



COMMONWEALTH UNIVERSITY OF PENNSYLVANIA

Financial Obligations Policy

Policy Number 6-01

Commonwealth University of

Pennsylvania Approved by University

Senate, 4/10/2025 Revised March 14, 2024

Issued by President Bashar W. Hanna as Policy 6-01 on 4/21/2025

Responsible Office: Student Billing Office, Office of Financial Aid and Office of the Registrar

Previous Policy: PRP 5361

1. Purpose

The purpose of this policy is to establish guidelines for use by offices that are authorized to withhold a student transcript and/or diploma. These guidelines are intended to encourage student responsibility while supporting retention and student success.

In October 2023, the Department of Education published a final regulation addressing financial responsibility, administrative capability, certification procedures and Ability to Benefit. [Biden-Harris Administration Releases Final Rules that Strengthen Accountability for Colleges and Consumer Protection for Students | U.S. Department of Education.](#)

Within the certification procedure provisions, DOE made changes to its Program Participation Agreements with institutions to prohibit withholding transcripts in certain circumstances.

Institutions cannot withhold transcripts—or take other negative actions against a student—in cases where a debt on a student’s account is created because of an error made by the institution in administering Title IV funds, or when there is fraud or misconduct by the institution or its employees.

An institution will have to provide an official transcript to a student for payment periods when the student received Title IV aid and all institutional charges for that payment period were paid or included in an agreement to pay.

Institutions will be able to utilize other existing methods of collecting a balance on a student’s account.



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2. Scope

This policy applies to all members of the Commonwealth University of Pennsylvania community, that have the capability of withholding a transcript and/or diploma.

3. Definitions, Roles and Responsibilities

3.1.1. Definitions

3.1.1.1. **Withhold transcript and/or diploma** - The process by which offices restrict access to the academic record(s) of a student. This restriction prevents a student from requesting a transcript and/or diploma.

3.1.1.2. **Payment period paid** – A payment period paid for with Title IV funds **AND** all institutional charges for the payment period were paid (or included in an agreement to pay).

3.1.2. **[Term:]** Any semester/term where the financial obligation to Commonwealth University has not been satisfied in full.

3.2. Roles and Responsibilities

3.2.1. Office of the Registrar, Office of Financial Aid and Student Billing Office

4. Policy

4.1. Students must receive timely notice when a restriction has been placed on his/her record by the restricting office. Restriction lists must be reviewed and updated regularly, particularly at the end of the semester, and just prior to opening of course selection for future terms. If a student satisfies a restricting office's requirement, the restriction on his/her record or account will be removed within one business day and only when the funds have cleared. Payments to satisfy debts at outside agencies must be cleared and reported to Commonwealth University before the restriction is removed.

5. Procedures, Standards, and Guidelines

5.1.1 Restricting offices will review student requests for a transcript and/or diploma prior to removing the restriction. Review will include but is not limited to student account balance, previous payment period paid for with Title IV funds applied to the student account, if any and prior payment plan obligations, if any.



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6 Compliance and Enforcement

- 6.1 Every University policy will undergo a regular review on a five-year cycle, with approximately 20% of the total policies inventory being reviewed each year.
- 6.2 All policy reviews will be conducted by the responsible Senate Committee to assure that the policy remains relevant and aligns with applicable federal and state laws and regulations, PASSHE Board of Governors policies, and other University policies, procedures, standards, or guidelines.

7. Additional Information

6.3 Supporting Documents

- 6.3.1 [Include title of supporting documentation here.] [Link]

6.4 History

- 6.4.1 Policy supersedes an existing policy which was effective May 1, 2009.
- 6.4.2 Effective Date – [Date Approved by the University Senate or Issued by the Office of the President as an Interim Policy]
- 6.4.3 Revised – March 14, 2024
- 6.4.4 Next Review Date - [Date of Revision]

6.5 Related Policies - [Reference related policies]

6.6 Contacts for Additional Information and Reporting

Office of the Registrar (registrar@commonwealthu.edu), Office of Financial Aid (financialaid@commonwealthu.edu) and Student Billing Office (studentbilling@commonwealthu.edu).