



# SAP Chat

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## Agenda

- Compliance concerns
- Satisfactory Academic Progress (SAP) policy requirements
- SAP evaluation process



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## Common SAP Issues

- Failure to comply with the Program Integrity regulations effective July 1, 2011
- Failure to properly monitor and/or to document satisfactory progress



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### Common SAP Issues

- Failure to develop a *policy* that meets minimum Title IV requirements
- Misalignment of *pace of progression* and *Maximum Time Frame (MTF)*
- Applying a different *policy* than the official written SAP *policy*

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### SAP Policy Requirements




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### SAP Policy

- Schools must have reasonable standards for measuring a student's satisfactory academic progress toward a degree or certificate
- A reasonable standard is in accordance with *CFR 668.34*

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### Requirement Changes: July 1, 2011

- Requirements implemented with final regulations  
*(Federal Register: October 29, 2010)*
  - Specific GPA requirement
  - Treatment of transfer credits
  - Requirement to monitor progress each payment period, with new options
    - Financial Aid Warning definition
    - Financial Aid Probation definition
  - Academic plans

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### Reasonable Standard

*A reasonable SAP standard...*

- Is at least as strict as policy for non-Title IV recipients
- Provides consistent application to all students within categories of students
  - Full-time or part-time
  - Undergraduate or graduate students
- Monitors progress at least annually
- Establishes a Maximum Time Frame

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### SAP Components

- Qualitative component
  - Usually evaluated based on grade point average (GPA)
- Quantitative component
  - Measured by pace of completion

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### Policy Requirements

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- Policy must describe how student's GPA and pace of completion are affected by:
  - Incompletes
  - Withdrawals
  - Repeat coursework
  - Transfer of credit from other institutions
  - Changes of major
- Accepted transfer credits count as both attempted and completed hours

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### Policy Requirements

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- Must specify that if a student is not meeting SAP standards, s/he is ineligible to receive Title IV aid
- Warning and Probation statuses must be described if included in school's policy
- Students must be notified of SAP review determinations that impact their Title IV eligibility

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### Policy Requirements

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- If institution has appeal process, must describe the specific elements required to appeal SAP
  - May specify how often and how many appeals are allowed
- If no appeal process, description of how student may re-establish eligibility for Title IV aid

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### Discuss Amongst Yourselves

- Will you have fixed or graduated standards?
- How will you treat course incompletes, withdrawals and repetitions?
- How will you treat transfer credits?
- How will you treat remedial courses?
- How will you treat changes of major or program?

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### Discuss Amongst Yourselves

- Will your policy permit appeals?
  - Will the number of appeals be limited?
  - Which criteria can be appealed?
- Who will review appeals?
- Will your policy permit Academic Plans?
- Who will develop, approve and monitor compliance with Academic Plans?

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**SAP  
Evaluation  
Process**




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### Evaluation Basics

- Each official evaluation must include evaluation of GPA and pace
- Evaluations must be at end of payment period no matter how often progress is monitored
- "Warning" and "Probation" must have the same definitions as described in regulation
  - Warning and Probation statuses may last for only one payment period

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### Evaluation Points: Clock Hours

*Schools may monitor progress by selecting 1 of 3 options for all students in a program:*

1. At the point where the student's scheduled clock hours for the payment period have elapsed
2. At the point when the student has attended the scheduled clock hours
3. At the point when the student successfully completes the scheduled clock hours for that payment period

*Program Integrity: SAP Q&A R-Q7*

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### GPA Requirement

- Specify GPA required at each evaluation point
- If GPA is not an appropriate measurement, standard must be a comparable assessment measured against a norm
- For programs longer than two academic years, "C" average or equivalent required at end of second year, or academic standing consistent with the institution's requirements for graduation

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### Pace Requirement

- Replaces quantitative component
- Policy specifies the pace at which a student must complete in order to complete within maximum time to complete
- Pace calculation specified in regulation:

$$\frac{\text{Cumulative hours completed}}{\text{Cumulative hours attempted}}$$

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### Maximum Time Frame (MTF)

- For undergraduate programs, must be no longer than 150% of published length of the program
  - For credit hour programs, measured in credit hours attempted
  - For clock hour programs, measured in cumulative clock hours required to complete, expressed in calendar time
- For gradate programs, school defines the MTF based upon length of program

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### Maximum Time Frame and Pace

*The Maximum Time Frame is used to determine the pace of completion required to ensure that a student completes the program within the Maximum Time Frame*

- $\frac{100\% \text{ - Scheduled Length}}{150\% \text{ - Maximum Time}}$  = 67% Pace Requirement
- $\frac{100\% \text{ - Scheduled Length}}{118\% \text{ - Maximum Time}}$  = 85% Pace Requirement
- $\frac{100\% \text{ Scheduled Length}}{85\% \text{ - Pace Requirement}}$  = 118% Maximum Time

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### MTF Example: Credit Hours

- Bachelor's degree program requires 120 credits
- Maximum Time Frame =  $150\% \times 120 = 180$  credits
- Pace calculation
  - $120/180 = 67\%$
  - Student earning 67% of cumulative credits attempted is on track to complete the program within the MTF
  - Applicable at any enrollment status

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### MTF Example: Clock Hours

- Program is 1,200 clock hours
- Students attend 30 hours per week
- Program scheduled to last 40 weeks
- $40 \times 150\% = 60$  weeks Maximum Time Frame
  - A student must complete 20 hours per week in order to complete 1,200 hours in 60 weeks

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### Clock Hour Pace Review: Option 1

- School reviews SAP based on *scheduled* hours
- Students scheduled to attend 30 hours per week
- At 450 scheduled hours the student has successfully completed 300 hours
- Both hours and weeks must be checked
  - Hours calculation:  $300/450 = 67\%$
  - Weeks calculation:  $10/15 = 67\%$

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### Clock Hour Pace Review: Option 2

- School reviews SAP based on *attended* hours
- Students scheduled to attend 30 hours per week
- The student attended 450 hours at the time 600 hours were scheduled
- Both hours and weeks must be checked
  - Hours calculation:  $450/600 = 75\%$
  - Weeks calculation:  $15/20 = 75\%$

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### Clock Hour Pace Review: Option 3

- School reviews based on *successfully completed* hours
- Students scheduled to attend 30 hours per week
- The student successfully completed 380 hours at the time 600 hours were scheduled
- Both hours and weeks must be checked
  - Hours calculation:  $380/600 = 63\%$
  - Weeks calculation:  $15/20 = 75\%$

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### Timing Is Everything

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### SAP Frequency

- Frequency of evaluation determines options
- School must evaluate SAP at end of each payment period for programs of study that are one academic year or shorter in length
- For programs 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

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### Evaluations by Payment Period

*If a student is not in compliance with SAP standards...*

- Financial Aid Warning
- Financial Aid Probation
  - Requires student appeal
  - Academic Plan
- Warning and Probation statuses are optional, as is use of Academic Plan

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### Financial Aid Warning

- Status only available at schools that monitor progress at the end of each payment period
- Student may receive Title IV aid for *one* additional payment period
- Status may be assigned without student action or appeal

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### Financial Aid Warning

*After the Warning period...*

- Student meets SAP standards and regains eligibility
- Student does not meet SAP standards
  - Student successfully appeals and is placed on Probation or an Academic Plan
  - Student does not appeal, or appeal is denied, and school explains how student can regain eligibility

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### Annual Evaluations

- Financial Aid Warning status not available
- Probation requirements same as schools that evaluate at each payment period
- Student not making progress is not eligible for further Title IV assistance unless student successfully appeals

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### SAP Appeal

- Process by which a student who is not meeting SAP standards appeals for reconsideration of for Title IV eligibility
  - Policy must describe conditions under which a student may file an appeal
  - Appeal must include information from student as to why failed to make SAP, and what has changed that will allow the student to make SAP at next evaluation point
- Appeal process is optional and can be limited

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### SAP Appeal Approval

- School determines that student will be able to make SAP by end of next payment period

OR

- Student is placed on an Academic Plan that will ensure the student is able to meet SAP standards by a *specific point in time*
  - If placed on a Plan at this point, the first term on the Plan is a Probationary term

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### Financial Aid Probation

- Status available for a student not making progress who has appealed and had aid eligibility reinstated
- Student may receive aid for one additional payment period
- School may require student action while on Probation
- Possible use of Academic Plan
- Student must be evaluated at the end of the Probation term even if the school normally evaluates less frequently

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### Financial Aid Probation

*After the Probation period...*

- Student meets SAP standards and regains aid eligibility
- Student does not meet standards
  - Student successfully appeals and is placed on an Academic Plan
  - Student does not appeal, or appeal is denied and school explains how student can regain eligibility

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### Academic Plan

- Alternative to Probation available to all schools
- If followed, specifies a point in time at which the student will be able to meet SAP standards
- Student on plan is evaluated against the plan requirements, not regular SAP standards

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### Resources

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### SAP Resources

- *FSA Assessments*  
- <http://www.ifap.ed.gov/qahome/qassessments/sap.html>
- *Program Integrity Q&A: SAP*  
- <http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/sap.html>
- *Federal Student Aid Handbook, Volume 1*

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**Thank you!**

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### **We Appreciate Your Feedback**

To ensure quality training we ask all participants to please fill out an online session evaluation:

<https://www.surveymonkey.com/s/ZacharyGoodwin>

This evaluation tool provides a means to inform us of areas for improvement, and to support an effective process for listening to our customers.

Additional feedback about training can be directed to [Joann.Borel@ed.gov](mailto:Joann.Borel@ed.gov).



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### **Department of Education Contacts**

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### Department of Education Contacts

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