



COUNCIL ON SOCIAL WORK EDUCATION

STRENGTHENING THE PROFESSION OF SOCIAL WORK

Leadership in Research, Career Advancement, and Education

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The Honorable Lamar Alexander
HELP Committee Chairman
United States Senate
Washington D.C. 20510

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Dear Chairman Alexander,

On behalf of the Council on Social Work Education (CSWE) thank you for the opportunity to provide input on the *Higher Education Accountability* white paper. We are committed to ensuring and enhancing the quality of social work education and appreciate this opportunity. CSWE is the national association representing social work education in the United States. Its members include over 800 accredited baccalaureate and master's degree social work programs, as well as individual social work educators, practitioners, and agencies dedicated to advancing quality social work education. Furthermore, CSWE's Commission on Accreditation is recognized by the Council for Higher Education Accreditation as the sole accrediting agency for social work education in the United States and its territories.

As the white paper states, "accreditors are responsible for ensuring academic quality... and the U.S. Department of Education, through regulations implementing the laws Congress has passed, have established a set of federal requirements focused on proper stewardship of taxpayer dollars." CSWE strongly supports this division of responsibilities as it relates to higher education. Additionally, the distinction between institutional accreditors and programmatic accreditors is an important one. CSWE supports legislative language within the *Higher Education Act* (HEA) that would assure that programmatic accreditors are exempt from federal regulations as they relate to accreditation. While the white paper considers the usefulness of Cohort Default Rates, the 90/10 rule, and the gainful employment rule as accountability requirements, CSWE will direct its comments to the white paper's treatment of the federal loan program and proposals around evaluating individual programs of study.

The white paper notes that reauthorization of the Higher Education Act (HEA) presents an opportunity for policymakers to rethink aspects of the federal student loan program. CSWE agrees with the Chairman's commitment to responsibly using tax-payer dollars. CSWE also agrees with the white paper's observation that, "Support for federal loans to students in the name of access remains an important priority..." CSWE is concerned, however, that there are proposals to eliminate loan forgiveness as part of Income-Based Repayment (IBR) programs and the Public Service Loan Forgiveness (PSLF) program being considered. Social workers fulfill critical positions in many sectors including health, mental health, education, child welfare, aging, and others. Many of these positions entail working with vulnerable populations like veterans, victims of the opioid crisis, children, and others. These positions are often in the public sector, where compensation often lags private sector compensation. Loan forgiveness and programs like PSLF are benefits that can help account for these differences in compensation. Eliminating these benefits will only exacerbate current workforce pipeline challenges and discourage students and individuals from pursuing the social work profession.



CSWE would also encourage the committee to consider the implications of setting accountability standards at a program level. Important considerations should be the potential burden on institutions and programs to collect information like earnings. CSWE agrees with the white paper's assertion that, "Accreditors, as another leg of the triad, are responsible for determining acceptable indicators of quality and student learning." CSWE takes its responsibility of preparing a professional workforce seriously. As such, CSWE is best suited to ensure entry-level competency of graduates for professional practice by collecting meaningful profession-appropriate outcomes measures. CSWE believes that with input from the public and the professional workforce, specialized accreditors have the unique ability to set and assess quality measures within diverse institutions and regional environments, taking into account market and resource needs. Types of outcome measures specialized accreditors might consider have a broad range, including licensure pass rates, externship evaluations, community-based projects and juried performances. Solely focusing on loan repayment rates by a program's graduates could overlook these important outcomes.

CSWE would also like to share its principles for a HEA reauthorization and offers itself as a resource as the committee conducts the reauthorization process.

Principles for Ensuring Accessible and Affordable Higher Education

As policymakers consider making reforms to the HEA, CSWE supports the following principles that support its mission:

- ***Allow Accreditors to Focus on Educational Quality and Removing Barriers that Inhibit Quality.*** The federal government has long relied on accreditors to assure the quality of higher education. The role of the federal government has been to enforce the rules and regulations related to student aid. CSWE strongly supports this division and encourages higher education legislation to continue this practice. Because institutional accreditors are responsible for ensuring federal funds are going to quality institutions, it is reasonable to have federal oversight of this process. Most programmatic accreditors, however, do not have a role in determining if an institution is eligible to participate in the federal student aid programs under the HEA. CSWE supports legislative language within HEA that would assure that programmatic accreditors are exempt from federal regulations as they relate to accreditation. This will allow CSWE to focus on ensuring the highest professional standards, leaves control to the academic accrediting community, and accounts for institutional diversity.
- ***Protect the Public Service Loan Forgiveness (PSLF) Program:*** The PSLF program was created in 2007 to encourage students to pursue public service careers. Eligible public service employees include teachers, police officers, firefighters, social workers and nurses, among a variety of other professions. To qualify for forgiveness under PSLF, borrowers who enter full-time employment at qualifying public service organizations must make 120 on-time monthly payments—which total 10 years of payments—while enrolled in a qualified repayment plan.

Additionally, for professions like social work, where wages are often lower when compared to other professions, PSLF encourages professionals to pursue opportunities in critical high-needs areas. Social workers provide invaluable service, very often public service, to society.



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Recognizing this service through programs like PSLF, will allow more students to pursue the profession, and allow them to achieve important financial milestones in their own lives.

- ***Recognize the Important Role of Graduate Education:*** Graduate education is vital to professions that serve communities throughout the U.S. including social work. A master's degree in social work (MSW) is required for areas of specialized practice (such as behavioral health and substance abuse). Efforts to make graduate education more expensive, such as eliminating graduate student eligibility for Federal Work Study funds, and the elimination Grad PLUS loans, will force students to take out private loans or make it so only wealthy students can pursue graduate education. Additionally, in light of the continuing demand for social workers to assist with mental health and substance abuse, and aging populations, social work programs should be designated for inclusion in the Graduate Assistance in Areas of National Need (GAANN) program.
- ***Higher Education Must be Accessible and Affordable:*** The need for postsecondary education in today's economy is undeniable. Increasing costs, however, make that a difficult reality for many students. Policies like loan forgiveness as part of income-based repayment plans, programs like Federal Supplemental Educational Opportunity Grants, and other student aid programs help increase access for low-income students. CSWE supports indexing the maximum Pell Grant to inflation.
- ***Ensure Efforts to Address Campus Sexual Assault are Effective:*** The continued attention to sexual harassment in the workplace parallels the issues campuses have long had with campus sexual assault. CSWE firmly believes students and vulnerable populations should be protected and believes that social workers as professionals are often equipped to provide support in this area. Higher education legislation should ensure that students have access to trained professionals like social workers and psychologists when addressing the issue of sexual assault on campus.
- ***Acknowledge the Intersection of Professional Competencies and Institutional Mission:*** A strength of the higher education system in the U.S. is the diversity of its institutions. Social work requires the ability to engage diversity and difference. This can lead to instances where institutional mission can conflict with professional competencies. CSWE supports higher education policies that recognize that institutional mission should not trump professional competencies, especially as it relates to programmatic accreditation.