



# NOT HELD BACK: EMPOWERING HIGHER EDUCATION INSTITUTIONS TO ASSESS ADMINISTRATIVE HOLDS

SUMMARY FROM THE *NO HOLDING BACK* PROJECT

# CONTENTS

<b>Turning Research Into Action</b>	<b>3</b>
<b>Using Evidence for Planning</b>	<b>5</b>
<b>Inequity in Administrative Holds</b>	<b>8</b>
<b>Policies and External Influences</b>	<b>11</b>
<b>Improving Processes and Practices</b>	<b>13</b>
<b>Next Steps</b>	<b>15</b>

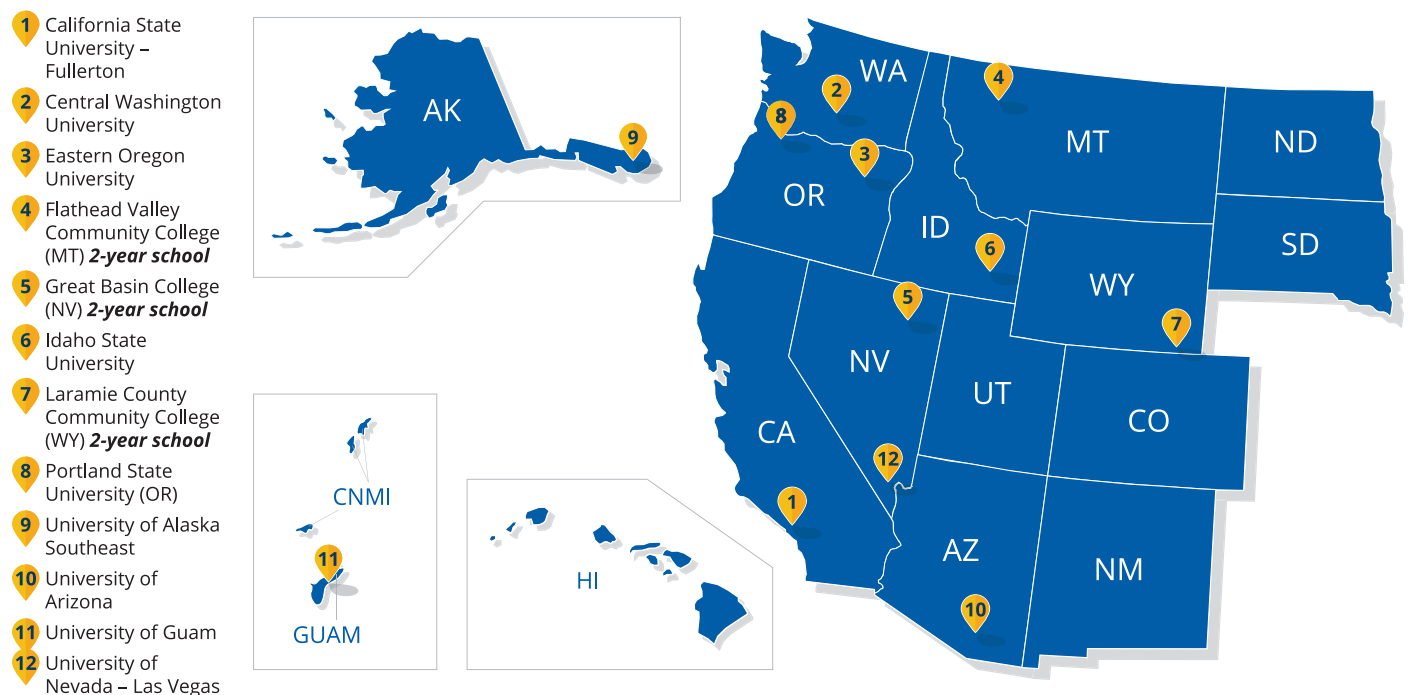
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# TURNING RESEARCH INTO ACTION

Amidst increased public and legislative scrutiny of the use of administrative holds on college student accounts (particularly holds on student [transcripts](#) for debts owed), 12 public colleges and universities in the U.S. West worked as a learning community for one year to analyze their administrative hold data, policies, processes, and practices, learn from each other, and contribute to [existing research](#) about holds usage.<sup>1</sup>

The project, titled [No Holding Back](#), was led by the Western Interstate Commission for Higher Education (WICHE), which held focus groups of students from the participating colleges and universities, and the [Association of Collegiate Registrars and Admissions Officers \(AACRAO\)](#), which provided technical guidance for a standardized approach to data analysis.



Awareness of this topic has continued to increase as part of an ongoing public and legislative conversation about the value of higher education and affordability, culminating in additional state and federal regulations restricting the use of transcript holds in 2023. The policies and processes around holds are also relevant to broader dialogue, as states and institutions face enrollment changes and challenges while also trying to improve completion.

A goal of the No Holding Back project was to provide clarity about federal, state, and other [policy influences](#) on the use of administrative holds by postsecondary institutions. Additionally, the project sought to determine whether [students](#) of color and lower-income students experience holds differently than other students.

The rich detail generated through this project is presented as guides and approaches, video and testimonial spotlights, as well as this summary of themes and learnings at [www.wiche.edu/administrative-holds](http://www.wiche.edu/administrative-holds); additional resources may be added in the future. The work from No Holding Back supports a range of stakeholders wishing to take action and harmonize administrative processes with student needs to achieve both institutional and student success.



## **HARMONIZING ADMINISTRATIVE HOLDS FOR INSTITUTIONAL AND STUDENT SUCCESS**

If a detailed assessment of holds is not possible for all institutions, institutions can make it common practice to reflect upon questions like:

- ▶ How are we using holds?
- ▶ Does the student experience of holds reflect our positive intent?
- ▶ What evidence do we find that holds are supporting both student success and institutional viability?

# USING EVIDENCE FOR PLANNING

Each of the public colleges and universities in the No Holding Back project conducted comprehensive, robust quantitative analysis about their use of holds. Their research results spoke to the benefits of analyzing all possible types of holds that limited access to enrollment, registration, or an official transcript, including holds commonly referred to as financial holds, academic holds, student success holds, and others (see the video [What are Administrative Holds](#)).

Guided by a standard prototype provided for the project by AACRAO, the institutions conducted their own analysis and shared high-level summary findings.<sup>2</sup> Neither WICHE nor AACRAO had access to individual student data or detailed data for independent analysis. Results that were possible to summarize across institutions are shown in the Project Data Summary of the online [Data and Evidence guide](#), for illustration of the patterns in holds usage among these 12 institutions.

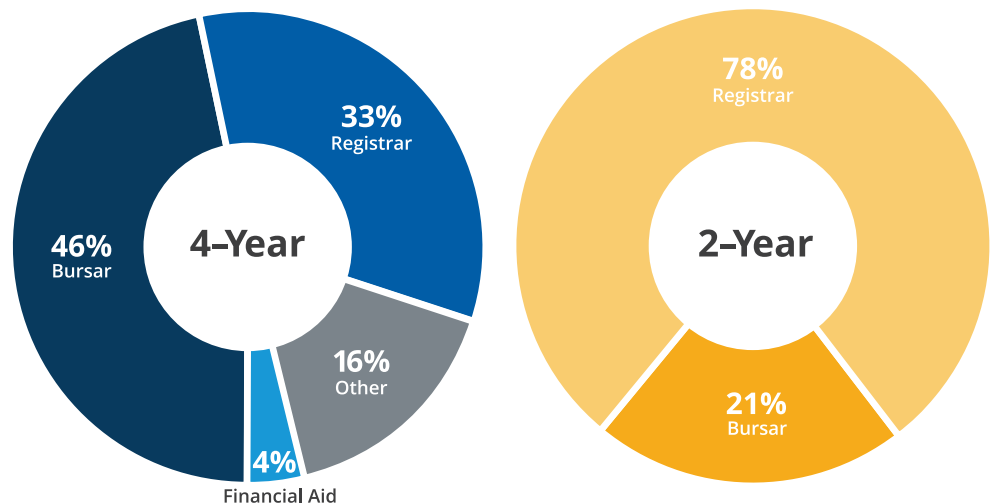
The overall results confirmed that students experienced holds at a rate similar to what previous research characterized as widespread and “nearly ubiquitous.”<sup>3</sup> Selected highlights include:

- ▶ Potentially 250,000 or more holds were placed in total across participating institutions during AY 2021-22, restricting registration, transcripts or diplomas (across 11 of the institutions; 94% were by four-year institutions).<sup>4</sup> By comparison, approximately 120,000 degree-seeking undergraduates were enrolled across these institutions in AY 2021-22. The bursar and registrar’s offices were the most likely ones to initiate holds.
- ▶ 67% of the holds used by these 12 institutions restricted enrollment, or registration for classes, 14% restricted access to a transcript, and 6% restricted both. (An additional 17% of hold types uncovered by the analysis lacked clear enough definition to describe their impact on registration or transcripts.)



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 [Data and Evidence Guide](#).

**Department or Unit Originating Hold**  
*Combined Rate Across Institutions, by Institution Type*

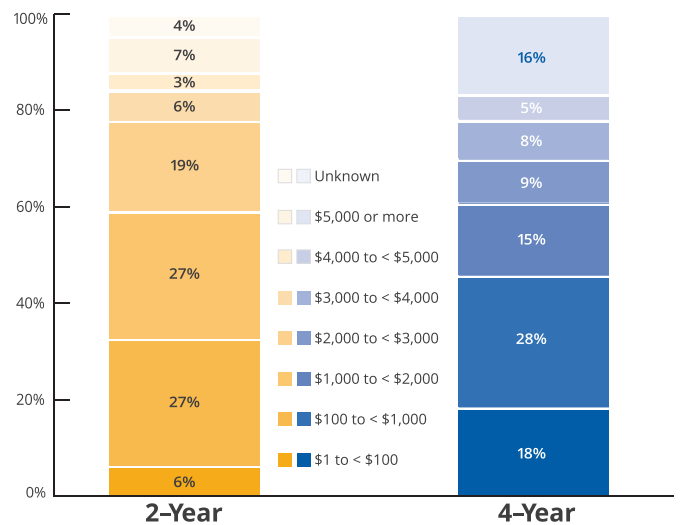


- ▶ Overall, financial or debt holds were resolved for 88% of the 111,300 students who had them (across 10 of the institutions).
- ▶ About 14,000 students had unresolved financial obligations in AY 2021-22, equaling a combined total of \$30.6 million, and the total outstanding balance associated with unresolved debt holds, by institution, ranged from \$72,000 to \$18.1M (across 11 and 10 of the institutions, respectively).
- ▶ The most prevalent unresolved debt amounts were between \$1,000 and \$3,000. For a small percentage of students, the unresolved debt was less than \$100, and the minimum unresolved debt amount for any student ranged from \$1 to \$270, and the maximum ranged from \$4,290 to \$33,600 (across 11 and 10 of the institutions, respectively).

To be clear, these are not statistically representative findings, as they describe only 12 colleges and universities. Deeper analysis conducted for internal use by each institution revealed how standardized analysis and summary masks important contextual and institutional variation. Further, this yearlong project only covered holds usage in the single academic year of 2021-22, limiting research about longer-term impacts. And, importantly, the analysis timeframe overlapped with the COVID-19 pandemic. Institutions were encouraged to consider how factors like enrollment changes and [CARES Act Higher Education Emergency Relief Fund](#) availability may have impacted findings.<sup>5</sup>

Despite their lack of generalizability, the results provided by participants in the No Holding Back project demonstrate compelling evidence of the nature and extent of administrative holds. WICHE intentionally provides the project findings in the institutions' own words throughout the work products of the project, to inform the field through rich narrative detail. Further, the firsthand student perspectives provide additional insight.

**Amount of Financial Obligation Associated With the Unresolved Financial Hold**



Source: WICHE representation from the results shared by 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. May include some imprecision from double-counted registration and transcript holds for a single event, variation in how data were available or were reported, and institutional context.

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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**

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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**

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While each institution conducted data analysis of holds, they each experienced challenges in conducting their studies, including data availability, staff capacity (particularly for less-resourced organizations), and turnover. There was also variation across institutions regarding what information was considered important or compelling for unique institutional priorities. Capacity challenges were mitigated by having a sample data analysis framework to follow and flexibility in quantitative analysis approaches.

# INEQUITY IN ADMINISTRATIVE HOLDS

Holds are commonplace, but inequitably experienced by some students. A key focus of the No Holding Back project was to explore whether holds were experienced differently among students of color and lower-income students. Therefore, each institution analyzed holds resolution among Pell recipients and by race/ethnicity. Overall, across 11 reporting institutions, there was evidence of possible inequity in the holds experience for these student populations in academic year 2021-22.

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

Source: Institutional analysis results from 11 institutions that provided this detail. Note: the study period overlapped the time that [CARES Act Higher Education Emergency Relief Fund](#) was available to students, including those facing financial challenges.

**Pell recipients, Hispanic students (of any race), non-Hispanic American Indian/Alaska Native, Black, and Native Hawai'ian or other Pacific Islander students were less likely than average to resolve their holds within the single year analyzed—both for financial and other types of holds.** However, Pell students were less likely than average to experience financial holds, in the year analyzed.

**All of the institutions found that students experienced and resolved holds at different rates, but variation existed in the nature, extent, and type of student who experienced holds.** Several institutions did not find evidence of an association between student race/ethnicity and hold receipt. Some found that Pell recipients were more likely to resolve a hold than non-Pell recipients.

Beyond these high-level results, individual institutions reported disproportional and potentially inequitable patterns in holds when they expanded their research into more detailed analysis. These institutions found that holds were also experienced and resolved at different rates among:

- ▶ New students (compared to continuing students)
- ▶ First-generation students
- ▶ Part-time students
- ▶ Male students
- ▶ Transfer students
- ▶ International students



In many cases, the institutional findings—and the perspectives shared by students—highlight the need to investigate equity from many angles, including for intersectional student identities and in relation to specific institutional student populations. By following up on data findings through a review of processes and procedures, institutions may discover the inequitable impacts (however inadvertent) of holds usage on certain types of students.

The detailed description of findings from the institutions illuminated the overall findings of possible inequity for students of color and lower-income students, as well as variation by institution:



Overall, 80% of undergraduate students with a financial hold resolved the hold prior to the end of the academic year. Ninety-five percent of new students received at least one hold during their first year (78% if you exclude mandatory first year advising). New students with one or more financial holds persist into the following term at a rate 20 percent lower than their peers. First generation students, new students, part-time students, and students with a less than 3.00 undergraduate term GPA are less likely to resolve their financial hold than their peers. Each financial hold a new student receives in a term reduces their likelihood of persisting into the following term by 45%. The average financial hold amount was \$2,160. Students with unresolved financial holds owed on average \$1,000 more per term than students who resolved their hold.

**PORTLAND STATE UNIVERSITY**



We discovered no evidence of an association between race/ethnicity and having a hold. Pell recipients are more likely to resolve a hold than non-Pell recipients. Men appear less likely to get a hold, but more likely to not resolve the holds. Part-time and full-time students, and traditional and non-traditional students, receive holds at roughly the same rate. But holds to part-time or non-traditional students are less likely to be resolved. And transfer and stop out students carry more debt, are less likely to resolve holds and therefore are associated with more unresolved debt.

**FLATHEAD VALLEY COMMUNITY COLLEGE**





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 \$1,100 more in their hold amount compared to non-Pell eligible students. We continue to explore both of these.

**UNIVERSITY OF ALASKA SOUTHEAST**



Feedback and examples from students can shed light on observed data patterns and provide additional insights that data might not reveal.

For example, WICHE heard from multiple students that the timing of different types of financial aid such as [Veteran's benefits](#) and scholarships resulted in registration holds (this was also acknowledged by several institutions). And registration holds led some students to register for classes outside their required coursework either because the required courses were no longer available when a hold was lifted, or to maintain required enrollment levels.

More examples from the videos and other [materials online](#) reflect possible disconnects between administrative and student perspectives, and illustrate what students believe would improve the student experience of holds. For example:

- ▶ Students experience gaps in what communication they feel they need from institutions, and whether they have relevant, sufficient, or flexible options to fulfill financial obligations or complete the needed administrative tasks to resolve a hold.
- ▶ Students frequently cited not being aware that they had a balance or not comprehending the consequences of it until the moment they were blocked from enrolling in courses or accessing records or services.
- ▶ Students described situations in which greater personal hardships or circumstances overtook the possibility or priority of taking a college administrative action or clearing the hold. Some students with persistent holds experienced them as a compounding factor in a cycle of challenges, including with responsibilities outside of school. In some cases, issues were amplified by a lack of access to needed mental health support.



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**



# POLICIES AND EXTERNAL INFLUENCES

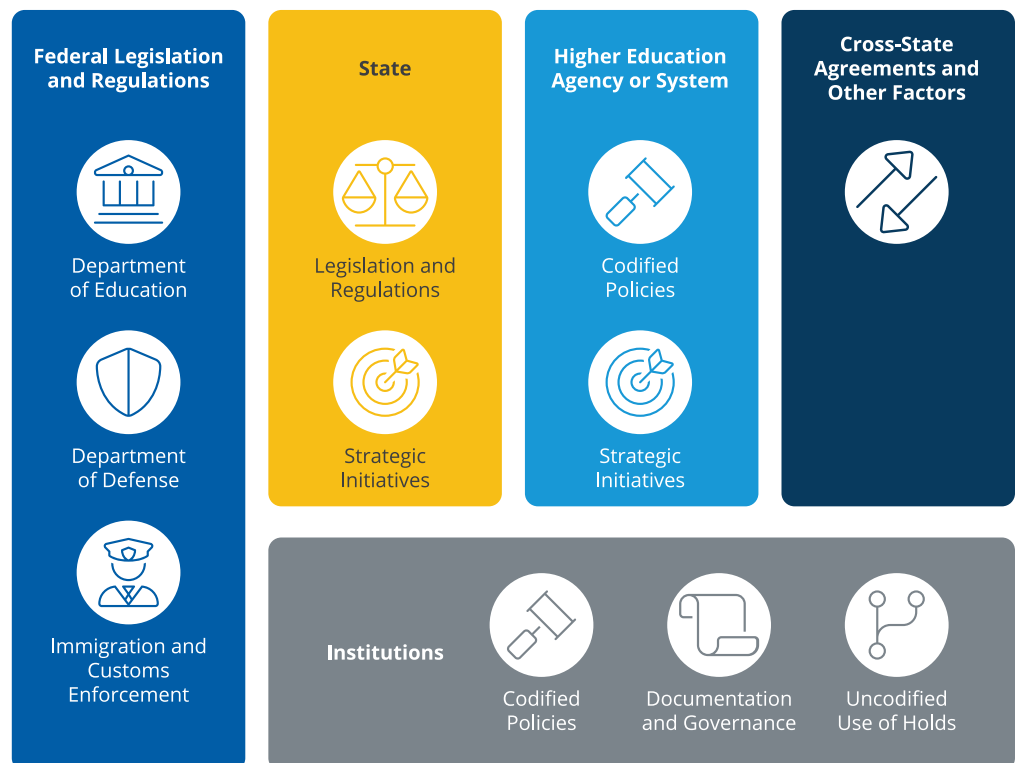
Few policies held institutions back from considering changes to their use of holds. The public colleges and universities in the No Holding Back project identified the types of federal, state, governing system, and other policy and external influences that provide a policy framework for their use of administrative holds. It was outside this project's scope to evaluate or interpret the legal basis of holds or policies that define holds. Rather, the examples provided by institutions are presented with other considerations for undertaking a systematic policy inventory in the [Policy Influences](#) guide.

**Some holds are more directly codified in legislation, regulation, or documented policy at a federal, state or higher education system or agency level.** These codifications were often the basis for cited "policies." At an institutional level, the higher-level policies were typically reflected in the academic and administrative regulations and procedures that are publicized for students.

**Transcript holds were more often (though not always) associated with formal regulations than other hold types.** Key examples of this are recently released final regulations amending Title IV of the Higher Education Act of 1965. As part of certifying institutional eligibility to participate in title IV programs, institutions will be required to provide an official transcript including all the credit or clock hours for payment periods in which the student received title IV funds and for which all institutional charges were paid at the time of the transcript request.<sup>6</sup> Similarly, by the time the No Holding Back project concluded, 10 states had taken definitive legislative action in various ways, to also restrict or limit the use of transcript holds (see also the [Policy Influences Guide](#)).<sup>7</sup>

State debt collection laws and requirements were another cited policy basis for using holds. Such regulations alone might not specifically require an institution to block registration or access to a transcript. However, in combination with a state law, they may be used to prohibit enrollment to a student owing money. For example, regulations from a state or higher education agency or system might mandate or authorize a bar on enrollment of a student who owes money, or access to an official

## Policy Influences on Use of Holds



transcript (these regulations sometimes stipulate certain threshold debt amounts and can apply to enrolled students with a debt as well as those who disengaged from the institution with a balance).<sup>8</sup>

Thus, institutions may be affected by complementary federal or state policies, but sometimes the interrelationship of policies is more complex or overlapping (such as when changes in one policy sphere impact another).

**Sometimes, it was less clear or straightforward whether the policies cited by institutions as reasons for administrative holds, require or necessitate the use of holds.**

For example, students must make satisfactory academic progress (SAP) and are subject to credit minimums and caps to receive federal financial aid and veteran and military tuition assistance.<sup>9</sup> Insufficient progress may result in academic probation at the institution and can lead to downstream effects with other programming that requires academic progress.

“ Higher education state policy makers should review the outcomes of this project to better understand their role in implementing or supporting policies that can affect institutional and student success.

**GREAT BASIN COLLEGE**

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When efficient disbursement of students’ financial aid is at issue or in jeopardy because of lack of academic progress or attention to administrative requirements, institutions may have multiple protective rationales for decisive action:

- ▶ Safeguarding institutional financial interests
- ▶ Complying with relevant with laws or regulations
- ▶ Protecting students’ receipt of due aid that supports their education
- ▶ Guiding students to avoid accumulated debt or impediments to their enrollment

Thus, institutions may have a rationale for restricting a student’s further registration due to insufficient academic progress, even if not strictly mandated by policy to do so.

**Institutions in this project also described how holds may be influenced by other overarching initiatives, such as state completion or transfer campaigns.** In practical terms, the institutions in this project revealed the importance of a systematic inventory of, and an understanding about, the policies, regulations, administrative requirements, and institutional guidance governing holds.

When investigated closely, institutions may find that some holds are determined by codified policies. However, they may also find that many holds reflect institutional decisions about how to administer requirements and processes, which may be based on interpretations, practices developed over time or with little oversight, or institution-centric administrative priorities. From this, institutions may discover where there is discretion in the use of holds, and where there is possibility for improvement.

# IMPROVING PROCESSES AND PRACTICES

The 12 institutions in the No Holding Back Project began work with intentions, readiness and, in several cases, existing momentum for assessing holds usage, which likely contributed to their overall success and progress. Over the course of a year, the institutions engaged in a guided process, as is demonstrated in the online resources resulting from this project.

Because holds exist and support the institution across its many units, the institutions in this project overwhelmingly testified to the importance of collaboration and a comprehensive approach.

► [Engage the perspectives of all relevant stakeholders.](#) The institutions worked in cross-unit and cross-functional institutional teams, which supported identification and agreement on shared complementary outcomes. This collaborative approach supported:

- Dual attention to institutional and financial health and student success
- Identification of reasons and resources to do the work
- Recognition of possible challenges
- Leveraging the strengths and influences of relevant stakeholders when pursuing and implementing changes

In this project, having a community of peers provided opportunities for encouragement, support, shared ideas, examples, check-ins, and accountability for milestones. Outside of a formal community of practice, institutions might pursue opportunities through professional associations, affinity groups, or natural partnerships with other institutions.

► [Use data and evidence.](#) The institutions spoke about the benefits of a comprehensive scan of holds usage. A full review of holds data can reveal both the current and historical situation as well as provide evidence to educate stakeholders and inform where adjustment may be justified. Comprehensive data review also helps to develop a baseline structure for ongoing evaluation.

► [Understand external and environmental influences,](#) including both those that govern or could restrict and those which could support the work.

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For things like this to be effective...there has to be institutional support to move forward with the changes as a result of the holds audit.

**LARAMIE COUNTY COMMUNITY COLLEGE**

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Participating in an administrative holds community of practice had the happy by-product of connecting us with a group of like-minded colleagues in our region to whom we can turn for support and guidance.

**UNIVERSITY OF NEVADA, LAS VEGAS**

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All participating institutions were either planning or beginning to make changes to holds usage within a year of beginning their holds assessments in fall semester of academic year 2022-23, as the project concluded in fall semester of 2023-24. The overall success of the project notwithstanding, this work included some challenges and incomplete successes, such as:

- ▶ A natural resistance to change, both anticipated and encountered (this was shown to be mitigated through mindful stakeholder engagement at the start of the project)
- ▶ Staff turnover that impacted capacity and institutional knowledge, and leadership changes that overlapped with assessment and change efforts
- ▶ As is typical for short-term initiatives, the full impact and success of these change initiatives will become more evident over time.

# NEXT STEPS

The learnings and resources generated by this year-long effort from the participating institutions can be a robust jumping-off point for individual institutions. But it cannot represent the experiences and perspectives of all U.S. higher education institutions and their students, or what could result from a longer-term initiative. Possible further work and research are summarized below.

## USAGE AND IMPACT OF ADMINISTRATIVE HOLDS

The experience of the institutions in this project reaffirmed findings from previous research; confirming that administrative holds are common practice, permeate campus operations, are spread throughout operational units and data systems, and are experienced throughout the student lifecycle. There is wide variability in the reasons for their use and how they are implemented, how institutions might analyze and improve their use, and how students may be differently (and possibly inequitably) impacted by holds.

### **Continued evidence gathering about holds might include:**

- ▶ Exploring variations within different institutional contexts, such as comparing results from community colleges, private institutions, centralized and decentralized governing structures, minority serving institutions, and institutions with less robust informational technology or analysis capacity
- ▶ More student input and evidence
- ▶ Statistically rigorous research and larger-scale studies, including evidence from institutions in states with codified holds requirements or restrictions
- ▶ Focusing on certain student populations, such as traditionally under-represented students, out-of-state and in-state students, and transfer students
- ▶ Analysis that identifies the monetary implications of holds, including the financial rationales for using holds instead of alternative methods, institutional debt loads relative to other institutional finances, and cost-benefit analysis of debt collection yields, alternatives to holds, and student account and debt
- ▶ Quantification of impacts on employment and possible suppression of subsequent postsecondary enrollment

Importantly, the learnings from this project emphasized that hearing from students directly about their experience of holds is as critical for evidence and ideas as the analysis of holds data and processes.

The data systems available to institutions appear to enable a substantial number and range of holds. But these systems might not always automatically provide the capabilities needed for more targeted use of holds, meaningful communication to students, or analysis and monitoring capabilities.

### **Technological innovation or development could include:**

- ▶ Open-source tools (e.g., through R or syntax and modules for common student information systems)
- ▶ Expanded iterations of the analysis worksheet developed for this project
- ▶ Artificial intelligence approaches to analysis and administrative innovation

## STUDENT AND INSTITUTIONAL PERSPECTIVES

The rich detail contributed by the institutions and the students who participated in the project shed additional light on possible disconnects between institution-centric and student-centric approaches to administration. Institutions need to receive payment and work at scale, but usage of holds might be unbalanced between institutional administrative efficiency or preference and student needs.

**Further work in this space might include evidence gathering, experimentation, evaluation, and validation of ‘best practices’.** For example:

- ▶ The alternative mechanisms, approaches, and options institutions might use to administer requirements and procedures and achieve student action and/or payment, other than withholding registration or transcripts
- ▶ Process improvements in the continued use of holds, for example: changes in timing; incremental, flexible, and tailored options for students to complete needed actions or make payment before imposition of a hold; transparent and efficient mechanisms for holds resolution
- ▶ Administering holds in tailored or targeted ways for neutral or positive impact with respect to students’ varying life experiences, circumstances, and trajectories through higher education
- ▶ Overall improvements to communication around administrative requirements, processes, and holds
- ▶ Evidence about the cost-benefit analysis related to current usage of administrative holds, and any adjustments

## POLICY INFLUENCES

Institutions in this project described ways that federal, state, or other codified policies or regulations defined their use of holds. Some of the insightful detail suggested that there can be variation in interpretation and implementation related to codified uses of holds. Further, other overarching factors such as state policy initiatives and goals can influence holds usage. But in many cases, there appeared to be substantial discretion in whether and how institutions use holds, some of which is necessary and beneficial in light of each institution’s unique setting and circumstances.

**Further work in this area might continue to disentangle complex policy and environmental factors involved in institutional hold usage.** The fluctuating legislative and regulatory landscape, and the fact that institutions will need to adjust to recently released new regulations, could provide opportunities to monitor these influences.

- ▶ The direct, indirect, or unintended impacts of a given policy change
- ▶ Data about institutional and student finances as both adjust to changed policies
- ▶ Variation in impacts across institutional settings
- ▶ Possible inter-state impacts related to a change in federal or state policies (e.g., with out-of-state student enrollments, or cross-state transfer)
- ▶ Insights that arise from institutions adapting to a policy change, including alternatives to holds that help institutions stay in compliance with mandates or requirements

Finally, institutions that voluntarily assess and potentially adjust their use of holds can contribute evidence of whether, when and how holds could continue to be a reasonable administrative mechanism, ideally in ways that support both institutional and student success.



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<sup>1</sup> Specifically, this collaborative research was conducted August 2022 to August 2023, and data analysis covered holds that restricted access to registration or official transcripts during academic year 2021-22. Seminal reports on the use of administrative holds include: Kilgore, W. and Sharp, K. (2022). “Stop! Do Not Pass Go! Institutional Practices Impeding Student Advancement: Part 1 An Exploratory Study”. American Association of Collegiate Registrars and Admissions Officers. [https://www.aacrao.org/docs/default-source/research-docs/institutional-practices-impeding-undergrad-student-advancement-\(v8-final\).pdf](https://www.aacrao.org/docs/default-source/research-docs/institutional-practices-impeding-undergrad-student-advancement-(v8-final).pdf). And 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. Ithaka S+R. <https://doi.org/10.18665/sr.313978> and related works at <https://sr.ithaka.org/publications/solving-stranded-credits/>.

<sup>2</sup> 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.

<sup>3</sup> Kilgore and Sharp.

<sup>4</sup> Note: Between 10 and 12 institutions were able to provide results for each of the data points.

<sup>5</sup> U.S. Department of Education Office of Postsecondary Education. Higher Education Emergency Relief Fund-Student Aid. <https://www2.ed.gov/about/offices/list/ope/heerfstudent.html>.

<sup>6</sup> Financial Value Transparency and Gainful Employment (GE), Financial Responsibility, Administrative Capability, Certification Procedures, Ability to Benefit (ATB). Office of Postsecondary Education, Department of Education, Final Regulations. 88 Fed. Reg. 74568 (2023, October 31). <https://www.govinfo.gov/content/pkg/FR-2023-10-31/pdf/2023-22785.pdf>. Note: these regulatory amendments also state that an institution may not withhold official transcripts related to a balance owed as a result of institutional error or misconduct.

<sup>7</sup> 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/>.

<sup>8</sup> For example, Nevada System of Higher Education. (2023, June). Title 4-Codifications of Board Policy Statements, Section 2. Delinquent Accounts. Board of Regents Handbook. <https://nshe.nevada.edu/wp-content/uploads/file/BoardOfRegents/Handbook/title4/T4-CH17%20Fees%20and%20Expenses.pdf>. And Montana Board of Regents of Higher Education. (1999, Nov. 18). Policy 940.21 – Withholding registration, transcripts and diplomas from students owing debts. Policy and Procedures Manual. <https://mus.edu/borpol/bor900/940-21.pdf>.

<sup>9</sup> For example, U.S. Department of Education Federal Financial Aid Office. Financial Aid Eligibility: Staying Eligible. <https://studentaid.gov/understand-aid/eligibility/staying-eligible>. And U.S. Department of Veterans Affairs. About GI Bill Benefits. <https://www.va.gov/education/about-gi-bill-benefits/>.

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