

RESEARCH BRIEF:  
HOW SCHOOL-BASED EDUCATIONAL FINES AND FEES  
POLICIES HARM HIGH SCHOOL GRADUATION  
SPRING 2026

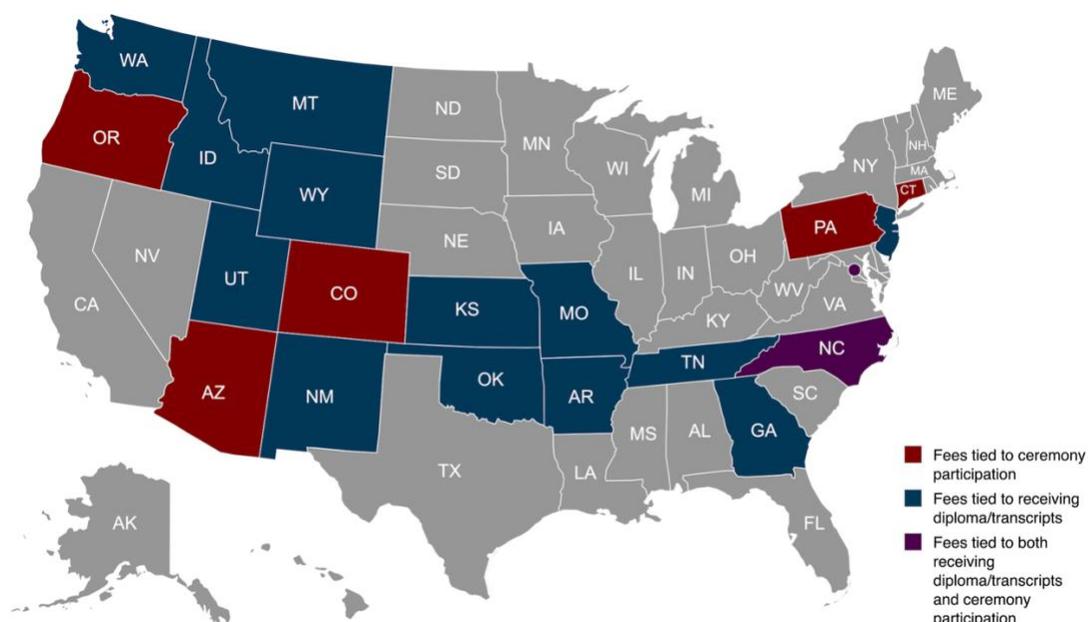
---

**SUMMARY.** *Research shows that school-based educational fines, fees, and costs, e.g., economic sanctions, can limit students’ access and opportunity across a range of educational, health, and economic measures. Using data collected from publicly published district policies (2024-2025 school year) of the two largest school districts by population for all 50 states and the District of Columbia, this study examines the wide range of barriers and restraints that school-based educational fines and fees place specifically on high school graduation, including withholding diplomas, grades, and transcripts as well as barring students from participating in commencement ceremonies. Results affirm prior research as to the national prevalence of school-based educational fines and fees and add a new dimension to the growing evidence base of the harms of such economic sanctions. The findings of this brief contribute not only to the fields of education and economic justice, but highlight the need for national, state, and local law and policy reforms to promote high quality, free, and equitably accessible educational opportunities.*

---



**Figure 2. States with School-Based Fines and Fees Provisions in District Policies that Impact Graduation**



## **School-Based Educational Fines and Fees Policies: A Limit on Education Access and Opportunity**

School-based educational fines, fees, and charges are economic sanctions, e.g., monetary costs, imposed on students, parents, and caregivers in K-12 public schools<sup>2</sup> and operate two ways.

First, they serve to sanction students, parents, and caregivers and deter and economically punish specific behavior(s). For example, at Memphis-Shelby County Schools in Tennessee, fines are imposed on all students for late-returned library books, and no limit is imposed for how much in fines a student could accrue.<sup>3</sup> In Arizona’s Chandler Unified School District, parents and caregivers are charged \$1 fee per minute per student for late student pick up.<sup>4</sup>

Second, they serve to require students, parents, and caregivers to cover educational costs in order to access the most basic of necessities, the required curriculum. For example, Indiana’s Indianapolis Public Schools provides that all students are to be charged a rental fee for their textbooks.<sup>5</sup> Cincinnati City School District plainly collects student fees annually to “pay for part of the cost of essential classroom materials” and

such fees are assessed on the family's income and number of children enrolled in Cincinnati public schools.<sup>6</sup>

Like economic penalties in civil and criminal contexts, school-based educational fines and fees often operate simultaneously, creating a compounded cycle of debt, punishment, and exclusion—or “*double burden*.”<sup>7</sup> For example, in Salem-Keizer School District (Oregon), schools may charge students fees for textbook rental, “supplies or materials above and beyond the requirements necessary to obtain the highest grade possible and credit in any course offering,” and in the event of non-payment, restrict the student from participating in co-curricular or extracurricular activities.<sup>8</sup>

## **The Importance of High School Graduation**

It is well accepted that high school graduation is associated with short- and long-term individual and community benefits. As medical and health sciences research has evidenced, education is a key social determinant linked to positive health. For example, high school graduation increases a person's lifespan by 6 to 9 years.<sup>9</sup> High school completion is also associated with positive physical health outcomes, higher self-reported health, diminished psychosocial stress, and overall healthier behaviors.<sup>10</sup>

For students who do not graduate from high school, negative health patterns and outcomes are evidenced in multiple studies. They are at increased risk, for example, to experience poor mental health outcomes, chronic disease, and lower life expectancy—which become exponentially compounded with entry into the school-to-prison pipeline.<sup>11</sup> Additionally, studies show that high school graduation and the resulting level of educational privilege and educational attainment correspond with economic stability and higher socioeconomic status for both themselves and intergenerationally. Students with a high school diploma earn higher incomes,<sup>12</sup> are more likely to be able to attend college,<sup>13</sup> and experience decreased risk for experiencing poverty.<sup>14</sup> Given the key significance of high school graduation across a person's lifetime, decades of policy and practice have focused on ending structural and systemic barriers to graduation to promote increased educational and economic opportunities.

## **School-Based Educational Fines and Fees Provisions: Direct and Indirect Barriers to Graduation**

Data from this study confirms that in 29% of states and the District of Columbia, public school-based educational fines and fees policies create multiple barriers to graduation for eligible and qualified students—with variation across the 15 jurisdictions. For example, North Carolina's Charlotte-Mecklenburg Schools policy provides that both “a student's participation in graduation or promotion ceremonies will be denied” and “[d]iplomas will be held for students owing fees until delinquent fee is paid,” which

could have the impact of preventing students from accessing higher education because they are not able to substantiate that they earned their degree.<sup>15</sup>

In addition to direct restrictions on graduation, six states and the District of Columbia, public district policies bar against an eligible and qualified student from participating in their commencement ceremony until any and all outstanding balances are paid. The Albuquerque Public Schools (New Mexico) provision, for example, provides “[a] student may be prohibited from participating in the school’s graduation exercises until all financial obligations are met.”<sup>16</sup> Not limited to one specific educational fine or fee, the Albuquerque Public Schools takes effect for multiple fines and fees.<sup>17</sup> The policies in Mesa Public Schools (Arizona),<sup>18</sup> New Haven Public School (Connecticut),<sup>19</sup> and Salem-Keizer School District (Oregon)<sup>20</sup> all also contain similar provisions.

In 18 school districts, school-based educational fines and fees, for example, may result in a student’s report card, transcripts, and grades being withheld,<sup>21</sup> thus limiting their ability to enroll in higher education. Such a provision is set forth in the Billings Public Schools (Montana) policy which provides that in addition to the withholding of a diploma and transcripts for failure to pay, report cards and grades will also be “withheld until formal notice that the obligation has been met.”<sup>22</sup> A similar policy exists in New Haven Public Schools (Connecticut) which allows for the withholding of “a student’s report card, transcripts and grades” for failure to pay for the cost of lost or damaged textbooks and library books.<sup>23</sup> The Boise School District (Idaho) policy requires students to pay all fees before the student may graduate or be issued their “report card, diploma, certificate, or transcript”<sup>24</sup> and Newark Public School District (New Jersey) contains a provision allowing a student’s diploma and transcripts to be withheld until all fee payments are made.<sup>25</sup> In Jefferson County (Jeffco) (Colorado) Public Schools the policy provides for withholding of a student’s transcript when a transcript fee is not paid.

## **Policy Protections for Students and Families**

In 36 states and the District of Columbia, public school district policies present some form of limited waiver or exception provision for school-based educational fines and fees. Consistent with analysis of the provisions for application, form, and scope, these 44 policy provisions vary in scope with 3 key findings.

- No district sets forth a categorical waiver or protections from all school-based educational fines and fees for all public-school students.
- 20 districts condition the waiver of school-based educational fines and fees based on student enrollment in a free or reduced school lunch program.

- 21 districts do not provide information or instructions on when or how those waivers apply to students or how to access any available waiver that may apply.
- 7 districts require students and families to apply for a waiver with each school year.

For example, Milwaukee Public Schools (Wisconsin) only waives school fees for students experiencing homelessness.<sup>27</sup> Springfield Public Schools (Missouri) does provide a waiver for athletic fees to those on free and reduced lunch but does not waive activity fees associated with clubs, labs, and music activities.<sup>28</sup> Further, under the Wichita Public Schools (Kansas) policy students who qualify for a waiver are only eligible for a proration based on their status under a free and reduced lunch policy.<sup>29</sup> Under the Cranston Public School District (Rhode Island) policy, students may receive a one-time exception to the lunch fee if a building administrator provides the student with a signed note that the student must then present to the cashier at lunch.<sup>30</sup>

---

**Authors:** Thalia González is the James Edgar Hervey '50 Chair of Litigation and Professor of Law and UC Law SF. She is Faculty Co-Director of the Center for Racial and Economic Justice at UC Law SF. Quinn Chappelle (JD, anticipated 2027) is a Research Assistant in the Center for Racial and Economic Justice.

**Citation:** Thalia González & Quinn Chappelle, *Research Brief: How School Based Fines and Fees Policies Harm Graduation*, Center for Racial and Economic Justice, University of California College of the Law, San Francisco (2026).

**About the Center for Racial and Economic Justice at UC Law SF:** The Center for Racial and Economic Justice (CREJ) works to advance equity and justice through legal education, research and scholarship, and academic-community partnerships and collaborations. To learn more about CREJ visit:  
<https://www.uclawsf.edu/academics/centers/center-racial-economic-justice/>.

---

1. As collection was limited to analysis of district policies of the two largest schools based on student enrollment, this study does not confirm the lack of any district policies in the states of Illinois and New York with fine and fee provisions. The state of Hawaii has one public school district and thus was the only district analyzed for the state. This district includes all public schools across the Hawaiian islands.

2. Thalia González, *FAQ: Educational Fines and Fees in K – 12 Public Schools*, Center on Racial and Economic Justice, University of California College of the Law, San Francisco (2025).

3. MEMPHIS-SHELBY COUNTY SCHOOLS, 2023-2024 STUDENT-PARENT HANDBOOKS (2023) (“The District may require and collect the following fees/fines from students: 1. Fines imposed on all students for late-returned library books.”).

4. CHANDLER UNIFIED SCHOOL DISTRICT, 2024-2025 ELEMENTARY STUDENT HANDBOOK (2024) (“Late Pick Up -- Community Education Programs. We understand that emergencies do occur. However, our procedure for late pick up is as follows: \$1.00 per minute, per child after the end of the scheduled class time.”)

5. INDIANAPOLIS PUBLIC SCHOOLS, CODE OF CONDUCT 2024-2026 (2024) (“It is the desire of the Board to fulfill its obligation to maintain a solvent textbook rental fund to provide textbooks for the students of the schools. It is also the desire of the Board that each patron discharge the responsibility of carrying his/her fair share of the financial obligation in maintaining this fund.”)

6. CINCINNATI CITY SCHOOL DISTRICT, FEE ASSESSMENT FORM (2023) (“Cincinnati Public Schools collects student fees annually. The money is used to pay for part of the cost of essential classroom materials. Student fees are based on a family's income and the number of children in the family who are enrolled in Cincinnati Public Schools.”)

7. Thalia González & Paige Joki, *Reproducing Inequality: Racial Capitalism and the Cost of Public Education*, 65 BOSTON COLLEGE L. REV. 318 (2024) (systematic review of educational school-based fines in Pennsylvania schools across all Local Education Agencies); Tonya L. Brito, Kathryn A. Sabbeth, Jessica K. Steinberg & Lauren Sudeall, *Racial Capitalism in the Civil Courts*, 122 COLUM. L. REV. 1243 (2022) (examination of fines and fees in civil court systems); MATTHEW MENENDEZ, MICHAEL F. CROWLEY, LAUREN-BROOKE EISEN & NOAH ATCHISON, *THE STEEP COSTS OF CRIMINAL JUSTICE FEES AND FINES: A FISCAL ANALYSIS OF THREE STATES AND TEN COUNTIES* (2019).

8. SALEM-KEIZER SCHOOL DISTRICT, ADMINISTRATIVE POLICY: FEES: STUDENT (2017) (“A student in grades 6 – 12 may be charged a fee to include, but not limited to, the following:

4.1. Textbook rental.

4.2. Supplies or materials above and beyond the requirements necessary to obtain the highest possible grade and credit in any course offering.

4.3. Participation in a program if there is no requirement to participate and no grade or credit given.

4.4. Participation in co-curricular or extracurricular activities where costs are not assumed by the School. [...]

6. Students and their parents/guardians shall be held financially responsible for any materials lost or willfully damaged.

7. The District shall pursue the collection of debts to the full extent allowed by Oregon State statute. Nonpayment of fees, fines, and/or restitution for damaged/lost property may result in:

7.1. Loss of privileges related to the student's participation and/or attendance at school events and/or non-academic activities including but not limited to ceremonies and/or activities related to graduation, athletic events, and school sponsored dances or parties (including prom).

8. Transcripts of records shall not be withheld when requested by parents/guardians, the student, another school district for use in the appropriate placement of the student, or a higher education institution.”)

9. AM. PUB. HEALTH ASS'N, ADDRESSING SOCIAL DETERMINANTS TO ENSURE ON-TIME GRADUATION (2016), <https://www.apha.org/policies-and-advocacy/public-health-policy-briefs/policy-database/2017/01/13/social-determinants-and-graduation> (last visited Feb. 24, 2026).

10. NATIONAL LIBRARY OF MEDICINE, VITAL SIGNS FOR PEDIATRIC HEALTH: HIGH SCHOOL GRADUATION (2023) <https://pmc.ncbi.nlm.nih.gov/articles/PMC10618001/> (last visited Jan. 26, 2026).

11. OFFICE OF DISEASE PREVENTATION AND HEALTH PROMOTION, HIGH SCHOOL GRADUATION: LITERATURE SUMMARY, <https://odphp.health.gov/healthypeople/priority-areas/social-determinants-health/literature-summaries/high-school-graduation> (last visited Jan. 24, 2026).

12. BUREAU OF LABOR, EDUCATION PAYS, 2020 (2021), <https://www.bls.gov/opub/ted/2024/median-weekly-earnings-946-for-workers-with-high-school-diploma-1533-for-bachelors-degree.htm> (last visited Jan. 24, 2026); BUREAU OF LABOR, MEDIAN WEEKLY EARNINGS \$946 FOR WORKERS WITH HIGH SCHOOL DIPLOMA, \$1,533 FOR BACHELOR'S DEGREE (2024).

13. Melanie Hanson, *College Enrollment & Student Demographics Statistics*, Education Data Initiative (2025)

14. OFFICE OF DISEASE PREVENTATION AND HEALTH PROMOTION, HIGH SCHOOL GRADUATION: LITERATURE SUMMARY, <https://odphp.health.gov/healthypeople/priority-areas/social-determinants-health/literature-summaries/high-school-graduation> (last visited Jan. 24, 2026).

15. CHARLOTTE-MECKLENBERG SCHOOLS, 2024-2025 PARENT-STUDENT HANDBOOK, 111 (2024).

16. ALBUQUERQUE PUBLIC SCHOOLS, PJ43 STUDENT FEES, FINES, AND CHARGES (2021), <https://www.aps.edu/about-us/policies-and-procedures/procedural-directives/j.-students/student-fees-fines-and-charges> (last visited Nov. 6, 2025).

17. ALBUQUERQUE PUBLIC SCHOOLS, PJ43 STUDENT FEES, FINES, AND CHARGES (2021), <https://www.aps.edu/about-us/policies-and-procedures/procedural-directives/j.-students/student-fees-fines-and-charges> (last visited Nov. 6, 2025) (“Lost or Damaged Student Technology Devices. Failure to turn in your assigned device may result in the student being charged a replacement cost. If a device and/or AC power adaptor has been defaced or damaged beyond the normal wear, the student or family may be charged a fee for repairs or replacements. Technology shall maintain a list of current fees and charges. This list will be available on the APS website, and schools will make the charges available to families. Families may also be charged for replacements if devices are lost or stolen.”)

18. MESA PUBLIC SCHOOLS, STUDENT HANDBOOK, 20 (2024) (“Lost or damaged textbooks, devices, and other required materials must be replaced. Students who do not meet their financial obligations may not be allowed to participate in extracurricular activities or graduation exercises.”)

19. NEW HAVEN PUBLIC SCHOOLS, STUDENT AND FAMILY HANDBOOK (2023) (“It is, therefore, the policy of the Board to hold parents financially liable for the cost of lost and/or damaged textbooks and library books assigned to students ... . A student's report card, transcripts and grades will be withheld, and/or the student, where applicable, will not be allowed to participate in graduation exercises if students or parents do not make financial restitution.”)

20. SALEM-KEIZER SCHOOL DISTRICT, ADMINISTRATIVE POLICY FEES: STUDENT (2017) (“A student in grades 6 – 12 may be charged a fee to include, but not limited to, the following: 4.1. Textbook rental. 4.2. Supplies or materials above and beyond the requirements necessary to obtain the highest possible grade and credit in any course offering. 4.3. Participation in a program if there is no requirement to participate and no grade or credit given. 4.4. Participation in co-curricular or extracurricular activities where costs are not assumed by the School. [...] 6. Students and their parents/guardians shall be held financially responsible for any materials lost or willfully damaged. [...] 7. The District shall pursue the collection of debts to the full extent allowed by Oregon State statute. Nonpayment of fees, fines, and/or restitution for damaged/lost property may result in: 7.1. Loss of privileges related to the student's participation and/or attendance at school events and/or non-academic activities including but not limited to ceremonies and/or activities related to graduation, athletic events, and school sponsored dances or parties (including prom).”)

21. BILLINGS PUBLIC SCHOOLS, BILLINGS PUBLIC SCHOOLS DISTRICT’S STUDENT/PARENT HANDBOOK, 4 (2024) (“Report cards will be held until assessed fines have been paid.”); BOISE SCHOOL DISTRICT, POLICY 3550: PAYMENT OF FEES OR RETURNING OF PROPERTY (“As a condition of registration, graduation, or the issuance of a report card, diploma, certificate, or transcript, all indebtedness incurred by a person when a student is or was a student, must be paid.”)
22. BILLINGS PUBLIC SCHOOLS, BILLINGS PUBLIC SCHOOLS DISTRICT’S STUDENT/PARENT HANDBOOK, 34 (2024).
23. NEW HAVEN PUBLIC SCHOOLS, STUDENT AND FAMILY HANDBOOK (2023) (“It is, therefore, the policy of the Board to hold parents financially liable for the cost of lost and/or damaged textbooks and library books assigned to students ... . A student’s report card, transcripts and grades will be withheld, and/or the student, where applicable, will not be allowed to participate in graduation exercises if students or parents do not make financial restitution.”)
24. BOISE SCHOOL DISTRICT, POLICY 3350: PAYMENT OF FEES OR RETURNING POLICY (2023) (“As a condition of registration, graduation, or the issuance of a report card, diploma, certificate, or transcript, all indebtedness incurred by a person when a student is or was a student, must be paid.”)
25. NEWARK PUBLIC SCHOOL DISTRICT, FILE CODE 5127 COMMENCEMENT ACTIVITIES (2019) (“The district reserves the right to withhold a diploma and transcripts until all fines are paid.”)
26. JEFFCO PUBLIC SCHOOLS, PARENT-STUDENT & FAMILY HANDBOOK: 2024-2025, 26 (2024) (“In addition, fees are charged for entrance testing, yearbooks, student transcripts and to be able to attend athletic/activity events and graduation ceremonies.”)
27. MILWAUKEE PUBLIC SCHOOLS, PARENT/STUDENT HANDBOOK ON RIGHTS, RESPONSIBILITIES, AND DISCIPLINE (2024) (“Children experiencing homelessness have rights and are eligible for services, including: [f]ree school meals and school supplies; and [w]aivers of school fees.”)
28. SPRINGFIELD PUBLIC SCHOOLS, 2024-2025 STUDENT HANDBOOK (2024) (“The athletic participation card fee will be waived upon the request of a parent for those high school students eligible for free and reduced lunch.”)
29. WICHITA PUBLIC SCHOOLS, BOARD OF EDUC. POLICY 3445 TEXTBOOK RENTAL FEES, 38 (2020) “There is a district-wide high school Book Fee of \$95.00 per student. Those who qualify for reduced fees will pay \$57.00. The Book Fee helps pay for textbooks, electronic textbooks, and supplementary instructional materials. It does not include fine arts fees, lock fees for individual interscholastic sports, or special materials for personal projects.”).
30. CRANSTON PUBLIC SCHOOL DISTRICT, UNPAID MEAL POLICY (2021) (“In extreme hardship situations the building administrator may authorize a one-time exception to the charge policy by providing the student with a note/authorized form to be presented to the cashier at lunch.”)