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Draft 1 Feedback Summary

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COUNCIL ON SOCIAL WORK EDUCATION

*Commission on Accreditation
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Introduction

In April 2021, the Commission on Educational Policy (COEP) and Commission on Accreditation (COA) released the first draft of the 2022 Educational Policy and Accreditation Standards (EPAS). The draft was accompanied by a feedback survey that outlined the proposed changes and solicited feedback from CSWE constituents. The feedback survey closed on May 18, 2021, with 564 responses from social work educators, organizations, administrators, practitioners, and stakeholders from across the United States. In addition to the feedback survey, COEP and COA presented on the draft and solicited feedback in the following forums:

- The Association of Baccalaureate Social Work Program Directors spring 2021 conference
- The National Association of Deans and Directors of Schools of Social Work spring 2021 conference
- The CSWE Council on Field Education Town Hall

There were 233 fully complete responses to the EPAS 2022 draft 1 survey, although 564 respondents answered at least one question on the survey. Of those who responded to this survey and attended the feedback session, there is overwhelming support for the proposed changes in this first draft. The major themes that emerged concerned prescriptive standards and anti-racism.

- Prescriptive standards and workload concerns: Feedback related to the prescriptive standards appear to be connected to program size or context. For instance, larger programs tended to be in support of prescriptive standards related to faculty ratios and faculty minimums. They reported using those more prescriptive standards to advocate for program resources within their institutions. On the other hand, smaller programs tended to be in support of this draft's more flexible standards related to faculty ratios and faculty minimums. The smaller programs reported the more flexible standards to be more supportive of the financial contexts of programs with fewer resources than larger programs.
- Anti-racism: There is a need for additional education on the meaning of an anti-racist perspective or lens. Our members perceive this perspective to be theory, with some believing an anti-racist perspective to be a proxy for critical race theory. Furthermore, there is a need for additional education on why it is important for social workers to be anti-racist. Although a small number of responses reflect a rejection of anti-racism, there are enough comments about anti-racism (for and against) that suggests the need for clarity about this perspective and why it needs to be specifically identified whereas sexism, ageism, and other forms of discrimination are not identified beyond having a definition in the glossary.

Feedback letters were also collected through the survey from numerous programs, organizations, and groups.

The following data reflect the responses to each of the survey's 22 sections.

Summary

Purpose

Respondents were asked to state their level of agreement with the entire purpose statement on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 8.24, reflecting an agreement with the purpose statement.

Comments about the “Purpose” section focused largely on the following areas:

- The impact on social work in general: There were overwhelmingly positive responses on the language in the “Purpose” section and its reflection on the direction of the profession through social work education. Comments include the following:
 - *I value the language and professionalism. It celebrates the social work perspective.*
 - *It's excellent. As someone who represents a religiously affiliated institution and identifies as a Christian, I wholeheartedly support the purpose as stated in this section. Our program is very supportive of the revisions in wording.*
 - *Also, is it not understood that social workers are to engage in anti-racist social work practice?*
- The use of specific theories (e.g., critical race theory): Some respondents incorrectly perceived that the “Purpose” section was focused on particular theories of anti-racism and critical race theory. Comments include the following:
 - *Some of the language used within the first paragraph of the purpose section seems to use language that is focused on a particular theory.*
 - *The purpose section specifically references “Anti-Racism” which implies reference to a specific theory and approach as opposed to the value of being against racism.*
 - *As also stated in the purpose section, evidence informed practice is important and anti-racist theory is not currently well supported by research as demonstrating evidence of positive outcomes.*
 - *To specify critical race theory might actually obfuscate how we strive for a newly mandated anti-racist direction.*
 - *We would support statements denouncing racism and inclusion of a goal to eliminate it in all its forms, but not references to anti-racism or an anti-racist lens, practice, etc. as these imply or reference a specific theory and suggest that only this model can be used to accomplish the goal.*
- The reference to policy practice and levels: Respondents support the reference to policy practice in the “Purpose” section, although some expressed concern that there is too much of an emphasis on policy practice. Comments include the following:
 - *I appreciate the inclusion of intentionally elevating the policy component.*
 - *I worry that the language about social policy practitioners will seem to indicate a separate group or separate kind of action, rather than policy practice as an essential activity of all social workers.*

- Anti-racism: The Likert-scale responses averaging 8.24 out of 10 indicate that respondents overwhelmingly support the use of anti-racism to reflect who we aspire to be, but there is some misunderstanding of what this means or implies, and a small minority of respondents disagreed with the addition. Comments include the following:
 - *To consistently state social workers must engage in anti-racist practice seems to imply that social workers have not been engaged in such practice in the past and present.*
 - *We must unify around anti-racism, as this EPAS largely does, not get into debates about the centrality of CRT that will diminish the groundswell of support for moving EPAS in an anti-racist direction.*
 - *Focus on “evidence informed” and not practice informed is problematic and contradictory to new stated anti-racist mission.*
 - *I like the addition of the ADEI [anti-racism, diversity, equity, and inclusion] as well as the plan to evaluate it in Section 5.*

Competency 1: Demonstrate Ethical and Professional Behavior

Respondents were asked to state their level of agreement with Competency 1 and associated practice behaviors on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 8.53, reflecting a strong agreement with this competency.

Comments about Competency 1 focused largely on the following areas:

- Impact on social work practice and education in general: Respondents reflect an understanding of the impact of this competency on social work practice.
 - *This should also apply to faculty, staff, and administrators. I think a lot of the onus of ethical and professional behavior tends to fall on students, which lets many faculty, staff, and administrators off the hook. They need to be held accountable of this too, especially since ADEI is infused throughout this draft.*
 - *Greatly appreciate the addition of historical oppression and recognizing and managing personal values.*
 - *We would like to know more about how the student demonstrates competency in managing affective reactions.*
 - *Only concern is the behaviors: As social work profession the evidence reflects a need for emphasis on reflection and self-regulation as well as professionalism; this behavior was eliminated but is one that is critical to ethical practice.*
 - *Glad to see “Social workers also understand the role of other professionals when engaged in interprofessional practice” also included in this section. IPE [interprofessional education] is being strengthened in other professions’ accreditation documents and I’m glad it is for us too.*

- Impact on professional social work values: Respondents raised questions about the impact of this competency on our professional values.
 - *The Competency mentions an anti-racist perspective, and then imposes a racist worldview. “Demonstrate professional demeanor in behavior; appearance; and oral, written, and electronic communication” is white supremacist? It reinforces so-called standard American English and prioritizes that over other valid forms of communication. Mostly white faculty impose these standards on students—this rises above the level of microaggression. This asks students to constantly code switch, which itself is a form of harm. If a student does not code switch appropriately they are deemed unprofessional. I don’t think this is the intention, but it is certainly how this is applied but faculty who “treat everyone the same”—i.e., are colorblind.*
 - *Good addition of managing biases AND REACTIONS.*
 - *I oppose the implication that we should actually teach social media skills as anything more than a technique, a tool, that may or may not be used depending on the practice setting.*
 - *I agree with the changes; the affective reactions to conflict management feels especially important.*
- Anti-racist lens and language: Although most respondents support the use of anti-racist language in the section, as evidence by the 8.53 out of 10 Likert-scale score to the section, there were comments about operationalizing this term.
 - *While it is appreciated that the wording of this section uses “anti-racist lens” for social workers to understand the profession’s history, this brings to mind the concern that other lenses are not being considered as well to look at the profession’s history, etc.*
 - *The earlier decision to propose adding the “anti-racist lens” phrase was an important sentence for beefing up the historical content overall is important.*
 - *Addition of “anti-racism” to this and other standards requires that schools are able to articulate what they mean by “anti-racism.”*
 - *I personally prefer the terms “critical race,” “microaggressions,” “systemic racism” as opposed to anti-racism.*

Competency 2: Engage Anti-Racism, Diversity, Equity, and Inclusion in Practice

Respondents were asked to state their level of agreement with Competency 2 and associated practice behaviors on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 8.13, reflecting an agreement with this competency.

Comments about Competency 2 focused largely on the following areas:

- Various status delineations: This competency evoked strong reactions to the perception that a specific theory is required in this document. Furthermore, respondents believed that a focus on anti-racism negates other areas of oppression.

- *Good additions! Would value historical trauma being added to the conversation. Would value reference to all harmful isms, such as sexism, ageism, and so on. Would especially value adding sexism—as human trafficking, sexual assaults, rape, domestic violence, sexual harassment, unfair employment practices, and the list goes on—are all harming all women, families, generations, and so on.*
 - *If we are adding racism, oppression and white supremacy—should we not add other “isms”—such as class and gender, etc.? Our students see oppression and discrimination in many different sub groups in field and practice.*
 - *The language used in this section seems to closely align with one particular theory (CRT). While this is one theory to use to discuss this area, it is not the only one just as racism is not the only issue surrounding diversity, equity, and inclusion.*
 - *Speaking as a lifelong anti-racist activist, I oppose the two insertions regarding critical race theory.*
 - *If we are going to require that we teach critical race theory, CSWE should provide online training to all faculty on critical race theory. Not all faculty are familiar with the current teachings in this area.*
- **Impact on social work education (didactic and field):**
 - *How will social work faculty, staff, and administrators be held accountable for their own microaggressions, lack of diversity at historically White institutions, and limited teachings about racism, diversity, equity and inclusion?*
 - *I appreciate the support of CSWE to move us forward in a place where social work programs can participate through policy in changes happening throughout our country.*
 - *This seems to be pandering to the left and training social workers to be radical advocates instead of compassionate and tenacious social work practitioners whose goal is to help everyone be the best that they can be.*
 - *Are there really enough social work faculty to teach anti-racist practice and teach it well?*
 - *I like the additions to this competency. I do worry about losing field sites because of the strong language of anti-racist practices. I also wonder if there could be more specific behaviors here? It is vague and difficult to conceive how students could measure anti-racist behavior in all of the metrics noted. . . . This may also have implications for field placements based on their scope of practice, but I am in agreement with the sentiment, goals & clear anti-racist language.*
 - *Strongly support the change in title and the specific terms added such as white supremacy, noting generational status, privilege and power. Note strength of emphasizing the fact that persons are the experts of their own experiences. We are supportive of this language. What plans are there to consider how students will measure anti-racist behavior on all of the metrics noted?*
 - **Language (e.g., cultural humility, white supremacy, white privilege, anti-racism), primarily in favor of the additions, but also with some concerns. There were also several comments asking for additional definitions in the text (e.g., minimal compliance, generational status, systemic racism).**
 - *Love the inclusion of cultural humility and fully support this shift from “cultural competence.” Also really like the revision to include anti-racism and to call out white supremacy. However, trainings and*

attention to how white supremacy shows up in social work education, practice, and within ourselves is important. (Don't want to band-aid curriculum or practice, but elevate that deeper work.)

- *Using "white supremacy/superiority" seems inflammatory. White privilege is acknowledged. "Demonstrate anti-racist social work practice." Is this promoting a theory or dictating a singular method of practice? Could anti-oppressive social work practice be considered?*
- *We appreciate both the language of anti-racist social work and cultural humility.*
- *Again, I support the use of "critical race" language but also think we should be inclusive of concepts such as "decolonization" and "non-Western-based" thinking.*
- *Especially happy to see "tribal sovereign status" included.*

Competency 3: Advance Human Rights and Social, Racial, Economic, and Environmental Justice

Respondents were asked to state their level of agreement with Competency 3 and associated practice behaviors on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 8.36, reflecting an agreement with this competency, which was also supported by open-ended comments.

Respondents asked for the definition of structural racism, cultural humility, social goods, and anti-racism, as well as examples of how to assess and measure student's progress with the competency.

Comments about Competency 3 focused largely on the following areas:

- Justice, social justice, financial justice, intersectionality of subjects
 - *In economic justice, I think there needs to be a clear focus on discussing and measuring financial capability of clients.*
 - *Although finance is part of economics, it is a critical aspect of social work knowledge and action, and includes financial decisions, activities, and opportunities. For example, finance includes people's ability and right to have access to financial guidance, planning, consumption, transactions, wealth building, debt management, and protection. The importance of both economic and financial is illustrated by the selection of "Reduce Extreme Economic Inequality" and "Financial Capability and Asset Building for All" as two separate Grand Challenges for Social Work.*
 - *There's new consensus among international social work scholars that the term "ecological justice" is preferred to "environmental justice" because it is more inclusive and places the ecosystem rather than one particular species at the center of the struggle for justice.*
 - *While some may be concerned about the term "ecological justice" erases the work of Black-led environmental justice movements, if we are adding racial justice and anti-racism as values in the EPAS, this should make clear the priorities of social work.*
 - *Appreciating the focus on anti-racism, we would like to see an additional bullet that addresses intersectionality, as it is not addressed there and is key to SW practice that embraces diversity, equity and inclusion as noted in the competency 3 description. Critical to add democracy, voter and civic engagement throughout.*

- Rights based principles
 - *Must keep “right-based principles.” This is essential. Just referencing “justice and human rights” does not go far enough, nor guide education a how to achieve these. Rights-based principles is much stronger.*
 - *Given the ongoing oppression of First Nations people, and the racism directed at them, the fundamental human right to culture should be included.*
 - *... the fundamental right to peace and to a clean environment*

- Social work education
 - *Competencies 2 and 3 have become harder to distinguish in some areas now. This competency is a very heavy lift—especially for a generalist curriculum: to be required to educate about global and national aspects of these issues and civil, political, environmental, economic, social, and cultural human rights just scratches the surface and doesn’t lead to competence in any one respect.*
 - *I like the added language here. I do worry again about demonstrating competence in the behaviors of dismantling structural racism. It is what they should be working towards, but that is a big ask to demonstrate evidence in it. Glad to see the emphasis on history noted here.*

Competency 4: Engage Practice-informed Research and Research-informed Practice

Respondents were asked to state their level of agreement with Competency 4 and associated practice behaviors on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 8.10, reflecting an agreement with this competency, which was also supported by open-ended comments.

Comments about Competency 4 focused largely on the following areas:

- Research methods and pedagogies: Respondents focused on the implementation of practice behaviors related to how research is taught in the classroom and practiced in the field.
 - *Like the clearer distinction between 4 and 9 and the emphasis of distinguishing between master’s and doctoral students.*
 - *I know some of our field supervisors have a problem with this one because they say their agencies do not do research. Is there a way to make it real for them?*
 - *The availability of published research bringing anti-racist and culturally informed approaches will need to be intentionally encouraged and cultivated in order for the professional to truly demonstrate competency with these additions. Further clinical and macro/policy focused research needs to be conducted to inform the profession, otherwise, this falls flat.*
 - *These practice behaviors appear that they will be better understood by students.*
 - *Include “decolonialize research methods.”*

- *Appreciate distinction from competency 9 being made more clear. The additions make this competency more specific and clear. Appreciate that students must develop strategies but that they are not necessarily required to apply them, should this be a challenge in some field placements.*
- Anti-racist research continues to be a highlight for respondents. :
 - *While I like the anti-racist language, I wonder whether it might be insufficiently broad, what about other kinds of cultural sensitivity/humility in research, such as gender, sex, ability, age, etc.?*
 - *Can culturally sensitive or culturally competent or some other term be used as opposed to “anti-racism”? Is using anti-racism referring to a theoretical approach throughout the new EPAS?*

Competency 5: Engage in Policy Practice

Respondents were asked to state their level of agreement with Competency 5 and associated practice behaviors on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 8.31, reflecting an agreement with this competency, which was also supported by open-ended comments.

Respondents asked for definitions for *human rights*, *digital rights*, *digital citizens*, *social welfare policies*, and *anti-racism*.

Comments about Competency 5 focused largely on the following areas:

- Policy practice: Respondents were concerned with the practice behaviors associated with this competency.
 - *Have concern about how this will be achieved when it comes to ADEI.*
 - *Here seems a better fit for intersectionality (as articulated by Crenshaw). Social workers must understand and analyze the intersectionality of social policies to assess and intervene on behalf of vulnerable and oppressed groups. Use of the Poverty Aware Paradigm or anti-poverty lens for social policy analysis could be valuable in addition to Critical Race Theory and anti-racist lens.*
 - *I like the additional language and direction here. Historically, students have had the most issues meeting this competency fully due to site limitations, and I want to be mindful of the behaviors and the ways students might meet those in field. I do think an addition of anti-oppressive behaviors would be helpful to broaden the perspective and incorporate additional oppressed identity.*
 - *Behavior: While I understand the value of reducing the behaviors, the eliminated bullet point is an area where our program advisory committee (made up of community agency representatives) has outlined as a critical demonstration of skill and is reflective of the context of the placement and communities.*
 - *This is clearer for students and for programs to evaluate.*
 - *It's a breath of fresh air to see policy practice inclusive of global influences and human rights-based efforts!*
 - *As shared previously, we are moving to the forefront of what social work means in today's world. The impact of covid and racially charged oppression. It helps to know we are supported in our curriculum and field designs addressing these issues through social work education.*

- Anti-racist language continues to be of concern to some respondents (for and against).
 - *Using an “anti-racist” lens is only one way to address multi-systemic problems in our society. Advocating for a variety of causes and populations is needed, rather than only viewing problems through the lens of “anti-racism.” The overt focus on “anti-racism” does not take into account multiple aspects of one’s identity.*
 - *This seems [too] narrow of a scope for policy analysis as one should be addressing more than racism.*
 - *Similar criticism, is the anti-racist lens the only through which critical thinkers can evaluate policy and practice? Are we being too narrow?*
 - *The term anti-racist is not included but the focus rightly includes race. The balance is better in this competency.*

Competency 6: Engage with Individuals, Families, Groups, Organizations, and Communities

Respondents were asked to state their level of agreement with Competency 6 and associated practice behaviors on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 8.72, reflecting a strong agreement with this competency, which was also supported by open-ended comments.

Respondents asked for the definition of *environment* in *person-in-environment*, *reflexive*, *bias*, and *principles of interprofessional collaboration*.

Comments about Competency 6 focused more on wordsmithing. However, here are some of the comments reflective of general sentiments toward this competency:

- *I think continuing education/professional development needs to require systemic racism training and implicit or unconscious bias.*
- *Love that interprofessional collaboration has been added here; time to make the needed shift from not just interprofessional education but include practice activities as well.*
- *In the description of the competency: Reflexive is a term which tends to be confused with reflective.*
- *This is stronger than previous language and more precise.*
- *I am not sure I like the word “self-determination” here as this is a value and it seems like this is a practice section that should imply a more active process—“collaborate with clients and constituents by respecting their voices in developing mutually agreed-on goals in the assessment process.”*

Competency 7: Assess Individuals, Families, Groups, Organizations, and Communities

Respondents were asked to state their level of agreement with Competency 7 and associated practice behaviors on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 8.71, reflecting a strong agreement with this competency, which was also supported by open-ended comments.

Respondents asked for the following terms to be defined: *reflexive, person-in-environment, culturally responsive assessments*.

Comments on Competency 7 focused more on wordsmithing and asking for examples. Comments focused on content include the following:

- *Language is more precise and improved. The language about multiple theoretical frameworks is broader and more inclusive than the narrower anti-racist language that lacks sufficient breadth to reflect the vast panoply of oppressive and supremacist lenses.*
- *Extremely important language.*
- *I am happy to see person in environment added as well as the theoretical frameworks.*
- *I appreciate the emphasis on collaboration and self determination.*
- *Delete very harmful and divisive power/privilege.*

Competency 8: Intervene with Individuals, Families, Groups, Organizations, and Communities

Respondents were asked to state their level of agreement with Competency 8 and associated practice behaviors on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 8.67, reflecting a strong agreement with this competency.

Again, most of the comments were related to wordsmithing. However, there were comments focused on the following themes:

- Interprofessional collaboration and practice
 - *I believe they should be added back in: use inter-professional collaboration as appropriate to achieve beneficial practice outcomes; and facilitate effective transitions and endings that advance mutually agreed on goals.*
 - *There is good evidence that IPC can and does improve client outcomes so I might add a specific behavior here: "Utilize interprofessional collaboration as an evidence-informed intervention to achieve client and constituent goals."*
- Intervention processes including terminations and endings
 - *Propose to restore this practice behavior from 2015: Facilitate effective transitions and endings that advance mutually agreed on goals.*
 - *Appreciate emphasis on contracting process.*
 - *Would like to see language on identifying and processing termination/endings.*
 - *I really like how the practice behaviors have been made more concise for this competency.*
 - *These changes will help provide clarity specifically to the field agencies we work with.*

Competency 9: Evaluate Practice with Individuals, Families, Groups, Organizations, and Communities

Respondents were asked to state their level of agreement with Competency 9 and associated practice behaviors on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 8.49, reflecting an agreement with this competency.

Most of the comments were wordsmithing suggestions; however, the following themes were identified:

- Theoretical perspectives as a lens for evaluation
 - *... I would suggest having one more practice behavior which reflects this. How about: Evaluate progress towards the reduction of unjust inequities stemming from the chosen intervention.*
 - *Again, not sure why anti-racist perspective is needed on this competency when it has been added to several others.*
 - *Good definitions.*
- Impact on field experiences including difficulty in providing opportunities at all client levels
 - *Support additional language. I note that it may be difficult for some field placements to provide opportunity for engagement with all entities noted (individuals through communities). I support this language but foresee challenges with this in the field based on variation in scope of agencies.*
 - *This will support clarity when training agencies on field practicum expectations.*
 - *The competency should not be solely on understanding qual and quant methods for evaluating, but more on being able to DO these things. Coming out of the MSW program with the demonstrated skill at being ABLE to DO program or practice evaluations.*

Educational Policy 1.0: Program Mission

Respondents were asked to state their level of agreement with the entire “Program Mission” section on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 7.99, reflecting an agreement with this competency.

Respondents asked for a definition of the following terms: *anti-racist perspective, environmental justice*.

The following themes emerged among the comments:

- Mission alignment: Respondents were concerned with whether programs should document how their mission aligns with the institutional mission.
 - *Still think it is important to align the program's mission to the institution. However, agree that it does not need to be so.*
 - *The concern with this standard is about the removal of program mission and institutional mission alignment especially as it relates to programs at faith-based institutions.*
 - *Is ADEI expected to be in the program's mission?*

- *We appreciate the attention to the program's mission more than spending too much time describing the institution's mission.*
 - *Removing the connection to the institutional mission is a significant change and one that has potentially problematic consequences. Programs exist in the context of institutions and need to be aligned with those missions. Diversity applies to institutions as well as individuals and groups, which needs to be recognized in the accreditation process. To fully understand and appreciate the program mission, one needs to understand the institutional mission. Some are research-based, others are teaching institutions. Some are land-grant institutions, or ethically based missions. Some are faith-based.*
 - *I do believe that the mission needs to tie with profession; however, the mission needs to still be connected to the institution overall.*
 - *I think there is danger in divorcing the program's mission from the institutional context, especially for schools with a specific focus (such as geography, faith, etc.).*
 - *The mission aspects are clearer for programs to explain in the documents.*
 - *Not understanding rationale for removing institutional & program context. SW programs do not operate independently from institutions. If you do not tie program to context, institutions will start making a case to not have SW programs especially in schools with a strong mission like faith-based schools. This seems to be an attempt to devalue these type of schools for social work education which would be unfortunate.*
 - *I agree with the mission particularly as it relates to the social work profession and department; however, this could be challenging for some programs to fully embrace and engage in particularly as some institutions do not take a social justice/anti-racist stance. Particularly for some religious institutions, there are difficulties in acknowledging these paradigms.*
 - *I believe the elimination of the link between program mission and institutional mission will allow institutions with a biased or prejudiced focus to offer social work programs. The link between institutional mission and program mission at least makes programs justify how they can operate in such an environment.*
 - *I like the changes in the mission around removing the requirement that it must be connected to the institutional mission.*
 - *There should still be some level of consistency between Institutional and Program mission—otherwise why is a social work program situated within an institution that does not align with the profession?*
- Program context
 - *Disagree with the removal of context from the mission. I think understanding context is important. As a site visitor, I have been impressed with the ways programs have adapted to meet the needs of their unique context, and it does and should inform the curriculum.*
 - *I am dismayed to see the context go away. As a site visitor, this has always been an important part of seeing how the program is able to take the professional mission and translate it to their local*

area. It has always allowed programs to articulate who they are in a deeper and more meaningful way. It's easy to say you fulfill the mission and values of the profession, but it is in the rich ways that it is applied to unique contexts where you can really see how the rubber meets the road. I don't recall hearing why this decision was made so I don't know the rationale.

- ADEI and other isms: Respondents were concerned with the use of ADEI language and the perception of attention on other isms.
 - *I am also concerned that we have not mentioned enough other vulnerable populations (differently-abled, gender and sexual orientation, age, religion).*
 - *Too much focus on anti-racism, which excluded other forms of oppression; anti-racism requires a definition.*
 - *Good additions! Would value reference to all harmful isms, such as sexism, ageism, and so on.*
 - *I think there is a lot more to social work than the anti-racist position. I think we should tone down this type of discussion. While ADEI is very important, I don't think it should be the center of the explicit and implicit curriculum. Right now social work is considered one of the most important helping professions. To continue this radical move toward the left will alienate half of our colleagues and half of the communities with whom we work. I think we should tone down the emphasis. Too much will only defeat our purpose.*
- Overall comments on this section:
 - *Service, social justice, the dignity and worth of the person, the importance of human relationships, integrity, competence, human rights, and scientific inquiry are among the core values of social work. These values, along with an anti-racist perspective, underpin the explicit and implicit curriculum and frame the profession's commitment to respect all people and the quest for social, racial and economic, and environmental justice. As previously stated, it is unethical for CSWE to mandate the use of a particular theory as the sole perspective for social workers. We would recommend the statement be eliminated or revised as follows to better reflect the values described in the code of ethics: "These values, along with an understanding of the importance of diversity, oppression and marginalization, underpin the explicit and implicit curriculum and frame the profession's commitment to respect all people and the quest for social, racial and economic, and environmental justice."*
 - *I appreciate the clarifications that the newly written AS 1.01-1.03 provide. As an MSW Program director within a large institution, the multiple levels of consistency that the previous standards outlined as needing to be demonstrated felt confusing and excessive.*
 - *I think having the program goals included is important as it ties into the explicit and implicit curriculum.*
 - *I appreciate CSWE's direction to move our programs to current issues and concerns in the world today.*

Educational Policy 2.0: Anti-racism, Diversity, Equity, and Inclusion (ADEI)

Respondents were asked to state their level of agreement with the entire ADEI section on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 8.01, reflecting an agreement with this competency.

The following themes emerged among the comments:

- Perception of a mandated theory
 - *The proposed EPAS 2022 draft standards and competencies imply the mandating of a particular ideology or theory (antiracism and underlying critical race theory) above and beyond the concepts, principles, standards and values described within the code of ethics. This approach of requiring a specific theory as well as several aspects of the proposed theory violates the code of ethics.*
 - *It is not that there is disagreement about the underlying values that the language may be trying to promote—there is full agreement with that, however, the “ADEI” language used is too closely tied to one theory (Critical Race Theory), that, while is an important one to present, is not the only theory to be discussed or used to address issues of racial, social, economic, or environmental justice or inequalities that exist in our society today.*
 - *There is no disagreement regarding the importance of anti-racism, diversity, equity and inclusion. However, the way this is being presented seems very closely tied to CRT which is only one perspective on these issues.*
 - *Anti-racism as a term, is almost exclusively used within the context of Critical Race Theory (CRT). By including Anti-racism with the other terms (Diversity, Equity, Inclusion), the message is that CRT will be required to take the lead in all areas (implicit and explicit) within our social work program. CRT is a very controversial theory and approach to diversity and is currently being contested and even banned in several states across our nation. Any institution within one of these states where it is banned would not be able to comply with these new EPAS standards as written. ADEI, if connected and contextualized within CRT, will be a strong area of discord and even possible litigation in the future. I would strongly recommend removing the term anti-racism from the proposed 2022 standards, or, define anti-racism specifically if the intention is not to connect it with CRT and the wider philosophy that CRT embraces.*
- Assessment
 - *1. Many programs may continue to do “minimal compliance.” . . . some programs would do minimal, and is that what we want programs to do. 2. How is anti-racism being defined? Who will be responsible for defining it? Is it feasible to be and realistic to have a universal definition that ALL programs are to follow? . . . 3. There are different types of racism (e.g., anti-Black racism). Therefore, are BSW, MSW, and now DSW programs be expected to cover all types of racism? If so, how will that be done and will it be effective? 4. How will social work faculty, staff, and administrators be held accountable for their own microaggressions, lack of diversity at historically White institutions, and limited teachings about racism, diversity, equity, and inclusion? 5. The profession has to reckon with the historical and current pain many social workers have caused for*

certain groups. 6. Merely having readings from those of the global majority is NOT enough and just saying, "I am anti-racist," "I want to be anti-racist," and/or "I want our programs to be anti-racist." 7. Faculty, staff, administrators, and field supervisors must have consistent training and professional development about ADEI. 8. How will COA ensure programs are following through with what is required for competency 2 before submitting a self-study or benchmark document?

- How many examples? For the explicit curriculum, do examples have to be provided for all sequences (e.g., policy, HBSE, etc.)? How about for the implicit curriculum?
- I realize there is an effort to change the ADEI section by including Critical Race Theory. I fully support Anti-racism and Diversity and Inclusion language. I DO NOT support inserting "Critical Race Theory" language. The point is to affect change in curriculum (implicit and explicit) and I believe Anti-racism and D & I do precisely THAT. I believe stating one specific theory is limiting. Also, it is divisive in today's political climate. The theory has be "politicized" by both parties in the US. CSWE SHOULD emphasize Anti-racism language, but not require one specific theory to address it.
- I agree with the intent of the section but have concerns related to the following sentence: "The program has an inclusive approach to addressing the vast range of student learning needs, including intentional planning and implementation of inclusive practices and pedagogies in the explicit curriculum that reduce barriers while optimizing accessibility and equity for students." What is needed, and are there examples of how a program is assessed when meeting this statement?
- Does this section remove a measure of autonomy previously granted programs to choose implicit and explicit for evaluation? If a program is consistently strong in its ADEI efforts (e.g. HBCUs or HSIIs), are they not free to choose other areas for evaluation?

- Accountability

- I think these could be steps in the right direction, but I am concerned that they will allow programs to be performative, looking good on paper, but where is the accountability? How will this happen? "Faculty and administrators model anti-racist practice and respect for diversity and difference. Faculty and administrators also foster an equitable and inclusive learning environment by facilitating important ADEI discourse." . . . Also who at CSWE has the training to do these assessments? . . . In many ways, this seems like a setup for major gaslighting by these program when students, staff, and faculty bring up issues of racism. This already happens. So, where are the mechanisms for accountability?
- As a faith-based institution, we strongly support these additions. The movement to emphasize current efforts over plans will create needed accountability. Fully support the use of the term "anti-racist" and wonder if including "anti-oppressive" would ensure support for other marginalized identities/populations.
- I really appreciate this section being added to EPAS! I would like to see more accountability for social work programs by integrating ADEI throughout the explicit and implicit curriculum accreditation standards. As is, it doesn't really "show up" in the accreditation standards except under Educational Policy 2.0. I'd like to see it under Educational Policies 3.0 and 4.0, as well.

- *As a faith-based institution I strongly support these additions. They are congruent with our program and our understanding of social work practice. The move to emphasize current efforts vs. plans will create needed accountability.*
 - *I agree with this statement and support it; I am concerned about how this will be measured. Speaking for a state run institution in a rural community, despite our best efforts to attract a diverse group of faculty this is difficult (the community is mostly white and often diverse faculty indicate feeling uncomfortable within the larger community).*
- Faculty development
 - *Programs may need support in this area. Although we all are committed to social/racial justice, adding this means we actually have to change some aspects of how we work. I think some support from CSWE regarding this major focus change will be needed. Allowing many white people to be in charge of changing this, no matter how informed they are, we may be missing some vital components.*
 - *I am wondering what kind of support programs will receive in incorporating this.*
 - *Needs to include expectations about ongoing training at the faculty and administrative levels to embody these efforts.*
 - *Again, if CSWE is truly committed to these efforts, what supports are you planning to provide to the programs for them to operationalize this?*
 - *I like this as a separate section. I would like to know what training and development opportunities CSWE will provide to assist programs in meeting the standards as described for both the explicit and implicit curriculum, specifically as it relates to how to assess this component. Our university efforts are behind where we are as a department, so need additional resources outside of what our institution provides.*
- Other isms
 - *Explicitly highlighting inclusive practices with regard to ESL, neurodiversity & learning disabilities, and disability from mental health should be added. Naming these things would underscore the need to consider and adapt practices toward inclusivity. These are huge areas of lingering inequity.*
 - *I applaud the more explicit expectations about anti-racist work, however I think we should be equally vocal in our work toward the LGBTQ+ communities and religious minorities.*
 - *Incorporate “decolonizing the curriculum, syllabi and classroom and field practices.”*
 - *We are strongly in favor of the addition of 2.0 Anti-Racism, Diversity, Equity, and Inclusion. We are thrilled to see the intentional presence of anti-racist practitioners woven into the EPAS. We believe that, now more than ever, social workers need to take a more active stance on racism.*
 - *While it is terrific, the dimensions of diversity are understood as the intersectionality of multiple factors including but not limited to age, caste, class, color, culture, disability and ability, ethnicity, gender, gender identity and expression, generational status, immigration status, legal status, marital status, political ideology, race, nationality, religion/spirituality,*

sex, sexual orientation, and tribal sovereign status. I am concerned that we are parsing into different subgroups in a particular religion and this is not uniformly applied—for instance we are not subcategorizing Shia vs Sunni Muslims; or Reform, Conservative, Orthodox and Reconstructionist Jewish traditions. Yet, caste is added into the stem sentence. It would be good to focus on religion and spirituality in general. In fact religion and spirituality has only begun to be addressed in social work curriculum. This ought to be the focus as opposed to trying to accomplish too much per caste stratification etc., which may or may not have relevance in general in the American ethos, and after all EPAS is focused on US programs. Social Work profession and educational community had avoided religion due to Freudian dominance. Recognizing religious traditions beyond Judeo-Christian tradition is an important step in decolonizing social work curriculum. Therefore, engaging in within group splintering of religions could be and needs to be avoided.

- *I think we need to be more outspoken about transgender equality and LGBTQIA concerns in the standards.*
 - *Good additions! We are moving in the right direction. Would value reference to all harmful isms, such as sexism, ageism, and so on. I would like to see sexism and oppression of women added. Women are dying from domestic violence, human trafficking, and missing women (Native American women). Oppression of women impacts all women, families, generations, workforce, and society. Rape, sexual assault, sexual harassment, lack of reproductive rights, unfair employment practices, and the list goes on . . . should be a focus in EPAS 2022 too.*
 - *Please include more emphasis regarding gender inequality/sexism. I am shocked that it is barely mentioned. We are a profession which still mainly employs women. In addition, over half of our world population are women, as are most of our clients. This should be as strongly emphasized as race. One is no more important than another.*
 - *Adding ADEI as a new section in the Educational Policy emphasizes the importance of addressing the major isms pervasive in our society. Including ADEI as a standard elevates the role that the social work profession has regarding fighting against oppressive structures and systems.*
 - *I do not think Anti-racist fully captures the intersectionality of oppressive forces that social workers need to address.*
- **General comments**
 - *Really like the inclusion of cultural humility—agree with the attention to dismantle racism and would also love to see more than one system of oppression highlighted to dismantle as a profession.*
 - *Kudos to adding an explicit EP [Educational Policy] on ADEI! Second sentence for the EP: “Programs provide the context through which students learn about their positionality, power, privilege, and difference, and develop a commitment to dismantling systems of oppression, such as racism, that affect diverse populations.” Suggestion to add “. . . about their positionality, oppression, power.” We all need to learn and be aware of not only our positionality and power, but how they also intersect with oppression both at the interpersonal and systemic levels.*

- *I very much appreciate and support the changes in language in this section and the focus on anti-racism. I would recommend CSWE take a look at how anti-racism lens can be interwoven throughout sections.*
- *This addition was well overdue.*
- *As a representative of a religiously affiliated, private, Christian institution, we are in full agreement that we support the edits to this accreditation standard. We believe this represents our values and purpose within the social work profession. One question we have is the extent to which the content in the self-study related to this section will be repetitive of competency 2 in the explicit curriculum.*
- *These changes are wonderful!!! The removal of “no longer needs to report plans to current efforts” allows programs to be more fluid and reactionary to current ADEI efforts.*
- *Questions: Social work programs integrate anti-racism, diversity, equity, and inclusion (ADEI) approaches across the curriculum (does this need to be one approach infused into every class/program or can it be different aspects of ADEI—more piecemeal?). Faculty and administrators model anti-racist practice and respect for diversity and difference. (Is there a way to hold institutions accountable for providing training on the ways to model appropriate behavior or implementation of ADEI work?) I think this is assuming that all social workers are modeling the type of behavior we want in the classroom—myself included. I am eager to expand my learning.*
- *I like the move from diversity to ADEI.*
- *I like the changes to this language. I think this is clearer than in past versions of the EPAS. I think it will be easier for programs to respond.*
- *Cultural humility is an important virtue for social workers to cultivate in conjunction with other virtues such as integrity, compassion, courage, and practical wisdom.*

Educational Policy 3.0: Explicit Curriculum

Respondents were asked to state their level of agreement with the entire “Explicit Curriculum” section on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 8.02, reflecting an agreement with this competency.

Respondents asked that the following terms be defined: *professional practice community*, *(global) positionality*, *comparative analysis*, *adult-focused learning*, *rigorous*, *digital information literacy*, and *tech-supported learning*.

The following themes emerged from the comments:

- Mandated theory
 - *The goal of competency-based education is that of the social work student demonstrating, integrating and living out the designated competencies, in essence embodying in belief, skill and behavior the stated concept. By proposing the explicit inclusion of a specific theory such as anti-racist theory, the EPAS moves beyond promoting core social work values and principles as supported by the Code of Ethics to demanding that social work programs prescribe how that value should be implemented and achieved and therefore how all social workers should practice*

regardless of the context, which contradicts the code of ethics. No one specific theory should be promoted in this way in social work education.

- Faculty development

- *As some states and . . . are pushing to ban teaching Critical Race Theory, we have to be mindful of how this language can affect schools in those states. We also have to be certain that all faculty know enough about the theory to teach it.*
- *The changes are good, but could use some more instruction/direction regarding what is meant by “integrates classroom and field.” This statement is repeated often, and for programs that use block field, we will want to make sure that this model is still acceptable. We integrate classroom into our field experience during that block semester but would not be able to integrate field into the classroom before they do field. There is service learning and volunteering but not field before the block semester.*
- *Is there a uniform understanding of the term “rigorous” in terms of outcome measures? Will programs be provided examples of such measures?*
- *I am wondering what kind of training will be provided on andragogy for programs/faculty so that this portion can be suitably implemented. I imagine this is a gap for many institutions that will need to be addressed.*

- Professional practice community

- *How will the curriculum being informed by the “professional practice community” be measured? Does this mean we have practicing adjuncts who assist us with teaching? The implications for this could vary greatly according to the institution.*
- *Like the addition of guidance from the professional practice community. CSWE and the COEP and COA need more of that to help inform EPAS (not just programs being informed by practice community, but the standards of practice education need to be sure they are remaining relevant to the practice world). Sometimes there is too much of a disconnect between the practice world and the academic world*
- *Very happy to see guidance from professional practice community added; we do this within our advisory board already but am happy to continue to do more!!*
- *How will programs work/obtain guidance with the practice community so individuals can inform programs? How will this be operationalized? This seems too broad.*
- *We ask a lot of the practice community already with their role as field instructors. I have concerns that we will be overburdening the social work professionals with additional voluntary requests. This is especially concerning in smaller communities.*
- *Fine, but how are these changes encouraging actualized efforts to engage guidance from the practice community?*

- Accountability
 - *I really appreciate this section being added to EPAS! I would like to see more accountability for social work programs by integrating ADEI throughout the explicit and implicit curriculum accreditation standards. As is, it doesn't really "show up" in the accreditation standards except under Educational Policy 2.0. I'd like to see it under Educational Policies 3.0 and 4.0, as well.*

- Interprofessional education
 - *Interprofessional education (IPE) is being required by many accrediting bodies, and by incorporating that terminology, IPE activities are more easily sold to university upper admin. Thank you!*
 - *1) Still, no explicit requirement for interprofessional education. This is a real missed opportunity. Other professions are much more explicit about this. When you aren't explicit, you make it hard for programs to get resources, as Deans and others can say that it doesn't say interprofessional education, just interdisciplinary perspectives. 2) While I agree with guidance from the professional community, I also want to point out that the professional community is quite different from the academic community—they are concerned with issues of productivity and specific intervention approaches, and while many social workers have values around social justice, there is little of that in the organizations in which they work—i.e. much less than what is in the EPAS. So I think there is quite a gap in what they think is important and what CSWE thinks.*
 - *Standards regarding interprofessional practice should be added. Within our [program name], many professions/majors are dictated by their accrediting bodies who mandate interprofessional education experiences as part of their programs. Social work should do the same. Regardless of area of practice, social work students should learn how to collaborate as part of a team and also learn/appreciate the differences among various professions they will eventually work with/among. If students are not aware of the specific skillset of other professionals or disciplines, they will not be knowledgeable enough to make proper referrals—and social workers are primary sources for referrals making. Although interprofessional practice is mentioned in the field area, it should be explicitly required in the explicit curriculum section so that it's taught in the classroom setting or at university sponsored interprofessional events.*

- General comments
 - *Loved a lot of these updates. Really like the inclusion of supporting adult learning, digital information literacy, and tech-supported learning. I wonder if there is a place in this section to highlight that high-quality social work education is not measured by the number of assignments/readings faculty offer. It seems another major takeaway over the last year that would be worth including is that burned out is not better and that faculty need to be careful in discerning the amount of readings/assignments they offer students in light of the limited human capacity each person has. To that end, I think it's worth including explicit attention to the role of professional self-care somewhere in the EPAS, highlighting that social work students need to honestly learn and be equipped to care for themselves in light of the many ways they're caring for others . . . [and] that they cannot sustainably advance the well-being of others or advance any social, racial, economic, or environmental justice issue if they're not tending to their own well-being. As social work educators,*

we should be intentionally supporting students in their efforts to protect themselves from burnout to the best of their ability.

- *Although wanting to be hopeful about ADEI being added for explicit curriculum, there is great concern. It appears to me all this ADEI stuff is reactionary to the murder of George Floyd, which is very troubling because there were many Black men and women who have been brutalized and killed in this country, and not only by police. There is 402 years of history, and now social work education wants to have a conversation. Where has social work education been? As a Black social work educator and practitioner for over 24 years, this seems like an academic exercise and at times, not real and true intention. It actually has been more hurtful than helpful, especially being at a historically White institution that lacks diversity of Black faculty and students. Think it is important for social work education to clearly understand that being Black and what happens to us is not a moment but something we have to deal with every day. With many conversations, committees I am on, and webinars I have attended, not sure many of our colleagues understand this and how important this is for our explicit curriculum.*
- *We were hoping for a change regarding the curriculum matrices, which were unwieldy in the last EPAS.*
- *I'm not sure who would "provide students with . . . affective processes."*

Educational Policy 3.1: Generalist Practice

Respondents were asked to state their level of agreement with the entire "Generalist Practice" section on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 8.24, reflecting an agreement with this competency.

Respondents asked that the following terms be defined: *professional practice community, generalist practice, civic engagement, critical race theory, political justice, and racial equity.*

The following themes emerged from the comments:

- Professional practice community
 - *How is the requirement that the curriculum be "informed by the professional practice community" operationalized?*
 - *Some social work programs are pretty out of touch with what is actually happening in the "practice community." This standard needs to go beyond "input" to require more community involvement in developing their curriculum.*
 - *How will programs be accountable for community practitioner involvement? Will field instruction suffice for this?*
 - *Who is the professional practice community, and what segment of that community is sufficiently adequate to inform the curriculum? Social workers in a geographical region? Social workers ascribing to a certain set of criteria (clinical, macro, faith, rural, etc.)?*
 - *I find this to be a positive change to include practice community input.*
 - *Local practice community voices are critical.*

- *Disagree with program being informed by practice community. Rationale for this is not clear.*
- *Again, like that program should be informed by professional practice community. But is EPAS informed by professional practice community? It should be.*
- *It is important to include and incorporate feedback from the professional practice community. This may help to streamline the integration of bridging theory to practice.*
- Faculty development
 - *Hopefully tools will be made available to give ideas on what counts to show curriculum is informed by the professional practice community.*
 - *What kind of guidance is going to be given to interpret the policy around programs describe how their curriculum is informed by the professional practice community?*
- General comments
 - *“Professional” is a very problematic term. Its roots are in white supremacy, and it typically is used to mean white standards.*
 - *Our college is Urban-Engaged. With that in mind, we are truly able to re-define how we look at that through these changes and our involvement in the community.*
 - *Important to ensure a balance of macro and micro content in classroom an field. Many generalist faculty and students report an imbalance—too much micro/clinical.*

Educational Policy M3.2: Specialized Practice

Respondents were asked to state their level of agreement with the entire “Specialized Practice” section on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 8.17, reflecting an agreement with this competency.

Respondents asked questions about the definition of professional practice community. Because that is addressed in the previous EP, it was omitted here. The following themes emerged from the comments:

- Competencies
 - *Specialized areas should include all 9 competencies. The foundation curriculum requirements does just that, provides a foundation. Students still need the advanced learning and application of all 9 competencies in specialized areas. Taking these out is a significant mistake and weakens the education experience and competency of graduates.*
 - *Need to let programs advance curriculum and competencies as they see fit—not just by specializations.*
 - *Extending the competencies should apply to all of the competencies. Something different should be happening in the specialization curriculum that is more advanced for all of the competencies, not just 6–9.*

- *Please provide clarification that specialized practice “level” classes should still relate to Competencies 1–5, even though the Specialized Practice curriculum, specifically, just needs to focus on 6–9.*
- *Comps 4 & 5 should also be extended or divided in some way. I would also like to see Interprofessional Education (IPE) emphasized here as an important component of practice.*
- *Does that mean programs only need specialized competencies for 6–9 and not for 1–5?*
- *Appreciate the change that limits specialized year competencies to 6–9.*
- *Good: inclusion of professional practice community as informers of curriculum. I don’t understand what this actually means we are supposed to be doing: “The program provides its extended and enhanced Social Work Competencies including 6, 7, 8, and 9 and any additional competencies developed by the program for each area of specialized practice.”*
- *Not sure how I feel about it not including at least 2–9.*
- *Does this mean that we edit the language of these four competencies (6, 7, 8, and 9) at the MSW advanced/specialized practice practicum level and that the language of the other competencies remains the same? Or does it mean we only address these four competencies at the MSW advanced/specialized practice practicum level?*
- *I believe specialized practice areas should also extend Competencies 1–5. I know it is challenging, but each of these areas have specialized advanced content as well, i.e., specific policies, specific ethics and value applications etc. I think this waters down the specialization.*
- *I am a little unclear. Does this mean that the area of specialized practice does not address competencies 1–5? Rather, we need to come up with additional competencies as a program to address?*
- *I appreciate the focus on competencies 6–9 for specialized practice; however, how does this translate to assessment? If our specialized curriculum is focused on 6–9, then will we need to assess 1–5 in the specialized curriculum?*
- *I like the focus of extending just 6–7 in the specialized year.*
- *I strongly support that the competencies that are expended are 6, 7, 8, and 9. This allows the programs to focus on continuing to strengthen the remaining competencies rather than making up ways to extend them.*
- *I am not sure I understand why the Specialized Practice competencies 1 through 5 aren’t required to be included. Since I was not aware of this change before right this minute, I need to think about this. It seems like there is a need for specialized policy info based on the area of specialized practice. I agree that some of the other competencies may not change that much between generalist and specialized practice. I think I would need to hear more about this and how programs will be expected to do this. I do like the part about being informed by the practice community.*

- Levels of practice
 - *Good to emphasize all levels of practice related to the specialization.*
 - *Important to emphasize that whatever specialization it must be at all levels or ensure macro as well as micro learning in classroom and field.*

- Specializations
 - *We need to change the term specialized to something else.*
 - *As long as advanced generalist is still an area of specialized practice, we are ok. If it's not, then we would have major problems. Advanced gen. is the only specialization we have.*
 - *As written, it would appear the only difference between specialized and generalist is application noted in C6–9. Wouldn't specialized students have developed increased skill in policy practice or research? I am unclear (after reading the prompts below)—would the expectation be that programs could not have “advanced generalist”? When we had done an assessment of the communities around our campus, the mix of needs was so varied that advanced generalist (with a student directed area of emphasis) was the only way that any MSW program would be relevant to our region/catchment area.*
 - *If advancing MSW curriculum into specialized practice requires inclusion of the mandating of antiracist theory and practice into all levels of practice and not as a theory to teach and include alongside others, it is very problematic. We are an advanced generalist curriculum.*
 - *The definition should state that specialized practice prepares graduates to become licensed social workers, as appropriate. It is unrealistic to claim that specialized practice prepares students to “engage” in research. At best we can prepare graduates to be effective consumers of research.*
 - *Specialization language is good. It might be helpful to highlight that if there are “tracks” within specializations (CADC [Certified Alcohol & Drug Counselor], schools, etc.), assessment is on the totality of the “specialization” and not the tracks.*

Curriculum Options and Program Innovation

Respondents were asked, “What type of impact, if any, does the 2015 EPAS requirement that programs advance their MSW curriculum into areas of Specialized practice have on your program’s curriculum options or ability to innovate?” Responses ranged from 1–5, with 1 (very negative impact), 3 (no impact), and 5 (very positive impact). The average impact score was 3.41, indicating that the 2015 EPAS requirement had little impact on a program’s curriculum option or that program’s ability to innovate.

Program Resources

Respondents were asked, “What type of impact, if any, does the 2015 EPAS Specialized practice requirement have related to your program’s resources (e.g., faculty, field, course offerings)?” Responses ranged from 1–5, with 1 (very negative impact), 3 (no impact), and 5 (very positive impact). The average impact score was 3.41, indicating that the 2015 EPAS requirement had little impact on a program’s resources.

Educational Policy 3.3: Signature Pedagogy: Field Education

Respondents were asked to state their level of agreement with the entire “Field Education” section on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 8.03, reflecting an agreement with this competency.

The following themes emerged from respondent comments:

- ADEI
 - *AS 3.3.4 & 3.3.5: If the move is towards anti-racism, this standard should lay out how programs are orienting field instructors to this end, e.g., programs should describe the field education program’s process for: identifying/approving field settings and ultimately placing students in settings that embrace the program’s anti-racist lens; orienting field instructors and students to the program’s inclusion of anti-racist social work education.*
 - *Think field education has to really think about ADEI in the same way as what happens in the classroom.*
- Work-based field
 - *First of all, why go back to separate out employment from field when it has been allowed due to COVID and it is an equity issue, specifically a racial equity issue? So many students who are working class or low income do not have the luxury to do a field practicum that is unpaid. If they are fortunate enough to have a job in social work, why should it not count? We are supposedly promoting anti-racism and equity yet these standards are neither. Second, how is this going to be enforced? “It fosters a learning environment where anti-racism, diversity, equity, and inclusion are valued.” Many of these agencies are NOT anti-racist. So, similar to my feedback about social work schools all of sudden being “antiracist” when they are really not, now agencies will be too? And how will field education offices address the ones that are not? . . .*
 - *I am an Assistant Director of Field Education, and I strongly support the revision that allows greater flexibility with employer-based field experiences. Many students in our program are “non-traditional” meaning they have to work while in school or they already work in the social work field. Updating the EPAS to allow students to count their social work employment as their field experience is highly needed. This is an issue of race and class equity.*
- Administrative concerns
 - *Concern that release time of 25% may be insufficient for field instructors and program directors, even those with fewer than 100 students.*
 - *Disagreement is only in regard to Field Directors’ requirements. Other administrators may need to work in collaboration with younger or inexperienced Field Directors. The Field program’s direction, in addition to CSWE REQUIREMENTS, often requires input from program directors and faculty based on the knowledge and experience base in the [social work] program.*
 - *25% release time for the Field Director should be reconsidered.*

- Levels of practice/practice areas
 - *Should policy or social policy be another setting under 3.3.1? . . .*
 - *I fully support the notion in 3.3.1 that programs have to identify opportunities across all five levels!*

- Interprofessional education
 - *How will the requirement for interprofessional practice impact field placement availability? What further guidance will be provided for the employer-based field standard? How will the additional language for Field Education Director language impact other language about administrative loads?*
 - *How will the interprofessional practice expectation be measured in light of the limitations of some field agencies? How will the workload expectations for the Field Director/s be different with the expected increased workload?*

- In person versus simulation
 - *We support the removal of the standard specifying “in-person” contact.*
 - *Field education must include in-person contact; as the standard is currently written it seems that programs could offer field experiences based on simulation. Perhaps include language specifying a limitation on simulated experiences.*
 - *I am concerned about removing the “in-person” requirement as some programs (especially on-line) may use avatars or simulations rather than placing students in field settings/agency. Maybe the language can be that field sites must provide students the opportunity to interact with (or demonstrate skills with) real clients (or some similar language). While I appreciate the increased flexibility for placements in places of employment, I just am not totally comfortable with just allowing what their job is to count without some contingencies or conditions in place that truly make it a learning experience—maybe that the employer must be willing to allow the student opportunities outside of their usual job responsibilities as needed in order to demonstrate all the competencies and somehow wording that makes it clear that this is an educational experience*

Educational Policy 4.0: Implicit Curriculum

Respondents were asked to state their level of agreement with the entire “Implicit Curriculum” section on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 8.15, reflecting an agreement with this competency.

Respondents asked for definition of *student learning experience*.

The following themes emerged from the comments:

- ADEI
 - *How is ADEI expected to be done for implicit, when many programs have not and are “wishy washy” about doing it for explicit? Again, how is ADEI being defined?*

- *I vehemently disagree that “All elements of the implicit curriculum are expected to demonstrate the program’s commitment to ADEI.” Why is this one thing being selected as the be-all, end-all by which everything is being measured? Why not choose social justice or some other of the core social work values? And, because the word anti-racism comes first, does that mean that only anti-racism really matters? Will diversity and inclusion efforts aimed at other aspects of diversity (e.g., LGBTQ+, disability, ethnicity) count, or not? This is unclear. I agree with all other aspects of the Implicit Curriculum statement, but my disagreement with the ADEI language is so strong that I must Strongly Disagree with the entire Implicit Curriculum section.*
- Other things to consider
 - *Implicit curriculum should include the design of online course templates and/or use of LMS [learning management systems]. This structure is important in the “face” of the program and has implications for accessibility/inclusion/equity. Using design justice principles, UDL [universal design for learning] and full compliance with ADA [the Americans with Disabilities Act] is essential.*
 - *Are there any additional elements of the implicit curriculum or is it only those listed in the definition? I would add physical setting, technology access, culture of continuous quality improvement, participation of all stakeholders, historical and current context/setting, all written policies, procedures, processes, and statements, social, fiscal, environmental, ADEI responsible practices, and community partnerships, and the influence of power structures/systems in higher education and social work.*
 - *It might be good to add “Student Wellness” and “Career Development” as elements to the student learning experience.*
 - *We teach much by how we model social work competencies in our behaviors as faculty members compared to the explicit content we try to cover.*

Educational Policy 4.1: Student Development

Respondents were asked to state their level of agreement with the entire “Student Development” section on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 8.20, reflecting an agreement with this competency.

Respondents asked for the definition of *adequate resources* and *student development*.

The following themes emerged from the comments:

- ADEI
 - *ADEI requirements could be stronger throughout.*
 - *I’ve noticed that some are moving away from the “Inclusion” since it centers the dominant/White and positions diversity/equity as within that. CSWE may want to consider using more contemporary language.*
 - *I like the focus on ADEI and support for students from admission to matriculation.*

- Admissions criteria, including advanced standing and transfer students
 - *Is this saying that schools of social work cannot accept non-social work courses for transfer credit? So if a student took a graduate level Human Development course with a PSY prefix, we can no longer accept?*
 - *The redundancy between BSW curriculum and MSW curriculum is going to be hard to track if a student received their BSW from another program. I don't think this should be added. I would leave that up to individual schools to decide if they will allow a student who has already taken for example a Child Welfare course in undergrad to take the same topic again from a different professor as an MSW student.*
 - *Many programs have largely white faculty who impose admission criteria based on world views. This section needs to actively address racism and include concrete steps to make sure programs are anti-racist.*
 - *M4.1.2: Students who do not earn a 3.0 or better in a BSW degree program will not be accepted into the Advanced Standing program. They will therefore be repeating several BSW courses UNLESS they can test out of that required content. I do not agree that any BSW degree holder can be considered to have mastered the content if their GPA doesn't meet the required standards. I think they should be required to retake major BSW courses (not electives) if their grade was not a B or better.*

- Student development activities
 - *Adding licensure preparation is quite an undertaking since each state is very different.*
 - *Liked revision of standard of Advanced Standing and BSW students not repeating content in master's programs. Liked addition of preparing students for professional practice.*
 - *The sentence "recognize the need to resource student-centered activities" does not make sense, it seems there is a typo. I am unclear on what professional advising is or how it relates to a social work degree program. 4.1.8 introduces the need to include students in the development/delivery of implicit and explicit curriculum. This is a dramatic change from the 2015 EPAS. How is this possible for an undergraduate program? Students can participate in student government and various campus committees, which can affect some change in policies on campus. I am unaware of any avenue to affect curriculum development/delivery outside of course evaluations? This section needs serious attention and clarification.*
 - *Re. 4.1: Consideration needs to be given to programs where resources for areas such as admissions, career services are not within the sphere of the social work programs. Program commitment makes sense . . . but what is the ultimate goal if advocacy for admissions or other areas is not successful?*
 - *Social work needs common standards for "student preparation for a professional practice." We need criteria to assess student performance and conduct that is written with specific behaviors and can be observed. Programs need to use common standards to address all conduct from plagiarism to behaviors in Field. Students need to be educated on requirements.*
 - *Excellent! Outlines well program's responsibility to student sustainment and graduation.*

- *Having student participation in program governance doesn't make sense, perhaps polices? The section on Advisement, retention, and termination is much weaker and should be reverted. It has lost the involvement of social workers in advising and the clear explanation of the policies around retention and termination.*

Educational Policy 4.2: Faculty

Respondents were asked to state their level of agreement with the entire “Faculty” section on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 5.92, reflecting mixed feedback with this competency. Master’s programs had a mean score of just 5.30, whereas baccalaureate programs had mean scores of 6.09.

The following themes emerged from the comments:

- Student/faculty ratio
 - *I strongly disagree with the proposed reduction in the student to faculty ratio for MSW programs. It appears as though CSWE is working to eliminate small MSW programs, which will have a disproportionate impact on programs in smaller, rural areas. As an established MSW program in a rural setting, our MSW Program Director [PD] is responsible for all recruitment and admission activities and duties. This takes considerable time and is not something that our BSW program director is required to do. By increasing the faculty:student ratio for MSW programs to 1:25 and requiring at least four full-time faculty, programs will need to have a minimum of 100 students to stay in compliance. Our program would be forced to double in size. Given our region and rural setting, this is not be feasible. We have a high-quality, affordable program for students in our region built around the exiting standards for MSW PD reassigned time and MSW student–faculty ratio. Please do not impose these harmful changes on small MSW programs.*
 - *Most of these changes are improvements. I have two specific concerns. First, shifting toward benchmarks of “sufficiency” and reduction in the minimal number of faculty for a master’s program will inevitably mean reduced workforce in our unit. These explicit criteria have protected and leveraged FTE [full-time equivalency] for us on our campus. And, our unit has more roles and tracking as part of our student preparation so this allocation, made possible because of the CSWE EPAS accreditation rules, has been fair with regard to overall workload on campus. Reducing the explicit requirements will undermine our appeal for resources. Second, faculty who teach practice should have the requisite credentials or licensing to do so. Lack of this requirement models malpractice and unethical behavior to our students, communities, and interdisciplinary colleagues (who must be licensed). Lack of a licensing requirement among those who teach practice that is regulated and for which the practitioner must be licensed undermines all of social work and social workers. To fix this, a grandfathering period could be included. Also, one fix might be resolving that practice instructors must hold an appropriate professional license in some state where the individual has lived and/or practiced; this would quell unintended inhibition caused by the need to re-license oneself if moving into a new faculty position out of state. This issue really is an imperative.*
 - *Support keeping ratio.*

- *The changes in faculty to student ratio threaten to strongly reduce the quality of education and training MSW students receive. The [program name] School of Social Work faculty is unanimously opposed to this change.*
- *Faculty–student ratio should not be the same for BSW and MSW. MSW is more advanced and rigorous.*
- **Minimum faculty requirement**
 - *The minimum standard of 4 faculty is a serious problem for MSW programs in relation to getting resources from schools and universities. There is a real danger of faculty cuts from administration from 6 back to 4 faculty for programs under 100. I advocate that there be some clause in place that requires that this 4 faculty base for MSW programs is required only for newly starting MSW programs. The 1:25 faculty student ratio for MSW students is also going to be a major strain. This does not take into account things like professional advising, mentoring, career preparation, etc. that faculty do for each student. Moreover, this ration will adversely affect faculty and programmatic resources, especially for those of us who are not in Schools of Social Work. Please seriously consider the negative impact that these standards will have on the quality of programs and the work of faculty with students, especially in light of overwhelming cuts to faculty and the devastation that this will have on the programs' abilities to survive. CSWE accreditation standards are used as the major justification for necessary resources for our MSW programs.*
 - *The change of required faculty from 6 to 4 is great for small programs but could harm some as well if faculty get laid off for that reason.*
 - *The change in minimum requirement of faculty for existing programs could pose a negative impact, whereas this change can have a positive impact for future programs. Maybe a consideration that should be incorporated into this standard would be requirements of faculty based on size of institution/program. The increase in ratio of students to faculty in graduate programs seems to potentially be a disservice to graduate students in preparing them for the field. This is because there will a lessening of individualized attention and mentoring, which can lead to an impact in practice in the field.*
 - *MSW programs can and should be allowed to operate with a minimum of four MSW faculty. There is NO rationale that supports that more than four faculty are needed to teach competencies, as many competencies are addressed in a single MSW course syllabus. MSW faculty are not hired to teach specific competencies. MSW programs can operate most effectively, especially small MSW programs, with a minimum of four MSW faculty in an MSW program. It is a social justice issue to mandate that all MSW programs must have six faculty. We have great diversity in proposed MSW program size and should celebrate and support that. I strongly support a minimum of four (4) faculty in a MSW program.*
 - *1. If an MSW program is large, why reduce the number to 4? Could doing so impact the effectiveness of a program and cause administrators to limit hiring? This is a very complicated issue because COA and COEP cannot please everyone and all programs are unique. With that said, would like more context about reducing the number to 4. Therefore, look forward to reading results from this draft because it would help me think this through more. Regarding the student ratio, I*

understand the change because for no explained reason, MSW programs have always had 1:50 faculty-student ratio. However, I have similar questions as it relates to size of program and would look forward to reading the feedback.

- *The [program name] programs support the changes to the minimum number of required faculty for an MSW program from 6 to 4. This leeway will allow small programs to start without the overbearing financial burden prior to full accreditation of 6 full-time faculty. The [program name] programs also support the change of student to faculty ratio for the MSW from 12/1 to 25/1.*
- *Reduction from 6 to 4 faculty is problematic to ensure enough expertise in all the competency areas needed for teaching. This also increases workload for MSW faculty, which limits their ability to address the relevant and important ADEI and implicit aspects of the curriculum.*
- *B4.2.1: Should still state that a doctoral degree is preferred for the two required BSW faculty. 4.2.3: I strongly oppose revising the faculty:student ratio to 1:25 for Master's programs. This is out of line with standards for Master's programs, and even for upper-level seminar courses. This will put our program at a distinct disadvantage when arguing for more resources at our University. This should stay at 1:12 for Master's programs. Please consider those programs, like ours, who are fighting for more resources to maintain a quality program. Class sizes so large are not appropriate for high-quality education at the master's level!*
- **Administrative release time**
 - *Concern that release time of 25% may be insufficient for field instructors and program directors, even those with fewer than 100 students. Concerns with reducing MSW faculty-to-student ratio from 1:12 to 1:25, as with BSW programs, presents a strain for faculty while enabling universities to save money by doubling the size of the classes. This is neither a faculty-focused nor student-centered approach—it is a university-favored approach. The ability of faculty to provide quality, meaningful feedback is diminished due to this more-than-doubled classroom size.*
 - *Reducing workload ratios is not going to result in high quality programs. Our faculty already have to fight with the larger university for positions and funding for our program, and a reduced standard will NOT be helpful.*

Educational Policy 4.3: Administrative and Governance Structure

Respondents were asked to state their level of agreement with the entire “Administrative and Governance Structure” section on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 6.86, reflecting not so strong agreement with this competency. Master’s programs had lower levels of agreement, with a mean score of 6.38, whereas baccalaureate programs had a mean score of 7.11.

The following themes emerged from the comments:

- **Administrative release time**
 - *25% assigned time for under 100 students is absolutely not sufficient! This will impact those of us who are in administration. A heavy increase in teaching when many of us are already teaching fall, spring, summer.*

- *While I am in support of the addition of the ADEI language throughout, I am not in support of the reduction in reassigned time for MSW Program Directors. Each school has their own context and level of support. For smaller MSW programs, MSW PDs are often responsible for recruitment and admissions activities. The 50% reassigned time is essential to carrying out those activities. Similarly, Field Directors should remain at 50%. Even in smaller programs, there are still the same expectations for site development, training, and evaluation. The amount of work is not proportional to the size of the program. The work is significant, even at smaller schools. Please to not reduce the hours for MSW field directors or Program Directors.*
 - *Could the student FTE be 75? I think this change could lead to burnout for some of the field directors.*
 - *What is the purpose of a reduction in assigned time for smaller programs? If equity is the guide, then should directors of larger programs receive more reassigned time? Why punish smaller programs with no commensurate increase for larger ones? This, like proposed changes to 4.2, seems to prioritize institutions over faculty and students.*
 - *... agree the work of the directors should be valued at both levels and have the same release. However, programs need CSWE's protection at higher levels as well. As a program director, I have over 500 students in my program and have a 50% release time ONLY because CSWE mandates it. There should be support with programs with significantly more than 100 students to help advocate for additional release time. So my concern is not so much what is the difference between 99 and 100, but what is the difference between 100 students and 500?*
- Other things to consider
 - *The same concern about acknowledging the diversity of program and institutional mission exists with respect to administrative and governance structure. It is noted that recognition of program mission is acknowledged. This would be one place to include a referent to institutional mission as well.*
 - *It is imperative that more percentage of time is required for administrative duties. This is critical to ensure visibility of the profession is maintained at a level that is comparable to other professions. It ought not be based on the number of students. Social Work profession's image ought not to be contingent on number of students. Then, the implicit, albeit unintended consequence could mean a lowered social work image is acceptable in smaller social work programs.*
 - *How will shifts in the student:faculty ratio for directors impact administrative course loads? How will programs be expected to articulate calculation of assigned time?*
 - *Tenure should not be listed in the accreditation guidelines.*
 - *Why was retention removed? Do we no longer care about the ongoing success of our faculty? "A minimum of 25% assigned time for fewer than 100 student FTE or a minimum of 50% assigned time for 100 or more student FTE." This is illogical. If we acknowledge that more students require more time, why end at 100? If a program has 500 students, it requires considerably more work than one with 100. It should be 75% for programs with 200 or more students, and 100% if a program has 400 or more. "Commensurate with the program's full-time equivalent (FTE) of students: a minimum*

of 25% assigned time for fewer than 100 student FTE or a minimum of 50% assigned time for 100 or more student FTE.” Similar logic applies to the director of field education. It makes sense to acknowledge that more students require more time to place in the field. Why does the logic stop at 100 students?

FTE Standards

Respondents were asked their level of agreement with proposed standards regarding assigned time for program directors and field directors being commensurate with student full-time equivalency on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 6.37, reflecting a lower level of agreement with these standards. Master’s programs had lower levels of agreement than baccalaureate programs, with a mean score of 5.73 versus a score of 6.65 for baccalaureate programs.

Educational Policy 4.4: Resources

Respondents were asked to state their level of agreement with the entire “Resources” section on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 8.17, reflecting agreement with this competency.

The following themes emerged from the comments:

- Faculty
 - *25% assigned time for program directors does not at all take into consideration the differential impact of administration depending on the university that you are in. In my university, I am both a program director and chair (the two roles are combined). This means that the chair position, which carries with it responsibilities that a Dean of a School of Social Work would have at other institution, would be unmanageable at 25%. I already teach spring, fall, summer, and this would double my teaching load, with no change to my administrative responsibilities to the university. This could not be done. I propose that CSWE take into consideration the different ways that program director is combined with Chair and make distinctions. I urge you to consider having at least [that] those MSW programs with chair and program director responsibilities remain at 50%. The field program director position also needs to stay at 50%; as it is field directors are under enormous stress, many are leaving, because they have teaching, placement, research, service responsibilities like other faculty and the field program responsibilities as well. The coordination of agencies and the like is more difficult, not less. Moreover, many field positions also carry additional responsibilities within the university of clinical compliance for the school (not a school of social work). Please, please, do not change the 50% requirement as the base for program & chair and field directors.*
 - *Headcount of students does not necessarily reflect the load on coordinators. It varies with schools, coordinator responsibilities. It varies if students are full time or part time, Bachelor’s or Master’s students. Can this type of question rather have programs reflect on the sufficiency of program coordinator time? These decisions at our school are determined by academic affairs—provost and deans.*

- *We need to invest in faculty and staff professional development and engagement in communities and practice, not just research.*
 - *Changes to administrative resources will increase workload for many. The formula seems arbitrary.*
- Assistive technology
 - *While I support assistive technology, students need more access.*
 - *I agree with the spirit, but how will programs be expected to meet the requirements to meet the assistive technology for online students? For example, are we expected to help students with computer access and internet access if they are online?*
 - *Can programs meet the requirements for assistive technology when there are university level offices doing this work?*
- Budget
 - *4.4.1 does not make clear how schools with integrated BSW/MSW degree programs should have the budget form. Some schools would have to submit purely fictional documents if forced artificially to divide expenditures between programs.*

Educational Policy 5.0: Assessment

Respondents were asked to state their level of agreement with the entire “Assessment” section on a scale from 1 (*strongly disagree*) to 10 (*strongly agree*). The average agreement score is 7.63, reflecting agreement with this competency.

The following themes emerged from the comments:

- Competency assessment
 - *Benchmarks should remain a component of assessment to encourage continual improvement. Programs can justify minimum benchmark goals and present plans to increase achievement. The loss of benchmarks is the loss of an explicit incentive for program improvement. The removal of multi-dimensional assessment reduces accountability and flattens the social work curriculum. These multiple dimensions serve as intention and reminder to provide a holistic, competency-based education.*
 - *We need more discrete knowledge elements and practice behaviors to enhance assessment.*
 - *The nine competencies form the backbone of the EPAS, but there's no common measure of “practice competence.” The standard doesn't offer direction for measuring student competence or require reliable and valid measures from programs. Without this how does CSWE ensure quality or know if programs are graduating skilled social workers?*
 - *Glad the dimensions are being removed as they made the collection and reporting of data overly cumbersome, thus reducing the ability of stakeholders to comprehend the data. This in turn reduced the ability of the program to have stakeholder input into suggestions for improvement.*

- ADEI assessment
 - *With ADEI being the focus of the Implicit Assessment, it omits multiple areas of implicit assessment. Also, with the ADEI terminology being so vague; how is this measurable?*
 - *ADEI can be addressed more specifically in this section. What can be added that will encourage schools to examine racial bias in our practices more intentionally?*
 - *If our school is located in a conservative area and our students tend to have a conservative viewpoint, will we fail standard 5.0.2(a) if we are not able to measurably alter their implicit beliefs/values regarding ADEI despite our having a good plan to emphasize these and despite our explicit and implicit efforts?*
 - *I'm completely supportive of the motivation behind adding ADEI; however, the implementation of section 5.02 is confusing. Because ADEI will be embedded in all other areas of assessment (student learning, explicit curriculum, faculty, etc.), how is this portion different? I'm not clear on what I'd be reporting on that wouldn't be redundant.*
 - *We support ADEI work and assessing this work. I am concerned with adding an additional assessment process, especially if there will be conversation about heightening administrative work loads. Is there a way ADEI assessment could be incorporated into already-existing assessment processes while maintaining the value of ADEI work?*
- Faculty development
 - *Love the removal of the dimensions in the AS [Accreditation Standard]. If the wording remains, I would hope the COA would provide ideas/resources re: measures they deem to be reliable and valid. I like the ADEI focus of the implicit assessment.*
 - *Clarity on assessment and what is and is not allowed is necessary. . . . The ADEI assessment is a heavy workload; is there a way we can assess programs for it, adding it to existing assessments vs. adding another assessment? I agree we need to assess for it; adding assessments without taking something away and increasing teaching load and work loads will not be sustainable for programs.*
 - *How are programs going to assess their anti-racism efforts, concretely?*
 - *The programs will need guidance regarding the ADEI assessment. It is extremely difficult to demonstrate improvement in ADEI. Please don't just drop this requirement on programs without providing resources.*
- Reliable and valid tools
 - *Are you saying that programs can no longer use assessments that are home-grown? Like a standardized assignment that is graded for a course faculty who teach different sections? Even with a rubric the grading would be unlikely to be reliable or valid. Please add to glossary what you mean by reliable and valid. The wording of the sentence in 5.0 that addresses reliable and valid tools is NOT unequivocal. Rather you state you want programs to strive to do this. It should be one or the other, not both.*

- *I don't like the portion regarding reliable and valid tools. To me this is moving too far into standardized testing, which has received a great deal of push back from the K-12 sector. Moreover, we know that "standardized" tools are often not in line with ADEI efforts as they are typically not normed across various identities/backgrounds, etc. It also leads to the marketization of testing, which leads to profits for the distributors at the cost of students and programs.*

Overall Themes from the Final Open-Ended Feedback Question and Feedback Letters

- Concerns about workload and prescriptive standards including faculty ratio, minimum number of faculty, and release time.

Subthemes:

- Impact on women and BIPOC [Black, Indigenous, and people of color] faculty:

- *Research shows us this service and teaching burden will fall disproportionately on women and BIPOC. So, while CSWE wants to expand the focus on diversity and anti-racist work, in the same document it is creating the policies that will do the exact opposite. The new 2022 policies will create greater disparities in the likelihood of women and BIPOC gaining tenure. When faculty are overburdened with higher class sizes, and more program service, scholarship will be forced to be secondary. Those with historic privilege will continue to be the ones who will be more likely to be able to engage in research and achieve tenure.*

- Asking for more with potentially less resources:

- *Ostensibly CSWE is proposing an enhanced response to the current environment highlighting disparities, but it is removing the infrastructure required to do so.*

- ADEI, specifically the addition of anti-racism.
 - Include Critical Race Theory alongside anti-racist practice.
 - ADEI language goes too far.
 - ADEI language is too narrow.
 - Need to define ADEI.
 - Add anti-oppressive language.
 - Prescriptive on theories.
 - Controversial language.
 - State and local legislation banning CRT and implied connection to a particular theory.
 - Appreciate addition of anti-racism.
- Add *political* to justice areas and add *equity* when talking about justice.
- Add *financial justice* when referencing justice throughout.

- Add *policy* when referencing client systems “individuals, families, groups and communities.”
- Competency behaviors are stacked.
- Incorporate NASW Code of Ethics, especially with their recent updates.
- Strengthen interprofessional focus.
- Need more focus on technology.
- Need rationale for changes.
- Add democratic values and structures such as voting, civic participation, civic engagement



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