

Satisfactory Academic Progress

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Monograph 25 is the third edition of a NASFAA publication that first appeared in 1982. Practicing financial aid administrators and NASFAA staff have prepared this document for reviewing and evaluating an institution's satisfactory academic progress standards as part of NASFAA's continuing effort to assist financial aid administrators in fulfilling their professional responsibilities.

Satisfactory academic progress (SAP) requirements are meant to insure that students are able to complete their academic program in a timely manner through achieving minimum academic standards. In an age of increasing accountability for the use of federal, state, and institutional student aid funds, institutions of higher education **and** their students must demonstrate that financial aid funds are being used to assist students in efficiently completing their academic goals.

As part of the Program Integrity Final Rule that was published on October 29, 2010, with implementation of most changes July 1, 2011, new satisfactory academic progress regulations have standardized several definitions while still permitting institutions some level of flexibility in the development and implementation of their satisfactory academic progress policies on their campuses.

One of the many achievements of the new SAP regulations is that all regulatory references regarding satisfactory academic progress now point to one section in the Compilation of Federal Regulations (CFR) – Student Assistance General Provisions (34 CFR 668.34). Any references to SAP in 668.16(e) (Administrative Capability) and 668.32(f) (Student Eligibility-General) now clearly refer the reader to 668.34 for a complete explanation of the SAP requirements.

The SAP regulations require an institution to “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” [668.34(a)]. A reasonable SAP policy includes the following:

- 1) Requirements that are at least as strict as the institution’s academic progress policy for nonTitle IV aid recipients;
- 2) Consistent application of standards to all students within institutionally-defined categories of students;
- 3) Frequency of evaluation which may occur once per payment period but which must occur at least annually;
- 4) Specified grade point average (GPA) requirement, or its equivalent measured against a norm for institutions which do not measure qualitative progress using GPA;
- 5) Pace requirement which ensures that the student will complete the academic program within the specified maximum time frame;
- 6) Clarity on effect of course incompletes, withdrawals, repetitions, or transfers of credit from other institutions, on GPA and pace of completion;
- 7) Clear status definitions which communicate that students who do not achieve SAP at each evaluation period are no longer eligible to receive federal student aid;
- 8) Provision for a financial aid warning status for those institutions which evaluate students’ progress once per payment period;
- 9) Clear process for appeals for those institutions which permit appeals;
- 10) Description of how ineligible students may restore eligibility for federal student aid funds; and
- 11) Description of the student notification process when eligibility for aid is affected by SAP evaluation.

This updated NASFAA Monograph addresses each of the policy requirements to assist institutions in determining how “reasonable” their SAP policy is in ensuring compliance with the new federal regulations while also promoting a campus culture of academic success for students. The monograph includes case studies, checklists, a glossary of terms, regulations, and other resources which will assist financial aid administrators in evaluating their institution’s SAP policy.

Formulating Institutional Policy

Federal regulations require *institutional* compliance, not just compliance from the financial aid office. In the efficient separation of functions, it is easy for some institutions to develop a “silo” effect in their operations, in which one office assumes responsibility for implementation of a certain set of functions and rarely discusses their internal operations with other campus offices. In so doing, these “silo” operations sometimes create duplicative processes but more often result in policies and procedures that conflict. The development of institutional SAP standards is not immune to the potential of this “silo effect.” Thus it is extremely important that institutions involve cross-campus communication at every level of the development and implementation of SAP policies and standards.

As federal SAP standards may ultimately impact the ability of students to receive financial aid funds to assist in paying their cost of attendance, an institution may find it essential to engage in a cross-campus conversation on retention and enrollment initiatives. Offices involved in these conversations may include but are not limited to Admissions, Registrar, Financial Aid, Student Accounts, and Housing/Residence Life. Often these conversations focus on optimizing the institution’s enrollment count while balancing the myriad of external influences which may lead to a student’s decision to leave the institution. If the student faces a financial obstacle because he or she is no longer eligible to receive financial aid due to SAP standards, the financial aid office often becomes a central part of the conversation about identifying creative strategies for optimizing the institution’s enrollment.

Yet the concept of satisfactory academic progress is about more than just enrollment. It is ultimately about **student success** and **accountability**. Institutions are strongly encouraged to engage in conversations across the campus about strengthening programs that promote student success while reminding students of their accountability to the taxpayer-funded Federal Student Aid programs. Offices involved in these conversations should include enrollment-focused offices like those aforementioned but should also include other offices such as academic affairs, faculty, tutoring center, counseling, academic advising, and others. These offices typically see students on a more routine basis throughout the semester with more opportunities for communicating with students about the importance of being academically successful and the opportunities available to assist students in achieving that success.

Ultimately, the institution must develop and implement a SAP policy that is compliant with the minimum requirements established in federal regulations while also addressing the institution’s mission and goals. This is why the development and implementation of a SAP policy must be an *institutional* conversation, not simply internal to the financial aid office. Furthermore, the conversation should not end with policy development. Interested institutional stakeholders must

periodically re-evaluate the SAP policy and its implementation to seek improvement, while also maintaining compliance with federal standards and an institutional focus on student success.

Policy Components

To be eligible for Federal Student Aid (FSA) funds, a student must make satisfactory academic progress, and your institution must have a reasonable policy for monitoring that progress. An institution is free to utilize its own standards as well as those from the state, accrediting agencies, or other governing entities when creating its SAP policy, as long as it is understood that for purposes of delivering Federal Student Aid, the institutional policy and its implementation must meet the minimum federal standards as outlined in 668.34.

“Same As or Stricter Than” Criterion

Under federal regulations, the SAP policy for students receiving Federal Student Aid must be at least as strict as that for students who are not receiving FSA funds at your school, and the policy must apply consistently to all educational programs and to all students within categories (e.g., full-time, part-time, undergraduate, and graduate students). It must also require SAP evaluation at the end of each payment period for students in programs lasting one year or less, and for all other programs at least annually and corresponding with the end of a payment period.

Given the diversity of institutions, each institution must consider its options and formulate its policy based on what is in the best interest of its students and its own institutional mission. The initial decision is to determine whether the existing academic standards of the institution are sufficient for purposes of determining eligibility for federal financial aid and meeting federal regulations. Some institutions consider it unwise to develop two sets of academic standards, one general and one for financial aid recipients, since this treatment could be inconsistent and perhaps arbitrary. Conversely, other institutions recognize that public funds are limited and perhaps require more rigid parameters of eligibility for financial aid. This would cause recipients of federal student assistance to be subject to a different, more demanding standard of academic performance than the institution imposes for continued enrollment purposes.

Some accrediting agencies or state higher education boards may also have their own satisfactory academic progress policies for their aid programs. Rather than have different policies for different aid programs, many institutions choose to apply the strictest policy to all aid programs. In those instances, the institution must ensure that the policy addresses all of the parameters required under the SAP standards as outlined in 668.34.

An institution’s mission may influence the standards it sets in admitting students, which may subsequently have an impact on financial aid SAP policy. For example, open-access community colleges or publicly-supported institutions may be required to embrace the concept that all students be allowed to enroll regardless of past or current academic performance. At such institutions, standards to maintain financial aid eligibility that are more rigorous than those otherwise used by the institution may need to be developed. Other types of institutions may have different admissions criteria or curriculum offerings for special categories of students. In such cases, particular attention should be given to developing standards that are responsive to the unique needs of these particular groups of students while also addressing the minimum SAP standards as outlined in 668.34.

Consistency

No matter what the institution type, the utmost care should be given to developing and implementing consistent policies. Federal regulations require that SAP standards be applied consistently to all Federal Student Aid programs and to all FSA recipients within identifiable categories of students. Institutions have discretion as to how to define “categories of students.” The most common categories include undergraduate students, graduate students, full-time students, and part-time students. Whereas these categories are identified by the institution, consistent application of the institution’s SAP policy within these categories is required.

Frequency of Monitoring and Evaluation

At a minimum, an institution must review a student’s academic progress once per year (annually) at a designated time that coincides with the end of a payment period (usually the end of the academic year or award year). Institutions may choose to monitor SAP more frequently than once per year at the end of each payment period within the award year. Institutions that choose to monitor SAP at the end of each payment period may use the financial aid warning status, which will be discussed in a later section in this monograph.

Institutions that choose to monitor SAP annually cannot use the financial aid warning status. Students monitored on a yearly basis must be meeting SAP requirements when academic progress is reviewed. Students who are not meeting SAP at this time are not eligible to receive Federal Student Aid funds until they restore their eligibility. Restoration of eligibility can be through the student’s effort in subsequent semesters or through the submission of an appeal if the institution permits appeals. The topic of appeals will be discussed in a later section in this monograph.

Grade Point Average Standard

Previous SAP regulations referred to two standards as “qualitative” and “quantitative.” Where there is still some reference to these two terms, the SAP regulations under the October 29, 2010, Program Integrity Final Rule use new terminology – grade point average and pace.

The **grade point average standard** (GPA; formerly qualitative) defines the quality of the student’s academic work. A GPA is typically a numerical equivalent based on a formal definition of grades at the institution. However, for those institutions that do not consider GPA as an appropriate qualitative measure, they must define in their SAP policy a comparable qualitative measurement against a defined norm.

Students enrolled in a program of more than two academic years must have a GPA of at least a “C” or its equivalent or must have an academic standing consistent with the school’s graduation requirements. Having an academic standing consistent with the requirement for graduation means a school could use a graduated GPA instead of a fixed one. For example, if your school uses a 4.0 GPA scale, it could require students to have a 2.0 average by graduation but allow their average to be lower earlier in the student’s program. If the school’s policy permits such a progression and a student falls below a C average, the institution must be able to document that the student’s average is consistent with the academic standard required for graduation.

Pace of Progression and Maximum Time Frame

The institution’s SAP policy must also specify the pace of progression (formerly the “quantitative” standard) at which students must progress through their program of study to ensure that they will graduate within the permitted maximum time frame, and each SAP checkpoint must measure the student’s pace. Institutions must calculate the pace at which a student is progressing by dividing the total number of hours the student has successfully completed by the total number the student has attempted. Remedial coursework may be excluded from the calculation.

Checking a student’s pace of progression allows for variations of enrollment status since the school monitors the percentage of classes successfully completed rather than the number. Also, schools may use a graduated completion percentage for each year of a program. For instance, the institution’s policy can permit students to complete a lower percentage of their classes in the first academic year but require them to complete an increasing percentage in subsequent years so that they finish their program within the maximum time frame.

Maximum Time Frame

For undergraduate students, Federal Student Aid funds cannot be paid to a student who exceeds 150 percent of the published length of the degree program. For graduate students, the maximum time frame is defined by the school based on the length of the program.

Maximum time frame does not always measure actual time spent in the degree program, particularly for those enrolling less than full time in some or all periods. Instead, maximum time frame is measured in terms of the number of credit or clock hours required to complete an academic program.

The monitoring of the student’s pace will facilitate satisfying maximum time frame throughout enrollment. However, a student who repeatedly changes academic programs may not be apparent on an evaluation of pace but may violate the maximum time frame criterion.

Other Considerations

The institution’s SAP policy must explain how both the GPA and pace of progression standards are affected by course incompletes, withdrawals, repetitions, and by transfer credits from other institutions. Other factors that may need to be addressed in an institution’s SAP policy can include (but are not limited to) changes of major or program of study and academic amnesty.

Incompletes and Withdrawals

The institution’s SAP policy must define how incomplete grades and withdrawal grades count in the earned hours to attempted hours ratio. The challenge with incomplete grades is that they may be converted at a later time to either a successful grade or an unsuccessful grade. Where an incomplete grade may not impact the student’s GPA or pace standards at the time of the initial evaluation, what happens later when the grade is converted? Pass or fail? Does the student gain or lose financial aid eligibility? If so, do you consider any retroactive impact to the time the original grade was assigned? These considerations need to be reviewed by appropriate institutional representatives to ensure appropriate SAP policy decisions.

In determining the impact of how withdrawn courses count toward a student’s SAP standing, it is important to consider the impact toward the student’s pace of progression and maximum time frame while also balancing these considerations against the value of the Federal Student Aid programs and the accountability that is required at both the student level and the institutional level in ensuring prudent stewardship of taxpayer dollars that fund the Federal Student Aid programs.

Course Repetitions

The Program Integrity Final Rule also carried a significant set of changes regarding repeated coursework. However, most of these changes impact the definition of a full-time student which falls under 668.2(b). This monograph will not explore the impact of repeated coursework as it defines a full-time student.

For purposes of SAP, the federal regulations remain clear that the institution's SAP policy must address how repeated coursework will impact a student's continued eligibility for financial aid. When evaluating a student's SAP standards, how do repeated courses factor into the GPA calculation? Does your institution replace prior courses or count all attempted courses into the GPA? If it replaces prior courses, which grade counts – the best grade, or the most recent grade? Many of these decisions are usually made on the academic side of the institution, but it is very important that the financial aid office is aware of this calculation process for purposes of understanding how a student's financial aid eligibility could be impacted. Repeated courses may also impact earned hours and attempted hours, which could also affect the student's pace of progression. These considerations for repeated courses must be included in the institution's SAP policy.

Transfer Credit

The SAP regulations state that an institution's SAP policy must describe how a student's GPA and pace of completion are affected by transfer of credits from other institutions. Hours accepted toward a student's educational program must now count as both attempted hours and completed hours when calculating pace for satisfactory academic progress.

Institutions may have different academic policies regarding the inclusion of transfer grades into the student's GPA – some factor the grades into the cumulative GPA and therefore the SAP measurement, while others only include courses in the GPA that were taken at the institution itself.

At a minimum, transfer credits that count toward the student's current program must count as both attempted and completed hours. But what about the student whose prior academic history at previous institutions was not that grand, and the courses and grades earned at those prior institutions are not transferred to your institution based on your institutional transfer of credit policy? It is quite possible that the student exceeded the maximum time frame at those prior institutions, yet because your institution accepts only those courses that will apply toward his or her current academic program, he or she gains eligibility for Federal Student Aid funds based on your institution's evaluation of his or her academic standing. How does the financial aid office balance these considerations against the value of the Federal Student

Aid programs and the accountability that is required at both the student level and the institutional level in ensuring prudent stewardship of taxpayer dollars that fund the Federal Student Aid programs?

Changes of Major or Program of Study

Generally, all periods of the student's enrollment count when assessing progress, even periods in which the student did not receive FSA funds. However, your institution's policy may permit that for students who change majors, prior credits and grades that do not count toward the new major will not be included in the SAP determination. The school may limit how many times a student can in this way "reset" academic progress by changing majors. Yet it continues to remain important to balance these considerations against the value of the Federal Student Aid programs and the accountability that is required at both the student level and the institutional level in ensuring prudent stewardship of taxpayer dollars that fund the Federal Student Aid programs.

Academic Amnesty

The SAP regulations do not provide for the concept of academic amnesty whereby students apply to have credits attempted or grades earned excluded from the GPA calculation. A school must include courses applicable to a student's major – whenever taken – in evaluating SAP. The school must define in their SAP policy of how academic amnesty is treated and if an appeal is possible.

Clear Status Definitions

If a SAP checkpoint shows that a student does not have the required GPA and/or is not maintaining the required pace of progression, the student becomes ineligible for FSA funds unless he or she is placed on financial aid warning or financial aid probation. The institution's policy must describe both of these statuses if it allows for them, and it must provide for notification to students of the results of any evaluation that affects their eligibility for FSA funds.

Loss of Financial Aid Eligibility

A student becomes ineligible for all federal student aid funds if a SAP review indicates he or she does not meet the required GPA, is not maintaining the required pace, or has exceeded the permitted maximum time frame.

Financial Aid Probation

The financial aid probation status can be used by any school. Financial aid probation can be granted only after the student has appealed and has had eligibility for aid reinstated based on the appeal. The decision to permit appeals and the methods involved in reviewing appeals is up to each institution, but these must be clearly outlined in the institution's SAP policy.

If a school permits appeals, and if a student is successful in the submission of a SAP appeal (meaning that the institution accepted the student's appeal and has decided to grant continued financial aid eligibility), then the student must be placed on financial aid probation for a period not to exceed one payment period, unless the school develops an academic plan for the student that covers a longer period of time. For institutions which only monitor SAP once per year, they must have the methods in place to monitor the students who are placed on financial aid probation at the conclusion of the probationary payment period, not at the next scheduled annual review.

Financial Aid Warning

Only institutions that check satisfactory academic progress at the end of each payment period may place students on financial aid warning as a consequence of not making SAP. An institution may do this without an appeal or any other action by the student. The financial aid warning status lasts for one payment period, during which the student may continue to receive FSA funds. The financial aid warning status gives the student another payment period to reach minimum SAP requirements. Many institutions are adopting and strengthening some early intervention efforts through this financial aid warning period. Students who are still failing to make SAP after the financial aid warning period lose their aid eligibility unless they successfully appeal and are placed on financial aid probation, which may include the approval of an academic plan.

Appeals

Federal regulations allow an institution to use professional judgment on a case-by-case basis if the financial aid administrator determines that an unusual or extraordinary situation affected the student's progression toward the successful completion of his or her program of study. Consequently, it is essential to establish an appeal mechanism through which personal mitigating circumstances can be evaluated, and when appropriate, exceptions can be made to the institution's SAP policy for individual situations. Notwithstanding, it is totally within the purview of the institution whether to permit the opportunity for an SAP appeal.

To meet this objective, an institution's SAP policy should clearly define what types of unusual circumstances may be considered. In addition, the institution is required to clearly state what steps a student would need to take to initiate an appeal of his or her SAP status. While care needs to be taken to avoid unnecessarily restricting the institution's options to grant an appeal, a clear statement of the conditions under which an appeal will be considered may reduce unnecessary burdens on those institutional representatives selected to review appeals and may help curb unrealistic hopes for students. For example, a failure to meet the GPA and/or pace components for a given enrollment period because of illness or injury of the student or the student's dependent might be a reasonable reason to appeal. Another example of an extraordinary circumstance which could constitute an appeal could be the death of a family member.

Common situations that may cause a student to fail to meet SAP standards include:

- Family difficulties, such as divorce or illness;
- Interpersonal problems with friends, roommates, significant others;
- Difficulty balancing work, athletics, family responsibilities, etc., and school; and
- Financial difficulties.

If the institution decides to permit SAP appeals, the procedures for the appeal process must be clearly described in the institution's SAP policy. The following information must be included:

- The basis on which a student may file an appeal, such as death of a relative, injury or illness of the student, or other special circumstances; and
- Any items to include in the appeal documentation, including:
- Why the student believes he or she failed to make SAP; and
- What has changed in the student's situation that will allow him or her to demonstrate satisfactory academic progress at the next evaluation.

Each institution determines the process and documentation required for an appeal. It may decide to require more extensive information on an initial appeal and some type of an update statement on a subsequent appeal.

Institutions process appeals in a variety of ways. Some institutions review student appeals internally within the financial aid office. Other institutions utilize an appeals committee made up of campus representatives outside of the financial aid office. Institutions should treat appeals on a case-by-case basis and should consider the circumstances which the student addresses in the appeal documentation.

Appeal Process

The terms and conditions of the appeal process must be well articulated within the SAP policy and communicated to the affected student. For example:

- Will the student be asked to complete a written appeal form?
- Will the student be asked to provide a letter detailing a specific plan for meeting SAP?
- Will the student be asked to provide a statement from an academic advisor supporting the plan for meeting SAP standards?
- Will the appeal process place any additional requirements upon the student such as participation in additional academic counseling, course tutoring, remedial course work, etc.?
- How will the unusual or extraordinary circumstance leading up to the appeal be documented?
- How often may a student appeal his or her SAP status?
- Will the student be asked to meet face-to-face with an appeals committee or other designated individual?

Decision Making Process

An institution also must decide who will make appeal decisions. Some possible options are:

- One aid administrator reviewing all of the appeals;
- Different aid administrators reviewing appeals within certain subcategories of students (for example, by last name, class standing, course of study);
- A committee of aid administrators reviewing all of the appeals; and
- A committee including both aid administrators and other institutional personnel.

Each of these options has both advantages and disadvantages. For example, having one person review all of the appeals has the presumed advantage of consistency in decision making, but that may not be feasible because of the large number of appeals and other job duties. Committees in general can make more objective decisions than individuals do, but the committee process can be time consuming. Therefore, the structure of such an appeals committee should allow for the timely consideration of the individual appeals placed before it.

Although it is not a requirement, it is a good practice to include at least one representative from the financial aid office on the appeals committee in order to get a better grasp on paper flow and communication issues. The financial aid administrator may also be able to provide background information that only the financial aid office would have, such as appeal history, aggregate aid history, documented discussions with financial aid staff, requirements or prohibitions specified by federal

regulations, or Department of Education (ED) guidance, and so forth.

In addition to deciding who will make appeal decisions, the institution should also decide when and how often appeals will be considered. Depending on its resources and needs, an institution may choose to establish an appeal deadline. For example, institutions are allowed to review appeals throughout the payment period. However, an institution that uses an appeal committee may choose to set an earlier appeal deadline so that the committee doesn't need to meet continuously throughout the term.

Documentation

As with all professional judgment decisions, both the mitigating circumstances that are the basis of the SAP appeal and the appeal decision itself must be adequately documented in the student's file. A written appeal by the student is not required by regulation, although an institution may choose to require a written appeal as part of its policy. Written appeals are generally the easiest and most accurate method of collecting information about the student's circumstances. Written appeals can be submitted on an institutionally-designed form, or they can be a simple statement signed by the student.

The institution also needs to define what it considers to be acceptable documentation. For example, will it require that the student submit third-party documentation as part of an appeal? Who constitutes a third party? If the student is appealing based on illness, is a letter from the student's parent considered sufficient documentation, or is a letter from the student's physician required?

The action taken as a result of the appeal must also be documented. At a minimum, the student's file should be documented with the date the decision was made, why and by whom, and any references to applicable institutional policy. The institution should also document that it notified the student of the outcome of the appeal.

Financial Aid Probation

Financial aid probation status can be granted only after the student has appealed and has had eligibility for aid reinstated based on the appeal. The decision to permit appeals and the methods involved in reviewing appeals is up to each institution, but these must be clearly outlined in the institution's SAP policy.

When an institution places a student on financial aid probation as the result of a successful appeal, it must stipulate that the student is required to achieve minimum SAP standards at the end of the next payment period. If it is not possible to achieve the minimum SAP standards at the conclusion of the next payment period, the student must submit another successful appeal before the institution can place the student on an academic plan.

Institutions which only monitor SAP once per year must have the methods in place to monitor the students who are placed on financial aid probation at the conclusion of the probationary payment period, not at the next scheduled annual review.

Academic Plans

Sometimes, it may be mathematically impossible for a student on financial aid probation to achieve minimum SAP standards at the conclusion of one payment period. The mathematical impossibility may be related to GPA, pace, or both. In cases where one payment period is not sufficient for a student to meet minimum SAP standards, an institution may consider a long-range academic plan with appropriate checkpoints and milestones to be achieved by the student.

Academic plans should be tailored to the individual needs of the student based on the circumstances the student described in the SAP appeal. Examples of elements which an institution may consider in a student's academic plan include but are not limited to:

- Registering for fewer credit hours for the enrollment period;
- 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); and
- Enrolling in certain courses and demonstrating academic success in each of those courses.

Academic plans should not be developed by just one institutional office. The concept of academic plans should involve conversations with a variety of campus offices, including but not limited to Academic Advising, Counseling, Registrar, Residence Life, Academic Affairs, Academic Colleges, Academic Departments, Student Support, Student Life, Student Development, etc.

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 SAP standards at a specified future point in time.

The regulations do not specify what must be included in an academic plan. The institution and the student should develop a plan that ensures that the student is able to meet the school's SAP standards by a specific time, though an academic plan could instead take the student to successful program completion. Students who are meeting the conditions of an academic plan can work with the school to change the terms of the plan without submitting an appeal.

An academic plan could be voided by a school, and some of the possible reasons include:

- When a student changes major, then the previous plan is void since it pertained to the major at the time of the appeal;
- If a student violates the academic plan as defined and agreed upon for any reason; or
- If a student does not enroll for the payment period that the academic plan was designed to be applicable.

As part of the probationary period, the institution may specify in an academic plan the terms and conditions that the student will be required to fulfill within the period of probation, such as taking a reduced course load or enrolling in specific courses. Notwithstanding these terms and conditions *within* the probationary period, the student on financial aid probation must meet the minimum SAP standards at the next SAP evaluation or fulfill the requirements of the required academic plan at the *end* of the probationary period.

How Ineligible Students May Restore Eligibility for Aid

The institution's SAP policy, whether or not it permits appeals, must explain how students who are not making satisfactory academic progress can restore their eligibility for financial aid funds. Other than when a student is placed on financial aid warning, financial aid probation, or has agreed to an academic plan as outlined above, the student can regain eligibility only by taking action that brings him into compliance with the school's SAP standards.

The requirement that a student complete a specified number of credits, enroll in specified courses, or that he or she interrupt attendance for one or more academic periods, may be a part of academic plans. However, neither paying for one's classes without financial aid nor sitting out for a term will restore a student's satisfactory academic progress standing, so neither is sufficient to re-establish eligibility for financial aid funds.

Notifications and Disclosures

Clear communication with students regarding the institutional SAP policy is very important from the beginning of the enrollment process. Not only should this communication include the details of the standards, but it should also include how students will be informed in the event there are issues with meeting SAP standards. Being fully aware of the SAP policy allows students to make informed decisions about their enrollment activities.

Institutions may choose to send electronic communications or may decide to communicate with students through a paper format; perhaps there are multiple methods used in to order to maximize the

outreach. Regardless of the methods used, it is necessary to inform students when they are no longer eligible to receive Federal Student Aid funds due to failure to maintain SAP standards.

In addition to notification to students, communication across the various campus constituencies is tantamount to successful implementation of the SAP policy. Academic advisors, enrollment managers, the Registrar and others involved with the successful recruitment and retention of students should be fully informed of the policy and able to discuss its implications.

Notification to students regarding their satisfactory academic progress status as it relates to financial aid eligibility should be individual, confidential, timely, and informative. This includes notification of the evaluations at each SAP checkpoint as well as the result of an appeal. The procedures used in communicating the satisfactory academic progress status to students should be outlined in the institution's established SAP policy. For example, if the institution wishes to use an electronic form of communication in addition to traditional methods, this should be stated in the institution's policy. Keeping the student informed at all times is of utmost importance.

Policy Evaluation

The institution's SAP policy should be reviewed on a regular basis. The responsibility for this review should be clearly assigned to a staff member or institutional unit where there is a thorough understanding of the requirements of Federal Student Aid regulations and the expectations established at the institutional level. Areas of review should include the number of students who retain eligibility as well as the number of students who are placed on financial aid warning or completely lose eligibility for aid. If the institutional policy allows appeals, actions taken through that process need to be tracked and evaluated periodically.

Closely monitoring the impact of the current institutional SAP policy enhances the likelihood that future revisions to the policy will appropriately reflect the institution's student and academic characteristics. An annual review and assessment is recommended.

If SAP policies change, it is important (and required by Federal Student Aid regulations) to communicate that information clearly and thoroughly to students and the campus community with proper information regarding the implementation of the policy changes.

Conclusion

Regulations governing standards of satisfactory academic progress allow latitude at the institutional level to incorporate the mission of the institution and the characteristics of the students served by the institution. At the same time, these regulations provide sufficient guidance to insure that students who meet SAP standards will successfully obtain their educational goals within a reasonable length of time.

Clear and consistent communication with current and potential students is essential in the application of a well-developed policy. A successful SAP policy will enhance retention and treat students fairly. It implies integrity and good stewardship of the Federal support provided to the institution and its student population.

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SAMPLE POLICIES AND CASE STUDIES

Case Study One – Monitoring SAP without use of Financial Aid Warning

Sample University Policy: National Bachelor's University

Federal regulations require that all students who receive any federal or state financial assistance make measurable academic progress toward a degree at National Bachelor's University. Progress is determined quantitatively (hours attempted versus hours earned and maximum time frame) and qualitatively (GPA). Progress is monitored at the conclusion of the spring and summer semesters.

Enrollment

A minimum standard for full-time enrollment at the undergraduate level is 12 credit hours per semester. A minimum standard for part-time enrollment (at least half-time) at the undergraduate level is 6 credit hours per semester.

Quantitative

The maximum time frame in which a student must complete his or her degree cannot exceed more than 150 percent of the published length of the student's major. All undergraduate majors at NBU require a minimum of 126 hours to complete the degree. NBU undergraduate students can therefore attempt up to 189 hours and still be eligible for aid. Once 189 hours are exceeded, eligibility for aid would be suspended. All semesters and credit hours attempted are used toward the maximum time frame allowance regardless of whether or not the student received financial aid. All repeated courses, failed courses, withdrawals, courses taken from a change in major and transferred hours will count as credit hours attempted toward the maximum time frame.

In order to complete the necessary number of credit hours to complete a degree at NBU at an acceptable rate, students must complete two-thirds (2/3) of all hours attempted. All attempted hours will be totaled and multiplied by 67 percent (.67) to determine the number of credit hours a student must have earned. Grades of W, I, IP, NR, and F hours are counted as attempted hours, and will NOT count as earned hours. Retaking courses will add to the attempted total but will count only once as an earned credit.

Example:

Fall Hours Attempted	Spring Hours Attempted	Total Attempted	Student Must Earn
12	12	24 x .67 (2/3)	16
99	18 x .67 (2/3)	12	
66	12 x .67 (2/3)	8	

Qualitative/GPA

The minimum acceptable grade point average for undergraduate students is a 2.0 after 2 years (4 semesters).

Notification of Results

Students that do not meet SAP eligibility requirements will be notified via mail within two weeks of the conclusion of the semester.

How to Regain Eligibility

Quantitative-Maximum Time Frame

To regain eligibility, you must graduate and advance to a new career level (UG to GR).

Quantitative-Hours Attempted vs. Hours Earned

To regain eligibility, take courses at your own expense in a subsequent term or terms and meet the standards according to the cumulative credit hours completion ratio outlined above under the heading Quantitative. Once you have taken the courses and earned passing grades, you will need to notify the Office of Financial Aid to complete a clearance form.

GPA

To regain eligibility, complete courses at your own expense at NBU and raise your cumulative GPA to the acceptable standard. Once you have completed the course and raised your GPA, you will need to notify the Office of Financial Aid to complete a clearance form. Since GPA does not transfer, transfer hours do not affect the GPA component.

Right to Appeal

If there were extenuating circumstances (injury, illness, death of a relative) that prevented you from meeting the standards of our Satisfactory Academic Progress Policy, then you have a right to file an appeal with the Committee for Financial Aid Appeals. In this appeal you must explain the following items: 1.) The reasons why you did not meet satisfactory academic progress and 2.) What has changed now that will allow you to make satisfactory academic progress at the next evaluation? If your appeal is approved, you will be placed on financial aid probation for one term, and after the probationary period, you must be making satisfactory academic progress or successfully following an academic plan that has been developed for you. Appeal results will be sent via mail after decisions are made.

Application of Policy

Simon enrolled in his first semester at NBU. He registered for 15 credit hours in the fall semester but did poorly in one class, earning 12 credits and a grade point average of 1.6. He registered for 12 credit hours in the spring semester, and earned 9 credits, with a cumulative GPA of 2.0. Because Simon completed 77 percent of the credit hours he attempted (i.e., $21 \div 27 = 77\%$), he is considered to be in good standing at the end of the spring semester.

Simon enrolls in his next fall semester, and registers for 12 credit hours. He completes 3 hours. He registers for spring for 12 credit hours, and completes 3 hours. Because Simon completed 56 percent of the credit hours he attempted ($27/48 = 56\%$), he is considered to have failed satisfactory academic progress. The student can appeal and explain his circumstances or take courses and complete them to increase the percentage.

Simon chooses to appeal his circumstances and explain that in the fall and spring semesters, he suffered from migraine headaches, and documented that illness. The SAP Committee chose to put him on an academic plan, requiring him to earn 9 of 12 hours he is planning to take. At the end of that semester, if he meets that requirement, he will be back in good standing.

Case Study Two – Monitoring SAP with use of Financial Aid Warning

Sample University Policy: Success University

General Policy Requirements

To be eligible for financial assistance, a student must meet minimum satisfactory academic progress (SAP) standards as listed below each semester – fall, spring and summer. Satisfactory academic progress is defined as passing a required number of hours and achieving a required overall cumulative grade point average during each semester while pursuing a degree program.

Minimum Satisfactory Academic Progress Standards

Classification at Beginning of Semester	Total Hours Attempted in Each Semester	Total Hours To Complete Each Semester	Overall Cumulative Grade Point Average (GPA)*
Freshman	5 or less	Must earn all pursued	2.0
	6 – 8	3	2.0
	9 – 11	6	2.0
	12 or more	9	2.0
Sophomore, Junior, or Senior	5 or less	Must earn all pursued	2.0
	6 – 8	6	2.0
	9 – 11	9	2.0
	12 or more	12	2.0
Graduate	5 or less	Must earn all pursued	2.0
	6 – 8	6	2.0
	9 or more	9	2.0

*Overall Cumulative GPA = Total Quality Points ÷ Total Quality Hours

The above policy applies to all transfer, continuing, and re-entry students for all academic semesters or sessions, including students who have not previously participated in federal aid programs. The pace percentage can vary from 37.5 to 100 percent depending on your enrollment status.

- **Remedial or Developmental Courses** – Completion of these courses is considered in the total hour requirement for receiving financial aid.
- **"I", "IN", "IP", "IPC", "W", "WN" or "NR" Grades** – Count as hours pursued, but do not count as hours earned until the course is satisfactorily completed according to the provisions in the university catalog. These grades do not affect grade point average.
- **Transfer Students** – In order to be eligible for financial aid, transfer students are required to be in good standing at all previous schools attended. Credit hours from another institution that are accepted toward the student's educational program must count as both attempted and completed hours. You must also have a 2.0 GPA for the last period of enrollment and meet the hour requirements in the Success Satisfactory Academic Progress Policy.
- **Repeated Courses** – The federal regulations indicate that financial aid may be paid for repeated coursework previously taken in the program but may not include more than one repetition of a previously passed course. This means courses for which you have passed with a grade of D or better can only be repeated once in your enrollment status to count for federal financial aid eligibility determination. After the second time the course is taken and a passing grade is earned, the credit hours for the repeated course will be excluded from your financial aid enrollment only.

- **Grade Changes** – Once a grade change has occurred, it is the student’s responsibility to contact this office to determine if it changes eligibility for financial assistance.
- **Academic Bankruptcy** – For financial aid purposes, hours dismissed through academic bankruptcy will count towards hours attempted/pursued but not towards grade point average except in the case of a transfer student where hours will count towards both hours attempted/pursued and grade point average.

Any students, other than transfer students, not meeting these requirements have not met the minimum satisfactory academic progress standards and will be placed on financial aid warning. (See Appeal Procedures)

- **Financial Aid Warning** – Students will be placed on financial aid warning status after their first semester of not maintaining SAP. Students on SAP financial aid warning are eligible for financial aid. No appeal is necessary. After their second consecutive semester of NOT maintaining SAP at Success University, their financial aid will be terminated. Not attending one or more semesters will not affect or change SAP status.

Attempted Hour Limitations

Federal regulations require academic progress to be measured by pace (quantitatively) as well as GPA (qualitatively), and the pace (quantitatively) measures may not exceed 150 percent of the time normally required for completion. Hours attempted/pursued includes all hours (courses) enrolled as of the close of late registration and in which a grade was awarded (including “W” withdrawals). To be eligible to receive financial assistance, students are required to complete their degree plan within the following time frames (number of enrollment hours pursued at other universities is included):

Associate Degree (Two Year Degree)	90 hours attempted / pursued
*Bachelor Degree (Four Year Degree)	180 hours attempted / pursued
**Master’s Degree	50 hours attempted / pursued
Teacher Certification	60 hours attempted / pursued
Education Specialist	50 hours attempted / pursued
2nd Associate Degree	135 hours attempted / pursued
2nd Bachelor Degree	270 hours attempted / pursued
2nd Master’s Degree	80 hours attempted / pursued

*Based on an average 120-hour bachelor degree plan.

**Based on an average 33-hour master’s degree plan.

Students with degree programs requiring more hours may appeal for extended periods of eligibility.

- Students who fail to complete their degree plan within the above limitations are ineligible to receive financial assistance, even if they did not receive financial aid each semester.

Appeal Procedures

Satisfactory academic progress will be checked after grades are posted at the end of the fall, spring, and summer semesters.

- 1. Regaining Eligibility** – Students can either submit an appeal to reinstate their eligibility for federal aid or pay on their own and achieve SAP standards listed in the above charts to become eligible for a future term.
- 2. Notification** – Students not in academic compliance will be notified after each semester. Satisfactory academic progress (SAP) information is emailed to the student after determination of compliance with each semester's standards.
- 3. Financial Aid Warning** – Students, except for transfers, will be put on financial aid warning after their first semester at Success University of not maintaining SAP. Students on SAP financial aid warning are eligible for financial aid. No appeal is necessary. After their second consecutive semester of NOT maintaining SAP, their financial aid will be terminated. Not attending one or more semesters will not affect or change your SAP status.
- 4. Mitigating Circumstances** – Students who have extenuating circumstances causing the overall cumulative grade point average and/or hours earned to fall below standard may appeal to their academic college. Examples of extenuating circumstances are prolonged illness under a doctor's care, illness or accidents requiring hospitalization or prolonged illness of a dependent, or death of an immediate family member.
- 5. Information to Include in Appeal** – Students should explain why SAP was not maintained and what has changed which will now allow SAP to be maintained at the end of the next term.
- 6. Submission Deadline** – Students must submit their appeal letter no later than two weeks prior to the appeal meeting. Appeal letter must be submitted electronically in the Self Service portal.
- 7. Results** – Each academic college will submit a decision to the Financial Aid Office. Once a decision has been finalized an email will be sent to students immediately through the automated process. The decision could be, Granted Financial Aid Probation, Academic Plan Approved, Academic Plan Approved-Change Major or Denied. If an appeal is denied, the student will not be eligible for federal aid until the student is again meeting SAP standards. If the student's extenuating circumstances change, then he or she has the right to appeal for a future semester that he or she wishes to receive federal aid. The Academic College's decision is final.

Application of Policy

Sharon is a freshman, and attempted 12 hours in her first semester at Success. She completed 6 hours with a cumulative grade point average of 1.22. Success University requires students to earn 9 hours and a 2.0 GPA to pass SAP, so Sharon fails SAP for this first term. Success financial aid staff put Sharon on financial aid warning for one term, and she is eligible for financial aid her second semester.

At the conclusion of her second semester, Sharon attempted another 12 hours, and improves her GPA, but her cumulative GPA is now a 1.56. Sharon fails SAP and is now ineligible for financial aid because she has already received a warning semester.

Sharon decides to appeal to her academic college. She submits a personal statement and documentation of her mother's illness and death to show why she was unable to meet SAP. After reviewing Sharon's appeal, the Appeal Committee knows that Sharon may not be able to reach SAP within one term. The Appeal Committee approves Sharon's appeal and places her on financial aid probation with the following requirements of an academic plan:

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

The Success financial aid office staff will need to monitor the academic plan at various checkpoints and that will (hopefully) ultimately restore Sharon's full non-probationary eligibility for financial aid.

Case Study Three – A Clock-Hour Example

Sample University Policy: Beauty School of America

Satisfactory Academic Progress Policy Cosmetology

All students attending Beauty School of America's (full time, 3/4 time and part-time) cosmetology program must maintain satisfactory academic progress as defined by the school in order to be eligible for Title IV assistance. NonTitle IV recipients will not be subject to loss of Title IV aid but are required to graduate within the maximum time frame and maintain satisfactory academic progress.

Cosmetology Program: 1000 Hours

Your Maximum Time Length: 1500 Hours

Your Academic Year: 900 Hours

Your Evaluation Periods: 450 and 900 Scheduled Hours

Students will receive notice of satisfactory academic progress by means of a Satisfactory Academic Progress Report.

Satisfactory academic progress is the qualitative and quantitative measure used by the school to determine the extent to which a student is making adequate progress towards the completion of the cosmetology program within the maximum time frame while maintaining a minimum academic standard.

Satisfactory academic progress contains two components:

1. Grades: Students must maintain an overall grade point average of a "70."
2. Attendance: Students must attend a minimum of 66.67 percent of their scheduled clock hours.

Evaluation Period: A student's academic and attendance progress are evaluated at the scheduled midpoint of the student's academic year. A student attending the full Cosmetology Program will have two scheduled evaluation periods. The evaluation periods will be at 450 and 900 scheduled hours for a student completing the 1000 hour program. Students will be considered to be making Satisfactory Academic Progress until the next evaluation period.

Scheduled Hours: Scheduled hours are the hours that are stated on the student's enrollment contract. For example if you enrolled for 30 hours per week your scheduled hours are 30 hours per week.

Maximum Time Frame: Students must complete their program within a maximum time frame of 150 percent of their 1000 hour program length. For example, for the 1000 hour cosmetology program, students must complete the program before reaching 1500 scheduled hours in order to graduate within the maximum time frame. Please keep in mind you still may be subject to a penalty fee or withdrawn for non attendance.

Attendance Progress: Students must have a minimum of a 66.67 percent overall attendance percentage in order to be considered to be achieving satisfactory academic progress and graduate within the maximum time frame. Students who do not have a minimum of 66.67 percent attendance percentage will be placed on financial aid warning for not achieving satisfactory academic progress. Attendance progress will be determined at 450 scheduled hours and 900 scheduled hours. Percentage of attendance will be determined as follows: percentage of actual hours vs. scheduled hours. For example a student is scheduled to attend 6 hours per day. At the conclusion of 2 weeks or 10 school days, the student was scheduled to attend 60 hours. The student had completed 58 hours. The student's attendance ratio is $58/60 = 97\%$ attendance ratio. Another way to explain this as follows:

1st Evaluation Period (=) 450 Scheduled Hours; the minimum hours = 300 ($300/450 = 66.67\%$)

2nd Evaluation Period (=) 900 Scheduled Hours; the minimum hours = 600 ($600/900 = 66.67\%$)

Note: The maximum time frame of 150 percent of scheduled hours includes up to 150 hours of excused absences. Students must be aware that if they go beyond their graduation date, as stated in their enrollment agreement, they may be subject to a penalty fee. A student may be achieving satisfactory academic progress and still have a penalty fee. Please keep in mind you still may be subject to a penalty fee or withdrawn.

Leave of Absence: An approved leave of absence will extend a student's enrollment contract scheduled graduation date by the same number of school days the student received the leave of absence.

Grades: A student must maintain a 70 grade point average in order to be considered to be maintaining satisfactory academic progress. This academic progress will be evaluated at 450 and 900 scheduled hours. Students who do not have a minimum of a 70 grade point average will be first placed on financial aid warning and then if they have are not maintained satisfactory academic progress they will fail SAP. Students who successfully appeal may be placed on financial aid probation for not achieving satisfactory progress. (Please see details on financial aid warning and financial aid probation). Students will receive a numeric grade in theory and practical work. An overall grade point average of a 70 is required for graduation. The following represents the equivalencies of the grades assigned. (For more information on grading please see Grading Procedures in Cosmetology Program Outline):

Excellent	100-90
Very Good	89-80
Good	79-70
Fair	69-60
Fail	59 and Below

Incompletes: Students who are absent for a scheduled practical or academic test or quiz will receive a 59. The student will have three weeks to make up the quiz and replace the 59 with the actual score.

Retaking Exams: Students are encouraged to retake tests or quizzes they do not feel reflect their knowledge and comprehension of the subject. Our goal is to be assured that the student has the knowledge to successful pass the state board exam. The highest grade will be the official grade. (This policy is considered to be a minimum and additional options may be offered at the discretion of the director.)

Extra Credit: Students are encouraged to do extra credit projects. Extra credit projects may be averaged in with the previous grade of the same subject.

Clinic/Student Salon Grades: Clinic/Student Salon grades are deliberately not included in the student's overall grade point average. Clinic/Student Salon work is considered to be a work in progress and students are encouraged to work towards the continuous improvement of the clinic service. Students must complete the required services and maintain a minimum of a 70 grade point average.

Financial Aid Warning

Students who are not achieving satisfactory academic progress will be first placed on financial aid warning. Financial aid warning status will be assigned without an appeal or other action by the student.

Students who do not meet the minimum requirements of a 70 grade point average and a 66.67 percent attendance ratio will be placed on financial aid warning. In order to be considered to re-establish satisfactory progress students must meet the minimum requirements of 66.67 percent attendance and 70 percent grade point average for the 450 scheduled hours period. This is not cumulative; however, students still must graduate within the 150 percent maximum time frame. At the conclusion of 900 scheduled hours, if the student continues not to be maintaining satisfactory academic progress, the student will no longer be eligible for aid.

*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 Probation

Students that are not achieving satisfactory academic progress at the end of the financial aid warning period will be no longer be eligible to receive financial aid. Student's have the right to appeal this decision. If the appeal is approved, the student is placed on financial aid probation.

Appeal Process: A student that has failed SAP may appeal the determination of satisfactory progress based on extenuating circumstances. The student must submit a written appeal to the director or designee. The appeal must include why the student failed to meet SAP, and what has changed that will allow the student to meet SAP in the future. The written appeal should be accompanied by documentation that would verify the extenuating circumstances, for example, the death of a relative, an injury or illness of the student, or other special circumstances and or what has changed in the student's situation that will allow the student to demonstrate satisfactory academic progress. The appeal will be reviewed and the student will be notified of the decision. If an appeal is granted, the student will be placed on financial aid probation, and will be eligible for aid.

Re-admission Policy: Students who are re-admitted enter in the same SAP status as when they left. Students who are expelled from school for failure to achieve satisfactory progress may be re-admitted at the discretion of the director. Re-entering students will be charged according to the statements in the student's Return and Extra Charge Form. Please note the Massachusetts State Board of Cosmetology determines the acceptable hours for students who re-enroll.

Transfer Hours: Transfer student hours, accepted of hours towards the cosmetology program from the Board of Cosmetology and Beauty School of America, will be counted as both attempted and completed for purposes of establishing satisfactory academic progress.

Course Incompletes, Repetitions, and Non-Credit Remedial Courses: Beauty School of America does not allow for course incompletes, repetition and non-remedial courses.

Application of Policy

Beauty School of America (BSA) offers a 900 clock-hour program in hair and make-up design. The school defines the Title IV academic year for the program as 900 clock hours completed over 30 weeks. The program consists of two payment periods; the first payment period is the amount of time it takes a student to complete the first 450 clock-hours and 15 weeks of the program; the second period is the amount of time it takes a student to complete the remaining clock hours and weeks in the program. BSA evaluates satisfactory academic progress for each payment period at the point at which the clock hours for the period have elapsed regardless of whether or not students have attended all the hours. To be making satisfactory academic progress, a student must maintain a grade point average of at least a 70 and a pace of 66.67 percent. The program's maximum time frame is 1,350 clock hours. Excused absences of up to 150 clock hours are counted towards attempted hours.

Since the school evaluates SAP each payment period, it utilizes the financial aid warning status for students who fail to meet standards. Students who are still not meeting SAP standards after a payment period on financial aid warning may submit an appeal; students may appeal the qualitative and quantitative (pace) standards. BSA does not allow students to appeal violations of the maximum time frame.

Fabio began the program in hair and make-up design in September. His enrollment contract specifies that he will complete 30 clock hours a week. If he progresses per his enrollment contract, he will finish his program in 30 weeks, at which time he plans to move to Hollywood and pursue a career in the film industry. After 15 weeks, BSA performs its first evaluation of Fabio's progress. Fabio's GPA is a 3.5, but he has only attended 250 of his scheduled clock hours.

Based on its evaluation of Fabio's SAP, BSA places Fabio on financial aid warning. It performs its next evaluation after another 15 weeks have elapsed. Fabio's GPA has dropped to a 3.0, but he has completed 750 of the clock hours needed to finish his program. He also has 100 clock hours of excused absences. Fabio is now meeting the SAP policy at BSA.

Case Study Four – Monitoring SAP for Graduate Students

Sample University Policy: National Graduate University

Standards of Satisfactory Academic Progress (SAP) for Graduate Students

To receive funds administered by the Financial Aid Office at National Graduate University (NGU), students must be making measurable academic progress toward completion of an eligible degree or certificate program. NOTE: With the exception of teaching certificates, there are no aid-eligible certificate programs offered at NGU. Federal regulations require evaluation of both quantitative and qualitative academic progress. Satisfactory academic progress (SAP) standards are the same for all categories of graduate students, including those students registered with Disability Services. Students registered with Disability Services should take advantage of suggested accommodations in order to meet the SAP standards. Failure to register with Disability Services will not be considered an extenuating circumstance.

All periods of enrollment will be included in the measurement of satisfactory academic progress. Terms in which the student enrolled but did not receive financial aid are included in the measurement. Students are notified by email to their official NGU accounts if they are not meeting satisfactory academic progress.

Guidelines for Academic Progress

The academic year at NGU consists of fall, spring, and summer enrollment periods. Fall begins the academic year and summer concludes it. The measurement of academic progress is made at the end of each enrollment period and the status is effective with the next enrollment period.

Students enrolling at NGU for the first time (including transfers) are considered initially to be meeting SAP. The measurement of academic progress will be made at the conclusion of the first enrollment term and will include all acceptable transfer credit that the NGU academic record contains. Students who have been academically suspended from NGU and who are re-admitted are not eligible for financial aid unless meeting the SAP standards. Students who are re-admitted may follow the appeal policy if consideration for financial aid is desired. Students may change majors but all attempted credit hours and all earned grades will be considered as part of the evaluation of academic progress for financial aid; not meeting SAP standards due to change of major may be considered as part of an appeal.

Qualitative Standards:

Students must meet a qualitative standard of academic progress measured through cumulative grade point average. Graduate students must have 2.75 overall GPA at the conclusion of each term.

Quantitative Standards:

Students must meet a quantitative standard of academic progress measured by a percentage completion rate. Students must successfully complete 80 percent of all attempted credit hours (this allows students to graduate within 125 percent of normal timeframe). The calculation is made as follows: earned credit hours divided by attempted credit hours = completion rate (result will be rounded to closest whole number). Courses with grades of "W," "I," "F," "IF," "NF," "NR," and courses taken under the NGU class repeat regulations are included in attempted credit hours but are not included in earned credit hours. Transfer work included on the NGU academic record is also included.

Maximum Time Frame for Degree Completion:

Students must graduate within 125 percent of the normal time frame for their program. The total number of credits required for degree completion will vary by program and by student's area of emphasis. The NGU catalog will provide initial information on the number of required credits for program completion but in instances where additional research hours are required, the student's academic advisor/department chair can indicate if the student is making satisfactory progress toward the degree objective. Students who are pursuing a course of study with greater credit hour requirements need to notify the Financial Aid Office in order to have a review done on a case-by-case basis. This request for review will not be considered an appeal.

Students who are pursuing second degrees may be considered for financial aid (this is not the same situation as dual degrees). The limitation on attempted hours for a second degree is measured from the point at which the student earned the initial degree. For graduate students who are pursuing a second master's degree, the student's advisor should provide a list of required coursework for the second degree and that will serve as a guide to the student's progress. Courses not required for the degree will not be included as eligible for aid.

Financial aid eligibility is limited to no more than two associate degrees, two undergraduate degrees, two master's degrees, and one doctorate. Students who wish to pursue additional degrees beyond these may do so but without federal financial assistance.

Financial Aid Warning:

A student who fails to meet SAP (excluding maximum time frame) at the end of an enrollment period will be automatically placed on "financial aid warning," not to exceed one enrollment period. During the "financial aid warning" enrollment period, the student may receive federal financial aid despite the determination that the student is not meeting SAP standards. The student must meet SAP standards at the end of the financial aid warning period or will be suspended from further financial aid until such time as the student meets SAP standards (student must pay for any additional course enrollment after the financial aid warning period through personal or private funds) or the student must appeal and have the appeal granted.

Financial Aid Probation:

"Financial aid probation" is the status assigned to a student who fails to meet SAP standards and who has appealed and had the appeal granted. A student on financial aid "probation" may receive financial aid for one enrollment period. At that point, the student must meet SAP standards. If the student was placed on an academic plan, the plan cannot exceed three terms and the student must continue to meet the terms of the plan—a review is conducted at the conclusion of each term – developed in conjunction with an academic advisor.

Appeal Process:

There may be extenuating circumstances encountered by a student which impact on his or her ability to be successful during an enrollment period. These circumstances include personal injury or illness which occurs during an enrollment period; death of an immediate family member or legal guardian during an enrollment period; or other documented circumstances that were unexpected in nature and beyond control of the student. In these cases, cumulative grade point average or completion rate may decline resulting in the student not meeting the minimum qualitative and quantitative standards previously described.

If this occurs and the student wishes to appeal the suspension from financial aid eligibility, a Satisfactory Academic Progress Appeal Form (which must include why the student failed to meet SAP, and what has changed in the student's situation to make SAP in the future) must be submitted to the Financial Aid Office no later than one week prior to the term in which the student seeks financial aid. Students will need to determine if the academic advising unit has established an earlier deadline for advisor contact. If the student is able to meet the SAP policy within one enrollment term, the advisor/official form needs to state the number of credit hours and semester GPA that a student must obtain in order to be compliant at the next assessment period. If the student will require more than one enrollment period to become compliant with SAP standards, an academic plan must be developed which specifies the course work and term GPAs necessary to become compliant within three enrollment periods. A review will be done at the end of each enrollment period to insure that the student is meeting the terms of the academic plan. If the student is not meeting those terms, further eligibility for aid is suspended immediately. An academic plan should not exceed three additional terms of enrollment.

In some cases, a student may not complete the degree objective within a reasonable time frame as a result of a change of major. If this occurs and the student wishes to appeal the suspension from financial aid eligibility, a Satisfactory Academic Progress Appeal Form must be submitted no later than one week prior to the first day of the enrollment term in which the student seeks financial aid. This appeal must include an academic plan which specifically identifies remaining required course work and the projected graduation date. Extensions of the maximum time frame will not exceed three additional enrollment periods. Extensions of the time frame will not be granted to students who have less than an overall 2.75 grade point average, less than an 80 percent completion rate, or who received academic forgiveness under the NGU Academic Forgiveness Policy.

An appeal form must contain a copy of the NGU academic transcript (unofficial copy is acceptable), appropriate documentation regarding the extenuating circumstance, and a signed NGU academic advisor/official form. Incomplete appeal forms will not be reviewed.

The appeal will be reviewed at the appropriate level as noted below:

- 1st level Financial Aid Appeals Committee (comprised of financial aid office representatives, at least one academic advisor, and chaired by a senior administrator within the office)
- 2nd level Financial Aid Appeal Review Committee (comprised of one financial aid representative, at least one academic advisor, and other NGU representatives as appointed by Chair of the Committee)
- 3rd level Office of NGU President or President's designee

Each level may be used only one time during the student's enrollment period at NGU and only one appeal will be considered each term. Evaluation and decision is made based upon the information provided in the student appeal and advisor forms. Levels 2 and 3 will be provided with all information submitted in previous appeals. Only at the request of the Level 1 or 2 committee or Office of President will a student appear in person. If a student is denied at the 3rd level, the student is no longer eligible for further financial aid from NGU until such time that the student becomes compliant with the Satisfactory Academic Progress Policy.

Application of Policy

Gloria is a student at NGU, and began her Master of Fine Arts in Theatre and Dance. Gloria earned 22 credit hours toward that degree, which requires 62 credit hours. She injured her hamstring, and decided to pursue her Master of Legal Studies instead. The Master of Legal Studies requires a total of 36 credit hours. Gloria proceeds in her program, and at the end of her spring term, she now has 48 total hours on her transcript. 22 of these hours are from her first program, and 26 of these hours are from her current degree program.

Because Gloria has exceeded 125 percent of her current degree program (45 credit hours), she fails SAP. Gloria immediately reaches out to the Financial Aid Office staff at NGU, and submits an appeal. In her appeal, she explains she has changed her major, and documents her hamstring injury. She specifically lists her remaining coursework, which includes 10 credit hours. She includes a letter from her advisor in the Legal Studies Program. The Appeals Committee reviews her documentation, and puts her on an academic plan which cannot exceed three additional enrollment periods per the policy.

GLOSSARY OF TERMS

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.

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.

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.

Maximum time frame: 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.

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.

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.

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 policy: An institution's policy for determining whether an otherwise eligible student is making satisfactory academic progress in his or her educational program in order to receive assistance under the title IV, HEA programs.

Transfer credit: Credit 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.

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.

(b) *Definitions.* The following definitions apply to the terms used in this section:

Appeal. Appeal means 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. Financial aid probation means 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. Financial aid warning means 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.

Maximum timeframe. Maximum timeframe means—

- (1) 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;
- (2) 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
- (3) For a graduate program, a period defined by the institution that is based on the length of the educational program.

(c) *Institutions that evaluate satisfactory academic progress at the end of each payment period.*

- (1) An institution that evaluates satisfactory academic progress at the end of each payment period and determines that a student is not making progress under its policy may nevertheless disburse title IV, HEA program funds to the student under the provisions of paragraph (c)(2), (c)(3), or (c)(4) of this section.
- (2) For the payment period following the payment period in which the student did not make satisfactory academic progress, the institution may—
 - (i) Place the student on financial aid warning, and disburse title IV, HEA program funds to the student; or
 - (ii) Place a student directly on financial aid probation, following the procedures outlined in paragraph (d)(2) of this section and disburse title IV, HEA program funds to the student.
- (3) For the payment period following a payment period during which a student was on financial aid warning, the institution may place the student on financial aid probation, and disburse title IV, HEA program funds to the student if—
 - (i) The institution evaluates the student's progress and determines that student did not make satisfactory academic progress during the payment period the student was on financial aid warning;
 - (ii) The student appeals the determination; and
 - (iii) (A) The institution determines that the student should be able to meet the institution's satisfactory academic progress standards by the end of the subsequent payment period; or
(B) The institution develops an academic plan for the student that, if followed, will ensure that the student is able to meet the institution's satisfactory academic progress standards by a specific point in time.
- (4) A student on financial aid probation for a payment period may not receive title IV, HEA program funds for the subsequent payment period unless the student makes satisfactory academic progress or the institution determines that the student met the requirements specified by the institution in the academic plan for the student.

(d) *Institutions that evaluate satisfactory academic progress annually or less frequently than at the end of each payment period.*

- (1) An institution that evaluates satisfactory academic progress annually or less frequently than at the end of each payment period and determines that a student is not making progress under its policy may nevertheless disburse title IV, HEA program funds to the student under the provisions of paragraph (d)(2) or (d)(3) of this section.
- (2) The institution may place the student on financial aid probation and may disburse title IV, HEA program funds to the student for the subsequent payment period if—
 - (i) The institution evaluates the student and determines that the student is not making satisfactory academic progress;
 - (ii) The student appeals the determination; and
 - (iii) (A) The institution determines that the student should be able to be make satisfactory academic progress during the subsequent payment period and meet the institution’s satisfactory academic progress standards at the end of that payment period; or
(B) The institution develops an academic plan for the student that, if followed, will ensure that the student is able to meet the institution’s satisfactory academic progress standards by a specific point in time.
- (3) A student on financial aid probation for a payment period may not receive title IV, HEA program funds for the subsequent payment period unless the student makes satisfactory academic progress or the institution determines that the student met the requirements specified by the institution in the academic plan for the student.

Resources

Higher Education Act (HEA) of 1965, as amended, Section 484(c).

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

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