


UNDERSTANDING YOUR SATISFACTORY ACADEMIC PROGRESS POLICY



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U.S. Department of Education
Oklahoma Spring 2022 Conference

Federal Student Aid
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AGENDA

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)

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SAP COMPLIANCE CONCERNS

☐ 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

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SAP POLICY BASICS

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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)

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SAP POLICY BASICS

- 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

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SAP POLICY BASICS

- 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

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SAP POLICY BASICS

- 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](#)

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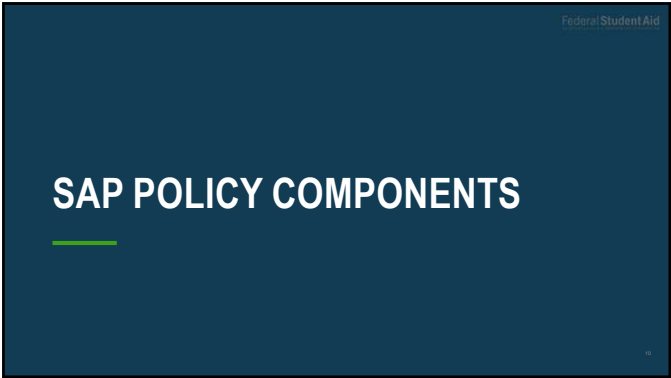
SAP POLICY BASICS

- 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)

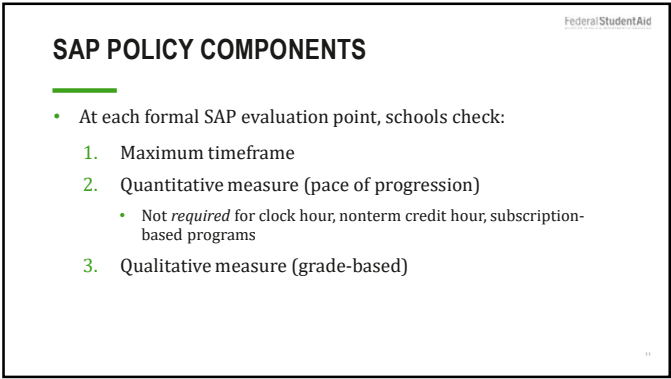
Note: No regulatory requirement for school to notify non-TIV students of their eligibility for Title IV aid

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MAXIMUM TIMEFRAME (MTF)

- 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*

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MAXIMUM TIMEFRAME (MTF)

Clock hour programs

Example: 1200 clock hours, 40-week program

Published program length (time)

40 weeks

×

MTF percentage

150%

=

MTF in calendar time

60 weeks

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MAXIMUM TIMEFRAME (MTF)

Credit hour programs

Published program length (hours)

120 credit hours

×

MTF percentage

150%

=

MTF in attempted credits

180 attempted credits

OR

Published program length (time)

4 years

×

MTF percentage

150%

=

MTF in calendar time

6 years

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MAXIMUM TIMEFRAME (MTF)

Credit hour programs (calendar time MTF)

Published program length (time)

×

MTF percentage

=

MTF in calendar time

- 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

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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 ($160 + 25 = 185 > 180$).



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QUANTITATIVE MEASURE (PACE)




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QUANTITATIVE MEASURE (PACE)

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



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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

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QUANTITATIVE MEASURE (PACE)

REQUIRED

Credit Hour Programs

- Standard term
- Non-standard term



NOT REQUIRED

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

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Slide 19

A0 May want to stress or point out (on slide or in speaker notes) that though not required nothing prevents a clock hour, nonterm or subscription-based program from having a quantitative measurement if so desired; also there is verbiage related to the photo just below the slide that may need to be removed

Author, 2022-02-14T14:59:36.036


ATO 0 DONE... It's in speaker's notes.

Arva Thomas, 2022-02-17T15:55:03.236

QUANTITATIVE MEASURE (PACE)

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




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QUANTITATIVE MEASURE (PACE)

Pace evaluation not required for subscription-based programs

- Students must complete credits associated with enrollment status for *all* prior payment periods (PP) as required* to receive subsequent disbursements
- No set time to begin/end coursework each term



*Credit completion minimums begin with third subscription period

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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)



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A0 MTF in calendar time is not simply dividing hours by the overall MTF but reviewing the hours completed and determining if they meet the minimum # required to graduate within the MTF this is because the school can determine the minimum number of hours per year based on required coursework; number of hours may vary based on term lengths, courses, program requirements, etc.; it may not always be (nor is it required to be) even

Author, 2022-02-14T15:36:07.206

ATO 0 DONE. Hours completed at the evaluation point
COMPARED WITH
Number of hours that the student should have completed by the
evaluation point in order to complete the program within the
maximum timeframe (calendar time)

Arva Thomas, 2022-02-17T15:52:48.823


QUANTITATIVE MEASURE (PACE)

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 2nd semester Jill has completed 16 cumulative credits out of 24 attempted credits.

- 16 completed/24 attempted = 67% pace



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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)

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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)
Year 2	40 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)

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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)
Year 2	40 credits (cumulative)
Year 3	45 credits (cumulative)
Year 4	70 credits (cumulative)
Year 5	95 credits (cumulative)
Year 6	120 credits (cumulative)

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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 st PP	10 credits (cumulative)
2 nd PP	20 credits (cumulative)
Summer PP1 (optional)	20 credits (cumulative)
3 rd PP	30 credits (cumulative)
4 th PP	40 credits (cumulative)
Summer PP2 (optional)	40 credits (cumulative)
5 th PP	50 credits (cumulative)
6 th PP	60 credits (cumulative)
Summer PP3 (optional)	60 credits (cumulative)

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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 st PP	7 credits (cumulative)
	2 nd PP	14 credits (cumulative)
	3 rd PP Summer	20 credits (cumulative)
AY 2	4 th PP	27 credits (cumulative)
	5 th PP	34 credits (cumulative)
	6 th PP Summer	40 credits (cumulative)
AY 3	7 th PP	47 credits (cumulative)
	8 th PP	54 credits (cumulative)
	9 th PP Summer	60 credits (cumulative)

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QUANTITATIVE MEASURE (PACE)

Determining pace for **clock hour** programs (NO LONGER REQUIRED)

Hours successfully completed in PP

+

Scheduled hours in PP


AND

Weeks successfully completed in PP

+

Weeks in PP

**PP is payment period*



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QUALITATIVE MEASURE



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QUALITATIVE MEASURE

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

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QUALITATIVE MEASURE - REMEDIAL

- 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

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OTHER KEY SAP ELEMENTS

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SAP POLICY – OTHER KEY ELEMENTS

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

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SAP POLICY – OTHER KEY ELEMENTS

- 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

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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)

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SAP POLICY – OTHER KEY ELEMENTS

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

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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

GU Transcript shows 100 credits

Could apply 100 credits

Could apply 40 credits

Must apply 20 credits

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WHEN TO CHECK SAP



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WHEN TO CHECK SAP

- 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



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WHEN TO CHECK SAP – PROGRAMS > 2 YEARS

- 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

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WHEN TO CHECK SAP – CLOCK-HOURS


Evaluation "at end of payment period"

- Three options:
 - When student's *scheduled clock-hours* for payment period have elapsed, regardless of whether student attended them
 - When student has *attended* scheduled clock-hours
 - When student *successfully completes* scheduled clock-hours for payment period

School must establish one review option for program

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WHEN TO CHECK SAP – CLOCK-HOUR EXAMPLE



Background:

- 1200 clock-hour culinary arts program, 40 weeks
- Payment periods: 450 hours/15 weeks; 450/15; 300/10
- Jacque scheduled 30 hours per week
- MTF is 150% x 40 weeks = 60 weeks
- Pace* requirement is 67% completion rate
- Evaluate SAP each payment period

*Not required for clock hour programs


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WHEN TO CHECK SAP – CLOCK-HOUR EXAMPLE

Option #1 – Scheduled Hours

- At 450 *scheduled* hours and 15 weeks, Jacquie successfully completed 300 hours
 - 300 hours / 450 hours = 67% completion
 - 10* weeks / 15 weeks = 67% completion expressed in calendar time
 - Both items checked
- Jacquie is making SAP but *not yet eligible for second disbursement* until successfully completes 450 hours (and 15 weeks instructional time)
- Next SAP review at 900 *scheduled* hours



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*300 hours / 30 hours per week = 10 weeks


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WHEN TO CHECK SAP – CLOCK-HOUR EXAMPLE

Option #2 – Attended Hours

- At 450 *attended* hours, 600 scheduled hours has elapsed over 20 weeks; Jacquie *successfully completed 420 hours*.
 - 420 hours / 600 hours = 70% completion
 - 14 weeks / 20 weeks* = 70% completion as expressed in calendar time
 - Both items checked
- Jacquie is making SAP *but not yet eligible for second disbursement* until successfully completes 450 hours (and 15 weeks instructional time)
- Next SAP review at 900 *attended* hours



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*420 hours / 30 hours per week = 14 weeks; 600 hours / 30 hours per week = 20 weeks


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WHEN TO CHECK SAP – CLOCK-HOUR EXAMPLE

Option #3 – Successfully Completed Hours

- At 450 *successfully completed* hours, 600 scheduled hours elapsed in 20 weeks
 - 450 hours / 600 hours = 75% completion
 - 15 weeks / 20 weeks = 75% completion expressed in calendar time
 - Both items checked
- Student is making SAP and has successfully completed both hours and weeks in payment period; School may make second disbursement at this time
- Next review at 900 *successfully completed* hours



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WHEN TO CHECK SAP – NONTERM CREDIT HOUR

Evaluation “at end of payment period”

- Two options:
 - On date when student *scheduled* to earn credit-hours; or
 - When student *successfully* earns credit-hours

Example:
School offers 20 credit-hour program taught over 30 weeks with two payment periods (PP) of 10 credit-hours/15 weeks

- School must check SAP at end of first PP:
 - When student is *scheduled to complete* 10 credit-hours; OR
 - When student *successfully completes* (passes) 10 credit-hours

School must establish one review option for program

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HOW OFTEN TO CHECK SAP

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.)

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FINANCIAL AID WARNING, APPEALS & PROBATION



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We provide access to a broad spectrum of education.

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PROBATIONARY PERIOD

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

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PROBATIONARY PERIOD

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)

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RESOURCES AND REFERENCES

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SAP RESOURCES

- 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.




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fsatraining.ed.gov

Take advantage of the FSA Training Center!

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



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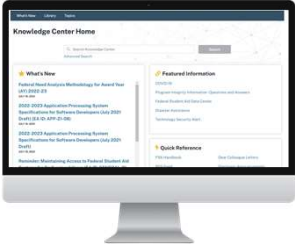
fsapartners.ed.gov/knowledge-center

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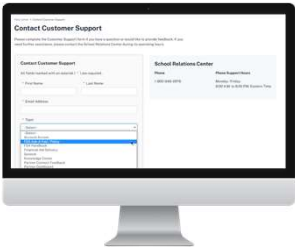
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FSA PARTNER CONNECT
HELP CENTER

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.




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TRAINING FEEDBACK


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



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THANK YOU!






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QUESTIONS?



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ADDITIONAL
SAP POLICY
GUIDANCE



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SAP – COVID-19 FLEXIBILITIES

- 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*

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POLICY Q & A - PROBATION

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

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POLICY Q & A – ACADEMIC PLANS

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

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POLICY Q & A – NON-ACCEPTED CREDITS

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

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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.

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

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