



COUNCIL ON SOCIAL WORK EDUCATION

STRENGTHENING THE PROFESSION OF SOCIAL WORK

Leadership in Research, Career Advancement, and Education

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May 8, 2018

Ms. Jennifer Hong

Executive Director/Designated Federal Official, National Advisory Committee on Institutional Quality Integrity (NACIQI)

U.S. Department of Education

400 Maryland Avenue SW, Room 271-03

Washington, DC 20202

Dear Ms. Hong,

This letter is submitted on behalf of the Commission on Accreditation (COA) of the Council on Social Work Education (CSWE). This written statement is limited to addressing NACIQI's authority as outlined under section 114 of the *Higher Education Act* and does not pertain to any particular agencies whose renewal of recognition shall be under consideration at the May 2018 meeting of NACIQI.

The COA confers accreditation status on schools of social work and baccalaureate and master's social work programs. Additionally, the COA is responsible for both formulating accreditation standards and policies and determining the criteria and process for evaluating these standards. As the sole accrediting body for social work programs in the United States and its territories, the COA establishes expectations for academic quality through its Educational Policy and Accreditation Standards (EPAS).

Programmatic accreditation serves an important function in ensuring the competent preparation of students for entry into or advanced practice in a field or discipline. By drawing upon professional judgments and implementing a systematic examination of compliance with established standards, programmatic accreditors have the unique ability to set and assess quality measures within diverse institutions and regional environments. Programmatic accreditors are equipped with the expertise and knowledge necessary for improving programs, ensuring quality, and promoting competence in professional practice.

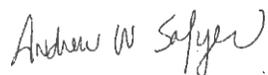
Recent proposals around accreditation, however, would make efforts by programmatic accreditors to promote quality and professional expertise difficult. H. R. 4508, the *Promoting Real Opportunity, Success, and Prosperity through Education Reform (PROSPER) Act*, a bill to reauthorize the *Higher Education Act* (HEA), includes a proposal to require accrediting agencies to be "separately incorporated" from any agency or association.ⁱ Currently, accrediting entities must be "separate and independent" from an agency or association.ⁱⁱ The current statute ensures that programmatic accreditors involve stakeholders while protecting against conflicts of interest. Programmatic accreditors that have relationships with sponsoring stakeholder organizations exercise extreme vigilance and implement robust safeguards to ensure that these organizations do not exert undue influence on the vital accreditation process.

In the case of the COA, a Memorandum of Understanding (MOU) between the CSWE Board of Directors and the CSWE Commission on Accreditation (COA) affirms CSWE's role in approving educational policy, but it delegates to the COA the sole authority to develop and adopt accreditation standards. The MOU notes that CSWE and the COA are “independent contractors” and emphasizes the strict division between the two entities. Other programmatic accreditors employ similar structures to ensure this firewall by ensuring that their accrediting agency is an “autonomous organization,” has “complete autonomy,” or employs a “Memorandum of Agreement” to allow for the independence of the accrediting agency.

Programmatic accreditors like the COA take their responsibility of ensuring academic quality and professional competency seriously. As such, the COA believes NACIQI should recommend legislative language be drafted that would explicitly recognize that the relationship between accrediting agencies and sponsoring stakeholder organization does not require a “separate incorporation” of the accrediting agency. NACIQI’s *2018 Accreditation Policy Recommendations on Regulatory Reform* included recommendations that the Secretary of Education request enabling legislative language to be drafted.ⁱⁱⁱ

The Educational Policy and Accreditation Standards approved by the COA state, “The purpose of the social work profession is to promote human and community well-being.” As a programmatic accreditor, the COA is committed to an accreditation practice that makes possible the development of a social work profession which is able to “promote human and community well-being.” Programmatic accreditors recognize the solemn duty and responsibility they have to ensuring fairness, quality, objectivity, and rigor in the accreditation process. Proposals that would change the relationship between accrediting entities and their sponsoring stakeholder organizations would threaten this process. The COA thanks NACIQI for its commitment to ensuring academic quality for institutions and programs of higher education.

Sincerely,



Andrew Safyer, Ph.D.
Chair of the Commission on Accreditation

ⁱ <https://www.congress.gov/115/bills/hr4508/BILLS-115hr4508rh.pdf>

ⁱⁱ 20 USC 1099b

ⁱⁱⁱ <https://sites.ed.gov/naciqi/files/2018/02/Regulatory-Reform-Recommendations-FINAL.pdf>