Monitoring Satisfactory Academic Progress

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Federal Student Aid

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Satisfactory Academic Progress

• SAP regulations consolidated into 34 CFR 668.34
  – Administrative capability 668.16 now only refers to policy
  – Student eligibility in 668.32 still includes as eligibility requirement
  – Satisfactory progress in 668.34 now contains all elements of SAP

• New, but have been in effect since July 1, 2011
Satisfactory Academic Progress

• Consolidates SAP regulations into 34 CFR 668.34
• 34 CFR 668.34 is easier to understand if you break it down into 3 portions:
  • First, Section (a)
  • Next, Section (b)
  • Finally, Section (c) OR (d)
    -Not both sections-
Why Break it Down Into 3 Sections?

- Section (a) explains what you must do and what your policy must contain to be considered reasonable.
- Section (b) defines important terms used in assessing SAP.
- Section (c) OR (d) will apply to you and shows when and how you must assess SAP depending on if you assess SAP once a year OR once every payment period.
Satisfactory Academic Progress

- SAP is a Title IV requirement for student eligibility
- A student who is not making SAP is no longer eligible for Title IV aid
- As is the case in many Title IV rules, there ARE exceptions
SAP Policy

SAP policy required elements include

- Measurement of student’s progress at each evaluation
  - GPA that a student must achieve at each evaluation
    - Qualitative standard
  - Pace of progression to ensure completion within the maximum time frame
    - Quantitative standard
SAP Policy

• SAP policy required elements include
  • How GPA and pace of completion affected by
    o Incompletes
    o Withdrawals
    o Repetitions
    o Transfers of credit from other schools
      – At a minimum, school must count transfer hours, accepted toward completion of student’s program, as both hours attempted and hours completed
SAP – Qualitative Element

• HEA Requirement that student must have 2.0 on a 4.0 scale, or its equivalent, after two years
  • For programs greater than two academic years
• End of second academic year
  • Regardless of how many credits earned or grade level
SAP – Quantitative Element

• Quantitative element has two components
  • Maximum timeframe
    o Period of time that student has to complete the program of study and still be making SAP
  • Pace of Progression
    o An ongoing measure that ensures student is on track to complete program in the maximum timeframe
Maximum Time Frame

- For undergraduate programs of study, must be no longer than 150% of published length of educational program
  - For credit hour programs, as measured in credit hours attempted
    - More precisely defined than in the past
  - For clock hour programs, as measured in cumulative clock hours required to complete and expressed in calendar time
Change of Major

• Still in place is the longstanding policy that schools may set their own SAP policy dealing with changes of major as they relate to maximum time frame

• SAP policy may limit the number of times that a student may change majors and have the maximum time frame recalculated
Pace of Progression

- School’s policy must specify
  - Pace of progression required to ensure student completes within maximum time frame and that pace is measured at each evaluation
  - Pace calculated by dividing cumulative hours student successfully completed by cumulative hours student has attempted
    - Remedial coursework may be excluded
How Often Is SAP Evaluated?

- For programs of study that are one academic year or less in length, school must evaluate SAP at end of each payment period
- For programs of study longer than one academic year
  - School must evaluate at least annually to correspond with end of a payment period
  - School may evaluate at end of each payment period
Definitions

- Financial Aid Warning
- Financial Aid Probation
- Appeal
- Academic Plan
- All defined for Title IV purposes NOT academic purposes
School Options

• F/A Warning status may be used by schools that measure at end of each payment period
• F/A Probation status may be used by schools who have an appeal process
• Academic Plan is a tool that schools with an appeal process may choose to implement
• Appeal process may be used by schools, if they wish
School Options

- Financial Aid Warning
- Financial Aid Probation
- Academic Plan
- Appeal
- School may choose to implement one, several, all or none of these options
SAP - Warning

• Financial Aid Warning
  • You cannot use this status unless you evaluate SAP at the end of each payment period
  • School may establish when it is used in policy
  • Status assigned to a student who fails to make SAP
  • No appeal necessary for this status
  • Student is not making SAP while in this status
  • Student may continue to receive Title IV aid for one payment period
SAP - Probation

• Financial Aid Probation
  • Status assigned by an institution to a student who fails to make SAP and who has successfully appealed and has had eligibility for Title IV aid reinstated (i.e. appeal approved)
  • Institution may impose conditions for student’s continued eligibility to receive Title IV aid
  • Student is not making SAP in this status
  • Student may receive T4 aid in this status for one payment period
SAP - Probation

- While student is on financial aid probation, status must be checked each payment period even if non-probationary students are checked less frequently.

- If it appears that student can return to SAP status after one payment period, school may choose to implement an academic plan or not.
SAP - Probation

• If it appears that student will take multiple payment periods to reach the status of SAP, the school may implement an academic plan immediately

• The first payment period under the academic plan is probationary

• Subsequent payment periods under the academic plan are not probationary and the student is making SAP under the provisions of the academic plan

• Conversely, if the student is not meeting the provisions of the academic plan, he or she is not making SAP and is, therefore, ineligible for T4
• FA Probation always follows a successful appeal

• The probationary period granted as a result of the appeal is limited to one payment period
SAP - Appeal

• Process by which a student who is not meeting institution’s SAP policy petitions for reconsideration of eligibility for Title IV aid, due to unusual circumstances
  – Appeal policy must specify the conditions under which a student may appeal
  – Student’s appeal must include
    – Why he or she failed to make SAP
    AND
    – What has changed that will allow student to make SAP in the future
If School Decides to Grant the Appeal

Two things can happen

• School has determined that the student
  • Will be able to make SAP standards by end of next payment period and decides to put the student into probation with no academic plan
    – This is the probationary payment period
    – Probation may still have requirements
  OR
  • Will be placed on academic plan (AP) that will ensure student is able to meet SAP standards by a specific point in time in the future
    – The first payment period of the AP is the probationary payment period
Academic Plan

• AP must have a point in time identified when student will be making SAP as defined by the School’s SAP Policy
  • This cannot be 20 years down the road but it could be beyond the maximum timeframe if the school wishes and allows in its policy
  • Point in time may be the successful conclusion of the program of study
Academic Plan

• The AP is that student’s SAP policy
• If student fails to meet the requirements of the Academic Plan, the student is not making SAP
• Not making SAP = Loss of Title IV eligibility
Probation Then an AP

• School granted appeal and determined the student could be back on track in one payment period
  • Placed student into probation, no AP

• End of probation, student is still not making SAP
  • Student is ineligible
  • Cannot be placed automatically on AP
  • Student could appeal again…
Probation Then an AP

- This is the student’s second appeal
- School must review information stating
  - Why the student failed to make SAP at the end of the probation payment period
  - What had changed that caused the student to not make SAP during the probationary payment period
  - Why the student will be able to meet SAP under the terms of the academic plan
- If appeal is granted in this situation
  - Student goes immediately on AP, but the first payment period will still be considered probationary
  - Not second probation but the first associated with this appeal
Summary

• Let’s summarize what happens depending on whether…
  • The school checks SAP at the end of each payment period
  OR
  • The school checks SAP less frequently
    ◦ e.g. once a year
Evaluate Each Payment Period

• At an institution that evaluates SAP each payment period, if student loses eligibility for Title IV aid
  • Student may be placed on Financial Aid Warning for one payment period
  • After the warning period, if student is not making SAP, the student may be allowed to appeal the loss of Title IV eligibility
Evaluate Each Payment Period

• At an institution that evaluates SAP each payment period, if student loses eligibility for Title IV aid (cont’d)

• If the appeal is successful, the student may be
  • placed on Financial Aid Probation for one payment period
  OR
  • placed immediately on an academic plan and the first payment period will be probationary
Evaluate Each Payment Period

• At an institution that evaluates SAP each payment period, if student loses eligibility for Title IV aid (cont’d)

• After Financial Aid Probation, if the student was not placed on an academic plan
  • Student must be making SAP
    OR
  • Student must successfully appeal again in order to be placed on an academic plan
    – The first payment period of the AP would be probationary
    OR
  • Student loses Title IV eligibility
Does Not Evaluate Each Payment Period

- At an institution that evaluates SAP less often than each payment period, if a student loses eligibility for Title IV aid:
  - School cannot use the automatic F/A Warning status.
  - Student, after a successful appeal, may be:
    - Placed on Financial Aid Probation for one payment period OR
    - Placed immediately on an academic plan with the first payment period being probationary.
Does Not Evaluate Each Payment Period

- At an institution that evaluates SAP **less often than each payment period**, if a student loses eligibility for Title IV aid
  - After Financial Aid Probation, if the student was not placed on an academic plan
    - student must be making SAP
  OR
  - Student must successfully appeal again in order to be placed on an academic plan, and the first payment period will be probationary
  OR
  - Student loses Title IV eligibility
If School Implements All Options

• School exercises its option to evaluate SAP at the end of every payment period
• School chooses to have a warning status
• School chooses to have an appeal process
• School chooses to have a probationary status
• School chooses to use an academic plan
School grants appeal & believes student will be making SAP in 1 payment period

School does not grant appeal

School grants appeal but believes student will not be making SAP in 1 payment period

Probation

No Title IV

Acad. Plan
PROBATION & NOT PLACED ON AN ACADEMIC PLAN

NOT MAKING SAP
School does not grant appeal

No Title IV

School grants appeal

Probation

Acad. Plan
No Lifetime Limitation on SAP Statuses

• One warning payment period means not two consecutive warning payment periods
• May be multiple warning payment periods throughout student’s academic career
No Lifetime Limitation on SAP Statuses

• One probation payment period means not two consecutive probation payment periods linked to the same appeal
• May be multiple probation payment periods throughout student’s academic career
No Limitation on SAP Statuses

- School may allow one appeal or multiple appeals or NO appeals
- School may craft academic plan as it sees fit
  - May choose to limit the # or not
  - Student should take ownership of the academic plan and understand its requirements
SAP - Notifications

- Required SAP notifications
  - Institution must notify student of results of SAP review that impacts the student’s eligibility for Title IV aid
  - Institution must describe how a student who has failed SAP reestablishes eligibility for Title IV aid
  - If the institution has an appeal process, must describe the specific elements required to appeal the loss of Title IV eligibility due to a lack of SAP
ED presentations will be available at www.lasfaa.org
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Thank You, LASFAA!
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