

Transcript Withholding FAQs (Updated July 2024):

If there is a payment plan in place, can an institution hold a transcript?

The regulation states that if Title IV funds were received for the payment period in question, the transcript must be released. In Montana, transcripts will no longer be held regardless of whether a payment plan is in place.

Can we release only a partial transcript?

No. While the regulation does allow for institutions to release partial transcripts, many MUS institutions do not have the capacity to reliably track and determine which part of a transcript should be released and/or do not have the capability to provide a partial transcript.

Does this regulation and guidance apply to transcript holds only after July 1, 2024, or is it retroactive?

While the Department of Education has not released answers to timing specifically, Montana will choose to release all transcripts regardless of when the student attends or when the hold was placed.

Can we include information on a transcript that indicates that a balance is due to the institution?

Not at this time. The regulation does not currently address transcript notations. As more information is released, OCHE may provide additional guidance.

When can an institution use other negative actions to try and recover the balance owed by the Title IV recipient?

The Department of Education indicated in the regulation, “we have limited the applicability of the regulation that prevents institutions from taking ‘any negative action’ to only occasions where the balance owed is the result of institutional error, fraud, or misconduct.”

What is the definition of institutional error?

The Department of Education has not released a shared definition for, or examples of, institutional error.

Does this directive include transcripts for students in dual enrollment courses?

Yes. Transcripts for students in dual enrollment courses will not be held due to unpaid balances.

Does this directive apply to transcript holds only after July 1, 2024, or is it retroactive?

Yes. 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.

Does this directive apply to international students?

As international students are not eligible for Title IV aid, campuses may use their own discretion when determining whether to release a transcript.

Helpful Sources: [https://www.aacrao.org/docs/default-source/advocacy-docs/aacrao-response-to-proposed-trascript-withholding-regs.pdf?sfvrsn=fce27394_0#:~:text=The%20language%20in%2068.14\(b,fraud%20or%20misconduct%20by%20the](https://www.aacrao.org/docs/default-source/advocacy-docs/aacrao-response-to-proposed-trascript-withholding-regs.pdf?sfvrsn=fce27394_0#:~:text=The%20language%20in%2068.14(b,fraud%20or%20misconduct%20by%20the)