STUDENT DEFENSE

NATIONAL STUDENT LEGAL DEFENSE NETWORK

Securing Transcripts and Records When Schools Fail

How Accreditors and States Can Protect Students

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Introduction

In light of recent college and university closures, the higher education community must pay more attention to how students fare when their school shuts down. A sudden school closure can be incredibly disruptive for students, derailing their education and requiring them to navigate complex decisions regarding the transfer of credits, re-enrollment at another school, teach-out opportunities, and securing their academic transcripts and records for future use.

In the Summer of 2019, Student Defense convened a meeting of accreditors, state authorizers, state attorneys general and other interested individuals to discuss the issue of record preservation in the context of higher education. This paper draws upon that group's input, as well as upon recent developments in higher education, and lays out recommendations and topics for further consideration.[1]

Lost Records are Devastating

In the chaos of a school closure, students may face tremendous obstacles retrieving their records from a registrar that is likely shedding staff and resources. These obstacles include extreme delays in transcripts processing, failure to transfer records to a new custodian, transcripts distributed with minor or significant errors, or, in some cases, the destruction of irreplaceable records.[2]

Losing records can be devastating to students, financially, academically, and personally.[3] For institutions that cease operations altogether, it is important that a system is set up so students can recover records immediately and into the future. Without access to academic records, former students will be unable to continue their studies by enrolling in a new institution, transfer credits, potentially support a closed school loan discharge application, or even apply for jobs. This is why at least some states mandate academic transcripts are available for fifty years or indefinitely.[4]

Any solution to record preservation that depends on the closing institution to adequately maintain or transfer records is likely setting students up for failure.

Academic transcripts are largely still preserved on paper or electronically within an institution's own filing system. If a school is closing, it is easy for records access to be deprioritized or compromised. Experience with recent closures shows that institutions on the brink of closure frequently, and unsurprisingly, suffer from depleted financial and staff resources.[5] Meanwhile, a closing school will likely experience a much higher than usual demand for records, as students need their records to enroll elsewhere. Simultaneously, alumni often try to secure records for future needs. For example, shortly after the shutdown of Dream Center schools—including Argosy University and the Art Institutes—more than 40,000 students submitted requests for transcripts.[6] Many of these students reported receiving error-laden transcripts printed on plain paper without official seals, with no opportunity to fix mistakes with a defunct registrar.[7]

If a prospective employer or another institution requests a transcript or other record, and the student only has an erroneous and unconvincing piece of paper, it is easy to see how employment opportunities and further education could slip away.

This paper lays out three broad recommendations for how states and accrediting agencies can help ensure that school closures do not impede students' access to academic transcripts and other important records.

1. Requiring institutions to ensure transcript and record availability through concrete procedures *before* they reach a crisis point;

2. Establishing secure, independent repositories for transcripts and academic records; and

3. Modernizing rules and removing barriers to allow for new, digital approaches to records management.

Overview

How are transcripts preserved today?

Accreditors and state authorizers must play a significant role in transcript preservation at closing schools. This can happen at the moment of the closure, either in the context of teach-out agreements or otherwise. But ideally, priorities and strategies for record preservation must begin well before the school is at a moment of crisis.

In some states, students may be able to access a state depository of transcripts from closed schools. But even many of these systems are imperfect. For example, the Texas Higher Education Coordinating Board (THECB) maintains records for some closed schools that it had previously authorized.[8] Although promising, the THECB website lists only two closed schools for which it maintains records, while many more have closed in Texas in recent years. Maryland and the District of Columbia have established a hybrid model of a centralized depository whereby they can step in as a depository for records from closed institutions that were unable to secure a new records custodian through a teach-out agreement. Unfortunately, many state authorizers do not maintain *any* centralized depositories for transcripts, and merely provide information platform directing students to transcript retrieval sources based on information provided by the closed institution.

Accreditors are not necessarily in a better position than state authorizers to assist students and alumni seeking to retrieve records Nevertheless, certain accreditors have used website platforms and staff resources to help students locate transcripts by providing key information. For example, the website for the New England Commission of Higher Education provides links and contact information for the entity holding transcripts. Similarly, the Middle States Commission on Higher Education dedicated staff to assist students trying to locate records after the Art Institute of Pittsburgh closed.[9] But accreditors and state authorizers are limited in their ability to help students obtain transcripts after a school closure, unless appropriate precautions are taken in time.

The Move Toward Digital Transcripts

Given the problems in this area, states and accreditors must establish requirements for institutions to digitize student transcripts. A number of entities offer digital transcript solutions and the space is likely to evolve. For example, the National Student Clearinghouse operates the Electronic Transcript Exchange, which enables institutions and other entities to share documents with each other.[10] Various private companies[11] offer digital transcript services. Parchment, for example, has secured partnerships with a number of states, including Kentucky and West Virginia, securing and distributing academic transcripts for secondary and post-secondary institutions.[12] The Digital Credentials Project is an initiative of nine universities working "to design an infrastructure for digital verifiable credentials of academic achievement."[13] That international initiative, which includes Harvard, MIT, UC Berkeley, and UC Irvine, aims to create a standard credentials platform that all educational institutions could use.

Digital transcripts can be beneficial to both institutions and students, while offering greater accessibility at a lower cost. The use of electronic transcripts has other advantages as well, with some solutions including capabilities such as links to course information and students' work, secure delivery, and tamper protection. Moving to electronic records also eases the burden of students looking to access the records; there is a real difference for students being able to review and order a transcript through a web portal versus having to collect records in some other fashion.

In contrast to situations where paper records have been destroyed, in cases of school closures that have involved digital records, transcript-access problems have proven to be fixable. For example, Marian Court College closed abruptly (*i.e.*, with only 15 days' notice) in June 2015. At the time of its closure, transcripts were maintained in three different systems. Following the closure announcement, staff attrition was quick. The Massachusetts Department of Higher Education then ordered the religious entity that ran the school to retain an outside consultant to find a way to provide access to student transcripts.[14] Digital credentials company Parchment subsequently moved the transcript service onto an online platform, and transcript requests have reportedly been processed with far greater speed[15].

Similarly, the Maryland Higher Education Commission used Parchment to restore 7,000 official ITT transcripts of Maryland students after the school closed in 2016.[16]

Successful efforts to protect records will include elements of the following recommendations, which were informed by the input of the convening attendees.

Recommendations

1: Requiring Institutions to Protect Records Before a Crisis

In records preservation, an ounce of prevention is worth a pound of cure. Regardless of the specific policies implemented by states and accreditors, no measures will be fully effective if implemented only once an institution is in crisis.

During the convening, participants discussed two broad models with different advantages and disadvantages. In the first model, states or accreditors would impose certain record preservation requirements on institutions identified as "high risk." Although the criteria for making this determination is beyond the scope of this paper, the criteria are undeniably fact-specific and will likely vary by state or accreditor.

In the second model, state authorizers or accreditors would impose a minimum level of records preservation preparedness for all institutions. Under this approach, all institutions would be required to take simple and inexpensive steps to move their routine recordkeeping practices in line with an industry-wide standard. The goal here would be to ensure that, at a minimum, if a school failed suddenly it would be possible for an outside party such as a state to step in and manage data retrieval for affected students.

Financial Trigger Model

At a minimum, any institution determined to be at a heightened risk of closure should be required to secure student transcripts and records. There are a number of ways by which that determination could be made. For instance, some convening participants suggested at institutions that are placed on heightened cash monitoring (HCM) by the Department of Education should also have a contingent requirement to secure transcripts immediately, as a significant percentage of schools on HCM 1 or 2 will end up closing. A variety of other triggers could be devised, stemming from rubrics including WASC's For Profit Framework, the financial viability model under development in Massachusetts[17], or others. The State Higher Education Executive Officers Association (SHEEO) has also published recommendations for state agencies, looking at how monitoring financial trends year-over-year can help identify trouble before the breaking point.[18]

The actual mechanism employed under this model may be including records-preservation requirements in teach-out agreements. Accreditors can include specific instructions about academic records when imposing teach-out agreements.[19] Any teach-out agreement should provide a way for affected students to complete their study at another institution and ensure students have access to their academic transcripts and other records in the future. Teach-out agreements should ensure that students displaced by a closure have no-cost access to academic transcripts (it is typical for already-graduated students to pay for copies of transcripts, but virtually every displaced student will need a transcript and it would be unfair to make them pay for something caused by the school's closure).

It may not be prudent to wait until the point at which an institution has a teach-out agreement in place. The decision of when an accreditor should impose heightened requirements is complicated and highly fact dependent. However, resources are available to accreditors to assist determine viability of institutions of higher education. For instance, the WASC Senior College and University Commission (WSCUC) has developed a For-Profit Assessment Framework to help with the task.[20]

Advantages: Imposing special records requirements only on schools at a heightened risk of closure means that most schools, which realistically are extremely unlikely to close, are not burdened unnecessarily. This approach may be more politically viable, and also may avoid spending regulators' time and attention on schools where transcript availability problems are improbable.

Shortfalls: Existing models for predicting a school closure have well-documented shortcomings (such as the Department of Education's Financial Responsibility Composite Score, which is a trailing indicator wholly incapable of catching problems that take less than two years to unfold), or they are relatively new and untested. If measures are imposed when a closure is imminent, schools have little incentive (or means) to cooperate.

Requirements under this model may also be imposed too late. Institutions on the brink of closure have little incentive to implement time or resource intensive policies for record retention if they believe they are headed to a closure.

Universal Preparedness Model

Under this model, every institution would be required to have a formal records preservation plan in place, with the added benefit of protecting against unexpected events such as natural disasters or fires. Digital records are easier to back up, and to preserve in a distributed fashion. While Student Defense and this paper do not endorse any particular service provider, the electronic transcript company Parchment participated in the convening session and offers many of the kinds of products available in the market today.

The best time to preserve records is before problems arise. Institutions should maintain their records in a standardized, modern format with appropriate and well-documented metadata. By doing so, the institutions ensure that those records can be imported into another database, such as that of a state authorizer or outside vendor, with relative ease.

Advantages: Regardless of external requirements, virtually every institution is going to preserve academic records in some manner of digital database. Many institutions already contract with outside vendors for this very purpose, including institutions at negligible risk of closure. If it is

cost-effective for those schools to do so, it should not be particularly burdensome for more schools to do something similar. Any records-preservation guidelines could be crafted to make it easy for schools to come into compliance, perhaps by setting targets for a transition over time.

Shortfalls: The vast majority of institutions are not at risk of closure, and imposing new requirements on them could be seen as unfair.

Our recommendation is a hybrid of both models, establishing a minimum set of requirements for all institutions, while imposing strict preservation and retention requirements on high-risk institutions, such as those on HCM 1 or HCM 2.

Every institution should maintain vital records in digital format. There is no justification for keeping important documents solely in paper form, given the well-established risks of loss or destruction. States or accreditors should set digital record storage guidelines in consultation with technical experts (from third-party vendors or state archival bodies) and give all authorized or accredited institutions a deadline for converting their records to an acceptable form.

For most institutions, and most records, the situation is not dire. It is the severity of the potential harm, however, that makes preventive action so important. Fortunately, the necessary interventions will largely be low-cost and administratively simple to implement. It's likely that the vast majority of schools will already use acceptable digital records for many relevant documents. Based on our experience, the documents least likely to already exist in backed-up digital form are things like clinical records or evaluations held by departmental offices instead of by the registrar.

Upon being placed in the high-risk category, these institutions should be required to either contract with an outside vendor or work directly with their state to proactively transfer and preserve records. At that time those institutions would also be required to pay for, or post a bond for, whatever records management would be necessary in the event of their closure. Ideally this would happen in the context of the institution also being required to have teach-out agreements to ensure students' smooth transition to other schools.

Who is going to pay for all of this?

While many strategies to improve practices may be low cost, funding the necessary changes will require new revenue.

States could simply pay for a repository's operations out of general funds, but another option identified by convening participants is to require institutions to pay into a dedicated fund (or post a bond) at the time of state authorization. Student Defense does not have a precise estimate of the actuarial risk, but an annual fee in the general vicinity of one dollar per student seems likely to be sufficient to cover the cost of digitizing, transferring and storing academic records in the event of a closure (possibly supplemented by a nominal per-transcript fee charged to students at the time of a request).

The current business models of some digital transcripts companies largely rely on after-the-fact funding stream generated by students paying to access their transcripts.

Other considerations for states and accreditors
What do plans look like?

Institutions' records-preservation plans should be both location specific and tailored to each school's actual operations. Plans should be granular in detail, showing on at least a department-by-department basis: what kinds of academic records exist and how they are stored and documented.

Addressing transcripts that contain errors

As noted above, students displaced by school closures sometimes discover that their transcripts are inaccurate. Fixing transcript errors is a difficult issue, as only the school where the credits were earned has the authority to edit the transcript. The Minnesota Office of Higher Education allows closing schools to maintain a limited authorization for the purpose of fixing transcript errors for a certain extended period of time.

Some participants proposed requiring every school to send its state authorizer a complete copy of all transcripts at the conclusion of each academic year, for the purposed of being archived and only used in case of the institution's closure. The full ramifications of that policy may be complex, and it is unclear how much it would cost. One disadvantage to note is that an annual backup would be of limited utility for students displaced in the middle of an academic year. A holistic approach to records preservation, focused on ensuring all records are preserved, may be more nimble.

2: Ensuring that records are stored in safe, independent repositories

When considering where to store records from closed schools, a central repository has obvious advantages, not least that it avoids relying on a failing institution itself. However, centralizing storage also centralizes risks. System design and reliability should be key considerations, and states should ensure a repository has sufficient administrative resources to handle spikes in demand. There may be FERPA considerations as well. Additionally, any new repository is going to be tasked with taking in files from institutions in chaotic, crisis conditions. Employees at a soon-to-be closed school may not have an incentive to adequately complete the transfer process.

The ideal setup for a repository may vary depending on a state's regulatory regime and a single model may not be appropriate everywhere. For example, certain states have separate commissions overseeing different types of institutions, i.e. vocational schools vs. degree-granting colleges.[21]

Participants in the convening noted that designating the state as a repository offers a number of advantages over relying on private companies or nonprofits. States have a great deal of expertise in archiving records and are at no risk of closure. Nevertheless, it may be appropriate for states to contract with a private vendor to manage intake, storage, and retrieval processes. Such an arrangement should also have appropriate protections to ensure that the state is able to retrieve data in the event of the vendor's closure.

3: Engineering future-proof solutions

The transition to digital transcripts appears well underway and is likely to accelerate over time. Any solutions must consider how, or whether, existing statutes and regulations, or accreditors' policies, may interact with emerging technologies. Services are designed to facilitate compliance with FERPA, the Higher Education Act and other laws—as laws change, the technology may need to adapt as well.

Policymakers must make decisions regarding how long records should be available and how repositories can safeguard data integrity and student privacy. States and accreditors should consider a standardized approach to these issues. The costs involved in securing a transcript are almost entirely concentrated in the initial importation of the records into the archival system. The marginal expense of data storage for each individual record is negligible and will likely shrink over time. Thus, repositories should be designed to hold records for a very long time, or indefinitely. To the extent that a specific time limit is needed, a length such as 75 years would be sufficient to ensure that virtually no one will end up needing access to a deleted record.[22]

Convening participants generally agreed that repositories should treat student records as sensitive and valuable data, protected by the same types of safeguards that financial institutions use to protect customer data. Repositories should also maintain some type of offline or protected backup storage, so that irreplaceable records could not be deleted by ransomware or user error.[23]

The technical aspects of privacy protection are beyond the scope of this paper, but any system containing private information of thousands or perhaps millions of individuals must incorporate industry-wide best practices around encryption and cybersecurity.

Further Discussion
What kinds of records need to be preserved?

In the course of completing an academic program, students generate a variety of important documents they may need to access in the future. There are some record types that will be universal, e.g. transcripts showing courses taken and grades earned, and diplomas certifying the completion of courses of study and granting of degrees.

Within a given school, different departments and courses of study may generate other categories of records: clinical coursework for program in psychology, nursing, or other caring professions.

For programs that incorporate a clinical element, records may include clinical documents and evaluations, which may be maintained separately from other academic records. For

students who receive health care through their school's clinic or community health center, immunization records may also form part of the students' body of vital records.[24]

Client Spotlight: Irreplaceable Clinical Records

In the course of litigation around the shutdown of Argosy University, Student Defense became aware of a situation involving graduate students at Argosy's Georgia School of Professional Psychology. Approximately 60 students had their clinical training files shredded, causing significant hardship as they need those files to transfer to other institutions, to apply for internships, and to become professionally licensed. Not only were these files not stored in a central location such as Argosy's general registrar's office, they were distributed among paper storage cabinets on different floors of the facility, without any backups. Student Defense is currently representing several affected students in the ongoing federal receivership, exploring whether the students have any potential recourse, but the end result is still, at best, uncertain.

An individual's story helps makes the impact clear: One Student Defense client was a third-year student pursuing a doctorate in psychology at the Georgia School of Clinical Psychology at Argosy University's Atlanta Campus when it closed in March of 2019. After the closure and the destruction of her records, she moved at personal expense to the Washington, D.C. area to transfer to the Chicago School of Professional Psychology where she has struggled to overcome the loss of her vital academic records. After spending years and many thousands of dollars at the Argosy campus, she must make do without documents including her clinical competency exam results, professor evaluations, and dissertation defense paperwork. This has greatly hampered her ability to apply for post-doctoral internships, a prerequisite for obtaining a license to practice. Adding to her stress, her new school has also expressed concern that her missing documents could affect its own accreditation status.

Preserving records documenting clinical practice is extremely important, as in many occupational fields there is simply no getting around the clinical hours requirement for licensing. Additionally, some state licensing bodies require that prospective practitioners spend at least two years doing coursework at the school from which they graduate. When schools close, students close to completing these programs are put in a difficult bind. Not only may they be dealing with lost records, they may also have to repeat years of coursework at whatever school they are able to transfer into. Any acceptable records-preservation plan must explicitly ensure that clinical records are preserved (and based on Student Defense's experience with Argosy, an offsite digital backup should be non-negotiable).

The marginal cost to these institutions is minimal compared to the devastating effects that a closure has on the lives of thousands of students unable to access records. In a such a large and diverse sector, some closures are inevitable. It is time for the entire higher education community to take action. States and accreditors must ensure that student transcripts and records are preserved so that students do not suffer unnecessarily from their school's misfortune.

Conclusion & Next Steps

Student Defense recommends that state authorizers and accreditors take immediate action to ensure the preservation of transcripts for students at schools at a known risk of suffering an institutional or campus closure. As a first step, states and accreditors should establish requirements that all institutions receiving Title IV funding through the HCM 1 and HCM 2 methods of payment must digitize student transcripts and additional records as a condition of continued state authorization or accreditation. State authorizers and accreditors should also require new applicants for authorization and accreditation to adopt a method of storing transcripts electronically as a condition for initial approval.

States and accreditors should then consider implementing tests that include factors such as financial health and closure risks to trigger the requirements for schools to digitize transcripts. As discussed elsewhere, if schools store records in standardized digital formats with well-documented metadata, it will not be difficult for a private vendor to import the data into the vendor's system for subsequent archiving and retrieval. The costs of storage and retrieval could be covered by some combination of an annual fee assessed on institutions by the state, and nominal charges to students upon request of the records.

Endnotes

1   This paper does not represent the official views of individual participants or organizations.

2   Michael Vasquez, 'They're Not Even Making Sure They're Correct': Botched Transcripts Add Insult to Injury for Students Abandoned by Dream Center Closures, The Chronicle of Higher Education (Apr. 24, 2019), https://www.chronicle.com/article/They-re-Not-Even-Making/246173

3   Student Defense has outlined many of the dangers posed by sudden closures in a white paper, "School Closures & Student Harms: Recommendations for Accreditors."

4   Washington, California and Pennsylvania require institutions to make academic transcripts available to former students either indefinitely or for 50 years, even if a school closes. Wash. Rev. Code Ann. § 28C.10.160 (West 2019); Cal. Educ. Code § 94900 (West 2019); 22 Pa. Code § 73.23 (2019)

5   In June 2015, Marian Court College in Massachusetts closed due to enrollment and financial difficulties. Most staff left the college within days of the closure. Also, Bacone College experienced a backlog of transcript requests, and most staff left the office after school suspended operations.

    See Paul Leighton, Three years after closing, college transcript problems 'resolved', The Salem News (June 6, 2018), https://www.salemnews.com/news/local_news/three-years-after-closing-college-transcript-problems-resolved/article_dc961acc-4046-5d09-b429-b82e5ab85561.html

    and Michelle Charles, Bacone College closure impacts Pawnee Nation College: PNC students warned to get transcripts ASAP, Stillwater News Press (May 9, 2018), https://www.stwnewspress.com/news/local_news/bacone-college-closure-impacts-pawnee-nation-college-pnc-students-warned/article_fe63b1e0-5922-571d-bb68-02c408dcb349.html

6   Michael Vasquez, 'They're Not Even Making Sure They're Correct': Botched Transcripts Add Insult to Injury for Students Abandoned by Dream Center Closures, The Chronicle of Higher Education (Apr. 24, 2019), https://www.chronicle.com/article/They-re-Not-Even-Making/246173

7   Id.

8   Texas Higher Educ. Coordinating Bd., Student Academic Records Maintained by the Texas Higher Ed. Coordinating Bd., http://www.thecb.state.tx.us/index.cfm?objectid=4116E7F0-20C0-11E8-BC500050560100A9 (last viewed July 11, 2019)

9   Middle States Commission on Higher Education, MSCHE Statement on the Sudden Closure of the Art Institute of Pittsburgh, https://www.msche.org/2019/03/09/msche-statement-on-the-sudden-closure-of-the-art-institute-of-pittsburgh/ (Last visited July 16, 2019)

10 National Student Clearinghouse, Electronic Transcript Exchange Registry, https://studentclearinghouse.org/colleges/etx-registry/

11 Paul Fain, Digital Upgrade for Transcripts, Inside Higher Ed (Jan. 21, 2014), https://www.insidehighered.com/news/2014/01/21/colleges-move-digital-transcripts-managed-outside-firms

12 See Kentucky Council on Postsecondary Education, Press Release, All Kentucky Public High Schools Now Online with Electronic Transcripts https://education.ky.gov/districts/tech/eTrans/Documents/eTranscript_Joint_Release-KY_Public_High_Schools.pdf; and West Virginia Dep't of Education, West Virginia's eTranscript Initiative, https://wvde.state.wv.us/counselors/eTranscripts.html

13 Digital Credentials, https://digitalcredentials.mit.edu (Last visited July 16, 2019)

14 Paul Leighton, Three years after closing, college transcript problems 'resolved', The Salem News (June 6, 2018), https://www.salemnews.com/news/local_news/three-years-after-closing-college-transcript-problems-resolved/article_dc961acc-4046-5d09-b429-b82e5ab85561.html

15 Parchment participated in the Student Defense convening. This paper is not an endorsement of Parchment's services specifically.

16 Maryland Higher Education Commission, MHEC Makes ITT Technical Institute Official Academic Transcripts Available to Students, https://mhec.maryland.gov/Pages/06-18-2018.aspx

17 Rick Seltzer, Regulating College Closures, Inside Higher Education (January 23, 2019), https://www.insidehighered.com/news/2019/01/23/massachusetts-regulators-propose-efforts-protect-students-unexpected-college

18 State Higher Education Executive Officers Association, Monitoring And Assessing The Financial Health And Risk Of Colleges And Universities: Recommendations For SHEEO Agencies http://sheeoorg.wpengine.com/wp-content/uploads/2019/03/SHEEO_HealthRiskWP.pdf

19 The Department of Education's regulations require an institution to submit a teach-out plan to its accreditor in a variety of circumstances. 34 C.F.R. § 668.14(b)(31).

20 WASC Senior College and University Commission, For-Profit Assessment Framework, https://www.wscuc.org/content/profit-assessment-framework

21 In Massachusetts, for example, at least three separate agencies maintain information about the location of transcripts for closed institutions. The state Department of Higher Education covers degree-granting colleges and universities; the Massachusetts Division of Professional Licensure, Office of Private Occupational Education covers private business, correspondence or trade schools; and the Department of Public Health covers student records for closed hospital-based nursing programs. See Massachusetts Dep't of Higher Education, "Records from Closed Institutions" https://www.mass.edu/forstufam/diplomas/closedinst.asp (Last visited July 16, 2019)

22 Different retention periods may be appropriate for different types of records. ACCSC requires its institutions to maintain transcripts indefinitely, and student financial records for at least five years. See: http://www.accsc.org/UploadedDocuments/ACCSC%20Standards%20of%20Accreditation%20and%20Bylaws%20-%20070116.pdf

23 Cities have been struck by ransomware attacks in growing numbers and have lost vital data that was not backed up. See: Kevin Collier, Crippling ransomware attacks targeting US cities on the rise, CNN (May 10, 2019), https://www.cnn.com/2019/05/10/politics/ransomware-attacks-us-cities/index.html

24 Convening attendees noted that Parchment currently preserves immunization records for many high schools that contract with the company.