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2022 JOINT STATEMENT ABOUT THE USE OF ADMINISTRATIVE-PROCESS AND STUDENT-SUCCESS-RELATED HOLDS

Background and Rationale

It can be difficult to get the attention of a college student. Professors can always connect with students in class. However, advisors and administrators have few means to command attention, especially if calling, texting, emailing or using the postal service aren't successful.

The ability to use holds to prompt a student to take an action is one of the few resources in an institution's toolkit that supports student success and addresses the administrative needs of an institution. This is why the use of holds is ubiquitous in higher education.

Student-success-related holds are designed to motivate a student to take an action to help the student stay enrolled, to earn credential-applicable credits or to complete the educational credential sought. These holds typically keep students from registering until they meet with an academic advisor or another academic-success-focused person on campus.

Administrative-process holds are designed to motivate a student to complete a task, such as paying a bill, turning in missing documents or meeting other administrative requirements. Both student-success-related holds and administrative-process holds may stop registration, access to an official transcript or both simultaneously; this varies by institutional practice and policy.

The use of holds serves both students and institutions. For example, not being able to place an administrative hold after routine billing practices have failed to resolve a debt leaves the institution with few avenues to collect funds. Referring the debt to a collection agency is a step institution would prefer not to take. It is the instrument of last resort for most institutions because doing so may leave a current or former student with a damaged credit rating in addition to owing more money, due to interest added and debt-servicing fees.

Recent data indicate holds work well. When a hold is placed, students are motivated to take the action sought, and the hold is resolved.

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.

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Given the information above, we believe the following.

- 1. Institutions should be allowed to use administrative-process holds and student-success holds within the guidelines below. Eliminating the ability to do so may cause harm to students.
- 2. Administrative-process holds should not be tied to trivial or minor debt compared to the overall fees already paid to the institution by the student.

It is with these beliefs in mind that we establish the following policy-and-practice guidelines.

Institutional Practice-and-Policy Guidelines

General guidance on the use of student-success and administrative-process holds

- Limit the use of holds to areas in which the practice has been proved to produce the desired outcome.
- Maintain a process to manage the creation of holds.
- Regularly monitor and review the use of holds.
- Maintain clear, concise, timely and multichannel communication with students about the existence of a hold, including the reason for the hold, the impact of the hold, how to resolve the hold and whom to speak to about the hold.
- Routinely examine the use and impact of holds on students for issues of equity within the student population, the average time to resolution and average unpaid debt, if applicable.
- Allow a student to appeal the inability to register for the subsequent term, if a hold prevents registration.

Guidance on the use of holds tied to an unpaid balance

- Administrative-process-hold use should not be tied to trivial or minor debt, compared to the overall fees already paid to the institution by the student.
- Consider establishing a payment-plan option for current students with outstanding balances and allow for the release of an official transcript, as long as the plan is current.
- Maintain a debt-forgiveness program for nominal debts, where allowed by law.
- Allow a student to access an unofficial transcript, even with a hold in place.
- Allow a student to appeal the ability to send an official transcript to another institution to which he or she intends to transfer, or to a prospective employer or professional licensing agency.
- Allow a student to appeal the inability to register for the subsequent term, if a hold prevents registration due to an unpaid debt.

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Signatory

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In this context, a "hold" is a mechanism an institution employs to encourage a student to complete an action sought by the institution. Holds are differentiated by intent and consequences.

²https://www.aacrao.org/research-publications/aacrao-research/institutional-practices-impeding-undergraduate-student-advancement-report;

³Payment plans may only be viable for students who have not already separated from the institution.

⁴FERPA requires an institution to provide the student the opportunity to "inspect and review" any education record, including transcripts maintained by the institution. It does not generally require an institution provide a copy of the record unless that is the only way access can be provided.