



COUNCIL ON SOCIAL WORK EDUCATION

STRENGTHENING THE PROFESSION OF SOCIAL WORK

Leadership in Research, Career Advancement, and Education

1725 Duke Street, Suite 500, Alexandria, VA 22314-3457 TEL 703.683.8080 FAX 703.683.8099 www.cswe.org

OFFICE OF THE
EXECUTIVE DIRECTOR

September 8, 2009

Ann Clough
U.S. Department of Education
1990 K Street, NW
Room 8043
Washington, DC 20006-8542

Dear Ms. Clough,

The Council on Social Work Education (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. Founded in 1952, this partnership of educational and professional institutions, social welfare agencies, and private citizens is recognized by the Council for Higher Education Accreditation (CHEA) as the sole accrediting agency for social work education in this country.

This letter serves to provide comments regarding the proposed rules issued by the Department of Education in the August 6, 2009, Federal Register Pages 39497- 39533, regarding 34 CFR part 602, governing the Secretary's recognition of accrediting agencies. The Secretary is amending these regulations to implement changes to the Higher Education Act of 1965, resulting from enactment of the Higher Education Reconciliation Act of 2005 (HERA), Public Law 109-171, and the Higher Education Opportunity Act (HEOA), Public Law 110-315, and to clarify, improve, and update the current regulations.

Record Keeping and Confidentiality (§§602.15, 602.27)

CSWE would like to comment specifically on the proposed new rule which would require accrediting organizations, under certain conditions, not to inform institutions and programs regarding a federal inquiry by the Department of Education, at the specific request of the Secretary. CSWE joins CHEA in expressing concern that this proposed rule may undermine the trust relationship between institutions and accreditors. Like CHEA we believe this trust relationship to be essential to effective peer/professional review. We ask that this proposed rule not be accepted in the final rules.

Please feel free to contact me with any questions.

Sincerely,

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

Julia Watkins, PhD, MSW
CSWE Executive Director