

2022

A REPORT FROM THE COUNCIL OF PRESIDENTS

CENTRAL WASHINGTON  
UNIVERSITY



EASTERN WASHINGTON  
UNIVERSITY



THE EVERGREEN STATE  
COLLEGE



UNIVERSITY OF  
WASHINGTON



WASHINGTON STATE  
UNIVERSITY



WESTERN WASHINGTON  
UNIVERSITY

# HOUSE BILL 2513 COMPLIANCE



WASHINGTON STATE  
*Council of*  
**Presidents**

[www.councilofpresidents.org](http://www.councilofpresidents.org)

October 2022

## About the Council of Presidents

The Council of Presidents (COP) is an association of Washington's six public baccalaureate degree-granting college and universities. Located in Olympia, Washington, COP strives to be a common voice for the public baccalaureate sector and the most respected and trusted resource for decision makers on issues affecting public higher education. COP serves as the coordinating role for a number of initiatives and activities common to the public baccalaureate institutions, fostering coordination and collaboration among the public baccalaureates as well as with other educational partners, both in Washington and nationally.

This report is also available online at [councilofpresidents.org](https://councilofpresidents.org).

## Introduction

RCWs [28B.10.293](#) and [28B.10.294](#) require the Council of Presidents (COP), on behalf of Washington's public baccalaureate institutions, to submit a report regarding official transcript and registration holds used as debt collection tools by Washington's public baccalaureate institutions (See Appendices A and B). According to RCW 28B.10.294, the report must include the following:

- ◆ Each institution's policy on when transcript and registration holds are used, including the time frames and amounts for which holds are to be used and the lowest amount for which an institution assigns a debt to a third-party collection agency.
- ◆ The number of official transcripts and registration privileges being withheld by each institution.
- ◆ The number of past-due accounts assigned to third-party collection agencies.

## Reducing Barriers for Students

Our member institutions are committed to reducing process and fiscal barriers for students to maximize the ability for each student to successfully complete their degree and accomplish their educational and career goals. Institutions offer an array of services and resources to communicate and help students experiencing outstanding student account balances. Students make good decisions about their finances when they possess greater levels of knowledge about processes and opportunities.

For example, across the sector institutions are engaged in the following:

- ◆ Clear, accessible and frequent communication with students regarding balances owed and processes for repayment, including flexible repayment options and appeals processes.
- ◆ Collaboration with other campus offices for potential resolution when appropriate.
- ◆ Resources and services to address outstanding student account balances including information through offices of financial aid for additional financial resources.
- ◆ Publications focused on information about what students can do to manage their educational expenses effectively, including materials on how to create a budget, loan repayment options, scholarships and grant opportunities.
- ◆ Programming and resources focused on financial planning including financial aid workshops focused on personal financial planning and debt management, student-led seminars designed to prepare both college and high school students for long-term financial decision-making, and financial literacy courses to learn personal finance concepts.
- ◆ Emergency assistance programs for students with immediate needs for housing, food and other expenses including the use of federal funds from the American Rescue Plan. More information can be found [here](#).

## Summary from the Council of Presidents

Washington's public baccalaureate institutions, in compliance with [RCW 28B.10.293](#) and [RCW 28B.10.294](#) as they pertain to student debts not related to tuition fees, room and board fees and/or financial aid funds owed, do not:

- ◆ Refuse to provide an official transcript for current or former students due to debt owed.
- ◆ Condition the provision of an official transcript on the payment of debt other than a fee charged to provide the official transcript.
- ◆ Charge a higher fee for obtaining the official transcript or provide less than favorable treatment of an official transcript request due to debt owed.
- ◆ Withhold registration privileges as a debt collection tool.
- ◆ Withhold student official transcripts, regardless of debt, when an official transcript is requested by a student or entity for a job application and to transfer to another institution, apply for financial aid, pursue opportunities in the military or national guard and of other postsecondary opportunities.

In those cases in which a member institution does withhold an official transcript or registration privileges for debt collection purposes, institutions are committed to accessible, clear and transparent communication of policies, processes, and practices. This includes the use of a secure portal or email through the institutional class registration process for each term to inform students of the amount debt owed by the student to the institution, ways to pay off the debt and any consequences that will result from the non-payment of the debt.

Below is a summary from each of COP's six member institutions regarding implementation of the statutes. The holds represent a snapshot of active accounts. Institutions continuously work with students to address outstanding balances, with the goal of avoiding a delay in transcripts or registration for the next term. Most registration holds will likely be resolved and result in timely registration.

### Central Washington University

Central Washington University does not hold student official transcripts for outstanding balances for any timeframe or amount. Registration holds are used when a student owes more than \$1,000 in tuition and housing costs and are placed when the tuition and housing costs are more than 30 days past due. The lowest amount Central Washington University assigns a debt to a third-party collection agency is \$10.00.

As of the end of September 2022, there are no official transcript holds, and CWU has 171 active and current students with a registration hold for the past due balance of tuition and housing costing over \$1,000. CWU does not do registration holds on anything below \$1,000. The number of active past-due accounts assigned to a third-party collection agency was 1,550. This figure excludes accounts that are written-off as uncollectable.

Central Washington University has implemented policies and practices to reduce official transcript and registration barriers for students. Students who have a registration hold are sent communications that direct them to financial aid to seek additional financial resources. In addition, students who have not completed a FAFSA/WASFA receive communications encouraging them to apply for student financial aid.

### Eastern Washington University

Eastern Washington University does not hold student official transcripts for outstanding balances for any timeframe or amount. Registration holds may be placed on student accounts who have an outstanding financial obligation to the University that is more than 30 days after notice of the University's final determination of an outstanding financial obligation. Registration holds are only applied for debts related to tuition, fees, room and board or financial aid owed. There is no minimum threshold set by the University to assign a debt to a third-party collection agency.

As of the end of September, there were no official transcript holds. The number of active past-due accounts assigned to a third-party collection agency was 320, totaling approximately \$1,156,582.04.

Eastern Washington University has implemented policies and practices to reduce official transcript and registration barriers for students. In October 2020, the University updated the institutional WAC regarding outstanding financial obligations to the university. [WAC 172-144](#) identifies the process for notifying students of outstanding financial obligations including the amount of the debt owed, the basis for the claim, timeline for repayment and the process and rights of the student to challenge the debt owed.

## The Evergreen State College

The Evergreen State College places a hold on student official transcripts and registration privileges for accounts that are late ranging from 30-90+ days, at collection or uncollectable and/or for outstanding Perkins Loan amounts or exit interview. Official transcript and registration holds are placed on student accounts if the amount is greater than \$2.00 and the account is 30 days past due. The Student Accounts Office periodically reviews accounts with holds and implements professional judgement to determine if an unpaid hold may be released.

The lowest amount The Evergreen State College assigns a debt to a third-party collection agency is \$50.00. As of the end of September, there were 715 active official transcript and/or registration holds. The number of active past-due accounts assigned to a third-party collection agency was 326.

The Evergreen State College has implemented policies and practices to reduce official transcript and registration barriers for students. When a student has a past-due account and requests an official transcript, this triggers a notice to the Registrar who will send the student information to Student Accounts to allow for engagement with the student. While the College already released official transcripts directly to future employers, the College recently implemented a policy to release official transcripts to other institutions of higher education combined with an opportunity to contact the student to try to implement a repayment agreement. A repayment agreement is mandatory only for past due tuition and fees.

Current students with a past-due account may pre-register for the next upcoming quarter if the past-due amount can be covered by financial aid or other means of payment. There is some flexibility, and a student may be allowed to register for one more quarter with the understanding that they will not be able to continue further unless all past due balance is paid. If the past due costs are not from tuition and fees, the College allows students to register after finalizing a repayment agreement.

## University of Washington

With the many challenges University of Washington students and community faced this past year with COVID-19, starting last March 2020, the University suspended the assignment of new past-due accounts to third-party collection agencies. The University has continued to monitor the situation and has begun assignment to third-part collection agencies this past fall.

The University of Washington does not hold student official transcripts for outstanding balances for any timeframe or amount. Registration holds are placed on student accounts when there are past-due balances for tuition fees, room and board and financial aid funds owed as defined by the RCW 28B.10.293. Holds for financial aid funds owed are placed on a student account immediately while holds for past-due tuition fees are placed when accounts are two weeks past-due. Holds due to room and board are placed either 21 days or 61 days past-due depending on the campus. The holds remain enforced until the past-due balance is cleared, or a request is made to release the hold due to a qualifying reason. The lowest amount the University of Washington assigns a debt to a third-party collection agency ranges from \$0.00 to \$500 dependent on the campus and type of past-due charge.

As of the end of September 2022, there were no official transcript holds and there were 3,664 active registration holds. The number of active past-due accounts assigned to a third-party collection agency was 238.

Since the new law went into effect, the University of Washington has implemented policies and practices to reduce official transcript and registration barriers for students. These include: educating academic and administrative departments regarding the new law; discontinuing the use of official transcript holds as a debt collection tool; temporarily suspending the assigning of past-due accounts to third-party collection agencies; collaboration with other campus offices for potential resolution when appropriate; providing flexible repayment options; enhancing certain appeal processes to request an administrative review of charges and prevent further escalation until resolution, and growing the emergency aid program to assist students with immediate needs for housing, food, medical, technology expenses and small balance tuition bills due.

### Washington State University

Washington State University does not hold student official transcripts for any timeframe or amount. Registration holds are placed on a student account when the account is past due and a student currently enrolled owes \$1,000.00 or more and \$25.00 or more for a student not currently enrolled. Registration holds are placed strategically throughout the semester to reduce barriers for students. Fall and spring holds are usually placed after the 10th day of classes for outstanding tuition and fee balances. The lowest amount Washington State University assigns a debt to a third-party collection agency is \$25.00.

As of the end of September, Washington State University had 1,423 official registration privilege holds for current students. The cumulative number of active past-due accounts assigned to a third-party collection agency was 3,736.

Washington State University has implemented policies and practices to reduce official transcript and registration barriers for students. The University is currently reviewing its hold policies. During the review process and until policies are finalized, the University is processing official transcripts regardless of any holds on a student account and if a student contacts the University the hold on registration will be removed.

### Western Washington University

Western Washington University does not hold student official transcripts for outstanding balances for any timeframe or amount. Registration holds are placed on a weekly basis during quarters of enrollment after late fees have been assessed on accounts. Holds are placed on past due balances resulting from specific charges related to tuition, certain mandatory fees, housing and meal charges contracted with the university, and financial aid funds owed to the university. Holds are released when a balance drops below \$250 or when the student establishes a reasonable payment plan with the university. The lowest amount Western Washington University assigns a debt to a third-party collection agency is \$25.00.

As of the end of September, there were no official transcript holds and there were 781 active registration holds. The number of active past-due accounts assigned to a third-party collection agency was 547.

Western Washington University has implemented policies and practices to reduce official transcript and registration barriers for students. These include: implementation of a quarterly payment plan to allow students and families to make three payments for tuition and fees over three months, work to connect, through referral or otherwise, with a student who is struggling to pay their bill and establish a reasonable payment arrangement, notify students and authorized payers regarding the availability of statements on a monthly basis and access to the payment portal 24 hours a day, 7 days a week for online payments.

## Next Steps

Washington's public four-year college and universities will continue to review, address and implement policies and practices that reduce barriers to successful student degree completion. The Council of Presidents will report on institutional policies for official transcript and registration holds, the number of holds and the number of past-due accounts assigned to a third-party collection agency each year. The next report is due November 1, 2023.

## Appendix A

### RCW 28B.10.293

Collection of debts—Conditions and limitations on institutions of higher education.

1. Institutions of higher education may, in the control and collection of any debt or claim due owing to it, impose reasonable financing and late charges, as well as reasonable costs and expenses incurred in the collection of such debts, if provided for in the note or agreement signed by the debtor.
2. Institutions of higher education may not do any of the following for the purposes of debt collection, unless the debts are related to nonpayment of tuition fees, room and board fees, or financial aid funds owed:
  - a. Refuse to provide an official transcript for a current or former student on the grounds that the student owes a debt;
  - b. Condition the provision of an official transcript on the payment of the debt, other than a fee charged to provide the official transcript;
  - c. Charge a higher fee for obtaining the official transcript, or provide less than favorable treatment of an official transcript request because a student owes a debt; or
  - d. Use transcript issuance as a tool for debt collection.
3. Institutions of higher education may not withhold a student's official transcript, regardless of debt, except the fee charged to provide an official transcript, if the official transcript is requested by a student or entity for any of the following purposes:
  - a. Job applications;
  - b. Transferring to another institution;
  - c. Applying for financial aid;
  - d. Pursuit of opportunities in the military or national guard; or
  - e. Pursuit of other postsecondary opportunities.
4. Institutions of higher education may not withhold registration privileges as a debt collection tool, excluding the case of any debts related to nonpayment of tuition fees, room and board fees, or financial aid funds owed.
5. If an institution of higher education chooses to withhold official transcripts or registration privileges as a tool for debt collection, the institution shall disclose to students through a secure portal or email and the class registration process the following at the start of each academic term:
  - a. The amount of debt, if any, owed by the student to the institution;
  - b. Information on payment of the debt, including who to contact to set up a payment plan; and
  - c. Any consequences that will result from the nonpayment of the debt.

6. For the purposes of this section:

- a. “Debt” means any money, obligation, claim, or sum, due or owing, or alleged to be due or owing, from a student.
- b. “Financial aid funds owed” means any financial aid funds owed to the institution under Title IV, or to the state, due to miscalculation, withdrawal, misinformation, or other reason, not including standard repayment of student loans.
- c. “Institutions of higher education” means the same as in [RCW 28B.92.030](#).
- d. “Room and board fees” means any money, obligation, claim, or sum, due or owing, or alleged to be due or owing, from a student for the provision of contractually agreed to on-campus housing or meal services plans.
- e. “Tuition fees” means tuition fees as defined in [RCW 28B.15.020](#), services and activities fees as defined in [RCW 28B.15.041](#), technology fees as defined in [RCW 28B.15.051](#), and fees charged for nonstate funded, fee-based, self-supporting degree, certificate, or continuing education courses, or similar charges for nonpublic institutions.

[\[ 2020 c 281 § 1; 1977 ex.s. c 18 § 1.\]](#)

## Appendix B

### RCW 28B.10.294

#### **Collection of debts—Report.**

Institutions of higher education shall report to the governor and the higher education committees of the legislature in accordance with [RCW 43.01.036](#) annually beginning on December 1, 2020, on transcript and registration holds used as debt collection tools, including:

- (1) Each institution's policy on when transcript and registration holds are used, including the time frames and amounts for which holds are to be used and the lowest amount for which an institution assigns a debt to a third-party collection agency;
- (2) The number of official transcripts and registration privileges being withheld by each institution; and
- (3) The number of past-due accounts assigned to third-party collection agencies. [[2020 c 281 § 2.](#)]