

# UNDERSTANDING YOUR SATISFACTORY ACADEMIC PROGRESS POLICY



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WyASFAA 2022 Conference

# AGENDA

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1. SAP Policy Basics
2. SAP Policy Components
3. Other Key SAP Policy Elements
4. When to Check SAP
5. Financial Aid Warning, Appeals & Probation
6. Resources & References
7. Additional SAP Policy Guidance (Take-home Q&A Scenarios)

# SAP COMPLIANCE CONCERNS

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- ❑ Failure to properly monitor and/or document satisfactory progress
- ❑ Failure to develop policy that meets minimum Title IV requirements
- ❑ Applying different policy than official written SAP policy
- ❑ Misaligning pace of progression and maximum timeframe
- ❑ Incorrectly approved or inadequately supported student appeals

# SAP POLICY BASICS



# SATISFACTORY ACADEMIC PROGRESS (SAP)



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, *Higher Education Act of 1965* (HEA) programs.

**34 CFR § 668.34(a)**

# SAP POLICY BASICS

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- Reasonable
- Consistently applied
- Apply to all Title IV programs
  - If not meeting SAP, not eligible for any Title IV program
- “ED provides outline; schools fill in details”
  - Schools have a lot of flexibility

# SAP POLICY BASICS

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- SAP policy must be *as strict as* policy for students not receiving Title IV aid
- “*As strict as*”
  - Refers to qualitative, quantitative, maximum timeframe standards
  - Does *not* refer to frequency of SAP checks
    - Example: Academics may check SAP *every* term, but financial aid checks annually

# SAP POLICY BASICS

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- May establish different SAP standards/policies for different categories of students
  - Full-time vs. part-time students
  - Undergraduate vs. graduate students
  - Different programs of study
  - Does *not* apply to subsets of students (e.g., veterans, athletes, women, etc.)
- Any SAP policy must contain all required elements and be applied consistently to students in that category

See: [Program Integrity Q&A SAP-Q9](#)



# SAP POLICY BASICS

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- School must notify students about
  - Results of any SAP review that impacts eligibility for Title IV aid
  - Specific elements required to appeal SAP-- if permitted
    - May specify how often and how many appeals are allowed
  - How to reestablish eligibility for Title IV aid after failing SAP (even if no appeal policy)

*Note: No regulatory requirement for school to notify non-TIV students of their eligibility for Title IV aid*

# SAP POLICY COMPONENTS



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- At each formal SAP evaluation point, schools check:
  1. Maximum timeframe
  2. Quantitative measure (pace of progression)
    - Not *required* for clock hour, nonterm credit hour, subscription-based programs
  3. Qualitative measure (grade-based)

An hourglass is the central focus, with sand falling from the top bulb into the bottom bulb. The background is a warm, golden-brown color with a bokeh effect, featuring out-of-focus light spots and dark, textured elements that resemble branches or leaves. The overall mood is contemplative and timeless.

# MAXIMUM TIMEFRAME

# MAXIMUM TIMEFRAME (MTF)

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- Maximum time student can receive Title IV aid to complete program of study

## Undergraduate Programs

No more than 150% of  
published program length

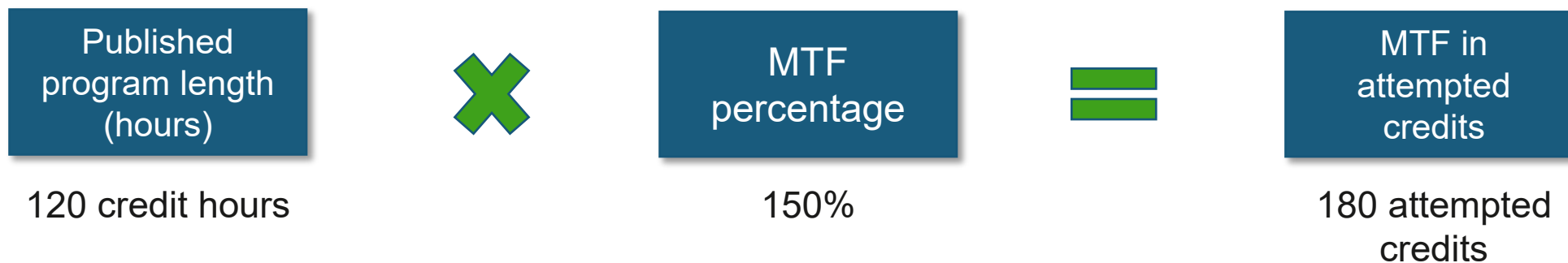
## Graduate Programs

School defines MTF

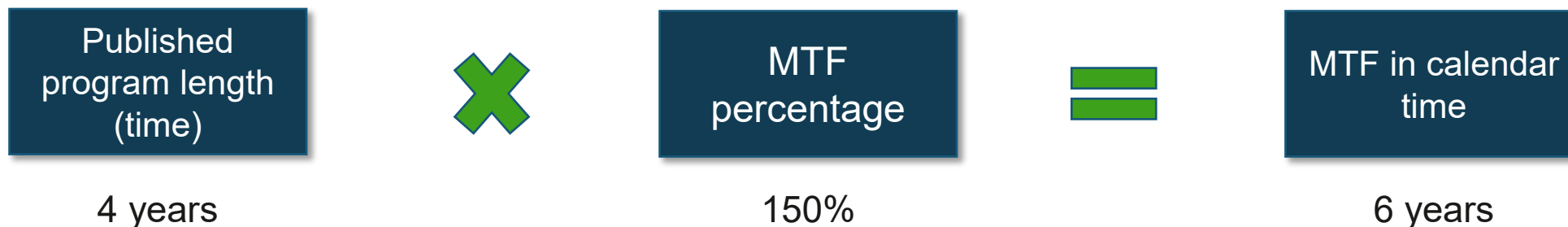
- Student ineligible *once indicated* will exceed MTF, *not* just at point when reach MTF
- Credit hour programs may express MTF in *credit hours* or *calendar time*

# MAXIMUM TIMEFRAME (MTF)

## Credit hour programs

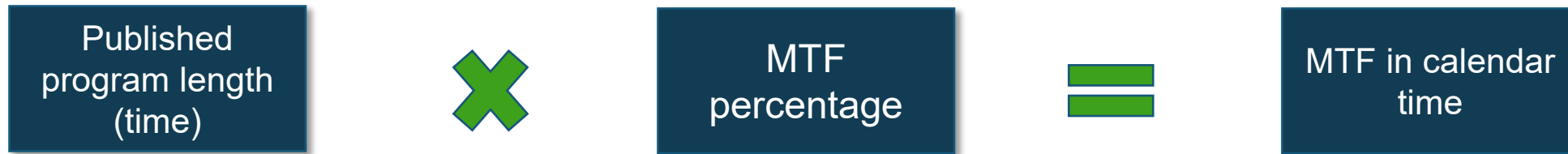


OR



# MAXIMUM TIMEFRAME (MTF)

## Credit hour programs (calendar time MTF)



- Method does not account for individual changes in enrollment status
- School's policy must address
  - Effect of *not attending* payment period(s)
  - How transfer credits affect calendar time for MTF

# MAXIMUM TIMEFRAME (MTF)

## Example:

Bob is enrolled in a 120-credit hour communications program. MTF is 180 hours attempted hours.

At SAP checkpoint Bob has attempted **160** credit hours but has **25** more credit hours to earn to complete his degree.

Bob is *not* meeting SAP. He has more hours to earn than can be completed within MTF ( $160 + 25 = \mathbf{185} > 180$ ).





# QUANTITATIVE MEASURE (PACE)

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# QUANTITATIVE MEASURE (PACE)

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Measure of progress toward program completion expressed as percentage

- Must be cumulative
- May round (standard rules apply)
- May use graduated or fixed standard
- Can be more restrictive
  - May require *cumulative* pace and *semester* pace requirements



# MAXIMUM TIMEFRAME (MTF) AND PACE

- Must align MTF and pace to ensure students complete program within MTF
- If use graduated pace, final pace (all graduated paces) must align with final MTF

100% - Scheduled Length  
150% - Maximum Time

**= 67% Pace Requirement**

100% - Scheduled Length  
118% - Maximum Time

**= 85% Pace Requirement**

100% - Scheduled Length  
85% - Pace Requirement

**= 118% Maximum Time**

# QUANTITATIVE MEASURE (PACE)

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## REQUIRED

Credit Hour Programs

- Standard term
- Non-standard term



## NOT REQUIRED

- Clock hour programs
- Nonterm credit hour programs
- Subscription-based programs

# QUANTITATIVE MEASURE (PACE)

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## Pace evaluation not required for clock hour, nonterm credit hour

- Students must successfully complete weeks and hours in payment period to receive subsequent disbursement
- School must still determine, at each SAP evaluation, if *mathematically possible* for student to complete program within MTF



# QUANTITATIVE MEASURE (PACE)

Determining pace for **credit hour** programs

Cumulative hours completed



Cumulative hours attempted

OR

Hours completed *compared with*  
hours student should have  
completed at evaluation point in  
order to finish program within  
MTF (calendar time)





# QUANTITATIVE MEASURE (PACE)

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## Credit hour example:

Jill is enrolled in standard term, undergraduate computer science program at Gilbert University (GU). GU checks SAP each payment period (PP). MTF is 150%. Pace requirement is 67%.

At end of 2<sup>nd</sup> semester Jill has completed 16 cumulative credits out of 24 attempted credits.

- $16 \text{ completed} / 24 \text{ attempted} = 67\% \text{ pace}$



# PACE IN CALENDAR TIME

## Credit hour example:

Adam enrolls in Mystery Seas University's (MSU) 4-year, 120 credit hour Marine Biology program. MSU checks SAP *annually* and MTF is 150%.

- 4 years x 150% = 6-year MTF
- 120 credits / 6 years = 20 credits

Adam must complete a minimum of 20 credits/ year to finish within MTF.

MTF Year	Minimum Credits to Complete
Year 1	20 credits (cumulative)
Year 2	40 credits (cumulative)
Year 3	60 credits (cumulative)
Year 4	80 credits (cumulative)
Year 5	100 credits (cumulative)
Year 6	120 credits (cumulative)



# PACE IN CALENDAR TIME

## Credit hour example:

Adam stops attending for an entire academic year after Year 1. MSU's policy is to *exclude* periods of non-attendance from MTF calculations. When Adam returns, MTF resumes at Year 2.

MTF Year	Minimum Credits to Complete
Year 1	20 credits (cumulative)
<del>Year 2</del>	<del>40 credits (cumulative)</del>
Year 2	40 credits (cumulative)
Year 3	60 credits (cumulative)
Year 4	80 credits (cumulative)
Year 5	100 credits (cumulative)
Year 6	120 credits (cumulative)

# PACE IN CALENDAR TIME

## Credit hour example:

What if MSU's policy were to *include* periods of non-attendance in MTF calculations? When Adam returns, MTF would resume at Year 3 with adjustments to minimum cumulative hours to complete

MTF Year	Minimum Credits to Complete
Year 1	20 credits (cumulative)
<del>Year 2</del>	<del>40 credits (cumulative)</del>
Year 3	45 credits (cumulative)
Year 4	70 credits (cumulative)
Year 5	95 credits (cumulative)
Year 6	120 credits (cumulative)

# MTF AND PACE (CALENDAR TIME)

## Credit Hour Example:

GU offers 2-year, 60 credit hour program in Accounting Basics. GU's academic year is Fall/Spring with *optional* summer term. GU checks SAP ***each payment period***. MTF is 150%.

- 2 years x 150% = 3-year MTF
- 60 credits/ 3 years = 20 credits min. completed per year to finish within MTF

MTF PP	Minimum Credits to Complete
1 <sup>st</sup> PP	10 credits (cumulative)
2 <sup>nd</sup> PP	20 credits (cumulative)
Summer PP1 (optional)	<b>20 credits (cumulative)</b>
3 <sup>rd</sup> PP	30 credits (cumulative)
4 <sup>th</sup> PP	40 credits (cumulative)
Summer PP2 (optional)	<b>40 credits (cumulative)</b>
5 <sup>th</sup> PP	50 credits (cumulative)
6 <sup>th</sup> PP	60 credits (cumulative)
Summer PP3 (optional)	<b>60 credits (cumulative)</b>

# MTF AND PACE (CALENDAR TIME)

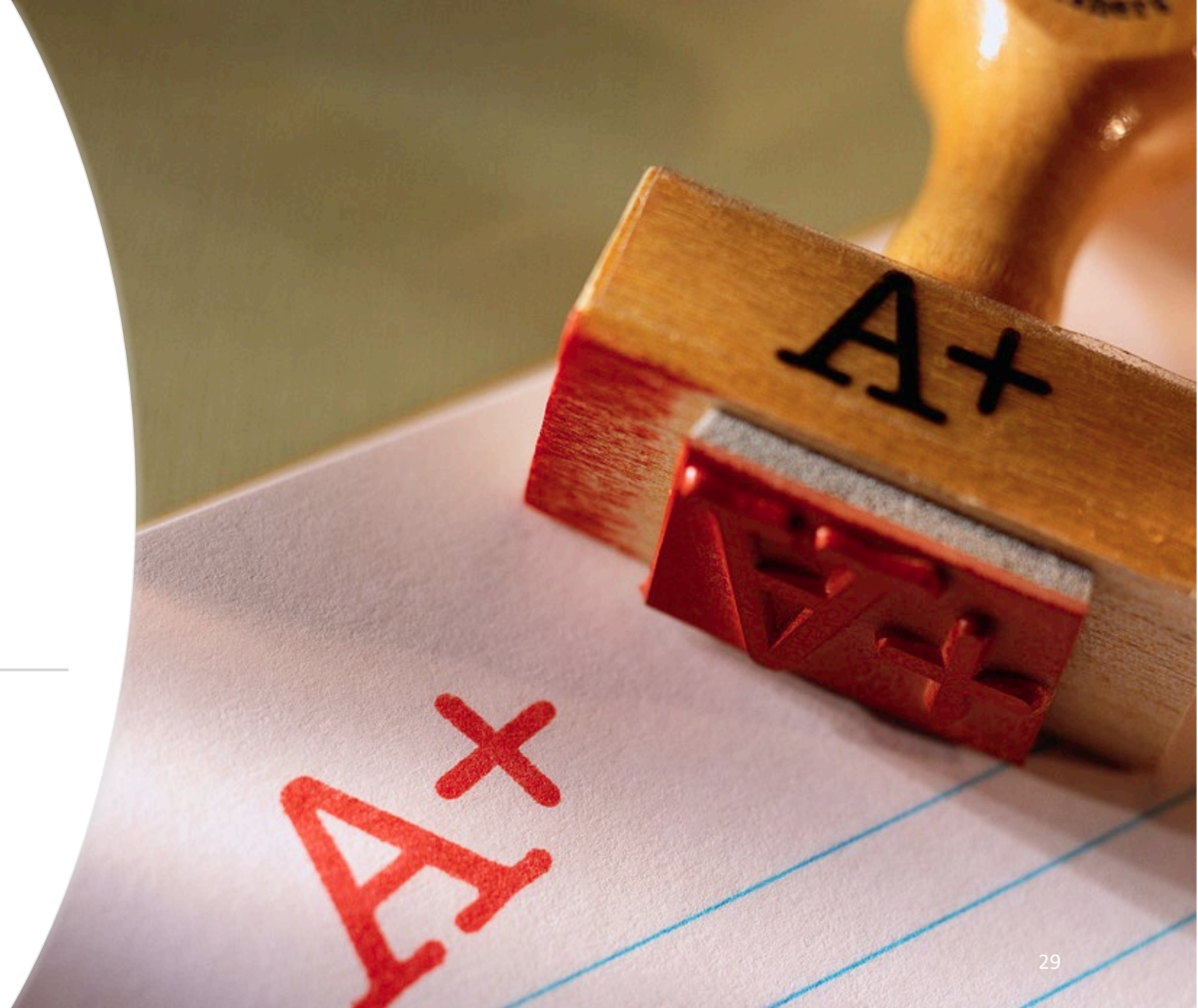
## Example:

What if GU's academic year were Fall/Spring with a *mandatory* Summer term?

Academic Year	MTF PP	Minimum Credits to Complete
AY 1	1 <sup>st</sup> PP	7 credits (cumulative)
	2 <sup>nd</sup> PP	14 credits (cumulative)
	3 <sup>rd</sup> PP Summer	20 credits (cumulative)
AY 2	4 <sup>th</sup> PP	27 credits (cumulative)
	5 <sup>th</sup> PP	34 credits (cumulative)
	6 <sup>th</sup> PP Summer	40 credits (cumulative)
AY 3	7 <sup>th</sup> PP	47 credits (cumulative)
	8 <sup>th</sup> PP	54 credits (cumulative)
	9 <sup>th</sup> PP Summer	60 credits (cumulative)

# QUALITATIVE MEASURE

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# QUALITATIVE MEASURE

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Evaluate quality of academic work against standard measurable norm (e.g., grades, work projects, etc.)

- Must be cumulative
- May use graduated or fixed standard
- May be more restrictive
  - School could require *cumulative* program or school 2.0 GPA and *payment period* 2.0 GPA

# QUALITATIVE MEASURE - REMEDIAL

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- Must evaluate remedial coursework under qualitative measurement
  - May incorporate into regular school GPA; or
  - May evaluate another way
    - Passing courses, meeting course requirements, separate GPA, etc.
- May include remedial coursework in MTF and pace (but not required)

*See Program Integrity Q & A- SAP: General Questions (SAP), SAP-Q3*

# OTHER KEY SAP ELEMENTS





# SAP POLICY – OTHER KEY ELEMENTS

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- Policy must describe how student's GPA and pace are affected by:
  - *Incompletes*
  - *Withdrawals*
  - *Repetitions*
  - *Transfers of credit from other institutions*

# SAP POLICY – OTHER KEY ELEMENTS

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- Incompletes
  - How does “I” grade impact student’s GPA/pace
  - Once “I” is converted to final grade, school can factor grade in at next formal SAP checkpoint or retroactively, depending on school’s policy

# SAP POLICY – OTHER KEY ELEMENTS

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- Withdrawals
  - Cannot exclude “W”s earned past add/drop period
  - Courses dropped within add/drop period do not have to be factored into SAP

# SAP POLICY – OTHER KEY ELEMENTS

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- Repetitions
  - Decide how repeat coursework impacts qualitative and quantitative measures (credit and clock hour programs)
    - Use all grades, average of grades, highest grade, etc.
- Reference: SAP-Q8 (Program Integrity Q & As)

# SAP POLICY – OTHER KEY ELEMENTS

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- Transfers of credit from other institutions
  - Credit hour programs: Credits accepted toward program completion *must* count as *both* hours attempted and hours completed
  - Clock hour programs: Factor accepted transfer hours into pace and MTF by reducing number of hours remaining in program

# SAP POLICY – OTHER KEY ELEMENTS

## MTF (in calendar time) and Transfer Credits:

Adrian enrolled in Health Administration at GU, a 120 credit, 4-year program. MTF is 150%. Students must complete 20 credits/year minimum to meet 6-year MTF.

GU accepts 25 transfer credits from Adrian's previous school. This means *he completed the 1st year of the original MTF with transfer credits*. He only needs 95 credits to complete the program.

### The remaining MTF is 5 years:

95 credits/ 5 years = 19 credits/year

MTF Year	Minimum Credits to Complete
Year 1	19 credits (cumulative)
Year 2	38 credits (cumulative)
Year 3	57 credits (cumulative)
Year 4	76 credits (cumulative)
Year 5	95 credits (cumulative)

# SAP POLICY – OTHER KEY ELEMENTS

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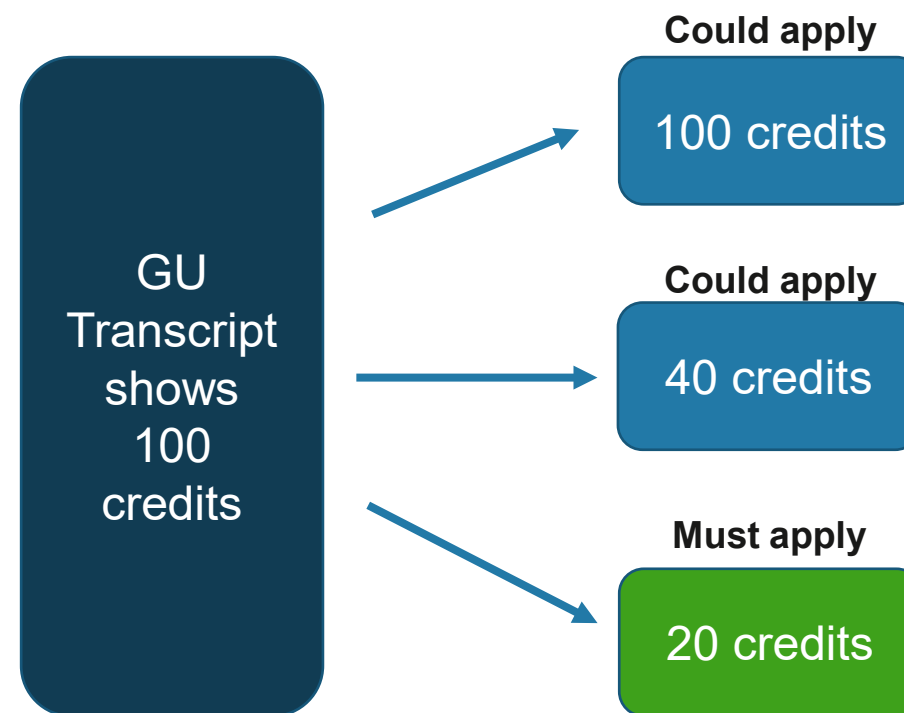
## TRANSFER CREDITS

- *May* include transfer credits in qualitative measure (GPA)
- If consider hours earned from another school under consortium agreement to be transfer hours, *must* include them in quantitative measure
  - *May* include in qualitative measure

# SAP POLICY – OTHER KEY ELEMENTS

## Transfer Credit Example:

- Jen transfers from GU to MSU
- Her GU transcript shows 100 credits
- 40 credits could apply to Jen's program at MSU
- MSU registrar only accepts 20 credits (grades, duplication, etc.)
- *Same concept applies when student changes programs*
  - Must factor in all courses that transfer into new program, but *could* factor in more (or all courses) ever taken at school





# WHEN TO CHECK SAP

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# WHEN TO CHECK SAP

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- Formal SAP evaluations must occur at end of payment period (each payment period, annually, etc.)
  - Official evaluation period cannot be less than payment period
  - May do *informal* checks during payment period
  - If term-based, at end of term



# WHEN TO CHECK SAP – PROGRAMS > 2 YEARS

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- School must also check *qualitative* measure (GPA) at end of second academic year
  - Student must have at least a 2.0 “C” or equivalent; or
  - Student must have academic standing consistent with graduation requirements
- End of “second academic year” means
  - Student at school four semesters or six quarters, regardless of student’s enrollment status

*See Program Integrity Q & A- SAP: SAP Reviews, R-Q2*

# HOW OFTEN TO CHECK SAP

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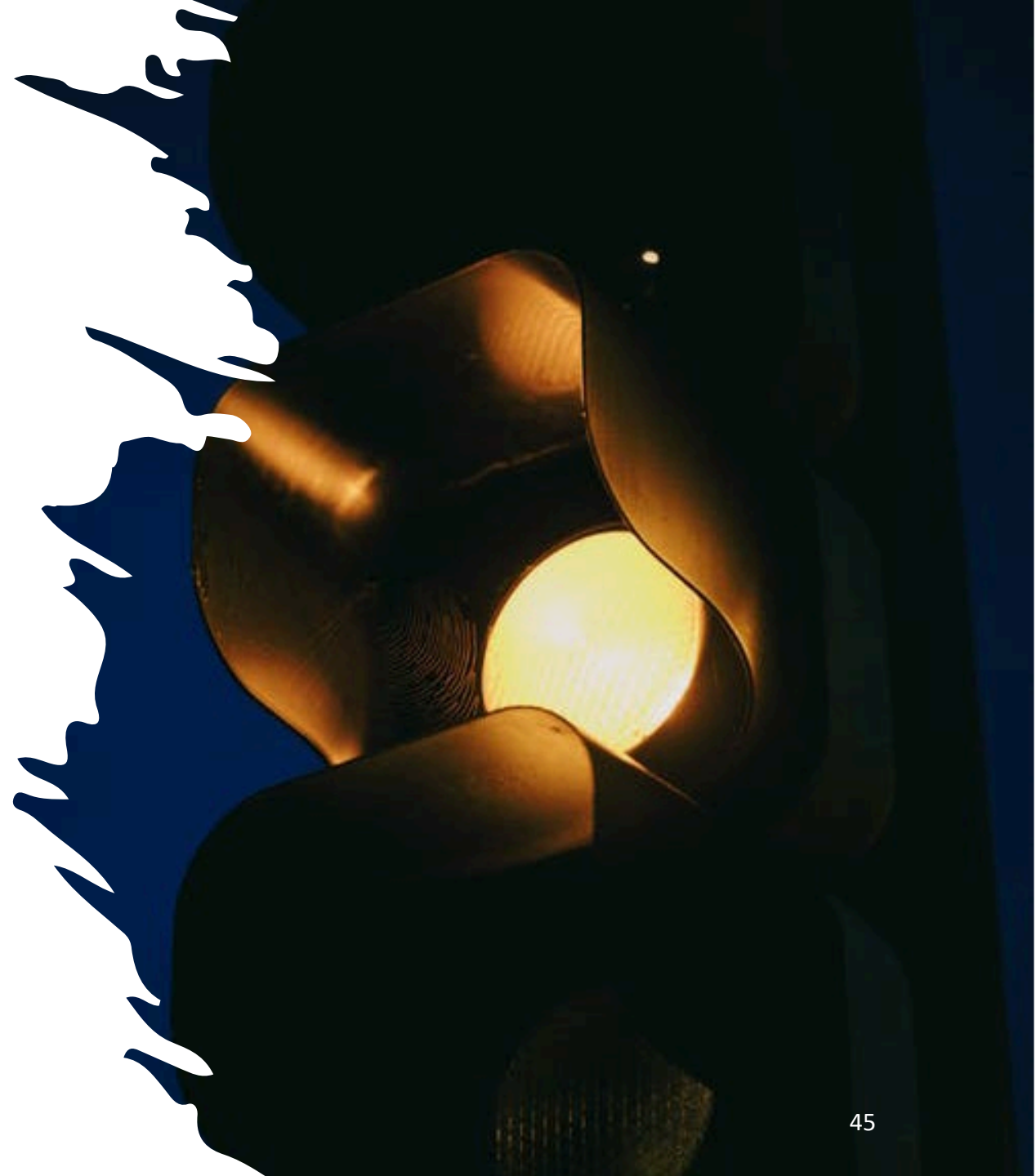
## Programs one academic year or less in length

- Must evaluate SAP at end of *each* PP
  - e.g., 900 clock-hour program; 20 semester credit-hour program

## Programs longer than one academic year

- Must evaluate *at least* annually to correspond with end of PP (at least once every 12 months)
- School *may* evaluate more frequently (e.g., at end of each payment period, etc.)

# **FINANCIAL AID WARNING, APPEALS & PROBATION**



# WARNING PERIOD

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## FINANCIAL AID WARNING STATUS (OPTIONAL)

Only for schools that  
check SAP at end of  
*each* payment period

Students may  
continue to receive  
Title IV aid for ***one  
payment period***  
*No appeal necessary*

May receive more  
than one warning  
period during  
academic career, but  
CANNOT be  
consecutive

Only possible if  
school policy permits  
multiple warnings

# PROBATIONARY PERIOD

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## FINANCIAL AID PROBATION STATUS

Only available if  
school has appeal  
process and student  
successfully **appeals**  
financial aid  
suspension AND

Student can make SAP  
at end of next  
payment period OR

Has **academic plan**  
designed for student  
to meet SAP *by*  
*specific point in time*

# PROBATIONARY PERIOD

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## APPEAL POLICY (OPTIONAL)

Student may petition for reconsideration of TIV eligibility when fail SAP

Based on student illness, injury, death of relative, other special circumstance

Must explain why failed SAP and what has changed to allow student to make SAP at next evaluation



# PROBATIONARY PERIOD

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## ACADEMIC PLANS (OPTIONAL)

Schools not *required* to develop academic plans\*

Schools can set conditions on developing plans

ED does not define what office(s) must develop and oversee academic plans

*\*School may have policy not to grant probation if student cannot make SAP by end of next payment period*

# PROBATIONARY PERIOD

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## FINANCIAL AID PROBATION STATUS

Students on financial aid probation may only receive Title IV funds for **ONE** payment period

No Title IV funds for subsequent payment periods UNLESS:

- *Now making SAP*
- *Meeting requirements in academic plan*

School must check SAP at end of probationary period *(even if SAP normally checked annually)*



# RESOURCES AND REFERENCES

# SAP RESOURCES

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- Title 34 Code of Federal Regulations
  - 668.16(e); 668.32(f); 668.34
  - [e-CFR Title 34 Education](#)
- Federal Student Aid Handbook, Volume 1, Chapter 1
  - [2020-21 FSAH, Volume 1, Chapter 1](#)
- Program Integrity Questions and Answers – Satisfactory Academic Progress\*
  - [Program Integrity Q&A - Satisfactory Academic Progress](#)
- FSA Assessments - Satisfactory Academic Progress
  - [FSA Assessments - Satisfactory Academic Progress](#)

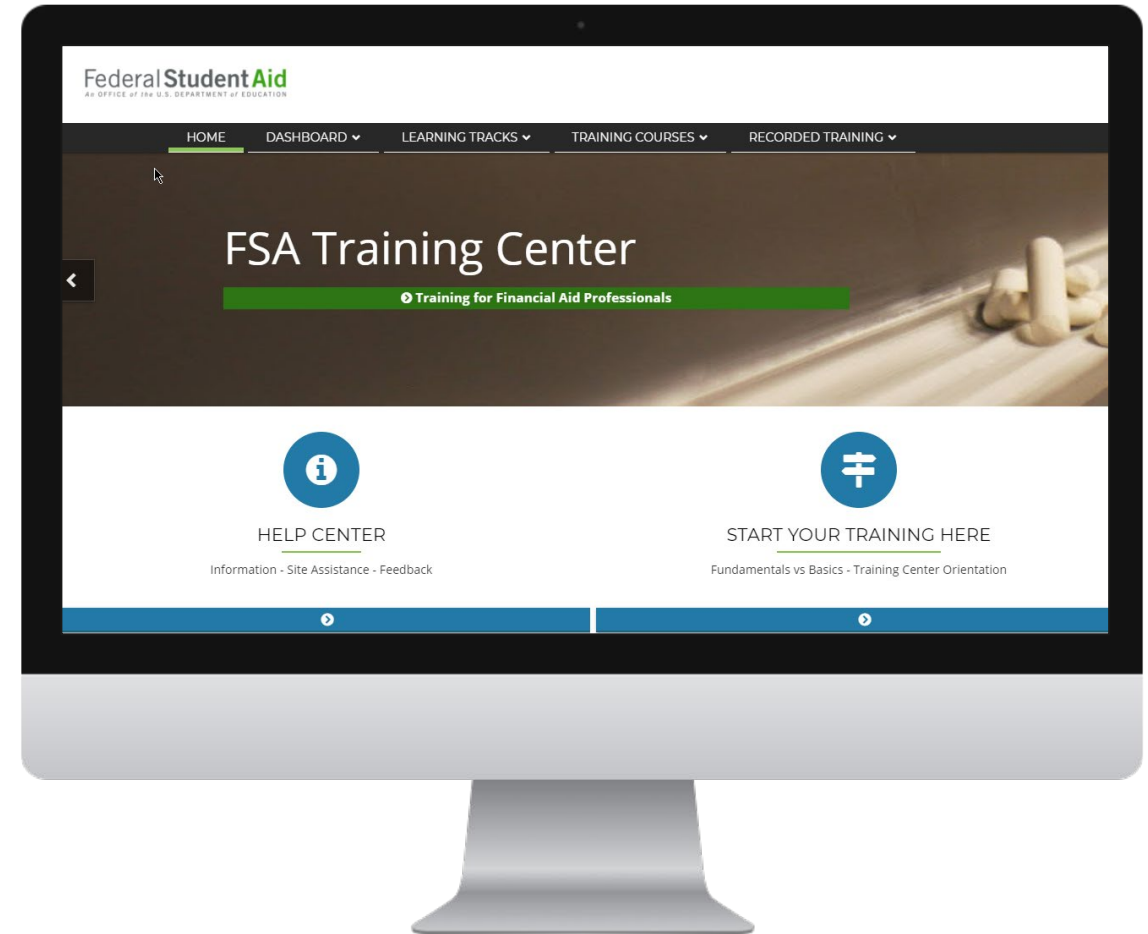
*\*Note: As of 2/17/22, SAP Reviews A- Q9 Option 2 calculation is still incorrect. Example on Slide 50 is correct.*

# FSA TRAINING CENTER

[fsatraining.ed.gov](https://fsatraining.ed.gov)

Take advantage of the FSA Training Center!

- Learning tracks
- Training courses
- Recorded policy and how-to videos
- Software training



# KNOWLEDGE CENTER

[fsapartners.ed.gov/knowledge-center](https://fsapartners.ed.gov/knowledge-center)

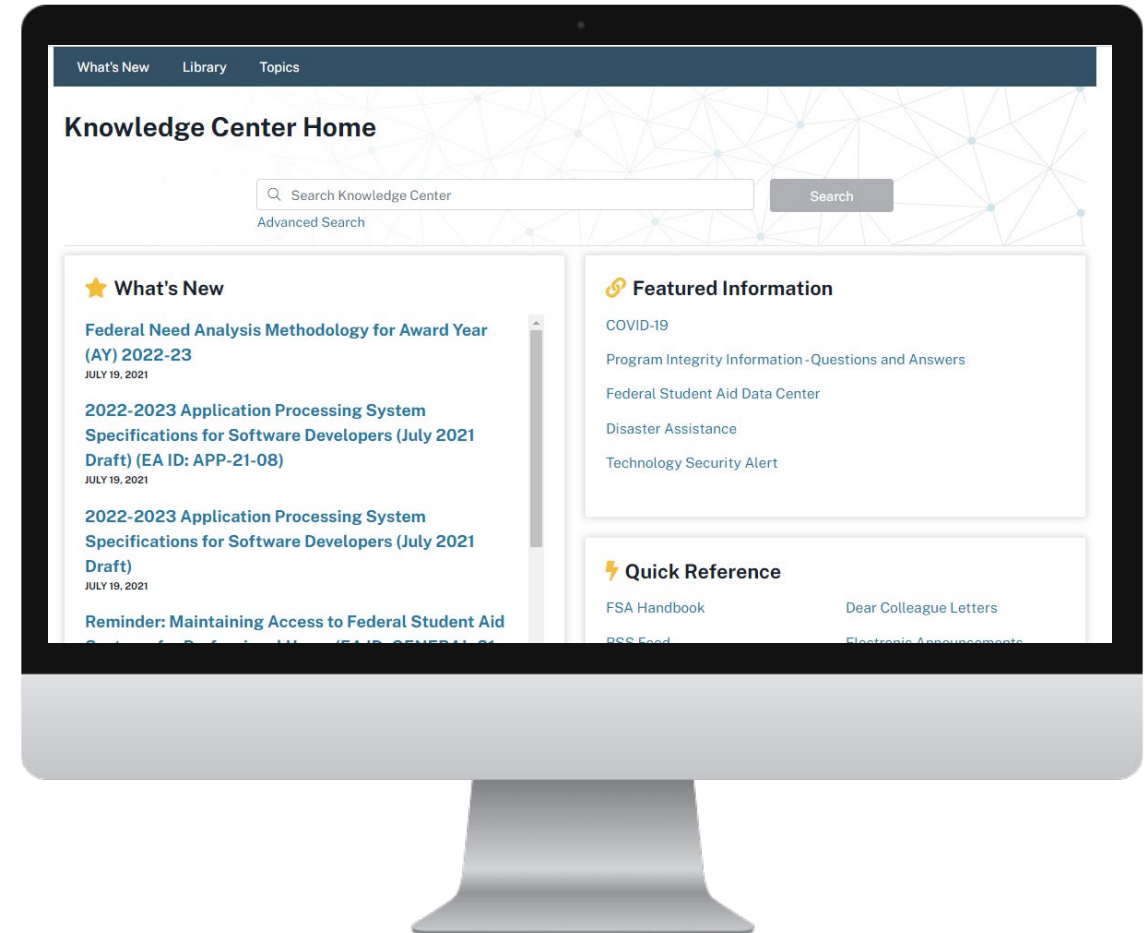
Use the Knowledge Center for  
Title IV resources!

Subscribe for daily or weekly  
email updates. ↓

## Knowledge Center Subscription

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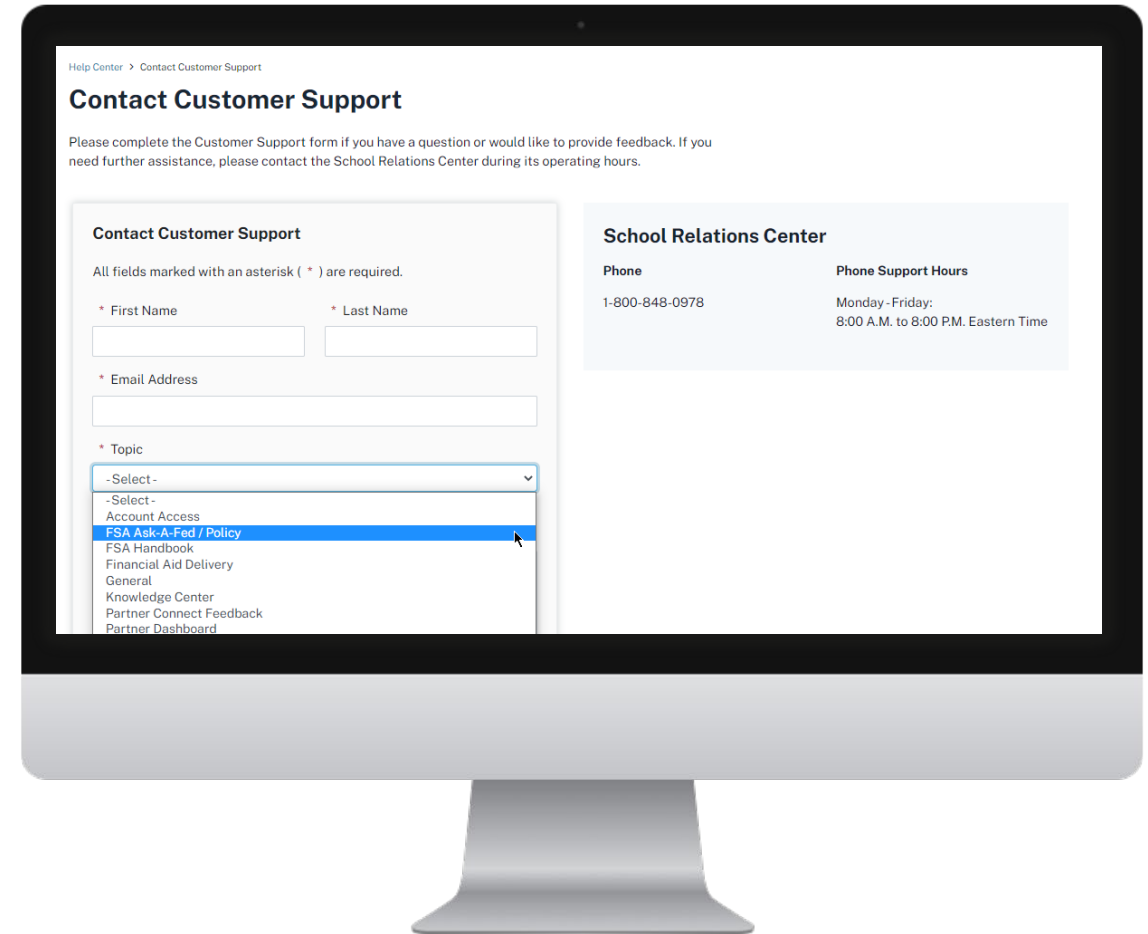


# FSA PARTNER CONNECT HELP CENTER

[fsapartners.ed.gov/help-center/](https://fsapartners.ed.gov/help-center/)

Use *Contact Customer Support Form* in Help Center to ask policy questions.

Choose “Ask A Fed/Policy” from Topic dropdown list.



The screenshot shows a computer monitor displaying the 'Contact Customer Support' form in the FSA Partner Connect Help Center. The browser address bar shows 'Help Center > Contact Customer Support'. The form title is 'Contact Customer Support'. Below the title, a message states: 'Please complete the Customer Support form if you have a question or would like to provide feedback. If you need further assistance, please contact the School Relations Center during its operating hours.' The form itself is divided into two main sections. The left section, titled 'Contact Customer Support', contains a note 'All fields marked with an asterisk ( \* ) are required.' and several input fields: '\* First Name', '\* Last Name', '\* Email Address', and '\* Topic'. The '\* Topic' dropdown menu is open, showing a list of options: '-Select -', '-Select -', 'Account Access', 'FSA Ask-A-Fed / Policy' (which is highlighted in blue), 'FSA Handbook', 'Financial Aid Delivery', 'General', 'Knowledge Center', 'Partner Connect Feedback', and 'Partner Dashboard'. The right section, titled 'School Relations Center', contains contact information: 'Phone: 1-800-848-0978' and 'Phone Support Hours: Monday-Friday: 8:00 A.M. to 8:00 P.M. Eastern Time'.

# TRAINING FEEDBACK

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All attendees will receive email from FSA with online evaluation link

- Helps ensure quality training
- Informs FSA of areas for improvement
- Serves as effective tool for “listening” to our school partners





# THANK YOU!



# QUESTIONS?

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# ADDITIONAL SAP POLICY GUIDANCE

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# SAP – COVID-19 FLEXIBILITIES

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- CARES Act Section 3509 and May 15, 2020 Electronic Announcement
  - School can exclude attempted credits students unable to complete due to COVID-19 national emergency from SAP quantitative component (pace) *if*
    - School reasonably determines is result of COVID-19 related circumstance (*no SAP appeal necessary*)
    - School temporarily ceases operations during period of enrollment, attempted credits for ALL affected students (specific to that enrollment period) may be excluded
  - Applies to SAP assessments made through *end of payment period that includes last date national emergency is in effect*

# POLICY Q & A - PROBATION

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PROB-Q4: How many times may a student be placed on probation for failing to meet SAP standards?

PROB-A4: A student may be placed on probation for one payment period per appeal. It is possible that a student could be placed on probation more than once in his or her academic career.

- New and updated information, additional and new circumstances are expected in subsequent appeals

# POLICY Q & A – ACADEMIC PLANS

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ACP-Q4: Must the academic plan be mathematically set to graduate student within 150% timeframe?

ACP-A4: The academic plan must be designed to ensure that the student is able to meet the institution's satisfactory academic progress standards by a specific point in time. In some cases, this *could mean that the maximum timeframe would be extended based on the student's approved appeal.*

**10/29/10 Federal Register reminds schools that 150% maximum timeframe can be appealed**

# POLICY Q & A – NON-ACCEPTED CREDITS

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SAP-Q6: SAP regulations require credit-hours accepted toward student's program count as both attempted and completed when calculating pace for SAP. Can an institution's policy include *non-accepted credits* as attempted credits for purposes of these calculations?

SAP-A6: Yes. The treatment of these credits would be up to the institution. The SAP regulations do not address non-accepted credits.

- May refer to transfer credits or credits earned in other academic programs at your school

# POLICY GUIDANCE – PRIOR PERIODS

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Question: For a school that checks SAP at the end of each payment period, if a student is not receiving Title IV (TIV) aid for their first three semesters (never applied for aid) but does so poorly in each of the semesters that cumulatively he is not making SAP after each semester, if he later applies for Title IV aid has his warning period already elapsed?

Answer: Yes. The student would be suspended from TIV aid and would only be eligible for TIV aid if an appeal was approved for probation. Past periods not making SAP, whether receiving aid or not, can and do impact TIV eligibility in future terms.



# POLICY GUIDANCE – ACADEMIC PLANS

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Question: The regulations indicate that an academic plan must be designed for a student to meet SAP by a specific point in time. How do we define a future point in time?

Answer: Where applicable a date should be used. If a date cannot be confirmed then a school should use some kind of defined end-point – after the third semester, anticipated graduation date, etc. If the graduation point is after the 150% max timeframe, the graduation point should be indicated in some format. It cannot simply be an open-ended process; needs to be a finite point.

# POLICY GUIDANCE – ACADEMIC PLANS

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Question: Can the school include a five-hour student success workshop (financial aid policies, student services, academic planning, etc.) as part of the student's academic plan?

Answer: Yes. The regulations are silent on what conditions must or can be included in an academic plan. The school would have to outline the workshop process in their SAP policy if they determine they want to use it in their academic plans.

# POLICY GUIDANCE – REGAINING ELIGIBILITY

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Question: What happens if a student is on an academic plan and at the end of a payment period they are not meeting the plan requirements but are now meeting the general SAP standards?

Answer: Once a student is meeting the general SAP standards at a checkpoint, regardless of the plan, they are now in good standing (main point of the plan is to help the student meet the SAP standards). A school may want to indicate in a plan that a student can continue receiving TIV aid if they meet the plan criteria or meet all general SAP standards.

# POLICY GUIDANCE – REGAINING ELIGIBILITY

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Question: If a student's SAP appeal is not approved until the middle of a payment period, is the student eligible for any Title IV aid in the payment period?

Answer: Yes. Once an appeal is approved and a student placed on probation, they are *eligible for Title IV aid back to the beginning of the payment period in which the appeal was approved.*

# POLICY GUIDANCE – GRADE CHANGES

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Question: Does SAP have to be recalculated for prior periods due to retroactive grade changes?

Answer: No. *Institutions are not required to recheck SAP and/or recalculate as the result of grade changes that occur between formal SAP evaluations (end of a payment period).* However, nothing precludes an institution from rechecking SAP to account for such changes based on the school's policy. Regardless if the school has a policy of rechecking SAP between evaluation points, any grade changes must be accounted for in the next scheduled SAP evaluation.

Note: *If an institution makes grade changes for a past period after the subsequent payment period (for Pell) or academic year/award year (for other aid) has ended, it can include those changes in future SAP evaluations, but should not alter aid provided to the student on the basis of original evaluations.*

# POLICY GUIDANCE – TRANSCRIPTS

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Question: In reviewing transcripts, what happens if a transcript comes in during a semester? When would the transfer hours impact SAP?

Answer: Per policy, the transfer hours on the transcript that could count in SAP would be factored in at the next scheduled SAP check point.



# POLICY Q & A - AMNESTY

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APP-Q4: May an institution's SAP policy include automatic "academic amnesty" in certain circumstances, such as, after a student has not attended for a certain number of payment periods or years?

APP-A4: No. The regulations permit use of the automatic financial aid warning status for institutions that review SAP at each payment period. No other status may be granted automatically. A successful appeal is needed to grant financial aid probation status or to develop an academic plan.

*Reminder - Courses removed or changed as a result of an institutional academic amnesty policy, must still be counted for SAP purposes*