A Brief History of the Student Record

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Abstract

This paper provides a brief history of the development and evolution of the student record. It argues that this history is best considered as generally consisting of three distinct periods: (1) an early period (1840-1910) that was characterized by large variation in student record keeping and a lack of defined relationships and hierarchy among educational institutions and levels. Uniformity in student record keeping—particularly with the adoption of the Carnegie Unit—became a way of solidifying practices of record keeping but also of institutional status and belonging; (2) a period of rapid expansion of higher education (1910-1970) in which postsecondary institutions had to address the record keeping challenges posed by incorporating new kinds of students, new kinds of institutions, and new patterns of course taking and degree seeking; (3) the modern period (1970-Present) that was characterized both by the continued evolution of the postsecondary sector in terms of new institutions, programs, and types of learners and by new external demands placed on university recording keeping by student privacy and public accountability concerns. Cutting across each of these three periods are questions concerning which institutions may legitimately inscribe on the student record; what information, experiences, and achievements should be recorded; the reciprocal obligations among institutions that maintain student records; and the proper role of educational institutions, non-profit organizations, and governmental entities in addressing these issues.[1]

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[1] A version of this paper was presented at the Asilomar II Convening on Student Data and Records in the Digital Era, held June 15-17, 2016. The conference website is available at https://sites.stanford.edu/asilomar/.

"We shall continue to be in the twilight, though not altogether in the dark, until a practicable method can be devised for keeping a separate record throughout his school course of each individual pupil, whether he remain in one school or follow the widespread American custom of migration." -U.S. Commissioner of Education E.E. Brown, 1911 [2]

Introduction

The idea of a student's "permanent record" has become an inextricable part of both the cultural imaginary of school life (as in the Violent Femmes' immortal lyric[3]) and the organizational reality of school administration everywhere. Now understood to encapsulate some combination of school attendance, academic achievement, and behavioral shortcomings, the student record, as Commissioner Brown's lament makes clear, is of relatively recent vintage.

Though a newcomer in the history of American education, it has become embedded in the expectations and work of people at all levels: students expect their past attainments to be honored and their academic credits to transfer from school to school; administrators expect to receive not only students but transcripts, test scores, and health records; and state and federal officials expect to receive regular updates on the aggregated educational status of various categories of students at all levels of the school system. Though this information—and the systems that produce it—has become part of the core infrastructure of our education system function, like so much of the American education system, it was not the product of a grand design or even a chief architect.

Rather, as this brief history of the student record will try to illustrate, the student record—in form and content—is the product of an on-going series of compromises played out over many decades across multiple institutions, organizations, and locales. Therefore, to think about the student record is to think about a complex and overlapping jurisdictional space that students move through as they receive their education from a variety of different educational institutions, at a variety of attainment levels, in a variety of places. This space is governed by negotiations between and within these educational sectors, these sectors and the state, and these sectors and the students they serve—and the student record a permanent record of those treaties. Thus, to view the student record historically, is, in many respects, to view the compromises that helped give shape to the

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[2] E.E. Brown, Transmittal letter for Strayer, *Age and Grade Census of Schools and Colleges,* Bulletin, 1911 No. 5.

[3] "I hope you know this will go down on your permanent record", Violent Femmes, "Kiss Off" (1983).

educational system, its institutions, its functions, its academic currencies, and its charges.

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Though even the originator of the phrase has grown weary of the term,[4] the student record does seem like the boundary object *par excellence*—providing the kind of basic structure to make complex organizational work possible while providing the flexibility to make local variation possible and subsequent renegotiation and re-codification all but inevitable. It is certainly in this spirit—renegotiation, re-imagination—that this convening was called.

Though operating within the time-honored tradition of academic self-governance and institutional coordination, it must be said that this convening sets itself no small task. Given the student record's location within the education system, it is only a slight exaggeration to say that a convening that seeks to *re-imagine* the student record also sets itself the task of re-imagining fundamental aspects of the education system: the definition of a student; the definition of educational achievement; the currency of achievement and the institutions that can issue it.

Given the scope and potential enormity of this task, it seems appropriate to consider, briefly, the history that produced the student record in its current form. This history is offered up not because it provides clear "lessons" or an obvious path forward, but in the hope that it can provide the kind of background necessary to understand the considerations and compromises that produced our current records; to illuminate the overlapping and expanding demands on, and interests in, student records; and to help delineate the genuinely new challenges from the chronic problems so that we might evolve the student record forward in the most productive way.

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[4] S. Leigh Star, "This Is Not a Boundary Object: Reflections on the Origin of a Concept," Science, Technology & Human Values 35, no. 5 (2010): 601–17.

The paper proceeds in two major parts examining: (1) the period from the early common schools up through World War I, when high schools and colleges were just beginning to shift from a confederation of independent institutions into a unified educational system—a common language; a mutual recognition of institutional types; and clear delineations among system levels; (2) the period roughly from World War II through the 1980s when higher education grappled with the challenges in recording keeping attending to large changes in the number and kind of institutions, the kinds of educational programs, and the kind and number of students served. The paper concludes with a brief consideration of the most recent challenges to student records systems including the new demands placed on them by technological interconnectivity, privacy concerns, and political accountability pressures. Running across these periods are several major themes that mark—no pun intended—the history of the student record: the reciprocal obligations inherent in record keeping be they to taxpayers, families, or subsequent educational institutions; the balance of maintaining institutional autonomy and programmatic innovation in a system increasingly defined by its interconnectedness; the challenges of integrating new kinds of programs, forms of learning, and types of students while maintaining coherence and coordination across the higher education sector. In all cases the student record—what was recorded and by whom—became central issues in the on-going evolution of American higher education.

The Common School & Uncommon (Child) Accounting (1840-1910)

Though by the mid-19th century American educators had succeeded in creating a system of common schools, they had not succeeded in establishing common school records or common definitions of schools. The decentralized responsibility for providing education to the youth of a town had produced a menagerie of school types that defied the clear categorical distinctions—elementary, middle, high, postsecondary—that we are accustomed today. The idiosyncrasies in school types and organization was paralleled by complete lack of uniformity in the maintenance of school records.

In 1839, Massachusetts Secretary of Education and common school evangelist Horace Mann complained that while the state took great pains to pass laws detailing "pages of minute regulations and formidable penalties, commissions various grades of officers, so that the fact of every missing gun-flint and priming wire may be detected, transmitted, and recorded among its archives," it had no similar system in the common schools. [5] In Mann's view the state had "no means of ascertaining how many of its children are

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[5] Horace Mann, *Common School Journal*, September 2, 1839.

deserters from what should be the nurseries of intelligence and morality."[6] Despite Mann's complaints, Massachusetts was relatively unique in keeping track of even those children who *did* decide to report for school. Most of this record keeping—the "school census" as it was referred to at the time—stemmed not from the pedagogical or organizational needs of schools but rather the administrative demands of the state. As in many states, Massachusetts made public funds available to cities and towns that made the decision to establish schools for local children. Eligibility to receive state funds was conditional, in Massachusetts and several other states, on a town reporting the *number* of school children enrolled in public and private schools to the state.[7]

Several decades later, when schooling moved from a voluntary to a compulsory enterprise, states like Massachusetts required that towns report not only the number of students enrolled in schools but the total number of school-aged children living there.[8] Though it varied from state to state, in many cases even when school census laws were passed they tended to emphasize the collection of aggregate numbers of children attending or "deserting" from school rather than the names and ages of individual school children. In Massachusetts, for example, it was not until 1898—46 years after the state first passed a compulsory school law—that the state required a census containing the names and ages of school aged-children.[9] Even when individual names were kept, the censuses were considered only yearly snapshots of school attendance and few districts maintained them in any cumulative, longitudinal way.

Still, the production of even aggregated school district statistics began to generate increasing interest in the use of these data to compare the relative quality and efficiency (terms often used synonymously) of school districts. School administrators and state officials, however, quickly learned that while they had developed a mutual interest in school statistics they lacked both shared definitions and uniform methods of calculating these numbers. Among the most notoriously meddlesome statistics was average school attendance—considered the gold standard of evaluative metrics. Though seemingly straight-forward, the rub in producing this statistic was how to count students who had disappeared and stopped attending school.

Following the so-called "Chicago Rule" many districts adopted the practice of dropping a student from the attendance roles whenever a student had been absent had been absent

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[6] Ibid.

[7] Paul Henry Neystrom, *The School Census* (University of Wisconsin--Madison, 1910), 14-18.

[8] The link between the systematic school census and compulsory school laws is inextricable. See, for example, Leonard Porter Ayres, Child Accounting in the Public Schools (Philadelphia: William F Fell Company Print Press, 1915).

[9] Massachusetts Acts and Resolves (1898), Chapter 496, Section 13-17.

more than five consecutive days. That much was simple enough, divergent interpretations cropped up around whether, after the five days, the student should be retro-actively dropped from the denominator of enrolled (and absent) students. Stories abounded about the abuse of these rules by students who, committing themselves always to absences of no less than five days, were recorded in the school statics as having a "perfect" attendance record.[10] Likewise, there were districts that, during the Spanish Flu epidemic in 1918-19, managed to record an *increase* in average attendance despite a sharp drop in "enrolled" students.[11] According to investigations at the time, districts could expect an 11% swing in its average attendance numbers depending on how it chose to define student attendance—that is, assuming it was committed to accurate record keeping at all, which, given the financial stakes involved, was not always the case.[12]

These sharply differing approaches, and the misleading statistical comparisons they invited, begat calls from prominent schoolmen to bring greater coherence to the nascent discipline of "student accounting." Given the weak position of federal officials and strong defense of local control, the responsibility fell to professional organizations and professors to achieve this. Indeed, the issue of creating a uniform records system was discussed at 22 of the 35 meetings of the National Education Association (NEA) from 1877-1912.[13] These calls resulted in the creation of the Committee on Uniform and Reports, which issued its final report and recommendations in 1912.[14] Urging his colleagues to take seriously the recommendations of the committee, Payson Smith, State Superintendent of Public Schools in Maine, admonished his colleagues, "If my school reports are to be useful to you and yours to me, then on certain fundamental points of common experience we must speak to each other in the terms of a common language."[15] Attempting to head-off potential objections, Payson added, "Such uniformity as may be implied in this general adoption of forms or general use of suggested tables is by no means incompatible with originality in report-making...the manner of their presentation and interpretation to the public will constitute a constant challenge to the skill and ingenuity of the superintendent."[16] Payson's reassurance here is revealing of the extent to

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[10] "National Education Association Proceedings" in *Circulars of Information, No. 1, Department of Superintendence* (January 29, 1874), 23.

[11] Arthur B. Moehlman*, Child Accounting; a Discussion of the General Principles Underlying Educational Child Accounting, Together with the Development of a Uniform Procedure* (Detroit: Friesema Bros. Press, 1924), 76, fn.1.

[12] Ibid., 21; See also: Paul Henry Neystrom, *The School Census*.

[13] Arch Oliver Heck, *A Study of Child-Accounting Records* (Columbus: The Ohio State University, 1925).

[14] National Education Association of the United States. Committee on uniform records and reports., *Final Report of the Committee on Uniform Records and Reports to the National Council at the St. Louis Meeting,* (Washington,: National education Association, 1912).

[15] Ibid., 47.

[16] Ibid., 47.

which superintendents viewed themselves as rulers of their own fiefdom—displaying their abilities through originality and ingenuity—rather than as members of a profession that governed a system of public schools: individuality was a mark of distinction and standardization a potential threat.

The upshot of the Committee on Uniform Records and Reports was not, in fact, uniform records or definitions. But it did mark the beginning of a more serious efforts to systematize and streamline these efforts. Among the most effective strategies for achieving this systematization was the production of uniform blank record forms that could be printed in massive quantities and distributed for use by the appropriate educational authorities. Given the various local and state level laws concerning school reporting, the production of blanks required triangulating the information needs of school administrators in a wide variety of jurisdiction and geographical settings—a task usually done by collecting sample records forms from large numbers of districts. One such study counted 1,515 different *unique* data items collected by the districts in the sample—reflecting a combination of Progressive Era interest in scientific management along with the burgeoning fields of mental and physical testing and their relationship to school achievement.[17]

Two professors from Teachers College, George Strayer and Nickolaus Engelhardt, led the way in producing a collection of uniform blanks to fulfill the needs of schools across the country. These forms became sufficiently popular that they were reproduced by private publishing houses around the country for purchase and use by local districts.[18] For Stayer and Engelhardt, as with others in the field of child accounting, they viewed their work expressly in terms of system building, explaining "A system of records and reports which will cement an entire state and even the nation in its educational undertakings…has been recognized as one of the greatest needs."[19] Though in rule of law and in practice there remained considerable variation in the extent and scope of student record keeping, the commitment to uniformity and comparability in records—as with so many other features of schooling (buildings, age-grading, etc.)—increasingly became the mark of the professional administrator and a proper system of public schools.[20]

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[17] Heck, 114. Among the largest categories of data collection: Of the 1,515 items 293 of them concerned medical examination; 152 school data; 137 family and home history. To give a sense of the idiosyncrasy of data collection: about half of the items recorded were unique to an individual district.

[18] Strayer and Englehardt *A Score Card and Standards for the Records and Reports of City School Systems,* 1923.

[19] Ibid.

[20] Tracy L Steffes, *School, Society, and State: A New Education to Govern Modern America, 1890-1940* (Chicago: University of Chicago Press 2012); David Tyack and Elizabeth Hansot, *Managers of Virtue: Public School Leadership in America, 1820-1980* (Westview Press, 1986).

Constructing the American System, One Unit at a Time

So far we have considered what, at the time, constituted system-level student record data. These system-level data were the primary concern of school officials because school attendance, rather than school achievement, was the most notable measure of school system efficiency and success.[21] That said, there was a parallel development in the way that high schools and colleges recorded student success that intersects the system-level story in important ways.

For much of the early 19th century, there was very little reason to record student-level data at either the collegiate- or common-school-level. In the era of the one room schoolhouse there was no age-grading and no academic grades at all. A student's achievement in class was denoted by their physical location in the room—students who did well moved forward, literally, and those who did not remained behind. Students could expect their position in class to change on a daily basis. The public was kept abreast of student achievement through year end public performances involving quizzes and recitation by students. American colleges followed a similar approach. Though colleges like Yale and Harvard recorded (often on a daily basis) the academic and personal behaviors of their students, these tabulations were *kept secret* from students until graduation day when they were used to assign graduation day honors and prizes.[22]

The reasons for the shift away from these early marking systems differ slightly at elementary and common school levels. Reformers like Horace Mann worried that the constant competition for seat placement sent the wrong message to students: emphasizing short-term gain over long-term goals. He advocated for the introduction of a report card—that he likened to a merchant's ledger—that would allow students and families to view educational achievement as an investment whose value was recorded and accrued over time.[23] These report cards served almost strictly as a communication device between teacher and parent in no small part because access to both high school and college were controlled by school-specific admissions tests making a student's specific course taking—and a transcript of that course taking—irrelevant. The same was

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[21] This is not to say there weren't concerns about student progress through school progress through school and the relationship between school features (like Kindergarten or middle school) and school achievement. But there was a clear focus on attendance rather than absolute achievement.

[22] The other use for these systems was to provide a basis for expelling students. Indeed, the impetus for these marking schemes were the many collegiate rebellions of the 1820s. See: Joseph F. Kett, *Merit: The History of a Founding Ideal from the Revolution to the Twenty-First Century* (Ithaca: Cornell University Press, 2013), 80-91.

[23] For a history of grading practices see: Jack Schneider and Ethan Hutt, "Making the Grade: A History of the A–F Marking Scheme," *Journal of Curriculum Studies* 46, no. 2 (2014): 201–24.

true at the collegiate level where there was a singular curricular track and all students took the same courses.

It was only in 1872 when Harvard President Charles Eliot introduced the elective system—an innovation that spread like wildfire—that colleges found a need to define their degrees in terms of courses taken, to establish the equivalency of course taking patterns, and to record a student's course taking record. By 1877, for example, the University of Michigan catalog explained that "24 or 26 full courses are required for the bachelor's degree (full course equals 5 exercises per week per semester, whether in lab, recitation or lecture)."[24] Eliot exerted a similar diversifying influence on the high school curriculum as a member of the Committee of Ten that advocated a broadening of what was considered an acceptable academic preparation for college going—specifically the study of modern languages and English. This led, again, to a move to establish the equivalency between course taking by measuring time units—a view that was consistent with the contemporaneous view of education as mental training—and, in turn, the keeping of records of students' course taking.[25] The idea of the course credit unit was soon incorporated into the North Central Association's high school accreditation definition and would ultimately be seized on by the Carnegie Foundation for the Advancement of Teaching in establishing their Carnegie Unit as a universal measure of educational progress and accomplishment.[26]

This was a pivotal moment both in the development of the student record and in the solidification of the American education system for three main reasons. First, it established—in practice if not reality—that an education was comprised of discrete educational denominations that could be collected, transferred, and, ultimately, redeemed. As one commentator derisively described it, one could now talk of "purchasing a diploma on the installment plan."[27] Second, the upshot of this view of education was the new obligation it placed on high schools and, especially, colleges to be the recorders and preservers of these records of student achievement. Because, as the same commentator observed, "Once a credit was earned, it was as safe as anything in the

[24] J.M. Heffernan, "The Credibility of the Credit Hour: The History, Use, and Shortcomings of the Credit System," *The Journal of Higher Education, 1973,* 63.

[25] Marc A. VanOverbeke, *The Standardization of American Schooling: Linking Secondary and Higher Education, 1870-1910* (Palgrave Macmillan, 2008).

[26] VanOverbeke, *Standardization of American Schooling* 132-133; J M Heffernan, "The Credibility of the Credit Hour: The History, Use, and Shortcomings of the Credit System," *The Journal of Higher Education*, 1973, 61–72; Dietrich Gerhard, "The Emergence of the Credit System in American Education Considered as a Problem of Social and Intellectual History," *Bulletin of the American Association of University Professors* 41, no. 4 (1955): 647–68..

[27] Norman Foerester, *The American State University, Its Relation to Democracy* (Chapel Hill: The University of North Carolina Press, 1937), 666.

world. It would be deposited and indelibly recorded in the registrar's savings bank."[28] Students and colleges themselves would increasingly rely on records offices to document and supply information both to mark progress within the institution and to external audiences.

At the turn of the 20th century, the Carnegie Foundation flexed its considerable financial might to facilitate greater standardization among schools.

Third, the Carnegie Unit not only created new record-keeping obligations for schools but also established new relationships between them—that is, who could give and who was obligated to receive this academic currency. For much of the 19th century, the line between high schools and colleges was ill-defined. Most colleges had "preparatory" departments that functioned as high schools and often enrolled far more students than the collegiate program and many academies took to calling themselves colleges because of the extra prestige it might provide.[29] Now, at the turn of the 20th century, the Carnegie Foundation flexed its considerable financial might to facilitate greater standardization among schools. One way it did this was by offering colleges access to its newly created pension plan for teachers and professors (known today as TIAA-CREF) in exchange for standardizing their operations along the lines recommended by the Foundation: an institution would not be considered a college if it accepted fewer than fourteen units of academic preparation from its enrolling students—a sign that some of the work of the college might be dedicated to high school level work.[30]

This line served both high schools and colleges well: solidifying their control over discreet populations of students; bringing the institutions into clear relationship to each other; and maintaining each institution's discretion over their curriculum by establishing *time*—academic training—as the universal measure of educational attainment. That is, the Carnegie Unit enshrined the idea that what made a student's academic preparation equivalent to another's was the fact that they had spent a similar amount of time engaged in academic "training" not that they had taken the same course of study. The willingness

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[28] Ibid., 666.

[29] VanOverbeke, *Standardization of American Schooling.*

[30] The best history of the Carnegie Foundation and its early involvement with education issues remains Ellen Condliffe Lagemann, *Private Power for the Public Good: A History of the Carnegie Foundation for the Advancement of Teaching*, (Middletown, Conn.: Wesleyan University Press, 1983).

to accept each other's academic credit—either as a means of access or as directly transferable—came increasingly to define the relationships between schools and across levels of the American education system. Not coincidentally, the American Association of Collegiate Registrars and Admissions Officers (AACRAO) formed in 1910—a visible recognition of the increasing inter-reliance and the need for greater cooperation among schools.

Though the unit of educational attainment and basic structure of the American education system had been articulated by the first decades of the 20th century. There remained a great number of details still to work out as schools shifted from dealing with students either strictly as aggregated statics (as in the school censuses) or as strictly wards of individual institutions. Some states, like Michigan in 1922, took the step of establishing a uniform system of child accounting complete with a uniform census form, marking system, and cumulative individual school record that contained academic, psychological, and physical records of the student from kindergarten to high school that could be transferred with the student throughout the state.[31] But in taking such decisive action the state was very much an outlier.

The lack of standard definitions in collecting, recording and reporting information; non-standard evaluation practices; and general insularity of schools remained significant challenges for administrators especially during the Progressive Era when enrollments were expanding, populations were increasingly mobile, and public demands for evidence of the effectiveness and efficiency in public education expenditures grew louder.

If the early days of the student record were characterized by the need to develop the tools necessary to maintain student records—units, definitions, hierarchies—that brought schools at various levels into relationships with each other, the period between World War I and the 1970s was defined by the challenge of maintaining those relationships amid a rapidly shifting higher education landscape populated by a quickly diversifying set of institutions and students. These changes forced schools to grapple with their interconnectedness on a new scale. It also required them to be more proactive in their efforts at coordinating institutional responses as new kinds of learning and new kinds of institutions sought legitimacy—that is, sought sovereignty—the right of inscription—over the student record. These changes had the effect of de-centering individual schools and their record systems and foregrounding individual students as the transfer student and the "lifetime learner"—a construct that debuted in this period[32]—became a staple of

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[31] Moehlman, *Child Accounting*, 26.

[32] In 1977 Ronald Gross published his *A Handbook for the Lifetime Learner*, solidifying a phrase that had been percolating in publications throughout the decade.

higher education. With fewer degrees and certificates marking the actual terminus of individuals' educational journeys, colleges and schools found themselves not only standing *in loco parentis* but also as a fiduciary responsible for maintaining and preserving a student's record of educational investments.

The Student Record in the Era of Massification (1910-1970)

The Student as Serviceman - The Academic Record of Military Service

The sound of change that would reach full roar in the aftermath of World War II was still only a conversational murmur on April 24, 1919 when the American Association of Collegiate Registrars gathered in the William Rainey Harper Library at the University of Chicago to take stock of the lessons the Great War had taught their institution and take the measure of the challenges that still lay ahead. The War had brought significant disruption to campus life. In an effort to maintain student enrollments and show commitment to the war effort, many colleges had allowed the military literally to set up camp on their quads and in their administrative and academic buildings so that students could receive military training as part of the Student Army Training Corp (SATC) while still in college.[33] In addition to drawing on the resources of American colleges to educate and train soldiers, the military had also drew on the facilities of European colleges and universities (while drawing professors from the US or from the ranks of the military) to provide continuing educational opportunities for officers and enlisted men in order to maintain morale and "improve their usefulness as workers and citizens."[34]

Given the circumstances posed by the war, affordances of all kinds—duration, rigor — had been made that now had to be squared with the normal work of colleges. As one registrar reflected, "college presidents are holding up their hands and appealing to the association of registrars and saying 'Won't you issue a statement as to how the that transfer is to be made, and not only those records kept properly, but how are the records to be kept of these students who have [been] allowed credit because of war work."[35] As this statement alludes to, the challenge for registrars was whether and how to grant credit for these non-traditional educational experiences—experiences that included both basic military training and specialized training particular military disciplines.

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[33] Students, eager to get to the front, derisively claimed that the program stood for Stuck at the College.

[34] American Association of Collegiate Registrars and Admissions Officers, *9th Annual Proceedings of the American Association of Collegiate Registrars and Admissions Officers*, (Washington, D.C.: AACRAO, 1918), 27.

[35] Ibid., 59.

The major points of contention were whether colleges "owed" soldiers recognition (in the form of academic credit) for their service; whether the specialized military training could be evaluated and thereby translated into academic units; and whether providing academic credit amounted to an unfair double counting in the case of officers who had redeemed their training for an officer's commission.[36] Ultimately the group decided against making a formal recommendation on how to treat these educational experiences leaving the judgment, as Arthur Hall of the University of Michigan put it, to the "credit-fixing officer or committee which, with the delightful lack of uniformity in American institutions, is different in all, or practically all institutions."[37] While different colleges offered different amounts of credit for students' military service, nearly all colleges settled on a policy of "blanket credit"—awarding students a specific amount of credit based on their service and training rather than attempt to evaluate the military learning in a formal way.

Though the registrars refrained from making a formal recommendation, there can be no doubt that the group gathered in Chicago was beginning to think of their work as more and more central to the core functions of their institutions. Charles Judd of the upstart University of Chicago captured the spirit of the gathering, explaining in his address that:

> the business of the recording office is to devise new methods of systematizing the work of the institution...initiative and scientific insight can be cultivated, I believe, in the presence of college records better than in almost any other connection where college students and instructors can be viewed...the registrar's office ought to be not merely a place where records are stored up; it ought also to be a place where scientific studies of these records are initiated and carried out.[38]

In this way, Judd believed, the registrar's office could be made "an important center of administration" on every college campus.

Judd's prediction would prove especially prescient a quarter century later when, towards the end of World War II, registrars had to revisit and rethink the approach taken by their colleagues at the close of the Great War. As with WWI, the military chose to make educational provisions a key part of its strategy to boost morale and keep servicemen

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[36] For a broader discussion of the challenge of accrediting military experience posed for high schools and universities see Ethan L. Hutt, "The GED and the Rise of Contextless Accountability" *Teachers College Record* 116, no. 9 (2014) and Ethan Hutt and Mitchell Stevens "From Soldiers to Students: The Tests of General Educational Development (GED) as Diplomatic Measurement, 1942-1948" (TLPL: Working Paper); Ethan L. Hutt, ". College Park, MD: University of Maryland.

[37] AACRAO, *9th Annual Proceedings,* 18.

[38] Ibid., 35-36.

focused on their post-war lives.[39] Reflecting the prevailing psychological thinking that viewed education as a form of psychological adjustment therapy, this strategy was mimicked in Congress's "re-adjustment" plans for servicemen after the war—most notably in the education provisions of the GI Bill. While higher education institutions had been able to make do with an ad hoc plan for dealing with returning veterans following World War I, the magnitude of the educational undertaking during the war (1.5 million servicemen enrolled in correspondence courses); the number of demobilizing veterans (16 million); and the amount of federal money at stake (a maximum $500 per year per veteran—ultimately totaling $14.5 billion) suggested a more proactive, systematic approach was required.[40]

In particular, college administrators worried that if colleges and universities did not act collectively as a sector it would jeopardize academic standards and institutional legitimacy. This concern stemmed from their experience after WWI during which, in the absence of a uniform policy, servicemen often shopped for credit: seeking out the institution that would give them the most academic credit for their service experience and, in some cases, setting off bidding wars among schools eager to attract new students by lavishing them with academic credits for their military experience.

As it had been following World War I, the primary issue was what elements of the military experience could be transformed into academic credit worthy of recording on a student's transcript. To answer this question—and in a uniform way—institutions relied on the efforts of the American Council on Education (ACE)[41]—a membership organization representing the interests of higher education institutions, working at the intersection of federal educational, military, and business policy. Drawing on the expertise of registrars, content area specialists, and psychometricians, ACE came up with a two-part solution to the problem of the "Accreditation of Service Experience."

The first part involved tapping George Tuttle—registrar at the University of Illinois and former AACRAO president—to create a definitive volume containing a list of all the correspondence, military, and technical training courses available to servicemen during

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[39] Christopher Loss, "'The Most Wonderful Thing Has Happened to Me in the Army': Psychology, Citizenship, and American Higher Education in World War II," *The Journal of American History* 92, no. 3 (2005): 864.

[40] Suzanne Mettler, *Soldiers to Citizens: The GI Bill and the Making of the Greatest Generation* (Oxford University Press, USA, 2005).

[41] The American Council on Education continues to play a significant role at the intersection of higher education, military, and federal government affairs. The organization advocates on behalf of its 1,700 member institutions (comprised of two- and four-year colleges, private and public universities, and nonprofit and for-profit accredited, degree granting institutions) on matters of higher education policy; runs a prominent administrator training program, and continues to oversee the GED Testing Service.

the war *and* a credit recommendation for the course. The resulting book—referred to as *The Tuttle Guide*—spanned more than 1,000 pages and, after its introduction, was updated and reissued roughly every two years in order to keep it current. This volume proved an invaluable tool for maintaining coherent academic standards while honoring military service by extending academic legitimacy to military training (97% of universities reported following the *Guide's* recommendations[42]). The second part of the planned involved using standardized achievement tests to establish general academic mastery however achieved. The most significant of these tests, the Test of General Educational Development (GED), was designed to establish the equivalence of a servicemen's general knowledge to that of the high school graduate—a critical function given the GI Bill's educational provisions and the fact that fewer than half of GIs were high school graduates (a quarter never attending high school at all). Other examinations developed sought to assist colleges with student placement and establish mastery of subjects both within and outside the context of individual correspondence courses.

The Rise of the Non-Traditional Student and the "Postsecondary" Education Sector

It is hard to overstate the significance of these developments for the future of higher education and, I would hasten to add, the student record. The story of the "massification" of higher education—especially for white Americans—as a result of the GI Bill is well known and well told by scholars.[43] As Christopher Loss has recently argued the GI Bill "whetted Americans' appetite for education and cemented a reciprocal relationship between higher education and the state" and, crucially, established precedent for claims that higher education access was a new citizenship right—a right that would be elaborated incrementally via the National Defense Education Act (1958), Higher Education Act (1965), and the Education Amendments (1972).[44]

The other, less recognized, aspect of this history is the tremendous institutional coordination that allowed this massive expansion to occur. This required institutions to develop better and new ways of recognizing non-traditional learning experiences (and by non-traditional students), non-traditional types of educational institutions,[45] as well as

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[42] F.D. Miscampbell, "The Advisory Service of the Commission on Accreditation," *Journal of the American Association of Collegiate Registrars* 22, 471—46.

[43] See for example, Loss, *Between Citizens and State*. For a good overview of the sociology literature see Mitchell L Stevens and Ben Gebre-Medhin, "Association, Service, Market: Higher Education in American Political Development," *Annual Review of Sociology* 42 (Forthcoming).

[44] Loss, *Between Citizens and State*, 117.

[45] Of the 7.8 million veterans using the educational provisions of the GI Bill 2.2 million did so at the collegiate level, the rest seeking out training and certification programs.

new ways to study how these innovations were serving students. One can track these developments in debates about how best to capture and reflect these developments on the student record. In particular, these debates played out along three lines: What information should schools collect and maintain on their students? Which institutions should be allowed to grant academic credit at the postsecondary level? How should this credit be recorded and what kinds of experiences should be counted for credit?

> "When one considers the tremendous amount of time, effort and money invested in a student's education, and when it is realized that the permanent record is the single item which documents the degree, one becomes increasingly aware of the responsibility of those who are entrusted with its safekeeping."

The significance (and challenge) of these developments was clear to administrators at the time. The pages of the AACRAO journal *College and University* are filled with articles concerning the new strain that a larger and more institutionally transient student placed on existing record systems. As one commentator reflected, "When one considers the tremendous amount of time, effort and money invested in a student's education, and when it is realized that the permanent record is the single item which documents the degree, one becomes increasingly aware of the responsibility of those who are entrusted with its safekeeping."[46] In light of these newly realized responsibilities, the AACRAO's Committee on Transcript Adequacy began publishing regular manuals spelling out the (twenty-five) essential elements of any academic transcript and detailing the obligations for their maintenance and dissemination, which it called "a primary obligation and fulfillment of trust on the part of all institutions of higher education."[47] The Committee on Transcript Adequacy's statement reflected its understanding that the fates of all institutions of higher education were intertwined and that the student record was at the

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[46] V.J. Whittaker, "Rights of the Student as Related to the Protection of His College Transcript," *College & University* 42 (October 15, 1966), 78.

[47] American Association of Collegiate Registrars and Admissions Officers and Committee on Transcript Adequacy, *An Adequate Permanent Record and Transcript Guide.* (New York: AARCCO, 1959), 1. The AACRAO issued manuals in 1942, 1945, 1947, 1949, 1950. Following the recommendations in these volumes, one is struck by how the desire to create a uniform record system gives way to the, decidedly less ambitious, desire to secure uniform *elements* within desperate records systems.

center of this entanglement. If schools could not rely on each other to produce records in standardized, usable formats they risked calling into question the coherence of the sector and the status of giving and receiving institutions as peers. The flipside of this, of course, was that institutions who did not conform risked being excluded from a coalescing sector and new institutions recognition likely came at the price of adopting existing norms around the maintenance and distribution of the student record. Thus AACRAO was able to position itself as the virtuous defender both of the student record and of the institutions that produced them.

A number of states did not rely on the voluntary adoption of standardized practices like those outlined by AACRAO. Instead, they made these institutional obligations expressly legal. Many states passed laws indicating that, even in the event of its dissolution, an institution's responsibility to preserve student records existed in perpetuity—a reflection of both the extended life expectancy of a student record and the precarious health of many institutions that came into being in the wake of the GI Bill.[48]

Whether adopted voluntarily or in response to legislative action, the push for greater standardization, maintenance, and preservation of student records reflects a growing recognition that student records had ceased to be merely internal administrative records with strictly educational audiences. The shifting demographics and goals of the student in higher education meant that it could no longer be assumed that the information recorded on a student's transcript would ultimately culminate in a degree. Care now had to be taken to ensure that a transcript could intelligibly reflect not just degree completion but partial program completion and individual course taking patterns. Likewise, the massification of higher education and the sector's status as an increasingly gatekeeper for the labor market meant that the academic transcript now had an audience that included not only admissions committees but also licensing bodies, and employers. This recognition that the student record might have multiple audiences with cross-cutting interests and informational needs spurred broader reflection discrete elements that comprised a student's record and their potential uses.

Following the practices of their colleagues in secondary education administration, colleges had, since the 1920s, begun maintaining records relating to the physical and mental attributes of their students. Interest in cataloging these traits stemmed in large part from the rise of the mental testing, mental hygiene, and personnel management movements as well as the increase expectations on colleges to assist their students in

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[48] The AACRAO 1960 manual covers details these laws. In most cases the schools were required to hand over their records for preservation by state educational authorities or state archives.

finding employment before and after graduation.[49] The internal use of these data to improve the design of programs—in the way that Judd had imagined—the retention of students, and the placement of graduates accelerated considerably after the war. What began as an institutional concern over the psychological readjustment and academic success of servicemen gave way (after most studies concluded they were doing as well if not better than the average student) to broader concerns about the well-being all students especially after the passage of HEA when colleges expanded their recruitment of non-traditional students.[50]

The growing accumulation of academic and non-academic information in student files generated a growing conversation throughout the 1960s—a small piece of the broader rights revolution—about the need to handle the student record with discretion and, perhaps, as strictly confidential.[51] In particular administrators were warned not to intermingle the disciplinary and academic records of students in a way that would prevent a "clean" transcript of academic achievement from being passed along to a future school or employer.[52] The need for a clear answer to the question of what constituted the "relevant" portion of the student record was especially pronounced when it came to the long-term storage of records. Given the cost of storage and retrieval of paper records, this was no small matter. Many schools alleviated the problem by taking advantage of the increasingly widely available, cost-effective, and space-saving microfilm technology and, later, magnetic tape and computer technologies. Still, schools found themselves making difficult (and divergent) judgment calls about which records, beyond the basic course transcript, might be of interest or use to a future vocational counselor, school, or

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[49] By 1925 nearly half of all large colleges had placement bureaus designed to help students find work during college. This trend accelerated during the Great Depression when colleges realized that student's ability to afford tuition was directly linked to employment prospects. The federal government pitched in during the Great Depression with the work-study program administered under the Federal Emergency Relief Administration and later the National Youth Administration. The program is credited with helping 620,000 students help finance their higher education. (Loss 73); Kett; *Measure of Merit*; John Seiler Brubacher and Willis Rudy, *Higher Education in Transition: A History of American Colleges and Universities, 1636-1976*, (New York: Harper & Row, 1976).

[50] Loss, *Between Citizens and* State, 177.

[51] See, for instance, J. Whittaker, "Rights of the Student as Related to the Protection of His College Transcript.," College & University 42 (October 15, 1966): 78–87; Russell Sage Foundation, Proposed Principles for Management of School Records (1970) noting both that "Pupils and parents typically have little or, at best incomplete knowledge of what information about them is contained in school records and what use is made of this information by the school" and that "Access to pupil records by nonschool personnel and representatives of outside agencies is, for the most part, handled on an ad hoc basis. Formal Policies governing access by law enforcement officials, the courts, and potential employers, colleges, researchers, and others do not exist in most school systems."

[52] Whittaker, 83. Most registrars agreed that disciplinary records pertaining to academic misconduct should be reflected in the academic transcript. Other commentators wondered whether schools should share the reason a student was discharged from school. See: Abraham S. Goodhartz, "Who Is Honorably Dismissed?," *College & University* 33, no. 3 (April 17, 1958): 321–23.

employer. Most schools resolved to establish specific schedules for destroying records deemed no longer valuable at precise time intervals.[53]

Whatever records an institution decided to maintain, the imperative to share at least portions of these records became increasingly pronounced as the average college student became increasingly likely to attend more than one institution of higher education during the course of his or her lifetime. The increasing prevalence of transfer students forced schools to devise new, more precise ways to track students across institutions as students came to expect that their prior educational achievements would be recognized by subsequent schools. In 1966, Syracuse University pioneered an effort to use student social security numbers as an internal means of student identification explaining, "With the increase of transfer students, expanding enrollments in graduate and professional schools, the social security number provides a universal identification among all colleges and universities."[54] The effort was bolstered by the Educational Testing Service's (ETS) parallel initiative requiring students to provide a social security number for test registration and soon many colleges followed suit.[55] This administrative need to maintain unambiguous records on the identity of enrolled students took on a graver, political valence during the escalation of the Vietnam War as draft deferments became linked to college enrollments.[56]

The Student Record of the "Lifelong Learner"

Concurrent to these efforts to manage individual student records was the effort among registrars and administrators to establish clearer rules and guidelines for the recognition of institutions and for the transfer of credit across institutions. Not surprising in a period that saw the massive expansion of community colleges and associate degree programs (an expansion linguistically signified by the appearance of the new catchall term "postsecondary institutions" in the education lexicon) there was considerable confusion about how and whether to grant credit from newly established institutions. As one commentator, referencing the Babel of academic courses and units complained, "Education has no Linnaean system nor even a lingua franca for communicating the nature and content of academic courses"—a reality that led the commentator to caution

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[53] A federal law allowing microfilm reproductions of documents to stand in for the originals was a crucially important development.

[54] E.D. Smith "Who's on First?" *College & University* 42 (October 15, 1966), 76.

[55] Edwin D. Smith, "Advantages of the Social Security Number as an Identification Number," *College & University* 44 (July 15, 1969): 607–9.

[56] Bobby L. Cochran, "Selective Service Reports," *College & University* 44 (July 15, 1969): 661–65.

students that "transferring from one educational institution to another will often test the prospective student's persistence and, occasionally, sporting blood."[57]

These challenges sparked a tremendous interest on the question of the transfer student and the matter of articulation between the community college and traditional four-year colleges. Mirroring the response following WWII, associations banded together to articulate guidelines for the incorporation of this new sector of American higher education. In 1958 the Joint Committee on Junior and Senior Colleges was created as a partnership between AACRAO and the Association of American Colleges and the American Association of Junior Colleges. This committee began producing reports like its influential *Guidelines for Improving Articulation Between Junior and Senior Colleges*, which stressed the "urgent" need for "mutual respect and cooperation...carried on in an atmosphere of interdependence among institutions having common concerns in higher education" lest more states "force" articulation by legislative fiat.[58] Among the committee's recommendations was the encouragement that receiving institutions accept student credit from new, not-yet-accredited junior colleges.[59]

It is not hard to understand the sense of urgency that administrators felt in encouraging schools to build bridges to these emerging entrants into the postsecondary space: a study of Illinois college students found a 70% increase in the number of transfer students in the five year period between 1967 and 1973;[60] and a 1974 Florida study found that transfer students accounted for over 60% of the upper level student enrollments in eight of the state's nine public universities, with 65% of those transfer students coming from the state's community colleges.[61]

Impatient over the obstacles to clear articulation and the smooth transfer of credits led some states to pass laws specifying the legal equivalency of higher education credits earned at community colleges within the state while consumer rights advocates threatened that the matter of credit transfer was becoming a consumer protection issue.[62] Given these pressures it is not surprising that higher education professional

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[57] Robert Kirkwood, "STUDENT MOBILITY AND TRANSFER" in Jerry W. Miller and Olive Mills (eds.), *Credentialing Educational Accomplishment. Report and Recommendations of the Task Force on Educational Credit and Credentials* (Washington, D.C.: American Council on Education, 1978), 171.

[58] Joint Committee on Junior and Senior Colleges *Guidelines for Improving Articulation between Junior and Senior Colleges* (Washington, D.C.: American Council on Education, 1966), 6.

[59] Ibid., 8-9.

[60] Illinois Council on Articulation, "Transfer Students in Illinois" *North Central Quarterly* 46 (1971); Illinois Community College Board "A Statewide follow-up study of fall 1973 transfer students from Illinois public community colleges" p. 3

[61] Kirkwood, "Student Mobility and Transfer."

[62] Andra Willet "Consumer Protection in Higher Education: Why? For Whom? How" *Liberal Education 61 (1975)*: 163.

organizations like AACRAO began publishing yearly comprehensive lists indicating the general acceptability of work completed at every college (junior, technical, normal, etc.) and university in every state.[63]

Despite the hand-wringing and hiccups, these efforts were largely successful—at least at the regional level—in incorporating the community college and the associates degree into the basic structure of American higher education. As with the high school a half-century earlier, the incorporation of new institutions within the educational hierarchy was aided by the acceptance of a common currency and a clear hierarchy that provided a mutual incentive for both the delineation of clear borders but also close cooperation. But while community colleges were successfully integrated into the higher education sector, attempts at more radical re-imaginings of higher education and the student transcript were decidedly less successful.

College Credit for Non-College Learning

While community colleges and certificate programs sought to blaze new trails off existing educational pathways, others sought a more radical approach. As has often been the case in the history of American higher education, the spur to innovation came from the poor economic climate facing prospective students and the colleges that hoped to attract them. In particular, the economic uncertainty of the 1970s which saw high inflation, high unemployment, and a stagnating economy caused many commentators to doubt the economic value of higher education as in the case of Ivar Berg's widely read book *Education for Jobs: The Great Training Robbery*.[64] The pressure was on to find ways, in the words of the Carnegie Commission on Higher Education, to create programs involving "Less Time, More Options."[65]

As in the years following WWII, one way to accomplish this was the fuller embrace of "competency" and achievement-based standardized testing such as ETS's College Level Examination Program (CLEP). But for many, these programs only challenged the standard time to degree rather than the experiences that amounted to a postsecondary education. Thus some schools tried to innovate on the traditional educational transcript.

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[63] See for example, American Association of Collegiate Registrars and Admissions Officers., "Report of Credit given by Educational Institutions.," (Washington, DC: American Council on Education, 1960).

[64] Ivar Berg, *Education for Jobs: The Great Training Robbery* (New York: Praeger, 1970).

[65] Carnegie Commission on Higher Education, *Less Time, More Options: Education Beyond the High School* (New York,: McGraw-Hill, 1971). There was also a recognition among universities that, with the still changing demographics of higher education, the need to seek out new students and utilize the institutional capacity that had been built up over the prior two decades. See, for example, 1. Elizabeth A. Duffy and Idana Goldberg, *Crafting a Class: College Admissions and Financial Aid, 1955-1994* (Princeton: Princeton University Press, 1998).

Among the more notable of these innovations—registrars at the time preferred the term 'headaches'—was the debut of the "narrative transcript."

To its ardent proponents, the narrative transcript was an innovation necessary to capture the complexities of the learning process, the multitude of formal and informal sites of learning, and the personalized life and career goals that characterized the, now expanded, postsecondary student.[66] The focus of the narrative transcript was on documenting the demonstration of competencies—as opposed to the mere "acquisition of credits"—that its proponents argued were a more realistic reflection of the world of work. These efforts were backed by initiatives like the Carnegie-Foundation-backed Cooperative Assessment of Experiential Learning (CAEL) and the push to develop more ways to "award college credit for non-college learning" and to establish "external degree" programs—that is, programs that broke the traditional link between on-campus time and college credit.[67]

> To its ardent proponents, the narrative transcript was an innovation necessary to capture the complexities of the learning process, the multitude of formal and informal sites of learning, and the personalized life and career goals that characterized the, now expanded, postsecondary student.

Despite considerable investments of time, energy, and creativity these programs struggled to gain broad traction in postsecondary education. This failure was chalked up to many different causes but observers tended to home in on three major shortcomings. First, though proponents argued that narratives offered more precise descriptions of achievement, colleges frequently struggled to translate these narratives into their own institutional definitions of competency or achievement—a problem that presented itself equally to institutions using traditional and non-traditional transcripts.[68] A second, and

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[66] Aubrey Forrest, Richard Ferguson, and Nancy Cole, "The Narrative Transcript: An Overview," *Educational Record* 56 (1975): 59–65.

[67] Peter Meyer, *Awarding College Credit for Non-College Learning; Houle, External Degree.*

[68] Donald Hoyt, "Competence as the Basis for Credit and Credentialing" in Jerry W. Miller and Olive Mills (eds.), *Credentialing Educational Accomplishment. Report and Recommendations of the Task Force on Educational Credit and Credentials* (Washington, D.C.: American Council on Education, 1978), 154.

related, problem was that these programs did not actively manage the interconnectedness of institutions. As one commentator observed, attempts to replace the Carnegie unit "have proved inadequate because they have failed to address the problem of interchangeability."[69] This failure led to a third problem: bolstering the legitimacy of alternative forms. Unsure how to incorporate alternative forms of information, institutions tended to fall back on inherited systems. According to one proponent of awarding college credit for life experience, "many programs attempt to disguise prior learning credits or convert them directly to course credits for use on the transcript." These Corbusian attempts to overlay rationality on a chaotic lifetime of learning, make it easier to record student progress but at the cost of de-legitimation: "Non-traditional study often becomes very traditional when confronted with the transcript. Experimental designs are forced into traditional frames...ultimately [such efforts] cause harm because they continue to silently admit that the process is shady."[70]

As counterintuitive as it may seem, the journey to establish competency-based credentialing and narrative transcripts led some to return to singing the praises of the *flexibility* of the traditional credit hour. The only way to make the alternative system work, they reasoned, was to over-determine the meaning of each competency or level of achievement thereby removing potentially desirable variation. John Harris and William Trout offered a version of this argument in their essay "Educational Credentials: Past, Present, and Future," explaining:

> The rich educational fabric, both the consequence and the reinforcer of a pluralistic culture, represents a great social strength. Conversely, an academic accounting system based on nationwide, common, explicit achievement units would probably diminish the diversity among institutions. The credit hour accommodates both educational diversity and a commonality for expressing educational attainment.[71]

Of course, the taken for granted premise of this statement was that the "diversity among institutions" did not prevent them from comprising—through a combination of mutual respect, trust, and legislative glue—a single higher education system that could share students and records and measures of achievement.

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[69] Richard Ferguson, "Assessing Learning for Credit and Credentials" Jerry W. Miller and Olive Mills (eds), *Credentialing Educational Accomplishment: Report and Recommendations of the Task Force on Educational Credit and Credentials* (Washington, D.C.: American Council on Education, 1978), 103.

[70] Peter Meyer, *Awarding College Credit for Non-College Learning* (San Francisco: Jossey-Bass Publishers, 1975), 59-60.

[71] John Harris and William Trout "Educational Credentials: Past, Present, and Future" in Jerry W. Miller and Olive Mills (eds.), *Credentialing Educational Accomplishment: Report and Recommendations of the Task Force on Educational Credit and Credentials* (Washington, D.C.: American Council on Education, 1978).

Though it would have been difficult to imagine a half-century before, by the end of the 1970s the American higher education system has managed to expand massively in terms of the quantity and type of its students, degree programs, and institutions. And despite this massive expansion the system managed, in more ways than not, to hold itself together through a combination of a shared system of academic credits and a commitment to incorporate new institutional forms into existing hierarchies—efforts that required the articulation of both distinct and shared interests.

The Student Record in a Time of Accountability (1970 - Present)

If the first period was about system building and the second period was about its expansion and the internal renegotiation—among students and schools, and schools and each other—that massification required, the current period is characterized by new external demands that have been placed on the system by several forms of accountability: privacy, equity, and efficiency. Though all of these pressures predate the current period in some form, major shifts in American political dynamics and in the availability of computing power and digital technologies have converged to amplify old concerns and produce new ones. The major upshot of these developments has been to make the student record not just an object of internal (re-)negotiation among postsecondary institutions but one subject to external demands as well. Considering these new developments in-light of the broader history detailed above provides an opportunity to identify the new opportunities as well as the chronic challenges ushered in by the digital era of the student record.

Privacy and the Student Record

As noted in the previous section, prior to the 1960s there was very little formal consideration or policy around the handling of student records. Sensitivities around the collection and content of government held records began to shift around mid-century— beginning with the backlash against McCarthyism and accelerating with concern over government data collection on the activities of Civil Rights activists and Vietnam Era protesters. This general suspicion of government data collection—always visible in American history but now adorned with the specter of totalitarian governments—ran headlong into a federal government that was increasingly interested in collecting and analyzing data on the effectiveness of its social policy programs and that, thanks to advances in computer mainframe technology, was increasingly within its grasp.

The 1960s were speckled with reports and recommendations about how the government could best facilitate the collection and analysis of social data while still preserving the

privacy rights of citizens.[72] In education, these developments were discussed at length in professional journals where practitioners noted the increasingly large amount of information collected on students, the increasing ease of retrieval of that information (thanks to the availability of IBM systems), the growing number of professionals and companies interested in this information, and, crucially, the lack of clear guidelines or professional codes of ethics.[73] This left administrators to confront a number of "gray" areas when it came to critical questions like, as one commentator succinctly put it, "What information should be released, to whom, under what circumstances?"[74]

These swirling questions prompted the Russell Sage Foundation to convene a group of professors, administrators, and guidance counselors to consider the threat posed now that the "strongest traditional allies of privacy...the inefficiency of man, the fallibility of his memory, and the healing compassion... [of] the passing of time and the warmth of human recollection" were now being "put to rout" by modern computing technology.[75] The conference began from the recognition that despite the "extensive pupil records" maintained by "virtually all school systems" there were few systems in place to define the proper use and disclosure of this information. The report of the convening recommended that schools embrace a norm of explicit, individual consent with respect to the collection of student information ad that this information be classified under three headings each posing different risks to the student and obligations on the collecting institution.[76]

The Russell Sage report was followed by a report from the Department of Health, Education, and Welfare—*Records, Computers, and the Rights of Citizens*.[77] The report, which followed a series of hearings in the late 1960s stemming from a proposal to create a "National Data Center," stressed the potential of computers to pose a threat to

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[72] For example, in 1965 Congress held hearings on a proposal to create a National Statistical Data Center. These proposals spawned a series of reports and journal articles considering the implications the aggregation of such large amount of information on individual citizens. See HEW Records, Computers, Rights of Citizens; Sawyer J and Schechter H, "Computers, Privacy, and the National Data Center: The Responsibility of Social Scientists," *The American Psychologist* 23, no. 11 (1968): 810–18.

[73] See for instance Anderson "Confidentiality Expectations of College Students"; F.L. Vance "Confidentiality Interpreted by Professional Judgement and Staff Review" *Personnel and Guidance Journal* 42 (1963): 254-257.

[74] Anderson, 264.

[75] Russell Sage Foundation, *Guidelines for the Collection, Maintenance & Dissemination of Pupil Records: Report of a Conference on the Ethical and Legal Aspects of School Record Keeping* New York: Russell Sage Foundation, 1970), 5-6.

[76] The three categories ranged from: (1) official administrative records that "constitute the minimum personal data necessary for operation of the educational system"; (2) "verified information of clear importance but not absolutely necessary to the school, over time, in helping the child or protecting others"; (3) "potentially useful information but not yet verified or clearly needed beyond the immediate present" (e.g. personality test results; teacher or counselor comments, work samples, etc.), Ibid., p 21-23.

[77] Department of Health, Education, and Welfare, *Records, Computers, and the Rights of Citizens; Report.* (Washington, D.C.: U.S. Government Printing Office, 1973).

traditional understandings of privacy. The HEW report, which both cited and echoed the Russell Sage report, stressed the importance of disclosure (of the existence of records), confidentiality, and the right of an individual to inspect the records maintained about him or herself. Most importantly, the report called for Congress to pass legislation that gave legal authority to these protections. The next year Congress responded by enshrining these values in the 1974 Federal Educational Rights and Privacy Act (FERPA).[78] The passage of FERPA has been rightly identified as a watershed moment in the history of student rights and privacy. For the first time in the century-long history of student record keeping, the "student record" had been given a specific legal definition and its holder's specific obligations.

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Even while FERPA articulated a student's rights to be notified of record keeping and to inspect the records maintained by schools, the illumination of these rights cast many legal shadows. In many respects these gray areas were the ones that had long challenged the education sector: Who counts as a student? What constitutes an educational record? Which institutions and entities should be allowed to possess them? And what uses constitute an "educational purpose"?[79] Though for most of the prior century these definitions had been subject to professional norms and mutual ascent, now they were established by federal statute. Still, the fundamental interconnectedness and need for mutual cooperation across educational institutions at all levels remains and has been largely constant—even if constrained—by federal involvement. Also, as in the past, new kinds of educational institutions operate with an uncertain status: just as it was unclear

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[78] Many scholarly discussions of FERPA note that it was an amendment introduced by Senator Buckley without any discussion from the floor and incorrectly conclude that its ideas came out of nowhere. Its principles of confidentiality and inspection almost perfectly mirror those in the HEW report.

[79] Elise Young, "Educational Privacy in the Online Classroom: FERPA, MOOCs, and the Big Data Conundrum," *Harvard Journal of Law and Technology* 28 (2015): 549–93.

whether correspondence and community college courses should be afforded recognition by academic institutions, it is now unclear whether those who take online courses deserve the status of "student" and their collected information the status of "educational record." [80] Consistent with this long history, efforts to clarify and reach consensus on these issues has come primarily from concerned parties within postsecondary education rather than the federal government. In this case, notably, the Asilomar Convention for Learning Research in Higher Education, in June of 2014, laid out a series of principles to inform the collection, storage, distribution, and analysis of data collected from digital learning platform.[81]

Though there are similarities between the challenges posed by the implementation of FERPA and the prior history of the student record, there are also some significant differences. While educators since the 1870s had the ambition to use all the information available about family background, physical health, personal disposition, and mental ability to predict student success and improve educational programs, our current ability to collect, combine, and calculate with these data is without precedent. While schoolmen in the era of Horace Mann were able to produce 1,515 kinds of data about their students they were severely limited in their ability to preserve, analyze, or transmit this data. Today these physical and logistical limitations no longer apply.

> ## While schoolmen in the era of Horace Mann were able to produce 1,515 kinds of data about their students they were severely limited in their ability to preserve, analyze, or transmit this data. Today these physical and logistical limitations no longer apply.

Likewise, for most of the history of the student records, students were often as enthusiastic advocates of school record sharing as schools themselves—eager to see their educational achievements honored and accruing to higher prizes. The considerable work

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[80] Different providers have come up with different answers to this question and the Department of Education's own guidance is a none too illuminating, "it depends" See: Department of Education, "Protecting Student Privacy While Using Online Educational Services: Requirements and Best Practices," accessed May 20, 2016, https://tech.ed.gov/wp-content/uploads/2014/09/Student-Privacy-and-Online-Educational-Services-February-2014.pdf.

[81] See: "The Asilomar Convention for Learning Research in Higher Education," (June 13, 2014), accessible at: http://asilomar-highered.info/asilomar-convention-20140612.pdf. For more information on this convening, see: http://asilomar-highered.info/.

required, however, almost always assured that the student initiated the transfer of information between institutions—preserving the opportunity for a fresh start and preventing an unwanted accumulation of personal information. Now institutions have considerable, independent capacity to collect and combine (from a variety of sources) information—capacities that can be pitted against students' established rights (of privacy and college access) with uncertain outcomes and unclear benefits.

The Student Record in the Service of Equity and Efficiency

The increased attention to issues of student privacy paralleled an increased interest in government data gathering in all areas of social policy including education. Though the federal government—via the Bureau of Education—had been responsible for the *compilation* and dissemination of education statistics since the end of the Civil War, it was not until the passage of the Civil Rights Act of 1964 that the federal government became interested in the *production* of education statistics. It began with commissioning the Coleman Report but was more fully realized through the erection of an entire educational data infrastructure comprised of, among other things, the National Center of Education Statistics (NCES), the decennial longitudinal student surveys (e.g. Project Talent, NLS-72), and yearly institutional surveys (e.g. HEGIS, IPEDS, CIP).[82]

These efforts were part of a wide scale effort to introduce military and social-science analytic techniques (e.g. systems analysis, Program-Based Budgeting, etc.) to government agencies.[83] In education in particular, the belief was that the introduction of these techniques into federal policy would secure greater accountability and efficiency in the use of federal funds and greater equality of student outcomes. The government would secure these outcomes by requiring institutions receiving federal funds to collect and report more information about the race, ethnicity, class, and gender of the student populations that they served.[84]

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[82] See: Janet Weiss and Judith Gruber, "The Managed Irrelevance of Federal Education Statistics," in The Politics of Numbers, ed. William Alonso and Paul Starr (New York: Russell Sage Foundation Publications, 1987), 361–91; 1. Maris A Vinovskis, *Changing Federal Strategies for Supporting Educational Research, Development, and Statistics*, (Washington, D.C.: National education Research Policy and Priorities Board, 1998); Ethan L. Hutt, "Surveying the Nation: Longitudinal Surveys and the Construction of National Solutions to Educational Inequity," Ethics and Education, 2016, 1–19.

[83] See for example, Hunter Heyck, *Age of System: Understanding the Development of Modern Social Science* (Baltimore: Johns Hopkins University Press, 2015); Jennifer S. Light, *From Warfare to Welfare: Defense Intellectuals and Urban Problems in Cold War America* (Baltimore: Johns Hopkins University Press, 2003). For an astute contemporary assessment of the trend in education, see H Thomas James, *The New Cult of Efficiency and Education*, (Pittsburgh: University of Pittsburgh Press, 1969).

[84] Since the 1960s the Bureau of Education has coordinated with the Office of Civil Rights to collect racial and ethnic data on studies as required for compliance with Title VI of the Civil Rights Act; the collection of statistics relating to student gender were introduced with Title IX of the Education Amendments of 1972.

Given the increasingly widespread beliefs about the relationship of education to upward mobility and to the country's military and economic competitiveness, these data became influential informational anchors in local and national conversations about education policy. This was especially true in times of national economic stagnation as in the early 1970s, early 1980s, and late 2000s but also more generally as individual states experienced what Isaac Martin has referred to as the "permanent tax revolt" and, more specifically, a declining public willingness to fund higher education through taxes.[85] Within the last decade there have been a number of prominent efforts to make the production and public dissemination of higher education data. In 2006, the Spellings Commission released its report on the future of higher education which implicated the lack of available information as producing barriers to college access, affordability, accountability and innovation.[86] The Commission proposed the creation of a national database that would provide prospective students higher quality information and could be used to hold universities more accountable for student outcomes.[87] Since the initial publication of the Spellings Commission report, these issues have received sustained attention as a result of the postsecondary initiatives of both the Gates and Lumina foundations and the media attention surrounding the publication of Arum and Roksa's *Academically Adrift* (2010) and *Aspiring Adults Adrift* (2014).[88]

Though ever since the time of Charles Judd and professionalization of the registrar's office, colleges have recognized the importance of utilizing student records for institutional research, and the ratcheting up of accountability and equity pressures have altered the incentives of institutional study in both positive and negative ways. For instance, while colleges were carefully monitoring whether veterans were adjusting to student life[89] or whether those admitted on the basis of the GED were achieving the same academic success as their high school graduating peers,[90] the results of these assessments were low-stakes and could be kept within the registrar or institutional research office. These records also tended to be analyzed at the programmatic level rather than with individual course-taking patterns—though this changed with the advent

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[85] Isaac Martin, *Permanent Tax Revolt* (Stanford: Stanford University Press: 2008)

[86] Margaret Spellings and United States. Department of Education, *A Test of Leadership: Charting the Future of U.S. Higher Education* (Washington, D.C.: Department of Education, 2006).

[87] Ibid., 20-22.

[88] For information on the Gates Foundation postsecondary initiatives see: http://postsecondary.gatesfoundation.org/; on the Lumina Foundation see: http://strongernation.luminafoundation.org/report/main-narrative.html. Richard Arum and Josipa Roksa, Academically Adrift: Limited Learning on College Campuses (University of Chicago Press, 2010); Richard Arum and Josipa Roksa, Aspiring Adults Adrift: Tentative Transitions of College Graduates (University of Chicago Press, 2014).

[89] S.H. Kraines, "The Veteran and Postwar Education." *The Journal of Higher Education* 16, no. 6 (1945): 290-298.

[90] See, for example Richard Allen Mumma, "College Record of Students Admitted on the Basis of G.E.D. Tests.," *College & University* 26 (October 1950): 79–86.

of more extensive record keeping and computing power. In the era of the New Public Management, the Spellings Report, and the College Scorecard, the student record is not only something to be passively and retroactively plumbed for insight but something to be actively and prospectively managed. Indeed, at a time when retention rates and gainful employment have become arbiters of institutional legitimacy, the information not recorded or prevented from being record on a student's record—the applicant not enrolled, the course enrollment forestalled—becomes as important as the information that does.

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Even acknowledging these new and considerable external accountability pressures, there are many ways in which these pressures reflect and reinforce long-standing efforts to improve access and articulation. After all, Americans have always preferred lower barriers for entry to higher ones; the reduction of the time to degree to the lengthening of it; a proliferation of credentials to a contraction of them. To that end, the demand by current students for increased options, greater flexibility, faster programs, clearer articulation, and more credentialing is best understood as a continuation of a long, time-honored tradition in American higher education.

Concluding Thoughts, Guiding Questions

While undoubtedly part of a time-honored tradition of cyclical change, meeting the demands of the current era will require schools to do as institutions of higher education have always done: adapt their practices and embrace change. In the context of the student record, the history reviewed here counsels for no specific lessons but does suggest a series of themes and related questions that might guide efforts to adapt practices to address the old challenges and the new:

- The student record has always had multiple audiences and defined the relationship between, among others, students and their institutions; institutions and their recognized peers; institutions and their aspiring peers; institutions and the broader public. How will a reimagined student record address the needs of its multiple audiences, some of whom may not yet be recognized?

- Which experiences and institutions are considered a legitimate part of the American higher education system (and therefore worthy of or capable of granting postsecondary credit/credentials) has always been a contested matter—one settled by mutual cooperation and understanding among professional associations and peer institutions. What governance structures are in place, or can be put in place, to address the challenges that come with the proliferation of new online institutions, programs, certifications, and credentials?

- Throughout the history of the student record innovations have usually been led by some combination of non-profit organizations, philanthropies, and collective institutional action with governments playing a supporting role—usually encouraging or mandating innovations that have already taken hold in the field. What is the ideal role of governments at all levels (local, state, national, international) in shaping the future of the student record?

- The diversity of American educational institutions have long been held together, at least nominally, by the acceptance and issuance of a common academic currency and to mark student progress by the accumulation and redemption of this currency. Efforts to set aside this currency on the grounds that it is unduly rigid or privileges the wrong aspects of education have faltered in their ability to find an academic metric that is sufficiently flexible and interchangeable to meet the needs of students and institutions operating in a deeply interconnected and interdependent educational system. To the extent that reimagining the student record involves (as it has in the past) reimagining the basic academic currency, how will this new currency address the demands for flexibility and interchangeability required by the rest of the system?

- The institutions that generate student records—whatever their form—have always been understood as having an obligation both to their students and to their fellow institutions to record, maintain, preserve, transmit and, more generally, be stewards of their records in perpetuity. In an era of decentralized and ubiquitous record keeping, how will this stewardship be maintained in a rapidly evolving institutional landscape?

- Student records have always preserved (whether intentional or not) a level of anonymity and privacy in accordance with contemporary expectations. Given the unprecedented capacity to collect, preserve, and transmit student information, how will student and societal expectations of privacy be met? How will this new paradigm accommodate the expectations of governments and the public for research and evidence of program effectiveness?