

Satisfactory Academic Progress (SAP)

Time Estimate:

Lecture 20 minutes

Total Time: 20 minutes

By the end of this session, you will be able to:

- *determine if a student is making satisfactory academic progress.*

INTRODUCTION

According to federal regulations, all schools participating in Title IV programs must establish satisfactory academic progress (SAP) standards.

✓ 34 CFR 668.16(e)

- An SAP policy helps ensure that students are moving toward successfully completing the program of study for which they are receiving aid.

During this session, we'll discuss federal regulations governing SAP and what's needed to develop an SAP policy.

Please turn to page 2 of your Workbook [IG, pg. 12], which contains the actual federal regulations governing SAP.

PW 2

First, I want to emphasize how important it is for a school using federal aid funds to have a satisfactory academic progress policy. Because it's federal law, the government can and will assess liabilities if your school doesn't adequately monitor or apply SAP standards.

Please take a few minutes to read these regulations.

- » Allow participants 5 minutes to read the regulations. This might be the first, and only time that the CEO/Presidents will be reading financial aid regulations. Consider pointing out that these regulations are based on statute and have the weight of law. Further, the SAP regulations represent only a fraction of the hundreds of pages of federal financial aid regulations.

What questions do you have about what you just read?

Instructor's Notes

As you have read, SAP is a student-eligibility requirement and schools are responsible for making sure that students who are not making SAP do not receive student financial aid funds.

Regulations say that schools must establish and publish SAP policies that apply reasonable standards for measuring whether a student is maintaining SAP. There are three features that schools must incorporate into the standards. (OH 1)

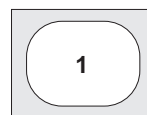
- The standards must have a quantitative component and a qualitative component.
- The standards must be as strict or stricter than the school's standards for students not on financial aid.
- The standards must be applied consistently within categories of students.

Remember that schools also have other responsibilities under SAP regulations. For example, schools must:

- determine students' SAP at the end of specific increments, but not less frequently than at the end of each academic year (or by the midpoint of a program that is equal to or less than an academic year);
- include specific policies defining the effect on SAP of course incompletes, withdrawals, repetitions, and noncredit remedial courses;
- have procedures for students to appeal unfavorable SAP determinations; and
- have procedures for students to reestablish that they are again maintaining SAP.

Do you have any questions?

Here are some for you.



Instructor's Notes

Q: What must a school do at the end of the second year?

A: At the end of the second year, a school must determine if the student has a “C” grade-point average, its equivalent, or has an academic standing consistent with the school’s graduation requirements.

Q: Under what circumstances may a school determine that a student is maintaining SAP even if the established standards are not satisfied?

A: If the reason for not meeting the standard is:

- the death of a student’s relative,
- a student’s injury or illness, or
- other circumstances that resulted in undue hardship to the student.

Here’s a true-or-false question before we work on creating an SAP policy that complies with the regulations.

Q: Once a school determines that a student has not maintained SAP at the end of the second academic year, the school may never again determine the student to be making SAP. True or false?

A: Of course, the answer is false.

But here’s a less obvious question.

Q: When may a school determine the student is again making SAP?

A: Students who have not maintained SAP at the end of the second year, but have come into compliance with institutional graduation requirements at the end of a subsequent grading period, may be considered to be making SAP beginning with the next grading period.

Instructor's Notes

Let's move on to creating an SAP policy based on the regulations we've just reviewed.

CREATING THE POLICY

A school's SAP policy must be in writing. So, we'll begin by discussing the required components of a written SAP policy.

This policy must include both a qualitative measure (grades) and a quantitative measure (time).

Although schools may set their own stricter requirements, the law specifies that, by the end of the student's second year: (OH 2)

- a student must have a “C” average or its equivalent” **or**
- a student must have an academic standing consistent with the requirements for graduating from the program.

The law also specifies that the school must check satisfactory academic progress: (OH 3)

- at least once each academic year **or**
- by the midpoint of a program that is less than or equal to one academic year in length.

Before we look at the SAP elements in greater detail, are there any questions so far?

The Qualitative Measure

The **qualitative measure** of your school's written SAP policy must use grades, work projects, or other comparative factors that can be used against a norm to gauge the academic progress of your students.

The way grades are determined and used in your school's SAP policy is within your school's discretion, as long as the “C” average or its equivalent” is taken into account.

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Instructor's Notes

- For example, for a school that measures achievement using work projects, students must successfully accomplish certain tasks to the satisfaction of instructors. Successful completion of these projects or tasks results in satisfactory progress and is, therefore, equivalent to at least the “C” average.

The Quantitative Measure

Your school policy must also include a **quantitative measure**, one that sets the maximum time frame in which students are expected to complete their academic programs. The maximum time frame for program completion may not exceed 150% of the published length of the program measured in academic years, terms, credit hours attempted, or clock hours completed. Schools may set the time frame at less than 150%, but not more than that.

For instance, a student enrolled full time in a two-year program must graduate in, at most, three years, which is 150% of two years. If the school chooses, the maximum time frame for completion may be two-and-one-half years, but three years would be the maximum allowed by regulations.

- The measurement may be in academic years, as given in the example, or in terms, credit hours attempted, or clock hours completed.

Students who fail and/or withdraw put themselves in danger of failing to complete a program within the specified time frame.

Increments for Checking SAP

Because the law specifies when and how often schools must check for satisfactory academic progress, a student's enrollment status comes into play. Half-time students certainly aren't expected to complete a program as quickly as full-time students, therefore, schools must divide all

students' programs into equal increments. Satisfactory academic progress is checked at the end of each increment.

The increments: (OH 4)

- may be no longer than half the program or one academic year, whichever is less; and
- must coincide with payment periods.

Please take a few moments to read pages 2-20 and 2-21 in Chapter 2 of your Handbook.

» Allow participants 1 minute to read the information.

Once the school has defined the length of these increments, the school must compare the amount of work the student attempted to the amount of work that was successfully completed. Naturally, a student enrolled part time will not attempt as many credit or clock hours as a student enrolled full time. However, the **percentage** of classes completed is comparable, regardless of enrollment status.

- Schools can require an equal percentage or amount of work to be successfully completed in each increment, or allow a student to increase his or her work load as time passes.
- This allows freshmen, for instance, to take a lighter schedule as they adjust to college life.

The percentage of hours that a student must have completed at the end of each increment must be great enough to ensure that students successfully complete their entire program within the allowed maximum time frame.

OTHER CONSIDERATIONS

Class-Completion Issues

Four important situations to also consider for your SAP policy are: (OH 5)

Instructor's Notes

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Instructor's Notes

- Course incompletes—Your school must decide at what point an incomplete grade becomes a failure.
- Drops/withdrawals—Your school must determine at what point a drop/withdrawal becomes a penalty to a student's grade point average.
- Course repetitions—Your school must define what effect repeating courses has on a student's GPA for purposes of the SAP qualitative measure.
 - Note that course repetitions count toward courses attempted, thereby also affecting the quantitative measure.
- Your school should specify the effect noncredit remedial courses have on a student's SAP.

Some examples of these issues are found on page 3 of your Workbook. [IG, pg. 13]

PW 3**CASE STUDY**

Please turn to the sample SAP policy on pages 4 and 5 of your Workbook. [IG, pgs. 14 and 15] Then complete the case study on page 8.

PW 4-5**PW 8**

» Allow participants 5 minutes to read the sample SAP policy and complete the case study.

Q1: After attending classes for nine months, Howard completed 550 hours and had a cumulative grade average of 69.9. Is he making satisfactory academic progress?

A1: No, Howard is not making satisfactory academic progress. While his grade average is above the minimum 65, he has not completed the minimum 600 clock hours.

Instructor's Notes

Q2: Can Howard continue to receive financial aid?

A2: Yes. Howard can receive financial aid for the following 4.5-month (18-week) period, because he is eligible, even though he is on probation.

Q3: What would happen if Howard failed to meet SAP standards at the end of the 4.5-month probation period?

A3: Howard would no longer be eligible for federal financial aid.

Q4: If this were to happen, what could Howard do?

A4: Howard could:

- **reestablish eligibility by successfully completing the required number of hours and by attaining the needed overall cumulative grade average at the end of the next period or**
- **appeal this decision to the school's director of financial aid by stating—in writing—acceptable reasons why the minimum requirements were not met.**

The Student Appeal Process

Your school's SAP policy must include procedures for students to appeal adverse SAP decisions, as well as requirements for reinstating eligibility for Title IV aid.

Take a look at the sample appeal policy that begins on page 6 of your Workbook. [IG, pg. 16]

» Allow participants 2 minutes to look over the sample policy.

PW 6

Instructor's Notes***Individual Student Circumstances***

When appealing SAP decisions, some students might cite unique situations. Your school should have a procedure for evaluating these mitigating circumstances. The procedure should be:

- at the school's discretion,
- part of the school's written SAP policy, and
- documented in the student's file.

As we discussed earlier, your school may choose to adjust SAP requirements for reasons such as: (OH 6)

- student injury or illness,
- death of a student's relative, **or**
- other circumstances resulting in undue hardship to the student.

Conditional or Probationary Period

In addition to the required appeal procedures on the basis of mitigating circumstances, your school may, but is not required to, include a reasonable conditional or probationary eligibility period in its written SAP policy. (The case study we just finished includes a probationary eligibility period.)

- The probationary period may be applied as a blanket-type policy to all students who fail to meet one or more requirements. An individual case examination is not required.
- Whether students are placed on probation due to mitigating circumstances or because the institution has a blanket-type probationary policy, your school must ensure that students clearly understand the reasons for the probation and their resulting responsibilities.

Instructor's Notes

- When students are placed on probation, it must be documented in their records.

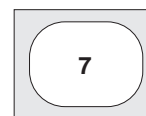
A student must still maintain satisfactory academic progress during a probationary period or following an evaluation of mitigating circumstances.

On page 7 of your Workbook [IG, pg. 17], there are two sample policies that allow for a probationary period. You might want to use these examples for guidance when developing a probationary policy at your school.

PW 7**Regaining Eligibility**

Students who lose eligibility for Title IV aid because they do not make satisfactory academic progress regain eligibility when they again meet the school's standards.

- For all Pell Grant and campus-based aid, a student may be paid for the payment period in which he or she regains satisfactory academic progress. (OH 7)
 - For instance, a student who is ineligible at the beginning of the year but regains eligibility in the middle of the second semester can be paid for the entire second semester, but not the first semester.
- For Direct Loans and FFEL Program loans, a student may be paid for the entire period of enrollment (which is usually the entire academic year) once he or she regains eligibility.

**Consistent Application**

Finally, SAP standards must be applied consistently to all Title IV students or to programs established by your school and to all students within a given category (such as full-time, part-time, undergraduate, or graduate students).

Are there any questions about SAP? Again, the Handbook is an excellent source of information on this topic.

REVIEW QUIZ

Now, turn to the review quiz on page 9 in your Workbook and look at the first question.

Q1: If a student is enrolled in a 900-clock-hour program, by what point should the school measure the student's academic progress?

A1: After the student completes 450 clock hours.

Q2: For a 2,000-clock-hour program, how long could the increments be?

A2: 900 clock hours (one academic year).

BACK AT THE OFFICE

You should create an SAP policy and an SAP appeal policy or become familiar with your school's existing SAP policies. Also make sure that your SAP policy is applied consistently to all Title IV students within a given category.

What else should you do when you return to your office?

Instructor's Notes**PW 9****PW 10**

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--

(1) Are the same as or stricter than the institution's standards for a student enrolled in the same educational program who is not receiving assistance under a Title IV, HEA program;

(2) Include the following elements:

(i) A qualitative component which consists of grades (provided that the standards meet or exceed the requirements of Sec. 668.34), work projects completed, or comparable factors that are measurable against a norm.

(ii) A quantitative component that consists of a maximum timeframe in which a student must complete his or her educational program. The timeframe must--

(A) For an undergraduate program, be no longer than 150 percent of the published length of the educational program measured in academic years, terms, credit hours attempted, clock hours completed, etc. as appropriate;

(B) Be divided into increments, not to exceed the lesser of one academic year or one-half the published length of the educational program;

(C) Include a schedule established by the institution designating the minimum percentage or amount of work that a student must successfully complete at the end of each increment to complete his or her educational program within the maximum timeframe; and

(D) Include specific policies defining the effect of course incompletes, withdrawals, repetitions, and noncredit remedial courses on satisfactory progress;

(3) Provide 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;

(4) Provide for a determination at the end of each increment by the institution as to whether the

student has met the qualitative and quantitative components of the standards (as provided for in paragraphs (e) (2) (i) and (ii) of this section);

(5) Provide specific procedures under which a student may appeal a determination that the student is not making satisfactory progress; and

(6) Provide specific procedures for a student to re-establish that he or she is maintaining satisfactory progress.

Sec. 668.32 Student eligibility-general.

A student is eligible to receive Title IV, HEA program assistance if the student...

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

Sec. 668.34 Satisfactory progress.

(a) If a student is enrolled in an program of study of more than two academic years, to be eligible to receive Title IV, HEA program assistance after the second year, in addition to satisfying the requirements contained in Sec. 668.32(f), the student must be making satisfactory [progress] under the provisions of paragraphs (b), (c) and (d) of this section.

(b) A student is making satisfactory progress if, at the end of the second year, the student has a grade point average of at least a "C" or its equivalent, or has academic standing consistent with the institution's requirements for graduation.

(c) An institution may find that a student is making satisfactory progress even though the student does not satisfy the requirements in paragraph (b) of this section, if the institution determines that the student's failure to meet those requirements is based upon--

(1) The death of a relative of the student;

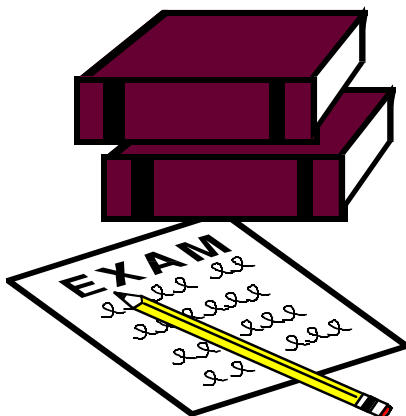
(2) An injury or illness of the student; or

(3) Other special circumstances.

(d) If a student is not making satisfactory progress at the end of the second year, but at the end of a subsequent grading period comes into compliance with the institution's requirements for graduation, the institution may consider the student as making satisfactory progress beginning with the next grading period.

(e) At a minimum, an institution must review a student's academic progress at the end of each year.

Class Completion Issues



Example 1—excluding “F” grades.

A policy might read:

“The following will be considered as hours attempted, but the following will not be considered as successfully completed credits:

‘F’ — failing grades,

‘I’ — incompletes,

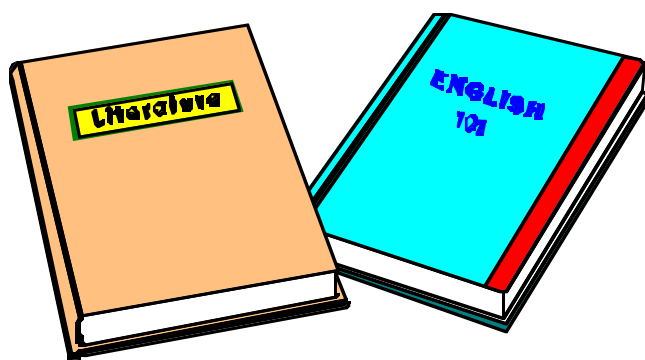
‘W’— withdrawals, and

‘U’ — unofficial withdrawals.”

Example 2— including course repetitions in the time frame and the GPA calculation.

A policy might read:

“When a student receives a passing grade in a course and subsequently repeats the course, the hours earned in both will count in the calculation of hours attempted and completed hours earned; all grades received for the courses will be included in calculating the GPA.”



Note

Schools can decide how to handle grades from repeated courses. They may take the higher grade, average the grades, or use both grades.

Satisfactory Academic Progress (SAP) Policy for Birmingham College (Non-Term)

To be making satisfactory academic progress toward a degree or certificate, students must maintain specified grade averages **and** proceed through the program at a pace leading to completion within a specified time frame. Satisfactory academic progress will be measured every 4.5 months (or every 18 weeks).

Required Grade Averages

At the end of each increment, the cumulative grade average will be determined and documented in each student's official record. Students achieving the averages specified in the chart below will be considered to be making satisfactory academic progress:

After this number of months	4.5	9	13.5	18
Students must have at least this cumulative grade average	60%	65%	70%	70%

Required Completion Rate

In addition to the cumulative grade average listed above, students must also be progressing toward successful completion of the program within a maximum time frame. Students in this program must contract for 25 hours per week and successfully complete the program within 18 months at the following rate:

After this number of months	4.5	9	13.5	18
Students must have completed at least this number of clock hours	300	600	900	1200

Probation and Reinstatement Procedures

In the event that a student fails to meet **any** of the above criteria for a specified period (every 4.5 months), the student will be placed on probation for one period. A student in this category may receive financial aid for the probation period. However, by the end of the probation period, the student must meet the stated minimum grade and completion requirements as defined on the school's completion chart in order to receive additional financial aid.

Satisfactory Academic Progress (SAP) Policy for Birmingham College (Non-Term) (cont'd)

If a student fails to meet one or more of the requirements by the end of the probation period, the student will no longer be making satisfactory academic progress and will be ineligible for federal financial aid.

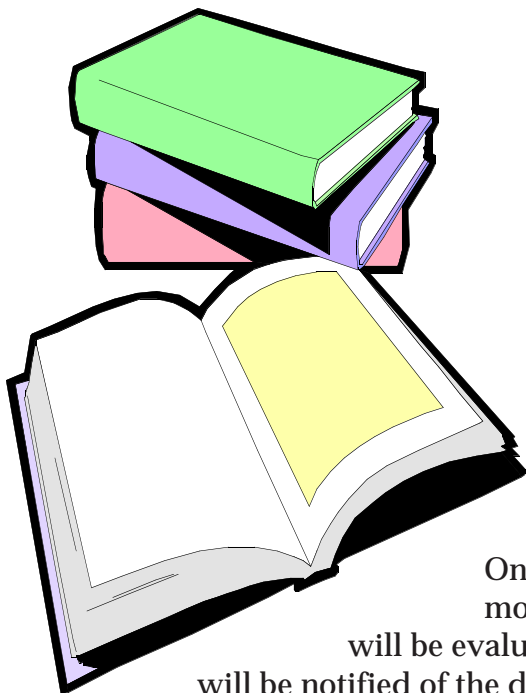
Students terminated from receiving financial aid can reestablish eligibility by successfully completing the required number of hours **and** by attaining the overall required cumulative grade average by the end of the next period. Withdrawal from school has no effect on the student's satisfactory academic progress upon reentering.

All grades are given in numeric averages. The lowest grade average to pass a class is 60. Hours completed below this minimum average will not be considered successfully completed. However, a student must achieve a cumulative grade average of at least 70 in order to graduate.

Appeal Procedures

If a student is found to be ineligible for federal financial aid because satisfactory academic progress requirements were not met, the student may appeal this decision to the school's Director of Financial Aid by stating—in writing—the reasons why the minimum requirements were not met and why financial aid should not be terminated.

The Director of Financial Aid will review the appeal and determine whether suspending financial aid is justified. The student will be advised, in writing, of the decision.



Appeal Policy

On written appeal by a student, failure to meet one or more satisfactory academic progress requirements will be evaluated by the financial aid administrator. A student will be notified of the decision within two weeks of the financial aid office receiving the written appeal request. The following types of information may be considered in determining if a student is still maintaining satisfactory academic progress:

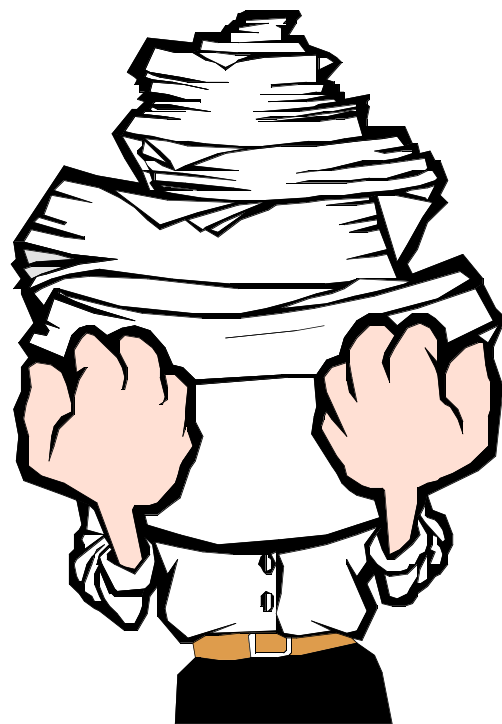
1. Unusual circumstances, such as extended illness;
2. Participation in campus tutoring or support services;
3. Class attendance and completion of assignments; and
4. Changes in educational objective.

If students are terminated from receiving financial aid for failure to maintain satisfactory academic progress, they must meet all requirements for minimum overall grade and cumulative credits earned for their academic level before eligibility for aid can be reinstated. Periods of nonenrollment in school have no effect on a student's satisfactory academic progress status on reentering.

Academic Probation Policy

Example 1: One-Academic-Year Probation

Students who fail to meet one or more of the satisfactory academic progress minimum requirements will be placed on satisfactory progress probation for one academic year. During that academic year, students must meet the stated minimum grade requirements and complete enough work to meet the cumulative amount of work for that academic year as defined by the school's credit-completion chart. The second time students fail to meet one or more requirements, they will no longer be making satisfactory academic progress and will be ineligible for financial aid for the following academic year.



Example 2: One-Month Probation

Full-time students whose satisfactory completion rate falls below an average of 120 clock hours per month will be placed on probation for one month. During this time, students must complete enough clock hours to raise their average back up to 120 clock hours. Failure to raise their average within that month means students are not maintaining satisfactory academic progress, and they are ineligible for financial aid until that average is raised to the required minimum.

