



## **NOTICE AND RATIONALE FOR COAMFTE DECISION TO WITHDRAW FROM RECOGNITION BY THE U.S. DEPARTMENT OF EDUCATION (USDE)**

*(Authored by the Commission on Accreditation for Marriage and Family Therapy Education (COAMFTE) and approved at the COAMFTE meeting in April 2013)*

The Commission on Accreditation for Marriage and Family Therapy Education (COAMFTE) is recognized by the U.S. Department of Education and Council for Higher Education Accreditation (CHEA) as an accrediting agency for graduate degree and clinical training programs in marriage and family therapy.

### **Background**

*Commission on Accreditation for Marriage and Family Therapy Education (COAMFTE)* – The purpose of COAMFTE accreditation is to assure quality education in graduate marriage and family therapy programs. It provides a reasonable basis for evaluation of potential employees and a safeguard for the protection of clients.

*U.S. Department of Education (USDE)* – USDE recognizes accreditors as gatekeepers for federal funds. In this role, USDE is concerned mainly with the mechanisms accreditors have in place to monitor the federal funding process. Accreditors recognized under Title IV of the Higher Education Act of 1965, like regional accrediting agencies, fall primarily in that category and provide its accredited institutions with access to major federal financial funds. COAMFTE is not recognized under Title IV and provides access to only a small number of financial programs.

*Council for Higher Education Accreditation (CHEA)* - CHEA's purpose is quality assurance of higher education through accreditation. In this role, it provides a "seal of approval" for COAMFTE. Since CHEA's focus is quality assurance through accreditation, CHEA recognition enables COAMFTE to fulfill its purpose while providing an external review of COAMFTE processes, procedures and standards for accreditation. COAMFTE and COAMFTE-accredited programs directly benefit from CHEA's review process as it provides a system of checks and balances.

Since the federal regulations render COAMFTE ineligible to operate as a gatekeeper for major federal financial assistance programs, the benefit of USDE recognition is negligible. Yet, the cost of maintaining USDE recognition has steadily increased over the years, i.e., tracking changes in federal regulations, developing policies that do not apply to COAMFTE-accredited programs and would impose on institutional freedom. After long and careful deliberation at its November 2012 meeting, COAMFTE determined that the costs of maintaining USDE recognition outweighed the benefits and voted not to pursue USDE recognition, effective April 15, 2013. In making the decision, COAMFTE also determined that such a course of action at this time would not prevent COAMFTE from pursuing such recognition in the future if things changed such that USDE recognition was determined to be relevant and vital for COAMFTE and its accredited programs. This document provides information and the rationale for this decision (See also Appendix A).

## History

### *USDE*

At the time the American Association for Marriage and Family Therapy (AAMFT) was working on being recognized as a core mental health profession, it looked to USDE as a way of legitimizing the profession through education. COAMFTE (formerly Committee on Accreditation of AAMFT) gained official recognition by the United States Office of Education, Department of Health, Education, and Welfare in 1978. In 1980, the Department was renamed to the USDE and has continued its recognition of COAMFTE. Originally, COAMFTE was recognized by USDE under Title IV of the Higher Education Act of 1965. Recognition under Title IV, allowed programs accredited by COAMFTE to establish eligibility to participate in the federal student financial assistance programs administered by the Department.

At the time, USDE was the only organization to provide external recognition. While the purpose of USDE recognition was to ensure that federal funds were appropriately distributed and managed through Title IV accreditors, as the only external recognition agency, it created a perception of providing a stamp of approval for quality. During that period, the benefit of USDE recognition to COAMFTE was significant. Even with the time it took COAMFTE to gain USDE recognition and maintain it by placing certain constraints on accredited programs, it was worth it. COAMFTE-accredited programs were eligible to participate in the major federal student financial assistance programs, creating a direct benefit to students.

Fast forward to the early 1990s when USDE implemented re-authorization of Higher Education Act (HEA) and changed its recognition criteria, rendering COAMFTE ineligible to be recognized as a Title IV accreditor. That role was shifted primarily to regional accreditors who accredited universities. COAMFTE was eligible to be recognized only under the non-Higher Education Act criteria. The change in the USDE recognition criteria meant that COAMFTE-accredited programs were no longer eligible to participate in the federal student financial assistance programs administered by the Department. That eligibility was now determined through regional accreditation of universities. As long as COAMFTE-accredited programs were housed in regionally accredited universities, their students were still eligible for federal financial programs. This change, however, effectively diminished the benefit of USDE recognition to COAMFTE.

### *CHEA*

While the re-authorization of the HEA was taking place, the world of higher education was still looking for a recognition entity that would provide a stamp of approval for quality. Like other accrediting agencies, COAMFTE sought a separate recognition by an entity with a direct interest in the quality of education not weighed down by fiscal interests. In 1994, COAMFTE achieved recognition by the Commission on Recognition of Postsecondary Accreditation (CORPA), the successor to the Council on Postsecondary Accreditation (COPA). In 1997, CORPA was dissolved and the Council on Higher Education Accreditation (CHEA) was created.

### *Licensure: Unintended consequences*

The unintended consequences of USDE recognition are such that it made its way into the licensure laws. Upon review of state licensure, eight states (CA, CT, GA, FL, KY, MA, MO, and RI) were identified as having references to USDE in their language. In many cases these references were incorrect, referring to USDE as granting accreditation/approval of *academic programs* instead of its role as providing recognition for *accrediting agencies*. AAMFT began working with the divisional leaders in those states to correct the language.

Licensure is controlled at a state level. The purpose of licensure is to protect the public by ensuring that practitioners meet the minimum requirements for education, practice and examination. Part of the minimum requirements is an educational degree from a program accredited by an agency appropriate to that field. COAMFTE accreditation of MFT programs provides assurance of the quality of education in the field of marriage and family therapy. USDE recognition, the purpose of which is to monitor financial funds flowing to institutions, has no bearing on either the quality of MFT educational programs or an applicant's ability to become licensed. The Commission does not anticipate that COAMFTE withdrawal from USDE recognition will impact graduates in obtaining licensure.

States where the language erroneously links an applicant's ability to become licensed to USDE accreditation/approval/recognition of MFT programs and/or the Commission on Accreditation for Marriage and Family Therapy Education (COAMFTE) were identified and encouraged to revise the language. Following a meeting in Spring 2012 with AAMFT Divisional Leaders of those states (CA, CT, GA, FL, KY, MA, MO, RI), the AAMFT staff shared a fact sheet with the Divisions and COAMFTE-accredited programs. Staff also worked with divisions to propose a revision in language to assist the divisions in correcting the state licensure language in order to protect MFT applicants in those states. Already, four states have introduced bills that will effectively eliminate USDE references in state law. The remaining states have access to the staff to guide them through the process. For more information on the status of these changes, please see Appendix B.

### **Current Status**

#### *Cost-Benefit analysis*

The diminishing benefits of USDE recognition compelled COAMFTE to review the cost of maintaining it. In 2010, USDE significantly changed their recognition criteria resulting in further regulation that included federal definition of a credit hour; changing the definition of Public Member; requiring programs to provide accreditors with copies of all student complaints; state authorization, etc. All USDE-recognized accreditors had to absorb these changes regardless if they operated as a gatekeeper for major federal financial assistance programs or not. The new regulations were directed at Title IV accreditors with oversight of major federal financial aid programs. They were not intended for accreditors like COAMFTE who are not eligible to be a Title IV accreditor. And yet, COAMFTE had to amend its process, policy, and procedures to meet the criteria.

More and more hours of staff time was spent in tracking changes in state regulation, reviewing COAMFTE policies and procedures in relation to the federal changes, and working towards changes that will mostly hinder the flexibility of the accreditation process. COAMFTE staff's role is to provide support to programs going through the accreditation process, assist the Commission with creating and delivering training workshops, expanding the pool of volunteers, and staying current with best practices, among many. Staff's ability to focus on these important issues was challenged by the time spent on tracking federal regulations. As COAMFTE began the process of seeking renewal of recognition with USDE in 2011, it was faced with a dilemma of higher costs and few benefits.

In 2011, COAMFTE surveyed its accredited programs to assess the cost-benefit of dual recognition by USDE and CHEA. The survey showed that 82.9% of respondent programs have never participated in the federal programs accessible through USDE recognition of COAMFTE. Over 97% of respondents reported that the direct benefit of USDE recognition of COAMFTE was inconsequential and/or unknown. When faced with increasing costs of COAMFTE accreditation only 5.7% somewhat agreed that COAMFTE should continue with dual recognition.

*Why USDE recognition is no longer a benefit*

The re-authorization of HEA and the change in the recognition criteria also brought more regulation that USDE-recognized accreditors and programs they accredit had to absorb. The changes made it clear that the seal of approval for quality that was previously associated with USDE, correctly or incorrectly, became the seal of approval for management of major federal financial funds. And COAMFTE was not allowed to be a player. Today, USDE recognition of COAMFTE under non-HEA allows COAMFTE-accredited programs to participate in only two remaining programs: National Health Service Corp Loan Repayment Programs and the Faculty Loan Repayment Program. The cost of USDE recognition is meeting an exorbitant number of federal regulations aimed at accrediting agencies who are the major players under Title IV with access to major federal financial assistance programs. The benefit of USDE recognition is all but eliminated. While a small number of COAMFTE-accredited programs indicated that they access federal programs through COAMFTE status of being USDE-recognized, the cost of maintaining the recognition to many is outweighed by the benefit to a few.

*Why is CHEA a continuing benefit*

CHEA is “a national advocate and institutional voice for self-regulation of academic quality through accreditation” and has recognized the Commission since CHEA’s inception. As “a primary national voice for accreditation and quality assurance”, CHEA provides COAMFTE with a stamp of approval for quality. With the mission that aligns with the purpose and focus of accreditation, CHEA provides accrediting agencies with a system of checks and balances, and creates a process parallel to accreditation that requires accrediting agencies to self-evaluate and improve. COAMFTE benefits from this process as it provides the validation as an external recognition body and serves as a more appropriate recognition for the intent of COAMFTE specialized professional accreditation and the needs of MFT programs.

Appendix A

**INFORMATION CONSIDERED IN THE DECISION**

<b>Information</b>	<b>Determination</b>
May 2011 survey of COAMFTE programs re: the Cost-Benefit of USDE Recognition	Handful of programs utilizing Federal funding aspects of USDE recognition.
AAMFT Legal Department Review of State Licensure laws regarding inclusion of USDE recognition by the AAMFT Legal Department and notification to State Divisions re: actual or implied licensure language that linked licensure to USDE recognition and that might be potentially problematic for future LMFT applicants seeking licensure (8 states – CA, CT, GA, FL, KY, MA, MO and RI)	Review of the laws revealed that in these states the laws incorrectly referred to USDE recognition (e.g., the law stated that degrees had to be from MFT programs with USDE recognition and the USDE doesn't recognize programs but rather accrediting bodies such as COAMFTE that then accredits MFT programs). The state divisions in these states were notified of language problems and were already in the process of making requisite changes in licensure language.
USDE Scope of Recognition and Meaning. USDE recognizes accreditors as gatekeepers for federal funds, primarily through Title IV funding, however, federal regulation changes render COAMFTE ineligible to operate as a Title IV gatekeeper.	COAMFTE-accredited programs obtain Title IV funding through regional accreditation, <b>not</b> COAMFTE accreditation.
Cost of meeting USDE Recognition requirements (Staff, Policies and Procedures)	In order to meet the USDE requirements, COAMFTE would have to revamp its policies and procedures in order to come into compliance. In addition, COAMFTE would then have to modify how it tracked compliance, with corresponding policy and procedural changes that would require significantly more staff and Commission time.
Intended and unintended consequences of not maintaining USDE Recognition	This included a discussion of the following items: Accredited programs' perceptions and implications, competing mental health profession accreditors, historical value/attachment to USDE recognition, external perceptions of USDE recognition, Education/Understanding of USDE recognition.
Accredited Programs' Perceptions and Implications of Discontinuing USDE Recognition	Important to make sure programs understand the decision and why it was made.
Implications with regard to Competing Mental Health Accreditors and their recognition and influence (i.e. American Psychological Association and American Counseling Association)	Discussion about political arena and the importance of the Association, Board and Divisions being educated and prepared and ready to advocate for the profession and counteract any inaccurate uses by other associations of USDE recognition and/or decision to withdraw recognition.
Historical value/attachment to USDE recognition	Discussion of the history of seeking USDE recognition and the meaning attached to it. Important that others be educated about the true value, cost and benefit of USDE recognition, changes in purpose of

	USDE recognition and transparency in how COAMFTE reached its decision regarding USDE recognition.
External perceptions of USDE recognition	Discussion of how others outside of AAMFT and accredited programs view/use USDE recognition. Again determined that education would be vital to correcting misperceptions about actual purpose/benefits of USDE recognition.
Education/Understanding of Accreditation	With so much of the discussion of items identifying the importance of education and understanding of Accreditation and USDE recognition, COAMFTE discussed how critical this would be once a decision had been made.
Transparency regarding the decision and rationale	Discussion of how important transparency and sharing of the decision and rationale for the decision would need to be.
Regional vs. Specialize Professional Accreditation	Regional USDE Accreditation stills provides coverage to degree granting programs for those that are in regionally accredited institutions
Implications for COAMFTE-accredited Post-degree Institutions (PDIs)	Discussion of how many PDIs actually utilize USDE recognition as means of securing federal funding for students and that changes in USDE recognition no longer make this an avenue for such programs to access such funds.
Standards Review Committee revisions to standards necessitated by USDE requirements	Discussion of standard changes that would be required to come into compliance with requirements and the corresponding time and expenses.
Council for Higher Education Accreditation (CHEA) vs USDE recognition	Discussion of need for external validation as an external recognition body and that CHEA is a more appropriate recognition for the needs and intent of MFT specialized professional accreditation.
Implications for Expansion of COAMFTE-accredited programs, including international programs	With the increased interest from programs around the world, the relevance of USDE recognition becomes less significant.
COAMFTE financial dependence on AAMFT and need to become more financially independent	Discussion of the need to maximize efficiency of COAMFTE resources and keep expenses down.
Cost-Benefit Analysis of Continued Recognition	Review of costs and benefits associated with USDE recognition.
Losing Recognition vs Withdrawal of Recognition	Better to withdraw from the recognition process based on COAMFTE's determination rather than losing it due to non-compliance.
Implications on future USDE Recognition	Better to withdraw from the recognition process and keep the option of pursuing recognition in the future should things change and the benefits of USDE recognition again become relevant and outweigh the costs.

## Appendix B

### **CURRENT STATUS OF CHANGES IN LICENSURE LAW IN STATES WITH INACCURATE REFERENCES IN THE LANGUAGE**

1. California – In March, the Division legislative chair indicated that the state would like to hold off on introducing the suggested language until next year or not introduce it if not needed. AAMFT Legal Staff suggested they could wait until next year, but not abandon all efforts to amend the law. California’s language is the least worrisome.
2. Connecticut – In March, House Bill 6646 was introduced. This bill will eliminate the USDE references in state law.
3. Florida -- In March, House Bill 1161 and Senate Bill 1368 were introduced. These bills will eliminate the USDE references in state law and make some other key changes to the MFT licensure law.
4. Georgia – In February, Senate Bill 128 was introduced. This bill will eliminate the USDE references in state law and add the term “diagnose” to the MFT scope of practice. It passed the Senate and a House committee. However, the House did not pass the bill due to reasons that were unrelated to the legislation. The House will consider this bill in early 2014.
5. Kentucky – No legislation has been introduced on this issue.
6. Massachusetts – In December, the Division decided not to pursue advocacy on this topic. Staff with the licensure board that regulates MFTs told the Division that there would not be any problem recognizing applicants from COAMFTE –accredited programs after any change is made.
7. Missouri – Earlier this year, Senate Bill 234 was introduced and has recently passed the Senate. It will be heard by the House shortly. This bill will eliminate the USDE references in state law and make some other key changes to the MFT licensure law.
8. Rhode Island – No legislation has been introduced on this issue.