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January 4, 2016

Dr. Charles Jacob, Chair Pennsylvania Association of Counselor Education & Supervision PO Box 8222 Philadelphia, PA 19101-8222

Dear Dr. Jacob,

My Eastern University colleagues and I want to thank you for your work as PACES chair. Several of us attended the division meeting at Penn State in November and were encouraged by the open discussion you led on accreditation matters. You had asked for written comments as the association considers next steps on this. Below are a few thoughts we wish to share on why we urge PCA/PACES to consider inclusive language in any position taken on accreditation.

1. Not all programs can afford CACREP accreditation.

For example, some programs are small and do not have 3 core full-time faculty CACREP requires, but rather share faculty across more than one program. Moreover, some programs do not have sufficient personnel or budget to undergo CACREP's accreditation process, but may still be very robust counselor preparation programs.

2. Many faith-based institutions have hiring practices that already limit the pool of qualified faculty and cannot further restrict to comply with CACREP's prescriptions.

For example, many faith-based institutions require faculty to affirm a doctrinal statement. CACREP's urging that core faculty hold doctoral degrees in Counselor Education (CACREP-approved preferred) adds further restriction. Were we at Eastern to pursue CACREP accreditation, we would need to eliminate from consideration many *highly qualified* faculty who could support our mission but do not have the doctoral degree in Counselor Education, thereby seriously constricting our applicant pool.

3. Many counselor education programs embrace an inter-disciplinary approach, seeing this as a significant strength, and question CACREP's more exclusionary stance.

For example, our own department at Eastern University supports 3 masters programs, 2 in counseling (Clinical and School) and one in School Psychology. While we affirm the uniqueness of counselor identity, roles, and functions, nevertheless, we also recognize how the counseling field builds upon contributions of psychology and other mental health disciplines, and that ultimately our students will work alongside practitioners from many disciplines. Accordingly, our students are trained by instructors with diverse professional training and credentialing. The learning objectives/activities are clear in our courses (which maintains the integrity of each program's identity), and the faculty who teach are hired based on their competency in the content and skills to be taught. Over the years, our students have benefited from the expertise of professional counselors, psychologists, marriage & family therapists, behavior analysts, social workers, nurses, and psychiatrists. We know our students' education is enriched by this diversity of professional background and expertise, and we sought an accrediting body that would support this.

4. Many counselor education programs seek MPCAC accreditation, which *also* is committed to accrediting high quality counseling programs.

We have done so for our two counseling programs and underwent a rigorous review process in 2014. We've found MPCAC's standards commensurate with established scope and practice for the counseling profession and believe it actually exceeds CACREP's standards in a number of areas. Furthermore, we believe its mission to be more in keeping with the mission of our university and counseling programs.

While we support our colleagues who embrace CACREP, we ask that PACES (and PCA) would also support those of us who have pursued an alternative accreditation which is, in our view, more affordable, inclusive, and in keeping with the distinct mission of our programs and institutions. If a committee is formed in PCA on accreditation issues, we urge that it include representatives from all PCA divisions and chapters in order to invite the voices of the entire membership.

Sincerely,

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cc: Dr. Paul Datti, President
Pennsylvania Counseling Association