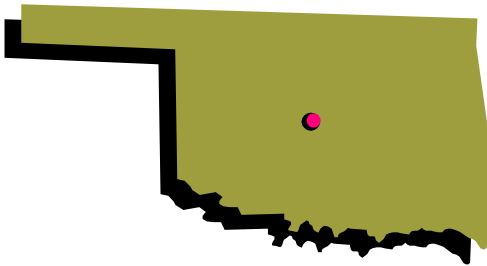




Satisfactory Academic Progress for Clock Hour Schools

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CURRENT REGULATIONS

- Student Eligibility
- Institutional Eligibility
(Administrative Capability)
- Consumer Information



Student Eligibility

Maintains satisfactory progress in his/her course of study according to school's published standards

- § 668.32(f)
- § 668.34



Administrative Capability

Establishes, publishes, and applies reasonable standards for measuring if a student is maintaining satisfactory progress in his/her educational program

§ 668.16(e)



Consumer Information

- Publish and make readily available to current and prospective students
 - standards for making satisfactory progress
 - criteria for reestablishing eligibility if SAP is violated
- § 668.42(c)(2)



SAP Standards

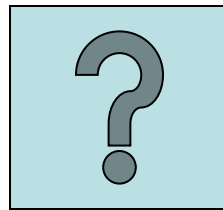
- Apply to all Title IV programs
- Consistently Applied
- Reasonable



SAP Standards

Must be same as or stricter than standards for non-Title IV students in same educational program

- Does your school have different academic standards for enrollment and for Title IV eligibility? Some schools do, some don't.





SAP Standards Must Include

Two Components

- Qualitative
- Quantitative
- ❖ Both must be cumulative



Qualitative Standard

To assess quality of academic work

- Use standards measurable against a norm
 - grades
 - work projects
- May use fixed or graduated standard



Fixed Standard Example - Current

A student must maintain a cumulative grade point average of 2.0 after two terms of enrollment, and subsequently, each year.



Graduated Standard Example

Grade Point Average Requirements

- 1 to 30 hours attempted=1.6 cum GPA
- 31 to 60 hours attempted=1.8 cum GPA
- 61 hours attempted to graduation=2.0 cum GPA



Academic Programs Longer Than Two Years

- By the end of the second academic year, student must have:
 - a “C” average or its equivalent
- OR
- academic standing consistent with graduation requirements
- Years measured in time, not grade level



Mitigating Circumstances Regarding “C” After Two Years - current

These standards may be set aside if certain circumstances affect progress

- death of a relative
- injury or illness of student
- other special circumstances



Quantitative Standard - Current

To measure progress toward course completion.



Maximum Time Frame

- Undergraduates may receive aid for a maximum of 150% of the published length of the educational program
 - cumulative, including periods without Title IV assistance



Maximum Time Frame

School must develop a written policy establishing a maximum time frame in which a graduate student must complete the program.



Clock Hour Max Time

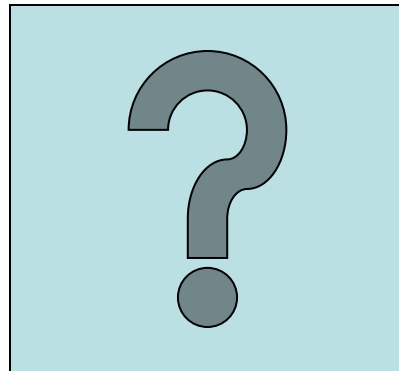
Must use calendar time

- 900 clock hour program takes 8 months to complete
 - $8 \times 150\% = 12$ months is maximum time frame



Evaluating Student Progress

- How often should students' progress be evaluated?





Evaluating Time Frame

- Must be divided into equal evaluation periods
 - Evaluation periods cannot exceed the lesser of one half of the program or one academic year



Programs One Year Or Less

School must evaluate progress at least once, at the half-way point.



Clock Hour Program Example

8 months/900 clock hours

- program is one year in length
- one half of the program =
4 month evaluation periods



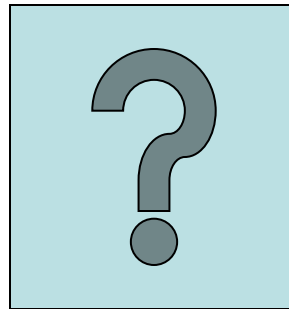
Programs Longer Than One Year

School must evaluate progress at least once per year.



Evaluating Student Progress

How much work must be completed at end of each evaluation period?





Student Must Complete Within Maximum Time Frame

Your policy may require

- a fixed amount of work that must be completed in each evaluation period
- a percentage of work that must be completed in each evaluation period



Clock Hour Program - 12 Month Maximum Timeframe

4 months / 12 months = 34%

- 34% X 900 = 306 clock hours
- 306 clock hours in 4 month period



Course Repeats

Effect on progress

- Qualitative - average grades, count both grades, or count the higher grade
- Quantitative - included in maximum time frame
- ❖ May only count toward enrollment status if receiving credit



Do you grant these grades?

- Incompletes
- Withdrawals
- Non-credit remedial courses



Transfer Students

- May make initial disbursement
- If no hours transferred in, then SAP evaluated solely on work at current school
- If received transfer hours, those must be included when determining progress toward maximum time frame



Probation/Warning

- Optional
- Length of probation
- Stipulations a student must meet
- Notification process



Major/Degree Changes

Effect of/on maximum timeframe

- Take hours earned and apply toward max time
 - Student eligible for aid for 150% of remaining required hours
- Does it require an appeal?



Appeal Policy

- Specific procedures for student to appeal if not making satisfactory progress



SAP policy

Must contain:

- Qualitative measurement:
- Must consist of grades, work projects completed, or other factors measurable against a norm.
- Quantitative measurement:
- Maximum time frame for completion of the certificate or degree program must not exceed 150% of the published length of the program.
- Division of time frame into increments (may not exceed the lesser of one academic year or one-half of the published program length).
- Schedule of work designating a minimum amount of work a student must successfully complete during each increment in order to complete within the maximum time frame.



SAP policy

- Institutions must determine how they will treat the following:
- Periods when a student doesn't receive Title IV aid (must be counted toward maximum time frame)
- Probation (if applicable)
- Transfer students (transfer hours must be counted towards maximum time frame—how will the institution treat accepted transfer hours with regard to maximum time frame?)
- Changes in majors or degrees (if applicable)
- Pursuit of a second degree/certificate (if applicable)



SAP policy

- The policy must define the effect of incompletes, course repetitions, withdrawals and noncredit remedial courses on satisfactory academic progress.
- Question: Do you offer grades of I's, R's or W's?



SAP policy

- The policy must include specific appeal procedures:
- Specify the mitigating circumstances that will be evaluated.
- Include specific procedures to be followed after an adverse determination for the evaluation of a student's mitigating circumstances when presented on appeal.
- Detail the student's responsibilities during the probationary period due to mitigating circumstances.
- Include specific procedures to re-establish eligibility.
- Include the student's responsibilities during the probationary period.
- Include specific procedures and minimum requirements for reinstatement of aid after a student's aid has been terminated for lack of satisfactory academic progress.



How To Re-establish Eligibility

If an appeal is unsuccessful or the institution does not have an appeal process.



Disbursement of Funds

Make certain that student meets satisfactory academic progress standards as of last time your policy required evaluation.



PROPOSED REGULATIONS



Negotiated Rulemaking

- Hearings in Denver, Little Rock, and Philadelphia—June 2009
- Federal Register Notice—September 2009
- Two Teams—Program Integrity and Foreign Schools



Program Integrity

- 14 issues
- Three meetings—November and December 2009 and January 2010
- Consensus not reached



Program Integrity

- Notice of Proposed Rulemaking—
June 18, 2010
- Comment period ended—August 2,
2010
- Final regulations—November 1, 2010
- Effective date—July 1, 2011



Program Integrity

Why was Satisfactory Academic Progress on the agenda?

- Last comprehensive look in 1983
- Inconsistent terminology used by institutions
- Repeated, sequential use of probationary periods
- More structured, comprehensive and consistent approach



§ 668.16(e) Standards of Administrative Capability

Current Regulations

- Require institutions to establish, publish and apply reasonable SAP standards
- Specify what is reasonable



§ 668.16(e) Standards of Administrative Capability

Proposed Regulations

- Require institutions to establish, publish and apply reasonable SAP standards that meet the requirements of § 668.34



§ 668.32 Student Eligibility-- General

Current Regulations

- Require a student to meet the standards in § 668.16 and § 668.34



§ 668.32 Student Eligibility-- General

Proposed Regulations

- Require a student to maintain SAP according to the institution's standards that meet the requirements in § 668.34



§ 668.34 Satisfactory Academic Progress

Current Regulations

- List specific requirements for students enrolled in programs longer than two years



§ 668.34 Satisfactory Academic Progress

Proposed Regulations

- Describe all of the required elements of a satisfactory academic progress policy
- Retain significant institutional flexibility



§ 668.34 Satisfactory Academic Progress

- Required elements for a reasonable SAP policy
- Continued flexibility for institutions in establishing their SAP policy
- Additional flexibility for institutions that monitor SAP more often than annually



§ 668.34 Satisfactory Academic Progress

- Makes explicit—
 - Policy must specify the pace of progression to ensure completion within the maximum time frame; and
 - Pace is measured at each evaluation



§ 668.34 Satisfactory Academic Progress

- Requires institutions to count transfer hours accepted toward completion of the student's program as both hours attempted and hours completed



§ 668.34 Satisfactory Academic Progress

- In general, a student who is not making SAP is no longer eligible for Title IV aid



§ 668.34 Satisfactory Academic Progress

Financial Aid Warning

- Status assigned to a student who fails to make SAP at an institution that evaluates SAP at the end of each payment period
- Student may continue to receive Title IV aid for one payment period
- No appeal necessary



§ 668.34 Satisfactory Academic Progress

Financial Aid Probation

- Status assigned by an institution to a student who fails to make SAP and who has appealed and has had eligibility for Title IV aid reinstated
- Institution may impose conditions for student's continued eligibility to receive Title IV aid



§ 668.34 Satisfactory Academic Progress

Appeal

- Process by which a student who is not meeting the institution's SAP policy petitions the institution for reconsideration of the student's eligibility for Title IV aid



§ 668.34 Satisfactory Academic Progress

Appeal (continued)

- Must specify the conditions under which a student may appeal
- The student's appeal must include—
 - Why the student failed to make SAP; and
 - What has changed that will allow the student to make SAP at the next evaluation



§ 668.34 Satisfactory Academic Progress

Institutions that evaluate SAP each payment period

- Student loses eligibility for Title IV aid
- Student may be placed on Financial Aid Warning
- Student may be placed on Financial Aid Probation



§ 668.34 Satisfactory Academic Progress

Institutions that evaluate SAP each payment period

- After one payment period on Financial Aid Warning, student must make SAP or appeal and be placed on Probation after an appeal



§ 668.34 Satisfactory Academic Progress

Institutions that evaluate SAP each payment period

- After Financial Aid Probation, the student must be making SAP or be successfully following an academic plan



§ 668.34 Satisfactory Academic Progress

Institutions that evaluate SAP less often than each payment period

- Student loses eligibility for Title IV aid
- Student may appeal and be placed on Financial Aid Probation



§ 668.34 Satisfactory Academic Progress

Institutions that evaluate SAP less often than each payment period

- After Financial Aid Probation, the student must be making SAP or be successfully following an academic plan



§ 668.34 Satisfactory Academic Progress

Student Notifications

- Must notify student of results of SAP review that impacts the student's eligibility for Title IV aid
- If the institution has an appeal process, must describe the specific elements required to appeal SAP



§ 668.34 Satisfactory Academic Progress

Student Notifications

- If the institution does not have an appeal process, must describe how a student who has failed SAP reestablishes eligibility for Title IV aid



QUESTIONS ??



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