

# Student Records Access for Success

## Closed Schools, Transcript Holds, and the Future of Learner Records

Recent Actions, Issues and Resources at the Accreditor,  
Institutional, State and National Levels

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## Key Points

- Students seek access to their records for many reasons related to their intents for educational success and new policies and practices are being put into place by higher education policymakers and practitioners to support that success.
- Student record and transcript hold regulations and policies have been significantly altered over the past few years by actions at the federal, state, and institutional levels.
- From an accreditor perspective, institutions are encouraged to review their policies and practices related to student records access and transcript holds for impediments to student success.
- Regional compacts are advocating for, and devising solutions related to student records that promote student success at the institutional and state levels.
- Institutions have developed plans for transcript holds and financial balances that help students complete their educational plans.

## Introduction

Student records, and specifically academic transcripts, are the traditional record of a student's completed coursework and their earned credential at an educational institution. Transcripts can serve as proof and a signal to potential employers and other educational institutions that a student has engaged in certain learning activities and obtained knowledge in given areas. Though it might seem like a transcript is only of critical importance to an individual, such records are also of great importance to many others who have students' and broader interests in mind.

Early in 2021, staff members from HLC, the U.S. Department of Education and the regional compacts — the Midwestern Higher Education Compact (MHEC), the New England Board of Higher Education (NEBHE), and the Western Interstate Commission for Higher Education (WICHE) — met to discuss students' access to their records as a matter of student success. Three concerns were identified: student access to transcripts when there are financial or administrative holds placed on student accounts at institutions; access to student records when an institution closes; and the future of student records access.

HLC and the regional compacts have continued to discuss and study the topic of transcript holds and closed

school records. The issues surrounding transcript holds and closed school records have received ever greater attention in light of supporting student success since the pandemic. Because of the many ways the pandemic caused a re-thinking of business as usual, changes to transcript holds became a policy and process initiative at the federal, state, and institutional levels.

The definition of student success for this paper includes enrolling in and completing a postsecondary education, transferring between institutions, earning licensure, securing employment, qualifying for military service, and other scenarios that vary by student.

This paper provides an overview of student records issues, from an accreditor and regional compacts perspective. It includes recent legislative and policy actions at the federal and state levels as well as practitioner solutions and tools for institutions created by regional compacts, institutions, and other organizations. Resources are provided for those working at the institutional level as well as at the state or federal policy level to help students succeed.

## An Accreditor's Perspective

HLC's mission is to advance the common good through quality assurance of higher education as the leader in equitable, transformative, and trusted accreditation in the service of students and member institutions. HLC is also recognized by the U.S. Department of Education as a link to federal student financial aid.

Part of being a trusted accreditor of colleges and universities across the United States is providing transparent information directly to students and other stakeholders regarding HLC's requirements for accreditation and how to navigate the vast information available regarding higher education.

Students often contact HLC regarding the barriers to their educational success from holds on or blocked access to student records. HLC requirements are written to be non-prescriptive, assuring the mission-reflective approach at accredited institutions.

Regarding transcripts, HLC [Assumed Practices](#) state:

A.10. The institution remains in compliance at all times with all applicable laws, including laws related to authorization of educational activities and consumer protection wherever it does business.

B.3.b. The institution maintains timely and accurate transcript and records services.

D.7. The institution's planning activities demonstrate careful and detailed consideration of student needs (including but not limited to the preservation of student records) and protocols to be followed in the event an orderly institutional closure becomes necessary.

If an institution fails to do those things, a student or other stakeholder can file a complaint with HLC for further review.

When a student contacts HLC to try to obtain his or her transcript because a hold has been placed on their account, HLC cannot intervene to cause the institution to release the hold. HLC will refer the student to an appropriate contact at the institution to discuss the transcript hold policy and processes. Such contacts may include an ombudsperson, registrar, or bursar.

Students also contact HLC when an institution has permanently closed and they need assistance to obtain their record. HLC is not the custodian of student records, and will refer students to the closed record process for their institution or the state higher education agency.

In an effort to protect students, HLC collaborates with closing institutions and state agencies to provide accurate and detailed information to students about how to obtain their records. HLC provides information for the public on its member institutions in the Directory of Institutions. Institutions that are currently accredited have a Statement of Accreditation Status (SAS) there with details about their relationship with HLC.

As part of Federal Compliance, an institution at the risk of closure provides HLC a Provisional Plan for Teach-Out Arrangements. The Provisional Plans include a record retention plan that is to be provided to all enrolled students and delineates the final disposition of student records such as transcripts, billing, and financial aid records ([HLC Approval of Institutional Teach-Out Arrangements FDCR.B.10.010](#)).

Further, HLC convened a panel of national experts to develop a [Teach-Out Toolkit](#) to assist closing institutions and receiving institutions with resources and recommendations, some specifically related to institutional processes that involve securing, handling, storing, ordering, and communicating about transcripts during a teach-out. *It includes the recommendation to consider the release of all academic and financial holds prior to closure.*

In an effort to promote student success, HLC encourages its accredited institutions to consider how its transcript policies and practices are timely and accurate, including in the cases of transcript holds and during teach outs. HLC also encourages institutions to stay abreast of the rapidly evolving legislative, policy, and practice environment concerning student records unfolding across the country.

## States & Regional Compacts Solutions

At the state level, academic transcripts are a concern for many reasons. First, both historically and contemporaneously, the possession of credentials and degrees confers upon individuals certain rights and responsibilities, formal and informal. Second, trustworthy documentation of credentials and degrees facilitate the flow of qualified individuals through the educational system, into the workplace, and into licensed professions, thereby sustaining the social and economic viability of the state. Third, the state has an interest in creating and maintaining a transcribing ecosystem that is less chaotic and fraught with vulnerabilities, especially in an era of declining student populations and increasing institutional closures and consolidations.

Many states have taken legislative action regarding transcript access and holds with bills introduced in at least 18 states since 2019, with 12 of them being enacted into law. (See [Select State Legislation on Transcript Withholding Bans](#), pg. 9.) Not surprisingly, only two of these bills were introduced before the pandemic with every other one coming out in rapid succession during and after the height of the pandemic. Ostensibly, the goal of these bills has been to help more students complete their education and/or get jobs. The bills have come from both Republican- and Democratic-led states. Most of the bills ban transcript holds for financial reasons, or debt, with some variation as to under what conditions.

The pace of these types of bills being introduced has slowed significantly since the beginning of 2023 with the last one researched as part of this paper becoming effective on January 1, 2024. It remains to be seen if any new bills banning transcript withholding will be introduced considering two things: the end of the pandemic, and recent actions by the federal government. (See pg. 6.)

## Removing Barriers to Student Progress

In the Northeast, the New England Board of Higher Education (NEBHE) has focused on the issue of “holds” as an opportunity to increase credential completion and boost enrollment for institutions. NEBHE has gathered with state legislators who have been working on this topic and continue to engage with fellow regional compacts and HLC to stay abreast of developments and best practices across the United States. Also, NEBHE has addressed this topic at regional and national conferences and observed momentum in the goal of finding a way forward for students who are otherwise making progress, but for whom a relatively small financial impediment is the difference between continued enrollment and stopping out.

Ithaca S+R<sup>1</sup> found that of the millions of students with “stranded credits” (credit earned, no credential, and a financial balance due) the average amount owed is \$2,300, with an average under \$650 for community college students. With a looming enrollment cliff and current low confidence in postsecondary education, institutions that adjust their approach on this issue are likely to support more students to credential completion and, ultimately, further education or employment.

While there are understandable concerns for institutions and states in collecting debts owed to them by students, the need and opportunities created by credential completion supports consideration for solutions. This issue has garnered national attention in recent years precisely because it arises at the intersection of three legitimate and high stakes areas of social, governmental, and educational concern.

While the attention, state legislation, and now, a national policy are helpful, much of it has focused on transcript withholding (especially for employment verification — an important issue) as opposed to encouraging and allowing continued enrollment or helping students emerge from their education with less debt. In many ways, individual institutions and postsecondary systems are better positioned to develop and implement innovative practices that address a broader range of issues faced by students who currently owe debts to an institution (or the institution’s state) they once attended. The recent Ohio College Comeback Compact<sup>2</sup> (see pg. 6) is a model for how institutions can work with each other and their state to help students with a debt to a school or the state.

This approach provides a win for various stakeholders. Institutions benefit due to increased enrollment, revenue, and, ideally, increased graduation rates. The state benefits from residents with additional education and a completed credential participating in the labor market. And students benefit from continuing and completing their associate or bachelor’s degree and reducing their education-related debts.

- What other creative approaches might an institution or system take?
- For students who are making progress, especially when their academic records are strong, might there be scholarships or grants that can be directly applied to existing debts (without need for applications and waiting periods)?
- Could student financial profiles be proactively reviewed by the registrar or enrollment services office to directly share aid options the student may not have accessed?
- What can be done before a student can no longer enroll, understanding it can be hard to get them back and hard for the student to come back?

A recent study<sup>3</sup> found the most aggressive debt collection practices yielded a limited return. Therefore, approaching this issue from a success and completion vantage point is likely to encourage more students to complete a credential and generate more revenue and debt clearance for institutions than the practice of simply placing holds on student accounts.

With the recognized benefits and values of student success and completion, it is in the best interest of all institutions and systems to take a careful look at their hold practices, identify and consider existing models for adoption, and follow the momentum for goals shared by institutions, systems, states, and regions.

## Putting Toolkits into Practice

In the West and the Pacific, the Western Interstate Commission for Higher Education (WICHE) is increasing the understanding of the use of holds that restrict registration or access to official transcripts as a means to get college student action or payment and providing tools to undertake change.

With the goal of harmonizing both student and institutional needs, [WICHE](#) has created a suite of practical [tools](#) to guide institutions’ assessments of their registration and transcript holds. Based on the experiences of [12 institutions](#), these resources bring possible [issues and opportunities](#) with holds to light. The variety of

tools — including institutional examples, data from institutions and students, a data analysis protocol for common student information systems, and other content — make this information relevant and accessible for most campuses.

Among other things, WICHE [advises](#) institutions to use this moment in time, in which they must revisit [transcript withholding](#) and debt collection procedures due to state and federal actions, as an opportunity to look more broadly at whether registration holds might be contributing or predictive factors in student cycles of debt accumulation and unenrollment.

One example of note, which WICHE heard from numerous [students](#), is that registration holds disadvantage them in competing for needed courses, leading them to enroll in unnecessary classes to maintain full enrollment. In some cases, these hold delays might arise from mismatched aid and registration cycles. Students suggested increased flexibility in payments and processing deadlines and mechanics, retroactive rather than preemptive registration blocks, and better information and access to the personnel needed to avoid or resolve holds.

These situations and findings 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 that surfaced in this year-long participatory research project. However, these resources do not exhaustively address all possible settings and WICHE will look for ways to research and replicate this important work and identify activities that could be characterized as “best practices.”

## Future-Forward Learner Records

Across the Midwest, the Midwestern Higher Education Compact (MHEC) has worked to improve the quality and availability of academic transcripts for more than a decade. By negotiating contracts with vendors of electronic transcript services for [credentialing solutions](#)<sup>4</sup>, MHEC has made it easier and less costly for institutions across the nation to use electronic transcripts to provide secure, interoperable, and efficient information to institutions and employers about students’ academic accomplishments. In most cases, such transcripts are composed of XML data that can be transmitted quickly and securely from the institution the student attended to another institution or a prospective employer.

In recent years, and especially since the pandemic, students, institutions, and employers have rapidly become more comfortable [accessing and exchanging information digitally](#)<sup>5</sup> making the continued use of paper or PDF transcripts even more outdated and inconvenient. In addition, the [proliferation of alternative credentials](#)<sup>6</sup> has created an increased need for records of individual learning that far exceed the capacity of traditional transcripts, even those in digital form. Students and workers today need a way to [document and share](#)<sup>7</sup> their myriad learning experiences and accomplishments to convince others of their readiness to undertake new educational or professional opportunities.

Technologies to support the creation and proliferation of a more comprehensive learner record (CLR) have flourished alongside the evolving ability for individuals to own and control such a record while its third party integrity and veracity are maintained via [blockchain technology](#).<sup>8</sup> Increasingly, institutions are embracing and offering students ways to document and chronicle their learning experiences in digital credential wallets, portfolios, and other platforms that move in the direction of a truly comprehensive learner record. The [American Association of Collegiate Registrars and Admissions Officers \(AACRAO\)](#)<sup>9</sup> and [EDUCAUSE](#)<sup>10</sup> have long championed and encouraged the development of comprehensive learner records and other forms of digital credentialing.

Fully electronic, digital learner records do all that traditional transcripts accomplished in the past and hold the potential to support and facilitate major transitions occurring in the higher education landscape. For example, in the unfortunate case of [institutional closures](#),<sup>11</sup> electronic learner records can be much more easily retained, transferred for custodial reasons, transferred for academic reasons, and made available for students to use in multiple ways. Also, [learner records](#)<sup>12</sup> that are controlled by students, rather than by institutions, allow students to refine and update their record and add elements to them that did not originate at any given institution. Thus, the recognition of life-long learning, credit for prior experiences, micro- and alternative credentials from multiple organizations, and notions of competency-based skills demonstrated can be maintained in the record, too. Finally, [digital learner records](#)<sup>13</sup> harbor the potential to strengthen the relationship between postsecondary education and the workforce as it becomes easier for employers to understand the paths, experiences, and abilities that comprise an individual’s readiness to take on a new job.

With so many important opportunities riding on the accuracy, validity, and richness of a learner's records, states will continue to have a vested interest in them. As an organization serving its member states, MHEC will continue its work with educators, technology experts, and service vendors to optimize opportunities for organizations to create meaningful, sustainable learner records for the benefit of all.

## Federal Government & National Actions

In the federal government and at the national level, transcript holds have come under greater scrutiny as a practice that often limits rather than enhances student success. This greater attention has led to some new ways of doing business at the institutional, state, regional, and national levels.

At the end of 2021, U.S. Secretary of Education Miguel Cardona framed the issue and set the tone for action, encouraging that, "...institutional leaders must embrace long-term change. That means evaluating long-standing institutional policies that block retention and completion for our most underserved students, such as enrollment and transcript holds for students with unpaid balances."<sup>14</sup> The Secretary's comments came at a time when many institutions and students were still adjusting to a post-pandemic world and receiving federal COVID relief and recovery funds.

In April of 2022, AACRAO and the National Association of College & University Business Officers (NACUBO) issued a statement on the practice. In the [Use of Administrative-Process and Student Success-Related Holds](#) the organizations state that, "However effective institutional holds may be, there is room for improvement. An examination of practice reveals institutional policies regarding holds, the reason they are imposed, how the student is notified and the content of that notification — in terms of resolution actions — are often vague and unclear. A resulting hold becomes a stop sign rather than a yield sign."

Then in September of the same year, the Consumer Protection Financial Bureau, a federal agency, issued [Supervisory Highlights Student Loan Servicing Special Edition](#) (Issue 27, Fall 2022) and stated that, "...supervision determined that blanket policies to withhold transcripts in connection with an extension of credit are abusive under the Consumer Financial Protection Act and directed institutional lenders to cease this practice."

In October 2022, in the [Joint Statement by Higher Education Associations on Importance of Clear, Fair Transcript Withholding Policies](#), the American Council on Education and several higher education associations urged institutions "to have a clear understanding of institutional policies regarding transcript and enrollment holds, and be prepared to explain how they determined these policies to be effective and fair."

Fast forward to fall 2023, and the U.S. Department of Education weighed in via its regulatory revision process for Title IV student aid programs, also known as negotiated rulemaking, on the use of transcript holds for outstanding debt, in [Financial Responsibility, Administrative Capability, Certification Procedures, Ability to Benefit \(ATB\)](#). Under 34 CFR § 668.14(b)(33) and (34) relating to an institution's Program Participation Agreement (PPA) for Title IV student financial aid, the federal government limits the use of transcript holds for student debts except for payment terms when a student did not receive Title IV aid; or, did not pay all charges for a payment period and did not have a payment plan in place with the institution for a payment period at the time of the transcript request for a term when they did receive Title IV aid.

With the new regulations, national organizations like AACRAO have provided guidance to institutions by conducting a [webinar](#) and providing its [presentation slide deck](#) as a resource.

The national landscape for transcript holds has changed significantly in a very short amount of time and institutions will surely have more questions as the real-life scenarios related to transcript hold practices play out on campuses throughout the country. Institutions are encouraged to connect with their compliance officers and national associations for further guidance.

## Colleges Collaborate, Students Complete

According to the Ohio Department of Higher Education, "approximately 1.5 million Ohioans have some college, but no degree (or credential) [which] presents a critical challenge to maximizing the economic opportunity for that individual as well as for the greater good of the State of Ohio's economy."

To address these concerns, Ohio institutions have [developed](#) debt forgiveness programs as well as two regional collaboratives to get more students who stopped-out to return to college and complete their degrees while increasing enrollments.

One of them, the Ohio College Comeback Compact (the Compact) is a collaborative state model of eight postsecondary institutions. The Compact offers debt forgiveness and transcript release to students with a debt to a former institution or the Ohio Attorney General's Office. Eligible students are those who have earned credits at one of the eight institutions but have not yet earned a credential. The program gives students the opportunity to re-enroll at any of the eight schools and, after successfully completing one semester, they can have up to \$5,000 of institutional or state debt forgiven.

This approach benefits institutions with increased enrollment, revenue and, ideally, increased graduation rates. The state benefits from an improved labor market and economy. The students benefit from completing their associate or bachelor's degrees, reducing their education-related debt, and becoming more employable.

The Compact was piloted during the fall 2022 semester and is the first program of its kind in Ohio. As the program has evolved, changes have been implemented to better serve students, such as the reduction of enrollment steps and processing time as well as identifying more ways to contact the students.

In addition to the Compact, Cuyahoga Community College (Tri-C) offers additional debt forgiveness programs — the Tri-C College Comeback Program and the Cuyahoga County Debt Repayment Program — which provide one-time payments toward debt forgiveness. These programs also assist students who are ineligible for the Compact.

Students participating in the program shared their stories:

*Nicole said she wanted to return to nursing, but she was unable to enter her program after failing the testing by just two points. She still had to pay for the semester but couldn't afford it at the time. She was also struggling with family issues.*

*Toccarra has a career already but said she wants to finish what she started.*

*Valerie said she has the characteristics to be successful in college, such as time management and good listening skills. She is learning not to take things for granted and to stop thinking she is too old to return and complete her education.*

*Wendy said she had changed her major to one that was more manageable but withdrew from courses due to life circumstances.*

The Compact has the potential to become a blueprint for other institutions. If other institutions are considering a similar approach, Tri-C suggests:

- Ensuring staff members are available in all student support service areas to make students aware of the program and how it works.
- Triple-checking student data for errors with phone numbers, addresses, major, and other information.
- Creating innovative alternatives to help students offset tuition costs.
- Creating an internal and external FAQ to address the needs of students and staff.
- Developing a communication plan with a variety of outreach methods.
- Consulting with external vendors to connect with students via email, phone, text, social media, and other methods.

As higher education continues to face challenges, institutions will have to continue to find innovative ways to help bolster harder cases when it comes to completion. States and their institutions are stepping up to solve the problem of “some college, no degree” by focusing on removing small barriers that yield big results.

## Conclusion

The rapidly changing student records landscape presents more opportunities for students to obtain and access their transcripts.

As an accreditor, HLC will continue to monitor, study, and communicate with members about issues that affect student success outcomes.

The regional compacts will continue to serve as a link to states and promote issues that increase institutional and student success.

Finally, because of new state and federal laws and regulations, institutions will have to examine their policies on transcript holds and come up with innovative practices to help students succeed.

# Resources

## Closed School Student Records

- **American Association of Collegiate Registrars and Admissions Officers (AACRAO)**  
[Closed or Merged Institutions Guidance and Best Practices Pertaining to Student Education Records \(October 5, 2020\)](#)
- **Higher Learning Commission (HLC)**  
[Teach-Out Toolkit: An HLC Quality Awareness Initiative \(November 2020\)](#)
- **Illinois Board of Higher Education (IBHE)**  
[A State Perspective on Consumer Protection in the Changing Higher Education Landscape: Practical Steps and Recommendations in Cases of Institutional Closure \(Sept. 2019\)](#)
- **National Council for State Authorization Reciprocity Agreements (NC-SARA)**  
[State Authorization Guide \(2024\)](#)

## Comprehensive and Digital Learner Records

- **Midwestern Higher Education Compact (MHEC)**  
[Digital Credentialing Solutions \(June 2020\)](#)

## Transcript Withholding and Stranded Credits

- **AACRAO and the National Association of College and University Business Officers (NACUBO)**  
[To Hold or Not to Hold? That is the Question \(November 17, 2023\)](#)
- **Institute for Higher Education Policy (IHEP)**  
[Reengagement Investment Calculator: Making the Business Case for Student Success \(2019\)](#)
- **Ithaka S+R**  
[Transcript Withholding Blog Posts, Briefs, Events, and Reports](#)
- **Ohio College Comeback Compact**  
[Ohio College Comeback Compact](#)
- **Western Interstate Commission for Higher Education (WICHE)**  
[Tools for Assessing Administrative Holds \(October 2023\)](#)



## Select State Legislation on Transcript Withholding Bans

State	Effective Date	Summary
California	10/4/2019	<a href="#">AB1313</a> Prohibits institutions to (a) Refuse to provide a transcript for a current or former student on the grounds that the student owes a debt. (b) Condition the provision of a transcript on the payment of a debt, other than a fee charged to provide the transcript. (c) Charge a higher fee for obtaining a transcript or provide less favorable treatment of a transcript request because a student owes a debt. (d) Use transcript issuance as a tool for debt collection.
Colorado	4/21/2022	<a href="#">HB22-1049</a> Adds 23-5-113.5 to statute, which prohibits the withholding of official transcripts based upon debt owed to institutions, conditioning or having a higher fee other than base official transcript fees, using transcript issuance as a tool for debt collection. This bill also grants current and former students a civil right of action of \$500 per violation.
Connecticut	7/1/2022	<a href="#">SB17</a> Prohibits an institution from withholding transcripts for any enrolled or formerly enrolled student. It would further restrict that an institution condition the release on the payment of the debt, charging a higher fee to a student holding an institutional debt, or issuing the transcript as a method of collecting on a debt. During committee consideration, an amendment was offered that streamlines the originally drafted language and modifies the restriction of withholding a transcript only when a student requests it for employment purposes.
Illinois	5/27/2022	<a href="#">SB3032</a> Bans institutions from withholding or charging a higher fee than the base fee of processing official or unofficial transcripts on the ground that the student owes a debt. This bill also requires institutions to provide official transcripts to provide official transcripts to former and current students and potential employers regardless of debt status,
Indiana	4/20/2023	<a href="#">SB404</a> Bans colleges and universities from withholding a transcript if a student paid between \$100-\$300 toward their debt within the past year, depending on the amount owed.
Louisiana	N/A	<a href="#">HB183</a> Would have required postsecondary education management boards to adopt the following policy. Under current Louisiana law, public postsecondary education management boards may adopt policies to prohibit the institutions under their supervision from withholding student transcripts and other records due to outstanding debt or defaulting on a loan.
Maine	8/1/2022	<a href="#">LD 1838</a> Prohibits institutions from withholding transcripts to current and former students on 2-year programs with less than \$500 in debt and 4-year programs with less than \$2,500 in debt owed to the institution. Students who owe more than these amounts can gain access to transcript upon entering into a repayment plan with the institution.
Maryland	7/1/2023	<a href="#">SB0248</a> Prohibits institutions of higher education from refusing to provide a transcript to a student because the student owes a debt, condition the issuance of a transcript on the payment of debt, charge a higher fee for obtaining a transcript due to debt owed, or use a transcript issuance as a tool for debt collection.

State	Effective Date	Summary
Massachusetts	N/A	<a href="#">S821</a> , <a href="#">S.667</a> , <a href="#">S.738</a> , <a href="#">H.1277</a> Would have created statute that institutions of higher education shall not withhold a student's academic transcripts solely due to that student's failure to pay any loan payments, fines, fees, tuition, or other expenses owed to the institution, except that a student's academic credits and grades may be withheld for any course for which that student's tuition and mandatory course fees are not paid in full.
Minnesota	6/27/2021	<p><a href="#">Minnesota Laws 2021, 1st Special Session, Chapter 2, Article 2, Sec. 44. Transcript Access</a></p> <p>Subd. 2. Prohibited practices. A school must not:</p> <p>(1) refuse to provide a transcript for a current or former student because the student owes a debt to the school if:</p> <ul style="list-style-type: none"> <li>(i) the debt owed is less than \$250;</li> <li>(ii) the student has entered into and, as determined by the institution, is in compliance with a payment plan with the school;</li> <li>(iii) the transcript request is made by a prospective employer for the student; or</li> <li>(iv) the school has sent the debt for repayment to the Department of Revenue or to a collection agency, as defined in section 332.31, subdivision 3, external to the institution; or</li> </ul> <p>(2) charge an additional or a higher fee for obtaining a transcript or provide less favorable treatment of a transcript request because a student owes a debt to the originating school.</p> <p>Subd. 3. Institutional policy.</p> <ul style="list-style-type: none"> <li>(a) Institutions that use transcript issuance as a tool for debt collection must have a policy accessible to students that outlines how the institution collects on debts owed to the institution.</li> <li>(b) Institutions shall seek to use transcript issuance as a tool for debt collection for the fewest number of cases possible.</li> </ul>
Missouri	N/A	<a href="#">HB1789</a> Would have prohibited institutions of higher education from refusing to provide a transcript to a student based on a condition of any debt or charge a higher fee for a transcript because a student owes a debt.
New Jersey	N/A	<a href="#">A6008</a> , <a href="#">A1198 Aca (1R)</a> Would have prohibited institutions of higher education and certain proprietary institutions from withholding transcripts due to outstanding balances on student accounts.
New York	6/03/2022	<p><a href="#">A6938B</a> Added Art 13-C §640, Ed L to state statute, prohibiting institutions from engaging in the following actions:</p> <ul style="list-style-type: none"> <li>(a) withholding a transcript because a student owes a debt to such institution or school;</li> <li>(b) conditioning the provision of a transcript on a student's payment of a debt to such institution or school; or</li> <li>(c) charging a higher fee or providing less favorable treatment of a transcript request because a student owes a debt to such institution or school, provided however, that an institution or school may charge a fee for the issuance of a transcript.</li> </ul>
Ohio	10/3/2023	<a href="#">§3345.027</a> and <a href="#">§3345.60</a> of the Ohio Revised Code prohibits institutions from withholding official transcripts from students when the use is related to obtaining employment, or on behalf of a potential employer, because of debt owed to the institution.

State	Effective Date	Summary
Oregon	1/1/2024	<p><a href="#">SB 424</a> Prohibits postsecondary institutions to</p> <ul style="list-style-type: none"> <li>(a) refuse to provide a transcript for a current or former student because the student owes a debt to the institution;</li> <li>(b) charge a higher fee for obtaining a transcript to a current or former student because the student owes a debt to the institution; or</li> <li>(c) use the issuance of a transcript as a tool for debt collection.</li> </ul> <p>Additionally, this statute requires institutions to report on the institution’s policy and procedures on phasing out transcript holds.</p>
Rhode Island	N/A	<p><a href="#">H 7061</a> Would have created statute that institutions of higher education shall not withhold a student’s academic transcripts solely due to that student’s failure to pay any loan payments, fines, fees, tuition, or other expenses owed to the institution, except that a student’s academic credits and grades may be withheld for any course for which that student’s tuition and mandatory course fees are not paid in full.</p>
Virginia	N/A	<p><a href="#">SB 1110</a> Would have prohibited public institutions of higher education to condition access to academic transcripts if they are requested for the purposes of applying for employment or joining the armed forces. Institutions would also have been prohibited from conditionally providing transcripts if the current or former student’s debt was less than \$500 or has been enrolled in a payment plan with three consecutive monthly payments. This bill also would have required institutions to post notice on the purposes and conditions dictating provisions of academic transcripts.</p>
Washington	6/11/2020	<p><a href="#">RCW 28B.10.293</a> Created from <a href="#">HB 2513</a> states that institutions are not allowed to withhold official transcripts due to a debt owed to the institution when the transcript is used for any of the following instances: job applications, transferring to another institution, applying for financial aid, pursuit of opportunities in the military or national guard; or pursuit of other postsecondary opportunities. Additionally, institutions of higher education may not do any of the following for the purposes of debt collection, unless the debts are related to nonpayment of tuition fees, room and board fees, or financial aid funds owed:</p> <ul style="list-style-type: none"> <li>(a) refuse to provide an official transcript for a current or former student on the grounds that the student owes a debt;</li> <li>(b) condition the provision of an official transcript on the payment of the debt, other than a fee charged to provide the official transcript;</li> <li>(c) charge a higher fee for obtaining the official transcript, or provide less than favorable treatment of an official transcript request because a student owes a debt; or</li> <li>(d) use transcript issuance as a tool for debt collection.</li> </ul>

Chart credit: Jonathan McNicholes, *Stakeholder Engagement and Convening Assistant Manager*,  
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