



# TO HOLD OR NOT TO HOLD?: PART 3 THAT IS THE QUESTION

**AACRAO Guidance and a Discussion with the Department  
of Education**

**In response to Changes to the Code of Federal Regulations  
at 668.14(b)**

**AACRAO webinar  
June 5th, 2029**





# OBJECTIVES

- Briefly share AACRAO's guidance
- Engage in a Q&A with the Department of Education





# DEFINITIONS

## PARTIAL-TRANSCRIPT HOLDS VS. PARTIAL TRANSCRIPTS

**Partial-transcript holds** refer to the practice of suppressing certain information from a learner's transcript, such as:

- Final grades for a specific term
- An earned credential
- The entire content of a term, including course subject, course number, course title, and final grades





# DEFINITIONS

## PARTIAL-TRANSCRIPT HOLDS VS. PARTIAL TRANSCRIPTS

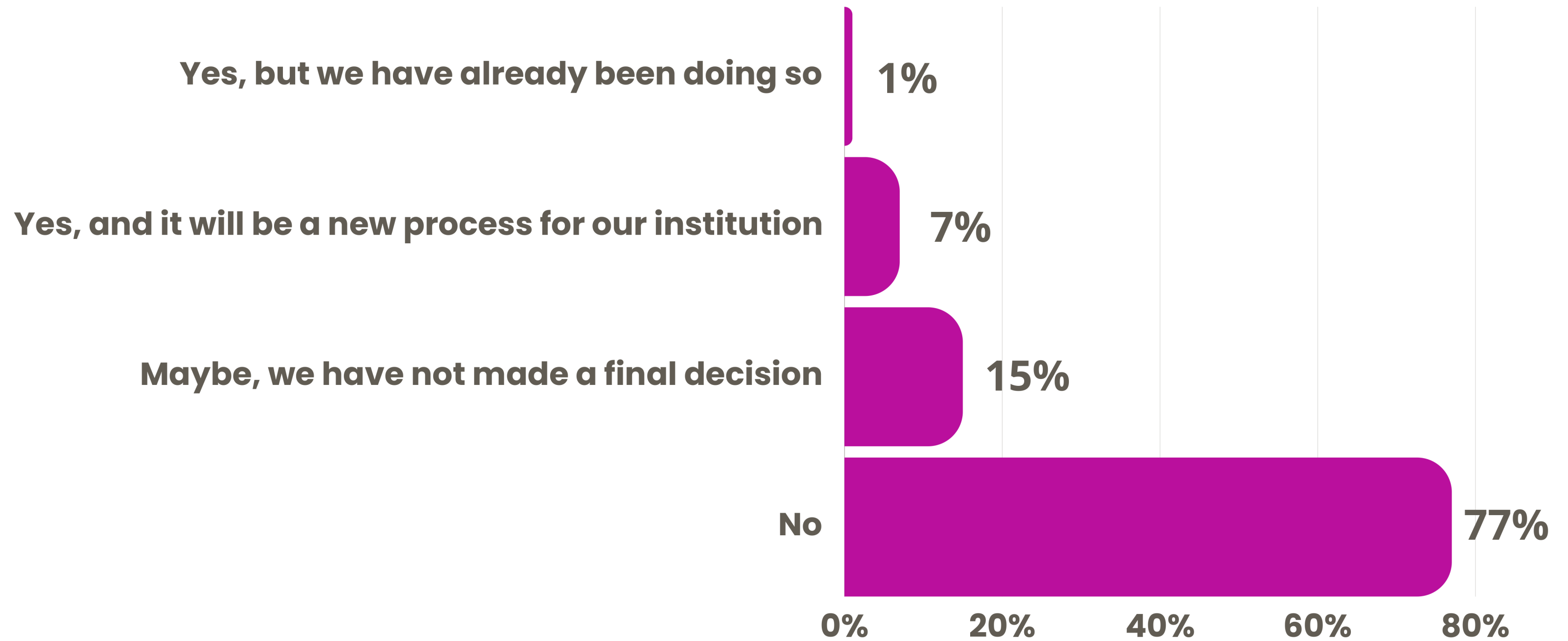
**Partial transcripts**, on the other hand, refer to an institution's practice of allowing a learner to release only a portion of their academic history. For example:

- A learner who has both graduate and undergraduate academic history at an institution may choose to release only their undergraduate history or only their graduate history.





# Plans to Use Partial-Transcript Holds\*







# **AACRAO Guidance on Partial- Transcript Holds**

Given that the regulation addresses payment periods rather than the entire transcript, this leaves permission for institutions to use partial-transcript holds.





# **AACRAO Guidance on Partial- Transcript Holds**

AACRAO takes the position that completed and in progress courses should be visible on the transcript, with the understanding that certain administrative procedures may result in a suppression of the final grade for the course (e.g., course graded as incomplete, in-progress courses, academic renewal or forgiveness).





# **AACRAO Guidance on Partial- Transcript Holds**

If a partial-transcript hold is to be used as allowed by the regulation, we believe any practice and policy related to the use of partial-transcript holds should treat all learners equally.



# **AACRAO Guidance on Partial- Transcript Holds**

We strongly support using standardized practices for using partial-transcript holds, akin to the standardization of transcript practices for other processes such as when a learner earns a grade of incomplete and for courses still in progress.





# **AACRAO Guidance on Partial- Transcript Holds**

Before proceeding with using partial-transcript holds, review any state regulations regarding the use of transcript holds.

Currently, the Department of Education has not provided guidance on how to handle situations where federal regulations conflict with state regulations.



# **AACRAO Guidance on Partial- Transcript Holds**

The recommendations are aimed at creating a process that is similar to the transcript practices currently used by most institutions for incomplete grades and/or courses in progress.





# AACRAO Guidance on Partial- Transcript Holds

- Create a new grade code that indicates that the grade is withheld for an outstanding balance or an administrative reason
- Ensure this grade code does not get included in any grade, credit, term or cumulative total calculations
- Include all applicable courses on the transcript for the payment period in question



# **AACRAO Guidance on Transcript Annotation**

Neither the regulation nor the Dear Colleague letter provide any guidance on the practice of transcript annotation.

Absent any guidance from the Department of Education on this topic, it is recommended that an institution seek legal counsel before deciding whether or not to pursue this practice.