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2016–17



Satisfactory Academic Progress: From Policy to Application

Instructor's Guide



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NATIONAL ASSOCIATION OF STUDENT FINANCIAL AID ADMINISTRATORS

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October 2016



Satisfactory Academic Progress: From Policy to Application

TIME: 3 hours

- OBJECTIVES: Participants will be able to:
- Understand the basic standards that a school must include in its satisfactory academic progress policy;
 - Assess their school's existing satisfactory academic progress policy and determine if adjustments are appropriate;
 - Recognize choices that a school has in determining specific aspects of a school's satisfactory academic progress policy;
 - Identify situations that may or may not warrant the extension of utilizing a financial aid warning, financial aid probation, or academic plan; and
 - Understand SAP consumer information requirements and what must be provided to prospective and currently enrolled students.

- SECTIONS:
- I – Introduction
 - II – Regulatory Requirements
 - III – SAP Policy Standards
 - IV – Evaluating SAP
 - V – Monitoring SAP
 - VI – Consumer Information Requirements
 - VII – Conclusion

This training has been developed with opportunities for discussion with the participants, including instructor led reviews of examples and group discussions about selected topics. Instructors will need to plan effectively regarding the proper use of participants' time, including leaving time to answer participant questions about the content covered during the training. The matrix below provides an overview of the training materials with time recommendations to assist the instructor in effective time management for this workshop.

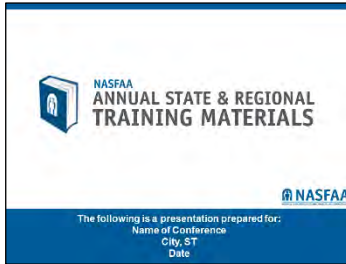
Section	Time Suggestion
I. Introduction	10 minutes
II. Regulatory Requirements	15 minutes
III. SAP Policy Standards	40 minutes – <i>Group discussion encouraged</i>
IV. Evaluating SAP	50 minutes – <i>Group discussion encouraged</i>
V. Monitoring SAP	45 minutes – <i>Group discussion encouraged</i>
VI. Consumer Information Requirements	10 minutes
VII. Conclusion	10 minutes



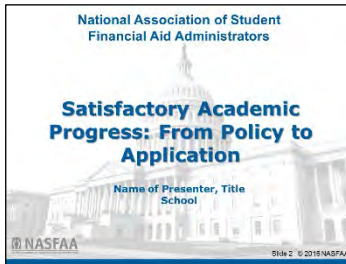
- MATERIALS:**
- PowerPoint Presentation
 - Participant Handout
- RESOURCES:**
- 34 CFR 668 Sections 668.16(e), 668.32(f), 668.34
 - Federal Register*, 10/29/10, pp. 66879 to 66887 – Program Integrity Issues; Final Rule
 - Electronic Announcement, 09/02/11 – Program Integrity Information - Questions and Answers
 - Electronic Announcement, 06/06/11 – Satisfactory Academic Progress Reviews for Students in Clock Hour Programs
 - 2016–17 *FSA Handbook*, Volume 1
 - ED Program Integrity Information – Questions and Answers – Satisfactory Academic Progress, available at <http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/sap.html>
 - FSA Assessments, Student Eligibility
 - NASFAA Policies & Procedures Tools
 - NASFAA *Self-Evaluation Guide*
 - Satisfactory Academic Progress*, NASFAA Monograph 25, August 2012



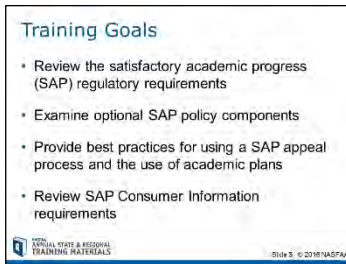
SLIDE 1



SLIDE 2



SLIDE 3



I. Introduction

- Welcome
- Introductions of presenters
- Housekeeping
- *Participant Handout*
 - Briefly review the contents of the *Participant Handout* and mention that it will be referred to throughout the training.

Training Goals

Satisfactory Academic Progress (SAP) is about ensuring students are able to complete their academic program in a timely manner while achieving a minimum academic standard. In an age of increasing accountability of the use of Federal Student Aid funds (and other Federal, State, and Institutional funds), institutions **and** students must demonstrate that financial aid funds are being used to assist students in completing their academic goals in the most efficient way.

The workshop is designed to:

- Review regulatory requirements to enable participants to re-evaluate their school's satisfactory academic progress (SAP) policy to determine if it complies with these requirements

Although the SAP regulations contain standardized definitions, it permits schools some level of some flexibility regarding institutional SAP policies on their campuses
- Discuss options that exist for schools

In today's workshop, these options will be identified and participants will be able to discuss these options and compare it to how other schools treat them.
- Examine the application of SAP standards using examples for:
 - Qualitative measures
 - Quantitative measures
 - Academic plans
- Finally, SAP consumer information requirements
 - We will review what information must be available to prospective and enrolled students.



Note to Instructor: The current SAP regulations became effective on 7/1/11. According to the U.S. Department of Education (ED), there are institutions that are not meeting the minimum requirements for compliance. Because of this, schools should periodically review their SAP policy for compliance.

SLIDE 4



SLIDE 5



II. Regulatory Requirements

What is Satisfactory Academic Progress?

- It is an aspect of the general student eligibility requirements found in 34 CFR 668 Subpart C [specifically 34 CFR 668.16(e), 668.32(f), and 668.34].
 - The purpose of SAP is to ensure that students are able to complete their academic program in a timely manner while achieving a minimum standard.
- Schools must establish a SAP policy to measure a student's progress in her educational program.
 - The progress required of a Title IV recipient in acceptable studies or other activities to fulfill a specified educational objective
 - It is made up of two types of standards:
 - Qualitative
 - Quantitative
 - Students are evaluated on these two standards:
 - Meeting these standards allows a student to receive Title IV aid
 - Not meeting these standards means that the student is considered ineligible for Title IV aid
- Although the SAP regulations provide specific requirements that must be included in a school's SAP policy, schools do have options regarding some aspects. These options are addressed in the workshop.

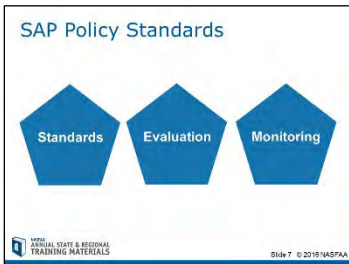
Note to Instructor: 34 CFR Sections 668.16(e), 668.32(f) and 668.34 can be found in the Participant Handout on page 1.



SLIDE 6



SLIDE 7



SLIDE 8



III. SAP Policy Standards

SAP Policy Standards (continued)

To be eligible for Federal Student Aid funds, a student must make satisfactory academic progress; and your school must have a reasonable policy for monitoring that progress.

Schools must establish a *reasonable* SAP policy to determine if a student is on track to complete his program of studies in a timely manner. In order to do this, it must meet criteria outline in the regulations, include an evaluation and assessment process, and provide options for a student who is considered not meeting SAP.

- Requirements
- Evaluation
- Monitoring

Schools have flexibility to develop and implement a SAP policy compliant with minimum requirements established in federal regulations, while also addressing the school’s mission and goals. However, the SAP policy must be applicable to all students seeking any type of Title IV aid.

SAP Policy Standards (continued)

The regulations provide the outline for the SAP policy; schools are responsible for filling in the details.

- Must be reasonable

A SAP policy is considered reasonable if it contains the following requirements:

- As strict or stricter

A school’s SAP policy must be the same as or stricter than the academic policy it applies to non-Title IV recipients. It refers to the actual measurements that the school uses to monitor qualitative and quantitative standards, e.g., grade point average (GPA) and pace.

It doesn’t refer to the timing or frequency that the school checks a student’s progress. This means that a school’s academics may review a student’s GPA each term and financial aid may review GPA for SAP annually.



SLIDE 9

Example: At Least As Strict As

Center City University's has a minimum academic requirement of a 2.5 grade point average to remain enrolled in the business program. Other programs require a 2.0 grade point average.

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SLIDE 10

Program Integrity Q&A – SAP

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.

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SLIDE 11

Evaluating SAP

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SLIDE 12

SAP Policy – Evaluation



- Measurement towards the completion of a program
- Must be cumulative
- May be a fixed or graduated standard

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- Consistently applied to categories of students according to the student's:
 - Enrollment level (full-time or part-time)
 - Classification (undergraduate or graduate)
 - Educational program

Schools may have different SAP standards for different educational programs of study, as long as students in the same program of study are assessed consistently.

Example: At Least As Strict As

- Center City University's has a minimum academic requirement of a 2.5 grade point average (GPA) to remain enrolled in the business program. Other programs require a 2.0 grade point average.

Ask: What must Center City University's Title IV SAP policy standard be?

Answer: The school's Title IV SAP policy for business students must be at least as strict as the academic standard, 2.5 GPA, or stricter. The school's Title IV SAP policy for other programs may be equal to the regulatory requirement, 2.0 GPA, or stricter if the school chooses.

The next slide explains why this is the case.

Program Integrity Q&A – SAP

Question SAP-Q9 asks whether a school must use the same SAP policy for all students. According to the answer, SAP-A9, schools may use the same policy for all students or may use different policies for different programs or a category of students as long as it is applied consistently to all students in that program or category.

IV. Evaluating SAP

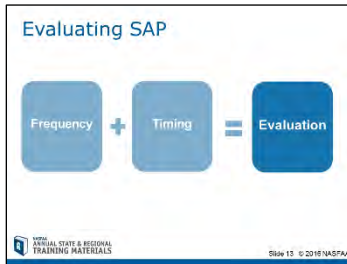
SAP Policy – Evaluation

A school's SAP policy must provide for evaluation of academic progress at specific points in the program and state when it will occur.

- During each evaluation, you are measuring the student's progression towards the completion of his or her program
- The evaluation must be cumulative and include specific standards
- These standards may be fixed or graduated



SLIDE 13



Evaluating SAP

There are two things that must be considered when evaluating SAP, how often and when.

- Frequency

There are several factors that may influence a school's decision regarding how frequently it will evaluate SAP. These factors may include:

- Academic calendar
- Appeals process
- Level of campus involvement
- Capabilities of its financial aid management system
- Available resources
- Staffing
- Student body characteristics

Note to Instructor: Ask participants to review the Considerations for Frequency of SAP Evaluations on page 9. This document addresses issues a school should consider as it decides how frequently it will evaluate SAP. Ask participants if there is an issue/consideration listed that presents a challenge for their school.

- Timing

The timing of the evaluation depends on the type of academic program the student is enrolled in:

- For programs shorter than an academic year in length, including programs which are one academic year in length, the evaluation must occur at the end of each payment period.
- For programs longer than an academic year in length, the evaluation may occur annually, meaning once every 12 months, or at the end of each payment period.

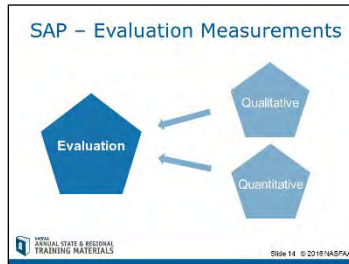
For clock-hour programs, the evaluation occurs:

- When the student's scheduled clock hours for the payment period have elapsed, regardless of whether the student attended them;
- When the student has attended the scheduled clock hours; or
- When the student successfully completes the scheduled clock hours for that payment period.

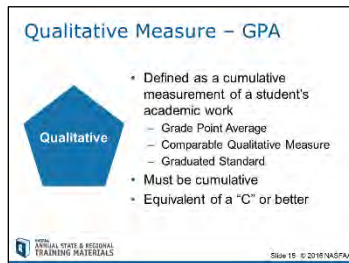
So, what is a school required to evaluate?



SLIDE 14



SLIDE 15



SAP Policy – Evaluation Measurements

There are two types of standards that must be evaluated.

- Qualitative
- Quantitative

There are other factors to consider when evaluating these standards that will be discussed later.

A SAP review is not complete until the school evaluates whether the student satisfies both the policy's qualitative and quantitative standards.

Qualitative Measure – GPA

This measure assesses a level of subject mastery a student possesses at the conclusion of a course.

- Defined as a cumulative measurement of the quality of a student's academic work or academic achievement. There are two ways that this measurement can be expressed:
 - Grade Point Average (GPA)

The GPA is the measurement that accesses the quality of the student's academic work against standards or a norm.

 - If a school has a policy that allows for academic amnesty. Typically, when this policy is applied, credit or the grade received for this course is excluded from a student's GPA. Although an academic amnesty policy may exist, it cannot be observed when evaluating SAP. This means that the evaluation must always include courses considered to be a part of the student's program of study, regardless of when the course was taken.
 - Comparable Qualitative Measure

Some schools do not use GPA to measure academic achievement. These schools must define their SAP policy as a comparable qualitative measurement against a norm.

 - Alternatives may include:
 - Badges
 - Trophies (gamification)
 - Standard-based reporting
 - Pass/fail
 - Nonpoint based rubrics
 - Graduated Standard

A school may establish and use a graduated GPA standard, however, additional provisions, apply if the student's academic program is longer than two academic years.



- This assessment must be cumulative
 - This means the previous work that a student has completed that the school uses to determine the cumulative GPA must be used.
 - There are circumstances when schools have the option to include or exclude coursework in this cumulative assessment.
 - When a change occurs in a student’s program of study (major)
 - When a student transfers credit from another school

In these circumstances, the student may have taken courses that are no longer applicable to the current program of study. Schools must determine how such courses impact a student’s evaluation of SAP.

- Equivalent of a “C” or better

At the end of the second academic year means after the student has been at the school for two academic years (such as 4 semesters or 6 quarters) regardless of the student’s enrollment status.

If a term-based program’s policy is not to check SAP each payment period, still must check whether student has a “C” GPA or academic standing consistent with requirements for graduation at the end of the student’s second academic year—i.e., must do this even though the quantitative standard does not have to be checked until the next regular review when all SAP standards are measured.

Note to Instructor: ED addresses changes in majors and non-accepted credits on the Program Integrity Questions & Answers – Satisfactory Academic Progress, online at <http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/sap.html>

Change in majors is addressed in SAP-Q5/SAP-A5. Non-accepted credits is addressed in SAP-Q6/SAP-A6.

SLIDE 16

Case Study 1: Liam

- Cumulative GPA of at least 2.0
- SAP review after each semester

Course	Grade	Total Grade Points
English	C	6
Physics	A	12
American Government	B	9
Organic Chemistry	B	9
Calculus I	A	12
		GPA = 3.4

Met GPA requirement

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Case Study 1: Liam

- Review how GPA is calculated for Liam at Riverbank University
 - Using a four-point scale, grades are assigned a point value which is then multiplied by the number of credits a course is assigned to calculate the total grade points for each enrolled course. The point value assigned to each grade is as follows:

Grade	Point Value
A	4
B	3
C	2
D	1
F	0

- Point out is meeting the SAP standard because his calculated GPA exceeds Riverbank’s expectation of at least 2.0



SLIDE 17

Case Study 2: Olivia

Policy	Term	Minimum GPA
Graduated Standard	1	1.5
	2	1.8
	3 and subsequent	2.0

Olivia	Term	Total Grade Points	Cumulative GPA
Graduated Standard	1	18	1.50
	2	39	1.86
	3	60	2.22

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➔ Refer participants to page 3 in the Participant Handout as you review Case Study 1: Liam.

Case Study 2: Olivia

- Review Cedar Cove Community College’s graduated GPA standards listed on the slide
- Compare this graduated standard to Olivia’s cumulative GPA based on each completed term
- Point out her school’s graduated policy enabled Olivia to retain aid eligibility while she worked on improving her GPA

➔ Refer participants to page 3 in the Participant Handout as you review Case Study 2: Olivia.

Group Discussion:

Ask if any participants use a graduated standard at their schools? What are the benefits of using a graduated standard? What are the drawbacks?

SLIDE 18

Case Study 3: Addison

- Fixed qualitative standard of at least 2.0
- Annual SAP review

Term	Total Grade Points	Cumulative GPA
Fall 2016	36	3.00
Spring 2017	66	2.44
Fall 2017	75	2.08
Spring 2018	87	1.93

Not making SAP after two years

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Case Study 3: Addison

- The table on the slide reflects Addison’s cumulative GPA for the first two years of enrollment at Achievement University
- Review how she is affected by the requirement of possessing a GPA equivalent to a “C” or better

Although Addison had a 3.0 GPA after the first payment period, her academic performance was poorer after each subsequent term.

After being enrolled at Achievement University for two years, Addison is not meeting the requirement to have a GPA equivalent to a “C” or better.

- Point out Addison is not meeting this requirement by the end of her second year

➔ Refer participants to page 3 in the Participant Handout as you review Case Study 3: Addison.

SLIDE 19

Case Study 4: Jaxon

Policy	Number of Badges Earned	Academic Achievement Level
Comparable Measure	12	Outstanding
	10-11	Good
	6-7	Acceptable
	5 or Fewer	Unacceptable

Jaxon	Payment Period	Badges Earned	Cumulative Badges	Cumulative Achievement Percentage
Comparable Measure	1	11	11	91.7
	2	10	21	87.5
	3	8	29	80.0
	4	12	41	85.4

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Case Study 4: Jaxon


- Innovative Institute uses badges as a measure of academic achievement
- Review how the use of a comparable measure is practiced for Jaxon at Innovative Institute as represented on the first table on the slide (which is included in the Participant Handout)
- Review the number of badges Jaxon earns each payment period and describe how the cumulative achievement calculation is determined

➔ Refer participants to page 4 in the Participant Handout as you review Case Study 4: Jaxon.



SLIDE 20

Quantitative Component – Pace



Progression to ensure completion within the maximum timeframe

- Must be measured at each evaluation
- Graduated pace standard is permitted

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Quantitative Component – Pace

- Pace is the rate at which a student must progress through her educational program of study to ensure completing the educational program within the maximum time frame.
- Although a school may use a flat standard or graduated standards to measure pace, the school must evaluate the student’s pace at each evaluation.

Note to Instructor: Schools use either a flat percentage or a graduated percentage of the coursework to be completed over the program’s maximum time frame. If a flat percentage is used, divide the total number of hours needed to complete the program by the number of payment periods the student would complete to reach the maximum time frame. For example, suppose a student is enrolled in a 4-year, 120 credit-hour program. In this example, the semester is the payment period, and the maximum time frame is 6 payment periods (i.e., 150% of the published time for completing the program). If you divide the 120 credit hours by 6, the student must complete at least 20 credits each payment period in order to complete the program within the maximum time frame.

If a graduated percentage is used, the percentage that must be completed each payment period increases as the student progresses within the program and varies from school to school. A school could set a different percentage for each payment period or for year of the program. Note, the percentage represents the minimum hours the student needs to complete the program within the maximum time frame. Thus, in establishing each percentage, the school needs to make sure that it’s possible for a student to complete the program within the maximum time frame should the student complete only the minimum hours each payment period.

SLIDE 21

Quantitative Component – Pace




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Quantitative Component – Pace

- Pace is calculated by:
 - Dividing the cumulative number of hours the student has successfully completed by the cumulative number of hours the student has attempted
 - For clock hours you are evaluating cumulative clock hours required to complete as expressed in calendar time

SLIDE 22

Quantitative Component – Maximum Timeframe



Amount of time allowed to complete an educational program

- Must be measured at each evaluation
- Graduated pace standard is permitted

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Quantitative Component – Maximum Timeframe

The maximum timeframe is the amount of time, measured in either credit or clock hours, that is allowed for a student to complete an educational program.

- In order for the SAP evaluation to be considered complete, both the qualitative and quantitative components must be measured at each evaluation
- Institutions may use a graduated pace standard for all students or it may be different according to student classification or program of study



SLIDE 23

Quantitative Component – Maximum Timeframe

- Limits
 - Undergraduate programs
 - Graduate programs
- Schools still free to set own policies related to number of changes in major allowed
- Considered ineligible when determines that cannot meet maximum timeframe

Quantitative

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Quantitative Component – Maximum Timeframe

- Maximum timeframe limits may differ according to student classification
 - Undergraduate programs
 - 150% of the published program length or less for undergraduate programs
 - Discuss the following example that describes how to determine pace:
 - A bachelor's degree program requires 120 credits for completion
 - $120 \times 150\% = 180$ attempted credits is maximum timeframe
 - $120 \text{ credits} / 180 \text{ credits} = 67\%$
 - Student must earn 67% of credit hours attempted
 - Graduate programs
 - School determine based on the length of the program
- Schools are still free to set own policies related to number of changes in program of study (major) a student is allowed
- A student is considered ineligible when the school determines that the student cannot meet maximum timeframe standard

Example: A school evaluates SAP at the end of a payment period. At this point in time, the student has attempted 150 credit hours. The maximum timeframe for the program is 180 credit hours. The student has 35 credit hours left to earn to complete his degree. Because he has more credit hours to earn than what is allowed to graduate, he is considered not be meeting SAP.

SLIDE 24

Case Study 5: Skylar

Term	Completed Credits	Attempted Credits
Fall 2016	9	12
Spring 2017	9	12
Summer 2017	6	6
Fall 2017	9	12
Spring 2018	12	12

45 Hours Earned
54 Hours Attempted = 83%

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Case Study 5: Skylar

- Review how pace is calculated for Skylar at Amber Hills University
- Point out the credits completed and attempted each term she is enrolled
- Discuss how the pace calculation is applied
- Compare her calculated pace to her school's standard

➔ Refer participants to page 4 in the Participant Handout as you review Case Study 5: Skylar.

SLIDE 25

Case Study 6: Grayson

Policy	Terms	Number of Attempted Credits	Pace
Graduated Standard	1	0-15	60%
	2	16-30	65%
	Remaining Terms	31 or more	70%

Grayson	Term	Completed Credits	Attempted Credits	Pace
Graduated Standard	Fall 2016	9	15	60%
	Spring 2017	11	15	67%
	Summer 2017	6	9	67%

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Case Study 6: Grayson

- Review Blue Lake Community College's SAP policy, which uses a graduated standard (which is included in the Participant Handout)
- Compare Grayson's actual pace to his school's standard
- Indicate that Grayson is no longer making SAP after his third term
- As a result of not meeting the SAP standard, Grayson will be placed on financial aid warning for the next term. Point out that because SAP is evaluated at the end of each payment period, he will need to complete 70% of the courses he takes during the next payment period in order to meet the SAP standard.



SLIDE 26

Case Study 7: Wyatt

Term	Earned Credits	Attempted Credits	Pace	Total Credits Earned
Fall 2016	6	12		30
Spring 2017	12	18	80%	48

• Pace expectation is 67% at each review
• Annual review after spring semester

60 credits → 30 credits

Obsidian Junior College → North Point University

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Note to Instructor: Remember that all coursework must be included in the calculation, even optional summer terms and intersessions.

➔ Refer participants to page 5 in the Participant Handout as you review Case Study 6: Grayson.

Case Study 7: Wyatt

- Note that Wyatt's new school, North Point University (NPU), accepted 30 out of 60 credit hours he completed at his prior school, Obsidian Junior College
- NPU's policy expects a minimum pace of 65% at each annual review after spring semester
- Wyatt is making SAP because his transfer credits resulted in a pace of 80%
- Without his transfer credits, his pace would be only 60%

➔ Refer participants to page 6 in the Participant Handout as you review Case Study 7: Wyatt.

SLIDE 27

Case Study 8: Penelope

Completed Clock Hours	Scheduled Clock Hours	Pace
328	450	72%

• Program length:
– 900 clock hours
– 32 weeks

• Pace expectation is 67%

• Review after first payment period:
– Completion of 450 clock hours and 16 weeks

At 16 weeks, her pace exceeds 67%, but she has not yet completed the first payment period.

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Case Study 8: Penelope

- Note that Penelope's program at Empire Edge Institute is 1600 clock hours and 46 weeks in length, which is longer than an academic year.
- Empire Edge's SAP policy expects a minimum pace of 67% when progress. The school evaluates at end of the payment period, which is half of the academic year, not halfway through the program.
- First payment period ends at completion of 450 hours and 16 weeks
- Point out that, at 16 weeks, Penelope appears to be on track for pace (72% compared to 67% expectation)
- Since Empire Edge defines a payment period as 450 clock hours, her payment period is extended until she completes these clock hours

➔ Refer participants to page 6 in the Participant Handout as you review Case Study 8: Penelope.

SLIDE 28

Additional SAP Policy Elements

School policy required

- Withdrawals and nonattendance
- Incomplete courses or grades
- Repeated coursework
- Transfer hours
- Remedial Coursework

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Additional SAP Policy Elements

There are several circumstances that may occur during a student's academic career that impact a student's progress towards program completion. Because of this, in addition to the how and when a student's performance is evaluated, the following must be addressed in a school's SAP policy:

- Withdrawals and nonattendance
 - Although no credit are assigned to withdrawals and nonattendance, which may be the result of an administrative withdrawal, these credits must be accounted for in a student's attempted hours ratio.
- Incomplete courses or grades
 - When a student is unable to fulfill or finish the requirements of a course, an incomplete grade may be given. Incomplete courses or grades count in the earned-hours-to-attempted-hours ratio. This can be a challenge for schools because incomplete grades typically convert to a grade later.



The SAP policy must address how the incomplete grade will impact the student and a monitoring process relating to such grades.

- Repeated coursework
 - It is not unusual to have a student repeat coursework to enable the course to apply towards program completion or to improve on a previously received grade. Because of this, a school's policy must also address the impact of repeated coursework on the student's pace towards degree completion.
- Transfer hours
 - Schools have a choice regarding how it counts transfer credit hours. If the transfer credit hours are accepted as part of the student's program of study, they also must count as both attempted and completed hours.
- Remedial Coursework
 - Remedial coursework is offered to improve a student's proficiency in order to pursue a postsecondary certificate or degree. These courses typically do not fulfill requirements for a program of study. There are two types of remedial coursework, noncredit and reduced credit. Regulations do not require that remedial coursework be included in the calculation of SAP.

SLIDE 29

Additional SAP Policy Elements

School policy required

- Audited Courses
- Pass or Fail Courses
- English as a Second Language
- Continuing Education or Enrichment Courses
- Comprehensive Transition and Postsecondary Program

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Additional SAP Policy Elements

- Audited Courses
 - Audited courses do not count towards a student's degree. If a student enrolls in an audited course, it may extend the amount of time she needed to complete a program of study.
- Pass or Fail Courses
 - These courses may or may count towards a student's degree. Schools must determine how these courses are counted for both GPA and pace.
- English as a Second Language
 - English as a Second Language (ESL) is considered remedial coursework. The regulations do not require that ESL courses be included in the calculation of SAP.
- Continuing Education or Enrichment Courses
 - These courses may be available to degree-seeking and nondegree-seeking students. Schools must determine how these courses are evaluated for SAP purposes.
- Comprehensive Transition and Postsecondary Program
 - If offered, the school must define SAP for students enrolled in this type of program.



SLIDE 30

Additional SAP Policy Elements

School must determine SAP treatment

- Multiple Degrees or Credentials
- Double Majors
- Change of Program
- Academic Amnesty

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Additional SAP Policy Elements

- Multiple Degrees or Credentials
 - Schools must determine how to treat additional degrees or credentials. Credits that are applicable to multiple programs must be counted as credits attempted and completed.
- Double Majors
 - Schools must determine how the pursuit of a double major will impact pace for SAP purposes because it may take longer for the student to complete the academic program.
- Change of Program
 - Changing majors can impact a student's completion of a degree. Schools must determine how previously taken courses that are not applicable to the student's current program of study are treated.
- Academic Amnesty
 - A school may allow, under certain circumstances, grades to be excluded from the calculation of the GPA. The regulations do not allow for exclusion of grades received and all grades that are applicable to a student's program of study must be included in the SAP evaluation.

SLIDE 31

Consequences of Not Meeting SAP Standards

School must determine SAP treatment

- Failure to attain SAP will result in immediate loss of Title IV aid eligibility
- Eligibility may be regained:
 - Pay for classes
 - Successfully appeal

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Consequences of Not Meeting SAP Standards

- Failure to attain SAP will result in immediate loss of Title IV aid eligibility
 - When a student does not meet the qualitative and/or quantitative SAP standards are ineligible for additional Title IV aid from the date the school determines the student is not meeting these standards.
- Eligibility may be regained:

In some cases, a student who is not meeting SAP may regain eligibility for Title IV aid. Options may include the following:

- Pay for classes

By paying for classes on his own, a student may be able to raise his grade point average (or qualitative equivalent) and increase his pace of completion.
- Successfully appeal


Another way to regain eligibility is to submit an appeal; if the school's SAP policy includes an appeal process. If the appeal is approved, the student regains eligibility for Title IV aid while working to meet the SAP standards.



SLIDE 32

Re-Establishing Eligibility

- Notification to students
- Methods for re-establishing eligibility
 - Permissible vs. impermissible



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Re-Establishing Eligibility

- There are certain notification requirements related to SAP:
 - Schools must notify the student of results of SAP review that impacts student's eligibility for Title IV aid.
 - If the school has a SAP appeals process, that allows a student to present documentation to reconsider his ineligibility for Title IV aid due to not meeting SAP standards, it must describe the specific elements required to appeal a SAP determination.
 - Regardless as to whether or not an appeal process exists, the school must describe how a student who has failed SAP can reestablish eligibility for Title IV aid.
- Permissible vs. impermissible
 - The following are considered permissible methods:
 - Being placed on a financial aid warning period and meeting SAP standards at that end of the warning period (if the school allows financial aid warning periods in its SAP policy);
 - Successfully appealing and being placed on financial aid probation and meeting SAP standards at the end of that probation period (if the school allows appeals and financial aid probation in its SAP policy); or
 - Successfully appealing and being placed on an academic plan, and meeting SAP standards according to the terms of that academic plan (if the school allows appeals and academic plans in its SAP policy).
 - The following is considered impermissible:
 - Attending classes without receiving Title IV aid and earning enough grades and/or credits in those classes that would allow the student to regain SAP standards on his own.

SLIDE 33

Monitoring SAP




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V. Monitoring SAP

SLIDE 34

SAP Policy - Monitoring

- Financial aid warning
- Financial aid probation
- SAP Appeals



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SAP Policy - Monitoring

Each official evaluation of SAP must include an assessment of both the qualitative and quantitative standards.

If a student is not meeting the SAP standards, there are a couple of options a school has:

- Financial aid warning
- Financial aid probation
- SAP Appeals



SLIDE 35

Financial Aid Warning

- SAP evaluated at the end of each payment period
- Student allowed to continue to receive Title IV aid for **one payment period**
- Appeal unnecessary
- Multiple warning periods are possible just NOT consecutively

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Financial Aid Warning

This status is assigned by a school to a student who is not meeting the school's SAP standards. Placing the student on financial aid warning is optional.

- A school must evaluate SAP at the end of each payment period to use the financial aid warning status
- When a student is placed on financial aid warning, she is allowed to continue to receive Title IV aid for only **one payment period**
- It is unnecessary for a student to submit a SAP appeal to be placed on financial aid warning
- It is possible for a student to be placed on financial aid warning multiple times, but the warning periods cannot be consecutive

At the conclusion of the payment period, the student placed on financial aid warning must be making SAP. If SAP standards are not met, an appeal may be filed; if the school's SAP policy permits. If the appeal is approved, the student may be placed on probation.

SLIDE 36

SAP Appeals

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SAP Appeals

This is a process by which a student who is not meeting a school's SAP standards may submit a petition for reconsideration of his eligibility for Title IV aid.

The regulations allow schools to choose whether or not it will permit SAP appeals. If the school's SAP policy allows, the student may submit a petition for reconsideration of Title IV eligibility.

The regulations also allow financial aid administrators exercise professional judgment, on a case-by-case basis, to allow a student who is not meeting SAP, the ability to continue to receive Title IV aid to continue her studies.

Note to Instructor: For more information regarding the discretion of financial aid administrators, see the Higher Education Act (HEA) of 1965, as amended, Section 484(c).

If SAP appeals are permitted, the school's policy must describe the conditions and circumstances a student may appeal; require documentation to support the basis of the appeal, and explain the appeal process.

- These conditions and circumstances may include:
 - The presence of unusual or extraordinary conditions or circumstances that affected the student's ability to meet SAP.
 - The petition must explain these mitigating circumstances and describe any changes in these conditions or circumstances which will allow the student to meet SAP at the next evaluation.
 - Possible reasons for an appeal:
 - The death of a relative;
 - An injury or illness of the student; or
 - Other special circumstances as determined by the school.



- There is no regulatory limit on number of time student can appeal SAP. However, an institution may define a limitation, which should be in school's SAP policies and procedures.

- Documentation

- Neither the regulations nor ED provide specific information regarding the documentation that must be submitted for a SAP appeal. This is at the discretion of the institution.

Note to Instructor: For more information regarding change in majors, please see the Program Integrity Questions & Answers – Satisfactory Academic Progress, APP-Q2/APP-A2.

- Processing SAP Appeals

There are a variety of ways that a school may process appeals. Some use an appeals committee composed of staff from the financial aid office or from other campus offices.

- Notification to students

- Once a decision has been made, the student must be notified of results of SAP appeal

Note to Instructor: Ask participants to review the Elements of Satisfactory Academic Progress Appeals Policies and Procedures on page 11. Is there anything listed that they may want to revisit in their own SAP policies?

Group Discussion

*How does your institution structure its appeal process? Do students have opportunity to meet with an Appeals Committee, or is written documentation only permitted? How do you educate members of your Appeals Committee on the changes to the SAP regulations to make sure that the decisions they make in the Appeals process will be current with the new regulations? How is your Appeals process situated within the institution's Appeals structure? Can a student appeal to a higher authority within the institution? At what point is an Appeals decision considered to be **final**? How is the Appeals process communicated to your students?*

Financial Aid Probation

This status is assigned by a school to a student who is not meeting the school's SAP standards and the student has successfully appealed to have his eligibility reinstated. The use of financial aid probation is optional.

- Requires an appeal that is approved by the school
- Expectation of meeting SAP at end of financial aid probation period
- Schools should use a single payment period if it is possible to meet SAP standards at the end of one payment period
- Schools should consider using multiple payment periods using an academic plan if it will take more than one payment period for the student to be compliant with the SAP standards

SLIDE 37

Financial Aid Probation

SAP evaluated annually

If student appeal is approved, have a financial aid probation term to meet minimum requirements

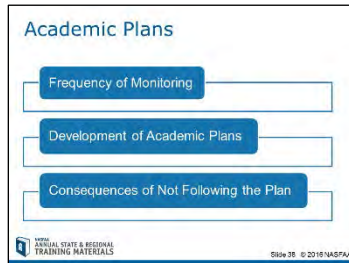
- If SAP is checked each term, student may appeal if after financial aid warning term SAP standards are not met
- Financial aid probation may be for one term or multiple terms based on an Academic Plan

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SLIDE 38



- During the probation period, a school may require the student to meet specific terms and conditions, e.g. enrollment in certain courses, the number of credits a student may enroll in, or GPA requirement

Academic Plans

Sometimes, it may be mathematically impossible for a student on financial aid probation to achieve minimum SAP standards (GPA or pace, or both) at the conclusion of one payment period. Although not required a school may choose to use academic plans for its students. This option should be included in a schools SAP policy and indicate when it will be considered.

- Frequency of Monitoring

Academic Plans should be tailored to the individual needs of the student based on the circumstances the student described in her SAP appeal. Since it covers more than one payment period, establishing checkpoints and milestones that a student must achieve is appropriate.

- Development of Academic Plans

The use of an academic plan is a great opportunity for multiple campus offices to collaborate. The objective of the Academic Plan should be to assist the student in producing academic success at each of the stipulated checkpoints and milestones of the Academic Plan, while the long-term goal of the Academic Plan should be to restore the student to proper Satisfactory Academic Progress at a specified future point in time.

Examples of elements which an institution may include in a student's Academic Plan may include but are not limited to:

- Registering for fewer credit hours each term;
 - Achieving a minimum GPA at the conclusion of the probationary period; this GPA might be a term-specific GPA that would at least indicate an upward movement from a very low cumulative GPA;
 - Achieving minimum grades (not just GPA, but course-specific grades); or
 - Enrolling in specific courses and demonstrate academic success in these courses.
- Consequences of Not Following the Plan
- Academic plans are designed to assess a student's progress at specified times. If a school determines that the student is not adhering to the academic plan, the student becomes immediately ineligible for Title IV aid. To regain eligibility, the student would need to submit another appeal and have it approved.
- Some possible reasons an academic plan could be voided by a school include:
 - The student has changed majors and the previous major that the academic plan was created for is no longer applicable.
 - Student doesn't follow the prescribed and agreed upon academic plan.
 - Student does not enroll for the payment period that the academic plan was designed to be applicable.



SLIDE 39

Academic Plans

- Under what circumstances does the school use academic plans for students who fail to maintain SAP?
- Who is responsible for developing academic plans for students?
- Who will monitor compliance and how often?

Academic Plans

When a school chooses to use an academic plan there are things that should be considered.

- Under what circumstances does the school use academic plans for students who fail to maintain SAP?
- Who is responsible for developing academic plans for students?
- Who will monitor compliance and how often?

Note to Instructor: Refer participants to the handout, Considerations for the Use of Academic Plans in Satisfactory Academic Progress Appeals, on pages 13 and 14 and Suggested Best Practices for SAP Appeals and Academic Plans on pages 15 and 16. You may choose to discuss the chart or point out that this is a reference tool that may be used after training.

SLIDE 40

Case Study 9: Oliver

Term	Earned Credits	Attempted Credits	Total Credits Earned	GPA	Pass
Fall 2016	8	15	8	1.60	
Spring 2017	4	12	4	.77	
Cumulative				1.23	44%

Academic Plan	Evaluation Frequency	Number of Credits to Qualitative Measure	Number of Credits to Quantitative Measure
		19	23

Case Study 9: Oliver

- Review Navigator Community College's SAP policy
- Compare Oliver's academic performance to his school's SAP standards
- Point out Oliver is no longer making SAP after Spring 2017
- Because SAP is assessed at the end of the spring semester, Navigator Community College cannot place Oliver on financial aid warning at the end of Fall 2016
- Review the requirements of Oliver's academic plan and the number of credits it will take him to achieve this:
 - Must complete all classes taken each term and maintain a term GPA of 2.4 or higher
- ➔ Refer participants to page 7 in the Participant Handout as you review Case Study 9: Oliver.

SLIDE 41

Consumer Information Requirements

VI. Consumer Information Requirements

SLIDE 42

Consumer Information Requirements

Prospective Students	Currently Enrolled Students
Readily available in paper or electronic format	Readily available in paper or electronic format
Accessible to the public	Easily accessible to students
Describe standards for maintaining and re-establishing Title IV aid eligibility	Describe standards for maintaining and re-establishing Title IV aid eligibility
Not via restricted intranet	If online, provide exact URL
	Annual notice of SAP policy
	SAP evaluation results, if eligibility is affected

Consumer Information Requirements

- A school must ensure its SAP policies for Title IV purposes are readily available to both prospective and enrolled students. SAP consumer information must include information on the:
 - Standards students must maintain to be considered to be making and maintaining SAP in a program of study for purposes of receiving Title IV aid; and



- Criteria by which a student who failed to make SAP may re-establish her eligibility.
- This information must include all of the school's SAP policy. If the SAP policy differs among academic programs or student categories, the different standards must be published in the school's consumer information. This information must be easily accessible.

Note to Instructor: This information can be found in 34 CFR 668.42(c)(1) and (2) of the consumer information section of the regulations, not in the SAP regulations in 668.34. 668.42(c)(1) and (2) requires schools inform students of their rights and responsibilities related to the receipt of Title IV aid and how Title IV aid may continue to be received.

- For prospective students:
 - SAP information must be reasonably available. Like other consumer information, a school can provide this information in a number of ways, such as paper copies and via public accessible website.
- For currently enrolled students:
 - Schools must distribute a notice on an annual basis which describes the consumer information it must make available to students and explains how the information may be obtained.
 - The information must be provided to these students through mailings or publications which may include direct mail via the U.S. Postal Service, campus mail, or email.
 - Schools may also provide a general statement to these students indicating where to find this and other consumer information items.

SLIDE 43



VII. Conclusion

Participants know their policies must include standards in relation to a quantitative measure (pace), maximum time frame, and a qualitative measure (which is typically GPA). Transfer credits must be evaluated and considered, and these standards must be provided to current and prospective students.

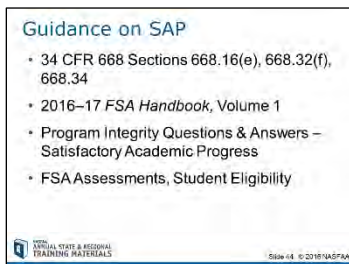
Other components of SAP are optional, but if the school exercises the option, the policy must clearly define the details. Appeals, a probationary period, repeats, change of major, academic plans and financial aid warnings must be explained to the student if used.

The slide lists ED resources available to participants.

- 34 CFR 668 Sections 668.16(e), 668.32(f), 668.34
- 2016–17 *FSA Handbook*, Volume 1
- Program Integrity Questions & Answers – Satisfactory Academic Progress
- FSA Assessments, Student Eligibility

These resources are included in the *Participant Handout* on page 21.

SLIDE 44





SLIDE 45



The slide lists resources available to NASFAA members online:

- NASFAA's *Policy and Procedures Template*
- NASFAA's *Self-Evaluation Guide* for Satisfactory Academic Progress
- *Satisfactory Academic Progress*, NASFAA Monograph 25, August 2012

These resources are included in the *Participant Handout* on page 21.

SLIDE 46



Wrap-up/End

Note to Instructor: Ask participants to take a few moments to complete the evaluation form included in the *Participant Handout*. Please collect the completed evaluation forms and mail them back to NASFAA at the address provided on the bottom of the form.

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