialisation or work experience in training and assessment development
- hold a university degree and certification in TESL (or equivalent)

6.0 Training Requirements

6.1 Interlocutors, Raters or Assessors

Initial training for interlocutors/raters/assessors shall consist of at least 40 hours of training.

Initial training requirements for raters/assessors shall include:

- ICAO Regulation Requirements
- EASA Regulation including language requirements in Part-FCL & Part-ATCO (as applicable)
- TM-CAD Requirements and PEL Notices (as applicable)
- Aviation Safety & Communication
- ICAO Language Proficiency Holistic Descriptors & Rating Scales
- Test Structure, Design and Rationale
- Test Administration Procedures
- Aviation Terminology and R/T Phraseology (if required)
- How to conduct objective assessments
- Rating test-takers using ICAO Rating Scale & Holistic Descriptors
- Report Writing
- Practical and on-the-job training

Recurrent training for interlocutors/raters/assessors shall consist of at least 24 hours of training.

Recurrent training requirements for raters/assessors shall include:

- New developments on Language Proficiency requirements
- Operational aspects related to language proficiency
- Updates on accident/incident reports related to communication errors (if required)
- Updates in aviation terminology and R/T phraseology (if required)
- Test Developments/ Feedback/ Test Washback
- Standardisation and practical training

Both initial and recurrent training programmes for interlocutors/raters/assessors shall be documented in the language testing body operations manual and approved by TM-CAD.

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7.0 Test Criteria

Tests shall be regularly reviewed and updated; hence the LTB is required to adopt a procedure on how and when this will be conducted. The specifications and design of tests shall be explained in the LTB’s manual/ procedures. The below may assist in meeting all requirements for test design.

TEST SYSTEM
Test instruments need to include appropriate tasks that directly assess how test-takers use language in radiotelephony communication contexts.
<p>NOTE:</p> <p>Why is this important? The ICAO LPRs refer to communication between pilots and air traffic controllers. Assessing proficiency for radiotelephony communication is central to the ICAO LPRs. This is the primary focus of the safety-critical communication contexts which the ICAO LPRs aim to address.</p> <p>What does this mean for test design? Speaking and listening skills in air-ground communication contexts need to be directly assessed through dedicated test tasks that reflect this content, context and type of communication. A substantial component of the test needs to contain content and task types which assess how test-takers communicate in radiotelephony communication contexts – in listening (understanding what pilots or controllers are saying over the radio) and speaking (being able to communicate as pilots or air traffic controllers over the radio) components of the test.</p> <p>The tasks used to assess language proficiency for radiotelephony communication need to be appropriate and reflect the communicative contexts in which pilots or controllers communicate in real-world situations.</p>
Separate test instruments need to be designed for pilots and air traffic controllers.
<p>NOTE:</p> <p>Why is this important? The communication contexts and language needs of pilots and air traffic controllers differ and therefore these need to be reflected in different forms of the test, catering to the needs of each profession.</p> <p>What does this mean for test design? The structure of test instruments for pilots/air traffic controllers may look similar, however, the content and task requirements need to differ and reflect the language needs and communicative contexts associated with each profession.</p>
Test instruments need to contain tasks dedicated to assessing listening comprehension, separate from tasks designed to assess speaking performance.
<p>NOTE:</p> <p>Why is this important? Listening comprehension represents at least half the communicative load in aeronautical communication. Proficiency in comprehension is determined by a range of different cognitive skills, language skills and knowledge. All of these attributes are internal and cannot be directly observed for assessment purposes. In contrast, speaking skills are more observable and can be assessed directly by observing speaking performance. Therefore, proficiency in listening comprehension is best assessed in contexts which are not affected by speaking ability because basing decisions on what test-takers say may be more of a result of their speaking skills rather than their internal comprehension proficiency.</p> <p>What does this mean for test design? Tests need to contain sections and parts which are designed to only assess listening comprehension. This means test-takers are required to listen to prescribed recordings and then complete follow up comprehension tasks. Such tasks could be on paper, require test-takers to summarise information or answer prescribed written questions asked orally or provided on a test paper/computer screen.</p> <p>It is possible for tests to also evaluate comprehension subjectively in an interactive context in addition to having a dedicated listening test section, but not to the exclusion of including dedicated listening comprehension test sections. In such situations the subjective ratings should be used to support the results of the dedicated listening sections.</p>
Test instruments need to comprise distinct sections with a range of appropriate test task types.

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NOTE:

Why is this important?

Tests need to comprise different sections with different assessment purposes – assessing different skills/levels in a range of communication contexts. Tests which contain a range of different test tasks provide more opportunities to effectively sample the range, complexity and type of communication pilots or air traffic controllers may face. This improves both the fairness and the effectiveness of the test, including the validity of the interpretations made of test results and how these are used. Tests which do not include enough variety are not able to effectively sample test-takers’ abilities to engage with the language or communicate in different situations. This undermines the test’s overall validity. Such tests can also unfairly disadvantage test-takers who are less familiar or comfortable with certain test tasks which may dominate a test.

What does this mean for test design?

A variety of different task types, items, situations and content needs to be included throughout the test instrument to ensure the domain and range of language proficiency levels are effectively sampled.

Test instruments need to include test tasks that allow test-takers to engage in interactive and extended communication.

NOTE:

Why is this important?

Aeronautical radio communication involves pilots and controllers communicating in interactive situations – responding to issues, enquiring, solving problems, providing advice etc. In all such communication, each participant is required to engage in topics, negotiate meaning and participate in a collective and shared communicative context which develops as a result of the interaction.

What does this mean for test design?

At least some speaking tasks need to provide opportunities for test-takers to participate in interactive communication with a trained interlocutor, i.e., tasks which require the test-taker to contribute to a coconstructed dialogue in the same way that communication occurs in real-world aeronautical contexts. Test tasks which are limited to test-takers responding to isolated questions or disconnected prompts do not allow interactive skills to be evaluated and do not reflect real-world communications. They are therefore not authentic. Authenticity is a key requirement of proficiency testing. Note that in interactive speaking tasks, comprehension should not be assessed, or only be limited to supporting the results of a part of the test dedicated to assessing comprehension separately. Comprehension could be rated and included as a subjective impression to confirm or support the results of a dedicated listening part of the test.

Test instruments need to include tasks and items which allow the assessment to differentiate between ICAO language proficiency levels.

NOTE:

Why is this important?

Content and task types which target the proficiency levels and skills associated with each of the ICAO levels the test aims to assess need to be incorporated into the test.

What does this mean for test design?

Parts and components of tests need to be accessible and achievable for test-takers at different levels, with some parts/tasks/items catering to test-takers with lower proficiency levels (below ICAO Level 4), and other parts for ICAO Level 4 (and above). If the test claims to be able to assess ICAO Level 5 or Level 6, different tasks/items or test parts need to be dedicated to assessing these higher levels and their associated competencies (as reflected in the ICAO LPR rating scale).

Test instruments need to contain appropriate tasks that assess test-takers’ abilities to understand and communicate in real-world contexts.

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NOTE:

Why is this important?

In order for the test to allow valid assessment decisions to be made about how well test-takers are able to communicate in their jobs as either pilots or air traffic controllers, the test needs to ensure the content and task requirements allow for this evaluation to be effective. The closer the test reflects the communicative requirements associated with real-world communication contexts which pilots or air traffic controllers face, the more meaningful the test results are. Test tasks which require test-takers to communicate or use language that is not directly associated with how they communicate in real-world situations are not able to allow meaningful assessment decisions to be made about how well the test-takers can communicate in their jobs as pilots or air traffic controllers.

In high-stakes testing, test-takers respect tests and the results of such tests when the tests mirror real-world communication needs of the test-takers.

What does this mean for test design?

Components of the test need to contain tasks and content that mirror the kind of communication settings and contexts associated with real-world situations that pilots and air traffic controllers may face, both in radiotelephony communication and other job-related communication contexts. The more directly the test tasks mirror real-world communication contexts, including the type of language and how this is used, the more effective a test instrument is in allowing valid interpretations to be made about test performances and test scores.

Test instruments need to have a sufficient number of equivalent versions, with each version of the test representing the test instrument in the same way.

NOTE:

Why is this important?

Tests which do not draw on a sufficient bank of test versions lack security. Test-takers in a target population can become familiar with test content and therefore prepare and rehearse answers and responses for the test. Obviously, in such cases, the test is not able to accurately assess test-takers' real overall proficiency as test-takers may appear to perform on the test at levels above their 'real' proficiency level. Test banks also need to comprise equivalent test versions. This means that test-takers receive similar results on whichever version of the test they take. If the test bank includes versions which are easier than other versions, the test and the results are not reliable and therefore the overall testing system is not effective.

What does this mean for test development?

Tests need to comprise a test bank where each version of the test has aspects which are unique to that version of the test. Test developers need to ensure that each version of the test is written to a set of specifications so that all test versions are parallel and more or less equivalent in their level of difficulty and the range of language and communicative contexts that they assess. The larger the test-taker population and the more often they need to be tested, the larger the test bank needs to be.

PEL Notice No. 94 Version 4

Reference: ICAO Doc9835, Part FCL and Part ATCO



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8.0 Records

8.1 Language Assessment Administration Records

LTBs shall maintain records of the details of the language assessment and the test taker. Language assessment administration records shall include at least the following details:

- Date of Assessment,
- Test Taker's Surname & Name,
- Identification Document Nr.,
- Assessment Score/Rating
- Interlocutors' Details (if applicable)
- Assessors' Details.

These records shall be kept up-to-date and periodically submitted to TM-CAD. As a minimum, LTBs shall communicate the above-mentioned records every month.

8.2 Changes to the organisation

All changes requiring prior approval must be submitted to the authority for approval. For other changes not-requiring prior approval, the LTB must have a procedure in the manual for these changes agreed on by TMCAD.

Refer to PEL Notice 85 for procedure on submission of documentation.

9.0 Conduct of Language Proficiency Assessments

9.1 General

When conducting assessments of test-takers, Language Testing Bodies (LTBs) shall utilise the dual expertise of both an aviation specialist and a language specialist.

In cases where a rater/assessor is qualified both as an aviation and language specialist. TM-CAD may consider, with prior approval an assessment method that is administered by one individual, as an acceptable means of conducting an assessment.

9.2 Online Testing

The operation of an online LP test can be considered comparable to that of an on-site, if

- the online test is being recorded at all times (this shall be video including sound),
- the positive identification of the test-taker is assured,
- adequate hardware and software as required by the LTB,
- location is noise free/ no external disturbances and no other person allowed in the room,
- online test versions are securely provided (consideration to cyber-attacks or viruses), and,
- test tasks, material and instruments are specifically developed or adapted for an online environment.

The training organisation should ensure that the tests are being conducted at the same level of as if in an actual classroom. Oral test or remote forms could be used, provided the system used is the same for all test-takers.

When comparing on-site testing with online testing it is important to consider procedures for administering a test, such as: location(s), identity check and invigilation, assessment discipline, confidentiality or security, and equality of test instruments, tasks and material, all of which are explained in ICAO Doc 9835. The overriding principle here is to attain and protect the integrity of the

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testing process (cf. ICAO Doc 9835, para. 6.3.5.8). Therefore, an LTO wishing to also (or only) provide online-testing must document all of its procedures, including where necessary, additional security measures and adapted material and tasks, so it can be appropriately compared to its own or other on-site testing. With regard to the prerequisites laid down above in, this means:

For TMCAD's approval to this test, the below shall be conducted:

- An update of the manual including the procedure for effective tests, interrupted test procedure, suspicious behavior, verification of identity, no cheating is ensured not to occur, security of elements of tests submitted to the test-taker, validity of the secure test room link;
- A risk assessment on this procedure, how prompt material is made available;
- Demonstration of a "dummy" mock test to an inspector assigned by TMCAD,
- Access to TMCAD shall always be made available even during actual tests.

9.3 Appeal

Refer to PEL Notice 57.

10.0 Revocation, Suspension or Variation/ Limitation of an Approval

In case of any significant non-compliance to the regulations or with the terms of approval which reduces safety or seriously hazards flight safety, TM-CAD will raise a Level 1 finding and thus TM-CAD will prohibit, limit or suspend activities of the organisation. When the non-compliance "could" reduce safety or hazard flight safety as indicated in, the competent authority will raise a Level 2 finding.

Non-compliances

Any Findings shall be issued and addressed through Centrik. Access codes shall be provided upon approval of the LTB to the compliance manager.

11.0 Continued Validity of Approval

LTB approvals are non-expiring; however this is subject to a continuation recommendation every 12 or 24 months from the date of issue. This is raised by the TM-CAD Inspector following the audit programme.

Once an LTB has been issued with an approval it is subject to continued oversight of the management system, documentation, training and other areas required by TM-CAD.

11.1 Oversight Planning Cycle

The frequency of the audit is based on a risk-based concept. Nevertheless, the first oversight inspection will be conducted after 12 months of the issue date of the LTB.

11.2 Desk-top audits, Ad-hoc/ unannounced inspections

TM-CAD may, at any point, conduct unannounced or adhoc inspections as required by the oversight programme.

In accordance with national laws, Regulation (EU) No. 2018/1139 and its relevant implementing rules, organisations shall provide full access to any documentation, records, equipment, aircraft and facilities which the Director may wish to inspect or examine.

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In this regard the interpretation of providing access to documentation for the purpose of examining or inspecting data, may mean one or more of the below:

- Onsite physical access to documents, records, data, a system, facility, etc.
- Direct access to a database or system through password access (NB: only viewing rights are required) for retrieval of data, documents, records, etc.
- Submission to TM-CAD, electronic or physical copies of the data, documents or records for an analysis to be conducted offsite.

The means of access to the above shall be agreed upon by TM-CAD with the organisation. If access cannot be given a non-compliance shall be issued.

12.0 Guidance Material

- Malta ANO
- PEL Notice 56
- PEL Notice 72
- PEL Notice 85
- EU Regulation 1178/2011 – Part FCL
- EU Regulation 2015/340 – Part ATCO
- ICAO Doc 9835 - Manual on the Implementation of ICAO Language Proficiency Requirements
- Language Testing Criteria for Global Harmonization (ICAO Cir 318 AN/180)
- <https://www.alte.org/Materials>
Manual for Language Test Development and Examining
Guidelines for the Development of Language for Specific Purposes Tests.