

# NATIONAL STUDENT CLEARINGHOUSE®

2300 Dulles Station Boulevard, Suite 300, Herndon, Virginia 20171 ~ 703-742-4200 ~ [www.studentclearinghouse.org](http://www.studentclearinghouse.org)

---

## **The National Student Clearinghouse's Position on the Establishment of a National Electronic Education Data Exchange Network**

**April 9, 2013**

### **EXECUTIVE SUMMARY**

Given the rapidly increasing mobility of students, there has never been a greater need to enable the efficient and secure exchange of student records, including transcripts and other documents, between institutions. As one of the leading providers of an electronic exchange network and the authorized agent for more than 3,400 colleges and universities, the National Student Clearinghouse is advocating the establishment of policies, guidelines, and procedures that will enable U.S. exchange networks to provide free and open exchange of education documents and data among institutions and the network service providers.

In our view, because the networks exist solely to serve institutions and their students and alumni, it is the nation's institutions – working through their professional organization, the American Association of Collegiate Registrars and Admissions Officers (AACRAO) – that should determine all functionality and drive innovation. Additionally, in order to ensure accessibility by all institutions and their service providers, the networks should be built using standards developed and approved by the P20W Education Standards Council (PESC) in collaboration with AACRAO. Moreover, all network service providers should commit to implementing PESC approved standards and obtaining an annual PESC Seal of Approval indicating a uniform level of implementation.

### **The Current Network Exchange Environment**

Today the education community participates in an electronic transcript ecosystem that consists of numerous network service providers. These providers are not emergent, they are well-established organizations that have been in place for years.

The leading providers include:

- Avow by Parchment
- ConnectEdu
- Credentials Solutions TranscriptsNetwork
- Docufide by Parchment
- eSCRIP-SAFE by SCRIP-SAFE International
- eTranscripts California
- Florida's F.A.S.T.E.R.
- National Student Clearinghouse
- Ohio Board of Regents
- Pearson National Transcript Center
- Texas SPEEDE Server
- XAP etranscriptXchange

These services are provided by a mix of for-profit, not-for-profit, and publicly funded entities. In the commercial space, providers compete on cost, features, and participant coverage. This competition helps keep costs down and inspires continuing innovation.

# NATIONAL STUDENT CLEARINGHOUSE®

2300 Dulles Station Boulevard, Suite 300, Herndon, Virginia 20171 ~ 703-742-4200 ~ [www.studentclearinghouse.org](http://www.studentclearinghouse.org)

---

## **The Need for National Standards**

The good news is that all these network providers use standard EDI, XML, and PDF data file definitions defined by PESC and the AACRAO SPEEDE Committee. The bad news is there is no standard protocol for exchanging files between networks. However, the PESC Common Data Services (CDS) Task Force aims to address this gap by developing technical standards for an open data exchange network for the education community. Any individual institution or service provider using these standards and registered in the service network could communicate directly with the appropriate exchange host for a receiving institution. The CDS Task Force is also developing standards for a registry of participating institutions, which would be replicated across the data exchange network.

The notion of consolidating service providers into a single entity is not the right answer for the education community. Traditionally, the reduction or elimination of competition stifles innovation and ultimately raises costs. Not to mention that it would take years (if ever) for everyone to agree and convert to the single platform. The new CDS standards would allow providers to continue to differentiate on functionality, while providing a standard means for exchanging data between participating institutions. Examples of this model are the CommonLine/CommonRecord and Meteor initiatives in the student lending industry. Competing organizations came together to agree on common data exchange formats along with policies and procedures for the exchange, aggregation, and display of data. At the same time, these organizations competed on programs, features and prices, resulting in a rich set of customer offerings.

## **Reflecting the Values and Principles of the Education Community**

As the Clearinghouse was asked to assume management of the Texas Server by the University of Texas at Austin, we concurred with UT Austin's view of the basic values and principles they had used to manage the server. Namely,

- Institutions want to serve their students and alumni.
- Institutions must specify parameters for assigning access rights to educational records.
- Institutions must articulate these requirements to service providers.
- Service providers must decide how to meet the requirements in a cost-effective way.
- Standards play a critical role in enabling cost-effective implementation.
- Access to the exchange networks should be available for free to institutions sending and receiving via multiple networks.
- Network service providers should provide free exchange of documents between service provider networks.

# NATIONAL STUDENT CLEARINGHOUSE®

2300 Dulles Station Boulevard, Suite 300, Herndon, Virginia 20171 ~ 703-742-4200 ~ [www.studentclearinghouse.org](http://www.studentclearinghouse.org)

---

Additionally, the Clearinghouse's view as a nonprofit service provider is:

- Our nonprofit mission is to serve the education community by facilitating the exchange and understanding of student data.
- All data exchange platforms should provide free exchange of data for the benefit of their customers.
- Schools must drive innovation and new functionality, either directly or through their advocacy associations, such as AACRAO and the SPEEDE Committee.
- Service providers must help set standards, along with institutions and stakeholders, within the PESC standards setting framework.
- PESC must provide the governance framework for standards, and must validate implementation of standards through activities, such as the PESC Seal of Approval.
- Service providers must commit to each other and the education community to implement new standards on an agreed-upon timetable.
- Service providers that do not implement new standards in the agreed-upon timetable risk inoperability with other service providers, reduced customer satisfaction, and ultimately, loss of customers.

## **Governed by the Education Community**

The Clearinghouse currently leverages AACRAO and PESC to provide the governance and electronic standard setting bodies for the education community. The AACRAO SPEEDE Committee represents postsecondary institutions in U.S. and Canada. The Committee works closely with PESC and participates in the PESC workgroups that are responsible for setting standards and assessing implementation.

PESC is facilitating the following initiatives that directly impact the education record space:

- **Education Record User Group (ERUG)**: Focuses on the utilization and development of standardized, electronic transcripts, and serves as the development vehicle for future releases of the standards.
- **Common Data Services (CDS) Task Force**: Focuses on developing standards for an open data exchange network for the education community.
- **PESC Seal of Approval**: A formal process governed by PESC members that is designed to communicate to the community-at-large that an organization has uniformly implemented an approved PESC standard. Implementers can use the Seal of Approval to market products and services to demonstrate alignment and interoperability.

# NATIONAL STUDENT CLEARINGHOUSE®

2300 Dulles Station Boulevard, Suite 300, Herndon, Virginia 20171 ~ 703-742-4200 ~ [www.studentclearinghouse.org](http://www.studentclearinghouse.org)

---

## **A Commitment from the National Student Clearinghouse**

In summary, the Clearinghouse recommends leveraging what is working today: the current electronic transcript ecosystem that consists of numerous network service providers.

In addition, we propose that AACRAO and PESC be the governance and electronic standard setting bodies for the education community and all network service providers, including the Clearinghouse. We encourage network service providers to utilize the PESC Seal of Approval process to validate conformance to standards.

On our part, the Clearinghouse commits to participating in the free and open exchange of education documents and data among network service providers and ensuring our data exchange platform conforms to PESC standards. Lastly, the Clearinghouse would be happy to join other network service providers in the timely, coordinated rollout of new PESC standards across network providers.