



# Program Integrity Final Rules


Satisfactory Academic Progress (SAP) —  
Positioning College Students for Success




## Agenda




- Review new SAP regulations
  - Effective July 1, 2011
- SAP discussion questions
- Resources




SAP


- Structurally moves SAP rules under §668.34
  - §668.16 still defines SAP as one of a school's administrative capability requirements
- Specifies elements a school's SAP policy must contain to be considered a reasonable policy
- Provides more flexibility if schools evaluate SAP after every payment period than if they evaluate SAP less frequently

§ 668.34




SAP


- Specifies the pace at which a student must progress through a program to ensure the student completes it within the maximum timeframe
 

$$\text{Pace} = \frac{\text{Total cumulative hours completed}}{\text{Total cumulative hours attempted}}$$
- Measures the pace at each SAP evaluation

§668.34(a)(5)



## Satisfactory academic progress (SAP)



- A school's SAP policy must include:
  - How GPA and pace of completion are affected by
    - Incompletes
    - Withdrawals
    - Repetitions
    - Transfers of credit from other schools
      - Must count transfer hours that are accepted toward a student's program as both hours attempted and hours completed

§ 668.34 (a)(6)



## SAP



- Standardize terms:
  - *Financial aid warning*
    - Status assigned to a student who fails to make SAP at a school that evaluates SAP after each payment period
  - *Financial aid probation*
    - Status assigned by a school to a student who fails to make SAP, successfully appeals, and has eligibility for aid reinstated

§668.34(b)



## SAP



- Standardize terms:
  - *Maximum timeframe* does not change:
    - For an undergraduate program measured in credit hours, cannot exceed 150% of the published length of the program
    - For an undergraduate program measured in clock hours, cannot exceed 150% of the published length of the program, measured by the cumulative number of clock hours the student is required to complete

§668.34(b)



## SAP



- Standardize terms (*cont'd.*):
  - *Maximum timeframe* does not change:
    - For a graduate program, 150% rule does not apply, but the school
      - Must develop a policy for students in a program, and
      - Disseminate and consistently apply that policy


§668.34(b)



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- Standardize terms:
  - *Appeal*
    - Process by which a student not meeting a school's SAP standards petitions for reconsideration of Title IV eligibility


§668.34(b)

The logo features a stylized blue and green building with a column, positioned above the text "SOLID FOUNDATION FOR STUDENT SUCCESS" in a blue and green color scheme.


**SAP** **TG**<sup>™</sup>

- If a school permits an appeal process, the policy must describe:
  - How the student may re-establish Title IV eligibility;
  - The basis on which a student may file an appeal; and
  - Information the student must submit regarding why the student failed to make SAP, and what has changed in the student's situation that will allow the student to demonstrate SAP at the next evaluation

§668.34(a)(9)


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## SAP




- Schools are divided into two categories:
  - Schools that evaluate SAP after each payment period
  - Schools that evaluate SAP annually or less frequently than each payment period

§668.34(a)(3), (c) and (d)




## SAP

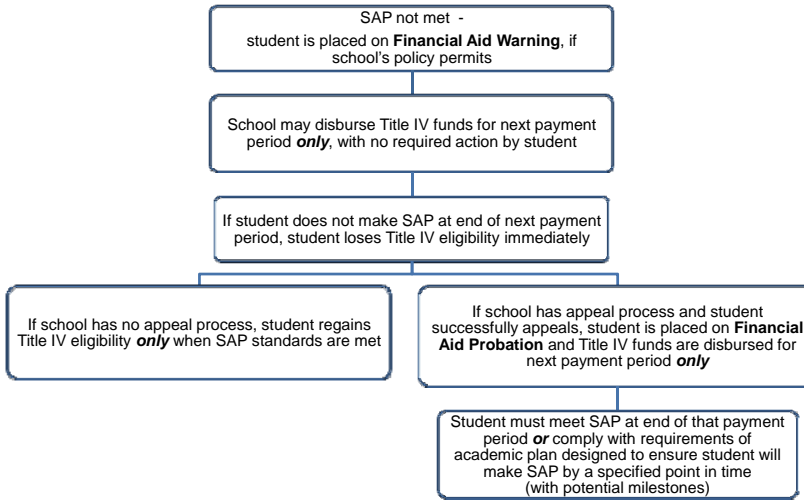


- For schools that evaluate SAP after each payment period, when a student does not meet SAP the school has two options:
  - Option 1: Student may be placed on *financial aid warning* and receive Title IV funds for the next payment period **only**
  - Option 2: Student loses Title IV eligibility immediately

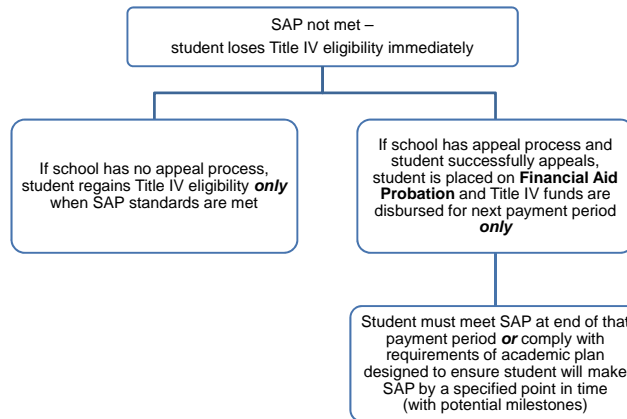
§668.34(c)



### School evaluates SAP after each payment period—Option 1




### School evaluates SAP after each payment period—Option 2



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- For a school that evaluates SAP annually, or less frequently than each payment period
  - A student not making SAP may receive Title IV funds **only** after filing a successful appeal, if permitted by the school
  - After a successful appeal, the student is placed on *financial aid probation*
    - If the school does not permit appeals, the student must re-establish SAP to receive Title IV funds


§668.34(d)

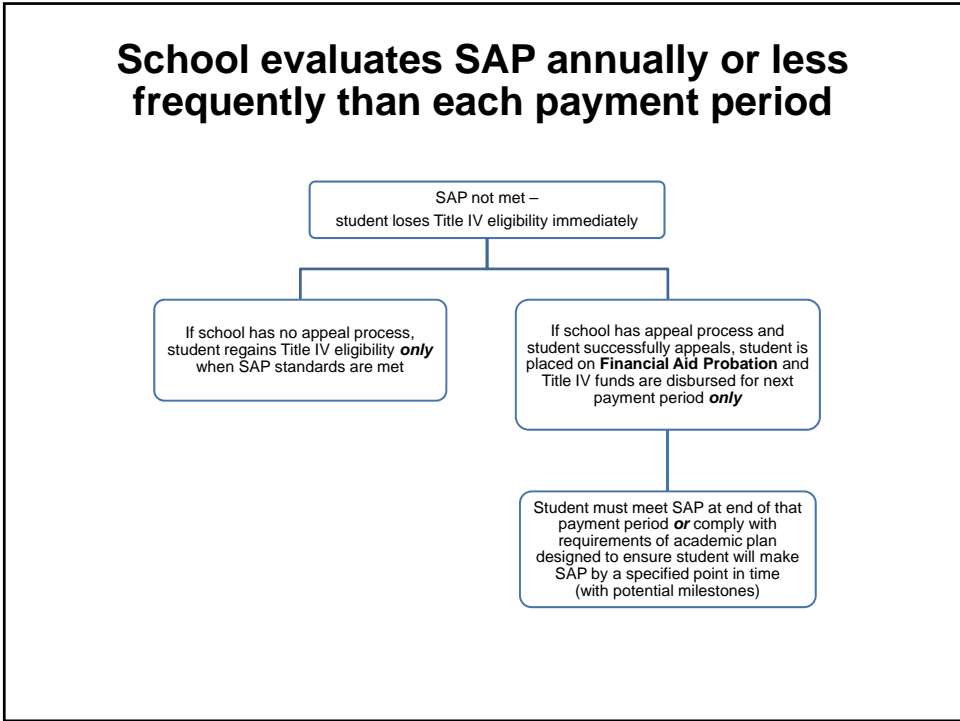


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- *Financial aid probation* can be granted only if the school:
  - Determines that the student should be able to meet the school's SAP standards by the end of the subsequent payment period; **or**
  - Develops an academic plan for the student that, if followed, will ensure the student is able to meet the school's SAP standards by a *specific point in time* (with potential milestones).


§668.34(c) and (d)





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- A student’s academic plan must include:
  - Steps needed to meet SAP standards
  - Review of progress at each SAP evaluation
  - A specified point in time by which SAP standards must be met

§668.34


## SAP



- Schools must:
  - Notify students of the results of SAP evaluations that impact their Title IV eligibility
  - Describe the specific steps, basis, and information required to appeal, if the school has an appeal process
  - Describe how a student not making SAP may regain Title IV eligibility, regardless of whether school has an appeal process

§668.34(a)(9)-(11)



## SAP discussion question



- A school's current SAP policy uses the term "suspension" to mean the same thing as ED's use of the term "financial aid probation." Can the school continue to use its current terminology?



## SAP discussion question



- Is a school allowed to have different SAP evaluation periods on a student-by-student basis?



## SAP discussion question



- Is a school required to have an appeal process as part of its SAP policy?



## SAP discussion question



- If a school has an appeal process, can a student appeal multiple times?



## SAP discussion question



- Is a school required to develop an academic plan for a student who does not meet SAP?



## SAP discussion question



- What might be included in an academic plan?



## Program Integrity resources



- *TG Online*—Program Integrity Final Rules
  - TG resources
    - One-page summaries
    - *Shoptalk* articles
    - Flowcharts
  - TG Tools
    - New Regulations Roadmap
    - Compilation: Overview of 14 Program Integrity Topics


<http://www.tgslc.org/policy/integrity-rules.cfm>



## Program Integrity resources TG™


- *TG Online—Program Integrity Final Rules (cont.)*
  - Department of Education resources
    - *Federal Registers*
    - Dear Colleague Letters
    - 2010 FSA Conference training modules
    - 2011 Regulatory Update workshop handouts
  - Industry resources
    - “Side-by-side” analysis document

<http://www.tgslc.org/policy/integrity-rules.cfm>




## FSA Assessments resource TG™

<http://ifap.ed.gov/qahome/fsaassessment.html>



The screenshot shows the 'FSA Assessments' page from the Quality Assurance Program. It features a navigation menu on the left with categories like 'Home', 'Joining the QA Program', 'Tools for Schools', 'Training & Guidance', and 'Recent'. The main content area is titled 'FSA Assessments' and includes an introductory paragraph and a list of assessment topics organized into four columns: Students, Schools, Managing Funds, and Innovations. At the bottom, there are links for 'FOIA | Privacy | Security | Notices' and 'Whitehouse.gov | USA.gov | ED.gov'.



## Questions?

This presentation is available for download at  
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