TOOLS FOR ASSESSING ADMINISTRATIVE HOLDS

FROM THE *NO HOLDING BACK* PROJECT

ABOUT

TOOLS FOR ASSESSING ADMINISTRATIVE HOLDS

The *No Holding Back* project emerged amidst increased public and legislative scrutiny of the use of holds on student accounts in postsecondary educational institutions. In response to interest from chief academic officers at public universities and colleges in the U.S. West to better understand the use of holds, including how they impact student success, WICHE and the American Association of Collegiate Registrars and Admissions Officers (AACRAO) received support from Ascendium Education Group and Lumina Foundation to lead a collaborative learning community.

Twelve public postsecondary institutions worked both individually and collaboratively over the course of a year (from August 2022 to August 2023) to build upon existing research about holds usage and to analyze administrative hold data at their institutions.

1. California State University – Fullerton
2. Central Washington University
3. Eastern Oregon University
4. Flathead Valley Community College (MT) *2-year school*
5. Great Basin College (NV) *2-year school*
6. Idaho State University
7. Laramie County Community College (WY) *2-year school*
8. Portland State University (OR)
9. University of Alaska Southeast
10. University of Arizona
11. University of Guam
12. University of Nevada – Las Vegas
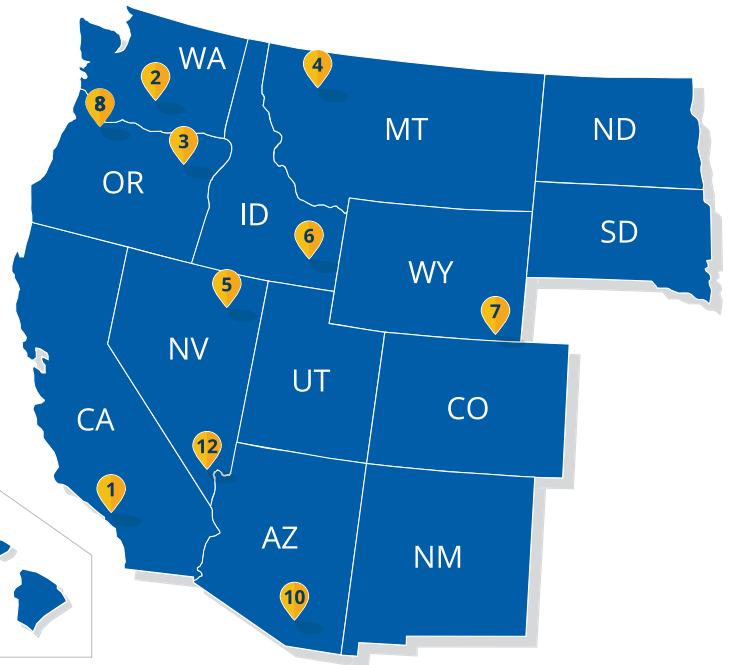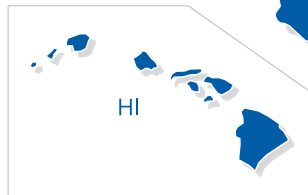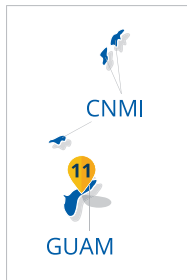
▶ 7 institutions with 30%+ Pell recipients

▶ 5 minority serving institutions

▶ Ranging in size from 1,500-40,000 degree-seeking undergraduates per year

▶ Rural and urban locations

▶ Banner, Peoplesoft, Colleague, CAMS Enterprise student information systems

ABOUT

Because administrative holds can be wide-ranging and their use commonplace, these institutions convened cross-functional teams of administrative leaders, registrars, bursars, enrollment specialists, and directors of information technology and institutional research to set their framework, analyze their policies and data, and move forward on their goals to optimize the use of holds on their campus.

Throughout the year-long project, these 12 institutions shared information through:

▶ An application to the project

▶ Participation in a kickoff retreat and pre-assessment

▶ Pilot testing of a data collection and analysis protocol

▶ Participation in virtual meetings highlighting progress and institutional findings

▶ Structured team debriefings

▶ Written final summaries and a post-assessment about policy environments and changes underway

▶ Making students available to provide their perspective in focus groups

The collective approaches, learnings, strategies, and solutions that the institutions developed over the course of the year culminated in tools and learning resources that present potential starting points for other institutions to assess their own usage of administrative holds. These tools include:

▶ Downloadable templates for compiling and performing basic quantitative analysis

▶ Planning guides

▶ Testimony, profiles, and examples from institutions

▶ Student experiences with holds

The situations and findings represented by these resources demonstrate a variety of contexts familiar to many public two- and four-year colleges across the country, and in many cases, reiterate what other research has found. These resources refer to a robust amount of qualitative and quantitative information surfaced in this year-long participatory research project. However, these do not exhaustively address all possible settings and more research and replication is needed to identify what activities could be characterized as "best practices".

WICHE invites feedback and contributions to this body of knowledge!

Share with us here: www.wiche.edu/ administrative-holds/share

WICHE
Western Interstate Commission for Higher Education

PLAN A HOLDS ASSESSMENT

TOOLS FOR ASSESSING ADMINISTRATIVE HOLDS

The experiences of the 12 public postsecondary institutions in the No Holding Back project were the basis for a guide to planning a basic institutional holds assessment that can be used flexibly and tailored to various institutional settings.

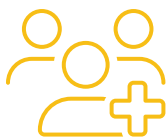|				
Convene a Cross-Functional Team	**Identify Reasons, Resources, and Challenges**	**Assess Holds Through Data**	**Review Policies, Procedures, and Processes**	**Consult Students**

Convene a Cross-Functional Team

Holds may be used in different ways by the operational units within an institution. To fully understand the origins and justification of specific holds, and to encourage buy-in for potential changes to holds policies, representatives of these units should be consulted and involved in a holds assessment.

▶ The units to involve in the assessment might include:

- The registrar
- Institutional research
- Finance/student accounts
- IT
- Student affairs leadership
- Administrative champions or leadership

▶ Consider the role of faculty and faculty leadership in originating, using, communicating about, and improving the use of holds.

(continued)

> We strongly recommend taking an 'interdisciplinary' approach to reviewing policies and practices on holds, including representation from a number of units who have a stake in student progression and completion.
>
> UNIVERSITY OF NEVADA, LAS VEGAS

> Talking with other departments is key. Break down unintended silos by auditing existing holds and the hold communication process.
>
> FLATHEAD VALLEY COMMUNITY COLLEGE

▶ Including and leveraging other institutions in a holds assessment can also strengthen your analysis. For example:

- Institutions with high rates of transfer or co-enrollment with your institution.
- System-level or other governing bodies or agencies (see also Policy Influences).
- Other institutions that you collaborate with for inspiration, practical ideas and examples, and help to stay on track.

Identify Reasons, Resources, and Challenges

Working collaboratively, a cross-functional team can identify what information is important and compelling for the institutions' unique priorities.

▶ **A cross-functional team can acknowledge the various perspectives and capital that coalesce around institutional financial health and student success.** For example:

- **Campus leadership** may wish to proactively respond to external pressures or demonstrate the institution's commitment to support students by limiting the use of holds, while also maintaining institutional viability.
- **Financial units** can share expertise concerning tuition revenue, financial obligations, documentation, payment deadlines and options, past due account balances, and debt collection regulations.
- **Records and admission units** can bring the perspective of admissions requirements, legally mandated forms and documentation, and requirements for credit evaluation and credit portability.
- **Enrollment units** contribute knowledge around student enrollment targets, the roles of various types of students in enrollment levels (such as new students, transfer students, returning and re-enrolling students).
- **Student affairs units** can provide insights on the academic and personal needs of students, as well as perspectives on student equity, progress and success.

▶ **The intentional and thoughtful involvement of stakeholders may reveal unintended and downstream effects of holds.**

▶ **As priorities for a holds assessment are identified, acknowledge what resources will be needed, and what will be available, for the data analysis component.** These dimensions are also important to consider when it comes time to implement any changes that may arise from the holds assessment.

(continued)

> A community of practice provided the opportunity to learn best practices from participating institutions and industry professionals committed to supporting students from low-income backgrounds, students who are first in their family to attend college, or students of color in their educational retention and success.
>
> UNIVERSITY OF GUAM

> Financial holds are coordinated to allow student flexibility for continuing registration that does not require prepayment or have cancellation. The threshold is relatively high for a registration hold. They are meant to signal the student that changes need to occur to prevent too much indebtedness.
>
> UNIVERSITY OF ARIZONA

> You will reveal both positive and negative evidence and patterns. We found that tuition remissions programs are supporting Pell students as intended. And that new students, Black students, indigenous students, and first-generation students are experiencing greater negative impacts.
>
> PORTLAND STATE UNIVERSITY

▶ **Consider possible challenges, which may include:**

- Lack of standardized, computerized, or documented data about holds.
- Lack of capacity to compile and analyze holds data.

  💡 The available Technical Guide for Assessing Administrative Holds with Data, accompanying workbook, and examples and perspectives from other institutions in the Data and Evidence guide, may help mitigate capacity issues.

- Varying audiences and expectations for what type of data are compelling for change.
- Reluctance to change institutional practices that are perceived as supportive of institutional viability.

  💡 Emphasize that you will first be looking for evidence that there is a need for any change. Invite concerned stakeholders to participate in the assessment and represent their perspective.

- Concern that altering the use of holds could impact student compliance with administrative requirements, advising, and other activities.

  💡 In your initial data analysis, evaluate the effectiveness of existing holds in achieving compliance, so you will work from evidence rather than impressions about the usefulness of holds. This provides a benchmark "compliance indicator" as you experiment with alternatives.

Assess Holds Through Data

Compiling and analyzing the available data about holds from your student information system and other information management systems is a foundational part of a holds assessment.

💡 The available Technical Guide for Assessing Administrative Holds with Data, accompanying workbook, and examples from other institutions in the Data and Evidence guide, provide a basic replicable framework for quantitative analysis of holds.

Review Policies, Procedures, and Processes

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

(continued)

> " Holds can prevent students from receiving scholarships. For example, a library fine that prevents students from registering may limit students from meeting scholarship requirements or from obtaining transcripts or grades needed for specific scholarships or applications.
>
> UNIVERSITY OF ALASKA SOUTHEAST "

> " One anticipated challenge with changes was departmental buy-in. To mitigate this challenge, we provided departments with the relevant hold information so they have the data they need in order to participate in inventorying holds, and to know that we are attempting to make positive changes to the student experience by evaluating hold usage.
>
> UNIVERSITY OF ARIZONA "

> " Be willing to critique and focus on continuous improvement. This work is not easy; too often language like "because we have always done it this way" will come up and you need to think past that to "Why do we do this".
>
> EASTERN OREGON UNIVERSITY "

> " Data retention, storage and integrity is essential for examining policies and their impact on student success.
>
> PORTLAND STATE UNIVERSITY "

PLAN A HOLDS ASSESSMENT

The Policy Influences guide outlines the types of federal, state, governing system, and other influences identified by the institutions in the *No Holding Back* project, and other useful insights, that can be a useful starting point for a systematic policy inventory.

Based on what is learned from the policy inventory, institutions may find opportunities for improvements such as these:

▶ Reduce, consolidate, and refine the holds that are available for staff to place on student accounts.

▶ Clarify the procedures, documentation, and process for:

- Using available holds
- Requesting or originating new holds
- A periodic review of holds
- Governing, approving, and modifying available holds.

▶ Institute options other than registration holds to provide information to students, guide them through requirements, alert them of a need for action, or get payment on owed balances.

▶ Implement data monitoring and review of holds usage, including who has access to this information, how it will be made available, and how it will be used.

▶ Improve how holds are communicated, shifting the focus of content from administrative language to student-centered messaging across channels, including webpages, course catalogs, student agreements and codes of conduct, online student portals, emails, and text messages.

Consult Students

Consider how you can get student feedback about their experience with holds. This can be especially useful for things that cannot be revealed by data, for example:

▶ Contributing factors to observed patterns in hold usage that vary by type of student

▶ Preferred methods of communication

▶ Why students do not respond to certain types of communications

The Student Perspectives guide details the perspectives of 50 students from 10 of the participating institutions about their experience with holds and includes sample material for student focus groups or interviews.

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

> When we discontinued placing registration holds on students in poor academic standing, their responsiveness to notifications of required actions dropped only by 1%.
>
> CALIFORNIA STATE UNIVERSITY-FULLERTON

> We want to change the language we use with students and not use the word "hold", which can be scary or off-putting to students. But this word is also used in so many systems and tools that we utilize that are created by third parties. We are hoping to shed a light on the role of these systems.
>
> LARAMIE COUNTY COMMUNITY COLLEGE

> We are beginning conversations with stakeholders on alternative methods for student support beyond the hold, in hopes to eliminate several student success holds.
>
> UNIVERSITY OF ARIZONA

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

Share with us here:
www.wiche.edu/
administrative-holds/share

WICHE
Western Interstate Commission for Higher Education

DATA AND EVIDENCE

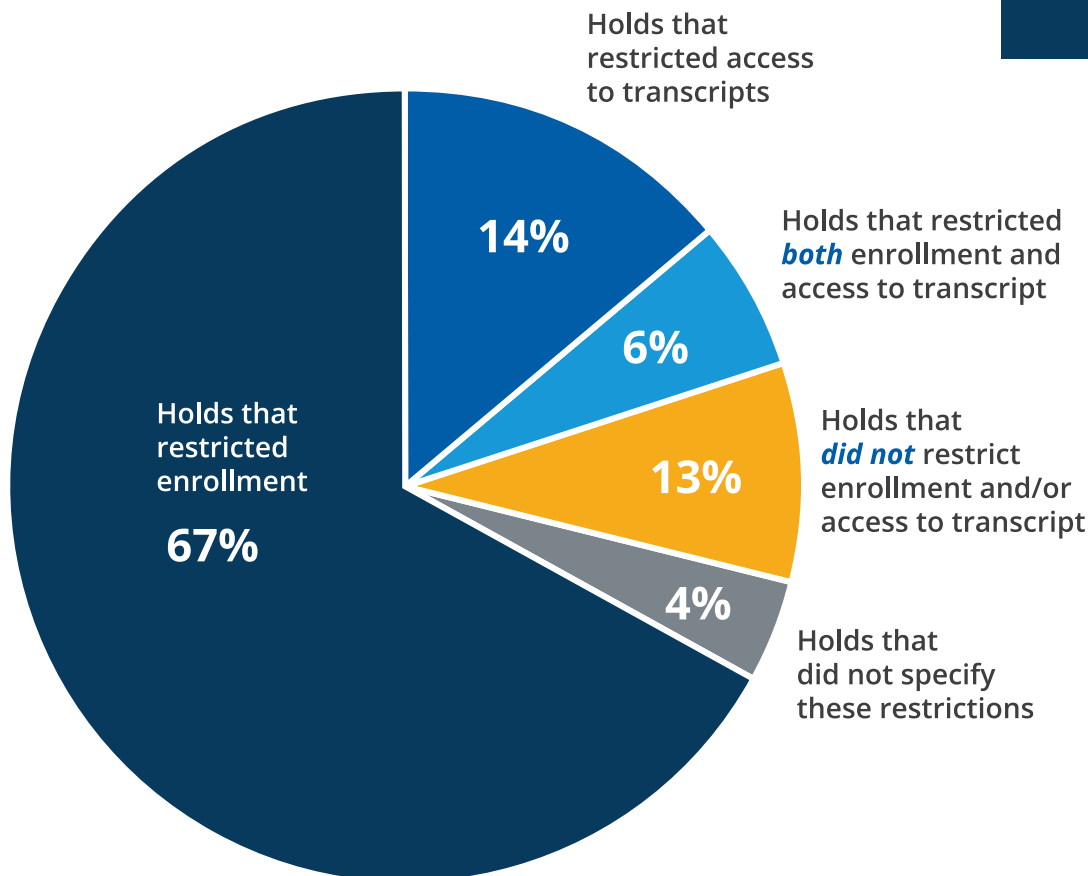## TOOLS FOR ASSESSING ADMINISTRATIVE HOLDS

Compiling and analyzing available data is a foundational part of assessing holds at an institution. Staff availability and capacity, and data availability, are real challenges, but 12 public institutions in the No Holding Back project piloted a basic approach to analysis and gained insights to how they might improve the use of holds at their institutions.

For example, the data showed that many more holds were in place than most institutions expected. Potentially 250,000 or more holds were placed in total across the reporting institutions during academic year 2021–22 (AY 2021–22), restricting registration, transcripts, or diplomas; with 94% placed by the four-year institutions. By comparison, approximately 120,000 degree-seeking undergraduates were enrolled across these reporting institutions in AY 2021–22. The bursar and registrar units originated most of the holds.

> "We started with 89 holds and inactivated 57. We are still evaluating the remaining 32 to see if we can further reduce or eliminate as well as working on changing processes to support that." Laramie County Community College
>
> LARAMIE COUNTY COMMUNITY COLLEGE

Holds Activity Across 12 Institutions

Holds that restricted access to transcripts — 14%

Holds that restricted *both* enrollment and access to transcript — 6%

Holds that *did not* restrict enrollment and/or access to transcript — 13%

Holds that did not specify these restrictions — 4%

Holds that restricted enrollment — 67%

(continued)

DATA AND EVIDENCE

Starting Ideas

▶ **Consult this available** technical guide **and** workbook **for details about possible data to gather.** The guide provides a sample framework for regression, ordinary least squares analysis, and exploratory crosstabs to test the association of student characteristics, unresolved debt amounts, and holds that restrict access to registration or transcripts. Institutions with sufficient capacity and data may wish to expand their analysis; for example, analyzing more than a single year and examining both resolved and unresolved holds..

▶ **Get an understanding of what data are stored, and at what level of detail, early in the planning phase.** Answering questions about the full impact and experience of holds for different types of students often requires data beyond what is immediately available.

For example:

- The completion of current semester advising may reset a student advising hold.

- Payments can overwrite, reset or delete payment dates and other data.

- The definition or meaning of a date or data element might vary by type of hold or across departments or staff.

▶ **If data are limited or incomplete, look for insights from immediately available data.** This can be accomplished while requesting changes to data storage or planning more detailed analysis for the future.

▶ **Determine your capacity for analysis, in terms of staff, time, and resources.**

▶ **Determine what intensity or type of analysis will be compelling for your stakeholders.**

💡 Graduate students helped to do some of the analysis at one four-year institution. The students also conducted a focus group and received feedback from students.

💡 Explore your data through cross-tabulation in addition to more rigorous statistical analysis, as demonstrated in the 'Detailed Crosstabs' section of the sample workbook. Cross tabulations are a useful tool for disaggregating data, identifying potential relationships between variables, and revealing possible disparities, disproportions, or intersectional factors. Keep in mind, however, that crosstabs alone do not necessarily identify statistical significance.

(continued)

An available technical guide and workbook provide a starting point for an institution's quantitative assessment of holds activity. Other considerations and inspiration may be found in the pages below, including the summary of results from this project.

DATA AND EVIDENCE

▶ **Clarify and prioritize research questions to streamline data collection and clarify appropriate analysis methods.**

For example:

- What number and percent of students experience holds annually? Which kind(s) of holds?

- Are there differences in students' experiences of holds at this institution? Which students receive more holds? Which have higher or lower hold amounts? Which students resolve holds at higher or lower rates? Which students with holds have different enrollment or retention patterns?

  Data points to consider:

  - Student demographics (age, gender identity, race/ethnicity, family education, academic indicators)

  - Pathway (first-year/transfer/continuing, in-/out-of-state)

  - Major field of study, college/department

  - Financial status or arrangements, dependency status (grant, loan, military benefits, public benefits, employer reimbursement)• Degree- and non-degree/-certificate students

  - Other relevant characteristics of your student population for which holds usage or impact might differ by type of student (undocumented students, foreign students)

- Do patterns differ after a change in holds policy or practice?

- Do debt hold patterns differ before and after Higher Education Emergency Relief Fund (HEERF) funding? Or before and after other disruptions or changes?

- How long are holds outstanding (unresolved), by type and amount of hold? How does this relate to other academic year events and financial cycles?

- What do the data suggest about financial thresholds? For example:

  - At what amount are holds applied for different account balances? For example, owed tuition, library fines, or parking fees?

  - How do financial balance or debt hold amounts compare to state funding per student? At what point do debts become a sufficient business risk?

  - What portion of financial debts are due to Return of Title IV Funds (R2T4)?

(continued)

> " We learned that student experiences with registration holds vary immensely from discipline to discipline. Students of the department generating the second-greatest number of major-based holds were likely to carry more than 16 holds in their first two years; other departments and majors had vastly lower rates. The Associate Dean of that college immediately led efforts to change how student requirements for those majors is enforced.
>
> CALIFORNIA STATE UNIVERSITY, FULLERTON "

> " Fifty percent (50%) of students with a debt hold owe less than $2,000, and over 40% owe less than $1,000. The total amount of debt that these students with $2,000 or less owed comes to only about 25% of all unresolved debt. The silver lining of finding this out was seeing that if we were to successfully revise our policies to increase the threshold for hold placement, we could potentially remove roadblocks for a relatively high number of students for relatively low financial risk.
>
> UNIVERSITY OF NEVADA, LAS VEGAS "

DATA AND EVIDENCE

- How effective do holds appear to be as a tool for achieving compliance?

- Is there evidence that students can differentiate the urgency or severity of the different holds, or that they can understand holds as distinct from other information prompts which do not limit registration or documents? ['type' or 'category' icon]

- Is there a relationship between types of holds and academic success (persistence, retention, credit accumulation, completion, transfer)? Do advising holds appear to help or hinder student success? ['success' or 'accomplished' icon; and 'type' or 'category' icon]

- Also see the Transcript Holds guide for specific considerations for debt-related and transcript holds

When interpreting results consider: Do holds have a primary, contributing or no association with what is observed? What other factors might explain observed or confirmed patterns?

Student Perspectives

A key focus of the No Holding Back project was whether there were differences for holds for students of color and lower-income students. Overall, across the participating institutions, the institutional analysis indicated that Pell recipients, Hispanic students (of any race), non-Hispanic American Indian/Alaska Native, Black, and Native Hawaiian or other Pacific Islander students were less likely than average to have the holds they experienced resolved within the single year analyzed--both for financial and other types of holds. And in the year analyzed, Pell students were less likely to experience financial holds.

> " Alaska Native students, including those who identify as two or more races, received a disproportionate number of holds compared to all students. Also, Pell-eligible students were likely to have $1,103 more in their hold amount compared to non-Pell-eligible students. We continue to explore both of these.
>
> UNIVERSITY OF ALASKA SOUTHEAST "

> " If I can't pay my debt of $1500, then I won't be able to pay an additional fee of $100 to remove the hold. I just need more time, or an opportunity to explain what is going on. The payment plans having immediate consequences really doesn't make sense.
>
> STUDENT AT 4-YEAR UNIVERSITY "

STUDENT CHARACTERISTIC	% OF SAMPLE	RATE EXPERIENCED HOLDS (COMPARED TO AVG.)	RATE RESOLVED HOLDS (COMPARED TO AVG.)
Pell recipient	35%	▼ As likely or less likely	▼ Less likely
Hispanic (of any race), non-Hispanic American Indian/Alaska Native, Black, and Native Hawai'ian/Other Pacific Islander	32%	▲ More likely	▼ Less likely

DATA AND EVIDENCE

WICHE also heard detailed perspectives from 50 students from 10 of the participating institutions about their experience with holds (see other student perspectives and videos online).

Siemour* was attending a four-year university when we spoke with them. Siemour recalled the experience of a registration hold due to an unpaid debt. They increased their work hours to make the payment but were less able to focus on classes. When the hold was lifted, they had to register for classes outside their required coursework because the required courses were no longer available.

Ocean* was attending a four-year university when WICHE heard from them about the expectation to fully understand and respond to holds upon first arriving on campus. Ocean was unable to register for their first-year classes and saw a "general hold" message in the student portal. Not understanding it, Ocean ignored it, hoping it was about a process that would resolve itself. In the end, Ocean faced $300 in late fees and extensive work with the financial aid office to resolve the hold. Once Ocean knew to contact financial aid, they experienced flexibility and support in the form of resilience funds.

> " It felt like I was already supposed to know about holds...to know everything about where to get resources and how to use every platform, and if you don't, you're met with condescension. *You don't know how to log on (to the student portal)? You don't know where the rec center is?*
>
> STUDENT AT 4-YEAR UNIVERSITY "

*Actual names not used to provide anonymity to interviewed students. Information has been anonymized unless express permission to attribute was granted.

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

Share with us here: www.wiche.edu/ administrative-holds/share

WICHE
Western Interstate Commission for Higher Education

*Note: Information has been anonymized unless express permission to attribute was granted.
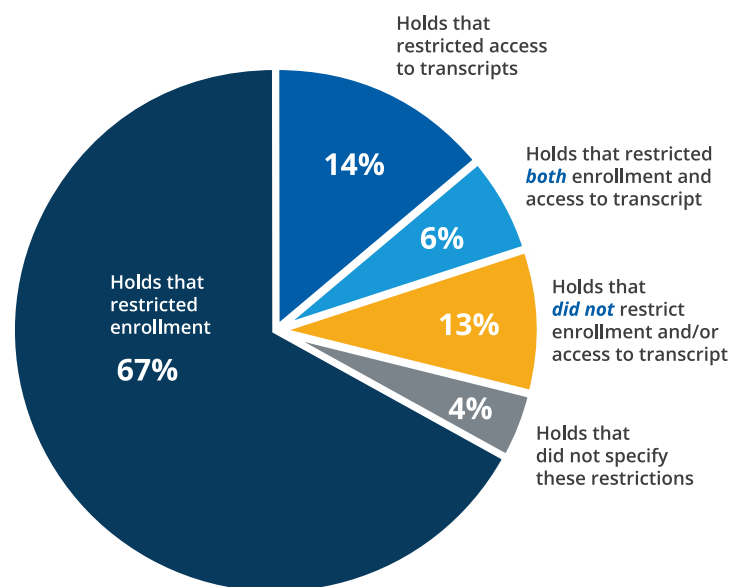
Project Data Summary

💡 **TIP:** Which of these patterns are likely at your institution? What ideas does this provide for your holds assessment? Review the data notes for important considerations for your analysis.

The 12 institutions that participated in the No Holding Back project from August 2022 to August 2023 contributed standardized results from their research. The institutions ran their own analysis. WICHE and AACRAO did not have access to individual student data or detailed data for independent analysis. Results that were possible to summarize across institutions are shown below, with important caveats. **These results are meant for illustration and a basic overview of the analysis approach piloted by the No Holding Back institutions, not as statistically evaluated findings.**

The analysis timeframe for academic year 2021-22 overlapped with the COVID-19 pandemic, so institutions were encouraged to consider how factors like enrollment changes and CARES Act Higher Education Emergency Relief Fund availability may have impacted findings. Standardized analysis and summary may mask important contextual variation. To limit burden, increase feasibility, and acknowledge data limitations, institutions were not asked to provide substantially detailed analysis, but many institutions conducted more in-depth analysis for their own purposes.

Types of Active Holds Across 12 Institutions

Institutions were asked to only include holds that limited or restricted access to enrollment (registration) or a transcript (or diploma). It was not possible for all institutions to isolate holds to this level of precision.

Holds that restricted access to transcripts — 14%

Holds that restricted *both* enrollment and access to transcript — 6%

Holds that *did not* restrict enrollment and/or access to transcript — 13%

Holds that did not specify these restrictions — 4%

Holds that restricted enrollment — 67%

Source: WICHE analysis of holds usage data from 12 institutions participating in the No Holding Back project. Note: data indicate the number of named holds present in student information systems, which is a different metric than the number of students with that type of hold (see below).
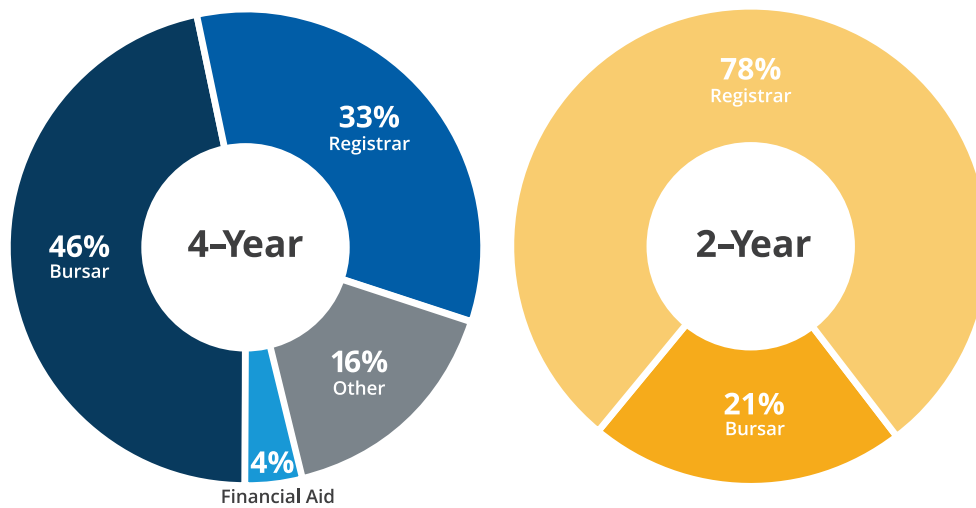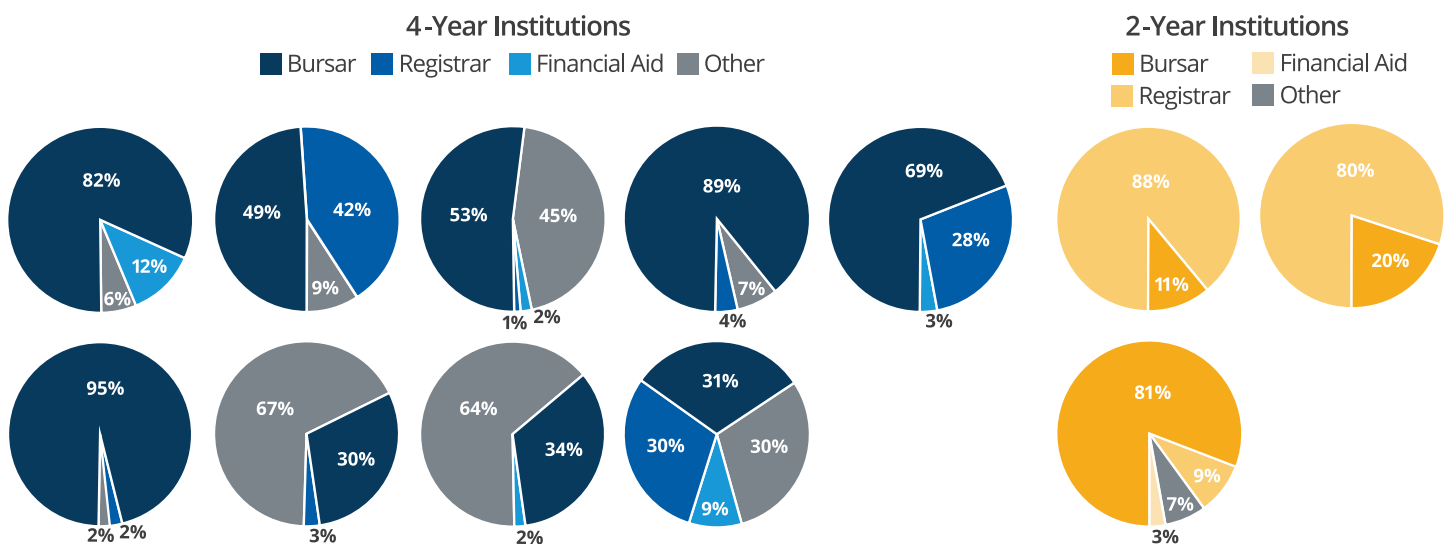
(continued)

Percent of Holds Applied in AY 2021-22, By Department

Potentially **250,000 or more holds** were placed in total across **11 participating institutions during AY 2021-22**, restricting registration, transcripts or diplomas (**94% were by four-year institutions**). By comparison, approximately **120,000 degree-seeking undergraduates** were enrolled across these institutions in AY 2021-22. There was wide variation across institutions in which departments were associated with the most holds activity, but the bursar and registrar's office were the most likely to initiate holds.

Combined Rate Across Institutions, by Sector

4–Year
- 33% Registrar
- 16% Other
- 4% Financial Aid
- 46% Bursar

2–Year
- 78% Registrar
- 21% Bursar

Rate by Individual Institution

4-Year Institutions
Legend: Bursar, Registrar, Financial Aid, Other

- 82%, 12%, 6%
- 49%, 42%, 9%
- 53%, 45%, 1%, 2%
- 89%, 7%, 4%
- 69%, 28%, 3%
- 95%, 2%, 2%
- 67%, 30%, 3%
- 64%, 34%, 2%
- 31%, 30%, 30%, 9%

2-Year Institutions
Legend: Bursar, Financial Aid, Registrar, Other

- 88%, 11%
- 80%, 20%
- 81%, 9%, 7%, 3%

Note: Institutions not labeled for confidentiality reasons. Source: WICHE analysis of tabulation output from 11 institutions' analysis of their student-level data, from the institutions participating in the No Holding Back project; one institution did not provide these data. Note: some institutions may have tabulated distinct counts of students with at least one hold; others, the total number of hold instances.
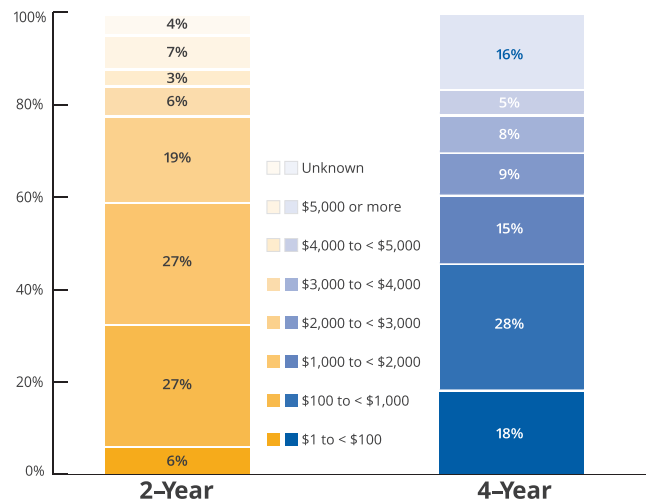
(continued)

Unresolved Debt Amounts

As part of their assessments, the participating institutions analyzed unresolved financial holds in greater detail, in this case, the maximum unresolved financial obligation per student with these holds.

Percent of Students With One or More Unresolved Financial Holds

Legend:
- 2-Year Institutions
- 4-Year Institutions

Bar values: 0, 2%, 9%, 10%, 11%, 13%, 14%, 18%, 21%, 40%
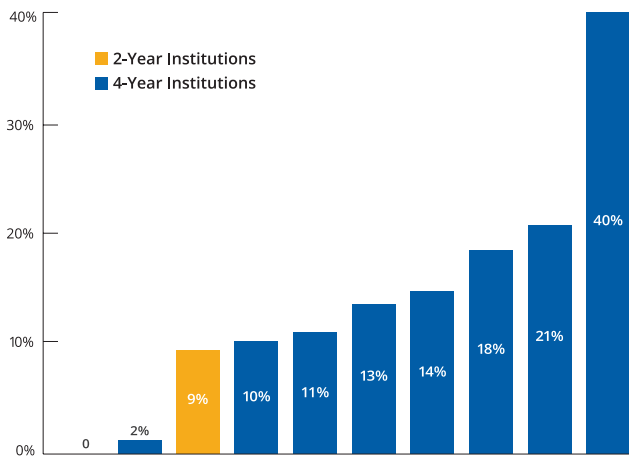
Amount of Financial Obligation Associated With the Unresolved Financial Hold

2-Year column: 6%, 27%, 27%, 19%, 6%, 3%, 7%, 4%
4-Year column: 18%, 28%, 15%, 9%, 8%, 5%, 16%

Legend:
- Unknown
- $5,000 or more
- $4,000 to < $5,000
- $3,000 to < $4,000
- $2,000 to < $3,000
- $1,000 to < $2,000
- $100 to < $1,000
- $1 to < $100

Note: Rate for ten institutions with these data. Institutions not labeled for confidentiality reasons.

Source: WICHE analysis of tabulation output from 11 institutions' analysis of their student-level data, from the institutions participating in the No Holding Back project. Note: results represent the maximum unresolved financial obligation associated with a given hold, per student with these holds in AY 2021-22. Not all institutions provided all details. May include some imprecision, for example, where having both a registration and transcript hold for an amount led to double-counting, variation in how data were available or were reported, and contextual variation in the use of holds.

▸ On average, overall, debt holds were resolved for 88% of the 111,300 students who had them (across 10 institutions).

▸ About 14,000 students had unresolved financial obligations in AY 2021-22, equalling a combined total of $30.6 million (across 11 institutions). For a very small percentage, the unresolved debt related to less than $100. The most prevalent holds were for debt amounts between $1,000 and $3,000.

Further intitutional analysis of unresolved hold amounts by 10 institutions in AY 2021-22 showed:

▸ The minimum unresolved debt amount for any student ranged from $1 to $270, and the maximum ranged from $4,290 to $33,600.

▸ The total outstanding balance associated with these unresolved debt holds ranged from $72,000 to $18.1M.

(continued)

Rate at Which Different Types of Students Resolved Holds

Because a key focus of the No Holding Back project was whether students of color and lower-income students experience holds differently than other students, each institution analyzed holds resolution among Pell recipients and by race/ethnicity. On the whole across 11 reporting institutions, in AY 2021-22:

▶ Pell recipients, who were 35% of the students in this sample, were as likely or less likely than average to experience holds, but also less likely to have them resolved.

▶ Hispanic students (of any race), non-Hispanic American Indian/Alaska Native, Black, or Native Hawai'ian/Other Pacific Islander students, who were 32% of the students in this sample, were more likely to experience debt-related holds and less likely than average to have them resolved, with some variation by type of hold and student.

Within these overall trends, there was variation by institution and type of holds.

	HAD HOLDS				ALL HOLDS RESOLVED			
	Transcript Holds	Registration Holds	Debt Holds	All Hold Types	Transcript Holds	Registration Holds	Debt Holds	All Hold Types
ALL STUDENTS (Pell)	**55%**	**55%**	**55%**	**73%**	**67%**	**69%**	**64%**	**67%**
Pell Recipient	52%	55%	53%	74%	62%	66%	54%	64%
Not a Pell Recipient	58%	54%	57%	71%	69%	71%	71%	68%
ALL STUDENTS (Race/Ethnicity)	**55%**	**54%**	**54%**	**70%**	**61%**	**67%**	**61%**	**67%**
COMBINED CATEGORIES								
Hispanic any race or non-Hispanic American Indian/Alaska Native, Black, or Native Hawai'ian/Other Pacific Islander	60%	51%	57%	69%	60%	64%	61%	61%
Other race	53%	55%	53%	72%	62%	69%	62%	70%
Race unknown	43%	64%	44%	64%	52%	66%	49%	70%
Foreign/non-resident	67%	49%	67%	64%	59%	72%	59%	73%
SPECIFIC CATEGORIES								
White	56%	55%	55%	73%	62%	69%	61%	70%
Hispanic any race	65%	50%	59%	68%	64%	67%	64%	64%
American Indian/Alaska Native	64%	52%	55%	78%	52%	57%	52%	56%
Asian	35%	45%	34%	50%	67%	71%	66%	69%
Black/African American	62%	59%	55%	73%	49%	56%	48%	54%
Native Hawai'ian/Other Pacific Islander	17%	22%	16%	28%	40%	44%	39%	42%
Two or More Races	54%	61%	53%	72%	60%	66%	58%	66%

Source: WICHE analysis of tabulation output from 11 institutions' analysis of their student-level data, from the institutions participating in the No Holding Back project. Note: one institution did not provide these data, and three institutions did not provide results by detailed race/ethnicity categories, so higher-level categorizations are also shown. According to IPEDS data, in total the 11 institutions enrolled about 120,000 degree-seeking undergraduates in AY 2021-22, but the maximum number of students reported in any cross-tabulation was 105,000, likely due to limitations in identifying holds actvity.

(continued)

Institutions also performed regression and ordinary least squares analysis to investigate associations between certain demographics and holds activity and debt amounts. This further analysis is not summarized due to limitations on comparability and in many cases, too few students for these statistical analyses.

> "
> One of the key findings from our data analysis was the relationship between student race/ethnicity and debt amount. Specifically, identifying as Black, Native American/Alaskan Native, or Native Hawaiian/Other Pacific Islander seemed to be positively and significantly related to debt amount and unresolved debt amount. While we did not find statistically significant positive relationships between Pell recipients and debt amounts, we do not fully trust that finding given the study period: I.e., many students who would otherwise have debt-related holds did not have them during the study period simply because of emergency funding made available during the COVID-19 pandemic.
>
> UNIVERSITY OF NEVADA, LAS VEGAS
> "

STUDENT PERSPECTIVES

TOOLS FOR ASSESSING ADMINISTRATIVE HOLDS

As part of the No Holding Back project, **WICHE conducted student focus groups with 50 students from 10 institutions. The intent of these focus groups was to capture student perspectives regarding policies and practices around administrative and student success holds at the participating institutions.**

Students were asked:

▶ To define the term "hold" as they understood it and identify times that they, friends, or classmates had experienced a hold.

▶ How they navigated the holds process, who they interacted with, how they were communicated with, and how they resolved their holds.

▶ About any impacts of experiencing and navigating holds.

▶ Insights or recommendations they would offer for higher education leaders and policy makers.

Students self-identified as belonging to one or more demographic groups when they registered for the focus groups. Most students identified with more than one racial or ethnic identity.

Additionally, 10% of the students described being transfer students, and many described themselves in ways that are often associated with 'non-traditional' learners: self-described 'adult' students, parents, or students who stopped out and returned to school, did not have parental or familial support, or veterans.

WICHE sought insights from former students as well, but only currently enrolled students attended the focus groups. Focus groups were conducted via videoconference.

Starting Ideas

Student perspectives can be an important part of an assessment of administrative holds. This guide, as well as student quotes and profiles that can be found among other resources from No Holding Back project, provide possible approaches to exploring student insights. However, existing research about best practices for obtaining student feedback should also be consulted.

(continued)

Who Did We Hear From?

50% White
22% Hispanic
8% Asian
36% Black or African-American
14% American Indian or Native Alaskan

50% Female
44% Male
6% Non-binary, Gender Nonconforming, or Undisclosed

72% Received Pell Grant
22% Did Not Receive Pell Grant
6% Undisclosed
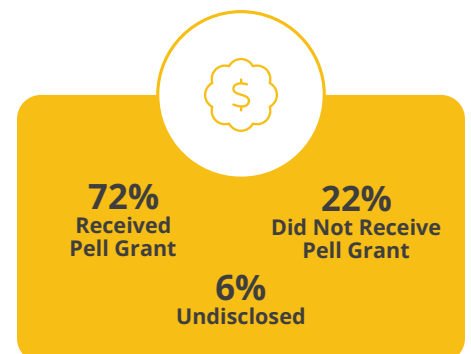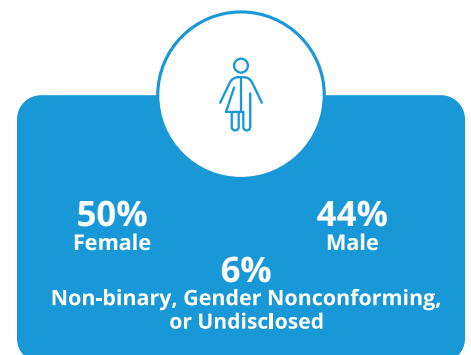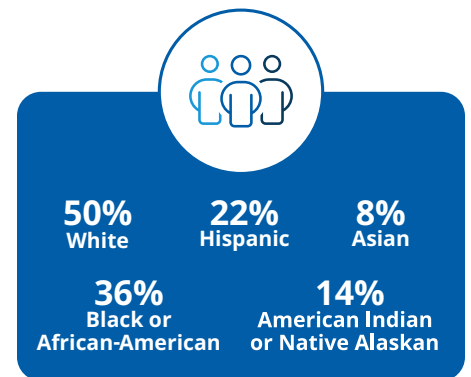
▶ Questions used for the *No Holding Back* student focus groups, shown at the end of this guide, are a possible starting point for planning student interviews or focus groups.

▶ Know whether, how, and when to seek institutional review board approval.

▶ Consider authentic and student-centered opportunities to involve students and learn about their needs, concerns, or impressions, for example:

- Student journalism, student groups and clubs, student government and leadership.
- Courses such as statistics and higher education policy, for which analyzing holds might constitute a class project or student research opportunity.

▶ Seek a wide range of student perspectives and consider what might limit certain students from providing their perspective, for example:

- Conduct outreach to students who are no longer enrolled but are, or were, affected by holds.
- Use multiple methods for getting feedback to optimize student involvement.
- Bear in mind student work schedules or conflicts with work or home responsibilities, transportation, needs for special accommodation, and digital access limitations.

▶ Use student-centered, descriptive language, not just administrative terminology. For example, refer to holds in practical terms, such as when students couldn't register for classes, couldn't receive their financial aid, or were required to meet with a staff member. These terms can be more effective than institutional jargon like 'administrative hold' or 'debt hold'.

" "Graduate students did some of the data analysis about holds. They also conducted a student focus group, which surfaced that students often don't know they have a hold until they try to register for classes or access their transcript. Students want improved communication regarding when holds are placed and how to resolve holds. We are using this feedback to improve communication to students and staff, including in Spring 2024, a webpage dedicated to explaining holds and how to resolve them and possibly posters with QR codes directing to students to the website in various places around campus.

IDAHO STATE UNIVERSITY "

Student Perspectives

Selected experiences and testimony from the 50 students who participated in focus groups are highlighted throughout the [No Holding Back resources](#). Here are some common themes:

▶ Students often could not differentiate or name types of holds, but described the impact they had on them, often in more conversational terms.

▶ Students acknowledged that institutions need a way to prompt action and hold students accountable to their financial responsibilities to the institution.

" Why can't you just give a due date? Why does it have to impact registration?

STUDENT AT 4-YEAR UNIVERSITY "

(continued)

▶ Students who could interpret a hold alert and found them easy to resolve were less likely to describe the experience as a hold stoppage on certain activity and more as a benign process. Students who experienced efficient and successful holds processes often described feeling a sense of trust and well-being in their college.

▶ Conversely, students expressed resentment of processes they perceived as bureaucratic, and for some, errors and institutional miscommunications amplified their impression that institutions didn't care about students. Students stated that the experience changed their impression of the institution, from being primarily focused on their academic success to primarily focused on profitability.

▶ Students often described the experience of holds for administrative purposes as stressful, punitive, and demoralizing.

▶ Students described greater emotional and psychological stress associated with financial-related holds, even those that were functionally easy to resolve.

▶ Students explained that life challenges or circumstances overtook the possibility or priority of taking a college administrative action or clearing the hold. Some students with persistent holds experienced ongoing challenges outside of school and saw holds as part of a compounding cycle of challenges. In some cases the stress of experiencing holds was exacerbated by a lack of access to needed mental health supports.

▶ Students frequently described a hold as the end-point in what felt like a chain of ineffective communication or lack of communication about administrative processes.

Students offered recommendations and requests, including:

▶ Alternative mechanisms to prompt or enforce necessary administrative tasks, including proactive and effective communication, rather than restricting registration.

▶ Proactive communication to alert students to impending or upcoming holds and reasons for them, including advance alerts about the impact of a hold on the next semester's registration, particularly from spring to fall semester.

▶ Improved and increased communication about holds, including:

  • Preventative communication prior to receiving a hold

  • Clear and detailed information about the process and timelines for lifting the hold

  • Ongoing communication during the life of the hold

  • Affirmative confirmation that the hold had been released from their account

(continued)

> " They text us all the time for events and stuff like that, so why not about holds?
>
> STUDENT AT COMMUNITY COLLEGE "

> " Not every student who is struggling or needs supports is failing their classes. All students need support.
>
> STUDENT AT COMMUNITY COLLEGE "

> " If I had advice for the institution, it is to communicate with the students every semester to remind about how to avoid holds, and there should be a grace period.
>
> STUDENT AT COMMUNITY COLLEGE "

- Staff and advisor contact to help students avoid future holds, particularly when holds related to challenging life circumstances.

- More frequent, detailed, and continual communications using a range of channels (text, email, student portal, postal mail, phone calls, and in-person meetings)

▶ Consolidated, centralized, liaison, or triage approaches to resolving holds. These could include a dedicated staff member or office to assist on more than one type of hold, seamlessly contact or hand-off to other relevant staff, and manage institution-led follow up.

▶ Student-centered and positive language and terminology regarding holds, rather than administrative terms, jargon, or punitive messaging.

▶ Rapid appeals options, especially for holds placed in error or related to incongruent aid and payment schedules, and overall, increased payment flexibility.

Institution Perspectives

Institutions in the project expressed a desire to hear and consider what students need.

> " Ask students often about what they see or experience as inequities in institutional practices and take intentional steps to remove them. "
>
> UNIVERSITY OF GUAM

> " Consider holds from the student's point of view. Ask the questions: is the process, practice, or policy student centered, is it equitable, does it impose an unnecessary burden on students? "
>
> PORTLAND STATE UNIVERSITY

Do you have a story, perspective or idea about this?

Share with us here: www.wiche.edu/ administrative-holds/share

WICHE
Western Interstate Commission for Higher Education

Sample Student Focus Group Guide

This demonstrates the focus group guide utilized for the No Holding Back project, to capture student perspectives regarding administrative and student success holds policies and practices. This guide is for demonstration only, and is not a comprehensive, validated focus group planning tool. See also the important considerations and examples for getting student perspectives, in the foregoing Student Perspectives guide.

When engaging a focus group, consider:

▶ Introduce yourself and provide background information about the purpose of the focus group and how the information will be used

▶ Offer an appreciation gift for participant time, e.g., gift card, institutional 'schwag' or educational or organizational tool

▶ Establish and agree upon meeting behavior

  • Meeting time limits and giving 'equal time' across participants

  • Permission to skip or choose not to answer a question

  • What is shared will not be disclosed outside of the meeting by other participants

▶ Obtain informed consent, including confidentiality assurances, consent for recording, and so forth.

Discussion Topics & Questions to Participants

▶ Ask everyone to introduce themselves. You may consider asking students to share information such as: what year are they in? What is their major? Are they transfer students? What are their educational goals?

▶ Let's talk about what a 'hold' is. Had you all ever heard of the term "debt hold," "financial aid hold," "administrative hold," or "Student success holds" before I reached out?

  • Probe: where did you hear the term? From whom?

▶ Could you describe when you experienced a time you couldn't register for classes or access your transcript, and how that affected you personally? Going through school and in your careers has it affected you any?

  • Can anyone describe your experience having a hold on your records related to a debt or unpaid balance?

  • Have any of you been affected by these holds in terms of your financial situation—for example, whether you had sufficient financial aid or your own money to clear holds? [Conversely, probe for someone who didn't have trouble clearing debt, and how they were able to…]

▶ And so now that you've been recruited for this discussion, what is your understanding of what these holds are?

  • Follow up probe: Before getting recruited for this discussion, did you clearly understand what these were and why your college used them, or were you less clear?

▶ And let's talk about how you got information about holds being used. Do you remember how you were informed, like by text or email? Were you able to tell when you got messages or alerts about things, which needed to be taken care of to be able to register or get your transcript, and which were just informational or optional?

- How could your institution better share information about these holds with students?

▶ Now--how does (or how did) your institution help you overcome those holds? (I.e. remove the barrier to letting you register for classes or accessing your transcript, payment plan?)

- Were you able to get the hold removed? Was it clear and easy enough, or not?

- If not, how did your institution make it harder for you?

- So, in a perfect world, what do you all think should be done to help students overcome these holds? [From your perspective, did these holds help you?—to not get behind on payments, or in your schooling? Or did they do something other than help you?]

▶ How do you think this is affecting other students? Have you heard of this happening to other people?

▶ Do you all have anything else you'd like policy makers or higher education leaders to think about on this issue; things you would want them to know?

POLICY INFLUENCES

TOOLS FOR ASSESSING ADMINISTRATIVE HOLDS

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	State	Higher Education Agency or System	Cross-State Agreements and Other Factors
Department of Education	Legislation and Regulations	Codified Policies	
Department of Defense	Strategic Initiatives	Strategic Initiatives	
Immigration and Customs Enforcement			
• Financial aid administration	• Debt collection	• Immunization documentation	• Cross-state articulation and tuition agreements
• Military benefits	• Transcript restrictions	• Students with balance	• Distance education
• Title IX training	• State authorization for online providers	• Advising requirements	• Out of state students
• Immigration regulations	• Attainment goals	• Student access and success	• Accrediting standards for student success
	• Completion campaigns	• Credit transfer	
		• Articulation	

POLICY INFLUENCES

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

• Advising requirements
• Conduct violations
• Athlete requirements
• Return of property or equipment
• Student success and support
• Payment plans
• Admissions paperwork
• Auxiliary units (housing, parking, bookstore)

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.

(continued)

> " 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 "

(continued)

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.

(continued)

> " 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** "

▶ 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.

(continued)

> " 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

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

WICHE
Western Interstate Commission for Higher Education

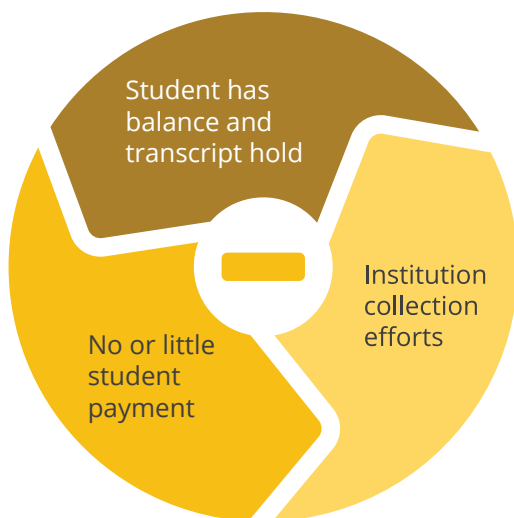# TRANSCRIPT HOLDS

TOOLS FOR ASSESSING ADMINISTRATIVE HOLDS

The No Holding Back project **took a broad approach to assessing holds. The purpose of the project was to increase knowledge about the wide usages of holds and to uncover multiple examples and approaches rather than to produce comprehensive or conclusive findings. The 12 institutions in the project assessed the** use of holds that restricted registration, access to official records, or services, rather than focusing solely on transcript or debt-related holds.

Some learnings from the project that relate specifically to transcript holds include:

▶ Lower-income students and students of color received and resolved transcript holds and holds related to a debt at different rates than other students.

▶ Transcript holds were more often associated with codified mandates, such as state debt collection or federal financial aid regulations, than other types of holds.

Looking across and analyzing the full range of administrative holds might reveal for institutions where multiple holds are compounding and preceding a transcript hold (transcript holds may also include holds on diplomas). Insights from this analysis could inform proactive, student-centered approaches to help enrolled students reduce or settle their balances, prior to getting to the point of a transcript hold.

Typical Transcript Cycle

- Student has balance and transcript hold
- Institution collection efforts
- No or little student payment

Low Return on Collection Efforts

OR

Possible Preventative Cycle

- Clear, frequent student-centric communication
- Ongoing holds monitoring
- Interaction with student
- Student action
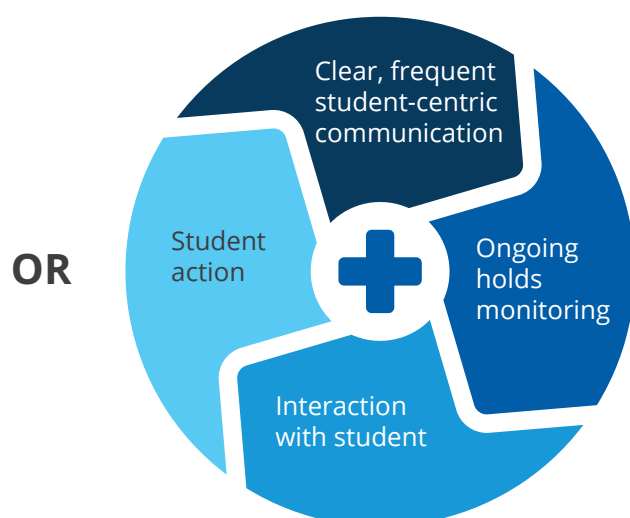
Analysis and Interactions to Prevent Transcript Hold

Starting Ideas

Existing and ongoing research and media coverage, which focus specifically on transcript holds, provide a solid body of knowledge about policies and perspectives relevant to an assessment of transcript holds (see Related Resources, below). Institutions may also consider the following when assessing transcript hold policies, based on the work of the 12 institutions in this project:

▶ **Know the formal policies and regulations that define your institution's use of transcript holds and possibilities for adjustments**. Refresh and reconfirm your detailed knowledge of the parameters, constraints, and opportunities for refining the use of transcript holds (see more about this in the Policy Influences guide).

▶ **Review data about the full lifecycle of holds students might experience** for any patterns that provide insight into the reasons students may disengage with a balance and incur transcript holds. For example:

- When and in what ways do students successfully pay down or settle their balances (frequency, amount, and timing of payments relative to payment deadlines or other monthly or semester milestones)?

- Are there variations in student payment patterns that correlate with student socioeconomic status, academic standing, age, receipt of financial aid, traditional/non-traditional status, or other demographic variables?

- Could holds be administered, timed or communicated to students differently?

- What options do students have for full or partial payment?

- Do students have sufficient options for inquiring about and fulfilling their financial obligations?

    💡 Utilize the available Technical Guide for Assessing Administrative Holds with Data, accompanying workbook, and examples and perspectives from other institutions in the Data and Evidence guide, for ideas for analysis.

▶ **Research and consider mechanisms that other colleges and universities offer to students with balances to pay down debts and re-enroll.**

(continued)

Related Resources

These resources provide a solid base of knowledge about policies and perspectives relevant to an assessment of transcript holds.

American Council on Education. (2022, October 12). *Joint Statement by Higher Education Associations on Importance of Clear, Fair Transcript Withholding Policies*. https://www.acenet.edu/Documents/Joint-Statement-Transcript-Withholding-101222.pdf.

Arrojos, M. (2023, July 31). *Here Are the States That Ban Colleges from Withholding Transcripts.* Bestcolleges.com. https://www.bestcolleges.com/news/2022/05/19/states-that-ban-college-transcript-withholding-student-debt.

Consumer Financial Protection Bureau (2022, September). *Supervisory Highlights Student Loan Servicing Special Edition. Issue 27: Fall 2022.* https://files.consumerfinance.gov/f/documents/cfpb_student-loan-servicing-supervisory-highlights-special-edition_report_2022-09.pdf.

Fulton, M. (2022, January). *Placing a Hold on Postsecondary Student Success. Education Commission of the States*. https://www.ecs.org/wp-content/uploads/Placing-a-Hold-on-Postsecondary-Student-Success.pdf.

Gardner, L. (2023, September 12). *Solving the Stranded-Credits Problem. Chronicle of Higher Education*. https://www.chronicle.com/featured/student-success/solving-standard-credits.

Kurzweil, M., Looker, E., and Pearce, B. (2023, September 27). *After Successful Pilot, the Ohio College Comeback Compact Moves to Full Implementation*. Ithaka S+R. https://sr.ithaka.org/blog/after-successful-pilot-the-ohio-college-comeback-compact-moves-to-full-implementation.

Lederman, D. (2022, May 3). I*nside Higher Ed, The Key Podcast, Episode 79: Withholding Transcripts to Collect Student Debt*. Inside Higher Ed. https://www.insidehighered.com/audio/2022/04/28/ep79-withholding-transcripts-collect-student-debt.

Karon, J., Ward, J. D., Hill, C. B., and Kurzweil, M. (2020, October 5). *Solving Stranded Credits: Assessing the Scope and Effects of Transcript Withholding on Students, States, and Institutions*. SR.Ithaka.org. https://doi.org/10.18665/sr.313978 and related works at https://sr.ithaka.org/publications/solving-stranded-credits.

Knott, C. (2023, June 6). *A 'Modest but Important Step' Against Transcript Withholding*. Inside Higher Education. https://www.insidehighered.com/news/government/student-aid-policy/2023/06/06/education-department-looks-ban-transcript-withholding.

National Association of College and University Business Officers. (2022, April 6). *2022 Joint Statement from AACRAO and NACUBO on the Use of Administrative-Process and Student-Success-Related Holds*. https://www.nacubo.org/Press-Releases/2022/2022%20Joint%20Statement%20from%20AACRAO%20and%20NACUBO%20on%20the%20Use%20of%20Holds

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

Perspectives

When we spoke with her for the No Holding Back project student focus groups, Simone* was a senior at a four-year university who had transferred, and reverse transferred between four institutions in two states. Simone recalled "financial holds" that "were never surprising or operationally difficult to clear" but presented a significant psychological hurdle. Simone recalled a transcript hold due to late payment (that was resolved by making payment), a financial aid hold due to a FAFSA change, and a hold due to a late payment on a payment plan. Simone also recalled a friend whose diploma was withheld due to a debt.

> In addition to our ongoing review of holds, we are also focused on providing or identifying best practices for wraparound services for students to avoid situations leading to holds.
>
> CENTRAL WASHINGTON UNIVERSITY

> Holds feel like a prison. School is so expensive, and to struggle to pay for it makes you feel like your life is on hold.
>
> STUDENT AT 4-YEAR UNIVERSITY

* Actual names not used to provide anonymity to interviewed students.

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

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

**Share with us here:
www.wiche.edu/
administrative-holds/share**

WICHE
Western Interstate Commission for Higher Education