



SATISFACTORY ACADEMIC PROGRESS

Region 5 Workshop

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SATISFACTORY ACADEMIC PROGRESS (SAP)

668.34 (a) Satisfactory Academic Progress policy

An institution must establish a reasonable satisfactory academic progress policy for determining whether an otherwise eligible student is making satisfactory academic progress in his or her educational program and may receive assistance under the Title IV, HEA programs.



SAP COMPLIANCE CONCERNS

- ✓ Failure to develop a policy that meets minimum Title IV requirements
- ✓ Misalignment of pace of progression and maximum timeframe
- ✓ Applying a different policy than the official written SAP policy
- ✓ Failure to properly monitor and/or document satisfactory progress
- ✓ Failure to comply with the Program Integrity regulations, effective 7/1/2011

SAP STANDARDS

- Reasonable
- Consistently applied
- Applies to all Title IV programs
 - If not meeting SAP, not eligible for any TIV program
 - Cannot say eligible for Pell but not eligible for Loans
- “ED provides the outline; schools fill in the details”
 - Schools have a lot of flexibility



“AS STRICT OR STRICTER”

- Having an SAP policy “as strict or stricter” than other school policies refers to the *actual measurements* used to monitor qualitative and quantitative standards - GPA and pace of progression
- It does NOT refer to the frequency in which the school checks SAP
 - Therefore academics might check GPA every term but financial aid can check GPA for SAP purposes annually

POLICY Q & A - DIFFERENT POLICIES

SAP-Q9: Is an institution required to use the same SAP policy for all students?

SAP-A9: No, the policy must explain the qualitative (grade-based) and quantitative (time-related) standards the institution uses to check SAP; however, an institution is permitted to establish different SAP standards for different programs or categories (e.g., full-time, part-time, undergraduate, and graduate students) which must be applied consistently to students in that category or program.

SAP EVALUATION ITEMS

- At each formal SAP evaluation point, a school checks:
 1. Qualitative measure (grade-based)
 - Remedial coursework qualitative measure may be part of or separate from regular qualitative measure
 - Qualitative measure for programs greater than two years
 2. Quantitative measure (pace of progression)
 3. Maximum timeframe

SAP POLICY REQUIREMENTS

- Must specify that if a student is not meeting the standards, he or she is not eligible to receive Title IV aid
- Warning and probation statuses must be described if included in school's policy
- Students must be notified of determinations that impact their Title IV aid
- Required elements include:
 - Measurement of student's progress at each official evaluation point
 - GPA student must achieve
 - Pace of progression

SAP POLICY – OTHER KEY ITEMS

- Policy must include the following -
 - Describe how student's GPA and pace of completion affected by:
 - *Incompletes*
 - *Withdrawals*
 - *Repetitions*
 - *Transfers of credits*
 - Transfer credits accepted toward completion of student's program must count as both hours attempted and hours completed



POLICY Q & A – NON-ACCEPTED CREDITS

SAP-Q6: SAP regulations require credit-hours accepted toward student's program count as both attempted and completed when calculating pace for SAP. Can an institution's policy include *non-accepted credits* as attempted credits for purposes of these calculations?

SAP-A6: Yes. The treatment of these credits would be up to the institution. The SAP regulations do not address non-accepted credits.

- May refer to transfer credits or credits earned in other academic programs at your school

QUALITATIVE MEASURE

Definition: To assess quality of academic work using standards measurable against a norm

- ▶ Grades; work projects; etc.
- Must be cumulative
- May use a graduated or fixed standard
- Can be more restrictive and have payment period measurements in addition to cumulative measures
 - ▶ Could have an overall cumulative program or school GPA and a semester GPA requirement



POLICY Q & A - REMEDIAL

- SAP-Q3: How are remedial courses treated for SAP purposes?
- SAP-A3: The institution's SAP policy should describe how remedial courses are treated. An institution may, but is not required to, include remedial coursework in determining pace. However, the school must evaluate remedial coursework under the qualitative factor, though it does not have to be part of the GPA. If not part of the GPA, the school must have some other measurement process to evaluate remedial coursework (passing courses, meeting course requirements, etc.).

QUANTITATIVE MEASURE

Definition: To measure progress toward program completion

- Must be cumulative
- May use a graduated or fixed standard
- Can be more restrictive and have payment period measurements in addition to cumulative measures

▶ Could have an overall cumulative completion pace and a semester completion requirement



QUANTITATIVE MEASURE

- Pace of progression required to make sure student completes within maximum timeframe
- Calculate the pace at which the student is progressing by
 - Dividing the cumulative number of hours the student has successfully completed by the cumulative number of hours the student has attempted:
 - Cumulative hours completed
 - Cumulative hours attempted
 - For clock-hours you are evaluating cumulative clock- hours required to complete as expressed in calendar time

QUANTITATIVE MEASURE

- School may use standard rounding rules when calculating percentages under the quantitative measurement
 - Clock-hour or credit-hour programs
 - Example – 66.5% could be rounded up to 67%
- Rounding is optional within SAP policy
- Program integrity Q & A website under the SAP topic, question R-Q9 (clock-hour example)

MAXIMUM TIMEFRAME

- Limits of Maximum Timeframe

- For undergraduate programs, must be no longer than 150% of published length of educational program
- For graduate programs, school defines the maximum based upon length of program

- Example:

- Degree program requires 120 credits for completion
- $120 \times 150\% = 180$ attempted credits is maximum timeframe

- Quantitative measure (tied to max timeframe)

- $120 \text{ credits} / 180 \text{ credits} = 66.6\%$ (usually rounded to 67%)
 - *Student must earn 67% of credit-hours attempted*

MAXIMUM TIMEFRAME

- Must be measured at each evaluation point
 - Student is ineligible at the evaluation point where indicated will exceed max timeframe NOT at the point when they actually reach the max timeframe
- Example
 - At end of payment period (SAP evaluation checkpoint) student has attempted 160 credit-hours out of a possible 180 credit-hours allowed under max timeframe but has 25 hours left to earn to complete his degree
 - The student is not meeting SAP due to exceeding the max timeframe because he has more hours to earn than what is allowed to graduate within the maximum timeframe

CHECKING SAP



- Student's SAP evaluations, whether each payment period, annually or less often than each payment period, must occur at the end of a payment period
 - *Official evaluation period cannot be less than a payment period*

SAP – CLOCK-HOURS

School must establish one review option for a program

- Evaluation “at end of payment period”
 - Schools have three options
 - 1) At the point when the student’s *scheduled clock-hours* payment period have elapsed, regardless of whether the student attended them; or
 - 2) At the point when the student has *attended* the scheduled clock-hours; or
 - 3) At the point when the student *successfully completes* the scheduled clock-hours for that payment period.

SAP (NON-TERM CREDIT-HOURS)

- Evaluation “at end of payment period”
 - Schools have two options
 - 1) On the date when the student was scheduled to earn the credit-hours; or
 - 2) When the student successfully earns the credit-hours

School must establish one review option for a program; cannot start with one option and then after the first review, switch to a different option for that cohort of students.

HOW OFTEN IS SAP EVALUATED?

- Frequency of evaluation determines options
 - School must evaluate SAP at end of each payment period for programs of study that are *one academic year or less in length*
 - For programs of study *longer than one academic year*
 - School must evaluate at least annually to correspond with end of a payment period
 - School may evaluate at end of each payment period



SAP EVALUATIONS

- Each official evaluation must include evaluation of the qualitative (grade-based), quantitative (time-related) and maximum timeframe standards
- Financial aid warning and probation statuses only last for one payment period, no matter how frequently SAP is evaluated
- “Financial aid warning” and “Financial aid probation” must have the same definitions as described in regulation



FINANCIAL AID WARNING PERIOD

- For an institution that chooses to evaluate SAP at the end of EACH payment period, a “financial aid warning” status *may* be used (optional)
 - Student may continue to receive Title IV aid for ***one payment period***
 - No appeal necessary
 - Note: Possible for student to receive more than one warning period during academic career just NOT consecutively

FINANCIAL AID PROBATION

- To be placed on Financial Aid Probation, a student must:
 - Appeal and have it approved by the school; AND
 - Student expected to be making SAP in next payment period; *OR*
 - Be successfully following an academic plan designed to ensure student will be able to meet SAP by a specific point in time
 - Not required to develop academic plans
 - Can set conditions on developing plans
 - ED does not define what office(s) must develop and oversee

FINANCIAL AID PROBATION

- A student on Financial Aid Probation may only receive Title IV funds for **ONE payment period**
- A student on F/A Probation may not receive Title IV funds for the subsequent payment period **UNLESS**:
 - Student is now making SAP; or
 - Institution determines student met requirements specified by the school in the academic plan and student still covered by academic plan
- SAP must be checked at the end of the probationary payment period (even if SAP is normally checked annually)

POLICY Q & A – ACADEMIC PLANS

ACP-Q3: Can the academic plan be the same for all students or the same by student categories or must the plan be created individually for each student?

ACP-A3: According to the regulations, the academic plan is developed by the institution and the student individually. It is possible that a general plan could be used for students in a similar circumstance and then customized, as needed, for each student's particular circumstance.

POLICY Q & A – ACADEMIC PLANS

ACP-Q4: Must the academic plan be mathematically set to graduate student within 150% timeframe?

ACP-A4: The academic plan must be designed to ensure that the student is able to meet the institution's satisfactory academic progress standards by a specific point in time. In some cases, this *could mean that the maximum timeframe would be extended based on the student's approved appeal.*

POLICY Q & A – FINANCIAL AID PROBATION

PROB-Q4: How many times may a student be placed on probation for failing to meet SAP standards?

PROB-A4: A student may be placed on probation for one payment period per appeal. It is possible that a student could be placed on probation more than once in his or her academic career.



APPEALS

- Process by which student who is not meeting school's SAP policy petitions for reconsideration of eligibility for Title IV
- Policy must specify the conditions under which a student may appeal
 - Appeal must include:
 - Why the student failed to make SAP; AND
 - What has changed that will allow the student to make SAP at the next evaluation
- ED does not define what office must oversee appeals or how appeals are reviewed (individuals, committees, etc.)

POLICY Q & A – APPEAL DOCUMENTS

APP-Q2: What documentation is required for a student appeal?

APP-A2: That is up to the institution. An institution may choose to request additional documentation when a particular student circumstance warrants it. The institution may decide to require more extensive documentation on an initial appeal and an update statement on a subsequent appeal.



WHICH APPEAL WOULD YOU CONSIDER?

I failed last year because I was lazy and immature and didn't do my homework. Please reinstate my financial aid. Please. Pleaseeeeee. Pretty pleaseeeeee.



WHICH APPEAL WOULD YOU CONSIDER?

December 1, 2015

Dear Financial Aid Office:

I failed all my classes last semester because I was in a major motor vehicle accident on March 15, 2015 in Santa Barbara, CA. Documentation is attached. I was in the hospital (White Memorial Medical Center-L.A.) from March 15 to April 3, 2015. Documentation is attached. I have now recovered and have included a medical clearance form from Dr. Marcus Welby. I will not text and drive any more because my parents cancelled my cell phone contract and smashed my cell phone with a 10 # sledge hammer.

Sincerely, John Q. Student

enclosures

APPEAL NOTIFICATION

- Notification to students
 - Must notify student of results of SAP review that impacts student's eligibility for Title IV aid
 - If institution has an appeal process, must describe the specific elements required to appeal SAP
 - May specify how often and how many appeals are allowed
 - Regardless as to whether or not you have an appeal process, you must always describe how a student who has failed SAP can reestablish eligibility for Title IV aid

MONITORING SAP

- If measure each payment period –
 - Following a payment period in which the student did not make SAP, the school *may*:
 - Place the student on Financial Aid Warning; or
 - Place the student on Financial Aid Probation (with proper appeal approvals)
 - If already on Financial Aid Warning -
 - After ONE payment period, student must:
 - Make SAP; or
 - *May* be placed on probation after successful appeal

MONITORING SAP

- ▶ If evaluate SAP annually or less often than each payment period -
 - Following a payment period in which the student did not make SAP, the school *may*:
 - Place the student on Financial Aid Probation (with proper appeal approvals)
- ▶ “Annually” means a 12-month period
 - An institution is expected to review a student’s SAP *at least once every 12 months* (for programs allowed to be checked annually)

IMPLEMENTATION QUESTIONS

- Will you have fixed or graduated standards?
- Will you have different standards for different categories of students?
- How will you treat course incompletes, withdrawals, and repetitions?
- How will you treat transfer credits?
- How will you treat remedial courses?
- Will your policy permit appeals, and if so, how many?
- Who will review appeals?
- If you have academic plans, who will develop, approve, and monitor compliance with academic plans?

RESOURCES/REFERENCES

- FSA Assessments, Student Eligibility section:
 - <http://ifap.ed.gov/qahome/qaassessments/studentelig.html>
- 668.16, 668.34 (SAP)
- 2015-16 *FSA Handbook* Vol. 1, Chapter 1
- *Electronic Announcement - September 2, 2011*
 - Policy Q & A Webpage on program integrity regulations
 - <http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/integrity-qa.html>
 - Upper right-hand side of IFAP

▶ QUESTIONS?

