

Satisfactory Academic Progress: Basics & Beyond

April 22, 2020





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April 2020

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Introductions • Tiffany Gibbs > Compliance Products Manager > NASFAA • Lissa Powell > Training Content and Presentation Specialist > NASFAA

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Introductions

- Zita Barree
 - Director of Financial Aid, Office of Financial Aid
- Hampden-Sydney College, Hampden-Sydney, VA



- Program Specialist, Office of Financial Aid
- Towson University, Towson, MD



- Assistant Director, Student Financial Services
- Johns Hopkins University, Baltimore, MD







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Agenda

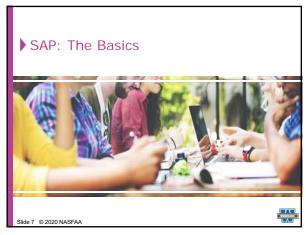
- · Review the basics of SAP
 - Qualitative measure
 - > Quantitative measure
 - > Maximum timeframe
 - > Evaluation
- Discuss the "beyond" of SAP
 - > Remedial coursework
 - > Incompletes
 - > Withdrawals, and more!
- · Address the CARES Act

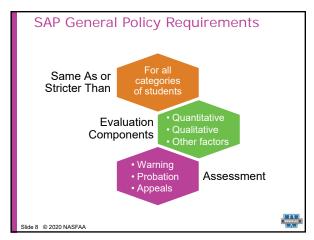
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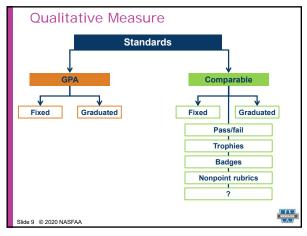


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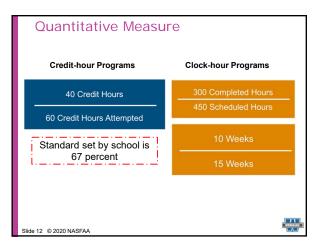




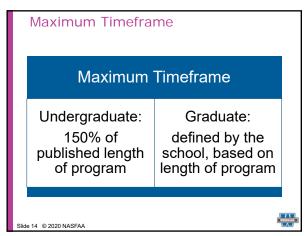
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Quantitative Measure		
Pace – A measure of progress toward completion of a program of study within the maximum timeframe allotted for the program		
Credit-hour Programs	Clock-hour Programs	
Cumulative Credit Hours Completed	Successfully Completed Hours	
	Scheduled Hours	
Cumulative Credit Hours Attempted	Weeks needed to successfully complete hours attended	
	Actual weeks attended	
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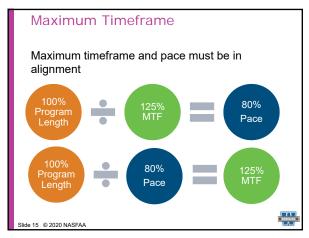


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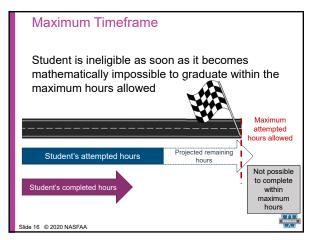




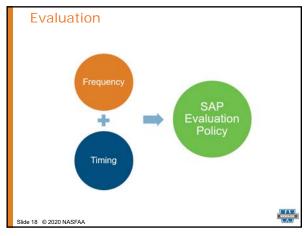
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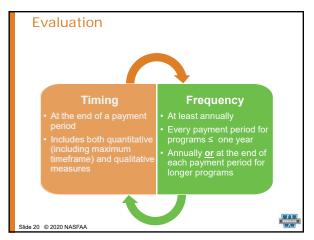




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Evaluation	
Timing • At the end of a payment period • Includes both quantitative (including maximum	
timeframe) and qualitative measures	CAP CONTRACTOR OF THE CONTRACT

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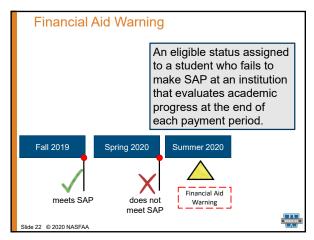


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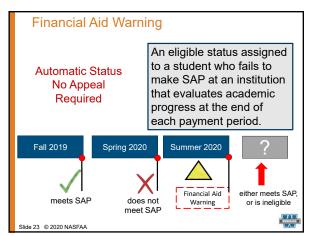
Clock-hour program options for evaluation: • At the point when the student's *scheduled* clock hours for the payment period have elapsed, regardless of actual attendance; • At the point when the student has *attended* scheduled clock hours; or • At the point the student *successfully completes* the scheduled clock hours for the payment period.



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Financial Aid Probation			
Definition	Aid eligibility reinstated due to a successful appeal*		
Required Student Action	File SAP appeal* with school		
Eligibility for Title IV Aid	Aid may be paid for the subsequent payment period		
*Schools are not required to allow SAP appeals.			
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SAP Appeals	
Conditions and Circumstances	Define acceptable reasons No regulatory limits on appeals
Documentation	Student's circumstances Actions taken on an appeal
Processing SAP Appeals	Steps to follow Making appeal decisions
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Academic Plans

- · Long-range plan for success
 - > Tailored to the student's unique needs
 - > Appropriate checkpoints and milestones
 - > Specific point in time for meeting SAP standards
 - > May extend beyond 150% maximum timeframe
- · May be granted only after successful appeal
- May follow or replace financial aid warning or probation

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Academic Plans

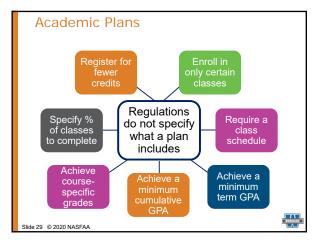
- School reviews progress after first payment period
- Subsequent reviews may align with school's SAP review cycle or happen more often
- Failure to follow the plan results in loss of Title IV eligibility

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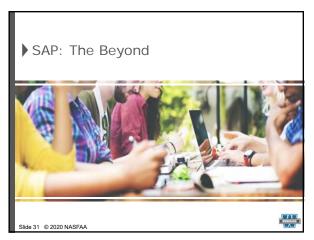




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Remedial Coursework

Regulation - 34 CFR 668.34(a)(ii)

"(ii) An institution calculates the pace at which the student is progressing by dividing the cumulative number of hours the student has successfully completed by the cumulative number of hours the student has attempted. In making this calculation, the institution is not required to include remedial courses;"

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Incomp	oletes			
"(6) The	on – 34 CFR 668.34(a)(6) policy describes how a student's GPA and			
	inpletion are affected by course incompletes, ils, or repetitions, or transfers of credit from			
	utions. Credit hours from another institution cepted toward the student's educational			
	ust count as both attempted and completed			
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1				
Incomp	Grade(s) assigned in place of a			
	standard grade when: • Student is unable to fulfill course	-		
	requirements; • Granted an extension of time to			
	complete coursework; and			
	 Assignment of the incomplete grac is in accordance with school policy 			
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Withdra	awais			
• Regula	tion – 34 CFR 668 34(a)(6)			

- R 668.34(a)(b)
- > Schools cannot disregard withdrawals that occurred after the add/drop period
- > Courses dropped within add/drop period do not have to be factored into satisfactory academic progress calculations

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Regulation – 34 CFR 668.34(a)(6) It is <u>not</u> considered academic amnesty to use any of the following methods when dealing

with repeated coursework. The school may

> All grades;

Repetitions

- > An average of grades; or
- > The highest grade, etc.

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Transfer Credits

• Regulation - 34 CFR 668.34(a)(6):

"(6) The policy describes how a student's GPA and pace of completion are affected by course incompletes, withdrawals, or repetitions, or transfers of credit from other institutions. Credit hours from another institution that are accepted toward the student's educational program must count as both attempted and completed hours;"

For clock hour programs, this results in a reduction in the number of hours remaining to complete the program at the new school

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Transfer Credits – Consortium Agreements

- School policy must spell out if credit hours or clock hours earned from another school are considered transfer hours
 - If considered transfer hours, those credit hours or clock hours must be factored into quantitative measure and school has discretion with qualitative measure

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Transfer Credits – Non-accepted Credits	
From Program Integrity Q&A, Satisfactory Academic Progress	s:
"SAP-Q6: The SAP regulations require that credit hours that	-
are accepted toward the student's educational program count	
as both attempted and completed when calculating pace for	
SAP purposes. Can an institution's policy include non-accepte	ed
credits as attempted credits for purposes of this calculation?	
SAP-A6: The SAP regulations do not address non-accepted credits. The treatment of these credits would be up to the	
institution. [Guidance issued 8/26/2011; revised 11/18/2011]"	
institution. [Guidanoe issued 0/20/2011, Tevised 11/10/2011]	
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Transfer Credits – Late Transcripts	
Scenario: What if a transcript comes in the	
middle of the term?	
Answer: Any transfer hours that are accepted	
toward the student's program would be factored	
in the at the next SAP evaluation.	
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Transfer Credits – Changes in	
Major/Program	
Transfer and of the same in marion on the marion	
Treatment of changes in major or program is at the discretion of the school and must be	
spelled out in policy	
 Schools can limit the number of times students change majors 	
Schools can limit the timing of a change in major	
> Schools can limit the timing of a change in major	
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Multiple Programs

- If a student is enrolled in two different programs with the intent of earning two distinct credentials, SAP and all components are calculated separately for each program
- A student can be meeting SAP for one program and not the other

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Prior Periods

- If a student was not receiving Title IV aid before, but applies for aid and is not meeting SAP, it is possible the student would have to appeal right away.
 - Example from Session #6 of the 2019 FSA Conference: "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 does impact TIV eligibility in future terms."

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Grade Changes

- SAP does not have to be recalculated for prior periods due to retroactive grade changes
- Changes can be picked up in the next formal evaluation

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March 5, 2020 Electronic Announcement

"Satisfactory Academic Progress (SAP)

An institution's SAP appeal policy (34 CFR § 668.34(a)(9)) must, among other things, describe the basis on which a student may file an appeal: the death of a relative, an injury or illness of the student, or other special circumstances.

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."

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The CARES Act

Sec. 3509 Satisfactory Academic Progress
"Notwithstanding 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."

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The CARES Act

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The CARES Act

In the Act, a "qualifying emergency" is defined as:

"(A) a public health emergency related to the coronavirus declared by the Secretary of Health and Human Services pursuant to section 319 of the Public Health Service Act (42 U.S.C. 247d);

(B) an event related to the coronavirus for which the President declared a major disaster or an emergency under section 401 or 501, respectively, of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5170 and 5191); or (C) a national emergency related to the coronavirus declared by the President under section 201 of the National

Emergencies Act (50 U.S.C. 1601 et seq.)."

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Coronavirus (COVID-19) Web Center

This web center has been created to keep NASFAA members and the financial aid community updated on pertinent news related to the coronavirus (COVID-19). This web center is updated daily with new items marked as *NEW*.

NASFAA Articles & Statements

- * *NEW* Southeast Tech Puts Unused Medical Equipment to Good Use
 * Lawmakers Push Relief From Withheld Tax Refunds for More Student Borror During COVID-19 Outbreak
- American Council on Education Simulates Distribution of CARES Act Emergency
- ED Halts Collections on Defaulted Student Loans Due to COVID-19
- Universities Get Creative With Emergency Funds for Students Displaced by
- NASFAA Members Share Remote Experiences, Best Practices During COVID-19
- Private Student Loan Borrowers to See Some Reprieve Amid Coronavirus Relief Senate, House Leaders Negotiate Toward Third COVID-19 Package

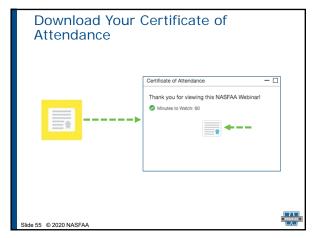
https://www.nasfaa.org/covid19







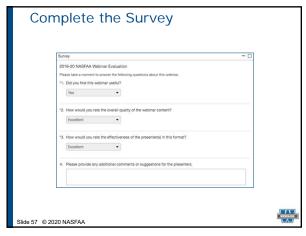
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Tune In Next Time! Return of Title IV Funds Spotlight: Advanced Concepts May 13, 2020 4:00 p.m. ET NASFAA Policy Update May 19, 2020 4:00 p.m. ET

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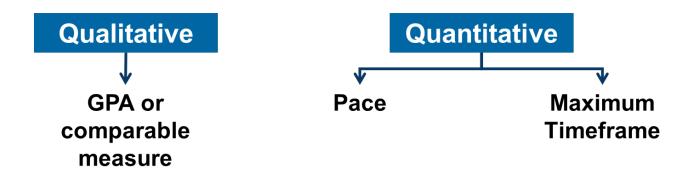
Thank you for joining us!	
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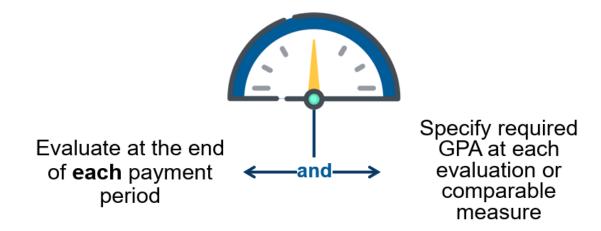
Satisfactory Academic Progress Policy Basics



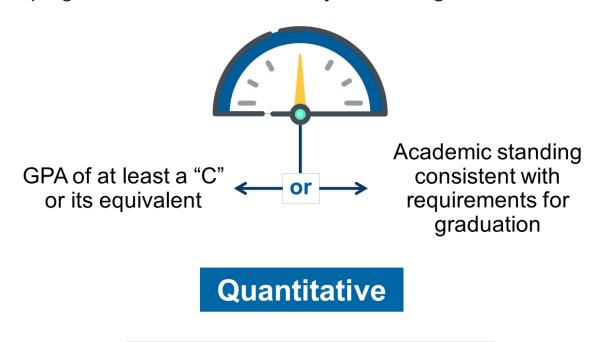
Students must meet both Qualitative and Quantitative standards to remain eligible for Title IV aid

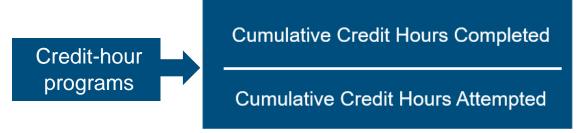
Qualitative

Programs of one academic year in length or less must:



By the end of the second year, students enrolled in programs of more than two AY years in length must have:





Successfully Completed Hours

Scheduled Hours

Weeks needed to successfully complete hours attended

Actual weeks attended



Maximum Timeframe

Undergraduate:

150% of published length of program

Graduate:

Defined by the school, based on length of program

Fixed or Graduated

Transfer credits accepted count in both completed and attempted hours

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Glossary

Academic amnesty: A process offered by some institutions which allows students to have credits attempted and grades earned in previous terms excluded from the calculation of the student's grade point average (GPA). No provisions for academic amnesty are made in FSA regulations.

Academic plan: A plan developed by the institution and the student to ensure that the student is able to meet the institution's satisfactory academic progress (SAP) standards by a specific point in time.

Appeal: A process by which a student who is not meeting satisfactory academic progress standards or other eligibility requirements petitions the school for reconsideration of his or her eligibility for the Title IV programs.

Financial aid probation: A status assigned by an institution to a student who fails to make SAP and who has appealed and has had eligibility for aid reinstated.

Financial aid warning: A status assigned to a student who fails to make SAP at an institution that evaluates academic progress at the end of each payment period, under which the student may continue to receive Title IV aid for one additional payment period.

Grade point average (GPA): A measure of a student's academic achievement at an institution, calculated by dividing the total number of grade points earned by the total number of credits or hours.

Graduated: Divided into or marked with intervals with increasing difficulty.

Maximum timeframe: Refers to-

- For an undergraduate program measured in credit hours, a period defined by the school that is no longer than 150 percent of the published length of the educational program, as measured in credit hours attempted;
- For an undergraduate program measured in clock hours, a period that is no longer than 150 percent of the
 published length of the educational program, as measured by the cumulative number of clock hours the
 student is required to complete and expressed in calendar time; and
- For a graduate program, a period defined by the institution that is based on the length of the educational program.

Pace: A measure of a student's progress toward completion of his or her program of study within the maximum timeframe, which compares hours earned to hours attempted or scheduled, expressed as a fraction.

Payment period: A school-determined length of time for which financial aid funds are paid to a student. For programs using standard academic terms (semesters, trimesters, or quarters), and for programs using substantially equal nonstandard terms, a payment period is equal to the term. For programs not using academic terms, schools must designate at least two payment periods within an academic year that meets all applicable regulations.

Period of enrollment: The period coinciding with one or more academic terms established by the school for which institutional charges are generally assessed, such as a semester, trimester, or quarter in weeks of instructional time; an academic year; or the length of the program of study in weeks of instructional time. Also referred to as the loan period.

Qualitative component: The specified GPA, or other comparable assessment measured against a norm, that a student must have at each SAP evaluation.

Quantitative component: The pace at which a student must progress through his or her program of study to ensure that he or she will graduate within the maximum timeframe.

Satisfactory academic progress (SAP): The progress required of a financial aid recipient in acceptable studies or other activities to successfully complete a program of study within a specified timeframe. SAP contains both a grade, or its equivalent (qualitative), and pace (quantitative) measure. It also must be the same as or stricter than academic standards used for students not receiving Title IV aid.

Satisfactory academic progress (SAP) policy: An institution's policy for determining whether an otherwise eligible student is maintaining SAP in his or her educational program in order to receive assistance under the Title IV programs.

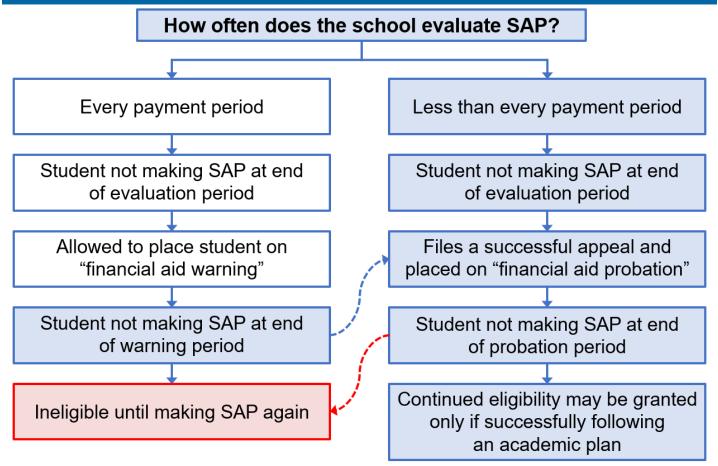


Satisfactory Academic Progress (SAP) Policy Checklist

$\overline{\checkmark}$	Use this checklist to ensure your SAP policy contains all required elements.
	The financial aid SAP policy is published and made readily available to current and prospective students.
	The financial aid SAP policy is the same or stricter than the school's academic progress policy for those not receiving Title IV funds.
	The financial aid SAP policy is applied consistently to all students within each educational program as well as within allowable categories of students (e.g., full time, part time, undergraduate, graduate, etc.).
	If the school has a comprehensive transition and postsecondary (CTP) program, SAP is defined in the context of the program.
	Policy indicates the timing and frequency of SAP reviews.
	The school reviews all courses taken toward a student's program of study, regardless of any academic amnesty policy.
	Students are notified when ineligible for Title IV aid due to not meeting financial aid SAP standards.
	There is a requirement of the equivalent of a "C" average or a standing consistent with graduation requirements at the end of the second year for all Title IV recipients enrolled in a program longer than two academic years in length.
	SAP policy includes a qualitative and quantitative component.
	If your school has an appeal process, students are notified and provided specific information for the successful filing of the appeal.
	The effect of course incompletes, withdrawals, nonattendance, repeated coursework, changes in program, additional degrees, and transfer hours are addressed in your SAP policy.
	SAP policy includes information on how audited coursework may affect pace and maximum timeframe.
	Policy may set a limit on the number of times a student may change their program or major and change academic progress if prior credits are not included in SAP determination.

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Using Warning or Probation Status



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Considerations for the Use of Academic Plans in Satisfactory Academic Progress Appeals

Use this worksheet to help determine if your institution can effectively implement the use of academic plans in your satisfactory academic progress (SAP) appeal policy. Keep in mind that SAP is an institutional requirement under 34 CFR 668.16(e) of the General Provisions regulations, so you will need to involve all applicable campus offices in the decision-making process. A majority of "Yes" responses indicates you should be able to effectively implement the use of academic plans. "No" responses indicate areas where changes, additional resources, and/or more research is needed prior to implementation.

1. Buy-in from other institutional offices

Effective implementation of academic plans requires the buy-in and continued involvement of other campus offices such as academic advisors, counseling or resource centers, and the registrar. Staff in these offices can assist the financial aid office in developing individualized academic plans to help get students back on track to meet SAP requirements. a. Are staff from the appropriate offices willing to be involved in the development of ☐ Yes ☐ No academic plans? b. Are staff from other offices willing to assist in counseling students regarding ☐ Yes academic plans? c. Are staff from other offices familiar with the institution's SAP policies? ☐ Yes Comments: 2. Available resources Use of academic plans also requires adequate resources. Proper development will require substantial staff time, additional training of staff, more time for student counseling, and the development of specialized correspondence. a. Can the institution devote the necessary staff time to the use of academic plans? ☐ Yes b. Can the institution adequately train involved staff in the effective use of academic □ No ☐ Yes plans? c. Is the institution willing to develop customized correspondence for students who ☐ No ☐ Yes will utilize academic plans? Comments:

3. System of monitoring compliance

A necessary component of the use of academic plans is an adequate system to monitor student compliance. A monitoring system will require additional staff effort, including nonfinancial aid office staff, and possibly system adjustments if your evaluation process is automated. a. Does the institution have the staff capacity (from all involved offices) to effectively ☐ Yes ☐ No monitor compliance with individualized academic plans? b. Can the institution monitor compliance in an efficient manner? ☐ Yes c. If SAP evaluation and tracking is automated, can the system be modified to monitor compliance with individualized academic plans? d. Do all institutional staff members who play a role in monitoring a student's SAP ☐ Yes have access to all of the information needed to do so, and with sufficient levels of information security (e.g., financial aid office staff, registrar's office staff, academic advisors/counselors)? Comments: 4. Nature and needs of student body Academic plans are tool to assist students in meeting your SAP standards. An institution should use this option if it believes students will benefit from this form of intervention. a. Would certain categories of students (e.g., underclassmen) benefit from the use ☐ Yes of academic plans? b. Historically, do students have difficulty meeting SAP standards? ☐ Yes c. Do students respond well to similar types of intervention utilized by the school? Comments:



Elements of Satisfactory Academic Progress Appeals **Policies and Procedures**

The following table describes various elements of satisfactory academic progress (SAP) appeal policies and procedures, which are part of an institution's SAP policies and procedures. It may be used in conjunction with NASFAA's Policies and Procedures Builder, available online at www.nasfaa.org.

SAP Appeal Circumstances	
Policies	Procedures
 Provide general descriptions of circumstances that warrant consideration of a SAP appeal, as well those that are not acceptable. State which elements of the SAP policy are appealable (e.g. pace, maximum timeframe) and not appealable. Indicate that a SAP appeal is required to be placed on financial aid probation. Indicate that a student may be placed on financial aid probation for only one payment period, at the end of which the student is expected to meet SAP standards. 	 Describe the general process for reviewing the reasons for a SAP appeal request, including financial aid probation considerations. Describe the process for considering any exceptions to the policies.
SAP Appeal Process	
Policies	Procedures
 Provide a description of how a student makes a request (e.g., in writing). Must the student sign the appeal request? Include information on how the institution utilizes technology in the process (e.g., use of an online request form). Is there a deadline by which students must submit appeals? Which staff is responsible for reviewing appeals? Describe any limits on the number of appeals a student may submit. Note the institution's policy on contesting a denied SAP appeal. 	students must complete?How are requests routed to the appropriate staff?
SAP Appeal Documentation	
Policies	Procedures
 Provide examples of acceptable documentation. Detail any documentation requirements for students' ability to meet SAP standards after the subsequent payment period. Include consequences of failing to submit requested documentation. Include any deadlines for submitting documentation. 	 How does the financial aid office notify students of documentation requirements? What actions does the institution take when students submit documentation late?

Academic Plans				
Policies	Procedures			
 Provide a general description of the situations for which you will utilize academic plans, as well as situations for which plans will not be used. Describe how academic plans will or will not be used for various categories of students. State whether or not the use of academic plans will be limited based on elements of the SAP policy. Discuss your policies for the development of academic plans. Describe your policies for monitoring student compliance. Describe the contact students on academic plans must have, if any, with campus offices and academic advisors/counselors. 	 How will academic plans be developed? Which staff is responsible for developing academic plans and monitoring compliance? How will students be notified regarding their academic plans and the requirements of the plans? How will students be notified regarding their compliance with academic plans? How will the use of academic plans fit into the SAP evaluation process? 			
Communication with Students				
Policies	Procedures			
 Address whether the student must have contact with the financial aid office before submitting an appeal. Discuss what contact, if any, the financial aid office will have with the student during the appeal process. 	 What type of contact does the student need to have with the financial aid office? Is an appointment with a counselor required? If the financial aid office will be in contact with the student during the process, how frequent is the contact? Is it at predetermined points? 			
Consumer Information				
Policies	Procedures			
 Describe the information you publish regarding SAP appeals. Discuss how revisions to appeal policies impact previously released information. 	How is information about SAP appeals disseminated?How are changes to policies publicized?			



Satisfactory Academic Progress: Basics and Beyond **Resources and References**

Reference

34 CFR 668.34

https://www.nasfaa.org/Part 668 General Provisions#subc66834

2019-20 FSA Handbook, pp. 1-12 to 1-18

http://ifap.ed.gov/sites/default/files/attachments/2019-08/1920FSAHbkVol1Master.pdf

Resources: Coronavirus (COVID-19)

The Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Pub. L. No. 116-136 https://www.congress.gov/116/bills/hr748/BILLS-116hr748enr.pdf

Electronic Announcement, 4/3/2020

Subject UPDATED Guidance for interruptions of study related to Coronavirus (COVID-19) https://ifap.ed.gov/electronic-announcements/040320UPDATEDGuidanceInterruptStudyRelCOVID19

Electronic Announcement, 3/5/2020

Subject: Guidance for interruptions of study related to Coronavirus (COVID-19)

https://ifap.ed.gov/electronic-announcements/030520Guidance4interruptionsrelated2CoronavirusCOVID19

U.S. Department of Education COVID-19 ("Coronavirus") Information and Resources for Schools and School Personnel

https://www.ed.gov/coronavirus?src=feature

NASFAA's Coronavirus (COVID-19) Web Center https://www.nasfaa.org/covid19

NASFAA Recorded Webinars

- April 17, 2020: COVID-19 and Federal Student Aid: The Latest Information
- April 2, 2020: Follow-Up Webinar COVID-19 and Federal Student Aid: What We Know
- March 17, 2020: COVID-19 and Federal Student Aid: What We Know
 - Transcript of Q&A Segment From March 17 Webinar

Resources: Satisfactory Academic Progress

NASFAA's Student Aid Index, Satisfactory Academic Progress https://www.nasfaa.org/StudentAidIndex?Satisfactory Academic Progress SAP

Session #6: Understanding Your Satisfactory Academic Progress Policy, 2019 FSA Training Conference for Financial Aid Professionals

https://fsaconferences.ed.gov/conferences/library/2019/2019FSAConfSession6.pdf

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What's next?

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Updating FAFSA Data: When and Why	10/23/2019
Verification 2020-21	11/19/2019
What the Pell Am I Supposed to Do With These Enrollment Status Changes?	12/11/2019
Policy Update*	12/17/2019
Verification 2020-21: Follow-Up Webinar	01/22/2020
Financial Literacy	02/12/2020
Enrollment Management for Financial Aid Administrators	03/19/2020
Grad/Professional School Townhall*	03/25/2020
Satisfactory Academic Progress: Basics & Beyond	04/22/2020
Return of Title IV Funds Spotlight: Advanced Concepts	05/13/2020
Policy Update*	05/19/2020
Direct Loan Spotlight	06/03/2020

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