CEFR และการจัดมาตรฐานการสอนภาษาอังกฤษ มหาวิทยาลัยราชภัฏสุราษฎร์ธานี

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Abstract

This research article explores the ways in which the Common European Framework of Reference for Languages (CEFR) has been used at Suratthani Rajabhat University since it was first introduced in 2012. Using a mainly quantitative questionnaire, consisting of a section that sampled staff beliefs and opinions regarding CEFR and a section consisting of a general knowledge test designed to assess the staff's understanding of CEFR levels and benchmarks, the study found that the staff command a limited understanding of CEFR and what it purports to do, and do in fact harbour some serious misconceptions about it. The article concludes by offering

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some suggestions to ameliorate such a shortcoming as a necessary step in improving the university's English curriculum design capabilities.

Keywords: CEFR, English Language Teaching, Suratthani Rajabhat University

บทคัดย่อ

บทความวิจัยนี้ศึกษาวิธีการใช้กรอบมาตรฐานความสามารถทางภาษาอังกฤษ ของประเทศในกลุ่มสหภาพยุโรป (CEFR) ซึ่งมหาวิทยาลัยราชภัฏสุราษฎร์ธานีได้ใช้มา ตั้งแต่ปี 2012 เครื่องมือที่ใช้ในการเก็บข้อมูลคือแบบสอบถาม ซึ่งประกอบด้วยส่วนที่เป็น ความเชื่อและความคิดเห็นเกี่ยวกับ CEFR และส่วนที่เป็นการทดสอบความรู้ทั่วไปเกี่ยวกับ ระดับต่าง ๆ และเกณฑ์มาตรฐานของ CEFR ผลการศึกษาพบว่าอาจารย์และเจ้าหน้าที่มี ความรู้ความเข้าใจต่อ CEFR และวัตถุประสงค์ของ CEFR อย่างจำกัด อีกทั้งยังมี ความเข้าใจผิดอย่างมากในบางประเด็น บทความนี้สรุปโดยการให้ข้อเสนอแนะเพื่อการปรับปรุง การออกแบบหลักสูตรภาษาอังกฤษของมหาวิทยาลัยให้มีประสิทธิภาพดียิ่งขึ้น

คำสำคัญ : กรอบมาตรฐานความสามารถทางภาษาอังกฤษของประเทศในกลุ่มสหภาพยุโรป การสอนภาษาอังกฤษ มหาวิทยาลัยราชภัฎสุราษฎร์ธานี

Introduction

Relative to other countries, Thailand's has a fairly short history in terms of standardization in the language teaching profession. It was not until 2012, for example, that Suratthani Rajabhat University (SRU) became one of the first public Thai universities to informally adopt the use of the Common European Framework of Reference (CEF or CEFR) system of benchmarks for tracking student progress in English language learning. While the popularity of high-stakes commercial exams like TOEIC, IELTS and TOEFL have long demonstrated a growing demand for internationally recognized standards in English language teaching within Thailand, it was not until 2014

that the Thai Ministry of Education finally announced the adoption of CEFR based proficiency targets for Thai students nationwide. While few would fault the country's move towards adopting internationally recognized standards, it is important to realize that the implementation of a standard's based curriculum is not only fraught with daunting challenges but is not, in and of itself, a panacea for many of the problems facing the country's language teaching profession, and may indeed if not properly implemented, exacerbate some problems.

Obviously, the adoption and implementation of any new and far-reaching policy initiative requires understanding and competency among the practitioners who will implement the policy. A necessary starting point for insuring such competency is to provide staff training in the form of workshops, seminars, short-term courses and self-access or distance learning opportunities. If such opportunities are not made readily available, then initiators have to rely on the vagaries of personal motivation and the natural curiosity of their respective stakeholders, arguably a far less reliable means for achieving competency among members of a targeted population. Indeed, this is what happened at SRU. Stemming from a 2012 British Council sponsored audit of the university's various English programs (Wilson, 2012), the university adopted several of the final report's recommendations, the most notable being the implementation of a standard's based curriculum using CEFR benchmarks and the twinning of year levels to four of the CEFR proficiency levels among English and Business English majors within two of the university's faculties, as outlined in Table 1.0.

Table 1.0: Required level at the end of each	academic year at SRU
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Eng. & Bus. Eng Majors Year Level	CEFR Level
1st Year	A1 (Basic)
2nd Year	A2 (Elementary)
3rd Year	B1 (Pre-intermediate)
4th Year	B2 (Intermediate)

Since then, the university has implemented a number of curricular changes to support the twinning of year levels to the CEFR scale; namely:

(2012 - present) An increased regimen of standardized testing at the first, second and third year levels, using both on-line and paper-and-pencil based Oxford and Cambridge assessment and placement tests:

(2012 - present) The introduction of a compulsory 60-hour non-credit remedial summer course for students who are not functioning at their required proficiency level;

(2012 - present) The establishment of a compulsory enrichment studies program for first, second and third year Humanities English majors, completely operationalized according to CEFR benchmarks.

(2015) Revisions to the Faculty of Humanities English curriculum to synchronize a number of core courses to year and proficiency levels.

(2015) A more concerted yet still largely informal effort to select course textbooks according to year and proficiency level targets.

(2015) The introduction of a B2 exit level of proficiency for fourth year graduates, starting with the 2017/2018 intake of Humanities' English majors.

Despite these changes, there has been little in the way of training for English language instructors at SRU, beyond the release of a few instructional documents designed to familiarize teachers with the CEFR system. This apparent oversight lies at the crux of this study: how knowledgeable are English instructors at SRU in terms of the CEFR, and what feelings do they harbour towards the implementation of a standard's based curriculum? The answers to these questions are framed within the context of 'over twenty years' (COE, 2018) of well-documented research concerning standardization in the field of TEFL. Like many policy initiatives, standardization, despite its numerous advantages, does present a number of challenges that need to be addressed if the benefits are to outweigh the disadvantages. The purpose of this study, therefore, is to chart a course from where our instructors are situated today experientially and where they need to be in the future.

The CEFR and What it Purports to Do

CEFR is actually one of several systems that have been developed over the years for determining language proficiency across the developmental spectrum from beginner through to advanced. Others include standards based proficiency guidelines developed by the Association of Language Testers in Europe (ALTE), the American Council on the Teaching of Foreign Languages (ACTFL), the U.S. Defense Language Proficiency Institute Foreign Language Center (DLIFLC) and the Centre for Canadian Language Benchmarks (CLB). While the guidelines developed by each association or centre divide the continuum of language proficiency somewhat differently, all provide detailed benchmarks at each level of proficiency in each of the four skills, and these are often presented as "can do" statements; that is, what the learner can functionally accomplish when listening, reading, writing and speaking. Using the CLB as an example, learners at level 4 can write correctly punctuated simple sentences and short paragraphs on familiar topics to people they know, complete simple forms with 15 to 20 items and produce short, simple messages to get things done.

Herein lies the ultimate potential value of such benchmarks. By placing learners in programs and courses, based on clearly elucidated and delineated competency skill sets, learners are assured of receiving instruction and meaningful practice opportunities that are precisely matched according to their current levels of proficiency. Comprehensible input, in turn, avoids student frustration and encourages success through the correct alignment of instructional sequences that are neither too difficult nor too easy. Moreover, programs based on such benchmarks permit learners to chart a course from where they are now to where they want or need to be in the future.

Another common feature shared by different guidelines is that none of them are prescriptive in terms of curriculum, course design or teaching methodology. Implementers of a chosen system are free to choose what and how they teach. In other words, guidelines are intended to inform, not dictate, instruction. Given that effective levels based systems must be able to accurately assess student proficiency along the entire continuum of competence from entry level through to advanced, it is little wonder, therefore, that considerable effort has been extended towards the development of tests that are purported to measure student proficiency at each level. While numerous instructional programs, courses and resources have been developed to assist students in reaching their targeted levels, the vast majority of research and development in the field has been focused on assessment. It should be kept in mind, however, that the development of

levels based systems such as the CEFR 'coincided with fundamental changes in language teaching, with the move away from the grammar-translation method to the functional/notional approach and the communicative approach' (Cambridge ESOL, 2011), and such systems reflect those changes but do so within the context of being 'primarily a non-prescriptive tool for reflection' (COE, 2018).

Although all levels based systems share common features, what distinguishes CEFR from the others is undoubtedly its success. While 'originally designed as a comprehensive reference tool to promote educational transparency and to allow movement between countries for work or study within the European Union' (EnglishProfile, 2015), the CEFR, has since its publication in 2001, been translated into '37 languages and its use has spread outside Europe, from Asia to Latin America' (ibid). A variety of factors contribute to the globalization of the CEFR but chief among them is the endorsement rendered by major testing services such as Cambridge ESOL Examinations and TEFL related publishing houses like Cambridge University Press and Oxford University Press. Such organizations have helped to make CEFR a recognizable brand around the world by establishing equivalencies between the CEFR benchmarks and their range of products.

Thailand's relatively recent adoption of CEFR throughout its schools nationwide was announced amid much fanfare and was widely reported in the press between 2014 and 2015. As reported at the time in the Asian Correspondent:

...there is general consensus among educators that the adoption of the CEFR is a vital step towards clarifying language goals and raising English language standards. Prior to this, the Thai MoE foreign language curriculum has been ambiguous and often interpreted differently from school to school. This ambiguity had hindered efforts to raise English language standards across the country.

Soon after, the Ministry of Education (MoE) held a one-day training session for representatives from various schools around the country and initiated nationwide testing of government school Thai English teachers using the Oxford Placement Test as part of its initial efforts to implement CEFR-based standardization. Since then, the MoE has created its own version of the CEFR, referred to as the Common European Framework of Reference for Languages-Thailand or FRELE-TH, which purports 'to be more comprehensible and relevant to Thai learners and users of English' (Foley, 2019).

While the MoE has arguably implemented CEFR-based standardization with the best of intentions, it has rolled out this policy initiative in a 'top down' manner that has left many of its stakeholders, teachers and students, confused and disgruntled (Franz & Teo, 2018). Many have come to view CEFR not as non-prescriptive tool designed to aid curriculum design and classroom instruction but rather as an assessment device and a high-stakes one at that where academic advancement and job security hinge on test results that can have a discernible impact on people's well-being. Such is the present context in which the SRU study occurs.

Research Design

This study relies primarily on a combined questionnaire and test that was administered to 18 Thai English teachers and support staff who are all involved with CEFR based curriculum during the normal course of their work. Administered on three separate occasions during the first semester of the 2019/2020 academic year, respondents included English teachers from

both the Faculty of Humanities and the Faculty of Education, as well as support staff from the university's Language Institute. During the normal course of their work, Thai English teachers are involved with designing curriculum, writing or selecting appropriate resources, most often commercial textbooks, and delivering language content in their weekly courses. The support staff at the Language Institute, on the other hand, are involved with fulfilling the university's obligations as a TOEIC examination centre, assisting with the design and implementation of a university wide CEFR based exit exam for graduating fourth year students, and designing, organizing and administering a university wide foundation course for entering first year students.

The research instrument itself canvassed respondents on their background, opinions and knowledge of CEFR. The first part required respondents to reflect on their level of expertise , the sources of their knowledge, their level of interest, their opinions concerning the value of a CEFR based curriculum, and what they would do according to several frequently encountered scenarios involving course design and teaching, using a combination of Likert scale, multiple choice and open-ended questions The second part required respondents to complete a general knowledge test as related to information germane to CEFR. This part was divided into two sections, the first requiring respondents to identify the appropriate level learners can be expected to reach designated milestones in each of the four skills, listening, speaking, reading and writing, and the second requiring respondents to identify the appropriate level from sample sections of commercial EFL textbooks. To avoid consulting with outside sources during the test, all but two of the respondents completed the questionnaires under supervision without the aid of electronic devices. (See Appendix)

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Results from the questionnaires and tests were tabulated, and then analyzed both according to the respondents' respective faculty and program and together as an overall group, reflecting the general state of opinions and knowledge of Thai English language teachers at SRU as a whole.

Results

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1) Attitudes & Opinions RE: CEFR

Table 2.0 presents the results of the questionnaire part of the survey. As can be seen, the majority of respondents consider themselves to be competent in terms of their knowledge and cite on-line research, self-study and interaction with colleagues as the sources for information regarding CEFR. Most assign a high degree of importance to commanding an adequate understanding of CEFR as it relates to teaching English in Thailand, and most expressed an interest to learn more. However, when asked to consider the degree to which CEFR informs the way they teach and how they approach the selection of course textbooks, more respondents chose 'somewhat' as opposed to 'very much'. In other words, a knowledge of CEFR appears to play a contributing role but is certainly not the driving force when it comes to teaching methods or selecting appropriate textbooks for students.

CEFR & English Language Teaching Standardization

at Suratthani Rajabhat University

	Expert	Competent	Novice	No Response	
Knowledge Level – Self-rated	11.1	66.7	11.1	11.1	
	Colleagues	Books	Workshops	Self-study	On-line
Source of Knowledge	44.4	16.7	22.2	44.4	72.2
	Very Important	Somewhat	Not So Important	Not Important	
Degree of Importance	66.7	27.7	5.6	0	
	Very Much	Somewhat	Not So Much	Not at All	
Informs Teaching Methods	38.9	44.4	11.1	5.6	
	Very Much	Somewhat	Not So Much	Not at All	No Response
Determines Selection of Books	38.9	50		5.6	5.6
	Very Much So	Yes	Not So Much	Not at All	
Interest in Learning More	44.4	50	5.6	0	

Table 2.0 : SRU Staff Background & Opinions RE: CEFR

The second part of the opinions' section also sheds considerable light on the staff's understanding and beliefs concerning CEFR. In this part of the questionnaire respondents were presented with two 'what if' scenarios, based on commonly encountered situations that frequently require staff to make decisions regarding course design and textbook selection. The first question asked staff to choose an appropriate textbook for A1 level students and the second question asked staff to decide what they would do when an appropriate book is not available for lower level student, who are tasked with studying an English for Specific Purposes (ESP) course. In response to the first question, a surprising minority of staff (22.2%) said they would either choose an A2 level text (33.3%), based on the belief that students

need a goal to aim towards, or else they would base their decision on what the curriculum specifies (44.4%), regardless of the students' determined level. In response to the second question, responses included using the internet as the primary source of content (47.4%), selecting related sections from an appropriate level general textbook (31.6%) and using a B1 level text, which would require the teacher explaining difficult sections in Thai (21.1%).

2) CEFR General Knowledge Test

Despite the fact that quite a few on staff believe they command a reasonable knowledge of CEFR related information, the test results do not bear this out. Table 3.0 presents the degree of accuracy demonstrated on both the Can Do statements level identification task for each of the four skills and the sample textbook passages identification task across each respective program and for the university's cadre of Thai English teaching professionals as a whole.

Table 3.0: CEFR Knowledge Test Results at SRU	(%)
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Part 1 – Can Do Statement Identification			Part 2 -	Combined	
Listening	Reading	Speaking	Writing	Textbooks	Average
46.7	53.0	56.3	42.4	54.8	51.7

While the three language institute staff and the five Education English teachers canvassed performed substantially better than the ten Humanities English teachers in all parts of the test, none of the results, with the possible exception of the Language Institute staff as related to the speaking Can Do statements, demonstrate a competent understanding of CEFR levels. This was found to be particularly true for the Can Do section of

the test. While accuracy was more pronounced in terms of identifying learner abilities at the two endpoints of the scale, A1 and C2, staff were hard-pressed to correctly identify learner abilities between the two extremes. There were, in fact, numerous instances of B2 and C1 levels of proficiency being assigned to A2, and vice versa.

While staff performance as related to the sample textbook levels identification task was marginally better for two of the groups, the results still do not inspire much confidence in the staff's ability to assess textbooks vis a vis learners' varying levels of competency. Again, accuracy was more pronounced at the lower end of the range, this time within the A1 and A2 levels, but became increasingly less accurate across the higher levels with the exception of Education English teachers who demonstrated a reasonable degree of accuracy all the way from A1 to C1. There were, nonetheless, numerous instances of staff across all programs under-estimating the difficulty of sample passages, assigning, for example, B1 and B2 level passages to an A2 level of proficiency.

When the results of the test's two subsections were combined for an overall composite score, the English teachers in particular demonstrated a limited understanding of CEFR levels both in terms of what learners can be expected to do at each point along the range of levels and in terms of accurately assessing a text's level of difficulty. As noted before, teachers tended to be more accurate with assessing both students and teaching resources at the lower end of the CEFR range. This makes sense in light of the fact that many English majors at SRU tend to plateau at an A2 level of proficiency so most teachers at SRU have limited experience working with students at higher levels with some exceptions worth noting among the Language Institute Staff. The tendency of many teachers to over-rate their competency does conform to the Dunning-Kruger effect as witnessed in other skill areas: people tend to overestimate their level of expertise, particularly when they are novices. While such a phenomenon is understandable in light of psychology, it does have serious ramifications in terms of language teaching at SRU.

Discussion

Evidence from both parts of the survey supports the contention that SRU staff command a limited understanding of CEFR and a number on staff actually harbour misconceptions regarding its value and potential use. Particularly alarming is the belief among some that students determined to be at one level should be paired with instructional resources at the next higher level. While Krashen's notion of comprehensible input has been criticized on numerous grounds (Liu, 2015), few would argue with its basic premise in terms of how fundamentally important it is for learners to understand what is being taught in the target language. Certainly, translation and quick explanations in Thai do have their place in language teaching but if content is well beyond student understanding, teachers soon find themselves on a 'very slippery slope' where the target language ends up being talked about rather than used and practised in meaningful ways. Anecdotal observations conducted on numerous occasions do indeed confirm that many teachers at SRU conduct many of their lessons in their native language and use translation as a primary instructional strategy.

The problems arising from mismatching students with resources may stem to a large extent from the English curriculum used at SRU. With the exception of a small number of core skill based courses in listening and speaking and reading, the majority of courses offered are 'one off' ESP

courses, which do not make use of, or even acknowledge, the sequencing potential offered by CEFR. This is further compounded by the fact that many commercially published ESP course books are rated at B1 - C1. A teacher tasked with teaching English for Tourism, for example, may be faced with three stark choices: use a textbook that is well beyond the students' level of proficiency, compile their own resources using a variety of books and the internet or write their own textbook. Again, anecdotal observations confirm that most teachers choose the first two options. Given that most teachers at SRU have demonstrated a limited understanding of the developmental levels subsumed within the CEFR, it remains questionable whether they command the skills, or are aware of the tools available, needed to accurately compile resources that match their students' proficiency levels.

As Foley (2019a) found with research conducted on a much larger scale than here, teachers throughout the region see CEFR as simply 'a measure of language proficiency rather than a goal in terms of can do statements'. For both students and teachers here at SRU exposure to CEFR has been solely limited to testing and assessment so it is likely they concur with such a view. This may explain why the university has extended all of its efforts on designing its own exit level CEFR test for graduating fourth year students rather than attempting to incorporate it into the several curriculum revisions that have taken place over the last few years. Limiting CEFR to a 'gate keeping' role undermines its potential as a tool for integrating and unifying what has been and continues to be a disparate and disjointed curriculum comprised mostly of unrelated courses.

Conclusion

Given that numerous research articles have found serious shortcomings in how CEFR has been implemented throughout the region (Fennelly, 2016, Foley, 2019a & 2019b, Uri et al, 2018), it should come as no surprise that language teaching professionals at SRU have demonstrated a limited understanding of this imported reference guide. Without adequate training, staff have had to deal with changes wrought by its introduction on their own within a context marked by a lack of consultation, high-stakes exams and a plethora of commercially-prepared teaching resources, which, as several studies (Alderson, 2007; Poszytek, 2012; Moser, 2018) have found, are sometimes questionably rated using the CEFR benchmark labels. As Alderson (2007) observed:

> ... examination providers, textbook publishers, and curriculum developers make claims about the relationship between their products and the CEFR. There is no doubt that claims of links to the CEFR sell books, exams, and curricula, and provide teachers and teacher trainers with reassurance. The problem is that there is little empirical evidence to back up these claims

By way of example, in 2014, Humanities' English majors at SRU sat for three different placement tests developed by Oxford, Cambridge and the on-line self-access learning platform, SPEEXX. Less than 22% of the students tested were consistently rated across all three tests and numerous instances of two or more band discrepancies (e.g., A1, B1 & B2) were encountered. Not to labour the point but such ambiguity in results makes

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it easy to understand why teachers can and do misunderstand the rating system.

As the wave propelling CEFR's adoption in the region shows no sign of abating, either in its present form or as modified hybrids such as the MOE's FRELE-TH, language teaching staff at SRU are well-advised to improve their understanding of a resource that would be more beneficially viewed as a tool for aiding the curriculum design process than solely as an instrument for assessing student proficiency. As North (2008) points out the CEFR 'offers an opportunity to look at planning, teaching and assessment from different perspectives and see how they all link up." While it is certainly not a remedy for all problems facing English teachers at SRU, a well-informed understanding of CEFR does provide a solid grounding from which future revisions to the curriculum could be made.

References

- Alderson, J.C. (2007). The CEFR and the Need for More Research. *The Modern Language Journal, 91(4),* 659-663.
- Cambridge University Press (2015). *EnglishProfile The CEFR for English.* [Online] Retrieved from http://www.englishprofile.org/the-cefr. [2018, August 8].
- Council of Europe (2018). *Historical Overview of the Development of the CEFR.* [Online]. Retrieved from https://www.coe.int/en/web/common-european-framework-reference-languages/history. [2019, November 1].
- Fennelly, M.G. (2016). The Influence of CEFR on English Language Teaching in Japan. [Online]. Retrieved from https://www.shikoku-u.ac.jp/ education/docs/A46p109-122.pdf. [2018, October 6]

- Foley, J.A. (2019a). Issues on Assessment Using CEFR in the Region. LEARN Journal: Language Education and Acquisition Research Network Journal, 12(2), 28-48.
- Foley, J.A. (2019b). Adapting CEFR for Use in ASEAN, Japan and China. The New English Teacher, 13(2), 101-117.
- Franz.J, & Teo, A. (2018). 'A2 is normal'- Thai secondary school English teachers' Encounters with CEFR. *RELC Journal, 49(3),* 322-338.
- Liu, D. (2015). A Critical Review of Krashen's Input Hypothesis: Three Major Arguments. *Journal of Education and Human Development,* 4(4), 139-146
- Moser, Jason. (2018). From a knowledge-based language curriculum to a competency-based one: The CEFR in action in Asia. *Asian EFL Journal*, 113-135.
- Noom-ura, S. (2013). English-Teaching Problems in Thailand and Thai Teachers Professional Development Needs. English Language Teaching, 8(11), 139-147.
- North, B. (2008). *The relevance of the CEFR to teacher training.* Babylonian 2(2008). 55-57.
- Poszytek, P. (2012). Policy perspectives from Poland. In M. Byram & L. Parmenter (Eds.), The common European framework of reference: The globalization of language education policy. Bristol: Multilingual Matters, 97-103.
- Sornkam, B., Person, K.R., & Yordchim, S. (2018). *Reviewing the Common European Framework of Reference for Languages in Thailand Higher Education.* Graduate School Conference, 1(2), 1-7.

Urkun, Z. (n.d.). *Re-evaluating the CEFR: An Attempt. Sabanci Universiti School of Languages Webpage*. Retrieved from https:// sl.sabanciuniv.edu/sl-blogs/re-evaluating-cefr-attempt. [2019, January 15].

- Uri, N.F. & Aziz, M.S. (2018). Implementation of CEFR in Malaysia: Teacher's Awareness and the Challenges. *The Southeast Asian Journal of English Language Studies, 24(3),* 168–183.
- Wilson, J. (2012). English Language Major Programmes at Suratthani Rajabhat University, Thailand -- An External Evaluation and a Proposal for Reform: unpublished.

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