Ensuring compliance with Satisfactory Progress

On the following pages you will find a sample Satisfactory Academic Progress (SAP) Policy for a program offered in clock hours. This policy provides for SAP evaluations at the point when students have completed each payment period based on actual hours of attendance. This suggested policy also provides for a monthly review of student progress which can be effective in identifying at risk students in their early stages of declining progress. Using an informal monthly review process can help prevent students from losing federal aid eligibility when the student ultimately arrives at a formal SAP evaluation point.

This sample policy uses federally required minimum standards of 67% attendance and a 2.0, or "C" average academic standard. If your attendance or academic/grade standards are different than these federal minimums, simply replace the percentages in this sample policy with your requirements when you are publishing your official SAP policy. The standards of your SAP policy must be designed so that students will meet your program's maximum time frame (MTF) as published in your policy.

Your required attendance percentage must also be consistent with your maximum time frame. For example, the maximum time frame for program completion based on federal guidelines is 150% of the normal time for program completion. Mathematically, a MTF of 150% is consistent with a pace of completion/attendance standard of approximately 67% (100 / 0.67). If your attendance standard is greater than 67%, you must adjust your MTF to be consistent with that attendance standard. A school that requires a minimum attendance pace of 80% would have a MTF of only 125% of the normal program length (100 / 0.80).

This policy has been submitted to and examined by the U.S. Department of Education's Third Party Servicer Oversight Group (USDE/TPSOG) in Kansas City, MO. Its content has been accepted by the USDE as being compliant with the requirements of federal statute and regulations.

Also, although this sample policy complies with the provisions of USDE regulations regarding the measurement of student progress, be certain that your policy meets any additional published requirements of your state and your accrediting agency.

GEMCOR, Inc.

Satisfactory Academic Progress (SAP) Sample Policy

Students are required to maintain satisfactory academic progress throughout their training to comply with institutional policy and to remain eligible for Title IV, HEA federal student financial assistance. Satisfactory academic progress (SAP) is measured in both quantitative terms (attendance), as well as qualitative terms (academics/grades). Students must meet the school's attendance standard and the academic standard on a cumulative basis (start date to evaluation date) to maintain eligibility for federal student financial assistance funds unless the student is on "Financial Aid Warning" or "Probation" as defined in this policy. In the event that an evaluation results in the determination that a student is not meeting the institution's attendance and academic standards, or that the student is not in compliance with the terms of an academic plan developed in accordance with this policy, the institution will notify the student of that determination.

Attendance Standard (Pace of Completion)

Students must successfully complete at least 67% of the hours they are scheduled to attend based on the student's enrollment agreement. Compliance with this standard shall ensure that the student is progressing toward completion of the program within the published maximum time frame. A student's pace of program completion is determined by the following formula using cumulative numbers of clock hours:

$$\frac{\text{Number of clock hours successfully completed as of the date the payment period ended}}{\text{Number of clock hours scheduled to be completed as of the date the payment period ended}}$$

For example, a student who is enrolled for 30 clock hours per week for 20 weeks would have a cumulative scheduled attendance of 600 clock hours. If the student successfully completed 450 of the 600 scheduled hours, his/her attendance pace would be 75.0% (450/600) and would be meeting the attendance requirement of this policy.

Academic Standard

Theory, practical, and lab/clinic exams and procedures that are graded will be based on the following scale:

Grading System		
95% - 100%	A	Excellent
85% - 94%	B	Above Average
75% - 84%	C	Satisfactory
Below 75%	D	Unsatisfactory/Fail

Students must maintain an academic average of at least 75% (C) or higher on a cumulative basis as of the date the payment period ended to meet the academic standards of this policy and be considered as making satisfactory academic progress.

Review and Evaluation Periods

Student progress will be reviewed by the institution on a monthly basis to identify students who may be at risk regarding satisfactory academic progress. At risk students will be counseled and will be advised regarding efforts to improve progress. Formal satisfactory academic progress evaluations, which determine continuing eligibility for federal student aid, will be calculated as of the date that the student completes each financial aid payment period. Completion of a payment period is considered to have occurred when the student has completed both the number of clock hours in the payment period, as well as the number of instructional weeks in the payment period. Students who meet the attendance and academic standards described herein will be considered to be making satisfactory academic progress until the next scheduled evaluation.

Financial Aid Warning

Students who fail to meet either of the two progress standards as determined by a SAP evaluation will be placed on Financial Aid Warning (FAW) status, and the student will remain eligible for federal student aid funds for the subsequent payment period. A student may not be placed on FAW for consecutive payment periods. At the end of the FAW period, the student must be meeting the published attendance and academic standards on a cumulative basis to be considered as making satisfactory academic progress and to remain eligible for further federal student financial aid.

Probation

Any student who fails to meet the published attendance and academic standards as a result of a SAP evaluation, and who is not eligible to be placed on Financial Aid Warning, is considered as not making satisfactory academic progress and is ineligible for federal student aid for the following payment period. A student may reestablish his or her federal aid eligibility by submitting a written appeal in accordance with this policy and, if approved by the institution, by being granted "Probation" by the institution. In the event the student submits a successful appeal and is granted probation, federal student aid eligibility will be reinstated for that payment period. Students who are granted probation as a result of a written appeal and institutional approval, must meet the institution's published attendance and academic standards on a cumulative basis at the next SAP evaluation, or must be in compliance with the terms of an academic plan established by the institution, in order to maintain eligibility for Title IV, HEA federal student assistance funds.

Appeals

Students who have been designated as not making satisfactory academic progress may appeal this determination with the institution based on mitigating circumstances. Mitigating circumstances may include the death of a relative, injury or illness of the student, or other special circumstances. The student's appeal must be made in writing to the academic dean or school director and must be received within 15 days of date that the institution notified the student of his or her loss of federal aid eligibility. The student's appeal must include documentation regarding the unusual or mitigating circumstances that caused the student to fail to meet the institution's standards as well provide information regarding what conditions have changed that would demonstrate that the student could re-establish satisfactory academic progress in the future. The institution will review the student's appeal and related documentation and its resulting decision will be final.

Reinstatements

Generally, most students who enroll in the school are considered to be making satisfactory academic progress during their initial payment period. Students who are returning to school after a temporary interruption are reinstated under the same SAP status as they had when their prior period of enrollment ended. Attendance and academic progress will be measured on a cumulative basis from the beginning of the period of enrollment through the date that each payment period has ended. See the section of this policy about "Course Repetitions" for further information.

Course Incompletes, Repetitions, and Non-Credit Remedial Courses

The institution does not offer grades of "incomplete" and accordingly, these have no impact on SAP. If a student withdraws from a program of study and re-enrolls in the same program within 180 days of withdrawal, the student is treated as returning to the same payment period that was in place when the student withdrew and must complete any clock hours for which the student previously received federal funding before being eligible for additional funding. A student who returns to a program after more than 180 days have elapsed since withdrawal may be eligible for federal aid for any classes the student must repeat to obtain academic credit. Students should meet with a financial aid advisor to discuss the conditions under which federal aid may be awarded for repeated courses. The institution does not provide non-credit remedial courses.

Reinstatement of Federal Financial Aid

Students who have lost eligibility for federal student aid may reestablish their eligibility for aid in accordance with the appeal provisions contained in this policy. Students seeking reinstatement of federal aid must also meet with the academic dean or school director. An academic plan may be developed by the institution and may include specific performance requirements that the student must successfully complete to maintain eligibility for federal student aid.

Maximum Time Frame

The normal time frames and maximum time frames required for program completion are listed below. Students who maintain satisfactory academic progress in attendance will complete the program during the allowable maximum time frame.

	Normal Time Frame	Maximum Time Frame
Program 1 (Full Time)	50 Weeks – 1500 Hours	75 Weeks - 2250 Hours
Program 1 (Part Time)	100 Weeks – 1500 Hours	150 Weeks – 2250 Hours
Program 2 (Full Time)	30 Weeks – 900 Hours	45 Weeks - 1350 Hours
Program 2 (Part Time)	60 Weeks – 900 Hours	90 Weeks – 1350 Hours