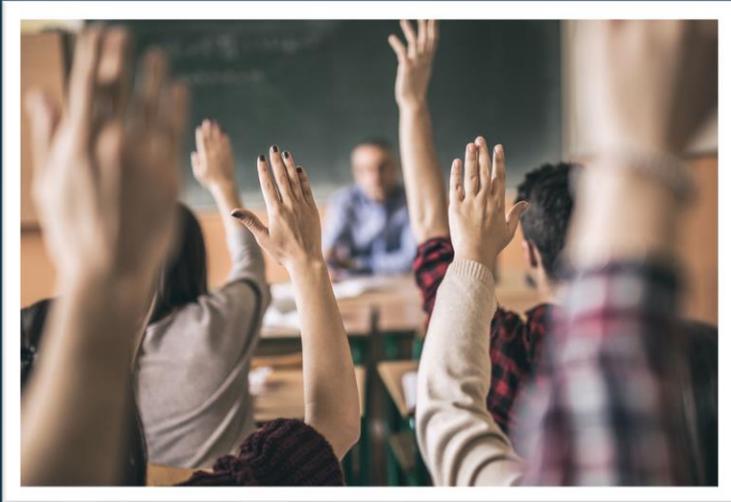


Session #7

SATISFACTORY ACADEMIC PROGRESS (SAP) GUIDANCE: A Q&A SERIES



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U.S. Department of Education
2020 FSA Training Conference for Financial Aid Professionals

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COVID-19

- This session will not address any specific adjustments or allowances related to the current COVID-19 national emergency and a student's satisfactory academic progress (SAP).
- For information related to COVID-19 and any additional guidance currently afforded institutions with respect to SAP, please attend or review:
 - *General Session #5, Federal Update: COVID-19 Higher Education Policy*

AGENDA

- New SAP Regulations (September 2, 2020 Federal Register)**
- SAP Resources and References
- SAP Questions and Answers
- SAP Checklist
- Contact Information

NEW SAP REGULATIONS



NEW SAP REGULATIONS

- On September 2, 2020, the Department published a final Federal Register Notice outlining the following SAP changes:
 - An institution may establish a term-based credit hour program's maximum time frame in credit hours or in calendar time.
 - If an institution establishes a maximum time frame in terms of calendar time, it evaluates a student's pace by determining the number of hours that the student should have completed at the evaluation point in order to complete the program within the maximum timeframe.
 - An SAP pace evaluation (quantitative) for a non-term credit or clock hour program is NO LONGER required (due to payment period completion requirements).
- New regulations are effective 7/1/21 or can be implemented as early as 9/2/20.

For further discussion about the new SAP regulations, please attend or review *Session #12, Regulatory Update – Distance Education*.

RESOURCES AND REFERENCES



RESOURCES/REFERENCES

- FSA Assessments
 - <https://ifap.ed.gov/ilibrary/document-types/fsa-assessments>
- 34 CFR 668.16(e); 668.32(f); 668.34
- 2020-2021 FSA Handbook Vol. 1, Chapter 1
- Policy Q&A webpage on program integrity regulations
 - Upper right-hand side of IFAP under “Hot Topics”
 - <https://www2.ed.gov/policy/highered/reg/hearulemaking/2009/integrity-qa.html>

QUESTIONS AND ANSWERS



AS STRICT OR STRICTER

Question: What does “as strict or stricter” actually mean within an institution’s SAP policy?

Answer: Institutions must have an SAP policy at least as strict as the policy the institution applies to students not receiving *Title IV* aid. The “as strict or stricter” requirement refers to the *actual measurements* used to monitor SAP – qualitative, quantitative, and maximum timeframe standards – and does not refer to the frequency in which the school checks SAP.

For example, an institution’s SAP policy cannot indicate freshman receiving *Title IV* aid can have a 1.5 GPA if general academic requirements hold all students (including freshmen) to having a 2.0 GPA to be in good standing.

DIFFERENT SAP POLICIES

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

Answer: 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).

Please note: Any SAP policy must contain all required elements and be applied consistently to all students in that category.

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.

Please note: If a student is earning a double major for which only one degree will be conferred, the school may consider all credits to be part of one academic program.

ATTENDANCE

Question: Can a school's attendance policy be separate and distinct from a school's SAP policy, or must it align with the school's quantitative measurement (pace)?

Answer: A school's attendance policy can be a separate requirement distinct from a school's SAP policy if the attendance policy is only used for record-keeping purposes (i.e. tracking the number of days missed). However, if the school defines successful completion of hours in a course to equate to showing up for class (attendance), then the school's attendance policy would be required to align with the school's SAP measurements.

TRANSCRIPTS

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



Answer: In that situation, the transfer hours on the transcript that could count in a student's SAP would be factored in the next scheduled SAP evaluation checkpoint.

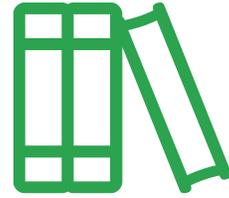
NON-ACCEPTED CREDITS

Question: 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?

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

- An institution's SAP policy may refer to transfer credits or credits earned in other academic programs at an institution.

PREPARATORY COURSES



Question: Does a school have to factor in preparatory courses (courses required to be admitted into a program of study) as part of the school's SAP policy?

Answer: No, the school does not have to evaluate preparatory coursework as part of the school's SAP policy. However, as part of its SAP policy, a school may include preparatory coursework. It is optional but not a requirement.

PASS/FAIL COURSES

Question: Does a school have to factor in pass/fail classes that are part of the student's program of study as part of the school's qualitative measure (GPA)?

Answer: No, the school does not have to factor in those limited classes a student takes as pass/fail into the GPA measurement as long as the course is factored into the quantitative measurement (pace of progression).



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 institution has a policy of rechecking SAP between evaluation points, any grade changes must be accounted for in the next scheduled SAP evaluation.

Please note: For Pell and TEACH Grants, you may only make a disbursement based on a grade change during the payment period immediately following the SAP evaluation that was affected by the change. For all other types of *Title IV* aid, you may only make a disbursement based on a grade change during the academic year in which the SAP evaluation takes place or, if the evaluation takes place at the end of an academic year, during the academic year following that SAP evaluation.

AMNESTY

Question: If the institution has an academic amnesty or forgiveness policy to remove certain courses from academic consideration due to specific circumstances (e.g., medical, family concerns, time last enrolled), can those courses be automatically removed from consideration in a student's SAP as well?

Answer: No. Courses removed or changed as a result of an institutional academic amnesty policy must still be counted for SAP purposes since SAP is a cumulative process and factors in all coursework applicable to a program of study.

- Exception for repeat coursework depending on SAP policy

DUAL ENROLLED STUDENTS

Question: How must a school treat coursework attempted by a student while enrolled in high school?



Answer: The school has some flexibility in how to address this situation. Since the high school student is not a regular student, the school can treat the high school student like a transfer student. Therefore, the school can handle the high school coursework according to its transfer credit policy outlined in its SAP procedures (e.g., choose to factor in grades or not).

CONSORTIUM AGREEMENTS



Question: Can a home school treat hours earned by a student through a consortium agreement at a host school as transfer hours for SAP purposes?

Answer: Yes. The home school has the flexibility to treat hours earned from a host school under a consortium agreement as transfer hours. Therefore, the home school can handle the consortium coursework according to its transfer credit policy outlined in its SAP procedures (e.g., choose to factor in grades or not).

REMEDIAL COURSEWORK

Question: : How are remedial courses treated for SAP purposes?

Answer: 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.).

ROUNDING



Question: If a student's pace of completion is 66.5% and a school requires a student to have a 67% pace in order to meet its quantitative measurement, can the school choose to round the pace of completion up to 67%?

Answer: Yes. Schools may use standard rounding rules when calculating percentages under any SAP measurement, including quantitative and qualitative measurements. Whether a school decides to round its SAP measurements or not, rounding requirements should be denoted in the school's SAP policy.

MAXIMUM TIME FRAME

Question: At what point does a student fail an institution's maximum time frame allowed for under its SAP policy?

Answer: Maximum time frame, which must be measured at each official SAP evaluation point, is failed by a student at the formal SAP evaluation checkpoint when the student can *no longer complete their academic program within the maximum time frame*, NOT at the point when the student actually reaches the maximum time frame. Therefore, a student can end up failing the maximum time frame several payment periods prior to the actual maximum time frame hours/weeks.

STUDENT ELIGIBILITY

Question: If a student fails SAP at the end of a payment period and becomes ineligible for *Title IV* aid in the next payment period, can the school still provide a late disbursement of *Title IV* aid for coursework associated with the previous payment period?

Answer: Yes, assuming the student meets all of the late disbursement requirements. SAP is forward looking and impacts student eligibility in the subsequent payment period. As long as the student was otherwise eligible for *Title IV* aid and was meeting SAP during the previous payment period, the school may make a late disbursement of *Title IV* aid within the late disbursement guidelines.

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 is placed on probation, they are eligible for *Title IV* aid back to the beginning of the payment period in which the appeal was approved. This is true for all *Title IV* programs, including Direct Loans.

However, if an appeal is approved AFTER a payment period has ended, the student is not eligible for any *Title IV* aid in the payment period that just ended. Instead, the student becomes eligible for *Title IV* in the next payment period.

REGAINING ELIGIBILITY

Question: If a student fails SAP and then sits out for a payment period or is required to pay cash for a payment period, can the student automatically reestablish their *Title IV* aid eligibility in the subsequent payment period?

Answer: No. Simply sitting out or paying cash for a period of time does not alter the student's SAP status. A student's SAP status is changed by improving their individual measurements over time so that they can meet the general SAP standards outlined in the institution's SAP policy.

APPEALS

Question: Can a student appeal any measurement within an SAP policy?



Answer: Yes, if the institution's SAP policy permits it. Depending on the institution's policy, all measurements within an institution's SAP policy can be appealed, including maximum time frame. A school must ensure that any appeal procedures and requirements are clearly outlined in its SAP policy.

APPEALS

Question: How many times may a student appeal a failure to make SAP?

Answer: The regulations do not limit the number of times a student may appeal (though an institution may impose limits). If an institution permits appeals, the policy must describe:

- how the student may reestablish his or her eligibility to receive *Title IV* aid;
- the basis on which a student may file an appeal (such as the death of a relative, an injury or illness of the student, or other special circumstances);
- the information the student must submit to support the appeal;
- why the student failed to make SAP; and
- what has changed to allow the student to meet SAP at the next evaluation.

ACADEMIC PLANS

Question: Does a school have to develop or offer academic plans to students on probation?

Answer: No. However, if the school does not offer academic plans, then the only way a student can be placed on probation after a successful appeal is if it is mathematically possible for the student to meet the general SAP standards by the end of the probation period (one payment period).

Please note: If a school chooses to develop an academic plan, the Department does not dictate which office(s) must develop or oversee the plan, or what requirements must be included in the academic plan.

APPEALS AND ACADEMIC PLANS

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

Answer: Yes. The regulations are silent on what conditions must or can be included in a school's appeal process or academic plan. The school will have to outline the workshop process in its SAP policy if it determines it wants to use it in its appeal process or academic plans.

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 an institution should use a 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; the deadline needs to be a finite point in time.

SAP EVALUATIONS

Question: If a student who failed SAP later self-identifies that they now meet the SAP standards at a point *prior* to an official SAP evaluation/checkpoint, can the institution do an impromptu review and update the student's SAP status?

Answer: No. The institution can only make formal SAP determinations and take action with a student's *Title IV* eligibility during an official SAP evaluation checkpoint at the end of a payment period. Any updates or changes to a student's SAP status can only be made during official SAP evaluations.

SAP CHECKLIST



SAP POLICY CHECKLIST – REQUIRED ELEMENTS

- Qualitative measurement (e.g., GPA, grade report)
- Quantitative measurement (pace of completion)
 - Nonterm credit and clock hour program exceptions under new regulations
- Maximum timeframe (no more than 150% for undergraduate programs)
- As strict or stricter than other school policies
- Measurements are cumulative
- Incompletes, withdrawals, repetitions, and transfer credit are addressed
- Formal SAP evaluations correspond to the end of a payment period
- Programs greater than an academic year, SAP checked at least annually

SAP POLICY CHECKLIST – REQUIRED ELEMENTS

- ❑ Programs equal to or less than an academic year, SAP checked at the end of every payment period
- ❑ Notify student of results of any SAP review that impacts student's *Title IV* eligibility
- ❑ Regardless of appeal process, school must always describe how a student who has lost *Title IV* aid due to failing SAP can reestablish eligibility for *Title IV* aid
- ❑ Remedial coursework must be factored into a qualitative measurement but is not required to be included in the quantitative measurement
- ❑ For programs greater than two academic years, the school must check the qualitative measure at the end of the second academic year
 - Student must have a “C” or its equivalent, or have an academic standing consistent with the institution's requirements for graduation.

SAP POLICY CHECKLIST – OPTIONAL ELEMENTS

- Warning period (can only be used if check SAP each payment period)
- Appeal process/probationary periods
- Academic plans (only occur with successful appeals)
- Different SAP policies for different categories of students (e.g., undergraduate vs. graduate, different programs)
- Impact of changing major or program

Reminder! A school can always be more restrictive and include additional elements or create more restrictive measurements.

QUESTIONS?

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Please send your inquiries about the general administration of the *Title IV* programs to 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.