

# SATISFACTORY ACADEMIC PROGRESS -- Here Today, Changed Tomorrow!



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## Resources/References

- October 29, 2010 Final Federal Register
  - Program Integrity Regulations
- 668.16, 668.34 (SAP)
- *Electronic Announcement - September 2, 2011*
  - Policy Q & A Webpage on program integrity regs
  - <http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/integrity-qa.html>

## Satisfactory Academic Progress

- Consolidates SAP regulations
- Describes all of required elements of a satisfactory academic progress policy
- Retains institutional flexibility to set policy
  - Such as evaluating categories of students differently
- Additional flexibility allowed for institutions that monitor SAP more frequently than annual requirement

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## SAP Policy

- Policy must include the following:
  - Pace of progression required to insure student completes within maximum time frame
  - Measurement of student's progress at each evaluation
  - Calculate pace at which 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
      - *More guidance is coming on pace of progression for clock hour programs*

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## Q & A

SAP-Q7: Can the SAP pace requirements be different for students at different points in academic program?

SAP-A7: Yes. An institution may use a different pace standard for students in different grade levels. This could result in the pace gradually becoming more strict. For example, the institution may use a 50% pace for first year students, a 65% pace for second year students, and an 85% pace for third and fourth year students, rather than using a flat 67% pace for each year.

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## SAP Policy

- Policy must include the following:
  - How student's GPA and pace of completion affected by incompletes, withdrawals, repetitions, or transfers of credits
    - Transfer credits accepted toward completion of student's program must count as both hours attempted and hours completed
  - Student's SAP evaluations must occur at end of a payment period

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## SAP Policy

- Clock hour evaluation periods:
  - Review SAP at end of a payment period by selecting one of the following options for *all students in a program*:
    - Point when scheduled hours elapsed (regardless if attended hours); or
    - Point when student has attended all scheduled clock hours; or
    - Point when student has *successfully completed* all scheduled clock hours in payment period
- Electronic Announcement - June 6, 2011

## Q & A

SAP-Q6: SAP regulations require credit hours accepted toward student's program count as both attempted and completed when calculating GPA and 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.

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

## Q & A

SAP-Q5: How should an institution handle changes of majors?

SAP-A5: The treatment of a student who changes majors is determined by the institution and should be specified in its SAP policy. An institution *may* specify in its SAP policy that it will include coursework taken by a student for enrollment in other majors.

## Q & A

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.)

## Monitoring SAP Each Payment Period

- In general, student who is not making SAP is no longer eligible for Title IV aid
- For an institution that chooses to evaluate SAP at the end of each payment period, “financial aid warning” status *may* be used
  - Student may continue to receive Title IV aid for *one payment period*
  - No appeal necessary
  - Possible for student to receive more than one warning period during academic career just NOT sequentially

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## Q & A

R-Q4: If an institution reviews SAP each payment period, must the institution also review SAP after a summer term?

R-A4: If an institution reviews SAP each payment period, the institution must review SAP after a summer term if the student attends the summer term.

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## Monitoring SAP

- If measure each payment period –
  - The 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
- If evaluate SAP annually or less often than each payment period
  - When student loses eligibility for Title IV aid
    - May be placed on Financial Aid Probation

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## Q & A

SAP-Q2: Must schools adopt the terminology, such as warning and probation, used in the regulations?

SAP-A2: Yes. To the extent that your institution uses the statuses we describe in the new regulations, it must use the terminology in the regulations.

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## Monitoring SAP

- If on Financial Aid Warning -
  - After 1 payment period, student must make SAP;  
or
  - *May* be placed on Probation after successful appeal
- To be placed on Probation
  - 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

## Q & A

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.

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## Q & A

ACP-Q1: How should an institution develop an academic plan?

ACP-A1: The regulations do not specify what must be included in an academic plan. The institution and the student should develop a plan that ensures that the student is able to meet the institution's SAP standards by a specific point in time.

- Could be out to program completion; or
- Future point where meet SAP standards

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## Q & A

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

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## Q & A

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.

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## Monitoring SAP

- 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

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## Q & A

ACP-Q2: What is the status of a student who has completed the probationary payment period and who is continuing to receive aid by *meeting the requirements of the student's academic plan*?

ACP-A2: A student who has been reinstated to eligibility under an academic plan and is making progress under that plan is considered to be an eligible student.

- May be evaluated at the same time as other TIV recipients or at more frequent periods based on plan

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## Q & A

PROB-Q2: After one payment period on probation, student still not making SAP, can student be automatically put on an academic plan, or must the student appeal again?

PROB-A2: The student would have to successfully appeal to be placed on a plan. The institution would need information about why the student failed to make SAP at the end of the probation payment period, including what had changed that caused the student to not make SAP during the probationary payment period and why the student will be able to meet SAP on the terms of the academic plan.

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## SAP Policy - Appeal

- 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
- Federal Register reminds schools that 150% maximum timeframe can be appealed

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## SAP – 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
  - *If institution does not have an appeal process*, must describe how a student who has failed SAP can reestablish eligibility for Title IV aid

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## SAP Implementation

- 2011 Summer crossover payment period
  - School may choose to use current SAP policy or any new SAP policy based on new regulations
- Must publicize any changes to students and state when any new SAP policy is effective

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## Q & A

R-Q3: If a student is on SAP probation when the new SAP regulations become effective, when must the student be evaluated?

R-A3: If the student was placed on probation under the prior regulations, the student is evaluated at the institution's next regular evaluation point under the new regulations. If the student is not making SAP at that evaluation, the appropriate action depends on how frequently the institution measures progress – every payment period (warning) or less frequently (appeal/probation).

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**Feedback on Training**

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