

Most Frequently Asked Questions from NASFAA's Webinar SAP: Basics and Beyond April 22, 2020



The following are answers to the most frequently asked questions presented during the webinar. You may search or browse the [AskRegs Knowledgebase](#) for answers to any follow-up questions you may have and/or submit them as AskRegs questions. For more guidance on the CARES Act and associated Higher Education Emergency Relief Fund (HEERF), go to [NASFAA's Coronavirus \(COVID-19\) Web Center](#).

Question	Answer
Qualitative Measure	
1. If, for academic purposes, a student must have a 2.00 grade point average (GPA), can we still round for satisfactory academic progress (SAP) purposes? Would a 1.95 GPA be acceptable for SAP, but not for academic purposes?	No. This would effectively make your SAP policy less strict, rather than the same as or stricter than, the policy for non-Title IV aid recipients. See 34 CFR 668.34(a)(1) .
2. The school's SAP policy currently stipulates a minimum 2.0 GPA. If the nursing program requires a minimum 2.5 GPA, does this minimum 2.5 GPA pertains only to our nursing students to maintain SAP, or must this GPA apply to all students, regardless of program?	Schools may have one minimum standard that generally applies to all students for the purpose of continuing to qualify for Title IV aid. However, if a student's program of study requires a higher GPA to meet SAP standards, students in that program must meet the higher standard. Different SAP policies may apply to different categories of students. See 668.34(a)(2) and p. 1-12 of the 2019-20 FSA Handbook .
3. For schools which moved to pass/fail grading for this term (and did not previously use pass/fail grading), what would be used as the comparative qualitative measurement for SAP if they will not be assigning a numeric GPA value?	Typically, pass/fail courses do not affect the student's GPA, but the courses count toward the quantitative measure. There is no one way to handle pass/fail, credit/no credit, or any of the similar variations. Some schools do not count the pass but account for the fail. How these types of grades are handled is up to the discretion of the institution. Even if this is a school's first time moving to pass/fail, credit/no credit, or a similar variation, how those grades are factored into the SAP calculation must be addressed in the school's SAP policy.
4. Due to COVID-19, the school has given students the option of sticking with a letter grade or selecting a pass/no pass grade (this selection is by class, so students can have both). Pass is assigned in place of an A, B, or C and credit given. A "no pass" will be given in place of a D or F grade and no credit given. Neither grade impacts GPA. How should we handle these classes when calculating SAP?	How pass/no pass grades impact students must be addressed in your SAP Policy. Guidance from the U.S. Department of Education (ED) indicates that a school does not have to factor pass/fail courses into the GPA measurement, "as long as the course is factored into the quantitative measurement." This guidance can be found on slide 42 of the 2018 FSA Training Conference session, Understanding Your Satisfactory Academic Progress Policy . For students with a mix of pass/fail courses and letter grades, all courses would count in the quantitative measure, but courses for which a pass/fail grade is given would be included in the qualitative component only if the school's policy indicates that it should be included.
5. Once an incomplete is changed to a letter grade, do you recalculate SAP then or wait until the end of the term?	The letter grade would be included in the next regular SAP evaluation.

Question	Answer
Quantitative Measure and Maximum Timeframe	
6. Can you confirm which of the SAP areas can be rounded up?	Pace and GPA can be rounded. Maximum timeframe cannot. See AskRegs Knowledgebase Q&A, Can We Round the Quantitative (Pace) and Qualitative Measures When Calculating SAP?
7. Can you explain the alignment of timeframe and pace?	Divide 1.0 or 100 percent (of the program length) by the maximum timeframe, and that gives the pace required to remain in alignment with the school's maximum timeframe standard. If the maximum timeframe is 125 percent, the decimal version of that is 1.25. $1.0 \div 1.25 = 0.8$. If the school's maximum timeframe is 125 percent (more stringent than the regulatory minimum of 150 percent), it cannot set a pace of 67 percent ($1.0 \div 1.5 = 0.6667$). This would be an example of maximum timeframe and pace being out of alignment. If a student only successfully completed 67 percent of their courses every term, the student would take 150 percent of their program to complete, not 125 percent. For additional information, see AskRegs Knowledgebase Q&A, How Can a School Ensure Pace of Progression and Maximum Timeframe in Its SAP Policy Are Properly Aligned?
8. Can schools have a graduated scale for the quantitative component?	Yes. A school may have a graduated standard so long as it allows students to reach the school's standards for completion of the program within the maximum timeframe for their program. See AskRegs Knowledgebase Q&A, Can an Institution Have a Graduated Standard for Pace in Its Satisfactory Academic Progress Policy?
9. Do pass/fail grades affect the quantitative component?	Yes. Courses that are failed count as attempted, but not completed, when calculating the quantitative component.
10. Can a school have a quantitative measure by school year and not cumulative?	No. While a school could incorporate an academic year or payment period calculation of pace in addition to the cumulative pace requirement, it cannot take the place of the cumulative pace requirement. See 668.34(a)(5)(ii) .
Evaluations and Appeals	
11. Can a school evaluate undergraduate students for SAP every payment period and evaluate graduate students just once in the academic year?	Yes, a school may have a different policy for different categories of students, so long as the treatment is consistent across the category. See 668.34(a)(2) .
12. How many SAP appeals is a student allotted per undergraduate degree?	This would be determined by your institution's SAP policies and procedures. It is not prescribed by ED. See the following from ED's Program Integrity Q&A, Satisfactory Academic Progress : "APP-Q1: How many times may a student appeal a failure to make SAP? APP-A1: The regulations do not limit the number of times a student may appeal. If an institution permits appeals, the regulations (at 34 CFR 668.34(a)(9)) specify what the policy

Question	Answer
12. (continued)	must include. The policy must describe how the student may reestablish his or her eligibility to receive Title IV aid and the basis on which a student may file an appeal (such as the death of a relative, an injury or illness of the student, or other special circumstances). The institution's policy must also describe the information the student must submit to support the appeal, including why the student failed to make satisfactory academic progress, and what may have changed in the student's situation that will allow the student to demonstrate SAP at the next evaluation. If the student appealed on the basis of one circumstance and wanted to appeal again based on the same circumstance, the student would have to provide information about what has changed to permit the student to make satisfactory progress at the next evaluation. In addition, an institution may decide to limit the number of times it will allow a student to appeal. [Guidance issued 8/26/2011]"
13. If a student has successfully appealed and is on financial aid probation for one semester, can we extend the appeal for another semester?	No. Financial aid probation is limited to one payment period. If the student is not meeting SAP standards after that payment period, the student is ineligible unless they file another successful appeal. See 668.34(c)(2)(ii) and 668.34(d)(2) .
14. If a school operates on trimesters and all students do not attend summer, when is SAP evaluated? Generally, we evaluate every payment period.	If the school evaluates SAP at the end of each payment period, it must be done at the end of each payment period, even though summer is an optional term.
15. If a student left school and was notified of the need to appeal their SAP status but never completed it, will the student need to do so once they return to the institution?	Generally, yes. Temporarily leaving the institution is not a way to improve the student's SAP status. The student would need to successfully appeal before continuing to receive Title IV aid. However, if the student transfers in credits which would help the student meet SAP standards, this could either be a part of the appeal or the school could run SAP utilizing the transfer credits without an appeal.
Regaining Eligibility	
16. We evaluate SAP once per year after spring term. For students that do not appeal, but improve their standing prior to the end of the next spring, are we able to remove them from SAP if they self-identify? We have students who will take summer courses and let us know when their new grades are in. If meeting SAP, we would remove them without requiring an appeal. Is that acceptable?	Yes. The student would be eligible for Title IV aid once the student meets minimum satisfactory academic progress (SAP) requirements as defined by your institution's SAP policy. The student would regain eligibility even if the timing occurs at the end of a payment period prior to the payment period in which SAP is evaluated. 668.34(a)(9)(i) requires an institution to include in its SAP policy an explanation on how a student who does not meet SAP standards may re-establish eligibility to receive Title IV assistance if the student's appeal is denied. 668.34(a)(10) describes the same requirement for institutions that do not permit appeals. The preamble to the proposed rules in the Federal Register, 6/18/10 , page 34822, includes a statement that a student would re-establish eligibility once the student has an academic standing consistent with SAP requirements.

Question	Answer
16. (continued)	The information provided to students regarding the institution's SAP policy should clearly indicate that a student may regain Title IV eligibility by raising his pace of completion or cumulative grade point average (GPA) to the level required by the SAP policy. The policy should also specify how such students would be identified. This should clear up any confusion by students, and within the financial aid office, as to when and how students regain Title IV eligibility.
17. If our school has modules and a student is meeting SAP at the end of the first module, do they regain eligibility for the entire payment period?	No. SAP requires an evaluation at the end of a payment period. A module within a payment period cannot be the point of an evaluation, either for losing or regaining eligibility.
Flexibilities Due to COVID-19	
18. If a student was on financial aid probation with an academic plan and due to a change in grading to pass/fail, they were unable to reach the 2.0 GPA, can they appeal again?	Yes. The March 5, 2020 Electronic Announcement allows, "circumstances related to an outbreak of COVID-19, including, but not limited to, the illness of a student or family member, compliance with a quarantine period, or the general disruption resulting from such an outbreak may form the basis of a student's SAP appeal even if not specifically articulated in the institution's SAP policy" to be considered.
19. Our school is considering pass/fail but that won't count in the GPA, and if we understand correctly, COVID-19 flexibilities state that pace doesn't have to be made. So how do we review SAP? It seems it would be a frozen semester and not beneficial to students on probation or needing a 2.0 to graduate.	The flexibility granted in the CARES act does not eliminate the need to meet the qualitative or quantitative standards of SAP, but it does give the school options for whether or not the attempts will be considered in the quantitative component for students who are unable to complete their coursework. For students who move to all pass/fail courses and the school does not count these courses in the GPA, then essentially, the qualitative component of SAP would remain unchanged from the prior term. When deciding to move to pass/fail, it is important to think about the possible outcome for students. Some schools have elected to give students a choice in whether they continue with letter grades or if they would like to move to pass/fail for a course or courses. Whatever the school decides, it must be documented in your SAP policy.
20. For a student who attempted, but did not complete courses because of a COVID-19-related circumstance, does the student have to be withdrawn to not count those courses in the quantitative calculation? Does it make a difference if the student is given an "I" (incomplete) grade?	<p>The CARES Act states, "[n]otwithstanding section 484 of the Higher Education Act of 1965 (20 U.S.C. 1091), in determining whether a student is maintaining satisfactory academic progress...an institution of higher education may, as a result of a qualifying emergency, exclude from the quantitative component of the calculation any attempted credits that were not completed by such student without requiring an appeal by such student." This is an option, not a requirement.</p> <p>Additional guidance is forthcoming from ED on the implementation of the flexibilities afforded by the CARES Act. Stay tuned to <i>Today's News</i> for updates.</p>