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Historical perspectives and contemporary challenges to education (*Bildung*) and citizenry in the modern nation state: Comparative perspectives on Germany and the USA

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journals.sagepub.com/home/eer**Rose M Ylimaki**

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Abstract

In this article, we provide a comparative analysis of public education in Germany and the US, focusing on historical and contemporary challenges to education, *Bildung*, and citizenry in the modern nation state. In particular, we examine relations among nation building processes and education, transnational discourses, mutual influences, and relations regarding public education over time, and identity building and citizenship within and between federal, nation state and international levels. Comparative methods are utilized to examine policy documents as well as the literature, looking for similarities and differences among key concepts and discourses. The article concludes by pointing out that a number of contemporary developments bringing public education to a crossroads today are not entirely new and that foundations of education theory are still relevant. At the same time, we suggest new cross-national dialogues regarding the challenges bringing public education to the crossroads today.

Keywords

Public education, Germany, United States of America, history of public education, diversity, public education in nation states

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This article explores historical and contemporary relations among education or *Bildung*, nation building processes, and aspects of citizenship education and identity building, comparing and contrasting how ideas and concepts of public education are framing these notions in the United States (US) and Germany. Public education remains the primary model for formal education in many countries including the US and Germany. While neoliberal policies have increased pressures for privatization as well as continuing critiques of public education, in both the US and Germany, approximately 91% of children attend public schools (National Center for Education Statistics, 2018; Statistisches Bundesamt, 2019). Different facets of public education will, thus, be considered by: (a) pointing to the development of public education systems in the US and Germany and by the implementation of public schooling over time and its relation to nation building processes; (b) analyzing some of the transnational discourses on education that were carried on between Germany and the US that both point to similarities and to differences with regard to understandings of public education; and (c) drawing on examples of identity building and (citizenship) education within the frame of public education between regional, federal, national and international levels. While the first two sections of this article analyze notions of public education in a historical perspective, the third section aims to contribute to this reflection on national and transnational influences on public education by referring to contemporary examples of citizenship education and students' identity building which can be found, for instance, in policy documents or school laws.

Context of the US and Germany: a brief introduction

As noted in the introductory article, the US and Germany both have a federal school system and political decisions on schooling are based at the state level. Yet there is a varying degree of decentralization in the US and Germany, with the US representing a particularly decentralized school system due to the strong influence of local governance or school board at each school with regard to school funding and student partition (Alba and Foner, 2015). Germany is situated within the European Union (EU) that is operating as a region state (Steiner-Khamsi, 2014) Thus, education is subject to the principle of subsidiarity and falls into the category of being supported by the EU and while legally binding decision-making rests in the power of each member state, EU recommendations can have an important influence on educational policies. At the same time, recommendations from transnational organizations such as the Organisation for Economic Co-operation and Development (OECD) or the United Nations Educational, Scientific and Cultural Organization (UNESCO) have increasingly influenced education standards and practices in Germany and the US; for example, with regard to accountability policies and influences from international large-scale assessments.

Within the federalist education systems, the US follows the most common organizational model for education in European and Northern American countries with a single structure for elementary education (grades 1–6) and secondary education (grades 7–9, 10–12). In some contrast, Germany has a differentiated system for secondary education. After completion of elementary education at the end of grade 4, German students follow distinct educational pathways leading to different levels of certificate with only the *Gymnasium* or the *gymnasiale Oberstufe* enabling students to take up university studies after the successful completion of grade 12 or 13.

Despite growing pressures for privatization from neoliberal policies worldwide, and growing challenges as well as continuous public critiques, public education remains the primary model for formal education in many countries, including the US and Germany. The legitimacy of public schools was further strengthened by recent studies in Germany and the US (Klemm et al., 2018; Pianta and Ansari, 2018, respectively), showing that there are only very small differences between the learning achievements at private and public schools if it is taken into account that the student

body differs at private schools with regard to relevant characteristics: the socioeconomic status of the parents, the language spoken in the family of the student and the sex of the student. While the US and Germany have a long history of reciprocal influences in education, there are fundamental differences as well, including the influence of mass immigration occurring much earlier in the US.

Comparative methods and key elements

In the remainder of this article, we use comparative methods (Crossley and Broadfoot, 1992) as well as theories of transnational analyses that have developed since the turn of the millennium (Popkewitz, 2013). In so doing, we compare historical documents and policies from two or more entities (Germany and US) by putting them side by side and looking for similarities and differences between them. More specifically, we compare US and German public education systems as they developed historically and in the contemporary situation with mutual influences. We draw on Crossley and Broadfoot (1992: xix) who posit that the comparative must be founded on an analysis of the social and political ideas which the school reflects, for the school epitomizes these for transmission and for progress. In order to evaluate the real meaning of the educational system of a nation, it is essential to understand its history and traditions, the forces and attitudes governing its social organizations, and the political and economic conditions that determine its development. In addition, we heed Kandel's (1959) advice that comparative education is the continuation of the history of education into the present. Thus, we compared the US and Germany in terms of: the history of public education within nation building processes; neoliberal policies and public education challenges; discourse on education within and between the US and Germany; and changing notions of citizenship and identity building among federal, national and international interests. Transnational analysis helps to explain mutual influences and circulation of ideas as well as to retrace developments that can only be fully understood when including a dimension that transgresses the national frame. Popkewitz (2019) points to the characteristics of transnational and comparative history as being 'distinct, yet mutually intertwined' (262). Transfer of educational ideas is never a one-dimensional endeavor. The concept of *policy borrowing in education*, applying to long traditions of policy, theory and practice transfer as well as to recent developments in the field of educational governance actions with an international perspective, has been developed by David Phillips and Kimberley Ochs (e.g. Phillips and Ochs, 2003), Gita Steiner-Khamsi and Florian Waldow (2012) and others. In this context, Steiner-Khamsi (2012: 15) points out that policy borrowing is most closely linked to the local preconditions to which they are applied instead of offering a completely new frame of action.

Drawing on this understanding, our research questions are:

1. What similarities and differences can we find when comparing the historical situation and aspects of the contemporary development?
2. What kinds of transnational discourses and influences can we retrace historically?

In order to answer these questions, we used data from federal and national documents as well as descriptions from the literature. Our project follows prior comparative studies of education in the US and Germany (e.g. Hummrich, 2019; Mintrop and Klein, 2017; Overhoff and Overbeck, 2017). Currently, an intergenerational group of North American (including Castner, Friesen, Henderson, Price and Ylimaki) and German scholars (e.g. Kraus, Su), as just one example, are engaged in a dialogue reconsidering the roots and mutual influences of education. The education theorizing dialogue extends earlier dialogues on 'Didaktik meets Curriculum' organized by Stefan Hopmann in the 1990s and dialogues on curriculum theory, Didaktik and leadership bridged by

non-affirmative education theory organized by Michael Uljens and Rose Ylimaki, 2014–2017 as well as the ongoing dialogue between Germany, the US and other countries organized by DIPF | Leibniz Institute for Research and Information in Education at the annual meetings of the American Educational Research Association since 2013 (Wilmers and Jornitz, 2021). In the next four sections, we present findings from our analysis by moving from historical developments and discourses to recent debates in public education.

History of public education within nation building processes and contemporary impacts on public education

Research has demonstrated the strong link between evolving concepts of the nation state, seen as fluid processes built on inclusive and exclusive components (on the one hand; Anderson, 2016; Langewiesche, 2000) and the evolving concept of school systems including characteristics such as standardized formats, teacher training and state control (on the other; Tröhler et al., 2011). Thus, Osterhammel (2014: 423) emphasizes the role of universal school systems as one of the characteristics of nation states in contrast to former empires. As he demonstrates, state interests in school education were manifold and varied from disciplining the population and shaping model citizens to improving military effectiveness and economic development; whereas, on the other hand, the people eventually saw schooling as a means of upward mobility and improved living conditions (Osterhammel, 2014: 796). The role of schooling and mass compulsory education for building future citizens who support the interests of the nation they live in is further emphasized by Spring (2010). By separating children from the rest of the society in order to teach them what was regarded as being of public interest, public schools became ‘incubators of the modern nation-state’ (Spring, 2010: 2).

In Germany, until the nation state was founded in 1871, public education developed in the context of emerging forms of states in the German territories. The establishment and expansion of public education thus became an indicator of the state building processes; the development of public education serves to demonstrate the shaping of institutions and organizational forms in the German territories, which were to become a nation state much later. Similarly, in the US, the earliest forms of public education were constructed in emerging states (i.e. colonies) until the nation state was founded in 1776, and education continues largely as a state right to the present day. In both countries, the development of public education did not proceed in linear or identical fashion. Instead, processes were marked by new ideas and reforms, economic developments, setbacks and crises as well as periods of political restoration (Geißler, 2011). These developments of public education, in turn, were influenced by national changes and tensions between the need for commonality in states, and later the nation state, and the rights of increasingly diverse particular groups (e.g. religion, race, gender, class, culture, language). In the German territories, owing to the Reformation, education had become more significant – particularly with respect to the aim of raising devout Christians. In the 17th century, wars and crises led to setbacks in the struggle for education, such as the outbreak of plague, famines and a dramatic population decline (Geißler, 2011).

The earliest citizens of US colonies had a largely common or universal aim to educate the younger generation as devout, upstanding or moral citizens as defined by the Puritan or Congregationalist faith, the only two religious groups in existence in the colonies at the time (Spring, 2016). With an influx of people from many different countries and an increasing number of faiths, however, there was a weakening of that concept for this common citizenry (McCluskey, 1958). In the German territories, determining steps towards an expansion of public education in particular were taken in the latter decades of the 18th century and the early 19th century in parallel to a continual extension of states, economic relationships and military forces (Zymek, 2009). In the

18th century, education was moreover linked to the idea of creating citizens who served the state by means of discipline, diligence and acquired skills. The ideas from the Enlightenment and the French Revolution added to this. Education was assigned a central role in debates on conflicting ideologies. State and Church equally recognized the importance of education regarding support for the system they intended to maintain. On the other hand, the notion of a well-educated and thus sovereign citizen became important, together with the assumption that education means or at least accelerates progress (Geißler, 2011: 83–85). The turn of the century was also crucial for the US: by 1791, 14 states had their own constitutions with 7 articulating explicit provisions with regard to public education. At the national level in the US, President Thomas Jefferson argued that education should be under the control of the government, free from religious biases and available to all people irrespective of their status in society. Others argued similarly, including Noah Webster and former President George Washington, but it was still very difficult to translate the concept of public education into practice due to political upheavals, vast immigration, and economic transformations. Thus, in the earliest decades of the US, there were many private schools and charitable and religious institutions dominating the scene (Lippmann, 1954). By the middle of the 18th century, private schooling had become the norm.

Increasing industrialization and a significant growth of population meant that education became a mass phenomenon for the first time in the 19th century on both sides of the Atlantic. In the US, the rise of educational administration contributed to new regulations. Such movements, including the use of common curriculum, teaching materials and emerging normal schools for teacher education, were also influenced by Max Weber's conception of bureaucracy. In sum, the Industrial Revolution and scientific management movements over time also contributed to the expansion of compulsory public education across the rapidly expanding nation state (Spring, 2016). In parallel, in Germany, educational administration was expanded, and regulations became more comprehensive; for instance, regarding school graduation qualifications and an improved realization of compulsory education. At the same time, teacher education was further developed, as well as teaching materials, the number of subjects and types of content taught. But contrary to the US, the fundamental existence of a distinction between education for the general public and education for an elite was to become a principle that would remain characteristic for future school systems in Germany (Geißler, 2011; Herrlitz et al., 2009).

In Germany, the growth of new branches in economy correlated to a permanent debate on the significance of different educational foci. The humanist grammar school tradition (*Gymnasium*) was increasingly critiqued by proponents of an education system that would serve the growing interests of the economic bourgeoisie, who demanded an emphasis on science subjects and modern languages such as English. This line of argument was also supported by military stakeholders, who argued for 'necessary change' in view of imperialist competition. At its core, the discussion concerning humanist versus realist orientations addressed the question of how far education should be expanded, and to which broader impulses it should be allied (Zymek, 2009: 71). Those in favor of the humanist-orientated *Gymnasium* and its privileges and regulated entitlements (shorter period of compulsory military service, higher education qualification) were afraid that an expansion would lead to their own social demise. Hence, their proponents successfully defended their privileges. Throughout the 19th century, the economic bourgeoisie succeeded in setting up an educational institution that was as accepted as the humanist *Gymnasium*. Finally, a school conference in 1900 led to the loss of monopoly for *Gymnasiums* as opposed to other school types.¹

As the 20th century progressed, most US states enacted legislation extending compulsory education laws to the age of 16. In the 19th century in the US, a related early tension emerged with regard to the desire to develop a common citizenry regardless of income or wealth (Spring, 2016). Reformers throughout the 19th and early 20th century (e.g. Dewey, 1916; Harris, 1898; Mann,

1868) wanted all children to gain the benefits of education and opposed the idea of making education available only to a particular wealthy segment of the population. Drawing on models from Prussia, Mann started the publication of the *Common School Journal* in 1838 that brought educational issues to the public. Mann and other common school reformers argued for public education based upon the belief that common schooling could create good citizens, unite society and prevent crime and poverty. The intellectual ideas from the Enlightenment and Romantic periods – as they had been developed in Germany and were popular among US education reformers – supported these aims. National and state policymakers and reformers recognized the value of education to assimilate an increasingly diverse citizenry to the values of an emerging nation state. They also sought to maintain national progress through the Industrial Revolution and developments in science. During this same time period with increasing diversity due to immigration and other societal challenges, Dewey (1916) published *Democracy and Education*, drawing heavily on the German education tradition as well as the growing influence of science within the US context. As a result of Mann's and other reformers' efforts, free public education at the elementary level was available for all American children by the end of the 19th century. Massachusetts passed the first compulsory school attendance laws in 1852, followed by New York in 1853. By 1918, all states had passed laws requiring children to attend at least elementary school. Catholic citizens were, however, opposed to common schooling and created their own private schools. Their decision was supported by the 1925 Supreme Court ruling in *Pierce v. Society of Sisters* that decided that states could not compel children to attend public schools, and that children could attend private schools instead.

In Germany, the relevance of religious influence on school education tended to decline gradually across time through the establishment of a nation state and beyond. Even after 1871, however, school education was not strictly separated from the Church. The Church retained its influence regarding religious education, which in turn meant that private denominational schools would never reach the position they held in countries such as the US where no religious education is taught at public schools (Geißler, 2011: 194). At the same time, education since the 19th century reflected the growing relevance of national culture, which had emerged in German territories starting with the late 18th century. Subject to the national discourse, education was also placed into an overarching framework and thereby a strong emphasis was placed on national ideas regarding education. Education could thus become a means of conveying the idea of a nation state, even if education systems had not been originally designed to this end.

Federalism in education was retained following the actual establishment of a German national state – the German Empire, *Deutsches Kaiserreich* – in 1871, based on state-founding processes that had occurred in previous centuries. Agreements were sought for general issues such as a mutual recognition of school graduation certificates. However, school administration and school policymaking were left to the sovereigns in the different territories (Geißler, 2011: 177). Federalism in schooling was later taken up again in the founding of the West German States after World War II and the newer East German States in 1990. Similarly, every state in the US developed a department of education and enacted laws regulating finance, the hiring of school personnel, student attendance and the curriculum. In general, however, local districts oversaw (and still oversee) the administration of schools. US public schools have also relied heavily on local property taxes to meet the vast majority of school expenses. American schools have thus tended to reflect the educational values and financial capabilities of the communities in which they are located. By the middle of the 20th century, most states took a more active regulatory role than in the past. States consolidated school districts into larger units with common procedures. In 1940 there were over 117,000 school districts in the United States, but by 1990 the number had decreased to just over 15,000. In 2018, the Census Bureau recorded just over 13,000 school districts. The states also became much

more responsible for financing education. In 1940, local property taxes financed 68% of public school expenses, while the states contributed 30%. In 1990, local districts and states each contributed 47% to public school revenues and the federal government provided the remainder. By 2018, local property taxes and states financed 45% of public school expenses with the federal government providing most of the remaining funds. Such distinctions have, over time, resulted in inequitable opportunities of education, some of which have been the subject of major lawsuits, including the Abbeville lawsuit in South Carolina (Weiler, 2007).

In the US, during the 1980s and 1990s, after the fall of the Berlin Wall and as a consequence of neoliberal policies, virtually all states gave unprecedented attention to their role in raising education standards as measured by global comparisons, such as the Programme for International Student Assessment (PISA) study. Reactions to the PISA study developed at different paces, however. Comparatively little attention was paid to the results of the first PISA study in the US, but attention rose when China ranked higher than the US in the PISA cycle of 2009 (Martens, 2010; Parcerisa et al., 2021), whereas the so-called ‘PISA shock’ hit German society after the turn of the century.

Prior to the PISA study, American society had already been profoundly alerted by the ‘Sputnik shock’ in 1957, and in 1983 a report indicated very low academic achievement in American public schools. This report, ‘A nation at risk’ (National Commission on Excellence in Education, 1983), suggested that on international academic tests, American students were outperformed by students from other industrial societies. Statistics also suggested that American test scores were declining over time. As a result, most states have taken up more responsibility and implemented reform strategies that emphasize more frequent testing conducted by states, more effective state testing and more state-mandated curriculum requirements. More recently, with the No Child Left Behind Act (2002) and later Race to the Top (US Department of Education, 2009) and Every Student Succeeds Act (US Department of Education, 2015), the federal government incentivized state and local competition for higher scores on external evaluations and identified consequences for persistently underperforming schools. These federal government’s policies, along with the most recent move toward a national common core curriculum, with its emphasis on increasing US students’ global competitiveness, have further centralized American schooling and supported a global harmonization of curriculum expectations.

In US national policy, there is evidence that international interests affected national educational organizations more than individual states. For example, in 2008, influential US groups (Council of Chief State School Officers) articulated the need for a centralized or national curriculum as a means to prepare students to be well-educated and globally competitive citizens. According to the Council of Chief State School Officers and Achieve (2008) report, the need for action included a skills-driven global economy, education for economic growth, the equity imperative, and other countries pulling ahead. Here the authors cite PISA scores whereby Finland and Singapore students vastly outperform US students. The report (Council of Chief State School Officers; Achieve, 2008) recommended five steps toward building globally competitive education system, including:

1. Upgrade state standards by adopting a common core of internationally benchmarked standards in math and language arts for grades K–12 to ensure that students are equipped with the necessary knowledge and skills to be globally competitive.
2. Leverage states’ collective influence to ensure that textbooks, digital media, curricula and assessments are aligned to internationally benchmarked standard and draw on lessons from high-performing nations and states.

3. Revise state policies for recruiting, preparing, developing and supporting teachers and school leaders to reflect the human capital practices of top-performing nations and states around the world.
4. Hold schools and systems accountable through monitoring, interventions and support to ensure consistently high performance, drawing upon international best practices.
5. Measure state-level education performance globally by examining student achievement and attainment in an international context to ensure that, over time, students are receiving the education they need to compete in the 21st-century economy.

In response to their report, all US states have incorporated some aim that students must be globally competitive in a knowledge economy (Council of Chief State School Officers and Achieve, 2008) while, at the same time, many states have pushed back on the notion of common core standards or curriculum centralization, citing federalism and states' rights to education. Nevertheless, state standards are increasingly homogenous with aims that align to a common core with slightly different language. After the turn of the century in Germany, the 'PISA shock' also led to several reforms within the education system, among which were the development of standards in education, a new awareness of the diversity of the student body and a stronger focus on quantitative education research and the necessity to collect larger data sets (see Luther, 2008; Tillmann, 2005). Yet in spite of the belief that public education should be available to every child irrespective of race, gender or economic status, this has not happened in reality. Discrimination in schools on the basis of race has always persisted in the US. For example, despite efforts during the Reconstruction era of the mid-1800s, during the 1950s, segregation by race in public and private schools was still common in the US. The south had separate schools for African Americans and Whites and this system was upheld by the Supreme Court of the United States in *Plessy v. Ferguson* (US Supreme Court, 1896). In the northern US, no such laws existed, but racial segregation was still common in schools. In 1954, the Supreme Court unanimously ruled in *Brown v. Board of Education of Topeka* (Bell, 1980) that racial segregation in public schools was unconstitutional. Despite vigorous resistance for many years by many southern states, by 1980 the federal courts had largely succeeded in eliminating the system of legalized segregation in southern states. However, even after the court rulings, it has been difficult to eliminate discrimination in practice, educational and otherwise. As this article is published, the US and many other countries are again engaged in debates and protests about systemic discrimination with regard to race. Educators worldwide are increasingly focusing education discourses on racism and anti-racism.

Discourse on education within and between the US and Germany

The discourse on education maintained by scientists and education policymakers has never been isolated to a national level. Rather, it has been seen as a European/North American concern (Osterhammel, 2014: 797) which always took international tendencies into perspective. For the US and Germany in particular, a long tradition of interchange exists in the areas of philosophy as education theory, educational administration and policy. Researchers have pointed out this special relationship between both countries (for an overview of the state of research, see Overhoff, 2017; Uljens and Ylimaki, 2017). Two lines of development are striking. These are: (a) the American interest in German education in the construction phase of their own education system, particularly regarding common schools and universities; and (b) American efforts in the process of re-education in West Germany after 1945 (Goldschmidt, 1985). Continued mutual influence occurred between these two intervals which according to Overhoff (2017) cannot merely be explained by mass immigration of Germans to the US, or the predominant role of the US after the world wars.

Rather, according to Fallon, this can also be explained by shared educational ideals, which grew from the Enlightenment (Fallon, 2001) and the Romantic period.

We can observe a long history of mutual exchanges and common roots informed by philosophers, including Kant and Hegel in Germany and Horace Mann, Torrey Harris and John Dewey in the US. Horace Mann (1868), for example, introduced American schools to the best teaching and administrative practices of the Prussian schools in his version of common schools. His reforms were designed to balance common or unifying values in the nation state with values of particular, increasingly heterogeneous religious citizens. In the later 19th century, as the US became increasingly pluralistic through immigration, Harris (1898) and other educators turned to Hegel's philosophy regarding the role of the state, forming philosophy study groups in St Louis, Missouri and Concord, Massachusetts. A dutiful follower of Hegel, Harris' philosophy of education elevated the importance of freedom and reason – and also of self-direction as it was guided by the institutions of civilization (McCluskey, 1958). Harris sided squarely with a subject-centered view of learning, believing that the wisdom of humanity resided in modern academic subjects and that, for democracy to flourish, public schools had to bring this civilizing insight to the experience of all American youth. Harris (1898), in fact, established the foundational principle of bringing the common academic curriculum to the common school, not for preparation for college but for life in a self-governing democracy, ideas that aligned to a degree with John Dewey.

Yet for Dewey, whose work was deeply informed by Hegel and Herbart among other German philosophers (English, 2013; Good, 2006), religion was an evolving social construct whose values and beliefs are relative to the culture from which they rise. Religion and morality for Dewey were to be tested by science and the scientific method (Dewey, 1916). The school is a model of society; in classrooms and in society, ethical and religious values are separate. Dewey opposed religion but defended religious values, and these he situated in the natural social process. Dewey instead placed his own faith in values verifiable in experience. Dewey (1916), conscious of the rapidly changing American context, proposed a scientific substitute for the traditional concept of religion which he thought would be more in keeping with the exigencies of modern democratic society.

On both sides of the Atlantic, education was placed in a context of developing federal systems, during the existence of different political systems: the US as a colonial system and as a republican government after 1776, and the German territories as monarchies or other aristocratic forms of government before 1871 and an empire from 1871 until 1918. Despite these differences, the German education systems, most of all the Prussian system, served as role models (Osterhammel, 2014: 796) even though the first short-lived Republic was founded in Germany as late as 1918. Owing to this situation, the transatlantic discourse pointed to different variations of a *western* association with regard to Germany (Doering-Manteuffel, 1999). According to Trommler, since the late 19th century a positive attitude shown by Americans with regard to German culture and science increasingly became affected by skepticism concerning an enforced nationalism in Germany. Hence, World War I led to a significant rise of a more negative estimation of German influence (Trommler, 2017).

Nevertheless, further transatlantic links were forged owing to political reform movements of the progressive era in the late 19th century as well as to Hannah Arendt (1951) and other German intellectuals who spent time in exile in the US during the World War II era and influenced the exchange of critical perspectives on education and pedagogy. Such critical perspectives also influenced German pedagogues, including Klaus Mollenhauer as featured in Friesen's article (this issue). After World War II, Allied forces were keen to rapidly renew the education system in West Germany and they argued for a revision of the curriculum, an exchange of teaching staff, changed school structures and the democratization of education – measures that initially were not well received by the German public (Herrlitz et al., 2009: 157–158). In the educational discourse, notably

the intensive period of reform from 1965 to 1975 led to serious reflection on and in some cases adaptation of US-American research approaches in the Western German states; for example, from psychology-based empirical studies and a managerial paradigm to curriculum theorizing and a critical theory paradigm (Terhart, 2017; Westbury et al., 2012). Today, this reciprocal process in the history of ideas is not nearly exhausted, as is evident from the current complex situation spanning the internationalization of educational issues (cf. Bellmann, 2017) as well as the recent cross-national dialogues noted earlier.

Changing notions of citizenship and identity building among federal, national and international interests

Although education is currently seen as the responsibility of the states, international organizations (e.g. OECD, UNESCO or the EU) are playing an increasingly important role in education; for example, in the context of large-scale assessment studies. International organizations are also relevant with regard to the development of supranational educational goals such as the UNESCO 2030 Agenda for Sustainable Development which attributes a key role to education (Pigozzi, 2006), or superordinate political administrative processes such as the Bologna Process, which aims at establishing uniform structures for higher education in the European university systems and increasing international mobility at universities in Europe (creation of a European Higher Education Area (EHEA)). Despite lacking legal responsibility within their member states, international actors have thus also become decision-makers in matters of education. Parreira do Amaral (2015: 374–377) accordingly identifies four instruments for the levels of action via which international governance is possible: (a) by means of setting standards; (b) by setting an agenda in accordance with defined goals; (c) by means of funding activities such as conferences and research; and (d) via coordination of activities (see also Jornitz and Wilmers, 2018; Parreira do Amaral, 2016).

For the case of Germany, Fulge, Bieber and Martens have investigated reciprocal effects that are part of the interplay of federal, national and international actors (Fulge et al., 2016). For example, national educational policy can use international mechanisms for political reforms that national stakeholders would otherwise not be able to place on the agenda, given political opposition or federal states' sovereignty in education. In this case, the international level leverages an additional space for action which is not originally forecast by a federated construction of educational policy. The international level can thus facilitate enforcement of national interests in federal states. At the same time, international actors in education are guided by their own strategic interests. Owing to their international situation and international coordination processes, they create effects at the national state level, which the national states might not have anticipated or intended (Fulge et al., 2016; see also Martens and Wolf, 2006).

How is the interplay of federal, national and international components reflected in connection with educational goals in the field of citizenship education and how does this relate to the strengthening of international values and identities as well as to the observable tendency of growing nationalism on both sides of the Atlantic? There is an overarching agreement that citizenship competencies are essential, and this exigency has been articulated at supranational, national and federal levels (Wiechmann and Becker, 2016). The fact that international recommendations are not legally binding for school policy and practice per se creates a certain flexibility to take a stand in educational matters and in the pursuit of educational goals. The declaration on 'Promoting citizenship and the common values of freedom, tolerance and non-discrimination through education' issued by the European ministers of education and the Commissioner for Education, Culture, Youth and Sport as a reaction to the terrorist attacks in France and Denmark in early 2015 serves as an example in acknowledging that 'the responsibility for education systems and their content rests with the

Member States' (Informal Meeting of European Union Education Ministers, 2015), but suggests measures to be taken up on all political levels and asks for a stronger cooperation and a more coordinated process within the EU.

The declaration urges the EU and its member states to take on 'renewed efforts to reinforce the teaching and acceptance of . . . common fundamental values', such as humanist and civic values, and to take measures to promote freedom of thought and expression, social inclusion and respect for others. It also emphasizes the need to prevent discrimination and to lay 'the foundations for more inclusive societies through education' (Informal Meeting of European Union Education Ministers, 2015). One year later, the EU published a survey on measures that the member states had taken up as a consequence of the 2015 declaration, citing examples like the introduction of national action plans that also address measures for preventing radicalization and extremism or the promotion of intercultural dialogue. Germany, for example, addressed this aim through a declaration on the presentation of cultural diversity, integration and migration in educational media signed in October 2015 by the education ministers of the states, together with organizations representing people from an immigrant background and publishers of educational media demanding a critical analysis of how diversity and multilingualism are presented in educational media. A second survey on 'Citizenship education at school in Europe' followed in 2017 (EC/EACEA/ Eurydice, 2017; see also EC/EACEA/ Eurydice, 2019), reflecting the ongoing dialogue between EU, national and state level and the EU interest in monitoring this process.

If we look at the national scale in Germany, due to the fact that education is a state affair, legally binding documents, such as documents issued by the Standing Conference of the Ministers of Education and Cultural Affairs of the Länder (states) in the Federal Republic of Germany, or the German reunification treaty in 1990, tend to concentrate on administrative matters or interstate school relations (Einigungsvertrag, 1990; Sekretariat der Ständigen Konferenz der Kultusminister der Länder in der Bundesrepublik Deutschland (Standing Conference of the Ministers of Education) (KMK), 2001). However, in 1973, the KMK issued a decision on the position of students at school which reflected a reaction to political unrest in the years before. This document outlines the rights and duties of students at school; for example, the use of appropriate forms of voicing one's opinion, compulsory school attendance and forms of school strikes (KMK, 1973). In the first paragraph, the document also lists high-level educational objectives targeting a democratic, pluralist, value-oriented and peaceful society. Federal state school laws contain similar passages to this day (Wiechmann and Becker, 2016: 300).

In its role as a superordinate organization in educational policy, the KMK yet refrains from further defining reference points students can identify with on a local, national or international level; however, such references can be found in different school laws of the states which regulate all school matters. In the paragraph titled 'Educational remit of schools',² the school acts define cross-curricular objectives, generally following the German Constitution (*Grundgesetz*) and in compliance with the local state constitution and their perception of the right to education. The following list of cross-curricular objectives refers to objectives targeting the setup and cohesion of society as a whole, education for a peaceful, democratic, inclusive and sustainable society with equal rights and emphasis of individual developmental goals. These goals pertain, for example, to the ability to deal constructively with conflicts, the ability to pursue vocational education or to deal with media and information. In one form or the other, the goal of peace education is listed in all the 16 school education acts; in some cases it is emphasized by reference to the aim that students should learn to resist national socialism and other forms of totalitarian and authoritarian regimes (e.g. school act Brandenburg, §4; school act Saxony, §1) (see Appendix I for this and all following school acts). Superordinate objectives are occasionally also mentioned in subsequent passages; for example, in the context of comprehensive learner tasks, learning plans or a more precise definition

of religious and ethics instruction (e.g. school act Berlin, § 12). In the school laws, cross-curricular educational goals are not only seen as theoretical goals, but also as something that should be realized within the school community.

If school legislation, in the context of outlining concepts of responsible actions, corresponds to a particular worldview, it is one committed to ideas of democracy and freedom, but sometimes also to humanistic and even Christian points of view – and, in the case of Berlin, to ancient history (school act Berlin, § 1). This reflects trends in a broader European context. Citizenship education is claimed by school laws in all the states. Seven states (Bavaria, Berlin, Brandenburg, Hesse, Lower Saxony, Thuringia, Schleswig-Holstein) also focus on the students' future role in Europe, albeit in different ways. This ranges from a rather vague concept of Europe which mentions the shared future of countries in Europe (e.g. Lower Saxony), to an explicit reference to the EU (Hesse) through to the importance of taking on tasks within the EU (Brandenburg). The fact that most states in Germany do not explicitly point to the European role of its students in the school laws corresponds to a study analyzing the degrees to which European member states support an international identity building in schools. In this study the authors see 'little evidence that the international dimension is addressed to its fullest, including the creation of a sense of cosmopolitanism and European and global citizenship (Veugelers et al., 2017: 58). Nevertheless, the lack of a European identity component in several German school laws does not mean automatically that European community building is not transferred via schools in these states.

In Germany, the expansion of political levels of concern from a regional to an international level is particularly evident in Thuringia, which like some other states goes even beyond the idea of Europe: 'school cultivates our connection with our home in Thuringia and in Germany, supports openness regarding Europe, and awakens the awareness of our responsibility for all people in the world'.³ The opposite case is evident in the school law for Saxony-Anhalt, which particularly underscores the importance of one's own home region in Europe as an educational objective. In this regard, the school law states that the school has a duty to 'educate students toward tolerance with respect to cultural diversity and international understanding, and to enable students to recognize the value of their home state in unified Germany and within a common Europe'.⁴ The reference to home and the promotion of a love of the students' own state is stated in seven school laws (Baden-Wuerttemberg, Bavaria, North-Rhine Westphalia, Saxony, Saxony-Anhalt, Schleswig-Holstein and Thuringia). Two other school acts implicitly refer to this idea by cultural regional reference (Brandenburg, Mecklenburg-Western Pomerania). In this context, the protection of regional languages and ethnic groups comes into play, such as Friesian or Sorbian (e.g. in Schleswig-Holstein and Saxony). By referring to a European and even further international context on the one hand and to regional identities on the other, the school laws underline an understanding of a politically, historically and culturally defined identity that includes but also goes beyond the nation state. The fact that school laws do not further determine their definitions of 'home' or Europe in the general paragraphs outlining their remit may have certainly helped to create a consensus among different parties involved within the states, but also opens space for interpretation.

For the case of the US, we can observe an increasing but also varying level of interplay among international or transnational organizations, national policies and state policies with regard to global citizenship development. For instance, the national US 'Education for All' (2000) incorporated UNESCO's position on global citizenship and its education targets have influenced state policies. More specifically, the UNESCO global citizenship project explains that social justice, diversity, gender equality and environmental sustainability are needed to empower learners to be reasonable global citizens, values that differ from the traditional state-based policies that deal with citizenship education and other education standards. And while there is an overarching agreement

that global citizenship and national citizenship competencies are important, that importance is weighted against the growing nationalist perspective on citizenship as well as varying state values regarding what it means to be a citizen within state lines (e.g. Massachusetts, New York, Virginia).

Like Germany, the US federal government expects states to implement international standards, but states have authority to decide how to meet these expectations. All 50 US states include civics or citizenship education as part of curriculum standards; however, the emphasis on ‘global citizenship’ differs. For example, California’s curriculum standards include a strong emphasis on global citizenship, diversity and responsibility with professional support for teachers on topics such as Black Lives Matter, teaching for sustainable communities, Latino/a leadership, and teaching to support indigenous language and culture. New York state standards also include civics and global citizenship education with standards or benchmarks that feature respect for the rights of others in discussion and classroom debates, consideration of alternate views in discussions, and fulfillment of social and political responsibilities associated with citizenship in a democratic society that is interdependent with a global community. The Massachusetts State Department guidelines are similar but have more explicit language about global citizenship education with aims of global awareness, development of an idealized global citizen, and universal rights and responsibilities to a world community (e.g. Massachusetts Department of Elementary and Secondary Education, 2021). In a third example, by contrast, Virginia state policies have only one brief mention of global citizenship, with more emphasis on character education and civic virtues ‘aligned with Virginia and the United States Government’ (e.g. Virginia Department of Education, 2021).

As an ‘idealized global citizen’ understands how the world works, he or she upholds a universal set of rights, enacts responsibilities that contribute to the world community (even on a local scale) and is outraged by social injustices within a worldwide democratic public sphere (Koyama, 2015). At the national level in the US, citizenship and citizenship education are two of the oldest ideas in political theory, and scholars are showing new interest in both. Through every era of recorded history, ideals of citizenship have been articulated and contested. Jefferson’s view, summarized in his plea for public education, is a distillation of centuries of ‘western’ writing on the subject – beginning with the Greeks (especially Plato and Aristotle) and including the Enlightenment which constructed reason, rights and individuals (Locke, Rousseau). The notion of the global citizen has roots in Immanuel Kant’s Cosmopolitan Law that has informed both German and US laws as well as international interests in organizations like the League of Nations (Kleingeld, 2011). As Kleingeld (2011) reminds us, some essential parts of what Kant saw as necessary for a global legal order are usually neglected, including his emphasis on the status of individuals under what he calls ‘cosmopolitan law’. Here cosmopolitan law is concerned not with the interaction between states, but with the status of *individuals* in their dealings with states of which they are *not* citizens. Moreover, cosmopolitan law is concerned with the status of individuals as human beings, rather than as citizens of states.

In sum, values for globally competitive education and citizenship development are reflected in US educational documents, including most recently the Every Student Succeeds Act (McGuinn, 2016). There is variation among state policies with regards to citizenship education with the most common components including a discussion of current events and news media literacy. Most states require two or three types of courses related to these topics for high school graduation. Every state mentions discussion of current events in its standards or curriculum frameworks, and 39 states and Washington, DC mention news media literacy. Notably, the components most frequently found in state standards tend to involve classroom instruction, knowledge building, and discussion-based activities. Fewer states have incorporated participatory elements of learning or community engagement into their standards or curriculum frameworks. Just over half of the states mention simulations of democratic processes or procedures while 11 states include service learning. This

unevenness is a concern given the sentiment among civics education experts that high-quality education is incomplete without teaching students what participation in civic life looks like in practice (Baumann and Brennan, 2017).

Concepts and ideas of public education and citizenship education: conclusions on state, national and transnational discourses over time

In this article, we have considered historical and contemporary perspectives on relations among education, nation building processes, and aspects of citizenship education and identity building. In so doing, we used comparative methods to examine the literature and documents regarding how different ideas and concepts of public education have framed key concepts over time in the US and Germany: namely – nation building, education, cosmopolitanism versus the state, changing demographics and population migrations that are internal to nation states or region states like the EU. We asked:

1. What similarities and differences can we find when comparing the historical situation and aspects of the contemporary development?
2. What kinds of transnational discourses and influences can we retrace historically?

Research has documented similar relations between the evolving concept of the nation state in the two federalist systems of Germany and the US with fluid processes built upon inclusive and exclusive concepts (Anderson, 2016) as well as the evolving concept of the school systems (Tröhler et al., 2011). We can observe similarities in state interests in school education to build citizens, to improve various aspects of societal effectiveness and economic development, and to support upward mobility and improved living conditions (Osterhammel, 2014: 796). By separating children from the rest of the society in order to teach them what was regarded as being of public interest, public schools became ‘incubators of the modern nation-state’ (Spring, 2010: 2). In certain ways, the US patterned the notion of its compulsory and common school system after Germany. John Dewey, Horace Mann and others were heavily influenced by notions of *Bildung* and education from German scholars Hegel and Herbart among others. At the same time, there are important contrasts in the US system of evolving educator training over time; we can observe a very diverse set of educational perspectives underpinning the US system, including a growing influence of critical perspectives and culturally sensitive pedagogy, on the one hand, and instrumental, accountability or evidence-based discourses on the other hand.

Both the US and Germany have experienced discourses of cosmopolitanism versus the state, emerging from neoliberal policies, including privatization and open market competition as well as changing demographics due to population migrations. We can observe a growing interplay among federal, national and international components of key US and German education policies with regard to citizenship education and how it relates to the strengthening of international values and identities as well as to the observable tendency of growing nationalism on both sides of the Atlantic. There is a similar perspective that citizenship education is important at all levels as well as an opportunity for flexible application in various states, districts and schools. As Koyama and Gogolin argue in their articles (this issue), in the contemporary situation, such flexibility is critical for increasingly culturally and linguistically diverse students from various nation states living within the US and Germany.

Such tensions between neoliberal policies and student diversity are not new. Moreover, the dialogue about public and private education has a long historical root. Historically, we can trace

these transnational discourses and debates about cosmopolitanism, citizenship and nation building, private interests versus the public good and the role of education in these, yet the challenges are new in some ways, shaped by neo-nationalism and the rise of cosmopolitanism within nation states due to population migrations (Uljens and Ylimaki, 2017) as well as to new inequities in education as they became apparent; for example, amidst the COVID-19 pandemic and questions of access to education. As the Friesen article on Mollenhauer in this issue points out, we see a need to go back to the history of education theory in order to go forward and ground contemporary discussions about public education in forgotten connections of *Bildung*, education, and the role of these in what it means to be human. Thus, we conclude with an invitation to continue the cross-national dialogue initiated at the US-German panel this issue is based on and related venues in order to support mutual understandings of new and perennial topics bringing public education to a new crossroads.

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Notes

1. See Herrlitz et al. (2009: 63–81). Schooling of girls developed at a different pace in the 18th and 19th centuries, with Germany being very reluctant in opening higher education to female students. The fact that many educational careers were systematically not available to girls until the 20th century in Germany led to the foundation and further development of girl schools. For a history of girl education, see Koerrenz et al. (1996), Berg (1991), Jeismann and Lundgren (1987) and Hammerstein and Herrmann (2005).
2. 'Bildungs- und Erziehungsauftrag der Schule'.
3. 'Sie (die Schule) pflegt die Verbundenheit mit der Heimat in Thüringen und in Deutschland, fördert die Offenheit gegenüber Europa und weckt das Verantwortungsbewusstsein für alle Menschen in der Welt.' School act Thuringia, §2.
4. '(D)ie Schülerinnen und Schüler zu Toleranz gegenüber kultureller Vielfalt und zur Völkerverständigung zu erziehen sowie zu befähigen die Bedeutung der Heimat in einem geeinten Deutschland und einem gemeinsamen Europa zu erkennen.' School act Saxony-Anhalt, §1.

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Appendix I

School Acts from the German states

- Baden-Wuerttemberg: Schulgesetz für Baden-Württemberg (SchulG). Available at: <http://www.landesrecht-bw.de/jportal/?quelle=jlink&query=SchulG+BW&psml=bsbawueprod.psml&max=true&aiz=true> (accessed 25 August 2020).
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- Hamburg: Hamburgisches Schulgesetz (HmbSG). Available at: <https://www.hamburg.de/bsb/schulgesetz/64412/start/> (accessed 25 August 2020).
- Hesse: Hessisches Schulgesetz (Schulgesetz HSchG). Available at: https://www.rv.hessenrecht.hessen.de/lexsoft/default/hessenrecht_rv.html?p1=0&eventSubmit_doNavigate=searchInSubtreeTOC&showdoccase=1&doc.hl=0&doc.id=jlr-SchulGHE2005rahmen&doc.part=R&toc.poskey=#docid:169561,1,20180525 (accessed 25 August 2020).
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- Saxony: Sächsisches Schulgesetz. Available at: <https://www.revosax.sachsen.de/vorschrift/4192-Saechsisches-Schulgesetz> (accessed 25 August 2020).
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Appendix II

Sample state policies related to the Every Student Succeeds Act (ESSA)

- Arizona: Arizona Department of Education, Instruction, and Assessment. Available at: <https://www.azed.gov> (accessed 26 August 2020).
- California: California Department of Education: Stronger Together. Available at: <https://www.cde.ca.gov> (accessed 26 August 2020).
- Georgia: Georgia Department of Education, Instruction, and Data. Available at: <https://www.gadoe.org/Pages/Home.aspx> (accessed 26 August 2020).
- Ohio School Improvement, Curriculum and Assessment Policies. Available at <http://education.ohio.gov/school-improvement> (accessed 26 August 2020).
- Rhode Island: School Improvement, Instruction and Accountability. Available at: <https://www.ride.ri.gov> (accessed 26 August 2020).
- Texas: Texas Education Agency. Available at: <https://tea.texas.gov> (accessed 26 August 2020).
- Wyoming: Wyoming Department of Education, School Improvement, Curriculum, and Assessment. Available at: <https://edu.wyoming.gov> (accessed 26 August 2020).

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