

TRANSCRIPT DISCIPLINARY NOTATIONS



Guidance to AACRAO Members

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Advancing Global Higher Education

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Executive Summary

AACRAO established the Transcript Disciplinary Notations Work Group in April 2016 in response to growing interest from AACRAO members, new and proposed state legislation, and the increasing public accountability of colleges and universities. The Work Group, comprised of ten AACRAO members who represented diverse institutional types, positions, and geographic locations and chaired by Kristi Wold-McCormick, registrar of the University of Colorado Boulder, was charged with developing guidance regarding the use of disciplinary notations on transcripts.

The Work Group considered:

- Whether there is a Work Group and/or professional consensus regarding placing such notations on transcripts;
- The pros and cons for an institution to consider when deciding about such placement;
- The development of institutional policies and practices, regardless of the decision to post or not post such notations;
- If posting on the transcript, the types of disciplinary infractions that might be noted;
- If posting, options and suggestions for the wording of disciplinary notations;
- The retention and removal of transcript notations;
- Alternatives for providing notifications of disciplinary misconduct or other safety concerns to transfer institutions without the use of transcript notations; and
- FERPA and legal considerations related to disclosures.

Historically, opponents of disciplinary transcript notations have expressed concern that a student's privacy might be compromised if information about an infraction and subsequent sanction is shared with other institutions. While in most cases (some specific exceptions apply) institutions should safeguard a student's protected education record from general release and public exposure, it should be noted that the practice of noting disciplinary sanction on the transcript is legally permissible under the Family Educational Rights and Privacy Act of 1974 (FERPA).

However, the lack of clearly published guidance by AACRAO about its recommendations related to disciplinary notations has resulted in inconsistent practices and professional opinions on this matter. Further, it has led other higher education professional associations to publish position statements regarding transcript notations.

At the time of this publication, two states, New York and Virginia, have legislation mandating that public institutions place notations on transcripts for students who are suspended or dismissed for certain disciplinary violations. Other states, have considered, though not yet passed, similar legislation. Federal legislation mandating transcript notations was introduced late in 2016, but was not acted on before the end of that congressional session.

The guidance and recommendations provided by the AACRAO Work Group primarily focus on student behavioral misconduct. The guidelines are intended to enhance transparency and help standardize practices among institutions of higher

education, as well as promote consistency and fairness for all students involved in violations, victims and offenders alike.

The Transcript Disciplinary Notations Work Group's initial focus was on the issues surrounding the use of disciplinary notations on student transcripts. However, the Work Group quickly recognized that the decision to include or not include these types of notations on transcripts is embedded in the larger question of whether institutions have a responsibility to notify other institutions of potential threats to their communities from students they have suspended/expelled for serious misconduct. The Work Group concluded that institutions do have this responsibility, and once the determination is made that such notification is necessary, the means of notification may take a number of forms, including transcript notations.

Key Recommendations from the Work Group

1. Recognizing that the most egregious acts of misconduct may result in the involuntary separation of the student from an institution, and may indicate a pattern of behavior that might be repeated at a subsequent institution, **some form of notice** should be provided to a receiving institution when a student has committed serious behavioral misconduct (e.g. including, but not limited to, that defined by the Clery Act.)
 - Clery Act crime categories include: Criminal offenses (homicide, sexual assault, burglary, arson, theft, aggravated assault, destruction/damage of property), Hate Crimes, VAWA offenses (domestic or dating violence, stalking), and Criminal Arrests (weapons law violations, drug abuse violations).
2. **The academic transcript is an appropriate means to support communication about serious student misconduct, but may not be the only means of notification.** A student's standing that impacts his or her eligibility to continuously enroll at an institution affects academic progress and, for this reason, is deemed transcript-appropriate.
3. **If a college or university decides not to record disciplinary notations on official transcripts,** the following alternatives might be considered by an institution:
 - Student Conduct Transcript
 - Dean's Certification Letter
 - Transcript Insert
4. As with academic probations and warnings, disciplinary probations and warnings for minor violations that do not result in a mandatory separation from an institution should not be noted on official transcripts or otherwise disclosed to another institution.
5. Institutions should align as closely as possible in their use of standardized terms and definitions for various student sanctions or penalties for misconduct. Such separations are generally denoted by commonly used and understood language, including:
 - *Expulsion or Dismissal* – a permanent separation from the institution.
 - *Suspension* – a temporary separation, often for a specific period of time, from the institution with the option of a possible future return.

6. In cases of suspension, dismissal and expulsion (or the equivalent), transcript notations should include the following:
 - The general type of infraction -- academic or behavioral (e.g. disciplinary).
 - The department responsible for issuing the student separation from the institution (e.g. Office of Student Conduct).
 - Effective dates or date/term ranges of student separation from institution, if applicable.
7. Institutions may record a “Pending Conduct” statement on transcripts while an investigation or hearing is planned or underway. The use of a hold to block the release of an official transcript until the investigation concludes may be preferable, but may also impact service to students.
8. A special notation may be placed on the transcript when a student is permitted to withdraw while an investigation is underway. The standard suspension/expulsion notation should replace this special notation if the student is found in violation of the code and that special notation should be removed if the student is found to not be in violation. The use of a hold to block the release of a transcript until the investigation concludes may be preferable, but may also impact service to students.
9. Transcript notations should be placed at the end of the semester/term in which the sanction occurs. Transcript legends (keys) should offer further explanation, as needed, and provide the reader with instructions on how/where to obtain additional information.
10. All institutions should have comprehensive policies and business processes that clearly document expected codes of student conduct, infractions, institutional review panels, sanctions, due process (appeal hearings), recordation and disclosure practices, and specific verbiage related to the retention and removal of transcript notations.
11. Educational institutions that receive transcripts with disciplinary notations should have comprehensive and consistent admissions procedures in place to handle applicants with active sanctions at other institutions. No institution should apply negative consequences to a student whose record includes a disciplinary notation on his/her transcript without seeking or considering additional information.

I) Work Group Charge

AACRAO established the Transcript Disciplinary Notations Workgroup in April 2016 in response to growing interest from AACRAO members, new and proposed state legislation, and the increasing public accountability of colleges and universities. As some member institutions consider using these notations, and others are required to do so by law, Vice President for Records and Academic Services Lara Medley and AACRAO Executive Director Michael Reilly charged the group to develop guidance regarding the use of disciplinary notations on transcripts. The recommendations from the Work Group and AACRAO are comprehensive, yet are advisory and informational in nature. AACRAO is not a regulatory body, and the ultimate decision about policy and practices related to disciplinary notations or notifications rests with each individual institution, its governing bodies, or its state legislative body.

The Work Group considered:

- Whether there is a Work Group and/or profession consensus regarding placing such notations on transcripts;
- The pros and cons for an institution to consider when deciding about such placement;
- The development of institutional policies and practices, regardless of the decision to post or not post such notations;
- If posting on the transcript, the types of disciplinary infractions that might be noted;
- If posting, options and suggestions for the wording of disciplinary notations;
- The retention and removal of transcript notations;
- Alternatives for providing notifications of disciplinary misconduct or other safety concerns to transfer institutions without the use of transcript notations; and
- FERPA and legal considerations related to disclosures.

II) Work Group Composition

The Work Group was comprised of ten AACRAO members who represented diverse positions, institutional types and geographic locations:

- Kristi Wold-McCormick (Chair), Registrar, University of Colorado Boulder
- Lisa Dougherty, Undergraduate and Graduate Admissions Director, Virginia Commonwealth University
- Susan Hamilton, Assistant Vice Chancellor for Academic and Student Affairs, Rutgers University-School of Medicine
- Brad Myers, recently retired University Registrar, Ohio State University
- Nicole Pellegrino, Registrar and Director of Academic Advising and Success, Wells College
- Bart Quinet, University Registrar, Vanderbilt University
- Hope Reynolds, Senior Director of Enrollment Management and Registrar, Virginia Tech Carilion School of Medicine
- Angeliqe Saweczko, Registrar, University of Calgary
- Tara Sprehe, Interim Dean/Academic Foundations and Connections, Clackamas Community College
- Shawn Sullivan, Director of Student Development, Northcentral Technical College

Work Group members held monthly meetings and reached out to student affairs and student conduct professional associations' leadership in dialogue. To engage members and solicit feedback, members also presented at various national, state and regional meetings, including:

- 2016 AACRAO Annual Meeting
- 2016 AACRAO Strategic Enrollment Management (SEM) Conference
- Rocky Mountain ACRAO, regional meeting, 2016
- Pacific ACRAO, regional meeting, 2016
- Virginia ACRAO, state meeting, 2016
- Association of Registrars of the Universities and Colleges of Canada (ARUCC), 2017
- 2017 AACRAO Annual Meeting

In addition, one Work Group member participated in a national webinar on this topic with a member of NACUA, the National Association of College and University Attorneys.

III) Context

The context for the AACRAO Work Group includes a historical overview of the academic transcript as it relates to non-academic notations; the national movement toward increased accountability and safety on campuses; and related state and federal legislation, including FERPA.

The guidance and recommendations provided by the AACRAO Work Group primarily focus on student behavioral misconduct. While the work group did not reach full consensus on every recommendation, there was general agreement that transcript notations or other means of notification are appropriate when a student with a history of serious misconduct intends to transfer to another college or university. The guidelines are intended to enhance transparency and help standardize practices among institutions of higher education, as well as promote consistency and fairness for all students involved, victims and offenders alike.

In its research and discussions, the Work Group explored the following questions:

- Should colleges and universities be obligated to notify other institutions of potentially high-risk students who plan to transfer to them?
- Should colleges and universities record behavioral transcript notations on official transcripts?
- If so, what is the recommended verbiage for disciplinary notations in order to clearly and concisely convey their meaning to a reader of the transcript?
- If colleges and universities choose not to record behavioral notations on their transcripts, what alternatives exist to inform receiving institutions of potentially high-risk students?
- What are the implications, pros and cons, associated with behavioral transcript notations or notation alternatives, both from student and institutional perspectives?

The Work Group members reached consensus that it would be beneficial if institutions aligned as closely as possible in the use of standardized terms and definitions for various student sanctions or penalties for behavioral misconduct. It is noted that institutional practices and policies also vary in determining sanctions for academic misconduct,

including grading penalties. In some cases, the guidance offered in this document may be applied to cases of academic misconduct (See AACRAO publication *Academic Dishonesty: Developing and Implementing Institutional Policy, 2007*).

A. Historical Overview

Increased mobility of students in recent decades and a growing and more diverse number of institutions to serve them have led to a larger proportion of students transferring among institutions. Along with this rise, not only have college and university registrars had to develop comprehensive business practices to maintain, produce, and transmit official academic transcripts of students to authorized third parties, but admissions officers have had to develop policies and procedures to consistently interpret and make decisions based on the information contained in transcripts received from other institutions. The transcript has long been deemed the primary record of a student's *academic* history, progress and standing with an institution from the time of matriculation to separation.

It has been common practice of registrars to record instances of suspension or dismissal due to low academic performance or substandard grade point averages for a student's classification. Historically, many institutions even recorded notations of *academic* probation or warning on the official transcript. However, that practice began to wane after AACRAO recommended that these less formal sanctions, which do not typically result in a student's involuntary separation from an institution, be recorded only in the institution's official academic record system and/or unofficial transcript. In its 2016 *Academic Record and Transcript Guide* (hereinafter referred to as the *AR&T Guide*), AACRAO defines *good standing* as a "student's eligibility to continue enrollment or re-enroll," (p. 112), and something impacting that status is considered particularly relevant insofar as representation on an academic transcript.

AACRAO publications as far back as the mid-20th century have addressed best practices in the recording and reporting of student disciplinary records. The 1953 publication *A Guide to Good Practices in the Recording and Reporting of Student Disciplinary Records* was jointly published by AACRAO, the American College Personnel Association (ACPA), the National Association of Deans of Women (NADW), and the National Association of Student Personnel Administrators (NASPA). In it, the organizations agreed upon a common practice of noting disciplinary actions on transcripts, with discretion given to the registrar regarding including or withholding them. This support for the recordation practice of disciplinary sanctions appeared in subsequent publications of the association for approximately the next two decades.

The 1965 *Record and Transcript Guide* clearly differentiated between a student's primary disciplinary file, the official educational record, and the transcript. The transcript was defined as, "...an unabridged and certified copy of the educational record with respect to all its references to academic performance." The *Guide* further clarified, "Entries on the official education record showing currently effective disciplinary actions which suspend or dismiss the student or restrict, limit, or condition the student's eligibility to return or re-enroll in the college, automatically become a part of the transcript" (pp. 19-20).

The authors of the 1965 publication considered many of the same issues being discussed today, more than a half century later. For example, they stated that the transcript is to be released only upon the student's request, except that such permission is not required where other educational institutions and governmental agencies request transcripts for official purposes. Further, they advised that employer inquiries are separate and distinct from official transcripts and need not follow transcript specifications. Finally, the authors advocated for standardizing terminology for transcribing purposes, including "good standing," "dismissal," "suspension" and "probation." For example, a recommendation was that academic status signifying low standing with unsatisfactory grades be labeled as "Academic;" e.g., "Academic Dismissal." "When the same status is the result of conduct disciplinary action taken, the status should be labeled as 'Disciplinary Dismissal.'" Alternate language for institutional separation was offered, including "involuntary withdrawal" and "disqualification," among others. It defined probation as, "a middle status between good standing suspension or dismissal."

AACRAO archives produced documents demonstrating the gradual shift away from the aforementioned guidance. The 1969 *Record and Transcript Guide* provided less specific guidance and simply stated, "Each institution of higher education should have a carefully considered policy regarding the information which becomes a part of a student's permanent education record and governing the conditions of its disclosure. This policy should reflect a reasonable balance between the obligation of the institution for the growth and welfare of the student and its responsibilities to society" (p. 18). It further clarified, "Transcripts of educational records should contain only information about academic status, except that disciplinary action which affects the student's eligibility to re-register should be recorded if in accordance with institutional policy. If it is the institution's policy not to record such actions, however, this policy should be indicated on the transcript" (p. 18).

By 1977, three years after the passage of the Family Educational Rights and Privacy Act, as amended, the *AR&T Guide* was modified significantly to reflect changes brought about by FERPA. The only references to dismissal and suspension appeared in the glossary and exclusively focused on academic separations for student failure to maintain academic standards. By 1984, the *AR&T Guide* simply stated, "Disciplinary actions should not be a part of the academic record or transcript" (p.8).

The 1996 edition of the *AR&T Guide*, however, included an entire chapter on "Not Recording Disciplinary Actions on Transcripts." In this chapter, the authors claimed that since the publication of the 1984 statement, "a number of questions have been raised regarding the shift in social behaviors and the responsibility that institutions have to document and report those behaviors.... Divergent views about recording aberrant behavior has created an environment for inconsistent and subjective practices" (p. 25). The publication also contained a reference to case law, including *Schulman v. Franklin and Marshall College*, in which a student filed a complaint requesting injunctive relief against a one-year suspension from the institution. It cited that the courts had been reluctant to interfere with college proceedings on internal discipline. In the aforementioned

case, the court ruled that each college is unique and must self-govern because of different standards, attitudes and values concerning misconduct.

In addition, the 1996 *AR&T Guide* included a reference to a 1992 Inter-association Task Force that endorsed and reaffirmed a 1967 Joint Statement on Student Rights and Freedoms. The Joint Statement advocated that institutions maintain separate academic and disciplinary records, that the transcript only contain information about academic status, and that information from disciplinary files not be available to anyone off campus without the express consent of the student except under legal compulsion or where safety is concerned. The authors of this *AR&T Guide* provided the option for institutions to use a statement, such as “Student is eligible to return unless otherwise noted” on transcripts (pp. 25-26).

To counter the 1996 guidance, C. J. Quann and T. D. Ratcliff published an article in AACRAO’s *College & University* titled “An Argument for and a Case Study of Recording Significant Disciplinary Actions on Student Transcripts,” contending: “disciplinary suspension or dismissal relates precisely to a student’s ability to re-enroll, and it is here that the distinction between ‘academic’ and ‘disciplinary’ record fades.” The article closed with a recommendation that AACRAO, the Association of Student Judicial Affairs (ASJA), ACPA and NASPA appoint a joint task force to study the issues and formulate a uniform policy on the notation of disciplinary suspension and dismissals on student transcripts.

In 1999, such a task force indeed was formed. It met for two years under the leadership of Wanda Mercer, then vice president for student services at Tarleton State University (now associate vice chancellor for student affairs at the University of Texas System). It conducted research, presented, and, in February 2001, published a Position Paper of the Inter-association Task Force on Disciplinary Dismissals and Student Transcript. The task force’s recommendation was that “the student’s academic transcript should include a notation indicating that student is ineligible to return to the institution when the student may not be re-enrolled at the institution.”

Through the 2011 edition of *AR&T Guide*, AACRAO remained consistent in its recommendation against recording disciplinary actions on the official transcript, even those that resulted in a period of separation from an institution. This stance was based on member support and prevailing industry cultural norms. Diverging uses of terminology, inconsistent institutional policies (or lack thereof), insufficient information in transcript notations, and varying interpretations and applications of sanctions for behavioral misconduct across colleges and universities reinforced the recommendation against notating such disciplinary infractions.

These inconsistent practices in recording disciplinary sanctions raised concern among members in that they could lead to unjust and imbalanced treatment of students across institutions and potentially be overly punitive to students found in violation of any campus conduct codes. Also, many records professionals held firm in their beliefs that the transcript is an academic representation of a student’s experience at an institution and should not include non-academic information.

However, professional consensus evolved, and with high profile cases of student misconduct leading to increased pressure for accountability, transparency, and student safety, AACRAO changed its recommendation in the 2016 update of the *AR&T Guide*. “Disciplinary Suspension” or “Ineligibility to Re-Enroll” are now components listed by AACRAO as “Essential” in the database and “Optional” on the transcript, unless otherwise mandated by state law.

Comparison of AACRAO member surveys between 2010 and 2015 demonstrated that while practices changed little over this period, more registrars now favor recording disciplinary ineligibility to re-enroll on transcripts (60% in 2015 compared to 43% in 2010). Full survey results on both official transcript practices and opinions on best transcript practices are included in the 2016 *AR&T Guide* (pp. 71-79).

B. Increased Accountability – Campus Safety

Safety and accountability are significant priorities for campus leaders. At times, student advocacy associations and lawmakers have questioned higher education institutions’ handling of student misconduct. And high profile cases, particularly involving sexual assault, have thrust this issue into the public spotlight. Federal enforcement of Title IX, for example, has resulted in more reports of sexual misconduct involving college students and increased involvement in and oversight by campuses to adjudicate those cases.

While the Work Group did not spend considerable time discussing student conduct hearings vs. the criminal justice system, it is well known that many victims choose not to pursue criminal charges against an accused individual for a variety of reasons. Also, criminal investigations and court proceedings typically take much longer than campus-based disciplinary hearings, and follow formal rules of evidence. With institutions under increasing pressure to take swift and effective measures to end violence, particularly sexual violence and harassment, disciplinary proceedings are the means by which campuses can best ensure that students (victims and alleged perpetrators) receive due process through timely and fair investigations and hearings.

The lack of consistent guidance by AACRAO regarding notifications of disciplinary misconduct to other institutions has resulted in inconsistent practices and diverging professional opinions on the matter. Further, it has led other higher education professional associations to publish position statements regarding transcript notations. In recent years, both the Association for Student Conduct Administration (ASCA) and the American Title IX Association (ATIXA) have issued statements recommending that all institutions place notations on academic transcripts if a student is ineligible to re-enroll as a result of a serious disciplinary action.

State and Federal Legislation:

At the time of this publication, two states, New York and Virginia, had enacted legislation mandating that public and private institutions place specific notations on transcripts for students who are suspended or dismissed for certain disciplinary violations (See Appendix B). Other states, including Colorado,

Maryland, California, Pennsylvania and Texas have considered, though, at the time of this publication, not yet passed similar legislation.

- [New York law](#)¹ requires transcript notations for students found responsible for “crimes of violence,” including but not limited to sexual violence.
- [Virginia law](#)² requires transcript notations for students found responsible for “crimes involving sexual violence” according to an institution’s code, rules or set of standard governing student conduct.
- Laws in both states require notations for students who withdraw while under investigation for violations meeting those criteria or pending a disciplinary hearing.
- Virginia’s law allows for the removal of such notations after a student has “...completed the term of the suspension and any conditions thereof and... has been determined by the institution to be in good standing according to the institution’s code, rules or set of standards governing such a determination.”
- The New York statute requires that expulsions related to crimes of violence, hazing, or other serious violations remain permanently on the transcript.

In December 2016, U.S. Congresswoman Jackie Speier (D-CA) introduced a federal bill to amend the Family Educational Rights and Privacy Act of 1974, and require the notification by educational agencies and institutions of public safety concerns. Speier’s proposed legislation, titled the Safe Transfer Act, specifically called for the withholding of federal funds to any educational agency or institution that fails to disclose, via the transcript, to an official of another educational institution or agency in which the student seeks or intends to enroll, the final results of a disciplinary proceeding that finds a student in violation of any crime of violence. The proposed legislation mandated a five-year minimum for such notations to be included on the transcript, and offered specific language related to pending institutional proceedings for investigations of such alleged acts of violence. This proposed legislation died with the 2016 Congress and would require reintroduction in a subsequent Congress.

As a professional association comprised of higher education experts responsible for maintaining academic records, producing transcripts, and collaborating with student conduct and other professionals on their respective campuses, Work Group members agreed it is important for AACRAO to remain vigilant and proactive on the issue of campus safety and disciplinary notifications. The Work Group acknowledged that public accountability and legislative mandates likely will continue to increase if the association does not provide greater clarity and a more definitive stance in its guidance. Further, it is widely recognized that students often transfer to institutions across states and/or provinces. The passage of numerous state laws or policies regarding disciplinary notations or notifications may result in inconsistent, conflicting, or competing rules, leading to further inconsistency and confusion for students and institutions alike.

¹ <http://legislation.nysenate.gov/pdf/bills/2015/S5965>

² <http://law.lis.virginia.gov/vacode/title23/chapter1/section23-9.2:18/>

C. Family Education Rights and Privacy Act (FERPA)

Historically, opponents of disciplinary transcript notations have expressed concern that a student's privacy might be compromised if information about an infraction and subsequent sanction is shared with other institutions. In some situations, institutions have allowed students to withdraw or agree to not re-enroll in exchange for not sharing the outcome of the campus adjudication process, including not placing a notation on the official transcript. While in most cases (some specific exceptions apply), institutions are obligated to safeguard a student's protected education record from general release and public exposure, the practice of noting disciplinary sanction on the transcript is legally permissible under The Family Educational Rights and Privacy Act of 1974 (FERPA).

FERPA requires institutions to treat disciplinary records as part of the education record. As such, disciplinary records, if created by the institution, are required by FERPA to be recorded and maintained by the institution. FERPA permits colleges and universities to provide education record information, including disciplinary information, to other education institutions under three different scenarios:

1. When a student seeks or intends to enroll, or is enrolled, at another institution. Unless the disclosure is initiated by the student (e.g. via a transcript request), the institution must either make a reasonable attempt to notify the student of this information release or describe such releases as their standard business practice in their FERPA annual notice.
2. When an appropriate professional at an institution feels there is a legitimate "health or safety" threat to the student or other individuals, including at another institution, such a release and the rationale for it must be recorded in the student's record.
3. When a student has been found in violation of a crime of violence or non-forcible sex offense in an institutional disciplinary proceeding, the release can include only the name of the accused student, the violation committed, and the sanction imposed. In fact, this information can be released to anyone.

FERPA does not require such releases, nor does it specify the manner in which such information may be released, but rather leaves those details to institutional discretion.

In general, FERPA does not permit non-consensual disclosure to third parties. Transcripts are also often sent to third parties other than education institutions, particularly prospective employers. The clear industry standard for such releases is only with permission from the student. Note that the "health or safety" exception **could** be applied to the release of appropriate records information to any third party, but only under the narrow circumstances of a legitimate threatening situation. Similarly, an institution **may** release limited information about a student found in violation of a crime of violence or non-forcible sex offense in an institutional disciplinary hearing, but, again, the current industry standard is not to do so to the general public. When an institution provides an alternative or supplemental document as a means of notification in place of a disciplinary transcript notation, the institution may define in its policy and corresponding practice if the document is only released to other higher education institutions where a student intends to transfer.

IV) **Transcript Recommendations**

Recognizing that the most egregious acts of misconduct likely result in the student's temporary or permanent involuntary separation from an institution, and may indicate a pattern of behavior, the Work Group consensus was that some form of notice be provided to a receiving institution. While the majority of the members believe that the academic transcript is an appropriate means to support that communication, the Work Group also acknowledged that alternate means of notification could be similarly effective for this purpose. However, it is important that multiple or complex business processes to accommodate different types of sanctions or notification practices be avoided.

A. Recommended on the Official Transcript

The transcript historically has been viewed, first and foremost, as an academic document or record. A student's standing that impacts eligibility to continuously enroll at an institution affects academic progress and, as such, is deemed transcript-appropriate. It is a common practice of registrar professionals to place notations on transcripts when a student has a required separation from, and is deemed ineligible to enroll in, an institution for not meeting minimum academic standards. It is recommended that this same practice be followed when there is a required student separation from an institution for behavioral or other reasons.

Institutional separations generally are denoted by commonly used and understood language, including:

- *Expulsion or Dismissal* – a permanent separation from the institution. Examples: Sanctions imposed on the most serious and egregious disciplinary or academic infractions, such as sexual assault or other violent acts, including those defined in the Clery Act, major property damage, falsification of data in degree-related research projects, and other serious crimes that may be tried in criminal court.
- *Suspension* – a temporary separation, often for a specific period of time, from the institution with the option of a possible future return. Examples: Sanctions imposed on violations that do not result in intentional personal injury and are not considered serious criminal acts. Examples include vandalism, alcohol/drug violations (that do not cause harm to others), petty theft, etc.

Institutional business processes that ensure timely and secure notifications and notation placement must be developed and coordinated between student conduct administrators and registrar staff.

B. Not Recommended on the Official Transcript

It is recommended that disciplinary probations and warnings for violations that do not result in an involuntary separation from an institution not be formally noted on official transcripts. This recommendation is consistent with the practice

of not formally noting academic probations and warnings on official transcripts since they do not ordinarily result in a required separation.

Colleges and universities may display these less formal sanctions on unofficial transcripts that are primarily intended for student and institutional use, or through the use of other indicators or flags in the student information system.

- *Probation* - imposing tasks, restrictions, and expectations on a student to return to good standing.

Examples: Informal sanctions for violations of codes of conduct that result in the student being monitored by university officials for a definite period of time and/or until certain conditions are satisfied by the student (initial alcohol violations, minor plagiarism, etc.).

- *Warning/deferred probation/deferred suspension* - on notice by the institution only.

Examples: Notice that a student may be placed on probation or suspension/expulsion if certain patterns of behavior continue or minor violations of conduct code recur.

- *Not in Good Standing* – still eligible to remain enrolled with or without restrictions.

Examples: Student may remain enrolled in classes (perhaps in online courses only), but may not participate in select co-curricular activities, hold leadership positions, live in campus housing, etc.

A note about the term “Good Standing.” The term “good standing” is widely used in higher education and with a variety of meanings. Many institutions refer to “good standing” as simply the *eligibility for the student to continue to be enrolled or register for classes*, even if on some type of probation or warning. Other institutions refer to a student in “good standing” *if they have at least a 2.00 grade-point-average*, since that is typically considered the minimum GPA to graduate and/or maintain enrollment. This Work Group didn’t address definitions related to “good standing” but would recommend that if an institution uses that term on a transcript, that the term be clearly defined in the transcript legend.

Student judicial processes and associated sanctions are intended to foster learning and promote responsible behavior, not to be overly punitive. The transcript is used for purposes beyond just transferring to other institutions of higher education, such as employment. Notations for minor violations, especially if never removed, may create long-term negative consequences for students.

V) **Recommended Disciplinary Notations Verbiage**

In order to accurately define student’s current standing with an institution, transcript notations should be clear and concise, with the intent to alert the receiving institution or reader that additional information exists which may be useful in making a decision. The

notation should not provide specific details about the infraction, but rather serve as notice that information may be requested by or about the applicant before a final admission decision is made.

A. Suspensions, Expulsions and Dismissals

In cases of suspension, dismissal, and expulsion (or the equivalent), it is recommended that transcript notation phrasing includes the following information:

- The general type of infraction -- academic or behavioral (e.g. disciplinary).
- The department responsible for issuing the student involuntary separation from the institution (e.g. student judicial affairs) or the general set of rules or conduct code of which the student was found in violation.
- Effective dates or date/term ranges of student involuntary separation from institution, if applicable. Providing dates or timeframes benefit the reader in making evaluative decisions that may lessen restrictions on student educational and/or employment opportunities after a suspension period has lapsed. This is particularly important when the recording institution does not have a standard practice to remove such notations.

Alternatively, an institution may include a notation indicating that student is ineligible to return to the institution, along with the general code violated (academic or conduct) or department responsible for issuing the involuntary separation and effective date and date/term range, if applicable.

Examples of behavioral transcript notations include, but are not limited to, the following:

- <Suspended, expelled, dismissed, withdrew while under investigation> for a violation of <institution's specific code, rules or standards>, effective date or date range.
- By action of Student Conduct, student is <suspended, expelled, dismissed> (effective date or date range).
- May not enroll for disciplinary reasons; Eligible to return (date or term/year).
- May not register for non-academic reasons (effective date or date range).
- Disciplinary <suspension, expulsion, dismissal> by <Committee on Student Misconduct>. Eligible to return (date or term).
- <Suspended, Expelled, Dismissed> for violation of the <Student Code of Conduct>, effective date or date range.
- Judicial <suspension, expulsion, dismissal>, effective date or date range.
- Ineligible to return to the institution, <Dean of Students>, effective date

It is strongly recommended that specific details regarding the infraction not be recorded on transcripts (i.e., alcohol violation, sexual assault, vandalism, hazing, plagiarism).

B. Investigation/Adjudication Pending

Institutions may record a *Pending Conduct* statement on transcripts while an investigation or hearing is planned or underway. However, to minimize risk to

students who ultimately are found not in violation, the use of a hold to block the release of an official transcript until the investigation concludes may be preferable.

Institutional student conduct officers must determine if the student under investigation poses a safety risk to the campus while the discovery process is underway. When making this determination, a decision must be made as to whether the student is permitted to continue attending classes or not. If the student is permitted to remain enrolled, but is prevented from attending classes during the investigative process, consideration must be given to the anticipated duration of the investigation, the point in the semester in which the alleged infraction became known, and what the enrollment and record impacts might be upon closure of the investigation. For example, if the process is anticipated to take several weeks or months (as opposed to days) and if the infraction occurred early in the term, a student may be advised to withdraw because, if found not in violation, making up coursework later in the term may prove overly burdensome. In the event the student is found in violation of the student code, whether they were permitted to attend classes or not, the institution must have a clear process for determining the effective date of administrative withdrawal and/or tuition refund, if applicable. If the student is not permitted to attend classes and is found not in violation, the institution may feel an obligation to advocate for the assignment of incomplete grades at the close the term so that the student has additional time to complete necessary coursework. All of these factors should be considered when deciding whether the institution wants to record *Pending Conduct* notations on the transcript.

In such cases when a final decision has not yet been reached by an institution, it is important that any notation on the transcript be clearly marked as “pending,” “under investigation,” or other similar wording. Officials of an institution receiving such a transcript should not finalize any conclusions while the case is pending -- certainly not without additional research into the circumstances involved. When a final decision has been reached, it is important to clearly communicate to any institution that had already received a transcript the outcome of the investigation.

As noted earlier, FERPA allows institutions to release information to other institutions where a student seeks or intends to enroll even after an initial transcript or notification is sent. As such, it may be prudent for an institution not to disclose any pending information until after final adjudication results are released. If the student is not found in violation, then no further action is required. When a student is found in violation, an institution may enact its rights under FERPA and notify any other institution where a student requested a transcript be sent. This requires a consistent and established business process as well as the functionality in systems where such historical transcript order history is stored and may be queried.

C. Student Withdrawal While Under Investigation

A special notation may be placed on the transcript when a student is permitted to withdraw while an investigation is underway. It is recommended that the standard suspension/expulsion notation replace this special notation if the

student is found in violation of the code or that the special notation be removed if the student is found to not be in violation. As with pending investigations, the use of a hold to block the release of a transcript until the investigation concludes may be preferable.

Student conduct administrators have expressed concern that students are sometimes encouraged by attorneys, family members or others to withdraw and/or transfer before sanctions are imposed and transcripts noted by an institution. It is important to note that even if this occurs, FERPA permits the subsequent disclosure of academic record information, without student consent, to institutions where a student seeks or intends to enroll. This disclosure may take place through the issuance of an updated transcript or other type of notification from the sanctioning institution (e.g. from the Student Conduct Office to the Office of Admission or Student Conduct Office at the receiving institution), even after the student has already transferred or applied to transfer.

Most registrars' offices utilize information systems that allow the sanctioning institution to track the history of transcript orders. In addition, other services, such as that of the National Student Clearinghouse, may be used to verify if a student has subsequently enrolled at another institution. In either case, the student should be informed in a timely fashion that an updated transcript or notification is being provided to the receiving institution(s), unless this practice is otherwise stated in the institution's FERPA policy.

Institutions that do not permit students to initiate a formal withdrawal during this investigation period must have clear protocols for handling withdrawals once investigations conclude, including how to set effective withdrawal dates, record impacts (e.g. "W" marks and/or withdrawal statements), disciplinary transcript notations and how refunds are determined.

At the close of an investigation, institutional policies and procedures should include whether a student must request a withdrawal or if the institution automatically performs administrative withdrawals in cases that result in suspension and expulsion. It is recommended that institutions process administrative withdrawals on suspended/expelled students to prevent grades from lapsing to failures. There may be legal question as to whether an institution can refuse to allow a student to withdraw during an investigation.

Note: Some state laws may require the recording of notations on transcripts while investigations are pending and/or when a student withdraws during an investigation.

D. Transcript Notation Placement and Transcript Key

To promote consistency and ease in the identification of transcript notations for admissions processors and other readers of the record, it is recommended that notations be placed at the end of the semester/term in which the sanction occurs. For institutions that are not able to add notations to the end of a term due to system limitations, notations should be recorded either after the cumulative statistics at the end of the transcript or in another consistent and prominent location, along with applicable effective dates.

In addition, institutions utilizing electronic data exchange as a means to transmit student academic record data electronically (via EDI or XML standards) should utilize a status reason code to identify student standing and/or include a note or special instruction to indicate the disciplinary sanction.

Transcript legends (keys) should offer further explanation on sanction definitions, as needed, and provide the reader with instructions on how/where to obtain additional information. If possible, the key should reflect when the institution began recording disciplinary notations, if it uses an alternative means of notification to the transcript, or if does not provide any notation or notification in cases of involuntary separation from the institution. For example, “for more information on disciplinary notations, contact <Student Conduct Office> or <Dean of Students Office> at (phone and/or email).”

E. Degree Revocation

On the occasion when an investigation takes place and a sanction is imposed after a degree has been awarded, an institution may revoke a degree, per established academic policies and procedures. It is recommended that degree revocation only be considered when it is proven that the violation occurred while the student was still enrolled at the institution or prior to the degree being awarded. A retroactive behavioral suspension or expulsion notation may be included, and a system notation or flag should be used that allows administrators to understand why a degree was not awarded when academic requirements were completed. Institutions may also delay the posting of a degree until an investigation has concluded.

If a student is permitted to graduate or retain a posted degree, but is not allowed to re-enroll at the institution after being found in violation of the student conduct code, it is appropriate to make a notation to this effect on the transcript or supplementary document.

VI. Recommended Alternatives to Transcript Notations

Despite the recent change in stance by AACRAO and increased pressure to report serious student conduct violations to other institutions, some college and university administrators may either decide or be mandated (e.g. by state, institutional or other governing bodies) **not** to record such notations on official transcripts. The AACRAO Work Group concluded that some form of notification, whether in the form of transcript notation or other formal notice, be provided to institutions where a student seeks or intends to enroll.

Alternative notifications to the transcript may be preferable when a student has been excluded or administratively withdrawn from an institution while an investigation is pending because, in some cases, a student may ultimately be cleared of misconduct allegations.

To minimize risk and liability related to not providing information to other higher education institutions about students who are found in violation of campus codes of conduct, the following alternatives to disciplinary notations on transcripts may be considered by an institution:

- Student Conduct Transcript – Such a document may either accompany an official transcript or be sent to the receiving institution (admissions or student conduct office) as a follow-up to the official transcript by the appropriate student conduct authority at the sanctioning institution. The institution should establish a protocol under which the student conduct office is notified that a student with an appropriate conduct record has submitted a transcript request.
- Dean’s Certification Letter – A standard business practice could include the issuance of a form letter from the dean of students or appropriate person (system generated or otherwise), along with the official transcript, to receiving institutions that verifies the current non-academic standing of a prospective transfer student to the sending institution.
- Transcript Insert - An insert may be included with the official transcript indicating that the student has a conduct record with the sending institution along with the contact information for the appropriate authority.

Holds or *Flags* in the campus SIS are system indicators that may be set-up and used to inform a transcript processor that a student has an active conduct record. When this flag appears, it alerts the processor to check if the requested transcript is being sent to another institution where the potentially seeks or intends to enroll. Either a standardized supplementary document could be enclosed with or attached to the official transcript by the processor, or the appropriate student conduct official on campus could be alerted to determine the necessary action, including notification, based on the student’s case. Flags or holds could also serve as an indicator to withhold the release of an official transcript until a pending investigation has concluded. The administrative authority to place and release specialized holds may be Student Affairs, Dean of Students, Student Conduct Officer, Title IX Office, etc.

Again, FERPA permits non-consensual disclosure, however, this exception only applies to other higher education institutions where a student seeks or intends to enroll, and not to employers or other third parties.

Alternative notifications to transcript notifications should involve coordination between registrar and student conduct offices on campus, as well as technical staff who help support student information systems, as necessary. Detailed business processes should be developed among the offices and systems involved to ensure that the disciplinary information is appropriately disseminated, and that students are treated consistently and fairly. Finally, if such alternative notifications are used to provide notice to other institutions of higher education, this practice should be clearly published both in student conduct policies and transcript ordering instructions available to students.

VII. Disclosure Timeline/Retention of Notation

It is recommended that institutions have transparent policies and business practices regarding the retention and removal of various sanctions and disciplinary notations. For example, suspensions typically imply temporary separations from an institution (e.g. minimum of one term and/or maximum of five years) , whereas expulsions and dismissals often apply to permanent or long-term separations.

It also is important that there are systems and processes in place to track active sanctions and effective time periods in order to facilitate the removal of disciplinary notations or notifications. Most systems do not remove these standing codes or transcript notes

automatically. As such, either the student conduct or registrar staff should have an established business process, tracking software, or shared system or logs to record and monitor the application, update, or removal of sanctions on academic records and transcripts.

The removal of disciplinary notations should clearly be defined in institutional policies and/or conduct codes. For example, notations are automatically removed after a suspension period has lapsed or may only be removed after a student has satisfied any additional conditions imposed as part of the sanction (e.g. required trainings, counseling, meetings with student conduct administrators, community service). The monitoring and removal of notations should be closely coordinated between student conduct administrators and registrar staff.

It is recommended that students not be required to individually request the removal of notifications after fulfilling a suspension period. Some students may forget, others may not understand what is required of them, and others yet may be reluctant to contact the institution to initiate this request. As such, putting this responsibility on the student can result in inconsistent treatment of students and education records. Rather, what will be recorded on student records (or supplemental documents), whether special conditions must be met as part of the suspension protocol (and if so, what the conditions are), and when/how/by whom the notation will be removed, if applicable, should be clearly communicated to students in the student conduct code and as part of the sanctioning process. The same processes for automatic or conditional removal should also apply to students who do not intend to re-enroll at the institution in a future term.

A similar practice also should exist for background checks of student standing required by theological, legal, or other institutions seeking character information on prospective students or members. After a notation is removed and the case or sanction is no longer consider active, historical information on disciplinary history should no longer be released or reflected in background check verifications.

It is less common for institutions to allow the removal of an expulsion notation from a transcript. However, a process may be established for a student to request its removal after a significant period of time has lapsed and/or if institutional codes of conduct have changed over time and the infraction is no longer similarly sanctioned for current students.

Finally, it is recommended that the registrar also include in transcript ordering instructions, catalogs and related sites, and publications such as catalogs, that official transcripts may include active disciplinary sanctions or that supplemental documents regarding active sanctions are released to other post-secondary institutions.

VIII. Recommended Framework for Institutional Policies and Procedures

To ensure consistency, transparency and fairness for all students, including those found in violation of campus codes of conduct, it is strongly recommended that all institutions have comprehensive policies and business processes that clearly document codes of student conduct, infractions and institutional review panels, sanctions, due process (appeal hearings), and recordation and release practices. At institutions where multiple authorities exist for reporting, adjudicating, and determination sanctions (e.g., general student misconduct v. Title IX violations v. academic misconduct), the distinction

between these entities and the types of violations that fall under the purview of each should be made clear in published policies. These policies should be promoted throughout a student's career at an institution. The desired outcomes are consistency, due process, fairness, and transparency.

The characteristics, history, mission, culture, and climate of each institution undoubtedly influence the types of infractions deemed sanctionable by the institution. At a minimum, however, the following items should be included in each institution's policy or code of student conduct.

- Code of Conduct Considerations - Definition of terms
 - Specific terminology and definitions for different types of infractions and sanctions (Definitions that may easily be understood by all parties -- students, staff, administrators, faculty -- and can be subjectively interpreted. Is the language legalistic or developmental?)
- Responding to Inquiries/Disclosures
 - Individuals, offices, or committees that respond to inquiries from institutions that receive transcripts or notifications with disciplinary information should be identified;
 - Circumstances under which disciplinary actions and sanctions are disclosed;
 - Whether disciplinary records are sealed and no longer available for disclosure after a period of time;
 - How information is relayed to receiving institutions (letter, phone call);
 - How the history of such exchanges is recorded.
- Investigations and Due Process Considerations
 - Clear decision-making processes that define who has authority (Conduct officer, Dean of Students, Committee, etc.);
 - How an investigation is handled;
 - Timeline for the investigation and hearing;
 - Whether students are involved in their own cases;
 - How decisions are rendered;
 - How and by whom the student is notified of the outcome;
 - Whether a student may attend classes during an investigation; If not, how instructor notification is handled;
 - Whether a student may withdraw during an investigation and/or whether a student is administratively withdrawn upon involuntary separation from an institution;
 - Whether a student is subject to a refund and what the record impacts will be based on the time of semester ("W's" and withdrawal statements);
 - Instructions on the appeal process (conditions/procedural grounds), including who hears appeals and what impact appeals have on the sanction.
 - Whether a student may remain enrolled while appealing a decision.
- *Record Impacts/Notations:*
 - Infractions that result in a transcript notation or other notification;
 - Specific wording that appears in records;
 - Whether the transcript or information is released to other institutions during an investigation;
 - How/when imposed sanctions are relayed from student conduct office to the registrar;
 - If the sanction is denoted differently on the unofficial transcript available to students and advisors, etc.;

- o Whether there is a record impact/notation during an appeal process;
- o The retention of notations or release of supplemental documentation for each type of sanction (permanent v. temporary?);
- o When/how notations are removed after a suspension period has concluded, if applicable;
- o Whether the student must initiate such a request or if it is automatic;
- o Whether additional conditions must be met before it is removed.

Note: It is recommended that institutions establishing new policies and processes related to disciplinary sanctions **not** make notations on transcripts retroactive to the new policy effective date.

IX. Admission Policies, Procedures, and Considerations

The consideration of whether to include notations on academic transcripts is relevant only because the recipient may act upon them. Regardless of legislation requiring notations on academic transcripts about previous activity or pending investigations, an educational institution receiving such transcripts should have procedures in place to address the handling and treatment of students with such notations.

Even if an institution does not place disciplinary notations on its own transcripts, nearly every institution receives transcripts with such notations from applicants. Transcript notations typically do not provide sufficient information to distinguish the nature or severity of the disciplinary action. In order to not misjudge students or make decisions based on incomplete information, it is recommended that each institution have a documented process in place to address this issue.

First and foremost, it is recommended that no institution apply negative consequences (e.g. no consideration of an application or automatic denial for admissions) to a student whose record includes a disciplinary notation on his/her transcript without seeking and considering additional information. No applicant should be presumed “inadmissible” simply based on such a transcript notation or other notification of misconduct. It is recognized that there may be significant variability among institutions as to what constitutes a violation of their student code.

Open access institutions (e.g. community colleges) may not require or collect transcripts from students intending to enroll at their institutions. It is recommended that open access institutions consider developing a notification process with their four-year partner institutions (see section VI for suggested processes) or consider adding, “Are you eligible to return to your previous institution?” on the admission application.

Receiving institutions’ decisions about who follows up with the sanctioning institution may be based on agreed-upon procedures, anticipated volume, and expertise among offices. For example, one institution may decide that the student conduct or judicial affairs (or equivalent) office be responsible for requesting additional information on an applicant, whereas another may decide that the admissions office do so. An institution may want to consider this as a process parallel to that followed for students who acknowledge a criminal history on an application for admission.

Further, it is recommended that at least an initial review of admissibility be conducted without any consideration for the disciplinary notation. If the student is otherwise admissible, additional information should be requested for admission consideration.

Important questions to ask and formalize in campus admissions policies and procedures include, but are not limited to, the following:

- Should additional information be solicited directly from the applicant? If so, who requests that information?
- Should additional information be solicited from the previous institution? If so, who requests that information?
- With the additional information, should there be an initial review to discern whether the seriousness of the circumstances that led to the disciplinary notation are strong enough to warrant further review, or are they such that the applicant can move forward in the regular admissions review process?
- Does the amount of time that has lapsed since the imposed sanction affect the admission decision? Does it make a difference if the suspension period has concluded or if it is still active?
- If the circumstances are serious enough to warrant further review, should the review be done by a committee? If so, who should serve on the committee (i.e., admissions, registrar, student life/judicial affairs, counseling, legal affairs, police/campus safety, other students)?
- What additional documentation/information is necessary for admission consideration?
- Should the applicant be interviewed (either administratively and/or by a committee)?
- If deemed admissible, are there certain conditions or requirements imposed on the student upon or prior to matriculation? Who is responsible for monitoring or enforcing such conditions? Do they result in a conditional or probationary admission status?
- If a previously suspended student seeks readmission to an institution, what are the standards and procedures?

Note: The Work Group was aware of the national *Beyond the Box* initiative that is focused on helping colleges and universities remove barriers for students with criminal records from pursuing higher education. While both the disciplinary notations and the *Beyond the Box* guidance support more holistic reviews of applicants, the application for admission and prospective student records were not specifically in the scope of the Work Group's charge.

X. Summary of Key Recommendations

The Transcript Disciplinary Notations Work Group's initial focus was on the issues surrounding the use of disciplinary notations on student transcripts. However, the Work Group quickly recognized that the decision to include or not include these types of notations on transcripts is embedded in the larger question of whether institutions have a responsibility to notify other institutions of potential threats to their communities from students they have suspended/expelled for serious misconduct. The Work Group concluded that institutions do have this responsibility, and once the determination is made that such notification is necessary, the means of notification may take a number of forms, including transcript notations.

1. Recognizing that the most egregious acts of misconduct may result in the involuntary separation of the student from an institution, and may indicate a pattern of behavior that might be repeated at a subsequent institution, **some form of notice** should be provided to a receiving institution when a student has committed serious behavioral misconduct (e.g. including, but not limited to, that defined by the Clery Act.)
 - Clery Act crime categories include: Criminal offenses (homicide, sexual assault, burglary, arson, theft, aggravated assault, destruction/damage of property), Hate Crimes, VAWA offenses (domestic or dating violence, stalking), and Criminal Arrests (weapons law violations, drug abuse violations).
2. **The academic transcript is an appropriate means to support communication about serious student misconduct, but may not be the only means of notification.** A student's standing that impacts his or her eligibility to continuously enroll at an institution affects academic progress and, for this reason, is deemed transcript-appropriate.
3. **If a college or university decides not to record disciplinary notations on official transcripts,** the following alternatives might be considered by an institution:
 - Student Conduct Transcript
 - Dean's Certification Letter
 - Transcript Insert
4. As with academic probations and warnings, disciplinary probations and warnings for minor violations that do not result in a mandatory separation from an institution should not be noted on official transcripts or otherwise disclosed to another institution.
5. Institutions should align as closely as possible in their use of standardized terms and definitions for various student sanctions or penalties for misconduct. Such separations are generally denoted by commonly used and understood language, including:
 - *Expulsion or Dismissal* – a permanent separation from the institution.
 - *Suspension* – a temporary separation, often for a specific period of time, from the institution with the option of a possible future return.
6. In cases of suspension, dismissal and expulsion (or the equivalent), transcript notations should include the following:
 - The general type of infraction -- academic or behavioral (e.g. disciplinary).
 - The department responsible for issuing the student separation from the institution (e.g. Office of Student Conduct).
 - Effective dates or date/term ranges of student separation from institution, if applicable.
7. Institutions may record a "Pending Conduct" statement on transcripts while an investigation or hearing is planned or underway. The use of a hold to block the release of an official transcript until the investigation concludes may be preferable, but may also impact service to students.
8. A special notation may be placed on the transcript when a student is permitted to withdraw while an investigation is underway. The standard suspension/expulsion notation should replace this special notation if the student is found in violation of the code and that special notation should be removed if the student is found to not be in violation. The use of a hold to block the release of a transcript until the investigation concludes may be preferable, but may also impact service to students.
9. Transcript notations should be placed at the end of the semester/term in which the sanction occurs. Transcript legends (keys) should offer further explanation, as

needed, and provide the reader with instructions on how/where to obtain additional information.

10. All institutions should have comprehensive policies and business processes that clearly document expected codes of student conduct, infractions, institutional review panels, sanctions, due process (appeal hearings), recordation and disclosure practices, and specific verbiage related to the retention and removal of transcript
11. Educational institutions that receive transcripts with disciplinary notations should have comprehensive and consistent admissions procedures in place to handle applicants with active sanctions at other institutions. No institution should apply negative consequences to a student whose record includes a disciplinary notation on his/her transcript without seeking or considering additional information.