

TRANSCRIPTS

Ohio Business College maintains an individual progress record for each student. Transcripts, official and unofficial, are available to current students at any time. Upon graduation, each graduate receives one official and one unofficial copy of his or her transcript at no charge. Additional official transcripts are available upon written request at a charge of \$5.00 each. Beginning July 1, 2024, OBC must provide a student with an official transcript if they received Title IV, HEA funds for a payment period and all charges have been paid for the period the transcript is being requested. OBC is not required to include credits on the transcript for periods where the student received non-Title IV funds unless the student has fully paid OBC the charges or does not have a signed agreement to pay.

TRANSCRIPT WITHHOLDING (TW) POLICY

34 CFR 668.14(b)(33) prevents institutions from withholding transcripts or taking any negative action against a student for balances owed due to school error. 34 CFR 668.14(b)(34) prevents institutions from withholding transcripts for any credits funded, in whole or in part, with Title IV funds.

TW-Q1: The regulations under 34 CFR 668.14(b)(34) provide that an institution must provide an official transcript that includes all the credit or clock hours for payment periods in which a student received Title IV funds and for which all institutional charges were paid or included in an agreement to pay at the time the request is made. Does this mean that there are some cases in which a school is required to provide a student with an official transcript, but the transcript may not include all classes that the student completed if the student has not fully paid for them?

TW-A1: Yes. A school is required to release an official transcript to a student that includes all the credits or clock hours for payment periods in which the student received Title IV, HEA program funds as long as all institutional charges were paid or included in an agreement to pay at the time the request is made. In other words, the institution must provide a student with an official transcript if they received Title IV, HEA funds for a payment period and all charges have been paid for that period. However, the school is not required to include on that transcript credits for periods where a student received non-Title IV funds, unless the student has fully paid the institutional charges, or credits where a student received Title IV funds and has not paid all the institutional charges (and does not have a signed agreement to pay).

TW-Q2: Schools must transcript credits for periods where students have entered into “an agreement to pay at the time the request [for the transcript] is made.” What does “an agreement to pay” mean? Does this refer to a payment plan?

TW-A2: For purposes of determining whether a student is entitled to an official transcript that includes credits earned for a particular payment period, a school must consider a student to have fully paid for a payment period if an institutional payment plan has been established by the student, or on the student's behalf, to cover the charges and the responsible individual is current on the plan (i.e., has not missed any payments). An institution's policy on payment plans needs to be consistent for all students, including a student who is interested in an agreement to pay their outstanding balance in return for their transcript. An institution is permitted to wait for the student to make their first payment from their agreement before providing them with their transcript.

TW-Q3: What happens when a student is on a payment agreement but does not pay or has missed payments?

TW-A3: There is nothing that prevents an institution from choosing not to transcript credits for periods where the student has not paid for all the institutional charges associated with the credits they have earned, except when such charges are covered by a payment plan. In this case, the Department does not impose restrictions on an institution's ability to withhold transcripts or transcript credits from payment periods in which the student has not received title IV, HEA funds or has not paid for all institutional charges. The institution would still be required to provide a transcript with the credits from all other payment periods in which the student has received title IV, HEA funds and has paid for all institutional charges.

TW-Q4: Are schools ever required to provide a student with their degree or other recognized credential if they owe a balance to the institution?

TW-A4: No. The regulations only require institutions to provide a student with an official transcript that includes all the credits that the student earned for periods in which the student received Title IV funds and for which all institutional charges were paid (or were included in an agreement to pay). The regulations never require an institution to confer a degree or other credential to a student who has not fully paid the amount they owe to the school (unless the institution made an error in its administration of Title IV funds, in which case 34 CFR 668.14(b)(33) applies).

TW-Q5: What is meant by a partial transcript release?

TW-A5: The regulation refers to transcript holds related to individual payment periods where a balance is owed. If a student has not paid for all the institutional charges associated with the credits they have earned an institution may withhold specific transcript credits from payment periods in which the student has not paid for all institutional charges. The Department notes that rather than issuing a partial transcript, an institution may choose to provide a student with a full transcript, including credits from payment periods in which the student has not paid for all institutional charges.

TW-Q6: Why is the regulation focused on only releasing certain portions of the transcript, not the whole transcript?

TW-A6: The regulation is focused on individual payment periods where Title IV or other HEA program funds were used to pay for the payment period and balance is still owed. As stated in the final rule, the Department believes that it does not have the authority to prevent an institution from withholding transcripts in circumstances where the student does not receive title IV, HEA funds, or in cases where the student has not paid for all the institutional charges associated with the credits they have earned. In those cases, the Department does not impose restrictions on an institution's ability to withhold transcripts or transcript credits from payment periods in which the student has not received title IV, HEA funds or has not paid for all institutional charges.

TW-Q7: Can a college hold a transcript if a borrower defaults on a Federal Perkins or Nursing loan?

TW-A7: A loan default is separate from owing a Title IV balance and these regulations do not address students defaulting on loans.

TW-Q8: What if failure to return equipment results in a debt after a certain amount of time?

TW-A8: If the rental is considered an allowable institutional charge and the late return results in a debt, all institutional charges will not have been paid for that payment period. For purposes of these new provisions, we consider an institutional charge to be “for a payment period” if they are allowable charges for the payment period, as defined under § 668.164(c)(1).

TW-Q9: Does this regulation apply to transcript holds only after July 1, 2024, or is it retroactive?

TW-A9: Institutions must apply the requirements of this regulation to all students beginning July 1, 2024, even if the balance owed is attributable to payment periods prior to July 1, 2024.

TW-Q10: How will the Department enforce requirements related to transcript withholding? Can institutions appeal a determination made by the Department?

TW-A10: The Department will enforce these requirements through its normal oversight procedures, including audits and program reviews. Institutions have an opportunity to appeal determinations of non-compliance in accordance with normal appeal procedures