



[Docket ID ED—2010—OPE—0012]

September 9, 2010

Ms. Jessica Finkel
U.S. Department of Education
1990 K Street, NW., Room 8031
Washington, DC 20006-8502

Dear Ms. Finkel,

On behalf of the Council on Social Work Education (CSWE), I would like to thank you and the Department of Education for allowing us the opportunity to submit comments on the proposed rule regarding program integrity and gainful employment.

CSWE is a nonprofit national association representing more than 3,000 individual members, as well as 650 graduate and undergraduate programs of professional social work education. The organization was founded in 1952 and comprises a strong partnership of educational and professional institutions, social welfare agencies, and private citizens. Recognized by the Council for Higher Education Accreditation (CHEA) as the sole accrediting agency for social work education in the United States, CSWE accredits social work degrees at both the baccalaureate (BSW) and master's (MSW) level.

We applaud the work of the Department in trying to ensure that degree and certificate programs that are offered across the country are meeting a high standard of quality and will reward the investments of taxpayer dollars and students' time and efforts with employment opportunities. The field of social work has a history of supporting this foundation of high standards.

As you may know, there are no two-year degree or certificate programs for the field of social work. Certificates may be awarded as part of a social work program's effort to help practitioners meet continuing education requirements for licensure or as an enhancement to the BSW or MSW, but not as a qualification for a job in a particular position that requires the social work degree. These are not regulated by CSWE. The BSW is the minimum entry level degree required to practice social work and the MSW is accepted as the terminal, advanced practice degree. It is not uncommon for practitioners to continue their education at a higher level, ultimately acquiring a significant amount of debt. Social work continues to be a high-needs profession. Individuals are needed to serve in rural and remote areas; in fields including geriatrics, substance abuse, child and adult protective services, and mental health; and with high needs populations such as racial and ethnic minorities, immigrants, Veterans, and individuals with disabilities.

CSWE member institutions are encouraged to identify ways to collaborate with community colleges and two-year programs in related fields, such as articulation agreements with human services programs, to increase opportunities for students in those programs to continue their education and

advance in a course of study that would lead to practice in a high need profession. Therefore, we as accreditors appreciate the Department's increased oversight on free standing certificate programs.

However, we note that the proposed rules allow the Department significant authority over the approval of new certificate programs. As an accrediting body, we are concerned that this could set an unfortunate precedent which would allow the Department expanded authority to take on the role of an accrediting organization.

In regards to proposed § 668.7(g), we appreciate the Department's efforts to coordinate and communicate with accrediting bodies if the new program in question "constitutes a substantive change" by requiring the institution, in its application submitted to the Department for the new program, to provide documentation of approval by the program's accrediting agency. However, we strongly encourage the Department to consider changes in regards to determining whether a "program's curriculum aligns with recognized occupations." We feel it would duplicate the work and undermine the role of accrediting bodies to require "documentation from employers not affiliated with the institution," if this is an integral part of the accreditation process, as it is for many professional programs including social work.

Please do not hesitate to contact me or CSWE's Government Relations Representative Wendy Naus (202-289-7475, Wendy@lewis-burke.com) should you have any questions or if any additional information would be helpful.

Additionally, as a member of the American Council on Education (ACE) and CHEA, we support the comments that these two organizations have put forth on the 14 proposed rules related to program integrity and avoiding abuses of federal financial aid programs.

Best regards,

A handwritten signature in black ink that reads "Julia M. Watkins". The signature is written in a cursive, flowing style.

Julia M. Watkins
Executive Director
Council on Social Work Education