

POLICY INFLUENCES

TOOLS FOR ASSESSING ADMINISTRATIVE HOLDS



FROM THE *NO HOLDING BACK* PROJECT

This guide presents examples that the 12 public institutions in the *No Holding Back* project identified of the types of federal, state, governing system, and other policy and external influences that frame their usage of holds. These examples can provide useful insights for other institutions considering an assessment of their own holds policies and practices.

Some holds are codified in legislation, regulation, or documented policy at a federal or state level. And holds may be influenced by other overarching initiatives such as statewide or higher education system completion, or transfer campaigns:

Federal Legislation and Regulations



Department of Education



Department of Defense



Immigration and Customs Enforcement

- Financial aid administration
- Military benefits
- Title IX training
- Immigration regulations

State



Legislation and Regulations



Strategic Initiatives

- Debt collection
- Transcript restrictions
- State authorization for online providers
- Attainment goals
- Completion campaigns

Higher Education Agency or System



Codified Policies



Strategic Initiatives

- Immunization documentation
- Students with balance
- Advising requirements
- Student access and success
- Credit transfer
- Articulation

Cross-State Agreements and Other Factors






- Cross-state articulation and tuition agreements
- Distance education
- Out of state students
- Accrediting standards for student success



At an institutional level, policies referring to registration or transcripts are often reflected in the academic and administrative regulations and procedures. These policies are publicized for students and are often replications or duplications of higher-level federal, state, or system source policies:

Institutions

 Codified Policies	 Documentation and Governance	 Uncodified Use of Holds	<ul style="list-style-type: none">• Advising requirements• Conduct violations• Athlete requirements• Return of property or equipment• Student success and support• Payment plans• Admissions paperwork• Auxiliary units (housing, parking, bookstore)
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The examples offered by institutions in the *No Holding Back* project suggested that holds usage and implementation may be less likely to be codified and often relies instead on institutions' best interpretations and discretionary decisions for implementation of the source policy.

Starting Ideas



An assessment of administrative holds usage must include both a systematic inventory of and an understanding about the policies, regulations, administrative requirements, and institutional guidance governing holds. From this, institutions may also discover where there is discretion in the use of holds, and where there is possibility for improvement.

There is wide variation in what external policies and factors influence an institution's usage of holds. Users of this guide can consult existing [policy research](#), as it does not identify every possibly relevant policy or provide legal interpretation of policies or regulations. But, the following examples articulated by the 12 public institutions in the *No Holding Back* project may inform a methodical inventory of holds-influencing policies and factors.

- ▶ Consult internal departments with policy and regulatory expertise.
- ▶ Consult documentation and analysis about holds to be aware of all holds.
- ▶ Determine whether the hold and the way it is administered at the institution is prescribed by documented or codified policy from a legislative or governing body or agency.

Holds that are specifically prescribed by a documented or codified policy may present less opportunity for adjustment. However, there may be potential for adjusting holds for which the associated policies do not detail the mechanics of how to fulfill or enforce requirements (e.g., satisfactory academic progress) and for holds that an institution finds to not to be based on documented or codified policy.

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“ There may be regulated holds, but those that are non-regulated provide more discretion for possible alternatives and approaches to get students to do something that is needed.

FLATHEAD COMMUNITY COLLEGE





For all holds:

- ▶ Confirm that any related policy is being interpreted and implemented accurately.
- ▶ Ask when policies were last reviewed. Consider the institution's interpretation of a related policy, decisions about how to implement it, and implementation mechanisms (communications, automated and computerized processes, options for resolving, appeals). Confirm that the interpretation and implementation is current and reflects any recent changes or developments.
- ▶ Review usage and resolution patterns and other trends from data (see the [Data and Evidence guide](#)).
- ▶ Adjust the implementation of the hold, as relevant, and institute periodic review.
- ▶ Determine whether policy mandates the specific use and deployment of a hold, or whether there is flexibility for other preventative mechanisms to avoid the imposition of a hold.
- ▶ Focus on improving communications about holds. Develop methods that provide more student-centered, responsive and transparent communications strategies (see Student Perspectives Tool).
- ▶ Develop governance guidelines for holds usage and systematize procedures, practices, and documentation, as appropriate.
- ▶ Implement ongoing monitoring and review of holds usage and impacts.

Federal Legislation, Regulations, and Proposed Regulations



Some holds may be codified by or derived from state legislation or regulation. For example, institutions may place holds on registration or transcripts to administer, manage, and comply with requirements such as these:

- ▶ Requirements for satisfactory academic progress, such as those related to federal financial aid, military tuition assistance, scholarships, and grants (see also considerations about aid timing in the [student videos](#)).
- ▶ Requisites for financial aid application, eligibility, and renewal requirements, such as for the Free Application for Federal Student Aid (FAFSA®).
- ▶ [Updates](#) or [proposed changes](#) to federal financial aid legislation, like recent regulations prescribing the [return of Title IV funds in the case of withdrawal](#) (R2T4).

💡 Regulatory or policy changes may present opportunities to not only adjust to meet new requirements, but also to re-evaluate or improve the administration of these policies, including the consideration of alternatives to holds..

“ The university is engaging specific units/departments, administration, and faculty leadership to review university policy regarding enrollment holds through their robust shared governance structure. [We] began ongoing reviews to assess if restricting enrollment really improves students' outcomes, with an emphasis on equity and including [factors like] student retention by holds experience, the relevance and mechanics of the holds, and whether holds are removed when no longer applicable. And [we are] critically reviewing all advising-related service indicators and enrollment restrictions, any new requests for restricting enrollment, and specific outcomes for all advising service indicators.

CENTRAL WASHINGTON UNIVERSITY



“ Satisfactory academic progress (SAP) could relate to a hold on the disbursement of aid or potentially inform a future financial hold if students cannot get their funding. But it does not necessarily require a registration hold or a hold on accessing transcripts.

PORTLAND STATE UNIVERSITY



“ [This university] has hold types to address immigration requirements for international students, and exit interview requirements for federal loans.

UNIVERSITY OF NEVADA, LAS VEGAS



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State Legislation and Regulations



Policies for the administration of state or institutional aid can also reflect or satisfy similar federal requirements. Other examples where institutions may use holds to reflect state legislation or regulations include:

- ▶ *No Holding Back* project participants located in California, Colorado, Oregon, and Washington were subject to existing and forthcoming state restrictions on transcript holds during this project. Specific restrictions vary, but they typically limit, restrict or define institutions' use of transcript holds as part of debt collections. These policies include:
 - California Assembly Bill No. 1313 Educational Debt Collection Practices Act.
 - Colorado House Bill 22-1049 Prohibiting Transcript And Diploma Withholding.
 - Oregon Senate Bill 424 Relating to transcript holds at post-secondary institutions of education.
 - Revised Code of Washington 28B.10.293 Collection of debts— Conditions and limitations on institutions of higher education.
- 💡 The ways in which institutions respond to recent state-level regulation of administrative holds can provide helpful insights for institutions who are interested in voluntarily limiting their own use of holds.
- ▶ Debt collection regulations are closely associated with the use of transcript holds, and they may be codified by other state or educational system regulations.
- ▶ Policy makers and institutions may need to attend to more than one policy as related policies are revised, to prevent unintended consequences, and to optimize the potential for improvement.
- ▶ [Immunization](#) and [communicable disease](#) policies may also govern the use of holds in certain jurisdictions.

State Higher Education Agency or System of Higher Education



Institutions may be subject to regulations and policies from state higher education agencies or systems of higher education. These policies may originate from state legislation or from higher education governance bodies.

- ▶ Institutions should confirm whether registration or transcript holds are specifically defined, mandated, and authorized with discretion, or if they are even referenced in higher level policies.

“ For public institutions, system-wide conversations are highly recommended, including discussing strategies and solutions with colleagues from other institutions in the state system, who are familiar with the state's context and policies. ”

UNIVERSITY OF NEVADA, LAS VEGAS

“ In our state, each college may determine if they shall or shall not withhold registration, transcripts, and diplomas for debt recovery. Our college follows the current procedures for all Montana University System's institutions of not releasing official transcripts for unmet financial obligations. ”

FLATHEAD VALLEY COMMUNITY COLLEGE

“ During the course of this project, the public universities in our state began a parallel project looking at transcript holds. Having the data and framework from our institutional work extended our ability statewide to rethink our use of administrative holds and potentially develop new standards and debt-forgiveness opportunities. ”

UNIVERSITY OF ARIZONA

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- ▶ Policies related to students with an overdue debt can vary in whether they mandate, authorize with discretion, or prescribe the use of holds on registration or transcripts.
- ▶ Examples referenced by institutions in the *No Holding Back* project include [Montana](#) Board of Regent Policy 940.21 and [Nevada](#) System of Higher Education Board of Regents Title 4, Chapter 17, Section 2, “Delinquent Accounts” (relatedly, Nevada Assembly Bill 212).
- ▶ Within a system, holds could impact student enrollment across institutions, including transfer between institutions, and co-enrolled students.

Cross-state and Other Factors



Policy makers and planners may wish to evaluate whether holds are associated with other overarching initiatives or alliances, including:

- ▶ [Strategic priorities](#) around student success, enrollment, and loan forgiveness initiatives.
- ▶ Institutions in the *No Holding Back* project did not specifically find any holds derived from accreditation-related policies, but several institutions referred to [accreditation standards](#), like those set forth by the Northwest Commission on Colleges and University (NWCCU), which address mobility of transfer credit, student success and the closure of equity gaps. Such standards may support the limited use of transcript holds and allowing for temporary removal of transcript holds for students wishing to transfer.
- ▶ Other overarching factors, initiatives or alliances may be associated with holds, including institutional guidance around distance education, out-of-state enrollments, and cross-state tuition reciprocity and discount options.

Institutional Policies and Regulations



By and large, the institutions in this project did not cite institutional policies as examples of codified or documented policies that influence their use of holds. The ‘institutional policies’ described by project participants often appeared to be the institutions’ duplicate representation of higher-level regulations, presented in the form of academic and administrative regulations and procedures. These policies were typically publicized in the college catalog, student handbook, or other materials.

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“ Nevada State Higher Education institutions must release a transcript of academic record, a diploma, a certificate, or report of semester grades, to a current or former student having a delinquent account, providing they enter into an institution approved payment plan. It was subsequently clarified that a payment shall not be required for the release of a transcript.

GREAT BASIN COLLEGE



“ Modifying the requirements that apply to the three University of Alaska institutions for accounts receivable (A/R) and financial aid, including that [an] A/R balance of \$200 or more prevents students from obtaining transcripts, registering, or accessing grades online, would require a conversation with all three institutions.

UNIVERSITY OF ALASKA SOUTHEAST



“ Based on our experience, institutions should prepare themselves for possibly unwelcome or unexpected findings. More often than not, student holds reflect long-standing and unwritten practices adopted by departments and administrative units with very little oversight, rather than existing in written policy.

UNIVERSITY OF NEVADA, LAS VEGAS



POLICY INFLUENCES



FROM THE NO HOLDING BACK PROJECT

When assessing institutional policies, it is important to keep the following in mind:

- ▶ Consider whether a single institutional policy document serves more than one purpose, for example, as the governance declaration, codification of rules or procedures, and consumer information. Is the policy document conducive to communication and comprehension by all affected parties? Does it explicitly explain in lay terms the conditions that culminate in an administrative hold, and consequences of reaching this point? (See also [Student Perspectives](#))
- ▶ Thorough systems and documentation of holds might feature:
 - Source policy documentation
 - A student-centered presentation of source policies and communications
 - Automated business logic
 - Standard procedures for staff use of holds, stipulating timelines, resolution parameters, and holds governance

Examples:

- ▶ Central Washington University: [Academic and General Regulations](#)
- ▶ Portland State University: [Registration Holds](#), [Financial Holds Policy](#), [First Year Advising](#), and [Academic Warning Holds](#).
- ▶ Laramie County Community College: [Student Records Restrictions](#), and Academic Probation and Suspension.
- ▶ University of Arizona: [Past Due Balance](#), [Back2UA](#) for returning students, [Immunization](#), Academic Eligibility; [Disciplinary Holds](#), and [Library](#) policies
- ▶ Idaho State University: [Transcripts](#), [College Regulations](#), and [Academic Procedures and Requirements](#)
- ▶ Idaho State University: [Communicable Disease Policy](#), [Credit, Collections, and Bad Debts](#)
- ▶ University of Nevada, Las Vegas: [Policies](#), and [Business Affairs Policies and Procedures](#)

Note: Information has been anonymized unless express permission to attribute was granted.

“ There is no central governance on who can set and apply holds, but ultimately the registrar approves and implements it.

PORTLAND STATE UNIVERSITY



“ One initial change to policy and practice was that housing shifted from enforcing housing contracts for first-year students by restricting enrollment to using a service indicator flag on the account that doesn't prevent enrollment.

CENTRAL WASHINGTON UNIVERSITY



Do you know of another resource, have a question or want to recommend something?

Share with us here:

www.wiche.edu/

[administrative-holds/share](#)