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Satisfactory Academic Progress: From Policy to Application

Participant Handout



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NATIONAL ASSOCIATION OF STUDENT FINANCIAL AID ADMINISTRATORS

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Satisfactory Academic Progress: From Policy to Application

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Workshop Goals

Participants will be able to:

- Understand the basic standards that a school must include in its satisfactory academic progress policy;
- Assess their existing institutional 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.



Compiled Title IV Regulations Related to Satisfactory Academic Progress

Subpart B—Standards for Participation in Title IV, HEA Programs Sec. 668.16 Standards of administrative capability.

To begin and to continue to participate in any Title IV, HEA program, an institution shall demonstrate to the Secretary that the institution is capable of adequately administering that program under each of the standards established in this section. The Secretary considers an institution to have that administrative capability if the institution—

(e) For purposes of determining student eligibility for assistance under a title IV, HEA program, establishes, publishes, and applies reasonable standards for measuring whether an otherwise eligible student is maintaining satisfactory progress in his or her educational program. The Secretary considers an institution's standards to be reasonable if the standards are in accordance with the provisions specified in Sec. 668.34.—

Subpart C—Student Eligibility Sec. 668.32 Student eligibility—general.

A student is eligible to receive Title IV, HEA program assistance if the student either meets all of the requirements in paragraphs (a) through (m) of this section or meets the requirement in paragraph (n) of this section as follows:

(f) Maintains satisfactory academic progress in his or her course of study according to the institution's published standards of satisfactory academic progress that satisfy the provisions of Sec. 668.16(e), and, if applicable, the provisions meet the requirements of Sec. 668.34.

Subpart C—Student Eligibility Sec. 668.34 Satisfactory academic progress.

(a) *Satisfactory academic progress policy.* An institution must establish a reasonable satisfactory academic progress policy for determining whether an otherwise eligible student is making satisfactory academic progress in his or her educational program and may receive assistance under the title IV, HEA programs. The Secretary considers the institution's policy to be reasonable if—

- (1) The policy is at least as strict as the policy the institution applies to a student who is not receiving assistance under the title IV, HEA programs;
- (2) The policy provides for consistent application of standards to all students within categories of students, e.g., full-time, part-time, undergraduate, and graduate students, and educational programs established by the institution;
- (3) The policy provides that a student's academic progress is evaluated—
 - (i) the end of each payment period if the educational program is either one academic year in length or shorter than an academic year; or
 - (ii) For all other educational programs, at the end of each payment period or at least annually to correspond with the end of a payment period;
- (4)(i) The policy specifies the grade point average (GPA) that a student must achieve at each evaluation, or if a GPA is not an appropriate qualitative measure, a comparable assessment measured against a norm; and (ii) If a student is enrolled in an educational program of more than two academic years, the policy

specifies that at the end of the second academic year, the student must have a GPA of at least a “C” or its equivalent, or have academic standing consistent with the institution’s requirements for graduation;

(5)(i) The policy specifies the pace at which a student must progress through his or her educational program to ensure that the student will complete the program within the maximum timeframe, as defined in paragraph (b) of this section, and provides for measurement of the student’s progress at each evaluation; and

(ii) An institution calculates the pace at which the student is progressing by dividing the cumulative number of hours the student has successfully completed by the cumulative number of hours the student has attempted. In making this calculation, the institution is not required to include remedial courses;

(6) The policy describes how a student’s GPA and pace of completion are affected by course incompletes, withdrawals, or repetitions, or transfers of credit from other institutions. Credit hours from another institution that are accepted toward the student’s educational program must count as both attempted and completed hours;

(7) Except as provided in paragraphs (c) and (d) of this section, the policy provides that, at the time of each evaluation, a student who has not achieved the required GPA, or who is not successfully completing his or her educational program at the required pace, is no longer eligible to receive assistance under the title IV, HEA programs;

(8) If the institution places students on financial aid warning, or on financial aid probation, as defined in paragraph (b) of this section, the policy describes these statuses and that—

(i) A student on financial aid warning may continue to receive assistance under the title IV, HEA programs for one payment period despite a determination that the student is not making satisfactory academic progress. Financial aid warning status may be assigned without an appeal or other action by the student; and

(ii) A student on financial aid probation may receive title IV, HEA program funds for one payment period. While a student is on financial aid probation, the institution may require the student to fulfill specific terms and conditions such as taking a reduced course load or enrolling in specific courses. At the end of one payment period on financial aid probation, the student must meet the institution’s satisfactory academic progress standards or meet the requirements of the academic plan developed by the institution and the student to qualify for further title IV, HEA program funds;

(9) If the institution permits a student to appeal a determination by the institution that he or she is not making satisfactory academic progress, the policy describes—

(i) How the student may reestablish his or her eligibility to receive assistance under the title IV, HEA programs;

(ii) The basis on which a student may file an appeal: The death of a relative, an injury or illness of the student, or other special circumstances; and

(iii) Information the student must submit regarding why the student failed to make satisfactory academic progress, and what has changed in the student’s situation that will allow the student to demonstrate satisfactory academic progress at the next evaluation;

(10) If the institution does not permit a student to appeal a determination by the institution that he or she is not making satisfactory academic progress, the policy must describe how the student may reestablish his or her eligibility to receive assistance under the title IV, HEA programs; and

(11) The policy provides for notification to students of the results of an evaluation that impacts the student’s eligibility for title IV, HEA program funds.



Satisfactory Academic Progress Case Studies

Case Study 1: Liam

To be eligible for financial assistance at Riverbank University, a student must meet minimum satisfactory academic progress (SAP) standards for each semester – fall, spring and summer. Riverbank calculates its grade point average (GPA) using a four-point scale. Satisfactory academic progress is defined as passing 67 percent of the hours attempted and achieving a 2.0 overall cumulative GPA during each semester while pursuing a degree program. Students pursuing a bachelor's degree are required to complete their degree plan within 180 hours attempted.

During his first semester, Liam enrolled in and successfully completed five 3-credit courses for a total of 15 credits. In which he earned two "A", two "B", and one C grades.

Liam's current GPA of 3.4 is well above Riverbank University's minimum qualitative standard.

Case Study 2: Olivia

Cedar Cove Community College is located in a large metropolitan city. It is an open-access institution and enrolls a high number of adult students. Due to the composition of its student body, Cedar Cove Community College evaluates SAP after each payment period and uses a graduated GPA (on a four-point scale) for its qualitative component. The minimum GPA a student must possess depends on the number of terms completed as follows: Term 1 – 1.5 GPA; Term 2 – 1.8 GPA; Term 3 and all subsequent terms – 2.0 GPA.

Olivia enrolls at Cedar Cove Community College after her full-time position was eliminated at company she worked for 10 years. She is pursuing an associate degree in business administration.

During her first term, she completed four 3-credit courses. Olivia didn't do as well as she had hoped to do academically and earned two "C" and two "D" grades. She was able to meet the graduated GPA standard. For her second term, she completed three 3-credit courses and earned a "B" and two "C" grades. Her GPA improved, and she slightly exceeded Cedar Cove Community College's minimum standard for students enrolled for two terms. During the third term, Olivia completed two classes, earning grades of "A" and "B." As a result, her cumulative GPA is 2.22 and she currently exceeds the school's qualitative standard for students enrolled for three or more terms.

Case Study 3: Addison

Addison is a student at Achievement University (AU). She is pursuing a bachelor's degree in Biology. Because she is enrolled in a program of study longer than two academic years, Addison is subject to the requirement to have a GPA equivalent to a "C" or better at the end of her second year.

AU uses a four-point scale to calculate GPAs. Under its SAP policy, students are expected to meet a fixed qualitative standard of a 2.0 GPA at each annual evaluation.

Addison did well during her first term at AU. She completed 12 credits, earning an "A," two "B" grades, and a "C." Feeling acclimated to the college environment; she attempted 15 credits during the next semester. While she completed all 15 credits, Addison's academic performance was not as good as her first semester. She earned a "B," three "C" grades, and a "D". Realizing she might have been a bit ambitious during the previous

semester, Addison takes three 3-credit nine credits (three classes) during the next semester and earned a “D” in each class. For her fourth semester, Addison again attempted three classes for a total of nine credits. She earned two “D” grades and a “C.” At the end of her second year, Addison’s GPA is 1.93. She is not meeting SAP standards.

Case Study 4: Jaxon

Innovative Institute offers arts programs. Believing GPAs stifle creativity and do not adequately reflect student accomplishment, it does not use grade point averages to measure academic achievement.

Instead, it awards a badge for each program-related topic a student masters during a payment period. Innovative Institute has established to measure student achievement. Students are expected to attempt 12 topics per payment period. The number of badges earned equates to a level of academic achievement as shown in the table below:

Number of Badges Earned	Academic Achievement Level
12	Outstanding
10 - 11	Good
8 - 9	Acceptable
6 - 7	Poor
5 or Fewer	Unacceptable

On a cumulative basis, Innovative Institute expects students to earn at least 75 percent of the badges they attempt.

Jaxon is enrolled in a two-year communication program at Innovative Institute. During the first payment period, he earned 11 badges. For his second payment period, he earned 10 badges. During the third payment period, he earned 8 badges. For his fourth payment period he earned 12 badges.

Overall, Jaxon has done well in his program so far. For the first two payment periods, his academic achievement level was “Good.” He had some trouble during the third payment period, but his academic performance improved during the fourth payment period, when his academic achievement level was “Outstanding.” During his enrollment, Jaxon has also maintained a cumulative achievement level of at least 75 percent. After the fourth payment period, his overall achievement level is 85.4 percent.

Although Jaxon has completed four payment periods (or two years) of study, he has not yet finished his program in communication. He needs to earn another seven badges (for a total of 48) to graduate.

Case Study 5: Skylar

Amber Hills University offers a bachelor’s degree in Environmental Science that is a 120 credit hour program. The maximum time frame is 180 credits for this program.

In order to determine the pace that is required to complete the program on time, it divided 120 by 180, which equals a pace of 67%. If a student earns 67% of the credits attempted in each term, the student should complete the program within the maximum time frame. This is applicable at any enrollment status, as it is designed to measure completion appropriately for each student, regardless of enrollment status.

Amber Hills University defines an award year as fall and spring terms. Summer is considered an optional term. It measures SAP annually at the conclusion of spring term.

Skylar has completed her second year at Amber Hills University. During her first year of studies she enrolled in 12 credits and successfully completed 9 credits in the fall and spring terms. In order to complete her program on time, she chose to enroll in courses during the optional summer term. She enrolled in and successfully completes 6 credits. During next fall and spring terms, she enrolled in 12 credits each term. She successfully completes 9 credits for fall term and 12 credits for the spring term.

Case Study 6: Grayson

Blue Lake Community College is an open-enrollment institution that enrolls a large number of nontraditional students. The school evaluates SAP at the end of each payment period. Students, who are not in compliance with SAP standards, are placed on financial aid warning for one payment period. While on financial aid warning, students are required to meet with an academic counselor to provide guidance that should allow them to meet SAP standards at the end of that payment period.

Blue Lake Community College uses a graduated standard to calculate pace, as follows:

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

Grayson is attending Blue Lake Community College to pursue an associate's degree in Engineering Technology. He plans to transfer to a larger institution after he completes his degree so he can pursue a bachelor's degree in Engineering Cybernetics. Grayson has just completed his third term at Blue Lake Community College.

During his first and second terms, he enrolled in 15 credit hours and successfully completed 9 credits in the fall and 11 credits in the spring. He decided to enroll in the summer term. He takes 9 credits and successfully completes 6 credits.

Under Blue Lake Community College's graduated standard, Grayson is maintaining pace based on his cumulative record at the end of the second term. After the Grayson's first term, his pace is 60 percent, which meets the school's minimum standard. After his second term, Grayson's pace also meets the graduated standard of 65 percent. However, after completing his third term, Grayson is no longer meeting the pace requirement to maintain SAP. His pace is 67 percent, below the required pace of 70 percent.

Case Study 7: Wyatt

Wyatt began his undergraduate studies at Obsidian Junior College, where he earned an associate degree in language arts. To earn his bachelor's degree, Wyatt enrolls at North Point University, where he is pursuing a physical therapist bachelor's degree. Wyatt changed academic programs, and North Point University only accepts 30 of the 60 credits Wyatt earned at Obsidian Junior College.

North Point University evaluates SAP annually at the end of the spring semester and requires students to maintain a pace of 65 percent.

During his first semester, Wyatt enrolled in 12 credit hours and was only able to successfully complete half of these hours. Hoping to make up these hours, Wyatt enrolled in 18 credit hours during the spring semester. He was able to successfully complete 12 credits.

Even though Wyatt didn't complete the number of classes he wanted to during his first two semesters at North Point, his pace is calculated to be 80 percent, meeting the school's minimum SAP standard. Since the 30 of the 60 credits taken at Obsidian Junior College was accepted, they count as both attempted and earned credits for Wyatt. This has enabled him to meet the quantitative component of the North Point University's SAP standards.

However, if North Point University had to calculate Wyatt's pace using only his coursework at North Point, his pace would be 60 percent (18 credits completed/30 credits attempted). If this were the case, Wyatt would not be meeting the minimums SAP standards because his pace would be below the minimum of 65 percent set by his current school.

Case Study 8: Penelope

Empire Edge Institute offers a 1,600 clock-hour cosmetology program and students are expected to complete the program in 11.5 months (46 weeks). An academic year is defined as 900 clock hours completed over 32 weeks.

Penelope is enrolled in at Empire Edge Institute. Each payment period is the amount of time it takes a student to complete both 450 clock hours and 16 weeks of instruction. Empire Edge has chosen to evaluate SAP at the point the students' scheduled clock hours for a payment period have elapsed. To maintain progress, students must have a pace of at least 67 percent.

Empire Edge evaluates Penelope's progress 16 weeks after she begins her enrollment. This is the point when she should have completed the clock hours scheduled for the payment period. At this point, she has completed 325 clock hours.

Penelope's pace of 72 percent exceeds Empire Edge's minimum quantitative standard of 67 percent. Note, however, that Penelope has not yet completed the first payment period. She must complete the remaining 100 clock hours in the period before beginning the second payment period (and receiving additional Title IV aid).

Case Study 9: Oliver

Navigator Community College's (NCC) SAP policy uses fixed standards to evaluate students on an annual basis. In order to meet the minimum requirements for SAP, students must maintain a cumulative GPA of 2.0 and pass 70% of the courses attempted. Students who do not meet either or both of the minimum requirements may appeal under certain circumstances and conditions. These students are also required to meet with an academic advisor to determine what classes should be taken for the next three terms and what the student will do to increase his chances of success.

Oliver has completed his first year at NCC. He enrolled in 15 hours for fall term. He successfully completed 12 hours and earned a 1.6 GPA. He enrolled in 12 hours for spring term. During this term, he was very ill and did not perform well in all of his midterm exams. Later, his doctor diagnosed him with pneumonia. Instead of withdrawing, he continued his studies hoping that he would be able to pass his finals successfully. However, this was not the case. He successfully completed 4 hours and earned a .77 GPA. His cumulative GPA was now 1.23.

NCC evaluated SAP and determined that Oliver was not meeting the minimum standards for both the qualitative and quantitative aspects of SAP. He was immediately deemed ineligible for additional Title IV aid.

Oliver appeals and submits a personal statement and documentation of illness to show why he was unable to meet SAP standards. After reviewing Oliver's appeal, the NCC Appeals Committee determines that Oliver will not be able to make SAP within one term. The Appeals Committee calculates that it will take him 23 credit hours to reach 67% and 19 credit hours at a term GPA of 2.4 to reach a 2.00 cumulative GPA. The Appeals Committee approves Oliver's appeal and places him on financial aid probation using an academic plan with the following requirements:

- Must complete all classes taken each term and maintain a term GPA of 2.4 or higher;
- Will be on financial aid probation until he reaches minimum requirements; and
- Aid will be terminated if he doesn't complete the requirements of the academic plan.

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Considerations for Frequency of SAP Evaluations

The chart below details issues to consider when determining the frequency at which an institution will evaluate satisfactory academic progress (SAP).

Issue	Considerations
Academic calendar	<ul style="list-style-type: none"> • Is the academic calendar traditional or more flexible (e.g., modules, cohorts, nonterm)? • Is there a summer session(s)? • Is there an intersession(s)? • Does the institution enter into written agreements? <ul style="list-style-type: none"> ➤ Which institution monitors SAP? • Do any courses begin or end outside of established payment period dates?
Appeals process	<ul style="list-style-type: none"> • Are SAP appeals allowed? • Who reviews appeals? • How long does it take to process appeals? • Are academic plans used? <ul style="list-style-type: none"> ➤ How are plans monitored?
Campus involvement and cooperation	<ul style="list-style-type: none"> • Does the campus see SAP as an institution-wide issue? • Are members of the campus community involved in reviewing appeals? • Are academic departments involved in the development and monitoring of academic plans? • Are members of the campus community involved in the review and updating of SAP policies and procedures?
Financial aid management system	<ul style="list-style-type: none"> • Can all or part of the SAP evaluation process be automated?
Resources	<ul style="list-style-type: none"> • Is Information Technology (IT) support available to automate the SAP evaluation process and/or to develop reports? • What resources are available for communicating with and counseling students?
Staffing	<ul style="list-style-type: none"> • How many staff are available to assist with the evaluation process? • How many staff are available to assist with the appeal process? • What training does staff need on the evaluation process? • What training does staff need on the appeal process?
Student body characteristics	<ul style="list-style-type: none"> • What percentage of students typically fail to meet SAP standards? • What percentage of students enroll in optional terms such as summer?

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Elements of Satisfactory Academic Progress Appeals Policies and Procedures

The following table describes various elements of satisfactory academic progress (SAP) appeal policies and procedures, which are part of an institution's SAP policies and procedures. It may be used in conjunction with NASFAA's *Policies and Procedures Tools*, available online at www.nasfaa.org.

SAP Appeal Circumstances	
Policies	Procedures
<ul style="list-style-type: none"> • Provide general descriptions of circumstances that warrant consideration of a SAP appeal, as well those that are not acceptable. • State which elements of the SAP policy are appealable (e.g. pace, maximum time frame) and not appealable. • Indicate that a SAP appeal is required to be placed on financial aid probation. • Indicate that a student may be placed on financial aid probation for only one payment period, at the end of which the student is expected to meet SAP standards. 	<ul style="list-style-type: none"> • Describe the general process for reviewing the reasons for a SAP appeal request, including financial aid probation considerations. • Describe the process for considering any exceptions to the policies.
SAP Appeal Process	
Policies	Procedures
<ul style="list-style-type: none"> • Provide a description of how a student makes a request (e.g., in writing). • Must the student sign the appeal request? • Include information on how the institution utilizes technology in the process (e.g., use of an online request form). • Is there a deadline by which students must submit appeals? • Which staff is responsible for reviewing appeals? • Describe any limits on the number of appeals a student may submit. • Note the institution's policy on appealing a denied SAP appeal. 	<ul style="list-style-type: none"> • Does your institution have a request form students must complete? • How are requests routed to the appropriate staff? • How does your office handle incomplete appeal requests? • How does a student appeal a decision? Which staff reviews such appeals?
SAP Appeal Documentation	
Policies	Procedures
<ul style="list-style-type: none"> • Provide examples of acceptable documentation. • Detail any documentation requirements for students' ability to meet SAP standards after the subsequent payment period. • Include consequences of failing to submit requested documentation. • Include any deadlines for submitting documentation. 	<ul style="list-style-type: none"> • How does the financial aid office notify students of documentation requirements? • What actions does the institution take when students submit documentation late?

Academic Plans	
Policies	Procedures
<ul style="list-style-type: none"> • Provide a general description of the situations for which you will utilize academic plans, as well as situations for which plans will not be used. • Describe how academic plans will or will not be used for various categories of students. • State whether or not the use of academic plans will be limited based on elements of the SAP policy. • Discuss your policies for the development of academic plans. • Describe your policies for monitoring student compliance. • Describe the contact students on academic plans must have, if any, with campus offices and academic advisors/counselors. 	<ul style="list-style-type: none"> • How will academic plans be developed? • Which staff is responsible for developing academic plans and monitoring compliance? • How will students be notified regarding their academic plans and the requirements of the plans? • How will students be notified regarding their compliance with academic plans? • How will the use of academic plans fit into the SAP evaluation process?
Communication with Students	
Policies	Procedures
<ul style="list-style-type: none"> • Address whether the student must have contact with the financial aid office before submitting an appeal. • Discuss what contact, if any, the financial aid office will have with the student during the appeal process. 	<ul style="list-style-type: none"> • What type of contact does the student need to have with the financial aid office? Is an appointment with a counselor required? • If the financial aid office will be in contact with the student during the process, how frequent is the contact? Is it at predetermined points?
Consumer Information	
Policies	Procedures
<ul style="list-style-type: none"> • Describe the information you publish regarding SAP appeals. • Discuss how revisions to appeal policies impact previously released information. 	<ul style="list-style-type: none"> • How is information about SAP appeals disseminated? • How are changes to policies publicized?



Considerations for the Use of Academic Plans in SAP Appeals

Use this worksheet to help determine if your institution can effectively implement the use of academic plans in your satisfactory academic progress (SAP) appeal policy. Keep in mind that SAP is an institutional requirement under 34 CFR 668.16(e) of the General Provisions regulations, so you will need to involve all applicable campus offices in the decision-making process. A majority of “Yes” responses indicates you should be able to effectively implement the use of academic plans. “No” responses indicate areas where changes, additional resources, and/or more research is needed prior to implementation.

1. Buy-in from other institutional offices

Effective implementation of academic plans requires the buy-in and continued involvement of other campus offices such as academic advisors, counseling or resource centers, and the registrar. Staff in these offices can assist the financial aid office in developing individualized academic plans to help get students back on track to meet SAP requirements.

- a. Are staff from the appropriate offices willing to be involved in the development of academic plans? Yes No
- b. Are staff from other offices willing to assist in counseling students regarding academic plans? Yes No
- c. Are staff from other offices familiar with the institution’s SAP policies? Yes No

Comments:

2. Available resources

Use of academic plans also requires adequate resources. Proper development will require substantial staff time, additional training of staff, more time for student counseling, and the development of specialized correspondence.

- a. Can the institution devote the necessary staff time to the use of academic plans? Yes No
- b. Can the institution adequately train involved staff in the effective use of academic plans? Yes No
- c. Is the institution willing to develop customized correspondence for students who will utilize academic plans? Yes No

Comments:

3. System of monitoring compliance

A necessary component of the use of academic plans is an adequate system to monitor student compliance. A monitoring system will require additional staff effort, including nonfinancial aid office staff, and possibly system adjustments if your evaluation process is automated.

- a. Does the institution have the staff capacity (from all involved offices) to effectively monitor compliance with academic plans? Yes No
- b. Can the institution monitor compliance in an efficient manner? Yes No
- c. If SAP evaluation and tracking is automated, can the system be modified to monitor compliance with academic plans? Yes No
- d. Do all institutional staff members who play a role in monitoring a student's SAP have access to all of the information needed to do so, and with sufficient levels of information security (e.g., financial aid office staff, registrar's office staff, academic advisors/counselors)? Yes No

Comments:

4. Nature and needs of student body

Academic plans are tool to assist students in meeting your SAP standards. An institution should use this option if it believes students will benefit from this form of intervention.

- a. Would certain categories of students (e.g., underclassmen) benefit from the use of academic plans? Yes No
- b. Historically, do students have difficulty meeting SAP standards? Yes No
- c. Do students respond well to similar types of intervention utilized by the school? Yes No

Comments:



Suggested Best Practices for SAP Appeals and Academic Plans

The following are suggested best practices for schools that choose to utilize a satisfactory academic progress (SAP) appeals process and/or academic plans for students who fail to meet the school's SAP standards.

- Inform academic departments and administrative offices about the school's SAP policy and how a student's failure to meet SAP standards affects the student's ability to receive Title IV aid
 - Notify academic departments and administrative offices of any changes in SAP policy and annually review SAP standards
 - Establish partnerships with academic departments and administrative offices to encourage their involvement in identifying and assisting students who are struggling academically
- Use an early alert referral system to catch students early on who are struggling academically and/or not attending class and/or review midterm grades to identify students who are in danger of not meeting SAP standards at the next SAP evaluation
 - If a student is struggling academically, contact the student and advise him or her of available academic advising and/or tutoring resources

SAP Appeals

- Where possible, automate the process for notifying a student who is not making SAP, providing information about the SAP appeals process, submitting an appeal and required documentation, and notifying the student of the result of his or her appeal
 - Use templates for email notifications and/or the school's portal for communicating with students
- Make sure information about the school's SAP appeal process clearly explains:
 - Why the student is not making SAP
 - How the student may appeal the determination, including what information is needed and by when
 - Who to contact if the student has any questions
 - When the student may expect a decision
 - How the student may re-establish his or her Title IV eligibility should the appeal be denied
- Use a tracking system that identifies:
 - When a student has failed to meet SAP standards
 - When the student is notified of the failure to meet SAP standards
 - Whether the student has submitted an appeal
 - Documents needed to complete an appeal and when they are received
 - When the student is notified of the results of the appeal
- Periodically check for consistency in appeal decisions
 - If possible, use the same staff member(s) to review and act on SAP appeals
 - If different staff member(s) are used to review and act on SAP appeals, ensure staff have a thorough understanding of the school's SAP standards

SAP Academic Plans

- Where possible, automate the process for developing academic plans
- Develop templates to address different problems in meeting specific SAP standards and use them to start building academic plans
- Involve academic advisors and/or faculty, who are knowledgeable of the school's SAP standards, in the development of academic plans
- Once the student is placed on an academic plan, make sure the student clearly understands:
 - How long the student will remain on the plan
 - Any restrictions placed on him or her while under the plan (e.g., a limitation on course load and/or employment)
 - The specific academic outcome expected for each period of enrollment under the plan
 - Any available resources to assist him or her academically
 - Who to contact if any questions about or problems with the plan
 - The consequences for failing to follow the plan and re-establish his or her Title IV eligibility
- Use a tracking system to monitor the student's compliance with the plan
- Periodically check for consistency in academic plans
 - If possible, use the same staff member(s) to develop academic plans
 - If different staff member(s) are used to develop academic plans, ensure staff have a thorough understanding of the school's SAP standards
- Periodically review how effective academic plans are in assisting students re-establish their Title IV eligibility and, if needed, revise the school's process for developing academic plans



Glossary of Terms Related to Satisfactory Academic Progress

Academic amnesty: A process offered by some institutions which allows students to have credits attempted and grades earned in previous terms excluded from the calculation of the student's grade point average (GPA). No provisions for academic amnesty are made in FSA regulations.

Academic Plan: A plan developed by the institution and the student to ensure that the student is able to meet the institution's satisfactory academic progress standards by a specific point in time.

Academic year (AY): The program's AY, which must be defined according to statute as:

- For undergraduate credit-hour programs, a minimum of 30 weeks during which a full-time student is expected to complete at least 24 semester or trimester hours or 36 quarter hours;
- For undergraduate clock-hour programs, a minimum of 26 weeks during which a full-time student is expected to complete at least 900 clock hours;
- For graduate and professional credit-hour programs, a minimum of 30 weeks during which a full-time student is expected to complete the minimum number of credit hours defined by the school; and
- For graduate and professional clock-hour programs, a minimum of 26 weeks during which a full-time student is expected to complete the minimum number of clock hours defined by the school.

Appeal: A process by which a student who is not meeting the institution's satisfactory academic progress standards petitions the institution for reconsideration of the student's eligibility for title IV, HEA program assistance.

Financial aid probation: A status assigned by an institution to a student who fails to make satisfactory academic progress and who has appealed and has had eligibility for aid reinstated.

Financial aid warning: A status assigned to a student who fails to make satisfactory academic progress at an institution that evaluates academic progress at the end of each payment period.

Full-time student: An enrolled student who is carrying a full-time academic workload, as determined by the institution, under a standard applicable to all students enrolled in a particular educational program. The student's workload may include any combination of courses, work, research, or special studies that the institution considers sufficient to classify the student as a full-time student including for a term-based program, repeating any coursework previously taken in the program but not including either more than one repetition of a previously passed course, or any repetition of a previously passed course due to the student failing other coursework. However, for an undergraduate student, full-time status must be at least:

- 12 semester hours or 12 quarter hours per academic term in an educational program using a semester, trimester, or quarter system;
- 24 semester hours or 36 quarter hours per academic year for an educational program using credit hours but not using a semester, trimester, or quarter system, or the prorated equivalent for a program of less than one academic year;
- 24 clock hours per week for an educational program using clock hours;
- A series of courses or seminars equaling 12 semester or quarter hours over a maximum of 18 weeks;
- For a program that measures credit hours and uses nonstandard terms, the number of weeks of instruction in the term divided by the number of weeks of instruction in the academic year, multiplied by the number of credit hours in the academic year

- The work portion of a cooperative education program in which the amount of work performed is equivalent to the academic workload of a full-time student; or
- For correspondence work, a course load commensurate with the definitions listed here, and at least half of that load must be non-correspondence coursework that meets half of the school's requirement for full-time students.

Grade point average (GPA): A measure of a student's academic achievement at an institution, calculated by dividing the total number of grade points earned by the total number of credits or hours earned.

Graduated: Divided into or marked with intervals with increasing difficulty.

Graduate or professional student: A student who—

- Is not receiving title IV aid as an undergraduate student for the same period of enrollment;
- Is enrolled in a program or course above the baccalaureate level or is enrolled in a program leading to a professional degree; and
- Has completed the equivalent of at least three years of full-time study either prior to entrance into the program or as part of the program itself.

Half-time enrollment: Half of the minimum full-time standard established in the regulations even if this is less than half the full-time standard established by the school.

Higher Education Act of 1965, as amended (HEA): The authorizing legislation for most of the federal student financial assistance programs. Established in 1965 by Congress, Title IV of the HEA authorizes the following programs: Federal Pell Grant, Iraq and Afghanistan Service Grant (IASG), Teacher Education Assistance for College and Higher Education (TEACH) Grant, Federal Supplemental Educational Opportunity Grant (FSEOG), Federal Work-Study (FWS), Federal Perkins Loan, and Federal Direct Student Loan (Direct Loan). Collectively, these programs are known as the Title IV programs and are administered by the U.S. Department of Education (ED).

Maximum timeframe: Refers to—

- For an undergraduate program measured in credit hours, a period that is no longer than 150 percent of the published length of the educational program, as measured in credit hours;
- For an undergraduate program measured in clock hours, a period that is no longer than 150 percent of the published length of the educational program, as measured by the cumulative number of clock hours the student is required to complete and expressed in calendar time; and
- For a graduate program, a period defined by the institution that is based on the length of the educational program.

Pace: A measure of a student's progress toward completion of his or her program of study which compares hours earned to hours attempted, expressed as a fraction.

Payment period: A school-defined length of time for which financial aid funds are paid to a student. For programs using academic terms (semester, trimester, or quarter), a payment period is equal to a term. For programs not using academic terms, schools must designate at least two payment periods within an academic year that meets all applicable regulations.

Period of enrollment: Except for nonterm programs, the period of time coinciding with an academic term established by the school for which institutional charges are generally assessed (e.g., semester, trimester, quarter, length of the student's program or academic year).

Professional judgment (PJ): The authority for financial aid administrators to exercise discretion in a number of areas, such as dependency status, need analysis, cost of attendance, and denial or reduction of Federal Direct Student Loan eligibility, when a student has special or unusual circumstances. Decisions are made and documented on a case-by-case basis.

Remedial coursework: A course of study designed to increase the ability of a student to pursue a course of study leading to a certificate or degree.

- A noncredit remedial course is one for which no credit is given toward a certificate or degree; and
- A reduced credit remedial course is one for which reduced credit is given toward a certificate or degree.

Repeated coursework: Any coursework which a student has completed and is enrolling in again either due to, program requirements, or to obtain a better grade.

Qualitative component: The specified standard, typically the grade point average GPA or other standard measured against a norm, that a student must have at each evaluation.

Quantitative component: The pace at which students must progress through their program to ensure that they will graduate within the maximum timeframe.

Regular student: A regular student is someone who is enrolled or accepted for enrollment in an eligible institution for the purpose of obtaining a degree, certificate, or other recognized credential offered by the school.

Remedial coursework: A course of study designed to increase the ability of a student to pursue a course of study leading to a certificate or degree.

- A noncredit remedial course is one for which no credit is given toward a certificate or degree; and
- A reduced credit remedial course is one for which reduced credit is given toward a certificate or degree.

Satisfactory academic progress (SAP): The progress required of a financial aid recipient in acceptable studies or other activities to fulfill a specified educational objective. SAP contains both a grade, or its equivalent (qualitative), and pace (quantitative) measure. It also must be the same as or stricter than academic standards used for students not receiving Title IV aid.

Satisfactory academic progress (SAP) appeal: A process by which a student who is not meeting the institution's SAP standards petitions the institution for reconsideration of the student's eligibility for Title IV, Higher Education Act program assistance.

Satisfactory academic progress (SAP) policy: The progress required of a financial aid recipient in acceptable studies or other activities to fulfill a specified educational objective. SAP contains either a grade, or its equivalent (qualitative), and pace (quantitative) measure. It also must be the same as or stricter than academic standards used for students not receiving Title IV aid.

Student eligibility: Students must meet certain criteria to be eligible to receive Title IV financial aid. Eligibility is determined by self-certified information as well as information submitted to ED on the FAFSA, and data provided directly to higher education institutions.

Transfer credit: Credit or clock hours from another institution that are accepted toward the student's educational program at the student's current institution which must count as both attempted and completed hours.

Undergraduate student: A degree-seeking student at a college or university who has not earned a first bachelor's degree.

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Resources for Satisfactory Academic Progress: From Policy to Application

The following is a list of resources used to develop the training materials you may find helpful.

Regulations

34 CFR 668 Sections 668.16(e), 668.32(f), 668.34

Federal Registers

- *Federal Register*, 10/29/10, pp. 66879 to 66887 – Program Integrity Issues; Final Rule

Electronic Announcements

- *Electronic Announcement*, 9/2/11 – Program Integrity Information - Questions and Answers
- *Electronic Announcement*, 6/6/11 – Satisfactory Academic Progress Reviews for Students in Clock Hour Programs

Other Resources

- 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

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NASFAA's Annual Training Satisfactory Academic Progress: From Policy to Application





Training Goals

- Review the satisfactory academic progress (SAP) regulatory requirements
- Examine optional SAP policy components
- Provide best practices for using a SAP appeal process and the use of academic plans
- Review SAP Consumer Information requirements

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Regulatory Requirements

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What is Satisfactory Academic Progress?

- It is an aspect of the general student eligibility requirements found in 34 CFR 668 Subpart C
- Schools must establish a SAP policy to measure a student's progress in his or her educational program
- Schools have some options in determining its SAP policy

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SAP Policy Standards

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SAP Policy Standards

Standards Evaluation Monitoring

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SAP Policy Standards

Standards

- Must be reasonable
 - As strict or stricter
- Consistently applied
 - Enrollment level
 - Classification
 - Program of study
- Applicable to all Title IV programs

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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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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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Evaluating SAP



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SAP Policy – Evaluation



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



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Evaluating SAP

Frequency + Timing = Evaluation

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SAP – Evaluation Measurements

Evaluation ← Qualitative
Evaluation ← Quantitative

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Qualitative Measure – GPA

- Defined as a cumulative measurement of a student's academic work
 - Grade Point Average
 - Comparable Qualitative Measure
 - Graduated Standard
- Must be cumulative
- Equivalent of a "C" or better

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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 2: Olivia

Policy

Term	Minimum GPA
1	1.5
2	1.8
3 and subsequent	2.0

Graduated Standard

Olivia

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



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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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Quantitative Component – Maximum Timeframe



Amount of time allowed to complete an educational program

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

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

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

$$\frac{45 \text{ Hours Earned}}{54 \text{ Hours Attempted}} = 83\%$$



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Case Study 6: Grayson

Policy

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

Graduated Standard

Grayson

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

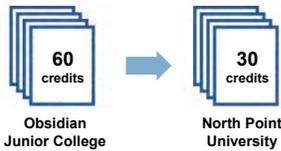


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Case Study 7: Wyatt

Term	Earned Credits	Attempted Credits	Pace	Total Credits Earned
Fall 2016	6	12		36
Spring 2017	12	18	80%	48

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



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Case Study 8: Penelope

Completed Clock Hours	Scheduled Clock Hours	Pace
325	450	72%

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

- Program length:
 - 900 clock hours
 - 32 weeks
- Pace expectation is 67%
- Review after first payment period:
 - Completion of 450 clock hours and 16 weeks



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NASFAA's Annual Training Satisfactory Academic Progress: From Policy to Application

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

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

School
must
determine
SAP
treatment

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



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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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Re-Establishing Eligibility



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



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Monitoring SAP



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SAP Policy - Monitoring

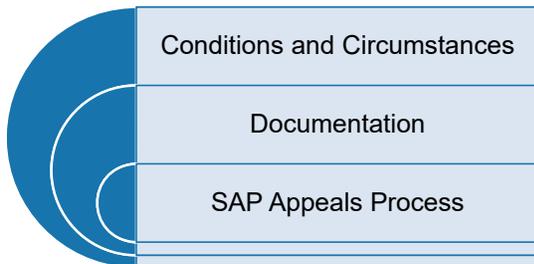


- Financial aid warning
- Financial aid probation
- SAP Appeals

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

SAP Appeals





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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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Academic Plans

Frequency of Monitoring

Development of Academic Plans

Consequences of Not Following the Plan



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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?



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Case Study 9: Oliver

Oliver					
Term	Earned Credits	Attempted Credits	Total Credits Earned	GPA	Pace
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 Minimum	Number of Credits to Quantitative Minimum
Payment Period	19	23



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Consumer Information Requirements



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Consumer Information Requirements

Prospective Students	Currently Enrolled Students
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	
Not via restricted intranet	If online, provide exact URL
	Annual notice of SAP policy
	SAP evaluation results, if eligibility is affected



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Conclusion

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Guidance on SAP

- 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

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Guidance on SAP

- NASFAA's *Policies & Procedures Tool – Satisfactory Academic Progress*
- NASFAA's *Self-Evaluation Guide – Satisfactory Academic Progress*
- *Satisfactory Academic Progress*, NASFAA Monograph 25, August 2012

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NASFAA's Annual Training Satisfactory Academic Progress: From Policy to Application





Satisfactory Academic Progress: From Policy to Application

NASFAA 2016–17 Annual State and Regional Training Material Evaluation

NASFAA appreciates your interest in its training activities. To help ensure that our efforts meet your needs, please complete the following questions and leave this form with your instructor.

Location of this training: _____ Date: _____

In responding to the questions that ask for a rating, please use the following scale:

5 = Excellent 4 = Very Good 3 = Good 2 = Fair 1 = Poor

I. Please indicate the usefulness of information for your position/job.

Content of Training	5	4	3	2	1
Instructor's Presentation	5	4	3	2	1
Examples	5	4	3	2	1
Group Discussions	5	4	3	2	1
Handouts	5	4	3	2	1
Overall Training	5	4	3	2	1

II. What features of the training and/or the materials did you find most useful? Select all that apply.

- Instructor's presentation Examples
 Group Discussions Handouts

Other, please specify. _____

III. What features would have made the training and the materials more useful?

- Instructor's presentation Examples
 Group Discussion Handouts

Other, please specify. _____

IV. Please indicate the type of setting this training was conducted. (Check *all* that apply)

- Stand Alone Topic General Session Breakout Session
 Other, please specify: _____

V. If you feel that additional materials would have been helpful in the context of the training, please describe them.

VI. Would you recommend this training to a colleague? Yes No

If no, why not? _____

VII. Please check the type of institution you represent. (Check *all* that apply)

- Public Proprietary Two-year
 Private Graduate/Professional Four-year
 Other: _____

VIII. How many years of experience do you have as a financial aid administrator? (Check one)

- Less than 2 years
 2 to 5 years
 More than 5 years
 More than 10 years
 More than 15 years

IX. Have you previously attended any other NASFAA training? Yes No

X. If you have ideas about other topics that should be the subject of future training, please list them.

XI. Please use the space below for any other comments you would like to make.

If you are unable to leave this form with an instructor, please complete it and mail or fax to:

Dana Kelly
National Association of Student Financial Aid Administrators
1101 Connecticut Avenue N.W., Suite 1100
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Fax: 202/785-1487



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