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## The status of the in loco parentis doctrine in American higher education

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## The status of the in loco parentis doctrine in American higher education

### Abstract

Though the concept of in loco parentis as applied to higher education lost its legal status during the late 1960s and early 1970s, many higher education authorities believe that the underlying philosophy of in loco parentis is re-emerging. This paper examines the history of the in loco parentis doctrine in American higher education. By drawing on a number of sources, the fluctuating legal and philosophical applications of the doctrine are traced from their origins in colonial America to their status in the higher education system of today.

THE STATUS OF THE IN LOCO PARENTIS DOCTRINE  
IN AMERICAN HIGHER EDUCATION

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Presented to  
The Department of Educational Administration  
and Counseling  
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In Partial Fulfillment  
of the Requirements for the Degree  
Master of Arts in Education

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William Lee Maravetz

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Though the concept of in loco parentis as applied to higher education lost its legal status during the late 1960s and early 1970s, many higher education authorities believe that the underlying philosophy of in loco parentis is re-emerging. This paper examines the history of the in loco parentis doctrine in American higher education. By drawing on a number of sources, the fluctuating legal and philosophical applications of the doctrine are traced from their origins in colonial America to their status in the higher education system of today.

#### Historical Foundations

For most of the history of higher education in America, the concept of in loco parentis (literally, "in place of the parent") defined the relationship between administration and student. The origin and development of this relationship is not surprising given the nature of early American colleges. As Commanger (1976) described it:

The college was designed, in the 18th and much of the 19th century, for very young men. It was in many respects what our preparatory schools are now . . . And this leads to (another) quality which distinguishes the American college from the university: the practice of in loco parentis by the college authorities. This was logical if students were indeed children. (p. 4)

This environment led to an almost absolute control of students by faculty and administration. Admittance and dismissal, course of study, living arrangements, appearance, social and religious activities, as well as most other aspects of student life, were dictated by the college administration. Students were simply given one choice: either abide by the rules or face summary discipline. The college had the final (and often the only) say in regulatory matters.

As both a philosophy and a practical means of governance, in loco parentis thrived in most American higher education environments until the latter half of the 19th century. It was at this time that American colleges began to shift from their English heritage toward a system of higher education based upon the German universities. McGrath (1970) stated:

Into the middle of the 19th century American colleges retained their English tradition of cloistered paternalism; and for every whipping they administered, their students could retaliate with obstinacy. But with the trend of American higher education toward German ideals after the Civil War--that of scientific research, of graduate instruction, and of intellectual concern rather than pietistic obedience--the existing colleges began to relinquish their severe patriarchal supervision. . . (p. 18)

While the faculty and administration of many American colleges and universities began to emulate the

German model of higher education, the characteristics of the American student-body became more and more divergent from its European counterpart. Unlike most Old World universities, which continued to admit a relatively select number of students, American higher education began to attract students in increasing numbers. Trow (1988) noted that in 1880, England had four universities for a population of 23 million. At the same time, the 3 million residents of the state of Ohio were served by 37 institutions of higher education. The United States entered the Civil War with about 250 colleges. According to Trow, by 1910 the U.S. had nearly a thousand colleges and universities with well over 300,000 students. This was at a time when France had 16 universities with a total enrollment of about 40,000, nearly the number of American faculty members alone.

As the sheer number of students increased during the 1800s, so, too, did the diversity of the students. No longer were students solely males in their mid-to-late-teens. Differing mixtures of age, gender, race, and life-experiences began to pepper the formerly homogeneous student-bodies. Such a situation lends itself to a dichotomy regarding the application of the

in loco parentis doctrine. Older, more mature students, some having lived independently of their parents for lengthy periods of time, began to make their way into higher education. The idea of an institution acting with parental authority became harder to justify, much less enforce. Yet, the increasing number of students meant there was need for efficient governance of students. There was also the issue of the mixing of the sexes. These factors supported the continuance of in loco parentis as the status quo. And, in fact, the status quo did prevail. The ripples of change could be faintly seen, but would not be felt for another three generations.

#### Affirmation in the Courts

In loco parentis did not stand on its espoused philosophical merits alone. It was bolstered by judicial support as well. The in loco parentis doctrine has foundations in early English common law. This doctrine, while implicit in the supervision of students since the founding of the earliest American colleges, was first applied in a legal sense to American higher education in 1913. The court of Appeals of Kentucky, in ruling for the College in *Gott v. Berea College*, stated:

College authorities stand in loco parentis concerning the physical and moral welfare and mental training of the pupils, and we are unable to see why, to that end, they may not make any rule or regulation for the government or for the same purpose. (Gott v. Berea College, 156 KY. 376, 161 S.W. 204, 1913)

It is ironic to note that the case against Berea College was not brought to court by a disgruntled student. It was a local businessman who, feeling that the college's rules against students patronizing his establishment amounted to an economic death-sentence against him, challenged the authority of school administrators to establish rules regarding extra-curricular behavior. The decision against J. S. Gott set a legal precedent that prevailed for almost 50 years.

Regarding this decision, Kaplin (1985) wrote, "In placing the educational institution in the parents' shoes, the doctrine permitted the institution to exert almost untrammelled authority over students' lives" (p. 4).

According to Kaplin, students were also prohibited from laying claim to constitutional rights in the college environment. Noting that the U.S. Constitution had no application in private education, he addressed the issue of public institutions with reference to

Hamilton v. Regents of the University of California, 293 U.S. 245 (1934). In this case, the court upheld an order that student conscientious objectors must take military training as a condition of attending the institution. Kaplin wrote that with this ruling the courts accepted the idea that attendance at a public postsecondary institution was a privilege and not a right. As a privilege, attendance was open to termination for whatever reasons the institution deemed fit. On campus, at least, students were relegated to the status of minors, free to exercise only those rights which the host institution was willing to give them.

As had happened some 80 years earlier, a war served to mark a change in American higher education. Just as higher education had seen an increase in numbers following the Civil War, Post-World War II America saw an increase in postsecondary enrollment. Kaplin stated that the GI Bill expansion of the late 1940s and early 1950s, and the "baby-boomers" of the 1960s, brought enormous growth to higher education in America. In 1940 there were about 1.5 million degree students in the U.S. By 1955 the number had grown to more than 2.5 million and by 1965 students numbered

more than 5.5 million. As with the post-bellum growth of the previous century, the significance of this growth went beyond the mere magnitude of the numbers.

Kaplin wrote:

As new social, economic, and ethnic groups began to enter this broadened world of postsecondary education, the traditional processes of selection, admission, and academic acculturation began to break down . . . For many of the new students as well older patterns of deference to tradition and authority became a thing of the past--perhaps an irrelevant or even consciously repudiated past. The emergence of the student-veteran; the loosening of the "lock-step" pattern of educational preparation. . . And, finally, the lowered age of majority--all combined to make the in loco parentis relationship between institution and student less and less tenable. . . To many students higher education became an economic or professional necessity, and some, such as the GI Bill veterans, had cause to view it as an earned right. (p. 6)

Despite these changes in American higher education, in loco parentis was still entrenched on campuses across the country, and the courts continued to rule consistently in its favor. As late as 1959, courts were ruling that higher education was exempt from constitutional guarantees regarding the rights of their students. It was in that year that the Second Court of Appeals, in *Steier v. N.Y. State Education Commission* (271 F.2d 150, 2d Cir., 1959), upheld the existence of in loco parentis while denying a student's

due process and right of free speech. The court ruled that attendance at a public institution was a privilege granted by the state, leaving the federal courts with no jurisdiction over the granting of those privileges (Hendrickson & Gibbs, 1986).

This ruling, however, appeared to be among the last adjudicated victories for in loco parentis. Only two years later a series of court decisions began that hammered away at the legal foundation on which in loco parentis had stood for over 300 years. Though the doctrine would not be completely leveled by the courts until the 1970s, the first blows were powerful enough to leave it on very shaky ground. As Ardaiole (1983) put it, "The death knell of the judicial doctrine of in loco parentis on college campuses was sounded in 1961" (p. 15).

#### Reversing Trends

It was in 1961 that the Fifth Circuit Court of Appeals reversed a lower court's ruling regarding the rights of students on campus. The case, Dixon v. Alabama State Board of Education (186 F.Supp. 945, 1960), involved the expulsion of students who took part in an off-campus "sit-in," among other civil rights activities. At issue was whether this summary

expulsion violated Fourteenth Amendment "due process" requirements (Millington, 1979). The lower court cited precedent, stating:

The courts have consistently upheld the validity of regulations that have the effect of reserving to the college the right to dismiss students at any time for any reason . . . . The prevailing law does not require the presentation of former charges or a hearing prior to expulsion by the school authorities. (Dixon v. Alabama, 1960, p. 951)

The appeals court overruled, writing: "The question . . . is whether due process requires notice and some opportunities for hearing before students at a tax-supported college are expelled. . . . We answer that question in the affirmative" (Dixon v. Alabama State Board of Education, 294 F.2d 150, 1961, p. 150).

This ruling signaled a new era in American higher education. It was with the landmark Dixon case that the student-institutional relationship changed from one of in loco parentis to a new one based on the Constitution (Hendrickson & Gibbs, 1986). As a result, students emerged with a new status on American campuses. Under most circumstances students moved from second-class citizenship under the law to being recognized as having enforceable constitutional rights. The court in the Dixon case rejected the idea that

attendance at state institutions was a privilege, and implicitly rejected the in loco parentis concept (Kaplin, 1985).

As students began to find support in the judicial system, other factors began to come into play that would ensure the continuation of legal challenges aimed at campus administration and authority. The civil rights movement of the 1960s forced authorities in all sectors of society to undertake both a legal and, at times, a philosophical change. Individual rights under the Constitution became the watchword. The responsibility to see that these rights were protected on campus fell to the administrators (Ardaiolo, 1983).

The legal weakening of in loco parentis emboldened student activists to push harder for student rights. Besides using the courts, these activists advocated social protests as a means to challenge administrative authority. In writing about the distinction German higher education made between academic freedom for faculty, and freedom for students to arrange their own academic life, Millington (1979) stated, "American college students of course began demanding such a distinction, very dramatically, during the turbulent decade of the sixties" (p. 8).

The invocation of "student power" was heard on campuses across the nation. For student power advocates, the basis for authority on campus was to arise from one fundamental principal--those who must obey the rules should make the rules (Schwartz, 1967). This principle was echoed by those who called for the democratization of the campus, allowing for students to collectively decide rules and regulations (Kramer, 1968). Proponents of student self-government argued that the way to learn personal responsibility was to allow students to practice those responsibilities (Powell, 1971).

The student-power movement sought to go beyond court rulings as a means of effecting change. Schwartz wrote:

Student power should not be argued on legal grounds. It is not a legal principle. Students who argue for "rights" usually fail to explore the reasons for rights. In a university, a right should spring from a premise of education, not a decision of the court, although the two may coincide. (p.5)

The actions taken to secure those rights did, however, often culminate in judicial proceedings. It was the many court decisions that helped to propagate student rights and a backing away from in loco parentis. A victory on a single campus could only be applied

locally. A fight won in the courts had nation-wide implications.

Another blow against in loco parentis came in 1971 with the ratification of the Twenty-sixth Amendment, which lowered the voting age to 18. As a result, many states lowered the age of majority for many or all legal purposes. Most higher education students were now recognized legally as adults, with all the attendant rights and responsibilities.

Much of the reform that had taken place in the previous two decades was summarized in a 1979 court case, *Bradshaw v. Rawlings*. In ruling that an injured student failed to show that the college owed him a legal duty of care, the court stated:

There was a time when college administrators and faculties assumed a role in loco parentis . . . A dramatic reapportionment of responsibilities and social interests (has taken) place. . . At one time exercising their rights and duties in loco parentis, colleges were able to impose strict regulations. But today students vigorously claim the right to define and regulate their own lives. (*Bradshaw v. Rawlings*, 612 F.2d 135, 1979, p. 139; Kaplin, 1985, p. 59)

After being continually struck down by the courts, it appeared that the in loco parentis doctrine had finally succumb. This long-standing relationship

between student and institution was declared to be legally dead.

#### Dead, But Not Gone?

There were those, however, who felt that the philosophical spirit, if not the legal body, of in loco parentis lived on. Changes in the law often fail to produce changes in behavior. While in loco parentis was no longer sufficient to explain the student-institutional relationship, especially in the area of student rights, dicta in many court cases indicated a reluctance to totally abandon the concept (Conrath, 1976; Hendrickson & Gibbs, 1985).

Commanger (1976) wrote that while colleges were abandoning in loco parentis, in many respects they still treated their students as if they were children. He cited the lack of academic preparation among incoming students as one reason for the retention of the parenting function on campuses across the nation.

Pitts (1980) stated that in loco parentis had resurfaced as a variety of student services under the concept of student development, defined by Miller and Prince (1976) as "the application of human development concepts in postsecondary settings so that everyone involved can master increasingly complex tasks, achieve

self-direction, and become interdependent" (p. 3). As Pitts saw it, the concern for student development is, by its nature, a parenting function. He wrote that any differences between past and present are manifested more in the method of parenting rather than a shift away from a parenting function, adding that "the legal status of in loco parentis . . . is of less significance than the question of how colleges are currently seeking to fulfill the basically parental function of fostering the growth of the whole student" (p. 21).

Ballou and Gregory (1986) also saw a connection between the contemporary student development concept and the traditional in loco parentis doctrine. They stated:

While a strict, 1950s-type interpretation of in loco parentis may be dead, what has arisen from its ashes, like a phoenix, is a new form and meaning of the term. This new definition, almost an in loco parentis reinvented, includes both a broader legal responsibility and a new nurturing and developmental function only vaguely called for in the past. (p. 30)

Ballou and Gregory cited the increasing legal, ethical and developmental demands being placed on institutions. They note that under these conditions "Parenting becomes not just a secondary task, but the

foremost task of student affairs professionals" (p. 30).

There are new implications resulting from court rulings which view the relationship between the institution and the student as contractual. While this relationship has long been accepted at private colleges, it has also come to describe the public school domain as well. Strickland (1965) posed the question: "If a college has a contractual right to regulate student morals in some respects, does it have a duty to do so?" (p. 338). Case law at that time indicated that institutions were not bound by such a duty. A decade later, however, contractual obligations and consumer rights began to forge a new relationship between student and institution. Within this relationship the student is seen as a consumer of education, with the institution supplying the product of education. As such, the consumer has a right to receive what was paid for (Fowler, 1984; Hollander, Young, & Gehring, 1985). If parental functions and responsibilities are seen as part of the implied contract, it is incumbent upon the institution to fulfill those functions (Morrill & Mount, 1986).

This notion was echoed by Zirkel and Reichner (1986), who wrote that "along with the delegated discretion for the broad purposes of education school authorities are clothed with corresponding duties" (p. 279). The implication comes from those duties expected of the college, and the implied contractual responsibilities. This emphasis on institutional responsibility was also reflected by Gibbs and Szablewicz (1987). They wrote:

During the 1980s, the college-student relationship began to show signs of change yet again. Students began to expect their colleges to get them jobs, provide them with tuition assistance and establish their careers. Further, the students demanded protections--protections against attack, against harm, and against injuries sustained often due to their own carelessness. In short, students began to ask colleges to take care of them much like their parents did. (p. 453)

Fass (1986) stated that these expectations have led both students and parents to demand that colleges exert administrative authority in order to increase the chances of success during and after graduation. According to Fass, colleges are "being asked to provide levels of support, control, and protection that bear a striking resemblance to some of the in loco parentis expectations of the past" (p. 36).

In contrast to those who sought to shake off the yoke of in loco parentis, some students have appeared favorable toward parental-type regulations in some areas of campus life. Laudicina and Tramutola (1974), while acknowledging the abandonment of in loco parentis, wrote that "it should be noted that students may at times seek a return to the in loco parentis concept where it is of special advantage to them" (p. 7), e.g. preferring more lenient campus regulations to stricter community regulations.

While the democratization of the campus was once viewed as an alternative to an administrating oligarchy, Levine (1986), citing a survey by the Carnegie Foundation, indicated that students were not eager to participate in institutional governance. Students were found to be more focused on career success in the post-college environment rather than the college environment itself.

Fass (1986) cited student attitude surveys and campus reports that indicated a growing willingness to support rules, regulations, and restrictions on individual behavior when such actions were believed to be in the best interest of the college community.

By the end of the 1980s, it appeared that in loco parentis was on the verge of resurfacing as many campuses began to reconsider one legacy of the 1960s, the abandonment of in loco parentis rules (Rachin, 1989).

Collison (1989) wrote that 20 years after the decline of in loco parentis, some colleges and universities were again tightening restrictions on dormitory residents. While some students oppose the new policies, others who are concerned about crime, alcohol abuse, and live-in guests are in favor of the regulations.

While in loco parentis as an overt form of governance may have gone by the wayside, many policies and procedures associated with it may still be applied in the absence of viable alternatives. Boyer (1990) stated:

There was a time when college leaders felt responsible not only for the nurturing of the students' intellectual life, but for the guardianship of their morality as well. The problem today is that while rigid rule making has been abolished, no theory of campus governance has been discovered to replace it. (p. A32)

Government requirements may also help to revive a form of in loco parentis at public institutions.

Laudicina and Tramutola (1974) indicated that there

were a number of cases in which parents complained that their children were allowed to become drug users while attending college. Such claims were dismissed, in keeping with the weakening of in loco parentis. By the 1980s, the Reagan Administration sought to link federal funding with institutional efforts to discourage drug use by students. Curris (1990) stated that there were efforts to alter the university-student relationship as a result of the national crackdown on drugs, and that it seemed that the student-as-adult trend was reversing itself. According to Curris, "(The university is) moving in the direction of greater control over student life (p. E1)."

Thomas (1991) wrote that colleges and universities are faced with newly defined legal duties and responsibilities. The response by some institutions to these obligations is not necessarily a return to an absolute in loco parentis, but does represent a step back from the freedoms given to students since the 1960s.

#### Conclusion

The history of American higher education reveals that in the in loco parentis doctrine has gone from defining the relationship between student and

institution to being declared legally dead. The question remains, however, if there will ever be a revival. Certainly, a reappearance of in loco parentis in its original form is highly unlikely. There are, however, many influences acting on institutions of higher education which may awaken an alternative in loco parentis. Some contend that such a reawakening has already taken place.

For the greater portion of the history of higher education in America, the in loco parentis doctrine was the expedient choice of institutions. The establishment of policies and regulations, their implementation, and their enforcement was under the sole discretion of the administration. Decisions could be made in clear-cut terms. Questions of constitutionality, along with their inherent ambiguity, could be ignored.

In his essay Civil Disobedience, Henry David Thoreau heartily accepted the motto that the government that governs least, governs best. During the 1960s the spirit of Thoreau infused an increasing number of students who heartily accepted the motto that the institution that regulates least, regulates best. The potential for chaos in the absence of regulations meant

that the demands of these students would ultimately be tempered.

Recent years have seen a variety of factors influence the reassertion of institutional control. In the absence of coherent theories of governance, institutions are open to the expediency of in loco parentis, albeit in modified forms.

As long as institutions perceive a need to govern students, are faced with legal responsibilities, and/or pursue an agenda of student development, the issue of how to meet these obligations will be debated. Given the complexities of today's higher education environment, the relationship between the student and institution will continue to be redefined for some time to come.

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