The essence of professional education in social work is best conceptualized as “practical knowledge,” the kind of knowledge that is “imparted and absorbed.” The purpose of this report is to review the current status of online graduate social work education and to consider the extent to which the proliferating online MSW programs are imparting the practical knowledge that professional social workers need. The Clinical Social Work Association has been studying this subject for the past year through the Distance Learning Committee. This Report reviews the current status of online or distance MSW education based on the CSWE Education Policy and Accreditation Standards and explores whether these programs adequately address the educational and ethical objectives of our profession. Our focus here is on those programs which offer a
complete MSW education via online or distance learning, not on the use of occasional distance learning courses within the context of a classroom-based MSW program.

Many social workers are concerned that the relational skills and integrative knowledge essential in social work practice are difficult, if not impossible, to convey in distance education formats where there is little or no in-person dialogue between faculty and students. Social work is an essentially relational enterprise; social work education should entail this same relational quality to achieve consistency and quality. CSWA is concerned about the ability of online MSW programs to adequately monitor their students' progress in both academic and field education settings. This is particularly problematic in field internships where online education programs must quickly establish connections with field supervisors in agencies in distant communities without longstanding relationships between agencies and professional schools. CSWA also considered various ethical concerns implicit in online professional education. For purposes of this report, the terms “distance learning” and “online learning” are synonymous, though students may in fact not be at a geographical distance from the location of the school they are attending online.

This report has several appendices. Appendix A presents information gathered from a sample of five social work schools offering distance learning in social work through detailed surveys, and three through website review. Appendix B presents a summary of the Distance Learning programs currently operating. Appendix C shows the template used in gathering information from schools offering distance learning programs for a Master's in Social Work (MSW). Appendix D shows the online education standards developed by the American Psychological Association Commission on Accreditation.

History

There are approximately 404,000 licensed social workers in the country (ASWB, information provided on August 23, 2013). Licensed social workers (LCSWs) are the largest group of mental health clinicians at 170,000, NASW, 2012). Licensed clinical social workers are the largest group of licensed social workers – over 60% – in a self-defined survey by NASW (2006), and are the guardians of the human connection. Learning to develop and maintain this connection is the basis for everything LCSWs do. The way that students are brought into social work education programs and guided through them is a key component of the process. MSW programs are designed to link didactic coursework with person-to-person connections in practicum. Understanding of person-in-environment is key to the way that social workers connect with clients, anchored in the biopsychosocial assessment.

In most states, an MSW degree and two years of supervised practice experience qualifies social workers to engage in the private practice of psychotherapy. Social workers with MSW degrees are the largest cohort of mental health providers providing psychotherapy services to individuals with psychiatric disorders. Although enabling such professional endeavors is not the explicit objective of most social work graduate programs, it is a significant motivator for many students to enroll in graduate social work education. As such, the quality of MSW education has a significant public policy impact in preparing social workers to deliver effective, culturally competent and ethical mental health services in both agency and private practice.

The first “distance learning” MSW program began at the Florida State University in 2002 (Appendix A). Since then, approximately 20 schools have established, distance learning programs for an MSW degree and others are in development. (There are also distance learning programs for Bachelor in Social Work degrees, which
were not reviewed.) There is wide variation in the size of distance education; Fordham University having 25 distance learning MSW students, University of New England having 800 distance learning students, and University of Southern California having 1500 distance learning students. In the case of University of New England, this is much greater than the 150 students who matriculate on campus; University of Southern California has approximately 900 residence students in four campus settings.

There are online programs available in numerous fields including engineering, mathematics, history, business, criminal justice, psychology, and many more. There are currently over 8000 online programs of all kinds; 65% of all schools with residence programs have online programs (“Best Online Programs”, U.S. News and World Report, retrieved on June 24, 2013, http://www.usnews.com/education/online-education/articles/2013/01/14/usnews).

However, unlike other fields of academic study, the MSW is a professional degree which is an entrée into professional practice in mental health and health care. As such, social workers have a responsibility for the health, safety and well-being of their clients which require, beyond a considerable fund of information about relevant subject matters, high levels of professional competence, judgment and ethical standards.

CSWE’s Educational Policies for Residence Programs

Unlike the APA’s Commission on Accreditation, the Council on Social Work Education’s (CSWE) educational standards has not, to this date, specifically addressed issues in online or distance education. This omission concerns CSWA which supports the establishment of accreditation standards for online learning and supervision in social work education which acknowledge the need for substantive in-person interaction in both the academic and internship settings. A review of the current status of online social work education in light of existing CSWE standards can illuminate whether these online MSW programs today are meeting these standards and whether new standards are need to address the challenges presented by new technology.

The Council on Social Work Education (CSWE) has created standards for all Bachelor’s and Master’s social work degrees which are the bedrock of social work higher education. A close reading of these standards, particularly the Education Policy and Accreditation Standards (EPAS), suggests that most, if not all of the online MSW programs, do not meet CSWE criteria for accreditation. The most recent CSWE Education Policy and Accreditation Standards (2012) states: “Social work education—at the baccalaureate, master’s, and doctoral levels—shapes the profession’s future through the education of competent professionals, the generation of knowledge, and the exercise of leadership within the professional community.” The question is whether these goals can truly be met in a program that is not based primarily on the human connections that are the basis of social work.

Further, CSWE’s Educational Policy 2.1.1 states that students should “Identify as a professional social worker and conduct oneself accordingly.” The process of professional identification is hard to implement without in-person interaction between faculty and students. Though some schools surveyed claimed that there was no difference in student learning whether the student attended a residence program or a online program, CSWA is concerned that evaluation of professional identification would be part of the ‘implicit’ goals of social work education (see below, page 9) which may be difficult to assess through examinations or papers.
In addition, Educational Policy, 2.1.2 states a goal that students “Apply social work ethical principles to guide professional practice.” CSWA believes that the teaching of ethics can be most successful through substantial dialogue between faculty and students in a classroom setting. The limitations of synchronous distance learning with the technology available are significantly limited compared to the ways that faculty and students can relate in an in-person environment (see Ethical Considerations below).

One of the biggest concerns CSWA has regarding distance learning is the development of critical thinking skills. As Educational Policy 2.1.3 states, “Social workers are knowledgeable about the principles of logic, scientific inquiry, and reasoned discernment. They use critical thinking augmented by creativity and curiosity. Critical thinking also requires the synthesis and communication of relevant information. Social workers demonstrate effective oral and written communication in working with individuals, families, groups, organizations, communities, and colleagues.” Development of critical thinking involves interaction with faculty by students, a process that can be very difficult to achieve in asynchronous distance learning, especially in a helping-oriented profession. While some online course material may be consistent with the kind of rote learning that is a common element in asynchronous online education, the critical thinking necessary to become a social worker requires a more complex process which is only available through direct contact and active, in-the-moment dialogue (see above). While some course material may be consistent with rote learning, the critical thinking necessary to become a social worker requires a more complex process which is only available through direct contact and active, in-the-moment dialogue (see above). Further, the development of “oral communication” is hampered by distance learning since it does not occur in asynchronous learning and is limited in synchronous learning.

One of the key principles of social work practice is ‘person-in-environment’, a concept which means that the social worker understands the environment in which a client lives and works as well as the subjective inner experience of the client. Educational Policy 2.1.10(a-d) and Educational Policy 2.3 spell out the way this goal is met in the classroom and in field work as follows: “Professional practice involves the dynamic and interactive processes of engagement, assessment, intervention, and evaluation at multiple levels.” (EPAS 2.1.10(a)); and “It is a basic precept of social work education that the two interrelated components of curriculum—classroom and field—are of equal importance within the curriculum, and each contributes to the development of the requisite competencies of professional practice. Field education is systematically designed, supervised, coordinated, and evaluated based on criteria by which students demonstrate the achievement of program competencies.” (EPS 2.3) Students whose classroom and field education are in two different geographical areas of the country are unlikely to be “interrelated components” which lead to “competencies of professional practice”; this may be further complicated by practicum placements that are virtual, a goal of two schools surveyed (see Appendix A).

CSWA is aware of two recent instances in which a school contacted possible placements for students a month before the semester was to begin, with no prior communication. Finding field placements in the modern world is challenging for many schools for a number of reasons. Nonetheless, schools should have some clear guidelines for what kind of standards should apply to finding field placements, standards that are consistent with EPAS 2.1.1: “It is a basic precept of social work education that the two interrelated components of curriculum—classroom and field—are of equal importance within the curriculum, and each contributes to the development of the requisite competencies of professional practice.” Clarification from CSWE in this area would be welcome.
The “Implicit Curriculum” in Social Work Education

Important as the explicit policies noted above are to a successful social work education, the implicit curriculum is just as significant to that education. The CSWE standards state (in EPAS 3.0):

*The implicit curriculum is manifested through policies that are fair and transparent in substance and implementation, the qualifications of the faculty, and the adequacy of resources. The culture of human interchange; the spirit of inquiry; the support for difference and diversity; and the values and priorities in the educational environment, including the field setting, inform the student’s learning and development. The implicit curriculum is as important as the explicit curriculum in shaping the professional character and competence of the program’s graduates (bold added). Heightened awareness of the importance of the implicit curriculum promotes an educational culture that is congruent with the values of the profession.”*

This eloquent description provides compelling reasons for maintaining in-person contact between students and faculty, students and supervisors, supervisors and faculty, and between students; satisfying the key elements of the implicit curriculum, as defined by CSWE, is exceedingly difficult in a distance learning program.

The importance of the “implicit curriculum” in social work education has been discussed in detail in a recent article by Bogo and Wayne (2013). Describing how the implicit curriculum impacts CSWE objectives to help each student develop a professional identity with appropriate professional conduct, the authors suggest that “this can be accomplished through behaviors that include the practice of personal reflection and self-correction to ensure continual professional development, as well as evidence of professional roles and boundaries and demonstration of professional demeanor in behavior, appearance, and communication (EPAS, 2008, p.3). These practice behaviors are designed to articulate and teach students how to interact at all levels in their professional lives, including every arena of their educational environment. The desired behaviors can be fostered both within and outside formal structures such as classrooms, committee meetings, gatherings of students and faculty/staff, and in field placement” (p. 4).

The authors specifically discuss the importance of dealing productively with negative interactions that transpire in the classroom setting "when faced with student behaviors that challenge the maintenance of a desirable educational milieu" (p. 8). How faculty address such situations models professional interventions in situations outside of the classroom. This dimension of the implicit curriculum is severely impaired without an in-person “culture of human interchange”.

Similarly, the fundamental social work focus on understanding of diversity (EPAS 3.1) is almost impossible to meaningfully sustain in distance learning:

The program’s commitment to diversity—including age, class, color, culture, disability, ethnicity, gender, gender identity and expression, immigration status, political ideology, race, religion, sex, and sexual orientation—is reflected in its learning environment (institutional setting; selection of field education settings and their clientele; composition of program advisory or field committees; educational and social resources; resource allocation; program leadership; speaker series, seminars, and special programs; support groups; research and other initiatives; and the demographic make-up of its faculty, staff, and student body).
Exposure to diversity is not achieved when students and faculty see only remote visual images of each other on a computer screen; genuine exposure to diversity entails in-person interactions, dialogues, and the formation of meaningful relationships.

While the autonomy of faculty and administrators in schools of social work in developing their own programs is a valid goal (EPAS 3.4), the way that distance learning has changed the learning environment may lead school leadership to implement distance learning programs in ways that are inconsistent with many of the EPAS provisions listed above. The lack of integration between CSWE’s standards and educational policies in a world where faculty and field instructors may never meet in-person; where students may never meet in-person; where students and faculty may never meet in-person, is not the world that CSWE handed over to schools of social work to effectively educate social work students. The fact that some schools have chosen to interpret social work educational standards as consistent with asynchronous teaching is a contradiction in terms. Even with the best of intentions, schools that build programs which are so fragmented and remote are undermining the explicit and implicit goals of social work education. It is essential that CSWE develop standards and regulations for incorporating distance learning into social work Master’s programs in a responsible way, consistent with longstanding educational philosophy, pedagogical principles and research, and pertinent ethical standards.

The primary goals of social work education as defined by CSWE’s EPAS include developing the ability to emotionally connect, understand, and help others; to learn to build an empathic human connection with clients through coursework and practicum education; to develop the ability to conduct comprehensive biopsychosocial assessments; and provide relief for emotional challenges and disorders through psychotherapy and counseling.

**Academic and Classroom Issues**

The academic issues in distance learning programs that CSWA considered included syllabi, use of synchronous (real time) and asynchronous methods, academic advising, admissions, student locations, and coordination between administrators, faculty, and field instructors.

While the syllabi in online MSW programs are often identical to the syllabi used in the campus-based programs, the classes themselves in online programs involve synchronous (i.e. interactive real-time video) and asynchronous components. Asynchronous learning involves learning that is not in the real-time presence of a faculty member. This can involve viewing power point lectures and videos and engaging in text-based dialogue with faculty and fellow students with discussion boards, blogs and wiki sites. Currently, as best we were able to ascertain, the largest cohort of online MSW programs only uses asynchronous learning activities and thus has no real-time interaction with faculty.

Students are evaluated using many of the same methods as in on-campus courses, including papers and projects such as videotaped role plays. In at least one program, actual real-time examinations were used with the assistance of a web-based proctoring company which observes the student taking the test via a webcam.

In our review of current online MSW programs, we were unable to find a single program which offers the same number of hours of synchronous hours of instruction as their campus based programs. The MSW program at University of Southern California offers 75 minutes weekly of synchronous instruction in all its (3 credit hour) classes and the University of Tennessee appears to offer an unspecified amount of synchronous instruction in
most or all of its classes. (Cummings, Chaffin, and Cockerham, in press) Further, the University of Tennessee
distance learning program requires all online students to participate in Saturday campus based seminars in at
least three practice hours of “clinical” courses. In at least one class addressing group interventions, this
required attendance in 3 four-hour Saturday classes. Program faculty noted that “given the nature of group
work, it was believed that some in-person group interaction was necessary to develop and practice group
leadership skills” (Cummings, Foels, and Chaffin, 2013).

While the quality and quantity of faculty-student and student-student interaction is higher in the synchronous
(real-time video) “classroom” than in asynchronous courses, the technical limitations of interactive video
constrain synchronous communications. In a forthcoming article, Reamer (2013) shares the observations of an
instructor in an online MSW course: “The technical limitations of the ‘virtual classroom’ are
omnipresent. Depending to some extent on the speed of each student’s internet connection (wireless, cable,
DSL, etc.), the visual acuity of each person’s image varies greatly. Of course, the “box” on one’s computer
screen for each participant is relatively small and facial gestures can be difficult to discern even when internet
speeds are high and the images are responsive. However, for the majority of students, their facial images were
minimally responsive and it was not possible to observe gestural nuances. Of course, eye contact is not
possible with online communication and it was almost impossible to establish non-verbal communication with
students when they were silent. Most boxes would evidence a blank stare and it was not possible to
differentiate whether students were concentrating on the classroom experience or drifting off thinking about
other matters. Of course, other visual cues concerning each student (grooming, posture, etc.) were extremely
limited as only faces dominated the visual field.”

Proponents of online social work education minimize these factors in both the synchronous and asynchronous
learning. Certainly each dimension of human communication—verbal, vocal, facial expressions and body
language—enhances interaction in different ways. Social workers learn to value each of these communication
channels. Further, we also consider the “person-in-environment”. As social workers carefully observe
contextual interpersonal data in home visits, family therapy sessions, or support groups, social work faculty
observe where students position themselves in the classroom: who sits in the front and who in the back, who
sits alongside whom, and who remains aloof from other students. Faculty sensitivity to the “student-in-
environment” models the educational task of understanding the “person-in-environment”.

Field Internships

The procedures involving field internships varied widely across programs. Some programs like University of
Southern California and University of New England have hundreds of students scattered across the United
States and even in foreign countries. The University of Southern California outsources the development of
these internships to the 2U Corporation who have staff whose job is to research internship opportunities in the
community of each incoming students and to recruit agencies. The 2U Corporation has advertised for off-site
clinical supervisors to provide clinical field supervision via video connections (see Appendix A). This implies
that they often are not able to find internships with appropriate field supervision, either in-house or in the local
community.

In contrast, the University of New England requires all students to develop their own internships in their own
communities. They provide training to student about how to do this and then contract with the agencies that
the students have found.
Other online MSW programs have a regional perspective and are more directly involved in developing field internships and maintaining relationships with these agencies. For example, Fordham University both excludes students who live within 50 miles from one of its campus locations and limits enrollment to students in the tri-state area that adjoins its central campus. They maintain field coordinators in each of these states who help develop placements and maintain relationships between the agency and the School. Similarly, Florida State University limits enrollment to students in specific counties in Florida, Georgia, Alabama and four states in the Great Plains.

Given the ubiquitous difficulties experienced by conventional MSW programs in developing and maintaining quality internships in their home communities, quality control of field experiences is invariably impacted when an online MSW program has to establish new placements in distant communities for many, if not most, enrolling students.

**Research on Online MSW Education**

There are a handful of research studies on online MSW education with specific classes (Faul, Frey and Barber, 2004; Siebert, Siebert and Spaulding-Givens, 2006; Banks and Faul, 2007; Cummings, Foels and Chaffin, 2013) but only two studies which examined the impact of the overall program (Wilke and Vinton, 2006; Cummings, Foels, and Chaffin, in press). Two studies, one from Florida State University and one from University of Tennessee, reported relatively similar learning outcomes between the campus-based and online programs.

To understand the significance of these studies, it is essential to understand the ways in which these online MSW programs diverged from the usual practices in online MSW education today. In the Florida State program, only students with advanced standing (BSW degrees) are admitted into their asynchronous online MSW course of study. And, unlike their campus-based advanced standing programs, the usual online course of study (at least at the time of this study) was a part-time six semester program, including four semesters of academic study and two semesters of field internship (Wilke and Vinton, 2006). The research study only examined the 32 students who graduated from the first two cohorts of this online program. While most of the comparison campus-based advanced standing students had received their BSW within a year of matriculating, the online group averaged 5-6 years post-BSW graduation and had twice as many years of human services work experience.

The advanced standing requirement in the Florida State online program guarantees that every student has had two years on-campus exposure to a social work curriculum as part of their BSW education and were personally known by members of the social work faculty, enabling the faculty to identify students who lacked the character, judgment and intellect to function in a professional capacity. This obviously involved considerable in-person interaction with social work faculty, fellow students and a field placement in the local community of their BSW program. Also, these online students’ additional 2.5 years of human services employment also contributes to their professional expertise and professional socialization.

In contrast, the University of Tennessee online MSW program, which began in 2008, is a complete MSW program that accepts both advanced standing (BSW) and non-BSW students for both full-time and part-time
study (Cummings, Foels, and Chaffin, in press). In this study, they compared 90 online students who graduated from the program in 2011 and 2012 with a larger cohort of on-campus students who graduated at the same time. As discussed previously, the Tennessee online program is a unique mixture of asynchronous, synchronous (real-time video) and campus-based portions of at least three practice or clinical courses. The exact number of hours involved in campus-based portions of these classes is not discussed in this research report, but another publication indicates that three four-hour Saturday sessions were required for participation in at group intervention course (Cummings, Fouls and Chaffin, 2013) Also, 30% of the online students in this cohort were advanced standing; as such, a significant portion of their social work education was on-campus.

Although the authors reluctantly acknowledged the value of these in-person contacts, they also noted that “WebEx, which allows both audio and visual interaction between and among instructor and students, and Second Life, which utilizes avatars to mimic interpersonal interactions, it may be possible to eliminate the need for face-to-face sessions when teaching clinical skills” (p. 78). Yet, it is difficult to identify the impact of these in-person contacts for developing relationships and professional identifications with faculty and fellow students.

It is worth noting that both the Florida State and Tennessee online MSW programs worked with relatively small student bodies and, thus, were able to more intensively develop appropriate field internship experiences for the large majority of their students who were within driving distance of their campuses. Both online programs had more students exposed to in-person contact with social work faculty and other social work students, via prior BSW education and on-campus classes. Also, neither university engaged in aggressive corporate marketing campaigns seeking hundreds of online MSW students. It is unknown whether comparable outcomes can be achieved when there is no synchronous or in-person interaction, prior BSW education, large numbers of geographically-scattered internships, or aggressive admissions recruitment campaigns.

Finally, neither study conducted any follow-up on its students. It should be noted that both studies were conducted by faculty of the programs that were studied; independent researchers do not appear to have been involved in the research design, data collection or data analysis. Given the huge financial pressures to expand online education, the need for independently-conducted research involving researchers with no interest in the findings of the research is essential. The lessons from research on psychiatric and other medications have taught us that economic factors have considerable impact on published research findings; the dissemination of biased findings, often by researchers with distinguished academic credentials, have cause significant injury to many individuals. Given the involvement of social workers in critical life situations involving health and mental health, the integrity of research concerning the development of competent and ethical social workers must be beyond reproach.

**Ethical Considerations**

The advent of online social work education raises a number of complex ethical issues. It is important to examine these issues in light of current ethical standards in the profession. The discussion below draws on standards in the NASW Code of Ethics and the International Federation of Social Workers /International Association of Schools of Social Work Ethics in Social Work, Statement of Principles; these source documents are cited in the CSWE Educational Policy and Accreditation Standards. Further, this discussion draws on standards in the Clinical Social Work Association Code of Ethics.

**Centrality of Human Relationships in Social Work**
The NASW Code of Ethics states explicitly, “Social workers recognize the central importance of human relationships.” Sherry Turkle, a Professor of the Social Studies of Science and Technology at the Massachusetts Institute of Technology who has studied the impact of technology on relationships, has noted: “Human relationships are rich and they’re messy and they’re demanding. And we clean them up with technology..... We short-change ourselves. And over time, we seem to forget this, or we seem to stop caring.” (Turkle, 2011).

Social workers have appreciated the complexities of human relationships for over a century, pioneering work with individuals, families and groups in the home, community and agency. Certainly, as David Brooks pointed out at the beginning of this report, “technical knowledge” can be gleaned online, but “practical knowledge” requires substantial human interaction. In social work, as much as any other field of professional study, the nuances of human relationships are essential, involving non-verbal, verbal, vocal, and contextual cues, which are highly limited in text-based communications and substantially diminished in real-time video interaction. In an online class, relationships between students are nearly impossible for faculty to discern and faculty modeling and socialization is greatly impaired.

When students are taught in-person, instructors can see and react to their facial expressions and such subtle nonverbal cues as whether eyes are focused on the instructor or looking away, hands are raised to contribute a point during an animated discussion, or whether facial expressions of quiet student convey engagement, confusion or irritation. Classroom discussions can continue in the hallway, cafeteria or offices with faculty or fellow students. And, of course, these in-person dialogues can also continue online via email, text or even video-chat. But these online interactions are greatly enriched if they are based on a foundation of a real-time, in-person relationship.

Social work educators know that classroom discussions provide regular, ongoing opportunities to observe students’ conduct and comportment; occasionally instructors note questionable behaviors in class—such as making inappropriate comments, eye rolling, leaving the classroom for extended periods of time, engaging in sidebar chats, and passing notes—that warrant attention. At times, social work educators who meet regularly as faculty members need to have confidential discussions among themselves to review student progress and develop plans to address and remediate concerns about troubling student conduct. Instruction offered exclusively online greatly reduces opportunities to observe, monitor, and address such “red flag” behaviors. This compromises social work educators’ ability to fulfill their ethically prescribed gate-keeping function. Online faculty members’ ability to confer with each other and compare notes about student progress—a regular occurrence in traditional brick-and-mortar social work education programs—is constrained when instructors are scattered geographically and do not have ongoing working relationships with each other.

**Integrity in Online Programs**

The NASW Code of Ethics highlights integrity as one of the six core values of the profession and states, “Social workers behave in a trustworthy manner.” According to the Statement of Ethical Principles adopted by the International Federation of Social Workers, “social workers should act with integrity” (statement 5.3). Further, the Clinical Social Work Association Ethics Code states that “clinical social workers maintain high standards in all of their professional roles, and value professional . . . integrity” (section I) and “public statements, announcements of services, and promotional activities of clinical social workers serve the purpose of providing
The personnel and websites of some online MSW programs claim their official transcripts are indistinguishable from transcripts from their university’s on-campus MSW program. This raises complex ethical questions about the extent to which online programs have an ethical duty to be transparent and forthright about how students earned their degrees (whether in face-to-face programs or online programs) so that potential employers and others can consider this information as they see fit. This is especially important given published studies citing employers’ lack of confidence in degrees earned online (see and http://chronicle.com/items/biz/pdf/Employers%20Survey.pdf and http://www.westga.edu/~distance/ojdia/spring121/columbaro121.html). All programs offering online MSW degrees and social workers with such degree should disclose this information to the public, honoring social work’s ethical standards for transparency. Notably, the American Psychological Association expects its clinical psychology programs “to clearly disclose to the public which aspects of their education and training utilize distance or electronically mediated delivery formats.” Social work should hold itself to the same standards of integrity.

**Conflict of Interest and Informed Consent in Online Education**

Some online social work education programs are rapidly expanding and the economic motives of many colleges and universities in expanding online offerings has been discussed at length. This has particularly been true in for-profit online programs. While, with the exception of a new, as yet unaccredited MSW program at Walden University beginning in Fall, 2013, the existing online MSW programs are all at “non-profit” traditional educational institutions, the largest programs all have partnerships with for-profit corporations which do much of the marketing and student recruitment for these programs. These partnerships raise important questions concerning conflict of interest and informed consent. CSWA could not find information about whether marketing corporations are being used to recruit MSW students for residence programs but found the use of such corporations to be a common practice in recruiting students for online programs. If this marketing practice exists for residence MSW programs, we would have the same concerns that we are expressing about this kind of recruiting for online MSW programs for the following reason: recruiters for educational programs have a conflict of interest, i.e., they have a vested monetary interest in getting as many students as possible to attend a given program. These recruiters are therefore not focused on making sure that potential students have complete information on the risks and benefits of enrolling in a given program and/or pursuing a career in social work.

Section 1.06 of the NASW Code of Ethics state that “social workers should be alert to and avoid conflicts of interest that interfere with the exercise of professional discretion and impartial judgment” and “should not take unfair advantage of any professional relationship or exploit others to further their personal, religious, political, or business interests”. While this language is primarily directed to worker-client relationships, the opening section of the Code of Ethics says the Code “is relevant to all social workers… regardless of their professional functions (and) the settings in which they work…” As such, in an increasingly entrepreneurial academic environment, the aggressive marketing practices of some online MSW programs must be carefully scrutinized.

These aggressive marketing practices largely emerge from the corporate partners of the social work schools and departments, not from the educational institutions themselves. 2U Corporation, the partner of the University of Southern California’s “virtual” MSW program, explicitly seeks “admissions counselors” on its website who have “an energetic and strategic approach to inside sales”, “a proven track record of successful
inside sales” and “1+ years sales experience”. Deltak, the corporate partner for Boston University, states that they want their “program managers”, the “first point of contact for prospective students”, to meet “specific student recruitment goals”. Similarly, Pearson Embanet, the partner of the University of New England wants “enrollment advisors” to have “Two to three years sales experience (in an outbound calling environment preferred)".

For these MSW programs with corporate partners involved in student recruitment and admissions, the potential student is informed about the online MSW program and guided through the admissions process by a corporate “admissions counselor”, not by a staff member of the social work school or department. As a result, the recruitment and admissions practices of the corporate partner are not covered by the transparent academic policies of the school or department itself, but are concealed by proprietary business interests. Nonetheless, these practices impact the “bottom line” of the social work school or department and, by extension, the larger academic institution.

However, we do know that the aggressive student recruiting practices of for-profit colleges have come under scrutiny and where highlighted by a 2012 report of a Senate Health, Education, Labor and Pensions Committee entitled “For Profit Higher Education: The Failure to Safeguard the Federal Investment and Ensure Student Success”. The Executive Summary of this report included the following observations about recruiting practices:

“Documents indicate that the recruiting process at for-profit education companies is essentially a sales process. Investors’ demand for revenue growth is satisfied by enrolling a steady stream of new student enrollees or “starts.” During the period examined, at many companies the performance of each person in the admissions chain, from CEO to newly-hired junior recruiters, was rated at least in part based on the number of students enrolled.”

“Documents demonstrate that in order to achieve company enrollment goals, recruiting managers at some companies created a boiler-room atmosphere, in which hitting an enrollment quota was the recruiters’ highest priority. Recruiters who failed to bring in enough students were put through disciplinary processes and sometimes terminated. Before a ban on incentive compensation was re-instituted in mid-2011, recruiters’ salaries at many for-profit colleges were tightly tied to enrolling a certain number of new students.”

“Internal documents, interviews with former employees, and Government Accountability Office (GAO) undercover recordings demonstrate that many companies used tactics that misled prospective students with regard to the cost of the program, the availability and obligations of Federal aid, the time to complete the program, the completion rates of other students, the job placement rate of other students, the transferability of the credit, or the reputation and accreditation of the school.”

“For-profit colleges seek to enroll a population of non-traditional prospective students who are often not familiar with traditional higher education and may be facing difficult circumstances in their lives. Recruiting materials indicate that at some for-profit colleges, admission representatives were trained to locate and push on the pain in students’ lives. They were also trained to “overcome objections” of prospective students in order to secure enrollments. Additionally, companies trained recruiters to create a false sense of urgency to enroll and inflate the prestige of the college.” (U.S. Senate, HELP Committee, 2012)
Apart from Walden University’s recent initiative, the online programs studied by CSWA are all non-profit academic institutions and thus do not “profit” from such recruitment and admissions policies in the usual sense. Yet, the question remains whether it is ethical for social workers involved in academia to “outsource” recruitment practices which would clearly be unethical if performed by the social workers themselves. As noted in the report, explicit “incentive compensation” was prohibited by the U.S. Department of Education in 2011, yet attorneys have “developed strategies to align performance appraisal practices and compensation systems that will assist colleges in complying with the Incentive Compensation ban.” (Mulcaly, 2011).

Certainly corporate ethical practices and social work ethical standards are not identical. But the implication of the job descriptions for admissions personnel at 2U, formerly 2tor, Corporation (funded by $96 million in venture capital), Deltak (a subsidiary of John Wiley and Sons which is listed on the New York Stock Exchange) and Pearson Embanet (a subsidiary of Pearson PLC, a British multinational corporation also listed on the New York Stock Exchange) suggest that all three firms appear to profit if more students are enrolled in these online MSW programs, regardless of whether it is in the student’s best interest. According to a recent article, corporate partners like Pearson Embanet, Deltak, and 2U can get about 50% of the tuition revenue from students, making the enabling business a potentially lucrative one”. The contractual arrangements between the social work schools and corporate partners are not public and, thus, we have no actual data on how these arrangements impact either corporate profitability or the school’s budgets.

CSWA encountered compelling examples of ethically questionable practices associated with recruitment of students to online MSW programs. CSWA recognizes that one cannot generalize from these examples, however they provide illustrations of troubling practices.

For example, one student interviewed by CSWA initially enrolled in an online MSW program which cost approximately $87,000 to complete her degree on a fulltime basis; after one semester in the online program, she became dissatisfied with the lack of personal contact with faculty and fellow students and transferred to a MSW program in a public university in her home town which charged only $11,000 in tuition for a comparable course of study. This student is a good example of someone who has experienced both online and residence programs with a basis for experiential comparison. After graduating with her MSW, she reported a much higher level of satisfaction with both the academic course of study and the field internship experience.

Another interviewed student in an online program received Veteran’s benefits to attend the online MSW program on a fulltime basis while also holding a fulltime job. Not surprisingly, he was unable to juggle both the MSW program, including an internship, and a fulltime job. When he, quite appropriately, considered withdrawing from the program, he learned that this would endanger his financial support and would require him to reimburse the government for the significant amount of his initial tuition support. None of this had been carefully explained to him by the “admissions counselor”.

It is highly likely that both of these students’ initial matriculation in an online program benefited the profit margin of the corporate partner that guided their admissions process. Also, it is quite possible that these admissions processes did not involve “high-powered sales tactics” and, thus, were not problematic from that standpoint of business ethics.

Yet, questions about the recruitment process of both could be raised by social work’s ethical codes. Section 1.03 of the NASW Code on Informed Consent says that “social workers should provide services to clients only
in the context of a professional relationship based, when appropriate, on valid informed consent. Social workers should use clear and understandable language to inform clients of the purpose of the services, risks related to the services, limits to services because of the requirements of a third party payer, relevant costs, reasonable alternatives…"

It is not unreasonable to conceptualize the process of enrolling a student in a program of social work education as requiring a “professional relationship” that requires “informed consent” regarding the “risks” (of not being able to work fulltime while enrolled, of having inadequate and hastily developed internships experiences, and of having an “online education”), the “requirements of third party payer” (loan programs or government grants), “relevant costs” (tuition) and “reasonable alternatives” (lower cost on-campus social work programs nearby). Social work programs that recruit and admit students without meeting this standard of “informed consent” could be viewed as ethically problematic.

Further, if faculty at the college or university are promoted or evaluated on the basis of meeting certain enrollment targets assisted by corporate sales practices that do not meet social work standards of “informed consent”, this would raise ethical concerns about conflict of interest.

It should be noted that some online MSW programs do not use corporate partners in their recruitment and admissions processes and, to our knowledge, even the campus-based MSW programs at these same institutions manage their own admissions processes without corporate partners who manage relationships with potential students. These programs “market” themselves on the basis of word-of-mouth and reputation in their local communities. As such, the opportunities for ethical conflicts are substantially reduced.

**Online Content in Clinical Psychology Programs**

Given the comparable professional responsibilities involved in social work and clinical psychology, CSWA reviewed the accreditation standards for clinical psychologists. The American Psychological Association’s (APA) Commission on Accreditation (CoA) acknowledges that “the growth of technology has increased the options for how instruction can be delivered”, but insists that “delivering education and training substantially or completely by distance education (in clinical psychology) is not compatible” with its accreditation standards. They state that: “This is because face-to-face, in-person interaction between faculty members and students is necessary to achieve many essential components of (its training standards) that are critical to education and training in professional psychology, including socialization and peer interaction, faculty role modeling and the development and assessment of competencies” (See Appendix D).

Graduate programs in clinical psychology, according to the APA’s Commission on Accreditation, delivering “any amount of distance education or utilizing any electronically mediated formats” are expected to specifically describe when and how such educational formats are used and to relate the use of such formats to specific accreditation standards. Further they offer specific guidelines in a number of important areas as follows: “Practicum experiences must be conducted face-to-face, in-person, and cannot be completed through distance education (i.e., virtual clients) or other electronically mediated education” and “All programs are expected to clearly disclose to the public which aspects of their education and training utilize distance or electronically mediated delivery formats” (Ibid).
The APA CoA also recognized that accredited graduate, internship and post-doctoral programs may utilize telesupervision (defined as clinical supervision “through a synchronous audio and video format where the supervisor is not in the same physical facility as the trainee”) of clinical practice in their program curriculum within specified limits. At the same time, their accrediting body recognized that: “There are unique benefits to in-person supervision. Benefits to in-person supervision include, but are not limited to: opportunities for professional socialization and assessment of trainee competence, recognition and processing of subtle, nonverbal and emotional or affective cues and interactions in supervision, all of which are essential aspects of professional development, ensuring quality, and protecting the public. (Ibid)”

The APA CoA requires in-person supervision in the student’s first practicum experience and only permits telesupervision when the graduate program can “ensure that the student has had sufficient experience and in-person supervision in intervention at the doctoral level and possesses a level of competence to justify this modality of supervision in his/her sequence of training.” Even then, telesupervision is only allowed to comprise no more than 50% of total supervision at a given practicum site. Beyond that, all accredited clinical psychology programs that use “telesupervision” are expected to have “an explicit rationale for using telesupervision”, and policies which determine “which trainees can participate in telesupervision”, how an “off-site supervisor maintains full professional responsibility for clinical cases” and “how non-scheduled consultation and crisis coverage are managed”.

As the professional responsibility for graduate social workers is highly comparable to that of clinical psychologists, the APA accreditation guidelines (found in Appendix D) for the judicious use of online and distance learning technologies seem highly relevant to graduate education in social work.

**Recommendations for CSWE on Distance Learning Programs**

CSWA acknowledges that the growth of technology has increased the options for how social work education can be delivered. However, as clinical social workers, we also understand that our profession’s emphasis on the centrality of human relationships and the “person-in-environment” requires our profession’s students to have substantial face-to-face, in-person interaction with both faculty and fellow students in their graduate education. This in-person interaction facilitates socialization and peer interaction, faculty role modeling, and the development and assessment of professional competencies. We agree with the Council on Social Work Education’s Standards that emphasize “critical thinking augmented by creativity and curiosity… (which require) the synthesis and communication (bold added) of relevant information … (by social workers who can) demonstrate effective oral and written communication in working with individuals, families, groups, organizations, communities, and colleagues.”

Further, we strongly endorse the CSWE’s standards concerning the “implicit curriculum” in graduate social work education which emphasizes “the culture of human interchange; the spirit of inquiry; the support for difference and diversity; and the values and priorities in the educational environment.” This is especially relevant when understanding the importance of a commitment to exploring diversity issues in graduate education which, according to CSWE, must be“reflected in its learning environment”, an objective which is nearly impossible in asynchronous learning and severely impaired in synchronous, video “classrooms”.

As such, CSWA recommends that all MSW education must be substantially or completely delivered in an in-person learning environment and that distance or online education be limited to a supplemental or adjunctive
role within these graduate programs. We recommend that CSWE develop specific guidelines for the use of online or distance components within MSW programs which include:

- Clear descriptions of all program elements and courses that use distance or online delivery formats with an explicit rationale given for the appropriateness of such formats in relation to educational content
- Require all internship experiences to be conducted face-to-face in in-person settings
- Require that all required internship supervision be conducted face-to-face by a social worker personally familiar with the agency and community
- Require all MSW programs to clearly disclose to the public which aspects of their education and training utilize distance online delivery formats
- Practicum experiences must be conducted face-to-face, in-person, and cannot be completed through distance education (i.e., virtual clients) or other electronically mediated education
- Telesupervision of students within practicum experiences is governed through a separate implementing regulation
- All programs are expected to follow generally accepted best practices and utilize evidence-based methods in distance education and electronically mediated delivery

Summary

In our study of the current state of distance MSW education, we encountered dedicated social work educators who were working diligently to teach students in an online environment. That said, the MSW degree enables its recipients to practice in a highly challenging environment with clients with diverse backgrounds and difficulties. Social workers, especially clinical social workers, must develop empathic skills, conduct biopsychosocial assessments and diagnoses, and form durable helping relationships. While a professional education in social work can incorporate some online components, the substantial portion of a social work education, both in class and internships, must be delivered in an in-person, face-to-face environment with faculty and fellow students.

Further, the practice of many online programs in establishing field internships away from their campus locations without intensive study of the agency and communities is fraught with difficulties. Worthwhile internship experiences require a close working relationship between the school or department, the field supervisor and the agency. When large numbers of such placements are developed every term by staff unfamiliar with the agency or communities, attention to the learning needs of students is inevitably compromised.

Also, we are highly concerned about the corporate partnerships that some online MSW programs have developed, especially in regards to student recruitment and admissions. Sales marketing approaches have no place in social work education and raise a conflict of interest for schools that use such approaches, either directly or via corporate partners. There is ample evidence that such marketing by for-profit entities entices students to enroll in programs that they cannot afford or complete. Any participation in such practices raises significant ethical questions for social work institutions. Further, we are especially concerned about CSWE-accreditation of MSW programs sponsored by for-profit educational institutions.
CSWA sympathizes with the financial pressures that all social work schools and departments are facing to maximize revenue and student enrollment. We also sympathize with the needs of students to complete a professional education and receive a professional degree with a minimum of inconvenience. However, social work is a demanding profession and an adequate basic educational experience requires the time and effort invested in a campus-based education.

CSWA is concerned about the impact that these changes will have on the capacity of social workers to learn and practice social work in a highly competent and ethical manner. Lack of direct contact between students, faculty, supervisors, and clients all create potential barriers to the development of social work expertise. The use of corporate ‘partners’ to market distance learning programs to students and find practicum placements has grown as well. Evaluating potential students who are interested in distance learning programs is a different process from evaluating students for residence programs; the reasons for such differences have not been fully explained. The costs of some distance learning programs seem high, considering the lower costs involved in providing distance learning. CSWA strongly recommends that CSWE, the accrediting body for social work higher education, develop rigorous standards for these programs to ensure the goals of social work higher education remain in place.

CSWA believes that distance learning has a role in 21st century graduate social work education. Distance learning technologies can enable students to benefit from some interaction, via text or video, with faculty and other students, and these technologies are commonly used today in conjunction with in-person learning. However, these technologies should only augment in-person graduate social work education. The difference between the maturation of social work professional expertise that depends heavily on in-person contact and the mere absorption of academic content, which can occur to some extent online, is a critical issue in the MSW education of competent and ethical social workers. Finding the adequate proportions of these ingredients in the educational process will be a continuing challenge for our profession.

Bibliography


Appendix A

Number of Online Students

- Boston University – 160, expanding to 300
- Case Western University – in development
- Florida State University – 120 students, only “advanced standing” students with BSW
- Fordham University – 25 students, plan to expand
- Rutgers University – unknown
- University of New England – 800
- University of Southern California – 1500 currently, expanding to 2000
• University of Tennessee – 150

**Asynchronous/Synchronous Coursework**

Boston University – All classes are 7 weeks; one hour weekly of synchronous instruction in each class (7 hours per course); remainder is asynchronous

Case Western University - unknown

Florida State University – all asynchronous, moving toward some ‘lab’ days of synchronous

Fordham University – all asynchronous

Rutgers University – all asynchronous for all online; two years asynchronous for blended online, one year in-person

University of New England – all asynchronous

University of Southern California - each class has 75 minutes weekly of synchronous instruction; remainder of each class is asynchronous

University of Tennessee – unspecified amount of synchronous interaction; three practice/clinical classes require participation in 2-3 Saturday on-campus workshops.

**Amount of Direct Contact with Faculty**

Boston University – seven hours (one class) of synchronous contact per week

Case Western University – unknown

Florida State University – none in classes, moving toward ‘lab’ days of synchronous classes

Fordham University – none in classes

Rutgers University – unknown

University of New England – none on regular basis

University of Southern California – 75 minutes weekly of synchronous instruction in each course

University of Tennessee – unspecified amount of synchronous interaction; three practice/clinical classes require participation in 2-3 Saturday on-campus workshops.

**Student Locations**
Boston University – anywhere in USA outside the 128 corridor

Case Western University

Florida State University – rural underserved areas in FL, NE, WY, and AL

Fordham University – in New York, Connecticut and New Jersey at least 50 miles from any of Fordham’s three campuses

Rutgers University – selected states for all online program

University of New England – every state and 10 other countries

University of Southern California – all states except New Hampshire, some regional centers, e.g., Texas

University of Tennessee – outside 25 mile radius of Knoxville or Nashville

**Practicum Choices**

Boston University – no placements in I28 corridor

Case Western University – unknown

Florida State University—student enrollment limited to specific states and counties where FSU has field faculty and agency affiliations

Fordham University – same as residence placements

Rutgers University – developed by field coordinators in location of students

University of New England – start after 3rd semester, field ‘advisor’ in community of student, currently @50 – one 1000 placement if prior human services experience, two 600 hour placements if not

University of Southern California – developed by advisor, evaluated by USC faculty all around country

University of Tennessee – residence field placements in location of student

**Practicum Oversight**

Boston University – field advisors find practicum placements, visit students onsite and evaluate placements

Case Western University – unknown
Florida State University – match students and placements in areas served through field coordinators

Fordham University – faculty coordinators who work with field supervisors

Rutgers University – field coordinators who work with students and placements

University of New England – oversight by community ‘advisor’ – students must find own placement – some supervision by video

University of Southern California – some supervision by video, prefer LCSWs with 2 years experience, one hour of weekly supervision

University of Tennessee – developed by UT through other SSWs in the area of student – may hire field instructors as adjunct faculty – overseen by residence field coordinators

Use of Videoconferencing for Practicum

Boston University - no

Case Western University – unknown

Florida State University -- no

Fordham University – no

Rutgers University - no

University of New England – considering

University of Southern California – beginning Fall, 2013

University of Tennessee - no

Use of Corporate Partners

Boston University - Deltak

Case Western University – Pearson Embanet

Florida State University - none

Fordham University – unknown

Rutgers University – CollegeQuest
University of New England – Pearson Embanet

University of Southern California – 2U Corporation

University of Tennessee - none

Cost of Online Programs

Boston University – $48,425 (including technology fee)

Case Western University – $77,180

Florida State University – $20,000-24,000 for four quarters

Fordham University – approximately $56,694 to complete MSW

Rutgers University – unknown

University of New England – $56,195

University of Southern California – $87,074 full-time; $90,610 for part-time over 3 years

University of Tennessee – in-state residents@$25,000 for four semesters; out-of-state residents=@$57,000 for four semesters

Appendix B

Current list of 20 CSWE MSW Distance Learning Programs, some of which are hybrid programs, some of which are entirely online (retrieved from http://www.cswe.org/cms/39516.aspx on July 31, 2013).

- Boston University (MA)
- California State University, Long Beach (CA)
- Edinboro University of Pennsylvania (PA)
- Florida State University (FL)
- Fordham University (NY)
- Humboldt State University (CA)
- Indiana University (IN)
- Michigan State University (MI)
- Our Lady of the Lake University (TX)
- Rutgers University (NJ)*
- Salisbury University (MD)
- Texas State University-San Marcos (TX)
- University of Denver (CO)
The purpose of this survey is to collect data on MSW programs which are being offered partly or totally online. CSWA will be surveying approximately 10-15 schools and will share the information collected with participants.

I. Program Overview

1. When did your program start and how has it evolved?
2. What are the general parameters of your program?

Can students do their MSW 100% online or is some residence “on campus” required?

If the latter, what are the expectations?

Do you offer classes that can only be taken online or only taken in residence?

Are there any differences in the length of semesters or other arrangements between online or in residence programs, including full-time or part-time programs?

Are there intensive classes in one-month modules in addition to full semesters?

*added separately
3. How many students are in your “in residence” programs and how many in “distance” programs?

How many students were admitted to each program in the last 12 months?

How many students graduated from each program in last 12 months?

Are there plans to increase or decrease the size of either program in the next two years?

II. Course Content

Is there any difference between the course content in the online courses and those in residence?

If so, what are the differences?

III. Course Procedure

1. Do the “online classes” have real-time video conferencing with the class, non-video assignments, or some mixture?

Is there classroom content through the internet through video or audio lectures, power points, etc.? Please describe.

2. If video conferencing classes, what is the duration of the sessions? Is this the same duration as the same classes in residence? If not, why are durations of the classes different?

3. How are students evaluated, i.e., through written assignments, quizzes, exams? If the latter two, are these examinations “proctored”?

4. What percentage of online courses are taught by fulltime faculty versus adjunct instructors?

IV: Field Internships

1. Where do you offer field internships, in the locale of the school or nationwide?

2. Are these internships commonly developed in advance of student matriculation (as in conventional MSW programs) or are they usually developed uniquely as each student enters the program?

3. What is the process for developing new placements?

If not in your locale, how are potential placements identified?

Who contacts the agency or institution?

Is the agency visited by a faculty member of the SSW?
Are agencies affiliated with the “in residence” MSW programs visited by faculty?

Is the development of the placements in the online/distance program different in any way from the development of placements for “in residence” students?

4. If your MSW program is developing large numbers of new placements outside your campus community, given the common problems conventional MSW programs have finding appropriate internships in their own communities, do you ever have difficulties or delays in establishing placements in communities outside the area of the school?

5. How do you evaluate the suitability of agency field supervisors?

What are your expectations of these supervisors, i.e., credentials, time, reports, orientation to school policies, etc.?

Do you ever have agency field supervision provided by supervisors who are not employed by the agency?

If so, how is this supervision arranged, e.g., by locating non-agency supervisors through in-person meeting or phone or video conference?

6. What is your process for monitoring field placements?

Do you have field faculty visit the student and agency in placement?

What are the protocols for monitoring and assessing student progress?

7. Do any students treat clients via “skype” or similar internet technology? If so, please describe.

For students who do this, what percentage of their client contact is via skype-like servers?

V. Admissions

1. Are there any differences in the admissions standards, policies or processes for online versus in situ applicants?

Would every student accepted into the online program be accepted into your residential program, or vice versa?

If a student was accepted into your online program decided before matriculation that he or she wished to study “in residence”, would he or she have to reapply?

Can a student transfer in the middle of an MSW program between the online and residential programs (in both directions)? If not, what would be the issues or needed procedures?
2. Do you accept students in your community into your online program?

What percentage of students in your online program live within 50 miles of your campus?

3. Is there any difference in cost between your online and residential MSW programs?

Approximately what is the tuition cost for completing a MSW in both in residence and online programs?

Miscellaneous:

1. Do you have any data on student retention/completion in your online program?

How does this compare to student retention/completion for in residence programs?

Of the students who start an online program, what percentage complete one full semester? Two full semesters? Graduate? How does this compare to in residence students?

2. Are students in the online programs entitled to all student services of residential programs, e.g., health center, student health insurance, mental health counseling, etc.?

3. Do you have any corporate partners with your online program?

What are their responsibilities for technical support, admissions, development of field internships, and so on?

Appendix D

American Psychology Association Commission on Accreditation Standards for Online Education

C-27. Distance and Electronically Mediated Education in Doctoral Programs (Commission on Accreditation, July 2010)

The APA Commission on Accreditation (CoA) is recognized as an accrediting body by both the U.S. Department of Education and Council of Higher Education Accreditation. The CoA’s recognized scope of accreditation does not include distance education. However, the CoA understands that the growth of technology has increased the options for how instruction can be delivered within psychology doctoral programs. Traditional methods of teaching and interaction in the same time and place are no longer the only available approach to instruction. The CoA recognizes that some accredited doctoral programs may elect to utilize distance and electronically mediated delivery formats in a supplemental or adjunctive role within their programs.

The CoA defines distance and electronically mediated education in the following manner, consistent with definitions from the APA Task Force on Distance Education and Training in Professional Psychology (June 2002, page 4) as well as definitions specified by other higher education accreditation organizations.
Distance education is defined as a formal educational process in which the majority of the instruction occurs when student and instructor are not in the same place. Instruction may be synchronous (students and instructors present at the same time) or asynchronous (students and instructors access materials on their own schedule). Distance education may employ correspondence study, or audio, video, or computer technologies.

Electronically mediated education covers a wide set of electronic applications and processes such as Web-based learning, computer-based learning, virtual classrooms, and digital collaboration. It includes the delivery of content via Internet, intranet/extranet (LAN/WAN), audio and videotape, satellite broadcast, interactive TV, and CD-ROM.

Although the Guidelines and Principles for Accreditation of Programs in Professional Psychology (G&P) do not set a pre-determined limit on the extent of distance education that is permitted, a doctoral program delivering education and training substantially or completely by distance education is not compatible with the G&P and could not be accredited. This is because face-to-face, in-person interaction between faculty members and students is necessary to achieve many essential components of the G&P that are critical to education and training in professional psychology, including socialization and peer interaction, faculty role modeling, and the development and assessment of competencies.

The following elements are specifically noted for all accredited and applicant doctoral programs:

- Practicum experiences must be conducted face-to-face, in-person, and cannot be completed through distance education (i.e., virtual clients) or other electronically mediated education;
- Telesupervision of students within practicum experiences is governed through a separate Implementing Regulation;
- All programs are expected to follow generally accepted best practices and utilize evidence-based methods in distance education and electronically mediated delivery;
- All programs are expected to clearly describe to the CoA in their self-studies which aspects of their education and training utilize distance or electronically mediated delivery formats; and
- All programs are expected to clearly disclose to the public which aspects of their education and training utilize distance or electronically mediated delivery formats.

Programs delivering any amount of distance education or utilizing any electronically mediated formats are expected to describe to the CoA how they meet all standards of the G&P, as is true of all programs that are accredited or are seeking accreditation. In their self-studies, such programs are expected to pay particular attention as to how distance or electronically mediated delivery is related to ALL parameters of the G&P (italics added).

C-28. Telesupervision
(Commission on Accreditation, July 2010)

The CoA recognizes that accredited programs may utilize telesupervision in their program curriculum. At the same time, the CoA recognizes there are unique benefits to in-person supervision. Benefits to in-person supervision include, but are not limited to: opportunities for professional socialization and assessment of trainee competence, recognition and processing of subtle, nonverbal, and emotional or affective cues and interactions in supervision, all of which are essential aspects of professional development, ensuring quality, and protecting
the public. Therefore, the CoA recognizes that there must be guidelines and limits on the use of telesupervision in accredited programs.

The following applies only to the MINIMUM number of required hours of supervision. At the doctoral level, these are the minimal supervision requirements for each practicum site, as defined by the doctoral program. Supervision beyond the minimum number of required hours may utilize methods or modalities that are deemed appropriate by the accredited program. Nothing in this Implementing Regulation contravenes other requirements in the Guidelines and Principles for Accreditation in Professional Psychology (G&P). It only clarifies the utilization of telesupervision at the doctoral practicum, internship and postdoctoral levels.

**Definitions:**

Telesupervision is clinical supervision of psychological services through a synchronous audio and video format where the supervisor is not in the same physical facility as the trainee.

In-person supervision is clinical supervision of psychological services where the supervisor is physically in the same room as the trainee.

Programs utilizing ANY amount of telesupervision need to have a formal policy addressing their utilization of this supervision modality, including but not limited to:

- An explicit rationale for using telesupervision;
- How telesupervision is consistent with their overall model and philosophy of training;
- How and when telesupervision is utilized in clinical training;
- How it is determined which trainees can participate in telesupervision;
- How the program ensures that relationships between supervisors and trainees are established at the onset of the supervisory experience;
- How an off-site supervisor maintains full professional responsibility for clinical cases;
- How non-scheduled consultation and crisis coverage are managed;
- How privacy and confidentiality of the client and trainees are assured; and
- The technology and quality requirements and any education in the use of this technology that is required by either trainee or supervisor.

**Guidelines and Limits:**

Doctoral programs: Telesupervision may not account for more than 50% of the total supervision at a given practicum site, and may not be utilized until a student has completed his/her first intervention practicum experience. Furthermore, it is the doctoral program's responsibility to ensure that the student has had sufficient experience and in-person supervision in intervention at the doctoral level and possesses a level of competence to justify this modality of supervision in his/her sequence of training.

Internship programs: Telesupervision may not account for more than one hour (50%) of the minimum required (as defined in the G&P) two weekly hours of individual supervision, and two hours (50%) of the minimum required (as defined in the G&P) four total weekly hours of supervision.
Postdoctoral programs: Telesupervision may not account for more than one hour (50%) of the minimum required (as defined in the G&P) two weekly hours of face-to-face supervision.

Programs that utilize telesupervision are expected to address generally accepted best practices. Furthermore, as with all accredited programs, programs that utilize telesupervision must demonstrate how they meet all domains of the G&P.