

Code of Conduct Languages

Preamble

Considering that:

- the University of Twente is an inclusive organization that values diversity, where students and staff are involved, able to develop their talents and strive for excellence as part of an international community.
- the University of Twente aims
 - o to train its students to become citizens of an international community and to prepare them for a career in an international professional field, either in engineering and technology or in a related field of application. For that purpose the university incorporates an international and intercultural perspective into its teaching and tuition;
 - o to conduct excellent research in collaboration with partners from across the world and to attract international talent and funding to do so;
 - o to contribute to solutions for major societal challenges;
 - o be an inspiring, international learning environment that is a determining factor for the innovative capacity of the region.
- a large part of the University of Twente community (students and staff) has an international background.
- language is both a means and a barrier in creating an inclusive working and learning environment.
- the choice for the official language of education must be considered from the legal framework of the Higher Education and Research Act Section 1.3 (5) and Section 7.2.

on 1st of July 2019, the Executive Board of the University of Twente adopts the following Code of Conduct Languages that applies from 1 January 2020.

Article 1. Official language within the organization

- 1.1. The official language of the organization is the language used when providing and exchanging information internally.
- 1.2. The official language of the organization is English. In specific terms this means that:
 - a. in view of being an inclusive organization, the official language is one in which staff and students are able to participate (hereinafter: inclusivity principle).
 - b. formal communication by the University of Twente as an organization to students and staff is conducted in English at least.
 - c. formal communication used externally, such as the website, aimed at regional, national and international target groups and context must be in at least Dutch and English. Communication aimed at external parties is conducted in the language as agreed between these partners.
 - d. individual customer contact is conducted in the language as chosen by the persons involved with due observance of the inclusivity principle.
 - e. when documents are drafted in multiple languages, the legal status is included in the document.
- 1.3. The choice of language in informal settings is left to the persons involved, with due observance of the inclusivity principle.
- 1.4. Independent parties who are nevertheless closely linked to the University of Twente are strongly encouraged to align their language policy with that of the University of Twente.

Article 2. Official language for decision-making and advisory bodies

- 2.1. The official language for decision-making and advisory bodies is the language used in formal policy and other documents, formal decisions and advisory opinions, and the meetings held by the formal decision-making and advisory bodies in which these are discussed.
- 2.2. The official language for decision-making is English. In specific terms this means that:

- a. formal decision-making and advisory bodies as stated in the Executive and Management Regulations, not including the participation bodies, use English as their official language for formal written communication. Documents for the agenda are submitted in English. Possible exception to the two preceding sentences is when there is a compelling reason to use Dutch.
 - b. decisions made are documented and communicated in English.
 - c. verbal communication between the members during meetings of the bodies as referred to in Article 2.2 (a) is conducted in the language agreed by the members, with due regard to the inclusivity principle.
- 2.3. Participation bodies as specified in Higher Education and Research Act Section 9.38 (c) are free to determine the official language of their spoken and written communication. However, they are encouraged to align their policy with the language policy of the University of Twente and therefore communicate either in English or in English and Dutch and to observe the inclusivity principle at all times.

Article 3. Official language for education

- 3.1. The official language for education is the formal language in which education is given, in which teaching material is provided and in which tests and examinations are held at the University of Twente. This includes all Bachelor and Master's programmes at the University of Twente that are registered in the CROHO.
- 3.2. Section 7.2 of the Higher Education and Scientific Research Act stipulates the conditions to conduct an educational programme or part of a programme in a language other than Dutch. At the University of Twente this means that English may be chosen as the official language of the programme or part of the programme if:
 - a. the acquisition of intercultural and international skills, e.g. in an international classroom, are part of the learning outcomes of the programme, and/or
 - b. the educational programme prepares students for a career in an international environment for which they are required to master professional knowledge in English, and/or
 - c. the educational programme is closely linked to research in the relevant field of study and this research is conducted in an international context with international staff and specialist literature in English.
- 3.3. Each educational programme has a vision on Dutch language proficiency and, where applicable, English language proficiency related to the official language of the educational programme.
- 3.4. The authorization to establish the official language of an educational programme or part of an educational programme lies with the faculty board of the faculty to which the educational programme belongs. The programme committee has right of approval.
- 3.5. Educational information, the Education and Examination Regulations (hereinafter: EER) and the programme-specific rules and regulations of the Examination Board are available in at least the programme's official language.
- 3.6. Programme-specific communication with students should take place in the official language of the educational programme to which the communication relates.

Article 4. Language proficiency of students

- 4.1. Regarding the accessibility of higher education for Dutch students, there are no language proficiency requirements for Dutch students other than a pre-university education (VWO) diploma to start a Bachelor's programme, or a relevant Bachelor's degree from an accredited Dutch institute to start a Master's programme.
- 4.2. International students who enrol in a Dutch-language programme must meet the same entry requirement, i.e. the same level of Dutch language proficiency, as the exit level of pre-university education.

- 4.3. International students who enrol in an English-language programme must meet the same entry requirement of English language proficiency, which equals
 - a. for a Bachelor's programme an IELTS certificate with an overall band score of 6.0.
 - b. for a Master's programme an IELTS certificate with an overall band score of 6.5. This entry requirement also applies to the Pre-Master's programme because it is part of the admission to the Master's programme.
 - c. For a PhD position an IELTS certificate with an overall band score of 6.5.
 - d. For incoming exchange students an IELTS certificate with an overall band score of 6.0.
- 4.4. Compliance with the entry requirements as described in Article 4.2 and Article 4.3 may be demonstrated by submitting accredited certificates¹ in accordance with the Code of Conduct for International Students in Higher Education Articles 4.2 and 4.3.
- 4.5. The provisions of Articles 4.2 and 4.3 explicitly relate to the entry requirements for incoming students and involve only the formal aspects of language such as spelling and grammar: not academic language proficiency². Acquiring academic language proficiency should be part of the vision set out in Article 3.3.
- 4.6. During the Bachelor's phase, the University of Twente offers its students facilities to be able to comply with the entry level of proficiency in English that is required for an English Master's programme at the University of Twente.
- 4.7. Regarding the official language for education and the language proficiency of students, the EER specifies the following:
 - a. the language in which the programme is taught and, where applicable, the individual programme components;
 - b. entry requirements regarding Dutch and English language proficiency;
 - c. the way in which language proficiency is tested.
- 4.8. Where joint programmes are concerned, agreements are made with the partner university regarding the students' language proficiency. These requirements are at least equal to the requirements set out in article 4.3.
- 4.9. Evaluation and review of the entry requirements relating to Dutch or English language proficiency may be conducted on the advice of a formal decision-making or advisory body as referred to in the Executive and Management Regulations, not including participation bodies.

Article 5. Language proficiency of staff

- 5.1. The English and Dutch language proficiency of staff must be appropriate to the duties with which the staff have been tasked. Minimum requirements for English proficiency have been established for each job profile, varying between B1 and C1 according to the European Reference Framework.
- 5.2. In addition to the provisions of Article 5.1, lecturers working in an English-language programme must have at least C1 level proficiency to guarantee the quality of education in English.
- 5.3. The level of proficiency in English is demonstrated by a language proficiency test or accredited certificate³.
- 5.4. Staff may be exempt from assessment as established in Article 5.3 when the staff member's native language is English or if the staff member has demonstrable professional experience in an English work environment.
- 5.5. Besides the minimum language proficiency level as set out in Articles 5.1 and 5.2, all University of Twente staff have a development plan for language proficiency appropriate to their work.

¹These are IELTS, TOEFL, Cambridge CAE or Cambridge CPE certificates or exemption according to the diploma's referred to in Article 4.3 of the Code of Conduct for International Students.

²Academic language proficiency comprises the whole of language knowledge, skills, strategies and attitudes which students must develop to successfully carry out tasks in higher education and in their later profession.

³These are IELTS, TOEFL, Cambridge CAE or Cambridge CPE certificates.

- 5.6. Language proficiency or developing it is part of the recruitment and selection procedure of new staff. In any case, job vacancies must list the minimum language level required for the work.
- 5.7. The director of operations of the faculty or the director of the service department to which the staff member belongs is responsible for supervising compliance with the provisions of Articles 5.1 to 5.6.

Article 6. Support for language proficiency

- 6.1. The University of Twente supports its students in the following ways:
 - a. by facilitating Dutch-speaking students to maintain their Dutch language proficiency. Non-Dutch speaking students are actively invited and assisted to learn Dutch so that they can pursue opportunities on the national and regional job market.
 - b. by supporting the further development of their English proficiency.
 - c. by training academic language proficiency, which as a minimum is implicitly integrated in the programme and its learning objectives.
- 6.2. The University of Twente supports its staff in improving and maintaining their level of proficiency in Dutch and English. With a view to aiding integration in Dutch society, permanently employed international staff members are actively stimulated and assisted to learn Dutch.
- 6.3. The provisions of Articles 6.1 and 6.2 are facilitated by the University of Twente Language Centre.
- 6.4. Costs may apply to the facilities and services referred to in Article 6.3. The basic principle is accessibility of the offering, which means that the price will not exceed cost price.

Article 7. Official language of education

- 7.1. Evaluating the official language of education is part of the degree programme's accreditation or re-accreditation process.
- 7.2. When evaluating the official language of education, at least the following aspects must be addressed:
 - a. arguments for the choice of language as referred to in Article 3.2 and the vision on language referred to in Article 3.3.
 - b. how students' English, Dutch and academic language proficiency as described in Article 4 is approached in the programme.
 - c. the language proficiency of lecturers as described in Article 5.2.

Article 8. Change in official language for education

- 8.1. The decision-making authorization to change the official language of an educational programme or part of an educational programme lies with the faculty board of the faculty to which the educational programme belongs. The Programme Committee has right of approval.
- 8.2. A change to the official language of an educational programme may only take place at the start of a new academic year. That means that the decision on the official language of the educational programme must be made three semesters before the starting date.
- 8.3. If the official language of an educational programme is changed, the faculty board of the faculty to which the educational programme belongs will establish a transitional arrangement for the current students. The transitional arrangement will at least be published on the programme's website.
- 8.4. The transitional arrangement deals with the rights and obligations of the current students. A change to the official language is made per cohort. If current students have explicitly indicated that they have no objection to a change, other customized agreements may be included in the transitional arrangement.

Explanatory notes

This document comprises the explanatory notes to the Code of Conduct Languages as adopted on 1 July 2019.

Background

- In the internationalization vision and resulting University of Twente Language Policy (UTLP), the University of Twente commits to offering an inclusive international learning and working environment. Language is an important means to achieve that.
- In addition, internationalization and the language of tuition in higher education are topics of public debate. Here are some examples:
 - o “The government will make greater efforts to enforce the legal requirement that educational programmes may only be taught in English when this has added value, the quality is adequate and there are sufficient Dutch-language programmes.” Translated from the coalition agreement according to <https://www.scienceguide.nl/2017/10/wet-op-taalbeleid-echt-handhaven/>
 - o The Dutch House of Representatives adopted a motion on 24 April 2018 requesting the government to “present a periodic overview of the content and application of the codes of conduct (Codes of Conduct Languages - ed.) in accordance with the original purpose of the law.” The outcome of a first appraisal by the Inspectorate of Education states that the code of conduct at universities only briefly addresses the statutory requirements as established in Section 7.2 of the Higher Education and Research Act (Observation by the Inspectorate of Education in a letter dated 22/2: <https://www.onderwijsinspectie.nl/actueel/nieuws/2018/12/21/taalbeleid-in-hoger-onderwijs-beter-op-praktijk-laten-aansluiten>). The full report ‘Nederlands of Niet: gedragscodes en taalbeleid in het hoger onderwijs’ (Dutch: *do or don't? Codes of conduct and language policy in higher education*) is accessible via <https://www.onderwijsinspectie.nl/documenten/rapporten/2018/12/21/nederlands-of-niet-codes-of-conduct-en-taalbeleid-in-het-hoger-education>
 - o In her letter ‘Internationalization in balance’, the Minister of Education, Culture and Science looked in more detail at the language policy of higher educational institutes and the accessibility of education. This will become part of the new accreditation framework. She also announced an amendment to Section 7.2 of the Higher Education and Research Act that regulates the language of tuition of educational programmes.

Legal framework

The legislative framework for the Code of Conduct Languages is constituted by the following two sections from the Higher Education and Research Act (translated to English):

Section 1.3, subsection 5: The higher education institutes also devote attention to their students’ personal development and encourage social responsibility. Encouraging social responsibility means at the very least that the institutes, including those representing them formally or informally, refrain from discriminatory conduct or remarks. Within the context of their work in the field of education and where it concerns Dutch-language students, the institutes also focus on promoting communication skills in Dutch.

The Inspectorate of Education interprets the above section of the law as follows: “Where it concerns Dutch-language students, each institute is tasked with promoting communication skills in Dutch, regardless of the chosen official language of education and the arguments put forward in the Code of Conduct.” – translated quote from Inspectorate of Education report.

Section 7.2 Language: The language used for teaching and examinations is Dutch. In derogation from the first sentence, another language may be used in the following cases:

- a. *when it concerns an educational programme relating to that other language,*
- b. *when it concerns tuition given in the context of a guest lecture by a non-Dutch speaking lecturer, or*

- c. *if compelled by the specific nature, organization or quality of the education or as the case may be, the country of origin of the students, in accordance with a code of conduct adopted by the Executive Board.*

In her letter 'Internationalization in balance' to the House of Representatives, the Minister for Education, Culture and Science indicated she wished to modernize the above section of the law, because "it dates from 1991; a time when the internationalization of higher education was at an entirely different stage. As well as the Royal Netherlands Academy of Arts and Sciences (*KNAW*), the Education Council likewise recommends updating the wording of Section 7.2. By amending the section I would like to oblige institutes to carefully weigh the choice for a language other than Dutch at programme level, with added value for the quality and with consideration for the interests of Dutch students." The new Language and Accessibility Bill has been submitted for internet consultation (<https://www.intemetconsultatie.nl/toegankelijkheidho>).

Section 7.2 Language

1. *The language used for teaching and examinations is Dutch.*
2. *In derogation from the first subsection, another language may be used in an educational programme or part of a programme, if:*
 - a. *it concerns an educational programme or part of the programme relating to that language,*
 - b. *it concerns teaching by a non-Dutch speaking lecturer given in the context of a guest lecture, or*
 - c. *if, considering the specific nature, organization or quality of the teaching this - rather than using Dutch - is more in the interest of acquiring the knowledge, insight or skills that students must have acquired at the end of their programme.*
3. *In cases where the second paragraph applies, the Executive Board formulates policy in this regard, detailing:*
 - a. *the procedure and grounds for using another language in an educational programme, and*
 - b. *the way in which the institute makes an effort to guarantee the quality of education of the programme and the accessibility of the programme for Dutch-language students.*
4. *A general administrative order may stipulate to which topics referred to in paragraph 3 (b) the policy relates in any case.*

The Code of Conduct anticipates the new Language and Accessibility Bill, as this amendment is expected to be adopted before the Code of Conduct enters into force (date: 1-1-2020).

Explanatory notes to the Code of Conduct per article

Article 1: Official language within the organization

This article explains the language choice of the organization. As part of the internationalization vision, we strive to make our campus a place where University of Twente students and staff feel welcome and at home. Our guiding principle in this respect is and will remain inclusiveness while being mindful of diversity. Inclusion means truly involving, enclosing and including people in the group. Diversity covers all aspects in which people may differ from each other, such as gender, age, religion, sexual preference, physical condition, socio-economic background, etc. In other words, the University of Twente aims to create an atmosphere, working practice and organizational culture that values differences between people, where people can be themselves and where their talents are utilized. To remove one of the obstacles in this path, namely the language barrier for international staff and students, we have chosen to use English as the official language on campus. In addition to changing the formal language of the organization, it also means that if a person involved cannot speak or understand Dutch, all others involved will switch to English so that everyone will be able to participate in the communication. This is summarized in the Code of Conduct as the inclusivity principle. It is described in Article 1 of the Code of Conduct in accordance with the agreements made in the UT Language Policy.

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1.2:

Communication aimed at students and staff is conducted in at least English, allowing for bilingual communication. Where it concerns individual customer contact – for example in recruitment through social media or from IT service provision – any language agreed with the persons involved may be used in the communication. In addition, the first communication aimed at recruiting prospective students and potential colleagues in the University of Twente's target countries sometimes takes place in the native language (country pages/websites).

In our communication to staff and students, efforts are made at all times to ensure the texts are unambiguous.

1.4:

A subgroup of independent parties closely affiliated with the University of Twente are those parties that organize activities (partly) funded by the University of Twente, such as the Student Union and study associations. Given the importance of the Student Union and the interconnectedness of the study associations with the educational programmes at the University of Twente, these parties are urged to adopt the provisions of the Code of Conduct and the related UT Language Policy. This is to be encouraged and facilitated, for example by offering a translation service, but it should not be enforced. Other parties physically present on campus, such as the COOP and the General Practitioner are also encouraged to align with the University of Twente Language policy.

Article 2. Official language for decision-making and advisory bodies

This article details the language choice for decision-making. This specifically refers to decisions, documents and meetings of formal decision-making and advisory bodies. The documents referred to include policy papers requiring an advice or decision. The official language for decision-making refers to the language used in these documents, the advice and/or decision and meetings, which is English. The decision-making and advisory bodies referred to are listed in the Executive and Management Regulations (Dutch: Bestuurs- en Beheersreglement). Participation bodies as referred to in Section 9.38(c) of the Higher Education and Research Act are addressed separately.

(Translation) WHW Section 9.38, subsection c: Definitions

In this subsection and in Section 9.46 participation body is taken to mean the following:

- a. the joint meeting,*
- b. the works council,*
- c. the body set up based on the system of participation as referred to in Section 9.30 (3) second sentence,*
- d. the University Council,*
- e. the Faculty Council,*
- f. the service council, referred to in Section 9.50,*
- g. delegations of the bodies referred to under a to f,*
- h. the Programme Committee.*

Participation bodies are accessible to all staff and students. Although the participation body itself decides on the formal language, it is strongly advised to follow UT Language Policy, precisely because of this accessibility. In other words, the formal documentation produced by the participation body is recommended to be either in English or bilingual (in combination with Dutch). Where it concerns the spoken language, inclusivity must again be taken as the most important consideration.

Article 3: Official language for education

3.1 - 3.3:

This article details the language selected for the Bachelor's and Master's programmes. The legal framework for this choice is "Dutch, unless...". In other words, the language of education is Dutch, unless one of the situations as specified in Section 7.2 (new: Section 7.2(2)) of the Higher Education and Research Act applies. In this article of the Code of Conduct these legal grounds are translated to the context of the University of Twente. If the official language of an educational programme or component of a programme is English, at least one of these grounds must have been complied with. Permitted also are additional arguments, for example regarding the composition of the group of

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students, specific career prospects and/or the labour market, the learning culture, research domain, intake, partnerships (for example in joint and double degrees) etc.

The UT Language Policy states the following concerning the official language of education: "The University of Twente is seen as one of the pioneers when it comes to the choice of English as the main language in its educational programmes. There are various reasons for offering English-taught education that also apply to other universities, including comprehensive. For the UT, mono-lingual education is especially beneficial because uniform language use enables access to (almost) all programmes. This appeals to the principles of TEM (module-focused, varied curriculum) as well as strengthens our interdisciplinary character. English-taught Bachelor's programmes also ease continuation towards a Master's degree. And, without Dutch as a language barrier, education as well as research can benefit by attracting experts from abroad more easily."

Where the official language of a programme component is concerned, inclusion is the main consideration. In other words, if an educational programme is accessible to non-Dutch speaking students because English is the language of education, these students must be able to complete the entire programme in English. Components of the programme could in addition use Dutch as the official language. Another option is that a specialization uses a different language (Dutch/English) than that of the main programme (English/Dutch). Students must be properly informed of this at all times when enrolling.

3.4:

The new Language and Accessibility Bill regulates the role of participation as follows. Section 9.18 (1)(a) of the Higher Education and Research Act stipulates that the Programme Committee of the public university has right of approval regarding the topic in the Education and Examination Regulations (hereinafter: EER) relating to a programme's language of education, which in the current bill is included in Section 7.13 as a compulsory part of the EER. Under the proposed amendment of Section 9.18, the right to approve this topic in the EER will lie with the Programme Committee. As a result, this topic will be excluded by the amendment of Section 9.38 from the topics in the EER to which the Faculty Council has right of approval.

In short, the choice for an educational programme's official language is up to the programme itself. The Faculty Board may submit a request for this through the Programme Director with the Programme Committee. The Programme Committees has right of approval. The choice of official language and corresponding arguments must be in place before accreditation and re-accreditation, because the new accreditation framework specifically addresses the programme's official language as part of standard 2.

3.7:

Programme-specific communication relates for example to communication by the Examination Board or the Programme managers to the student(s) of the relevant programme. Notifications about UT-wide systems, for example, fall under Article 2.2(a).

Article 4: Language proficiency of students

This article details the minimum entry requirements related to language proficiency. Language proficiency means the extent to which you are able to speak and write a language well. We distinguish between Dutch, English and academic language skills as defined in the footnote to Article 4.4. The main characteristics of academic use of language are the strong abstract component, specialized vocabulary and complex structures. Academic language proficiency therefore requires skills such as logic, strategies to read and interpret different sources, in combination with a critical attitude. In short, academic language skills comprise more than English or Dutch language proficiency and as such are not included as entry requirement.

4.2 - 4.4:

These articles describe the current entry requirements. Any debate on other, possibly higher requirements must be held separately. The outcome of such a debate should naturally be included in this Code of Conduct.

Regarding the entry requirements for language proficiency of international students, the following documents are of importance:

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- The Lisbon Treaty specifies the programmes equivalent to pre-university education (VWO) and may be inspected via: <https://www.njb.nl/wetgeving/wetsvoorstellen/import/verdrag-lissabon-inzake-hoger-onderwijs.5939.lynkx>.
- The Code of Conduct for International Students in Higher Education (hereinafter: International Students' Code of Conduct) is available via: [http://www.vsnv.nl/files/documenten/Gedragscode%20internationale%20student%20hoger%20Onderwijs\(1\).pdf](http://www.vsnv.nl/files/documenten/Gedragscode%20internationale%20student%20hoger%20Onderwijs(1).pdf).

The International Students' Code of Conduct states the following regarding Dutch and English language skills of international students:

- according to Article 4.2 of the International Students' Code of Conduct, Section 7.28(2) of the Higher Education and Research Act applies to demonstrating Dutch language skills: international students at the University of Twente must demonstrate that their proficiency of the Dutch language is adequate by passing the 'Staatsexamen Nederlands als Tweede Taal' (programme II) or the 'Certificaat Nederlands als Vreemde Taal' (CNaVT), 'Educatief Startbekwaam' (B2, formerly PTHO) or 'Educatief Professioneel' (C1, formerly PAT).
- as regards demonstrating English language proficiency, Article 4.2 of the International Students Code of Conduct specifies which scores of accredited certificates correspond with the IELTS score referred to in the Code of Conduct Languages. The University of Twente accepts IELTS, TOEFL, Cambridge CAE and Cambridge CPE certificates with the relevant scores.
- Article 4.3 of the International Students Code of Conduct specifies in which cases international students are exempt from the obligation to take a language test.

The University of Twente Admission Office provides the complete overview of language requirements and certificates that serve as evidence of proficiency of the set language requirement. It also specifies in which circumstances international students are exempt from the obligation to take a language test, for example when students have attended courses in certain English-speaking countries. The full overview can be found:

- Bachelor's: <https://www.utwente.nl/en/education/bachelor/admission/language-requirements/>
- Master's: <https://www.utwente.nl/en/education/master/admission-requirements/language/>

4.6:

For Dutch students who have completed a Dutch-language Bachelor's programme elsewhere (at a university of applied sciences or at another Dutch University), there are no additional language proficiency requirements other than a relevant Bachelor's degree from an accredited Dutch institute to start a Master's programme (Article 4.1). There is a risk, however, that the language proficiency of these students will make it difficult for them to participate in the Master's programme. Therefore it is wise to ensure that the students are fully aware of the language facilities at the University of Twente.

4.9:

Where it concerns evaluating and reviewing the entry requirements for language proficiency, our basic principle is that they are consistent. That means for example that all Bachelor's programmes at the University of Twente have the same entry requirements.

Article 5. Language proficiency of staff

This article details the minimum language proficiency required by University of Twente staff. As part of the UT Language Policy, minimum requirements for English language proficiency have been drawn up per job profile. In addition, a member of staff may perform specific work requiring another (higher) language proficiency.

This article only relates to proficiency in Dutch and English. It does not include the English-language teaching skills of teachers or the academic language proficiency of PhD staff. Nevertheless, these skills are important to perform work at the University of Twente. If a member of staff, therefore, has a development need in this respect, it can be included in the development plan as referred to in Article 5.5 and the University of Twente can support the member of staff in this. When a staff member has reached the desired language proficiency level, the development plan only needs to focus on maintaining that level.

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