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International language certificates in Vietnam's high school graduation and university admissions: a policy analysis

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ABSTRACT

This study critically examines the Eurocentric foundations of Vietnam's education policy, focusing on the Vietnamese Ministry of Education and Training's decision to accept IELTS scores as substitutes for the national English examination in high school graduation and university admissions. Utilizing Foucault's theory of knowledge and power and Carol Bacchi's 'What's the Problem Represented to Be?' (WPR) approach as the analytical framework, the paper interrogates how this policy constructs the 'problem' of English proficiency and its implications within the Vietnamese educational context. The findings reveal that the policy reflects a Eurocentric bias, privileging international standardized assessments over locally developed educational frameworks. This approach marginalizes students from underprivileged backgrounds who may lack access to resources for international test preparation, thereby exacerbating educational inequities in a Global South educational context.

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Introduction

The use of standardized English tests in non-English-speaking countries for educational and employment purposes has become increasingly prevalent under conditions of globalization, where English proficiency is increasingly treated as a measurable form of academic and professional capital. This expansion of testing practices is closely linked to national language policies that prioritize English proficiency as a strategic resource for economic growth and global competitiveness. In many Asian countries, including China, Taiwan, Korea, and Vietnam, governments have explicitly incorporated the enhancement of citizens' English proficiency into national development plans, reflecting a perceived relationship between English language policy, economic growth, and national development (Guo & Sun, 2014; Lee, 2012; Li et al., 2022; Phan, 2021).

Several countries in the Global South across Asia have incorporated standardized English tests such as the International English Language Testing System (IELTS) and

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the Test of English as a Foreign Language (TOEFL) into higher education and employment-related decision-making as concrete policy instruments for operationalizing English proficiency. In Malaysia, for example, employers in the private sector place high value on English communication skills, and standardized test performance is often interpreted as a proxy for graduates' workplace readiness and career advancement potential (Ting et al., 2017). Similarly, Thailand and China have used standardized English test scores in university admission or exit examinations, institutionalizing these tests as formal mechanisms for regulating academic progression (Wudthayagorn, 2022; Yu & Green, 2021). Taken together, these cases illustrate how English proficiency policies are increasingly enacted through standardized testing regimes, positioning tests not merely as assessment tools but as governing technologies that mediate access to educational and employment opportunities.

Vietnam encountered a similar scenario where the demand for English proficiency is rapidly escalating. Doan and Hamid (2019) highlighted that various job sectors seek candidates with higher levels of English proficiency, thereby emphasizing the need for consistent English language training to meet market demands. This demand is echoed in the perceptions of Vietnamese students and educators, who recognize the necessity of English skills for career development and employability (Bui et al., 2017). For seven years from 2019 to 2024, the Vietnamese Ministry of Education and Training (MoET) implemented a policy encouraging the use of standardized English test scores, such as IELTS, TOEFL and SAT (Scholastic Aptitude Test) in high school graduation and university admission criteria (MoET, 2023). Specifically, MoET gives exam exemption and rewards a score 10 out of 10 for the foreign language subject in graduation exams for candidates with an IELTS certificate of 4.0 minimum or some other equivalent certificates, namely TOEFL, TOEIC, Pearson English International Certificate, etc. This decision has sparked mixed reactions among students, teachers, parents, and other stakeholders, highlighting concerns about the disconnect between the curriculum taught and the content assessed in these crucial national exams.

As the educational landscape evolves, particularly in regions shaped by diverse language policies and educational paradigms, it has become imperative to analyze how these dynamics intersect with international assessments like the IELTS. The focus on IELTS in this paper arose from the authors' in-depth knowledge of the Vietnamese education context, observing first-hand the popularity of this international standard exam in the country. Our observation has been supported by scholars such as Vu (2025), Le (2024), Ngo (2021a), and Tran (2019) who have maintained that IELTS has recently become the most popular international language test in Vietnam. For this reason, the current study aims to examine the discourse surrounding IELTS-driven national graduation examination and university admissions, as well as the disentanglement of curriculum, teaching, and learning within the context of Vietnam. By following Bacchi's (2009) 'What is the problem represented to be' (WPR) approach, we aim to problematize and analyze key policy documents regarding the use of IELTS test score in national graduation exam and university admission in Vietnam from 2019 to 2024. The selected time-frame covers the policy's initial implementation through its most recent application at the time of writing. We seek to answer the main research question: What problems

are represented in Vietnamese education policy discourses concerning the adoption of IELTS scores in national graduation examinations and university admissions?

The sub-questions, constructed based on the WPR approach, include:

1. How is the ‘problem’ of English language proficiency represented in policy documents related to the use of IELTS in Vietnam’s education system during the period from 2019 to 2024?
2. What are the underlying assumptions of this representation?
3. What perspectives are left unproblematised or silenced in the policy discourse?
4. What alternative problem representations could be constructed?
5. How and why has this particular representation of the problem come about?
6. What effects (discursive and lived) does this problem representation produce for teachers, students, and institutions?

The power of English and standardized tests

One of the primary motivations for implementing standardized English tests, such as the TOEFL and IELTS, is the global dominance of English as a medium of instruction and its power in international relation, policy, education, and many other realms. As noted by Yan (2024), non-English-speaking countries have systematically integrated English language proficiency tests into their higher education frameworks to support students whose first language is not English or who have not received education in English-medium institutions. The recognition of English as the language of science and research further underscores its significance; research shows that over 98% of international scientific literature is published in English, which positions English proficiency as a critical asset in academic and professional contexts (Ali et al., 2023), and a national priority in many non-Anglophone countries (Phan, 2021).

IELTS has been used to inform decisions in education, work and migration in New Zealand, Australia, the UK or Canada. As a ‘powerful test of a powerful language’, the popularity of IELTS is enabled by ‘complex social, educational, economic and political interests of different stakeholders’ (Hamid, 2015, p. 472), including governments, institutions, parents, students, and different agencies. Notably, IELTS scores are widely used as a crucial entry requirement for non-English speaking background students to be admitted to study in Anglophone countries. It is dubbed as ‘a gatekeeping language proficiency entrance test’ to emphasize its assessment of candidates’ ability to communicate in English to study in an English language-speaking environment (Clark & Yu, 2020, p. 1512). However, as Edwards et al. (2007) stated, these threshold scores [on IELTS or TOEFL] do not mean that students can easily meet the academic demands of their study programs.

The issue of socioeconomic class further complicates the narrative surrounding English language proficiency and the use of standardized testing in various contexts, especially non-Western settings. In a study, Song (2013) argued that the intersection of English with social class dynamics generates distinct inequalities because affluent families are often able to invest heavily in private language education for their children, thereby having more access to international opportunities. This disparity is particularly pronounced in contexts where English proficiency holds significant symbolic and social

values, and even serves as a significant determinant of success in education and employment like South Korea (Song, 2013), Vietnam (Phan, 2021) or other Southeast Asian countries (Lim et al., 2022). Scholars such as T.-H. Choi (2021, p. 670) and Piller and Cho (2013) have respectively cautioned us about the ‘English fever’ (p. 670) and English being positioned as a pivotal element in promoting national competitiveness, while local language needs are undermined, which could negatively affect linguistic diversity and cultural preservation. In South Korea, for instance, despite being viewed as ‘a vehicle of globalization’ (Paik, 2018, p. 122), the neoliberal emphasis of English proficiency has been shown to amplify socioeconomic polarization within this country (Choi, 2021).

In Japan, a policy was proposed to replace the English section of the nationwide college entrance exam (also known as the Common Test) with external proficiency tests, aiming to ‘improve the speaking proficiency of students by directly assessing it in college entrance examinations’ (Butler & Lino, 2021, p. 47). All institutions following this policy needed to decide which designated external tests (including popular tests like IELTS, TOEFL iBT, Cambridge English tests) to accept and learn how to use the test results (such as how to determine the cut-off score). However, students’ English proficiency is greatly influenced by their socioeconomic status, which also impacts the accessibility and affordability of taking external tests. This leads to questions of fairness of such policy (Butler & Lino, 2021).

English language teaching and learning policy in Vietnam

As Ricento (2000) argues, the field of language planning and policy is ‘especially susceptible’ to ‘macro socio-political forces’ (p. 22). It is therefore important to understand the macro sociopolitical landscape that led to the evolution and fluctuations in foreign language teaching and learning policy in Vietnam, the focus of this study, it is essential that the sociopolitical, historical and economic contexts be introduced. The English language does not always have the best relationship with the Vietnamese education system. Previously, because of colonial history, the foreign languages that used to be taught in Vietnam were Han (the Chinese language) and French. However, after the victory over the French invasion in 1954, the foreign language policy landscape experienced significant division. In the North where the education system adopted the Soviet model due to the political and military support that the Soviet Union provided Socialist Vietnam at the time, Russian became the strategically chosen language and enjoyed its prime days (Phan, 2021). The Chinese language also made a brief comeback before facing marginalization again due to political tensions over Vietnam-China borders in the North of Vietnam. Meanwhile, French and English enjoyed widespread popularity in the South of Vietnam, bolstered by the close political, social, cultural, and economic ties between the Republic of Vietnam and the United States during the period from 1955 to 1975 (Phan, 2021). However, the Economic Reform in 1986, known in Vietnamese as *Đổi Mới*, marked a turning point in the political direction, opening up the country to a market-oriented economy rather than staying as a centrally planned economy. Later, the collapse of the Soviet Union in 1991, the trade embargo by the US being lifted in 1994, as well as Vietnamese membership in regional and international organizations such as ASEAN, APEC, the WTO, enabled English to become more

popular in Vietnam, enhancing its social value, and reinforcing its status as the dominant foreign language in the country in the late twentieth century (Le, 2024; Phan, 2021). In the national education system, English has been included as a core component of the high school admission examination in many Vietnamese provinces (Vu, 2025). Before its exclusion in 2025, English was a mandatory part of the national graduation examination for secondary education (Vu, 2025).

One of the most recent and significant transformations in English language teaching and learning in Vietnam is the multi-million-dollar project entitled Teaching and Learning Foreign Languages in the National Education System, Period 2008–2020 (commonly known as National Foreign Language Project or Project 2020), which was approved by the Vietnamese Prime Minister in 2008. Project 2020 aimed to alleviate foreign language proficiency levels among a large cross-section of the Vietnamese population; foreign language proficiency was mostly understood as English proficiency since a large proportion of students across all education levels are involved in learning English as a foreign language (Nguyen & Ho, 2024). As Edmett et al. (n.d.) commented, ‘Project 2020s plans were ambitious in both nature and scale’ (p. 5). For instance, one target was that all high school leavers would exit with a Common European Framework Reference (CEFR) level B1 in their chosen foreign language(s) by the year 2020. In Edmett et al.’s report (n.d.), the project has completed a number of tasks, including establishing a new National Foreign Language Assessment Centre, devising and operating a national six-level proficiency framework named Vietnamese Standardized Test of English Proficiency (VSTEP), which is mapped against the equivalent six-level of the CEFR, introducing a new National Curriculum for English, and the introduction of English as a foreign language in schools from Grade 3, three years earlier than previously (p. 5).

Since 2019, MoET has issued a policy that gives exam exemption and rewards a score 10 out of 10 for the foreign language subject in graduation exams for candidates with an IELTS certificate of 4.0 minimum or some other equivalent certificates. According to the 2023 Annual Report on Foreign Language Teaching and Learning in Vietnam issued by Vietnam National Institute of Educational Sciences and Management Board of the National Project on Teaching and Learning Foreign Languages, more than 28,600 candidates were eligible for exam exemption in 2021, the number markedly leaped to more than 35,000 and nearly 47,000 in 2022 and 2023 respectively (statistics published in MoET website, 2023). In 2023, the number of students in the 16–18 year old group accounted for 30% of the total number of test-takers, marking a remarkable leap from 1.5% in 2018. This statistic indicates the remarkable rise in the number of high-school students taking the IELTS test, which imposes significant implications to the teaching and learning landscape in Vietnam.

Recently in October 2025, a project entitled ‘Making English the second language in schools for 2025–2035, with a vision to 2045’ has been approved through Decision No. 2371/QD-TTg. This project reflects Vietnam’s commitment to global economy integration, workforce skills enhancement and creation of a comprehensive English-language ecosystem. According to this project, English will become a compulsory subject from grade 1 and a second language in schools by 2045. All of these developments are significant because they provide crucial policy context for understanding the growing institutional legitimacy of English and the increasing reliance on international

language certificates within Vietnam's education system. They also shape how language proficiency is problematized and governed in high-stakes assessment and admission policies.

Theoretical and analytical framework

For this paper, we used Bacchi's 'What's the Problem Represented to Be?' (WPR) as the analytical framework. The utilization of WPR enabled us to engage with the 'deep conceptual premises' on which policies are built (Bacchi, 2009, p. xix) and critically question 'the taken-for-granted assumptions that lodge in government policies and policy proposals by interrogating (problematizing) the problem representations it uncovers within them' (Bacchi, 2009, p. xv). Bacchi's WPR framework can be traced back to Foucault's theory of knowledge and power, which posits that these two concepts are intrinsically linked and mutually creating each other.

Foucault's theory of knowledge and power holds that power and knowledge are directly interlinked: power generates knowledge and sustains it, while knowledge institutionalizes and extends the influence of power (Foucault, 1980). According to Foucault (1980), a critical examination of 'particular, local, regional knowledge' together with an examination of erudite knowledge would uncover 'a historical knowledge of struggles' which enables alternative ways of thinking about contemporary social issues (p. 220). This idea is foundational to Bacchi's framework in that policies are not simply neutral responses to problems, but rather sites where problems are constituted through discourses, rooted in power-laden forms of knowledge.

Foucault's theory illuminates Bacchi's framework in several crucial respects. First, knowledge is a product of power, which means whichever institutions in power can construct and legitimize their dominant discourses under a particular knowledge regime. Second, for Foucault, discourse is more than a way of talking but rather 'a complex network of relationships between individuals, texts, ideas, and institutions, with each 'node' impacting, to varying degrees, on other nodes and on the dynamics of the discourse as a whole' (Olsson, 2010, p. 65). Through this lens, a policy does not simply 'solve' a pre-existing issue. Instead, it brings the issue into being by producing discourses to frame and represent the issue. Lastly, Foucault's concept of governmentality, or the 'governance of mentality', refers to 'calculated tactics that guide everyday citizen-subjects to act in accordance with societal norms' (Ettlinger, 2011, p. 538). Governmentality enables us to analyze how policies are part of governing processes that problematize aspects of life in ways that justify interventions.

In short, Foucault's theory of power and knowledge and Bacchi's WPR framework altogether offer a complete theoretical lens to critically analyse language education policy as a discursive and contextually situated practice and interrogate policy for how it reflects, sustains, and extends systems of power. From a Foucauldian perspective, power is not exercised solely through top-down state authority but operates locally through policy discourses that produce particular forms of knowledge, subjectivities, and 'truths' about language, learners, and teachers. Bacchi's WPR framework provides an analytical lens to examine how language education policies construct specific 'problems' and render certain assumptions, solutions, and silences intelligible. Applied to the Vietnamese context, this combined framework highlights how global discourses

surrounding English, competitiveness, and development are recontextualised through local political rationalities, institutional structures, and historical conditions. A detailed analysis of relevant textual evidence will demonstrate that power in language policy is always contingent, negotiated, and locally enacted rather than universal or uniform.

Methodology

Bacchi's WPR analytical framework (2009) puts forward six questions which outline a detailed process of analysis, surfacing presuppositions and assumptions. These six questions (Bacchi, 2012, p. 21) include:

1. What's the 'problem' represented to be in a specific policy or policy proposal?
2. What presuppositions or assumptions underpin this representation of the 'problem'?
3. How has this representation of the 'problem' come about?
4. What is left unproblematic in this problem representation? Where are the silences? Can the 'problem' be thought about differently?
5. What effects are produced by this representation of the 'problem'?
6. How/where has this representation of the 'problem' been produced, disseminated and defended? How has it been (or could it be) questioned, disrupted and replaced?

Bacchi (2012) argued that 'policy is not the government's best effort to solve problems; rather, policies produce problems with particular meanings that affect what gets done or not done, or strategic framing' (p. 22). The aim of doing a policy analysis is 'to understand policy better than policy makers by probing the unexamined assumptions and deep-seated conceptual logics within implicit problem representations' (p. 22)

This study adopts a text-based approach to analyze the Vietnamese policy on using standardized English tests for university admission. This approach is employed because texts can be considered as snapshots of policy discourses, with the language and contents being consciously selected and socially constructed. The policy documents selected in this study are the national landmark policies issued between the years 2019 and 2024 by the Vietnamese MoET, as shown below:

- 1) **Consolidated Circular No. 02/VBHN-BGDĐT** on Regulation for the High School Graduation Examination and the Recognition of High School Graduation, issued on April 19, 2019 by MoET.
- 2) **Circular No. 15/2020/TT-BGDĐT** on the Regulation for the High School Graduation Examination, issued on May 26, 2020 by MoET.
- 3) **Circular No. 02/2024/TT-BGDĐT**, amending the Regulation for the High School Graduation Examination issued together with Circular No. 15/2020/TT-BGDĐT, as amended by Circulars No. 05/2021/TT-BGDĐT and No. 06/2023/TT-BGDĐT, issued on March 6th, 2024 by MoET.
- 4) **Circular No. 24/2024/TT-BGDĐT** on the Regulation for the High School Graduation Examination, issued on December 24, 2024 by the MoET.
(VMoET, 2019, 2020, 2024)

In addition to the four selected policy documents, we reviewed two news articles published by the *Vietnam Journal of Education* (VJE), the official journal of the Vietnamese Ministry of Education and Training (MoET), which discussed the policy changes at the time these documents were issued. We also incorporated six relevant articles from Vietnamese news outlets, including *Vietnamnet*, *VnExpress*, *VTC News* and *Thanh Niên*, which reported on these policy developments and indicated that their coverage was based on information retrieved from VJE and the MoET.

There are two main reasons for selecting these documents for analysis. First, the policy documents are guideline texts issued between 2019 and 2024, representing the most recent ‘prescriptive texts’ (Bacchi, 2009, p. 34) that outline specific action plans within Vietnam’s effort to enhance citizen’s language proficiency and a vision of a bilingual society, particularly regarding English-based university admissions. As such, they are well-suited to address the research questions. Second, the news articles from *VJE*, *Vietnamnet*, *VnExpress*, *VTC News* and *Thanhniên* are publicly accessible and provide formal discussions of national-level policies. Given their broad reach, these articles influence the development of the national curriculum and affect all institutions and individuals engaging with the education system. The selected texts were coded and analyzed using the WPR framework to examine government rationales and their impacts.

While the policy decision examined in this study was formally implemented from 2019 onwards, the emergence and social significance of IELTS in Vietnam can be traced back much earlier. Prior to its explicit incorporation into high-stakes national assessment policies, IELTS had already gained prominence as a marker of English proficiency, international mobility, and academic readiness (Phan, 2021). This earlier diffusion did not directly determine the specific policy provisions analysed in this paper; however, it laid an important socio-political foundation that shaped how IELTS came to be recognized, normalized, and ultimately institutionalized within formal policy frameworks. In this sense, the policy shift after 2019 should be understood not as a sudden rupture, but as a consolidation of longer-standing social and educational practices surrounding international English certification.

Data analysis

The data were analysed using Bacchi’s *What’s the Problem Represented to be?* (WPR) framework, informed by Foucauldian concepts of discourse and power. Analysis followed an iterative, qualitative coding process conducted manually by the authors. All selected policy documents were first read in full to develop familiarity with their content and policy context. The texts were then subjected to close, repeated readings guided by the WPR questions, focusing on how policy problems were represented, the assumptions underpinning these representations, and the silences and effects they produced.

In the initial phase, relevant segments of text were coded deductively according to the core WPR categories, including problem representations, presuppositions, subject positions, and discursive, subjectification, and lived effects. This was followed by an inductive phase in which more specific sub-categories were developed to capture

Table 1. Example of WPR Coding of Circular No. 02/2024/TT-BGDĐT.

WPR question	Analytic focus	Coding example
1. What is the 'problem' represented to be?	Problem representation	Foreign language assessment is framed as an issue of formally recognizing certified competence within the high school graduation examination, rather than addressing disparities in foreign language learning outcomes.
2. What presuppositions or assumptions underpin this representation?	Presuppositions	Standardized foreign language certificates are assumed to be valid, reliable, and equivalent indicators of proficiency, justifying both test exemption and the awarding of a maximum score.
3. How has this representation of the 'problem' come about?	Policy genealogy	This representation has developed through successive ministerial circulars amending graduation regulations, reflecting a policy shift toward accommodating external credentialing within national assessment practices.
4. What is left unproblematic? Where are the silences?	Silences	Unequal access to foreign language certification, including socioeconomic, geographic, and institutional differences, remains unaddressed.
5. What effects are produced by this representation?	Discursive and subjectification effects	The policy produces differentiated student subject positions, constructing certificate holders as already competent and legitimizing credential-based exemptions while positioning other candidates as comparatively deficient.
6. How/where is this representation produced, disseminated, and defended?	Policy dissemination and stabilization	The representation is produced and circulated through MoET circulars and official guidance, and is defended through public news outlets.

Again, all coding categories and analytic interpretations were inductively developed through close, repeated readings of the policy texts, guided by the WPR framework, rather than being imposed a priori.

recurring patterns across documents. Coding was refined through constant comparison, with earlier interpretations revisited and adjusted as the analysis progressed.

Throughout the analytic process, reflexive notes and analytic memos were used to document coding decisions and emerging interpretations. The final stage of analysis involved synthesizing the coded material to identify dominant governmental rationales and to examine how particular problem representations shaped policy meanings and their potential effects. An example of the coding process is provided in [Table 1](#):

Findings

As also theorized by Bacchi (2023), three tasks are involved in applying WPR to any topic: 'First, ensuring adequate background to be able to interpret the selected text/s; Second, identifying 'proposals' in the text/s in order to 'read off' implicit problem representations; Third, asking the WPR questions' (Bacchi, 2023, p. 235). Accordingly, the findings begin by situating the selected texts within a broader policy landscape to establish the context in which the problem is conceptualized. We then analyze the texts to identify the policy proposals they put forward. Finally, we ask the WPR questions to interrogate the underlying problem representations and assumptions. It should be noted that using the WPR approach means we, as researchers, do not seek to identify the 'intentionality' (Bacchi, 2009, p. xix) of a specific policy or of policy makers, rather, we are concerned about the 'deep conceptual premises' (Bacchi, 2009, p. xix), or the 'taken-for-granted assumptions' (Bacchi, 2009, p. xv) on which policies are built, as well as the discursive assumptions decoded from the policy.

In this paper, the circulars issued by MoET and the news articles from VJE, Vietnamnet, VnExpress, and Thanhnien serve as the ‘prescriptive text’ to allow reflection on the connections between foreign language education and governing practices.

Circular No. 02/2024/TT-BGDĐT, which amends the Regulation on the High School Graduation Examination issued together with **Circular No. 15/2020/TT-BGDĐT** (as amended by **Circulars No. 05/2021/TT-BGDĐT** and **06/2023/TT-BGDĐT**), introduced provisions allowing the use of foreign language certificates in place of foreign language test scores in the national high school graduation exam.

Article 32 of Circular No. 02/VBHN-BGDĐT included a policy on exemption from the foreign language test in the graduation recognition process for candidates holding one of the certificates specified in MoET’s annual guidelines for organizing the high school graduation examination. It states, ‘Candidates who are exempt from the foreign language test will be awarded a score of 10 for this subject in the consideration for high school graduation recognition.’ However, high school graduation foreign language scores did not overlap with university or college admissions. MoET emphasized the need for high schools to guide students against the misconception that simply having a valid certificate guarantees a score of 10 in foreign languages for university admission (Vietnamese Ministry of Education and Training, 2024).

In 2024, **Circular No. 24/2024/TT-BGDĐT** no longer assigned a default score of 10 to all high school graduation candidates holding foreign language certificates that meet the minimum requirements set by the Vietnamese MoET. Instead, such candidates were only granted exemption from the foreign language exam. At the same time, universities published score conversion tables matching foreign language certificates to actual exam scores. For example, ‘Hanoi University of Science and Technology has set strict equivalencies: an IELTS score of 5.0 is equivalent to 8.5 points; IELTS 5.5 to 9 points; IELTS 6.0 to 9.5 points; and IELTS 6.5 or higher to 10 points’ (Vietnam Journal of Education, 2025).

These policies, though varying in the logistics of execution, all proposed that individuals who hold specific foreign language certificates are exempt from taking the national foreign language exam as part of the high school graduation process. They also proposed that universities and colleges use results from foreign language certificates to accept candidates according to their own bench mark.

Given that governing is a problematizing activity (Bacchi, 2023), foreign language, most specially English language education is deemed to be a ‘problem’ due to the fact that it was targeted for legislative intervention. The very acceptance of international standardized test scores in place of the national graduation foreign language tests signals that the issue of foreign language, most specially English language education, is being problematized. As specified earlier, within the limit of this paper, we only focus on the use of the IELTS rather than certificates of other languages, given that English testing candidates account for the largest percentage of all foreign language candidates (VJE, 2025). In what follows, we present our analysis by answering six questions in Bacchi’s WPR approach, which also answers our research sub-questions.

Question 1: what is the ‘problem’ represented to be?

From the discourse of the circulars emerges an implicit problem, which is that the national graduation foreign language exam is unnecessary or redundant for students

who already demonstrate sufficient proficiency through international or certified assessments. This representation justifies the shift toward accepting international language certificates – particularly IELTS – as an alternative assessment tool.

Additionally, the revision in **Circular No. 24/2024**, which removed the automatic score of 10 and allowed university to decide on their own equivalency tables, further refines the problem as one of misalignment and unfair advantage, where the former policy risked distorting meritocratic selection for high school graduation. Thus, the problem is also represented as a need for fairness, consistency, and transparency in evaluating foreign language proficiency across educational transitions.

Question 2: what presuppositions or assumptions underlie this representation of the ‘problem’?

Several underlying assumptions are discursively embedded in the proposal to exempt students with certain foreign language certificates from the national exam. Viewed through Bacchi’s WPR lens, this policy can be read as a particular problem representation of foreign language assessment for graduation purposes. This representation rests on taken-for-granted presuppositions that recognized international tests, such as IELTS, constitute acceptable indicators of language proficiency and can substitute for national assessment. These presuppositions are interpreted as assumptions constituted within the policy discourse itself, not as statements of policymakers’ intentions. Importantly, the policy does not explicitly articulate how equivalence between international certification and the national examination is established. As a result, the representation remains open to multiple readings, including the interpretation that the policy seeks to align, or elevate, the national graduation examination to internationally recognized standards, rather than to devalue it.

This proposal further reflects a broader assumption that foreign language education, particularly English, is instrumental, quantifiable, and best assessed through standardized certification rather than holistic or curriculum-based evaluation even though research has pointed out that standardized tests like IELTS can only test a sub-set of academic language skills rather than a full range of language abilities (Green, 2007). Moreover, the proposal suggests a policy orientation that values efficiency and procedural streamlining in education governance, particularly in processes like high school graduation recognition. By privileging externally issued credentials, the policy promotes a technocratic approach that aligns with global benchmarking practices as the primary means of evaluation for graduation purposes.

Question 3: how has this representation of the ‘problem’ come about?

This representation of English language education as a ‘problem’ best solved through international certification has emerged through the interplay of neoliberal rationalities and global policy borrowing (Bacchi, 2016), both of which are central to Bacchi’s understanding of how governing practices construct and circulate problem representations.

From a neoliberal perspective, education policy increasingly adopts a logic of market efficiency, individual responsibility, and performance measurement (Hursh, 2000). Under this rationality, students are treated as self-managing subjects who must accumulate credentials – particularly those with international recognition – to compete in globalized labor and education markets. Language proficiency, especially in English, is

not framed as a communicative or cultural asset but as a quantifiable skill that must be verified through standardized testing. This framing aligns closely with neoliberal governance, where policies emphasize accountability, benchmarking, and privatization – often resulting in the outsourcing of assessment authority to commercial testing bodies such as IELTS. As Foucault (1980) would say, the privileging of international language certifications such as IELTS represents a form of knowledge that does not merely evaluate language ability but defines what counts as legitimate language proficiency and, by extension, who is recognized as a successful student and who has the authority to measure the success.

This construction is also deeply influenced by global policy borrowing, a phenomenon where countries adopt education models, standards, or practices from perceived ‘best practice’ systems (Steiner-Khamsi, 2021), often in response to international rankings or comparative pressures (e.g. PISA). In Vietnam’s case, ongoing efforts to reform its education system – such as the *National Foreign Language Project 2020* and MoET’s subsequent policies – reflect a desire to harmonize national standards with international norms. The recognition of international certificates in lieu of national exams signals a clear instance of policy borrowing, where the perceived legitimacy of external systems leads to the partial displacement or devaluation of domestic ones.

These two forces – neoliberal rationalities and global policy borrowing – mutually reinforce each other in shaping a policy environment where the ‘problem’ of language education is no longer about improving teaching or national assessment practices, but about ensuring students can meet global standards as efficiently as possible. As such, these forces can be seen as part of a broader apparatus of governmentality (Foucault, 1980), where the state produces a powerful and largely unchallenged discourse that problematizes the national foreign language exam while normalizing external certification as the solution.

Question 4: what is left unproblematic in this problem representation? Where are the silences? Can the ‘problem’ be conceptualized differently?

One major silence in the representation of the ‘problem’ as the need for international certification in place of national assessments is the challenge it poses to teachers. The policy assumes that foreign language education can be seamlessly aligned with international standards, yet it leaves unproblematic the tension this creates for teachers who are expected to deliver the national curriculum while also preparing students for international standardized tests. In practice, these two demands are not always compatible. While both the national foreign language examination and international tests such as IELTS are test-based and operate within an exam-oriented educational context, they differ in their orientation and content. The national exam primarily assesses discrete language knowledge through multiple-choice formats, whereas IELTS emphasizes academic English skills across four tested modalities within a standardized international framework. As a result, reliance on IELTS may shift instructional focus toward test preparation practices that are further removed from locally grounded curricular objectives. Instead of identifying Vietnamese educational priorities and strengthening the cultural content, which are already largely absent from international proficiency tests, substituting IELTS for the national examination may intensify existing test-oriented practices rather than mitigate them.

As a result, teachers are caught between competing priorities. On one hand, they are held accountable for delivering curriculum objectives; on the other, they are pressured – either by schools, parents, or students themselves – to ‘teach to the test’ to secure international certificates. This dual expectation can lead to increased workload, instructional fragmentation, and even professional disempowerment, as pedagogical decisions become shaped more by test formats than by educational values or classroom realities. Furthermore, this strain is especially pronounced in under-resourced schools, where teachers may lack training or materials aligned with international exams.

From a Foucauldian perspective, this silence is not accidental but a product of power/knowledge dynamics, where international standardized tests function as powerful truth claims about what counts as valid language proficiency. By leaving these challenges unaddressed, the policy’s problem representation fails to consider the systemic pressures placed on educators. A different way of framing the problem would shift focus from the need for international certification to the need for better support for teachers, including professional development, curriculum integration strategies, and more equitable assessment systems that reflect both national goals and global competencies.

Question 5: what effects (discursive, subjectification, lived) are produced by this representation of the ‘problem’?

The discursive effects of the policy proposal reinforce a view of foreign language education as inherently test-based and credential-driven, rather than holistic, communicative, or embedded in contextual learning. By accepting international test scores as substitutes for national exams, the policy elevates standardized testing as the dominant mode of evaluating language ability. This move implicitly positions international standards – such as IELTS – as more legitimate or trustworthy than national assessments, thereby reinforcing a hierarchy of assessment systems. Such discursive framing contributes to a narrative that values externally validated performance over locally developed measures of language competence.

In terms of subjectification effects, the policy constructs students primarily as test-takers and credential holders. Their language proficiency, and by extension their educational worth, becomes defined by their ability to secure recognized certificates rather than through broader communicative competencies or classroom engagement. This shift also impacts teachers and schools, which may feel increased pressure to align instruction with the formats and expectations of international exams. Consequently, there is a risk that the national curriculum may be sidelined in favor of test-preparation strategies, narrowing the scope and intent of language education.

The lived effects of the policy are particularly significant in terms of equity. As shown in [Figure 1](#), the number of students being exempted from the National Graduation Foreign Language Exam in Hanoi, the metropolitan capital city of Vietnam, increased steadily over the years since the beginning of the new policy. Hanoi has consistently had the highest number of exempted candidates nationwide throughout all six years of the policy. In 2024, its candidates made up a record 32% of all students granted exemptions (Vietnamnet, 2024). This exemplifies the fact that students from more privileged backgrounds are more likely to have access to international language testing opportunities, including the financial means, institutional support, and exposure required to succeed in them. As a result, the exemption policy may

STUDENTS EXEMPTED FROM NATIONAL GRADUATION FOREIGN LANGUAGE EXAM

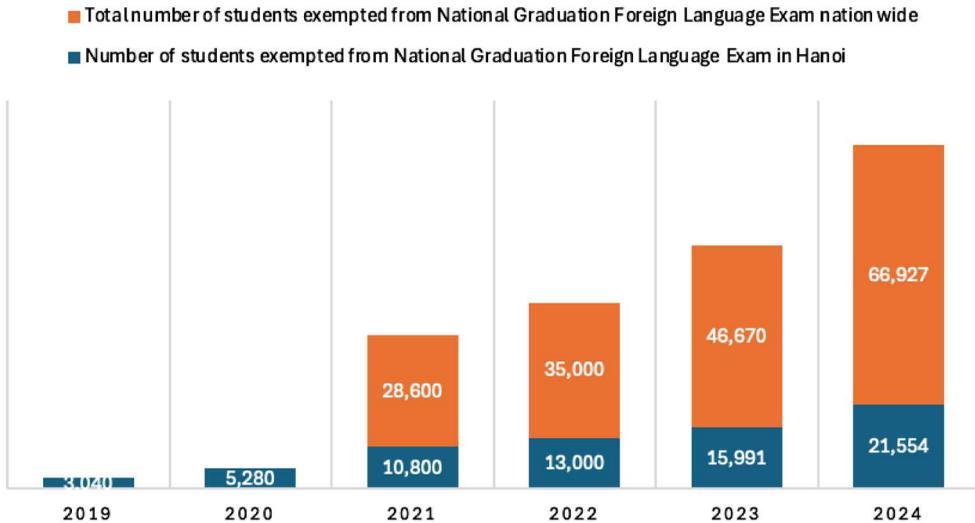


Figure 1. Number of students exempted from National Graduation Foreign Language Exam in Hanoi. Note. Data compiled by authors from VnExpress (2021, 2023), Vietnamnet (2024) & Thanhnien (2023). Note: Data for students exempted nationwide in 2019 and 2020 could not be retrieved due to disruptions caused by the COVID-19 pandemic.

inadvertently reinforce existing educational inequalities by rewarding those who can afford international certifications. Furthermore, by allowing such certificates to bypass the national exam system, the policy may de-incentivize trust in or the perceived value of national assessments, leading to a dual-track system that privileges some students while marginalizing others.

Question 6: how and where has this representation of the ‘problem’ been produced, disseminated and defended? How has it been and/or how can it be disrupted and replaced?

The representation that national foreign language exams are inadequate, and that IELTS or similar certificates are a better alternative, has been institutionalized in official legal documents, such as Circular No. 02/2024/TT-BGDĐT and Circular No. 24/2024/TT-BGDĐT. These texts embed policy assumptions into regulatory frameworks, giving them legal authority. Higher education institutions have further legitimized this representation by publishing their own conversion scales for IELTS and other certificates, thereby integrating international testing into domestic admissions. On top of this, MoET’s journal, VJE, and other popular press outlets have played a role in normalizing this framing, presenting the use of IELTS in high school graduation and university admissions as a common, logical, modern development aligned with global trends. For example:

In recent years, international foreign language certificates have been incorporated into the admissions schemes of some universities and have become increasingly common. [...] To date, approximately 40 universities have announced their proposed admissions plans for 2025, many of which convert international foreign language certificates into English subject scores. (VJE, 2025)

While some news articles reported on the increasing popularity of universities using international certificates for admission, others painted candidates with international certificates as having undeniable advantages:

The use and conversion of IELTS scores in university admissions has become increasingly widespread, as not only top economics universities but also institutions in technical, medical, and health-related fields consider IELTS-certified applicants. As a result, IELTS is often regarded as a ‘golden ticket’ that enhances students’ competitive advantage and increases their likelihood of gaining university admission. (VTC News, 2025)

This representation could be disrupted in several ways. One alternative could emphasize the strengthening of national assessment tools and the cultural and contextual relevance of domestic exams over imported standards. This would shift the problem from one of aligning to global tests to one of building capacity within the local system. Another grass root alternative could be drawn from the opinions of teachers, students and parents, whose lived experiences could reframe the ‘problem’ as one of unclear policy, systemic inequality, and lack of participation in decision-making.

Discussions and conclusion

This Discussion revisits the key findings through Bacchi’s *What’s the Problem Represented to be?* (WPR) framework and Foucauldian concepts of power and knowledge. Each subsection is explicitly grounded in the empirical patterns identified in the Findings section, particularly those relating to certificate substitution, score conversion practices, and the expanding role of IELTS in Vietnam’s assessment landscape.

Inequity in power and knowledge resulting from the neoliberal framework of English language policy

This section builds on the findings showing how international English language certificates were permitted to substitute for national examinations and were converted into maximum scores in the first few years of the policy, practices that differentially advantage students with access to IELTS preparation and certification.

From a Foucauldian perspective, the incorporation of IELTS into university admissions and graduation-related assessment can be understood as a technology of power (Foucault, 1988) that regulates what counts as legitimate language knowledge. Within this policy arrangement, IELTS functions not only as a gatekeeping mechanism but also as a normative reference point through which English proficiency is defined, measured, and valued. In Bacchi’s terms, the policy represents the ‘problem’ of English language assessment as one of credential recognition and comparability, rather than as an issue of learning conditions, curricular coherence, or educational equity.

This problem representation rests on taken-for-granted presuppositions about the authority and validity of international standardized tests. As Clark and Yu (2020) noted, the official description of IELTS emphasizes readiness ‘to begin studying’ and assessment of ‘some of the features of language used in academic study’. According to these researchers, the first phrase indicates that IELTS test-takers are not ‘actually at the required stage yet, but that further efforts in English language development will be required as part of the degree process’ (p. 153), and the second phrase means IELTS scores alone do not allude to successful academic performance of the test-takers. These formulations suggest that IELTS does not claim to measure full academic or professional competence, nor to predict academic success. Other studies similarly point to the distinction between IELTS writing tasks and the demands of academic writing in degree programs, emphasizing that linguistic development continues during university study (Deygers, 2018). Read through a WPR lens, the policy does not assert that IELTS guarantees academic success; rather, it operates as if certified proficiency is sufficient for exemption or conversion within national assessment structures. This discursive move invites scrutiny not of policymakers’ beliefs, but of the assumptions embedded in the policy design itself.

The effects of this problem representation become visible when situated within Vietnam’s broader sociolinguistic landscape. English has undergone a profound ideological transformation from a language associated with historical conflict to one linked to aspiration, mobility, and modernity (Bui & Nguyen, 2016; Phan, 2021). In this context, international English tests function as symbolic capital, conferring advantage on those able to access intensive preparation, repeated test sittings, and private tutoring. As Bacchi’s framework directs attention to policy effects, the findings show how this arrangement privileges certain forms of knowledge and practice while rendering others invisible. For instance, students from rural or economically disadvantaged backgrounds are structurally constrained in their ability to accumulate such credentials, reproducing existing inequalities (Le, 2022; Nguyen & Hamid, 2020).

Within a neoliberal rationality of education (Ball, 2012), IELTS scores become commodified as individual capital, attainable through market participation rather than through public schooling alone. Learners are positioned as self-responsible subjects tasked with investing in credential acquisition to secure exemption or advantage. As Shohamy (1998) argued, language tests are never neutral instruments but operate within ideological struggles over what knowledge is valued and who gains access to opportunity. In this sense, the use of IELTS in Vietnamese policy illustrates how assessment practices can function as mechanisms of governance that stratify learners and reconfigure educational values.

Tensions between the agendas of internationalization and localization of English language teaching and learning

The discussion of tensions between internationalization and localization draws directly on findings documenting the coexistence of international tests (IELTS), national English examinations, and locally developed assessments such as VSTEP within Vietnam’s policy framework.

The adoption of IELTS results in the university admission process, in our argument, draws us to the tension between the internationalization and localization agendas of English language teaching and learning in Vietnam and similar contexts elsewhere. On the one hand, the English language enjoyed its prominence in Vietnam, with ‘those who can speak English often being perceived as bound for future success’ (Vu, 2025, p. 1). Despite this privilege status, English education in public schools in the country has often been met with criticism for being heavily focused on grammar and overly exam-oriented and ineffective, which fails to enable students to use the language communicatively and authentically (Le, 2019). This contributes to a perception that international standardized tests can offer a more comprehensive and accurate reflection of language proficiency than English national exams where assessment of communicative competences is absent.

On the other hand, there have been recognized efforts to localize the teaching and learning of English in Vietnam. The Foreign Language Competency Framework for Vietnam, a six-level framework for assessing foreign language proficiency, was issued via Circular No. 01/2014 (MoET, 2014). This framework, together with the VSTEP test, received praise for being a milestone in the progress of Project 2020 and could be argued to be attempts to decolonize knowledge, embrace local agency and promote a more inclusive, grounded, context-sensitive language education and assessment. Nonetheless, it was also argued to be a ‘near translation of the CEFR’s can-do statements’ (Ngo, 2018, p. 48). The VSTEP, envisioned as a locally-produced test that is a more affordable substitute for international exams like IELTS, is criticized for its lack of efficiency in education critical decision-making (Ngo, 2021b). Additionally, VSTEP cannot be used for those who aspire to an international education. The Vietnamese in-house language test, therefore, is only favorable within a limited group of Vietnamese students. One may wonder if the attempt to recognize English as a pluralistic and dynamic resource and localize the English proficiency test have had the unintended consequence of reinforcing, rather than challenging, test takers’ reliance on and deference to international standardized assessments.

We then argue that the incorporation of IELTS into the national graduation examination represents competing forces of internationalization and localization, while simultaneously raising significant social, economic, and cultural concerns. In many universities, IELTS or IELTS-equivalent test score is a graduation requisite. Since 2019 when standardized tests are accepted in replacement of an English test in the national graduation exam, IELTS has established ‘a status quo’ in which it renders ‘an educational craze’ in Vietnam (Vu, 2025, p. 3). In early 2024, several high schools implemented a policy exempting students with IELTS scores from their admission exams. Although MoET almost immediately intervened to stop such a policy from being implemented and adopted widely, it clearly signaled the expanding authority of IELTS and its rising popularity among schools, parents and students.

Consequently, according to Le (2024), the intense focus on IELTS has fostered a problematic trend in English language learning and teaching in Vietnam. There has been growing concern about the increasingly younger age at which students begin preparing for the IELTS examination, and the problematic conflation of long-term English language acquisition with short-term, test-oriented learning aimed primarily at obtaining an IELTS certificate. This issue raises critical questions about whether the policy of adopting IELTS reflects an uncritical imposition of Anglo-centric standards that often fail to align with or acknowledge local epistemologies and culturally grounded ways of

knowing (Pennycook, 1998). At the same time, efforts to localize English language assessment such as establishing VSTEP will be seriously undermined and risk becoming a significant waste of resources, given the strong preference of Vietnamese test takers for the IELTS.

Lastly, nascent evidence indicates that the 2025 national high school graduation English exam, designed by the Vietnamese MoET, reached a difficulty level roughly equivalent to a 7.5 on the IELTS scale, which was significantly more challenging than the official sample test released also by the MoET just months prior to the actual exam (VnExpress, 2025). This development suggests a deliberate alignment of the national examination framework with the structure and standards of the IELTS. If this trend continues, the national curriculum risks becoming increasingly disconnected from the assessment. Alternatively, and perhaps more problematically, it may become narrowly tailored to the test format, leaving little room for localized pedagogies or indigenous epistemologies.

In conclusion, this study demonstrates how the adoption of international English proficiency tests within national assessment systems is not merely a technical policy choice, but a discursive and political intervention with significant social consequences. By applying Bacchi's WPR framework and Foucauldian concepts of power and knowledge, the analysis shows how policies authorize particular forms of knowledge, produce differentiated learner positions, and reconfigure educational value under conditions of neoliberal globalization. While the international tests function critically in assessing language proficiency and facilitating access to international academic and professional opportunities, educators and policymakers must remain attuned to the complexities and challenges posed by reliance on these assessments. Understanding the linguistic landscape within which these students operate is vital for fostering equitable and effective education systems that promote meaningful engagement with English language learning, educational equity, cultural epistemologies, and national imaginaries under conditions of neoliberal globalization.

Empirically, this paper offers one of the first analyses of Vietnam's policy allowing international language certificates to replace national English tests since its implementation in 2019. Analytically, it contributes to the literature on language policy and planning by illustrating how global testing regimes are recontextualised within a highly exam-oriented national system. For an international audience, the Vietnamese case provides insights relevant to other contexts where international assessments increasingly mediate access to education, highlighting the need to critically examine not only what policies aim to achieve, but how they represent problems, distribute power, and shape educational futures.

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Data availability statement

The data that support the findings of this study are available from the corresponding author, [ANQP], upon reasonable request.

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