

Withholding Higher Education:

How Current Transcript Policies at Texas Colleges Derail Educational Aspirations and Job Opportunities for Texans



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TABLE OF CONTENTS

Executive Summary	1
Introduction	2
Background	3
The Flaws in Transcript Withholding	3
Transcript Withholding Bans and Bills	4
Federal Policy	4
Transcript Withholding in Texas: Data Analysis	5
Methodology	5
Overview of Debt Resulting in Transcript Holds	5
The Impact on Former Students	7
Racial Disparities Among Those Impacted by Transcript Withholding	10
Age of Debt: Most Debts Resulting in Transcript Holds are More Than Five Years Old	11
Categories of Debt	12
Conclusion	13
Appendix: Debt by Race	14
Blinn College	14
Dallas College	15
Northeast Texas Community College	16
San Jacinto Community College	17
South Plains College	18
Victoria College	19

EXECUTIVE SUMMARY

The Texas Education Code permits higher education institutions to withhold the release of an individual's college transcript if they have an unpaid debt to the institution. This policy has proven to be ineffective at collecting debt, with only an estimated seven cents on the dollar collected.¹ However, this policy is highly effective in creating barriers for Texans. College transcripts are essential for individuals wishing to further their education or obtain employment.

Texas Appleseed analyzed data from six community colleges across the state to gain insight on how withholding college transcripts impacts Texans. We determined that there are nearly 55,000 outstanding debts preventing individuals from accessing their college transcript from the six schools sampled. The average amount of debt was \$583. Additionally, we found that:

- most debts belong to individuals no longer enrolled in the institution,
- transcript withholding policies disproportionately harm Black students, and
- most debts are more than five years old.

The practice of withholding transcripts harms Texans and the Texas economy. Texas should ban this practice and ensure that individuals have access to their college transcripts, and therefore their future.

Policy Recommendations:

1. Texas should prohibit higher education institutions from placing holds on students' transcripts for unpaid debt. Students only use transcripts for their advancement and transcript holds are not effective at collecting institutional debt.
2. Absent a total ban on transcript withholding, requiring data reporting would provide added insight into the problem in Texas and would inform future policy solutions.

Helpful data would include:

- a. the total number of individuals with debts preventing the release of a transcript;
- b. the total number of debts resulting in a transcript hold, disaggregated by the type of debt, amount of debt, date the debt triggered the hold, enrollment status of the student, and amount the student has paid toward the debt;
- c. clarity on the category of debt, especially which debts were incurred following Return to Title IV (the process of disbursed federal financial aid funds being returned to the federal government following a change in a student's enrollment status);
- d. the total amount of past-due debt collected;
- e. payment plans available for individuals who wish to settle a debt and obtain their transcript;
- f. the total number of individuals whose debts to higher education institutions have been sent to collection and the amount of debt collected through those means; and
- g. a narrative explanation of other administrative policies that affect individuals with debts.

¹ Lederman, D. (2022, June 21). Scrutiny Grows for Withholding Transcripts to Collect Student Debt. Inside Higher Ed. <https://www.insidehighered.com/news/2022/06/21/scrutiny-grows-withholding-transcripts-collect-student-debt>

INTRODUCTION

Building an educated workforce is important for Texas to be economically competitive. College and university policies to withhold transcripts for past due debts undermine our state's competitiveness and are out of line with recent policy changes in Texas and nationally. This study examines transcript hold policies and their harmful impacts on educational attainment in Texas. It offers insights to inform policy reforms that benefit both individuals and our state as a whole.

Texas lags behind many other states in educational attainment. In 2022, only 33.9% of Texans aged 25 or older held a bachelor's degree or higher,² ranking Texas 27th among all states.³ By 2036, it is estimated that 70% of Texas jobs will require education or training beyond high school.⁴ Educational attainment benefits both individuals and the economy as a whole. Texans who hold a bachelor's degree earn 42.5% more than individuals who hold an associate degree, and 67.9% more than high school graduates with no further education.⁵

Recognizing the need to promote an educated workforce and increase the standard of living for all Texans, the Texas Legislature has passed multiple policies in recent years aimed at helping students excel in college and transition into the workforce.

In 2019, the state legislature passed SB 37,⁶ which prevents Texas agencies from denying, suspending, or revoking a borrower's occupational license due to defaulting on their student loans. During the 2023 state legislative session, the legislature passed HB 8,⁷ which allocates \$683 million in the state budget to community colleges using an outcomes-based approach.⁸ Funds are awarded to schools based on students completing a degree or certificate, transferring to a four-year institution, or enrolling high school students in dual-credit courses.⁹

Through legislative action, Texas has shown its commitment to promoting higher education and ensuring Texans can use their education to enter the workforce. Eliminating transcript withholding as a practice would build on existing reforms to open pathways and remove barriers to higher education and employment. It would enable students who suspended their pursuit of higher education to continue their studies and build on the academic work they completed, creating a win for Texans and the Texas economy.

2 Korhonen, V. (2023, November 9). U.S. Educational Attainment in Texas 2022. Statista. <https://www.statista.com/statistics/306995/educational-attainment-texas/#:~:text=U.S.%20educational%20attainment%20in%20Texas%202022&text=In%202022%2C%20about%2021.6%20percent,their%20highest%20level%20of%20education>.

3 Herrig, A. (2023, January 10). Ranking the Most, Least Educated States. Madison Courier. https://www.madisoncourier.com/ranking-the-most-least-educated-states/article_d81dbf6a-b043-5f94-8205-6d35766189aa.html

4 Texas 2036. (n.d.). Transformative Changes at Community Colleges. <https://texas2036.org/posts/transformative-changes-at-community-colleges/>

5 Bureau of Labor Statistics. (n.d.). More education: Lower unemployment, higher earnings [Handout]. <https://www.bls.gov/emp/education-pays-handout.pdf>

6 S.B. 37, 86th Legis. Assemb., 2019 Reg. Sess. (Tex. 2019). <https://capitol.texas.gov/BillLookup/History.aspx?LegSess=86R&Bill=SB37>

7 H.B. 8, 88th Legis. Assemb., 2023 Reg. Sess. (Tex. 2023). <https://capitol.texas.gov/tlodocs/88R/billtext/pdf/HB00008F.pdf#navpanes=0>

8 Texas Higher Education Coordinating Board. (2023, June 9). Texas House Bill 8 Becomes Law, Paves Way for Innovative Community College Funding.

9 Dey, S. (2024, January 2). Texas community colleges get money from state based on performance, not just enrollment. The Texas Tribune. <https://www.texastribune.org/2024/01/02/texas-community-colleges-funding/#:~:text=Texas%20community%20colleges%20get%20money,1980%20to%2026%25%20in%202020/>

BACKGROUND

College transcripts are important for college graduates, enrolled students, and individuals who take a break during their education. Many employers request a copy of transcripts from job applicants. Students transferring from one institution to another must provide a transcript. For individuals who withdraw from a higher education institution and wish to return to college, a transcript is necessary if they wish to obtain academic credit for completed courses. Blocking access to transcripts creates barriers to educational attainment, employment, and earning potential.

The Texas Education Code permits institutions of higher education to withhold a student's transcript for outstanding debt owed to the institution.¹⁰ Specific policies vary from institution to institution, creating a confusing system for students to navigate and access their transcript.

The Flaws in Transcript Withholding

The practice of withholding transcripts as a means of debt collection has proven ineffective, and in some cases, abusive. In September 2022, the Consumer Financial Protection Bureau (CFPB) found that blanket policies to withhold transcripts in connection with an extension of credit are abusive under the Consumer Financial Protection Act.¹¹ The CFPB found that many institutions refused to release transcripts even after those impacted by the hold entered a payment plan. The practice was deemed abusive as it takes “unreasonable advantage of the inability of a consumer to protect the interests of the consumer in selecting or using a consumer financial product or service.”¹² Further, the CFPB highlighted:

“Institutions took unreasonable advantage of the critical importance of official transcripts and institutions’ relationship with consumers. Since many students will need official transcripts at some point to pursue employment or future higher education opportunities, the consequences of withheld transcripts are often disproportionate to the underlying debt amount.”¹³

The CFPB focused on school-based extensions of credit, because of its jurisdictional limits. The underlying analysis, however, that transcript holds are disproportionately punitive in relation to the debts that schools seek to recover, is applicable to any form of school-based debt.

Not only can transcript withholding be abusive, but it also has proven to be an ineffective means to collect debt. Previous research estimates that less than seven cents on the dollar are collected on debts that have been outstanding for a year or more.¹⁴ While transcript withholding is ineffective at collecting debt, it is effective at holding Texans back from building skills, transferring to other higher education institutions, and entering the workforce. Maintaining this policy hurts the Texas economy and undermines efforts to build a trained workforce.

¹⁰ Texas Education Code. (1983). Higher Education. § 132.062.

¹¹ Consumer Financial Protection Bureau. (2022). CFPB Student Loan Servicing Supervisory Highlights Special Edition Report 2022-09. https://files.consumerfinance.gov/f/documents/cfpb_student-loan-servicing-supervisory-highlights-special-edition_report_2022-09.pdf

¹² Ibid.

¹³ Ibid.

¹⁴ Lederman, D. (2022, June 21). Scrutiny Grows for Withholding Transcripts to Collect Student Debt. Inside Higher Ed. <https://www.insidehighered.com/news/2022/06/21/scrutiny-grows-withholding-transcripts-collect-student-debt>

Transcript Withholding Bans and Bills

As of November 2023, eleven states have implemented policy that bans, or partially bans, transcript withholding including New York, California, Colorado, Maine, Maryland, Minnesota, Washington, Illinois, Indiana, Connecticut, and Oregon.¹⁵ Additionally, seven states have introduced bills regarding banning or limiting this practice, including Louisiana, Virginia, New Jersey, Massachusetts, Missouri, Oklahoma, and Rhode Island. Similar bills have been filed in Texas since 2019, but none have been successful to date.¹⁶

Federal Policy

In October 2023, the U.S. Department of Education adopted new rules to limit transcript withholding due to unpaid debts. The rules go into effect on July 1, 2024, and will prevent institutions from withholding transcripts for terms¹⁷ in which the student received federal financial aid, also referred to as Title IV funds, and the balance was paid in full.¹⁸

These new federal rules are a big step forward in ensuring that transcripts are accessible. However, they do not ban the practice of transcript withholding. While institutions will no longer be permitted to withhold the release of credits earned during terms in which the student received Title IV funding and their balance was paid in full, they may still withhold credits earned during terms in which the student did not receive federal financial aid or a balance remains. Further, the federal policy does not cover schools that do not receive Title IV funding.

15 Conroy, E. (2023, November 11). New Rules Mean Millions of Students Can Prove They Went to College. Forbes. <https://www.forbes.com/sites/edwardconroy/2023/11/11/new-rules-mean-millions-of-students-can-prove-they-went-to-college/?sh=7d5ef9f84aa2>

16 In 2019, Texas Representative Diego Bernal introduced HB 271. The bill would have required post-secondary institutions to release transcripts to individuals with debt at their request if they meet any of the following conditions: they have not been enrolled for at least five years, they include with the request a copy of a job posting for which they wish to apply, or they intend to enroll in another postsecondary institution. See: H.B. 271, 86th Legis. Assemb., 2019 Reg. Sess. (Tex. 2019). <https://capitol.texas.gov/tlodocs/86R/billtext/html/HB00271.htm>

17 A term refers to a portion of the academic year in which an educational institution holds classes.

18 U.S. Department of Education. (2023, October 21). Financial Responsibility, Administrative Capability, Certification Procedures, Ability To Benefit (ATB). Federal Register, 34 CFR 668.14(b)(34), 74568-74710. <https://www.federalregister.gov/documents/2023/10/31/2023-22785/financial-responsibility-administrative-capability-certification-procedures-ability-to-benefit-atb#p-1860>

TRANSCRIPT WITHHOLDING IN TEXAS: DATA ANALYSIS

In order to better understand the impacts of transcript withholding in Texas, Texas Appleseed obtained data from six community colleges. The data that we¹⁹ received showed nearly 55,000 outstanding debts preventing individuals from accessing their college transcript from these six schools alone. The average amount of debt was \$583 and the median amount was about \$395. Additionally, we found that:

- most debts belong to individuals no longer enrolled in the institution,
- transcript withholding policies disproportionately harm Black students, and
- most debts are more than five years old.

Methodology

In order to obtain data about student debts that result in transcript withholding, in July 2023, we sent requests for data under the Public Information Act²⁰ to six community colleges and six universities across Texas. This analysis focuses on the six community colleges we sampled. We excluded the universities from this report due to challenges in receiving responsive data.

Our sample of colleges includes a mix of educational institutions with high and low enrollment and schools in rural and urban settings. The six community colleges analyzed in this report are Blinn College, Dallas College, Northeast Texas Community College, San Jacinto College, South Plains College, and Victoria College.

The public information requests asked for data related to institutional policies regarding transcript holds, aggregate amounts of unpaid debt leading to a transcript hold for current and former students, disaggregate data for each individual debt leading to a transcript hold by a unique identifier, enrollment status of students with applicable debts, the date the hold was placed, student race/ethnicity, student gender, and amount of debt paid. The data received from each school varied, and in many cases, our data request was only partially fulfilled.

Our analysis in this report provides an overview of the total number of debts and the total amount of debt from all six colleges combined. We analyzed data broken down by each college for the following categories: descriptive statistics, debt by enrollment status, the racial make-up of individuals impacted by transcript holds, the categories of debts, and the percentage of debts that are five years or older. Data received was inconsistent across schools; thus, some schools are excluded in certain sections.²¹ We used Stata and Microsoft Excel to analyze the data and the results are shown below.

Overview of Debt Resulting in Transcript Holds

Texas Education Code allows institutions to withhold transcripts if students or individuals owe a debt to the institution. However, details of how hold policies are implemented are left to each institution's discretion. In response to our data request, Dallas College revealed that their policy is to withhold a transcript only if the debt is \$250 or greater.²² All other colleges included in this analysis indicated that any amount of debt results in a transcript hold. Dallas College's policy attests to the fact that institutions could, and in our view should, adjust their policies.

¹⁹ For purposes of this report, "we" refers to Texas Appleseed.

²⁰ Texas Government Code Ann. §§ 552.001-.353 (1993).

²¹ An explanation for exclusion is explained in each section when applicable.

²² We excluded all debts from analysis that were less than \$250 for Dallas College.

Table 1 outlines the total number of debts and the total amount of debt held by each college.

Table 1: Overview of Debt

College	Number of Debts Held	Amount of Total Debt
Blinn College	17,023	\$9,037,912
Dallas College	4,120	\$3,469,271
Northeast Texas Community College	4,024	\$1,944,559
San Jacinto College	10,286	\$6,953,300
South Plains College	7,947	\$6,424,616
Victoria College	11,453	\$4,119,396
Total	54,853	\$31,949,055

There were 54,853 debts totaling \$31,949,055, meaning that the average debt was \$583.

We calculated the following for each school: average amount of each debt, median amount of each debt, percent of debts less than \$500, and percent of debts less than \$100. This is summarized in Table 2.

Table 2: Descriptive Breakdown of Debts

College	Average Debt	Median Debt	Percent of Debts Less Than \$500	Percent of Debts Less Than \$100
Blinn College	\$531	\$150	68.2%	44.2%
Dallas College	\$842	\$677	34.1%	n/a
Northeast Texas Community College	\$483	\$266	68.4%	28.9%
San Jacinto College	\$676	\$446	54.6%	13.1%
South Plains College	\$808	\$600	43.3%	7.8%
Victoria College	\$360	\$229	75.5%	29.3%
Average*	-	\$395	57.4%	24.7%

* The average presented in this table is the average of the median values and percentages provided by colleges. The average of the mean is excluded as the average of all debts was calculated based on total debts and total amount of debt above.

We calculated the median debt for each college which is \$395 on average. Based on the average of the percent of debts less than \$500 that result in a transcript hold from each college, we estimate that over half, or 57.4% of all debts, are less than \$500. A \$500 debt is likely substantial enough to be a barrier for

individuals to access their transcript and return to school or further their education. Institutions that choose to withhold a transcript for a \$500 debt create a substantial barrier for individuals to pursue their educational aspirations, increase their earning potential, and have the means to pay back their debt.²³

The Impact on Former Students

We analyzed debts held by enrollment status and the total amount of debt by enrollment status to gain a picture of which population is most impacted by transcript hold policies. ‘Former students’ refers to any student not currently enrolled but does not determine whether the student graduated, transferred, or withdrew from the college.

Debts Disaggregated by Enrollment Status: Current and Former Students

We found that former students hold both most of the debts and the highest amount of debt. Debts held by enrollment status are summarized in Table 3 and Figure 1.

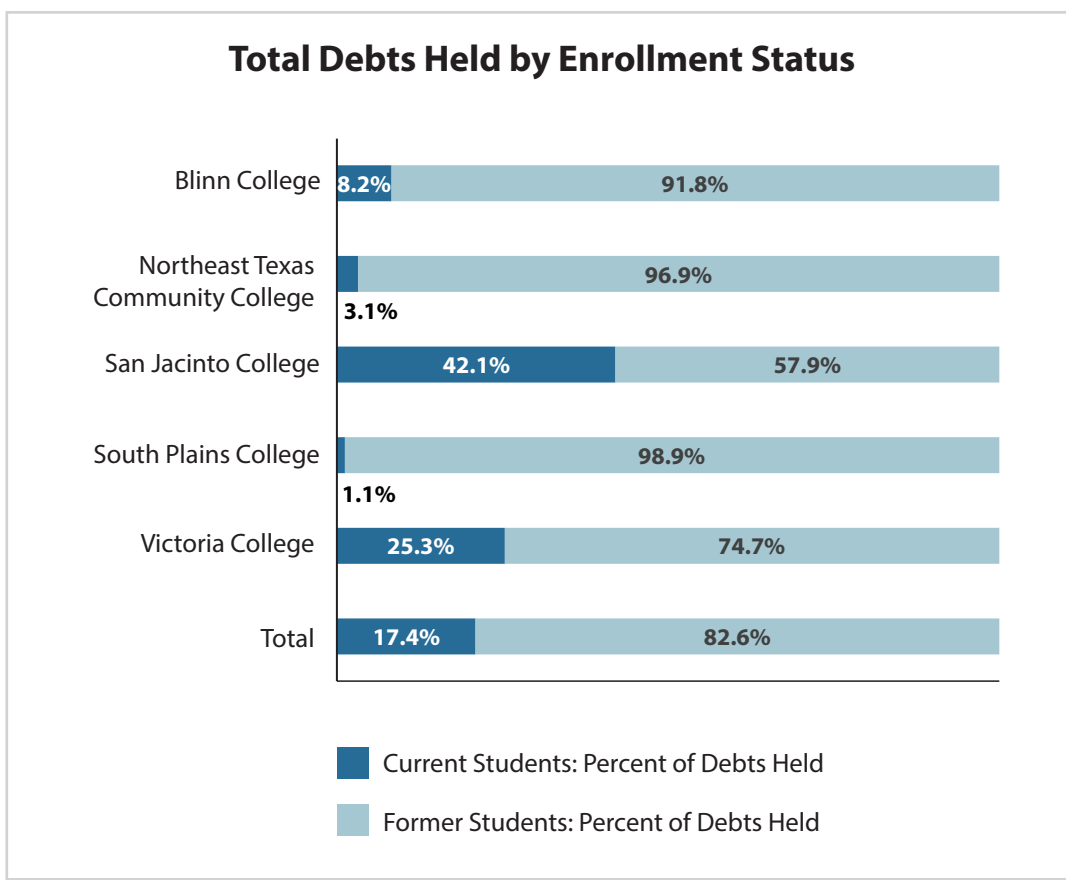
Table 3: Number of Debts Held by Enrollment Status²⁴

College	Current Students: Debts Held	Former Students: Debts Held	Current Students: Percent of Debts Held	Former Students: Percent of Debts Held
Blinn College	1,393	15,630	8.2%	91.8%
Northeast Texas Community College	126	3,898	3.1%	96.9%
San Jacinto College	4,333	5,953	42.1%	57.9%
South Plains College	89	7,858	1.1%	98.9%
Victoria College	2,898	8,555	25.3%	74.7%
Total	8,839	41,894	17.4%	82.6%

23 Data from the U.S. Bureau of Labor Statistics highlights that compared to individuals whose highest level of educational attainment is high school, associate degree holders earn \$6,608 more a year, and bachelor’s degree holders earn \$23,260 more annually. This illustrates the financial hardship many would face to pay a \$500 bill in order to continue their education. See: Bureau of Labor Statistics. (n.d.). More education: Lower unemployment, higher earnings [Handout]. <https://www.bls.gov/emp/education-pays-handout.pdf>

24 Dallas College did not provide data by enrollment status.

Figure 1: Total Debts Held by Enrollment Status

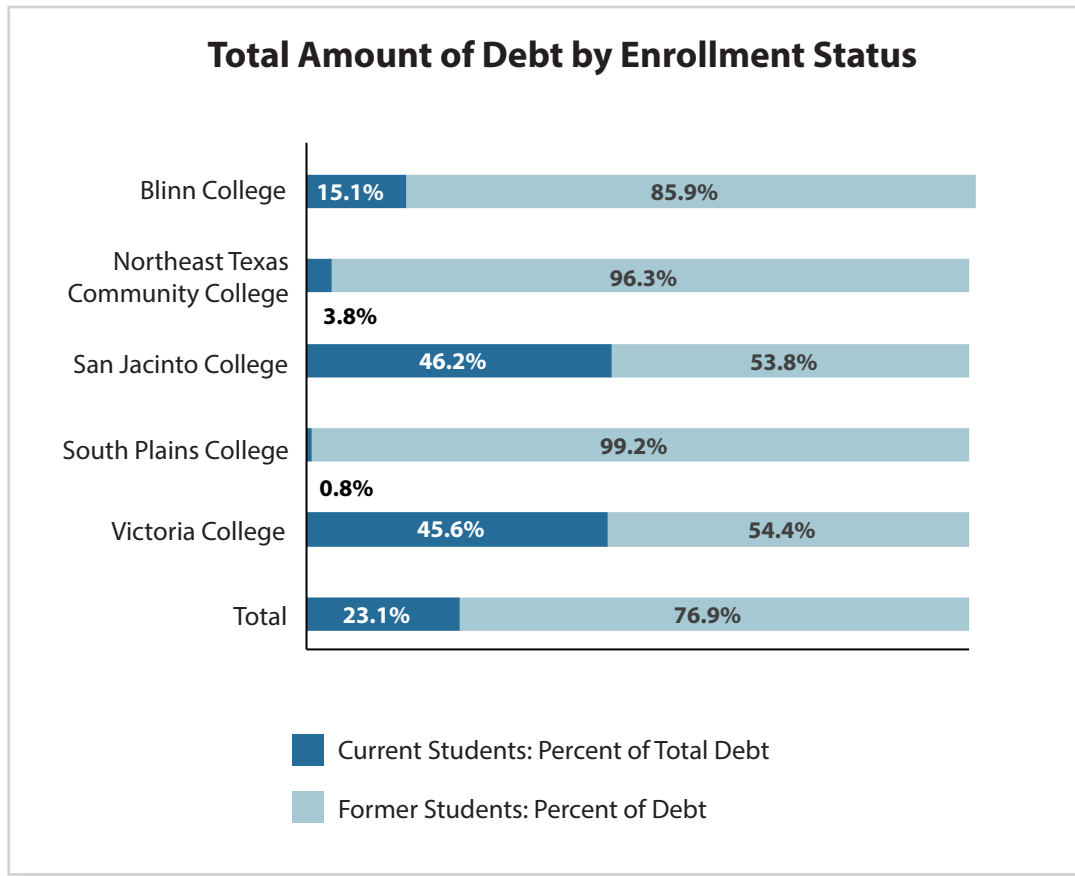


Among the debts included in this sample, 82.6% of debts belong to individuals who no longer attend the educational institution. We replicated the analysis for the dollar amount of debt disaggregated by enrollment status. Results are shown in Table 4 and Figure 2 below.

Table 4: Total Dollar Amount of Debt by Enrollment Status

College	Current Students: Amount of Debt	Former Students: Amount of Debt	Current Students: Percent of Total Debt	Former Students: Percent of Total Debt
Blinn College	\$1,382,974	\$7,765,913	15.1%	85.9%
Northeast Texas Community College	\$72,841	\$1,871,718	3.8%	96.3%
San Jacinto College	\$3,210,548	\$3,742,752	46.2%	53.8%
South Plains College	\$53,220	\$6,371,396	0.8%	99.2%
Victoria College	\$1,877,078	\$2,242,318	45.6%	54.4%
Total	\$6,596,661	\$21,994,097	23.1%	76.9%

Figure 2: Total Amount of Debt by Enrollment Status



Like the number of debts held, former students owe the majority of the dollar amount of debt, owing 76.9%. Out of the five colleges that provided enrollment status, former students owe \$21,994,097 in debt leading to a transcript hold, preventing them from furthering their education or obtaining jobs requiring a copy of their transcript.

Debts by Enrollment Status: Current Students, Graduates, and Other Statuses

Blinn College was the only school that provided enrollment status with three categories: currently enrolled, graduates, and neither enrolled nor graduated. Out of the 17,023 debts reported, people who had neither graduated nor are currently enrolled held 15,205 of debts, or 89%. The total debt for students who neither graduated nor were enrolled was \$7,559,7896, or 83% of the total outstanding debt. Though we cannot generalize this data to all institutions, it points to a likelihood that the majority of people impacted by transcript holds did not receive a degree. College graduates only held 3% of debts and 2% of the dollar amount of debt. Transcript withholding is primarily impacting individuals who are no longer students and did not receive their degrees.

For those without a degree, transcript holds are particularly harmful, as they can block former students from completing a degree program at another educational institution or returning to the same institution and receiving credit for work that was completed and paid for. These policies enable relatively small debts to derail students from completing a degree and from benefiting financially from that achievement, bolstering both individual income and the student’s ability to repay the debt.

Racial Disparities Among Those Impacted by Transcript Withholding

Transcript withholding disproportionately impacts Black students across all educational institutions in this study. Centuries of structural racism have led to a racial wealth gap, creating barriers for people of color to access education. According to a report published by The Student Borrower Protection Center, “the median white household has 13 times the wealth of the median Black household.”²⁵ Further, “during the course of their college careers, 58% of Black students receive an average of \$4,200 from their parents, whereas 72% of white students receive an average of \$12,000 from their parents.”

The racial wealth gap forces Black students to take on more debt. The Legal Defense Fund found that 86% of Black students must take out student debt compared to 68% of white students.²⁶ Black students are also disproportionately harmed by transcript withholding. The percentage of those impacted by transcript hold policies who identify as Black compared to the enrollment percentage of Black students at the institutions is shown in Table 5 and Figure 3.

Table 5: Black Students Disproportionately Harmed by Transcript Hold Policies

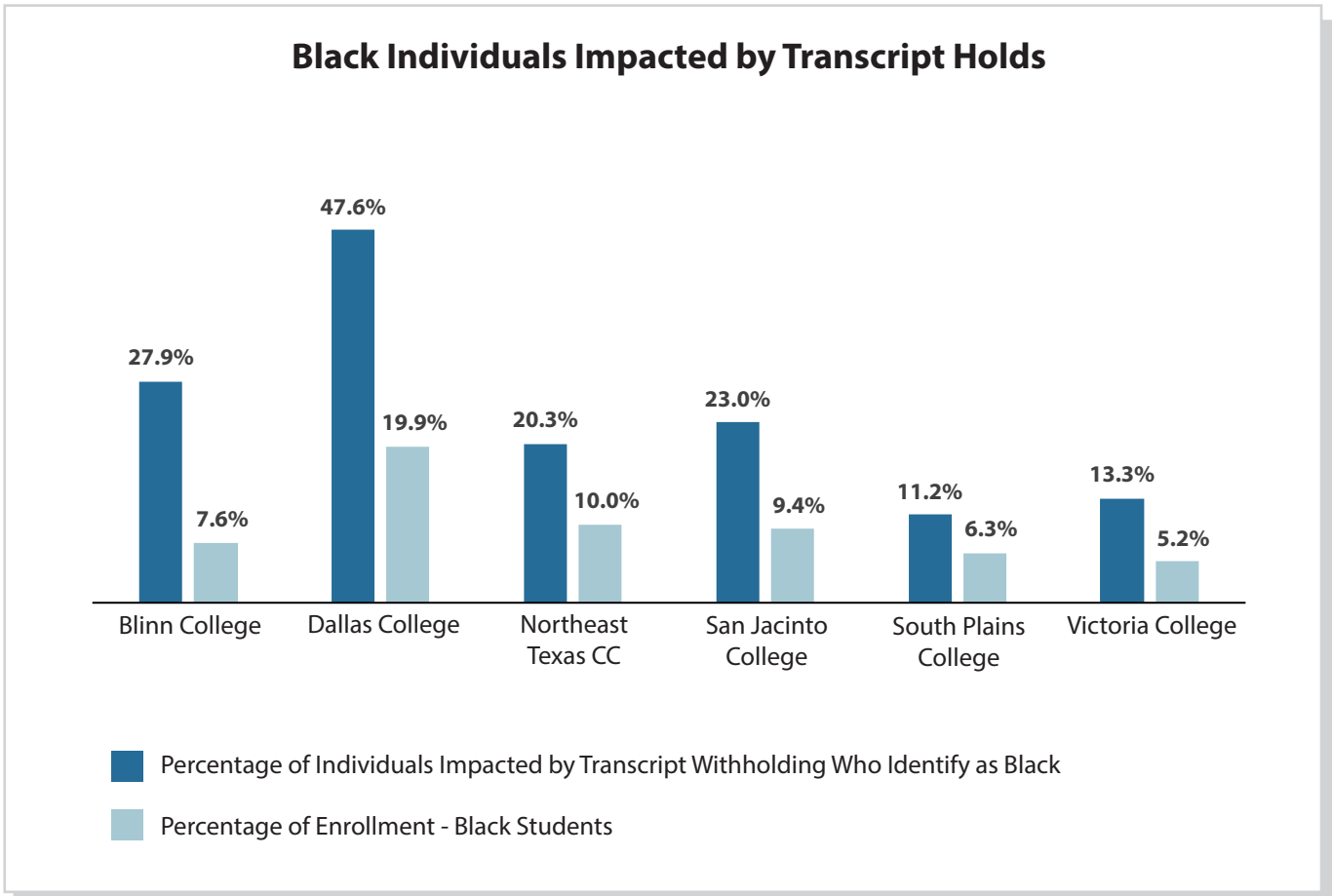
College	Percentage of Individuals Impacted by Transcript Withholding Who Identify as Black	Percentage of Enrollment - Black Students ²⁷
Blinn College	28.3%	7.6%
Dallas College	47.6%	19.9%
Northeast Texas Community College	20.3%	10.0%
San Jacinto College	23.0%	9.4%
South Plains College	11.2%	6.3%
Victoria College	13.3%	5.2%
Average	23.9%	9.7%

²⁵ Student Borrower Protection Center. (2020). Disparate Debts. <https://protectborrowers.org/wp-content/uploads/2020/06/SBPC-Disparate-Debts.pdf>

²⁶ See the following report from The Legal Defense Fund: <https://www.naacpldf.org/student-loans-racial-wealth-gap/>

²⁷ We captured enrollment numbers publicly available on the colleges' websites. Considering many individuals are not currently enrolled, we cannot definitively say the enrollment percentage at the time those individuals were enrolled.

Figure 3: Individuals Impacted by Transcript Withholding Who Identify as Black



Having policies in place that hold Texans back from completing their education, particularly for small debts, is counterproductive. It reinforces wealth gaps and undermines the ability of Texans to build the skills that are needed for the future growth of our state economy.²⁸

Age of Debt: Most Debts Resulting in Transcript Holds are More Than Five Years Old

An examination of the age of debts that results in transcript withholding sheds doubt on the usefulness of the policy as a debt collection tool. In the following table, we outline the percentage of debts that are more than five years old for each school.

²⁸ See the Appendix for debt broken down by all race/ethnicity categories for each school.

Table 6: Debts by Age²⁹

College	Debts More Than Five Years Old
Blinn College	71.5%
Dallas College	73.9%
San Jacinto Community College	12.8%
South Plains College	78.0%
Victoria College	53.4%
Average Across Colleges	57.9%

For the five schools included in this analysis, nearly 58% of debts are older than five years. This suggests that debts remain in default for a long time and are unlikely to ever be collected. Consequently, not only is withholding a transcript detrimental to the advancement of Texans’ futures, as demonstrated throughout this report, as a debt collection tool it is ineffective.

Categories of Debt

We also asked schools for debt broken down by category. Three educational institutions provided data. Categories of debt leading to transcript holds include debts obtained from bookstore charges, meals, housing, library fees, parking tickets, billing charges, tuition, and returns from Title IV funding.

Title IV funds, or federal financial aid funds, are awarded with the assumption that students complete the school term in which the funds were awarded. The U.S. Department of Education has the requirement that, “if a recipient of Title IV grant or loan funds withdraws from a school after beginning attendance, the school must perform a Return to Title IV (R2T4) calculation to determine the amount of Title IV assistance earned by the student.”³⁰ The amount determined to not be earned by the student must be returned to the federal government either by the school or by the student. Most schools return the funds, and the student is left owing the institution directly.

Eleven percent of debts from Blinn College and 3.3% of debts from Victoria College were coded by the institution as a Title IV return. However, we believe debts coded as ‘tuition’ could also be the result of financial aid returned.³¹ For example, Blinn College drops students from classes if tuition is not paid in full before classes begin, meaning an outstanding tuition debt was likely paid by Title IV funds became subject to R2T4, and the student was left owing the institution for tuition.

With the Federal rules going into effect in July 2024, debts resulting from R2T4 will no longer qualify for a transcript hold. However, students who did not receive financial aid during the time other debts were accrued are not protected under the new rules. In other words, their debts could still trigger transcript holds.

29 Northeast Texas Community College reported debt in terms of days with the oldest category being 365 days or older, thus it is excluded from this table.

30 U.S. Department of Education. (2019). Withdrawals and the Return of Title IV Funds, HEA, Section 484B. 34 CFR 668.22. <https://fsapartners.ed.gov/sites/default/files/2021-02/2019-2020%20Chapter%201%20-%20Withdrawals%20and%20the%20Return%20of%20Title%20IV%20Funds.pdf>

31 Our data request specified we were only interested in debts leading to transcript holds. Students cannot enroll if tuition is not paid in full, so we assume the debt was R2T4 and students were left owing the institution. Otherwise, there is an issue with how colleges report and track debt.

Colleges' inconsistent reporting and coding of the category of debt speaks to issues with data tracking and transparency. These inconsistencies further highlight the need to push for data transparency linking debt to transcript holds, and consistency in reporting across institutions.³²

CONCLUSION

The practice of withholding transcripts due to unpaid debts is an ineffective means to collect debt, but very effective in creating barriers for Texans to further their education, obtain employment, and increase their earning potential. While the practice is permitted by the Texas Education Code, implementation of the policy is left to the discretion of the institution. All six of the community colleges we sampled practice transcript withholding for unpaid debt, when they could simply opt out to the benefit of their students.³³

Texas should follow other states' lead and ban this practice altogether. We recommend the following:

1. Texas should prohibit higher education institutions from placing holds on students' transcripts for unpaid debt. Students only use transcripts for their advancement and transcript holds are not effective in collecting institutional debt.
2. Absent a total ban on transcript withholding, requiring data reporting would provide added insight into the problem in Texas and would inform future policy solutions.

Helpful data would include:

- a. the total number of individuals with debts preventing the release of a transcript;
- b. the total number of debts resulting in a transcript hold, disaggregated by the type of debt, amount of debt, date the debt triggered the hold, enrollment status of the student, and amount the student has paid toward the debt;
- c. clarity on the category of debt, especially which debts were incurred following Return to Title IV;
- d. the total amount of past-due debt collected;
- e. payment plans available for individuals who wish to settle a debt and obtain their transcript;
- f. the total number of individuals whose debts to higher education institutions have been sent to collection and the amount of debt collected through those means; and
- g. a narrative explanation of other administrative policies that affect individuals with debts.

³² These inconsistencies were so extreme among universities that we had to exclude them from this report.

³³ Dallas College only places a hold on transcripts if the debt is greater than \$250. All other institutions withhold a transcript for any amount of debt.

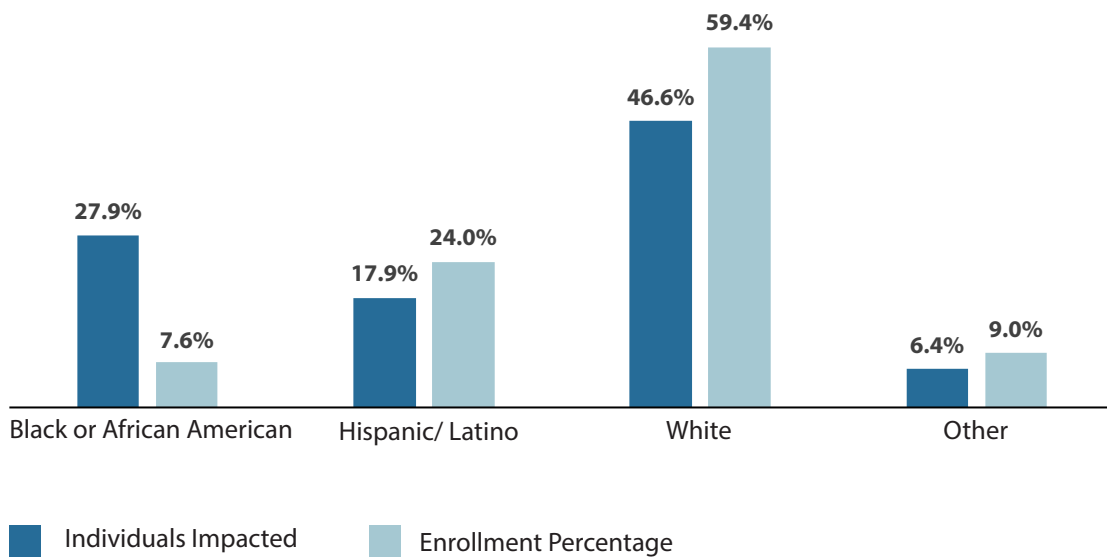
APPENDIX: DEBT BY RACE

Blinn College

Blinn College: Individuals Impacted by Transcript Withholding by Race

Blinn College Race	Individuals Impacted	Percentage of Individuals Impacted	Enrollment Percentage
American Indian or Alaska Native	81	0.5%	0.6%
Asian	210	1.2%	2.6%
Black or African American	4,746	27.9%	7.6%
Hispanic/Latino	3,045	17.9%	24.0%
International	23	0.1%	0.4%
Two or More Races	480	2.8%	3.9%
Native Hawaiian or Other Pacific Islander	17	0.1%	0.1%
White	7,928	46.6%	59.4%
Unreported	493	2.9%	1.5%

Blinn College: Individuals Impacted by Race

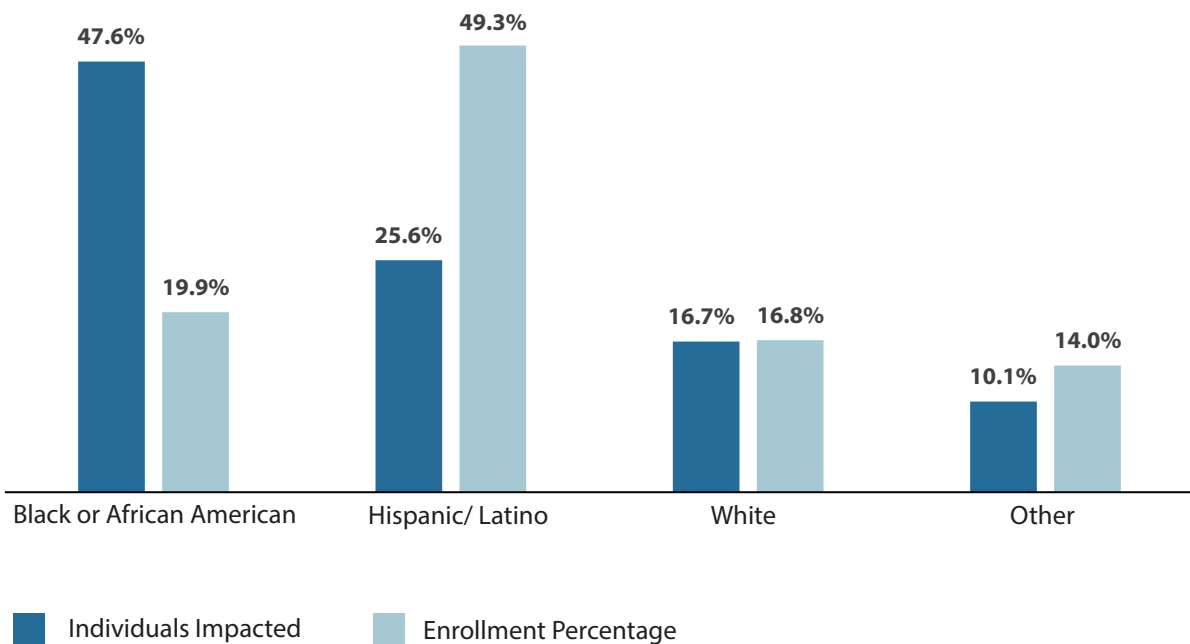


Dallas College

Dallas College: Individuals Impacted by Transcript Withholding by Race

Dallas College Race	Individuals Impacted	Percentage of Individuals Impacted	Enrollment Percentage
American Indian/ Alaskan Native	20	0.5%	-
Asian	91	2.2%	8.5%
Black or African American	1,962	47.6%	19.9%
Hispanic/Latino	1,056	25.6%	49.3%
International	5	0.1%	-
Native Hawaiian or Other Pacific Islander	4	0.1%	-
White	687	16.7%	16.8%
Two or More Races	123	3.0%	2.0%
Unknown	172	4.2%	4.0%

Dallas College: Individuals Impacted by Race

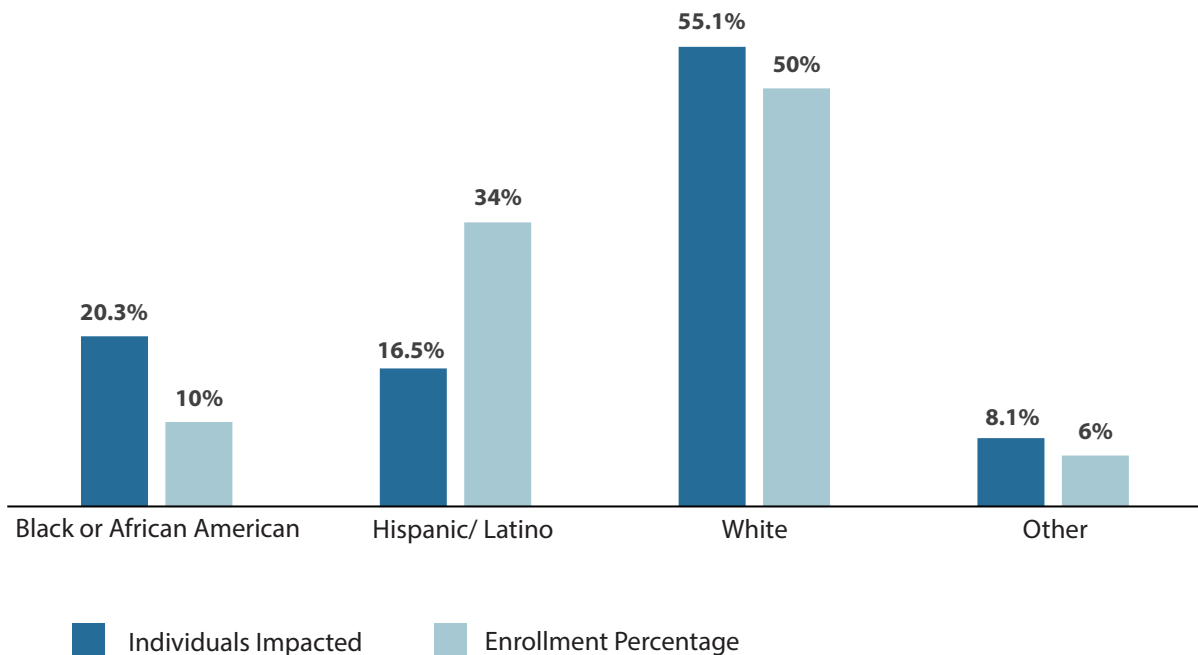


Northeast Texas Community College

Northeast Texas CC: Individuals Impacted by Transcript Withholding by Race

Northeast Texas Community College Race	Individuals Impacted	Percentage of Individuals Impacted	Enrollment Percentage
American Indian or Alaska Native	26	0.7%	1%
Asian	25	0.6%	1%
Black or African American	817	20.3%	10%
Hispanic/Latino	663	16.5%	34%
Native Hawaiian or Other Pacific Islander	2	0.1%	-
International	64	1.6%	2%
Unknown	60	1.5%	-
Two or More Races	78	1.9%	2%
White	2,218	55.1%	50%
No Data	71	1.8%	-

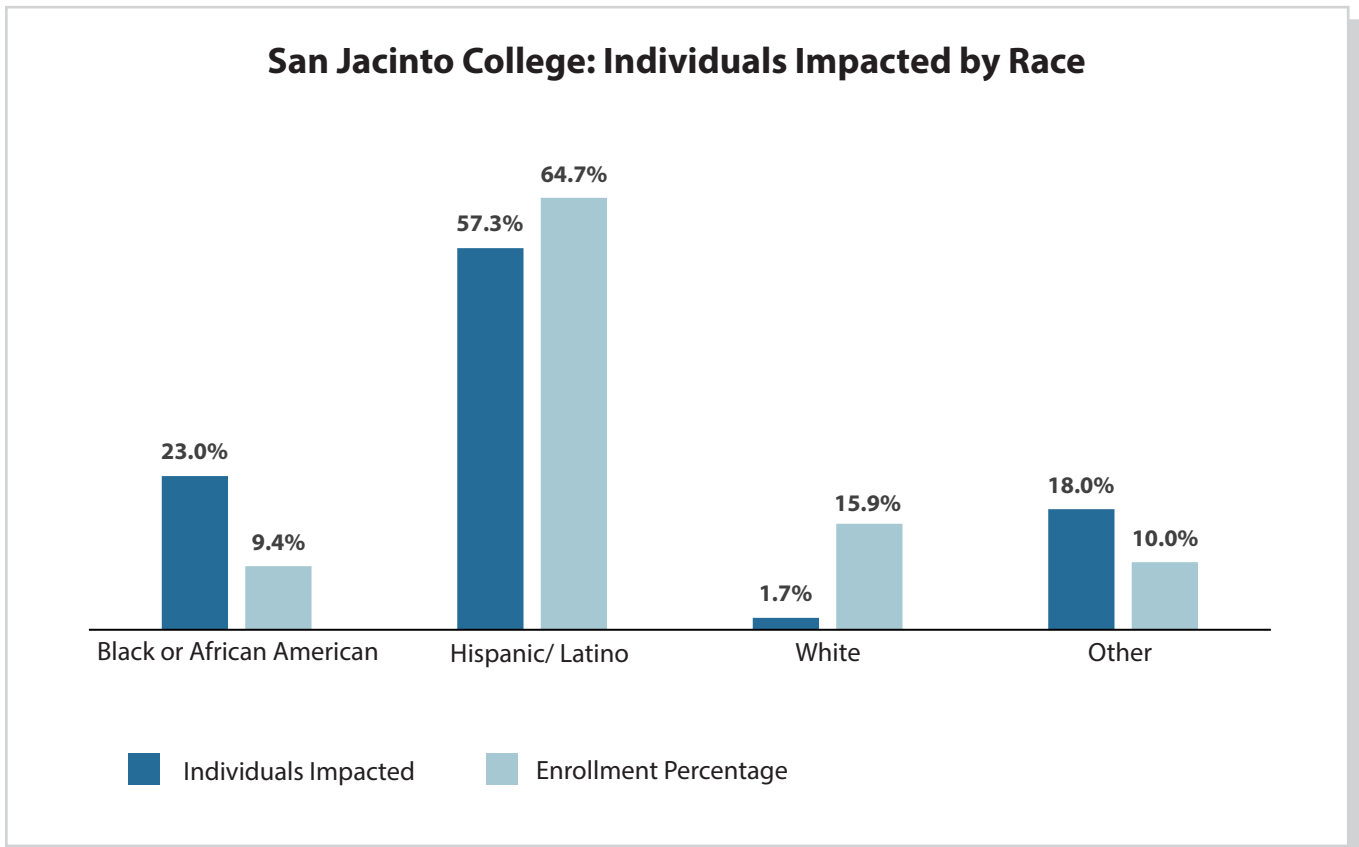
Northeast Texas Community College: Individuals Impacted by Race



San Jacinto Community College

San Jacinto College: Individuals Impacted by Transcript Withholding by Race

San Jacinto College Race	Individuals Impacted	Percentage of Individuals Impacted	Enrollment Percentage
American Indian/Alaskan Native	49	0.5%	0.5%
Asian	217	2.1%	5.8%
Black or African American	2,368	23.0%	9.4%
Hispanic/Latino	5,892	57.3%	64.7%
International	36	0.4%	0.5%
Native Hawaiian or Other Pacific Islander	11	0.1%	0.1%
White	178	1.7%	15.9%
Unknown	1,535	14.9%	3.1%

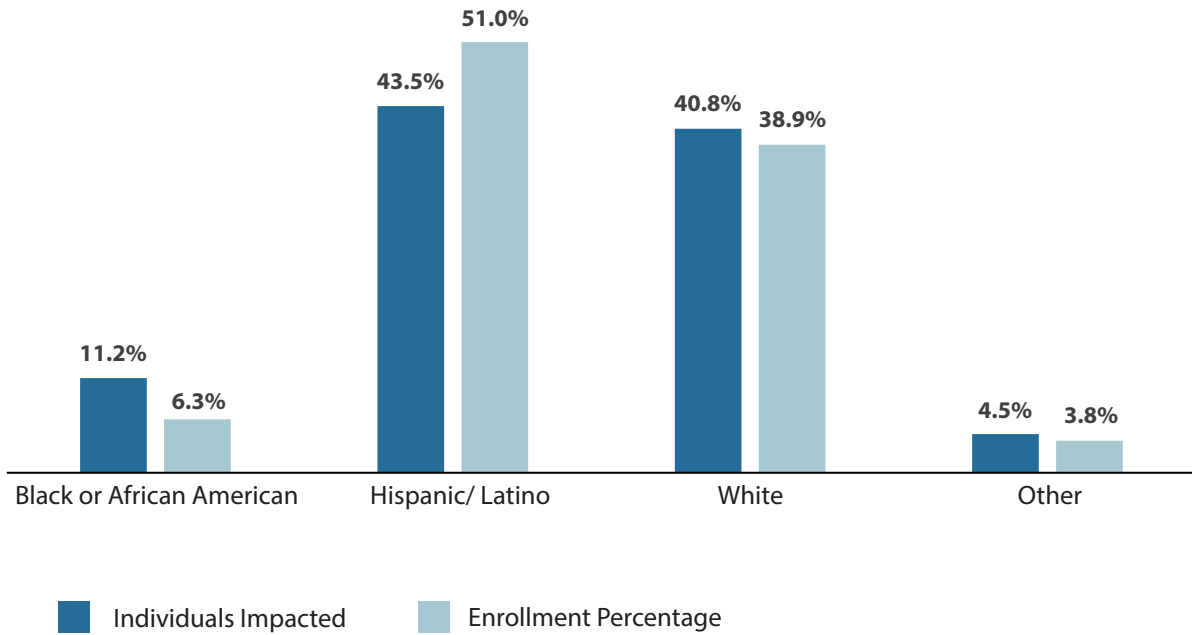


South Plains College

South Plains College: Individuals Impacted by Transcript Withholding by Race

South Plains College Race	Individuals Impacted	Percentage of Individuals Impacted	Enrollment Percentage
American Indian Alaska Native	246	3.1%	1.7%
Asian/Pacific Islander	56	0.7%	2.1%
Black or African American	891	11.2%	6.3%
Hispanic/Latino	3,458	43.5%	51.0%
International	17	0.2%	1.1%
Unknown/ Not Reported	35	0.4%	-
White	3,244	40.8%	38.9%

South Plains College: Individuals Impacted by Race



Victoria College

Victoria College: Individuals Impacted by Transcript Withholding by Race

Victoria College Race	Individuals Impacted	Percentage of Individuals Impacted	Enrollment Percentage
American Indian/Alaskan Native	167	1.5%	0.1%
Asian or Pacific Islander	102	0.9%	0.3%
Black or African American	1,519	13.3%	5.2%
Hispanic/Latino	4,663	40.7%	51.2%
International	6	0.1%	-
White	4,703	41.1%	39.1%
Unknown	293	2.6%	-

Victoria College: Individuals Impacted by Race

