

# Session #6



## Understanding Your Satisfactory Academic Progress Policy



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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, *Higher Education Act of 1965 (HEA)* programs.



# SAP Compliance Concerns

- Student appeals incorrectly approved or not adequately supported
- Failure to develop a policy that meets minimum federal student aid (Title IV) requirements
- Applying a different policy than the official written SAP policy
- Misalignment of pace of progression and maximum time frame
- Failure to properly monitor and/or document satisfactory progress

# SAP Standards

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



# “As Strict or Stricter”

- School must have a SAP policy at least as strict as the policy the school applies to students not receiving Title IV aid
  - Example - School’s SAP policy cannot indicate freshman can have a 1.5 grade point average (GPA) if academics requires all students have a 2.0 to be in good standing
- The “as strict or stricter” requirement refers to the *actual measurements* used to monitor SAP – qualitative, quantitative, and maximum time frame standards
  - It does NOT refer to frequency in which SAP checked
    - Therefore, academics might check GPA every term but financial aid can check GPA for SAP purposes annually

# Different SAP Policies

- A school is permitted to establish different SAP standards or policies for different categories of students
- These categories or groups of students may include
  - Full-time vs. part-time students
  - Undergraduate vs. graduate students
  - Different programs of study
- Please note: this does NOT allow different policies for subsets of students (e.g., veterans, athletes, females, etc.)
- Any SAP policy must contain all required elements and be applied consistently to students in that category

\*Reference: SAP-Q9 (Program Integrity Q & A website – upper right-hand corner of [ifap.ed.gov](http://ifap.ed.gov))

# SAP Evaluation Items

- At each formal SAP evaluation point, a school checks:
  1. Maximum time frame
  2. Quantitative measure (pace of progression)
  3. Qualitative measure (grade-based)
    - Must include remedial coursework
    - Specific qualitative measure checkpoint for programs greater than two academic years

# Maximum Time Frame (MTF)

Definition: Maximum time a student can receive Title IV aid to complete a program of study

- Limits of Maximum Time Frame
  - For undergraduate programs, must be no longer than 150% of published length of educational program
    - Schools may have more restrictive time frame (e.g. 125%, etc.)
  - For graduate programs of study, school defines the maximum based upon length of program
    - For credit-hour programs it is based on credit hours (to align with quantitative measure)
      - Cannot be based solely on number of semesters or years

# Maximum Time Frame

- Credit hour example:
  - Degree program requires 120 credits for completion
  - $120 \times 150\% = 180$  attempted credits is maximum time frame
  - Quantitative measure (tied to max time frame)
    - $120 \text{ credits} / 180 \text{ credits} = 66.6\%$  (usually rounded to 67%)
    - Must earn 67% of credits attempted to graduate in maximum time frame
- Clock hour example:
  - 1200 clock hour program is 40 weeks long
  - $40 \text{ weeks} \times 150\% = 60$  week maximum time frame
  - Quantitative measure (tied to maximum time frame)
    - $40 \text{ weeks} / 60 \text{ weeks} = 66.6\%$  (usually rounded to 67%)
    - Must complete 67% of clock hours and weeks each evaluation period to complete program in maximum time frame

# Maximum Time Frame and Pace

Maximum time frame (MTF), in conjunction with pace of progression, ensures student completes the program within the maximum time frame. Must ensure the maximum time frame and quantitative measure are in alignment.

- If graduated pace is used, must ensure final pace (all graduated paces) align with final MTF

100% - Scheduled Length

150% - Maximum Time

= 67% Pace Requirement

100% - Scheduled Length

118% - Maximum Time

= 85% Pace Requirement

100% - Scheduled Length

85% - Pace Requirement

= 118% Maximum Time

# Maximum Time Frame

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

# Quantitative Measure (Pace)

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
  - For example, school could have an overall cumulative completion pace of 67% and a semester/payment period completion requirement of 67%

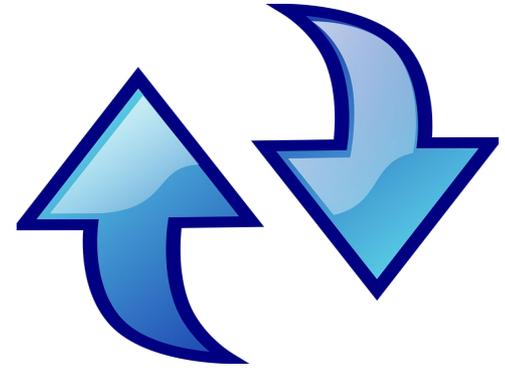


# Quantitative Measure

- Pace of progression required to make sure student completes within maximum time frame
- Calculate the pace at which the student is progressing by -
  - For credit hours, dividing cumulative number of credit hours student has successfully completed by cumulative number of credit hours student attempted:
    - Cumulative credit hours completed
    - Cumulative credit hours attempted
  - For clock hours, evaluating cumulative clock hours under the quantitative measure expressed in calendar time
    - Successfully completed clock hours and Weeks successfully completed hours should take to complete  
Scheduled clock hours Actual weeks attended

# 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



*Rounding can also apply to the qualitative measure*

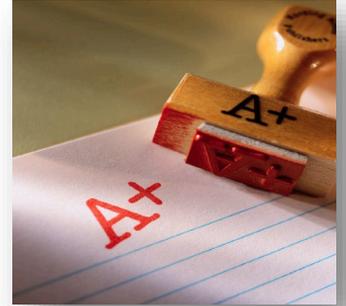
# Quantitative Measure

- Credit hour example:
  - At the end of the 2<sup>nd</sup> semester, a student has cumulatively completed 16 credits while attempting 24 credits
  - Quantitative measure equals –  $16 \text{ completed} / 24 \text{ attempted} = 67\%$
  - In conjunction with maximum time frame, the quantitative measure will tell you if student is progressing at a pace to graduate within the maximum time frame
- Clock hour example:
  - Student scheduled to earn 30 hours a week in 450 hour/15 week payment period
  - End of 1<sup>st</sup> payment period, student successfully completed 300 hours in 15 weeks (30 hrs. per week student should have completed 300 hrs. in 10 weeks)
  - Quantitative measure in hours –  $300 / 450 = 67\%$
  - Quantitative measure in weeks –  $10 / 15 = 67\%$

# Qualitative Measure

Definition: To assess quality of academic work using standards measureable 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
  - For example, school could have overall cumulative program or school GPA (2.0) and a semester/payment period GPA requirement (2.0)



# Qualitative Measure - Remedial

- Remedial coursework taken by a student must be evaluated under the qualitative measurement
  - It can be incorporated as part of the student's regular school GPA; or
  - If not part of the regular GPA, the school must have some other measurement process to evaluate remedial coursework
    - Passing courses, meeting course requirements, separate GPA, etc.
- An institution MAY, but is not required to, include remedial coursework in determining maximum time frame and pace

## Policy Q & A: SAP-Q3

# Qualitative Measure – Programs > 2 years

- For programs greater than two years, school must check the qualitative measure (GPA) at end of the 2<sup>nd</sup> academic year
  - Student must have a GPA of at least a “C” or its equivalent, or have an academic standing consistent with the institution's requirements for graduation
  - *If school uses a graduated GPA, a student is considered to be meeting the academic standing consistent for graduation if the student meets the graduated GPA requirement for their current grade level (e.g. sophomores required to have a 1.9 GPA, etc.)*
- The Department has interpreted the “second academic year” as the student being at the school for four semesters or six quarters, regardless of a student’s enrollment status

Policy Q & A: R-Q2

# SAP Policy – Other Key Items

- Policy must also include the following -
  - Describe how student's GPA and pace of progression are affected by:
    - *Incompletes*
    - *Withdrawals*
    - *Repetitions*
    - *Transfers of credit from other institutions*



# SAP Policy – Other Key Items

- Incompletes
  - How does an “I” grade impact student’s GPA/Pace
  - Once an “I” is converted to a final grade, school can factor in course at next formal SAP checkpoint or retroactively depending on school’s policy
- Withdrawals
  - Cannot exclude “W”s earned past an add/drop period
  - Courses dropped within add/drop period do not have to be factored into SAP
- Repetitions
  - School decides how repeat coursework impacts qualitative and quantitative measures (credit and clock hour programs)
    - Use all grades, average of grades, highest grade, etc.
  - Reference: SAP-Q8 (program integrity Q & As)

# SAP Policy – Other Key Items

- Transfers of credit from other institutions
  - Transfer credit accepted toward completion of student's program must count as both hours attempted and hours completed (quantitative)
    - For clock hours, transfer hours accepted into a program are factored into the quantitative measure and max time frame by reducing the number of hours remaining in the program
  - Up to school if transfers factor into qualitative measure (GPA)
  - If hours earned from another school under a consortium agreement is considered transfer hours, must be factored into quantitative measure (may be factored into qualitative measure)

# 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

# Non-Accepted Credits

- Transfer Example:
  - Student transcript shows 100 credits of which 40 credits could apply to the student's new program but only 20 credits accepted by registrar (grades, duplication, etc.)
  - Under SAP, the school must at least count the 20 hours accepted into the program under the quantitative measure
  - However, the school could choose to have a SAP policy that counts all 40 credits that could have applied to the program, or all 100 credits on the transcript
- *Same concept applies when a student changes programs*
  - Must factor in all courses that transfer into the new program but could choose to factor in more (or all courses) ever taken at the school

# Checking SAP

- SAP evaluations, whether each payment period, annually, etc., must occur at the end of a payment period
  - Official evaluation period cannot be less than a payment period
  - May have informal checks during a payment period but formal SAP evaluations must occur at end of a payment period
    - If term-based, at the end of a term



# 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* for the 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

*Examples in the Program Integrity Q & A website – SAP Question R-Q9*

# SAP (Non-term Credit-Hours)

*School must  
establish one  
review option  
for a program*

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

Example - a school has a 20 credit-hour program taught over 30 weeks with two payment periods of 10 credit-hours/15 weeks

- School must check SAP at end of the 1<sup>st</sup> payment period:
  - Can check SAP at point student scheduled to complete 10 credit-hours;
  - OR
  - Can check SAP when student successfully completes (passes) 10 credit-hours

# How Often is SAP Evaluated?

- Frequency of evaluation determines options
  - School must evaluate SAP at end of each payment period for programs that are *one academic year or less in length*
    - e.g. 900 clock-hour program, 20 semester credit-hour program
  - For programs of study *longer than one academic year*
    - School must evaluate at least annually to correspond with end of a payment period
      - At least once every 12 months
    - School may evaluate more frequently (i.e. at end of each payment period, etc.)

# SAP Evaluations

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



# 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 policy element)
  - Student may continue to receive Title IV aid for ***one payment period***
  - No appeal necessary

Note: If a school policy permits multiple warnings, it is possible for a student to receive more than one warning period during an academic career, but the warning periods CANNOT be consecutive

# Probation

- To be placed on Probation, a student must:
  - Appeal and have it approved by the school; AND
  - Mathematically be able to make 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

# Policy Q & A – Academic Plans

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

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 time frame would be extended based on the student's approved appeal.*

**10/29/10 Federal Register reminds schools that 150% maximum time frame can be appealed**

# Appeals

- Process by which student who is not meeting school's SAP policy petitions for reconsideration of eligibility for Title IV
- If the school allows for appeals, the SAP 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.)

# Appeal Notification

- Notification to students
  - Must notify student of results of any SAP review that impacts student's eligibility for Title IV aid
  - If institution has an appeal process (not required), 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 lost Title IV aid due to failing SAP can reestablish eligibility for Title IV aid

**NOTE:** *There is no regulatory requirement for a school to notify non-TIV students of their eligibility for Title IV aid*

# Probation

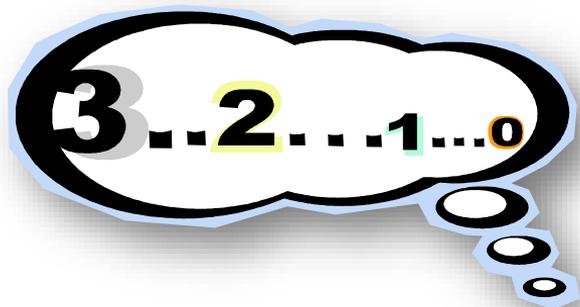
- A student on Probation may only receive Title IV funds for **ONE payment period**
- A student on Probation may not receive Title IV funds for the subsequent payment period **UNLESS**:
  - Student is now making SAP; or
  - Institution determines student met requirements specified by the school in the 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 - 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.

- New and updated information, additional and new circumstances are expected in subsequent appeals



# Additional SAP Guidance & Resources



# Policy Guidance – Multiple Programs

Question: How does a school handle SAP if a student is enrolled simultaneously in two separate academic programs with the purposes of earning two distinct academic credentials?

Answer: The school would calculate SAP and all its' components separately for each individual program.

# Policy Guidance – Prior Periods

Question: For a school that checks SAP at the end of each payment period, if a student is not receiving Title IV (TIV) aid for their first three semesters (never applied for aid) but does so poorly in each of the semesters that cumulatively he is not making SAP after each semester, if he later applies for Title IV aid has his warning period already elapsed?

Answer: Yes. The student would be suspended from TIV aid and would only be eligible for TIV aid if an appeal was approved for probation. Past periods not making SAP, whether receiving aid or not, can and does impact TIV eligibility in future terms.

# Policy Guidance – Academic Plans

Question: The regulations indicate that an academic plan must be designed for a student to meet SAP by a specific point in time. How do we define a future point in time?

Answer: Where applicable, a date should be used. If a date cannot be confirmed, then a school should use some kind of defined end-point – after the third semester, anticipated graduation date, etc. If the graduation point is after the 150% max time frame, the graduation point should be indicated in some format. It cannot simply be an open-ended process; needs to be a finite point.

# Policy Guidance – Academic Plans

Question: Can the school include a five-hour student success workshop (financial aid policies, student services, academic planning, etc.) as part of the student’s academic plan?

Answer: Yes. The regulations are silent on what conditions must or can be included in an academic plan. The school would have to outline the workshop process in their SAP policy if they determine they want to use it in their academic plans.

# Policy Guidance – Regaining Eligibility

Question: What happens if a student is on an academic plan and at the end of a payment period they are not meeting the plan requirements but are now meeting the general SAP standards?

Answer: Once a student is meeting the general SAP standards at a checkpoint, regardless of the plan, they are now in good standing (main point of the plan is to help the student meet the SAP standards). A school may want to indicate in a plan that a student can continue receiving TIV aid if they meet the plan criteria or meet all general SAP standards.

# Policy Guidance – Regaining Eligibility

Question: If a student's SAP appeal is not approved until the middle of a payment period, is the student eligible for any Title IV aid in the payment period?

Answer: Yes. Once an appeal is approved and a student placed on probation, they are eligible for Title IV aid back to the beginning of the payment period in which the appeal was approved.

# Policy Guidance – Grade Changes

Question: Does SAP have to be recalculated for prior periods due to retroactive grade changes?

Answer: No. *Institutions are not required to recheck SAP and/or recalculate as the result of grade changes that occur between formal SAP evaluations (end of a payment period).* However, nothing precludes an institution from rechecking SAP to account for such changes based on the school's policy. Regardless if the school has a policy of rechecking SAP between evaluation points, any grade changes must be accounted for in the next scheduled SAP evaluation.

Note: if an institution makes grade changes for a past period after the subsequent payment period (for Pell) or academic year/award year (for other aid) has ended, it can include those changes in future SAP evaluations, but should not alter aid provided to the student on the basis of original evaluations.

# Policy Guidance – Transcripts

Question: In reviewing transcripts, what happens if a transcript comes in during a semester? When would the transfer hours impact SAP?

Answer: Per policy, the transfer hours on the transcript that could count in SAP would be factored in at the next scheduled SAP check point.



# Policy Q & A - Amnesty

APP-Q4: May an institution's SAP policy include automatic "academic amnesty" in certain circumstances, such as, after a student has not attended for a certain number of payment periods or years?

APP-A4: No. The regulations permit use of the automatic financial aid warning status for institutions that review SAP at each payment period. No other status may be granted automatically. A successful appeal is needed to grant financial aid probation status or to develop an academic plan.

*Reminder - courses removed or changed as a result of an institutional academic amnesty policy, must still be counted for SAP purposes*

# Resources/References

- FSA Assessments
  - <https://ifap.ed.gov/ifap/FSAAssessments.jsp>
- 668.16(e), 668.32(f), 668.34 (SAP)
- *FSA Handbook* Vol. 1, Chapter 1
- 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
  - Topic – “Satisfactory Academic Progress”

# Ask A Fed Goes Online!

FSA has implemented a new resource to assist Financial Aid Administrators obtain guidance about the FSA programs. Based on the popularity and effectiveness of the Ask A Fed desk at the annual FSA Training Conference, we have instituted a similar process using email.

Please send your inquiries about Title IV regulations to [AskAFed@ed.gov](mailto:AskAFed@ed.gov).



The Ask A Fed email box is staffed every business day by a team of FSA Training Officers ready to assist schools with their questions.