

BOARD OF REGENTS  
BRIEFING PAPER  
**Transcript Fees for Internal Transcript Requests**

**BACKGROUND & POLICY CONTEXT OF ISSUE:**

Board policy currently provides that transcript fees do not require Board approval and shall be in an amount that does not exceed the cost of producing the transcript plus postage, including costs for expedited delivery. The cost of production may include salary and other employee costs associated with production (Title 4, Chapter 17, Section 21 of the *Handbook*.) At the Board's Special Meeting on January 22, 2016, the Board requested a policy revision to prohibit charging students a fee for transcripts that are exchanged electronically between NSHE institutions.

NSHE institutions currently charge a transcript fee ranging from \$2 to \$10 or more depending on the institution and whether the student requests delivery by mail, electronic or an expedited service. Six of the institutions currently utilize the National Student Clearinghouse (Clearinghouse) for transcript requests, and UNLV utilizes an effective, homegrown system. The Clearinghouse currently charges a \$2.25 transaction fee in addition to the NSHE institutional transcript fees. The institutions that are using the Clearinghouse indicate it provides customer service to students at a level the institutions cannot consistently provide with existing staff and resources. The service includes responding to student inquiries, controls for electronic signatures, collection of fees, and the bundling of the transcript requests and sending them directly and electronically to PeopleSoft. Further, the Clearinghouse is FERPA and electronic signature compliant. UNLV's system includes all of the provisions available through the Clearinghouse and is FERPA compliant, as well.

As drafted, the attached policy revision does not prohibit institutions from continuing to utilize the Clearinghouse for transcript requests, and the Clearinghouse has confirmed that a separate request process can be created for students requesting to send a transcript electronically to another NSHE institution. It is important to recognize that while the students requesting to send a transcript electronically to another NSHE institution would not be charged any fees, institutions that continue to use the Clearinghouse would be required to cover/absorb the Clearinghouse's transaction fee (\$2.25 currently) that it charges for all transcript requests, regardless of recipient. Attached is the estimated revenue loss and cost for the institutions if this policy is adopted. The institutions that elect to continue utilizing the Clearinghouse will need to work with the Clearinghouse to eliminate any charges to NSHE students for internal electronic transcript exchanges, including Clearinghouse transaction fees. Institutions would be able to continue to charge students for any other type of transcript request, including a printed copy of a transcript for any reason, including for another NSHE institution; transcript requests for non-NSHE post-secondary institutions; and transcript requests for any other non-NSHE entities, including current or prospective employers.

In addition, based on discussions with the institutions regarding this proposed policy revision, System staff recommends new policy language to further facilitate transfer of transcript data between NSHE institutions under certain activities supporting student success. Specifically, the recommended policy language authorizes NSHE institutions to establish protocols for the exchange electronic transcript data for the purpose of facilitating transfer admission, reverse transfer, supplemental enrollment evaluation, graduation, and similar activities provided student consent is obtained in compliance with the federal Family Educational Rights and Privacy Act (FERPA) and NRS 396.535.

**Effective Date**

To allow institutions to develop the necessary changes in the process for requesting transcripts, System staff recommends an effective date for this policy proposal of no later than February 1, 2017.

**SPECIFIC ACTIONS BEING RECOMMENDED OR REQUESTED:**

Amend Board policy to prohibit institutions from charging students a fee for electronic transfers of transcript data between NSHE institutions. In addition, authorize NSHE institutions to establish protocols for the exchange of electronic transcript data for the purpose of facilitating transfer admission, reverse transfer, supplemental enrollment evaluation, graduation, and similar activities provided student consent is obtained in compliance with the federal Family Educational Rights and Privacy Act (FERPA) and NRS 396.535. (See the attached policy proposal.)

**IMPETUS (WHY NOW?):**

At its January 22, 2016, Special Meeting, the Board of Regents requested a policy revision to prohibit charging students a fee for internal exchange of NSHE transcripts.

**BULLET POINTS TO SUPPORT REQUEST/RECOMMENDATION:**

- Transcript exchanges between NSHE institutions occur electronically and at minimal cost to the institution. This proposal will eliminate the current costs to students for internal electronic NSHE transcript exchange.
- The policy revision promotes student success by reducing costs to students and facilitating reverse transfer and transfer between NSHE institutions.
- The policy revision will not impact an institutions' ability to place a hold on a transcript request from a student with a delinquent account.

**POTENTIAL ARGUMENTS AGAINST THE REQUEST/RECOMMENDATION:**

This proposal is limited to internal electronic exchanges only.

**ALTERNATIVE(S) TO WHAT IS BEING REQUESTED/RECOMMENDED:**

Retain the existing policy.

**COMPLIANCE WITH BOARD POLICY:**

- Consistent With Current Board Policy: Title #\_\_\_\_\_ Chapter #\_\_\_\_\_ Section #\_\_\_\_\_
- Amends Current Board Policy: Title 4, Chapter 17, Section 21 and *new* Section 22.
- Amends Current Procedures & Guidelines Manual: Chapter #\_\_\_\_\_ Section #\_\_\_\_\_
- Other:\_\_\_\_\_

X Fiscal Impact: Yes\_\_X\_\_ No\_\_\_\_\_

Explain: Estimated revenue loss for internal, electronic transcripts (annual): \$75,288.50. Estimated cost to the institutions for the Clearinghouse's transaction fee for internal electronic transcripts (annual): \$23,982.25. Total Estimated Fiscal Impact (annual): \$99,270.75.

**POLICY PROPOSAL**  
**TITLE 4, CHAPTER 17, SECTION 21**  
**Student Fees – Transcripts**  
**EFFECTIVE DATE: NO LATER THAN FEBRUARY 1, 2017**

Additions appear in *boldface italics*; deletions are [~~stricken~~ and bracketed]

Section 21. Student Fees

1. It is the policy of the Board of Regents that Student Fees exist only in cases of additional administrative or other service costs incurred by the institution for a necessary student activity or requirement that are not specific to one course or type of course. Student Fees may be assessed to provide services to the students for:
  - (a) special events or activities such as graduation,
  - (b) special services provided by the institution such as personal/group counseling including psychological and testing, substance abuse counseling, health services, international student services,
  - (c) third party pass-through charges such as test administration, certifications or contracted health services. An additional administrative charge of up to \$25 may be added to the pass-through cost.
  - (d) special general instructional requirements such as a thesis fee.
2. Funds generated from Student Fees pursuant to this section may be spent on the intended purpose only. Mandatory fees required of all students or all students in a particular group, regardless of dollar amount, shall be reviewed and approved by the Board of Regents.
- ~~3. Transcript fees do not require Board approval and shall be in an amount that does not exceed the cost of producing the transcript plus postage, including costs for expedited delivery. The cost of production may include salary and other employee costs associated with production.~~

**POLICY PROPOSAL**  
**TITLE 4, CHAPTER 17, *new* SECTION 22**  
Transcript Requests, Exchange and Fees  
**EFFECTIVE DATE: NO LATER THAN FEBRUARY 1, 2017**

Additions appear in *boldface italics*; deletions are [~~stricken~~ and bracketed]

*Section 22. Transcript Requests, Exchange and Fees*

- 1. Institutions shall not charge students a fee for electronic transfers of transcript data between NSHE institutions. Such internal transcript data exchanges are subject to the restrictions governing delinquent accounts pursuant to Section 2 of this chapter.*
- 2. NSHE institutions may establish protocols for the exchange of electronic transcript data for the purpose of facilitating transfer admission, reverse transfer, supplemental enrollment evaluation, graduation, and similar activities provided student consent is obtained in compliance with the federal Family Educational Rights and Privacy Act (FERPA) and NRS 396.535.*
- 3. Institutions may impose a transcript fee without Board approval for requests by students to send printed transcripts from one NSHE institution to another and to send transcripts to non-NSHE institutions or to any other outside entity, including current or prospective employers. Such a fee shall be in an amount that does not exceed the cost of producing the transcript plus postage, including costs for expedited delivery. The cost of production may include salary and other employee costs associated with production.*

RENUMBER SECTIONS 22 THROUGH 28 AS SECTIONS 23 THROUGH 29.

**FISCAL IMPACT OF IMPLEMENTATION:  
NSHE TRANSCRIPT FEE POLICY PROPOSAL**

September 2016

At its Special Meeting on January 22, 2016, the Nevada Board of Regents requested a policy revision to prohibit charging students a fee for transcripts that are exchanged electronically between NSHE institutions. Currently, all but one institution (UNLV) utilize the National Student Clearinghouse (Clearinghouse) for transcript requests for many reasons, including benefits to the student in customer service at a level the institutions cannot consistently provide with existing staff. UNLV is the only institution with a customized transcript request system in place that will require some modification to eliminate the transcript fee for internal electronic transcript requests only, but such modifications will be made if the policy is adopted. The remaining institutions that are utilizing the Clearinghouse are faced with the prospect of eliminating the NSHE transcript fee and the Clearinghouse transaction fee (\$2.25 per transaction request) for internal electronic transcript requests under the proposed policy revision.

Based on discussions with the Clearinghouse, if the policy revision prohibiting student fees for internal electronic transcripts is adopted, the Clearinghouse will be able to offer a technical solution through which students requesting an electronic transcript to be sent from one NSHE institution to another will not be charged any fees, including the Clearinghouse transaction fee. However, the Clearinghouse transaction fee will still need to be paid/absorbed by the institution. If the policy is adopted, institutions will continue to receive revenue from fees charged for non-NSHE transcript requests (less the transaction fees for internal electronic requests).

Under the proposed policy revision, institutions will continue to charge a transcript fee for paper transcripts and requests to send transcripts to non-NSHE entities (e.g. non-NSHE post-secondary institutions, employers, etc.). Such fees may not exceed the cost of producing the transcript plus postage, including costs for expedited delivery. The cost of production may include salary and other employee costs associated with production.

Below is the estimated fiscal impact if the policy revision is adopted, including the revenue loss from not charging an NSHE fee for internal electronic transcript requests and the additional expense of absorbing the Clearinghouse transaction fee for such requests.

<b>Institution</b>	<b><u>Estimated revenue loss for internal, electronic transcripts (annual)</u></b>	<b><u>Estimated cost to the institution for the Clearinghouse's transaction fee for internal electronic transcripts (annual)</u></b>	<b><u>Total Estimated Fiscal Impact (annual)</u></b>
UNLV	\$28,000		\$28,000
UNR	\$11,535	\$3,375	\$14,910
NSC	\$3,534	\$2,650.50	\$6,184.50
CSN	\$14,392	\$9,560.25	\$23,952.25
TMCC	\$11,452	\$1,800	\$13,252
GBC	\$1,875.50	\$1,534.50	\$3,410
WNC	\$4,500	\$5,062	\$9,562
<b>Total</b>	<b>\$75,288.50</b>	<b>\$23,982.25</b>	<b>99,270.75</b>