

Satisfactory Academic Progress Essentials for Compliance at Medical Schools

- Obtain copies of the medical school curriculum for Years 1, 2, 3 and 4 and make sure that you have an understanding as to how a student progresses through the program.
- Obtain a copy of the academic standing policy for medical students and ensure that you understand:
a) what is required to be in good academic standing; b) the process for handling a student who is dismissed due to academic difficulty; c) and the requirements for graduation.
- Ensure that your Promotions Committee is aware of and knowledgeable about your SAP Policy.
- Obtain a copy of the Leave of Absence policy to understand how a student applies and is approved for a Leave of Absence, and how these students are classified by your Registrar. Ensure that your SAP Policy includes a statement about how a Leave of Absence is handled for purposes of measuring SAP.
- Know what is required by the Office of the Registrar to be considered to be at least a half-time student and how students who are less than half-time are classified by your Registrar.
- Know which office submits enrollment data to the NSLDS and how students' enrollment is reported.
- Ensure that the qualitative standards of your SAP Policy require the equivalent of a 2.0 GPA by the end of the second year of the program if letter grades are used. If letter grades are not used, your qualitative standards should refer to the student being in good academic standing by the end of the second year of the program.
- Develop a quantitative measure of a student's progress using the normal program length (usually four years for a medical degree) with a maximum time frame of 150% of the program length to complete the degree.
- Treat remediation as a non-enrolled status (the student is finishing incomplete courses from the previous term). The term during which a student remediates should not be counted in the quantitative measure of the student's progress. Ensure that your SAP Policy addresses the effects of remediation, withdrawal and course repetitions.
- Identify and specify the office responsible for conducting SAP reviews on an annual basis, the office that notifies the student, and the office that handles appeals of students who are notified that they are not maintaining SAP.
- Develop a written SAP Policy in conjunction with your Registrar and Office of Student Affairs that complies with federal laws and regulations and that accommodates your academic program. The final SAP Policy should be approved by the appropriate office/body at your institution (i.e. Office of Student Affairs, Office of the Vice President for Academic Affairs, Board of Trustees).
- Ensure that your approved SAP Policy is made available to all students.

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**Standards for Satisfactory Academic Progress
For Financial Aid Eligibility
For Students Pursuing the M.D. Degree**

- A. Section 668.16(e) requires that, to participate in Title IV student financial aid programs, an institution must establish, publish and apply reasonable standards for measuring whether a student, who is otherwise eligible for aid under any Title IV program, is maintaining satisfactory progress in his or her course of study. A number of parameters are set forth for a reasonable policy; these are noted in subsequent text.

Sample: Federal law and regulations require that all students receiving financial assistance from federal Title IV funds maintain satisfactory academic progress. The following policy presents the standards adopted by the XYZ University College of Medicine. The policy applies to all students receiving financial aid.

- B. Section 668.16(e)(1) provides that the institutional standards of satisfactory progress will be considered “reasonable” if they conform to those of the nationally recognized accrediting agency that accredits the institution. The accrediting body for medical education does not have specific standards for satisfactory academic progress; therefore, this is not a potential problem for compliance at this time.

- C. Section 668.16(e)(2) requires that the standards for a student to receive aid must be the same or stricter than the institution’s standards for a student who is not receiving assistance if the institution has general standards for measuring academic performance and has graduation requirements.

Samples:

- 1. The academic requirements for the M.D. degree include the satisfactory completion of the curriculum designated by the faculty. The progress of each student working toward an M.D. degree is monitored carefully and at least once each academic year is reviewed by the promotions committee.*
- 2. The School of Medicine has established the following standards for a student to be eligible to receive Title IV assistance, as well as to enroll.*

Note: Documentation must be maintained at the institution that the promotions committee did review each student if this method is to be employed. Such documentation is subject to audit.

- D. Section 668.16(e)(3)(i) requires that the policy contain a qualitative measure of performance such as grades, work projects completed, or comparable factors which are measured against a norm. The measure may be expressed by a letter or numerical grade, a pass/fail or a satisfactory measure. The measure should be stated as cumulative and should be progressive in relation to coursework attempted.

Samples:

- 1. The promotions committee reviews, at least at the conclusion of each academic year, the qualitative assessment of performance for each student given by the faculty in all courses for which the student has enrolled. This may be an actual grade, an indication of pass or fail or another form of evaluation. A student who does not satisfactorily complete all course requirements may be permitted to remediate. In this case, a student assigned a schedule that deviates from the norm and who earns satisfactory qualitative assessment in all enrolled courses will be deemed to be making satisfactory academic progress.*
- 2. A student in the School of Medicine program must have a 2.0 cumulative grade point average at the end of his/her second year of enrollment.*

- E. Section 668.16(e)(3)(ii)(iii) and (iv) require that an institution have a quantitative measure to determine the satisfactory progression of the student toward degree completion. The key elements in this measure are:
- (1) a maximum time frame for degree completion based on the student's enrollment status and divided into increments that do not exceed one academic year;
 - (2) a schedule that designates the minimum percentage or amount of work that must be completed by the end of each increment; and a determination by the institution at the end of each increment whether the student has met the established quantitative criteria.

The institution may not simply set a maximum time limit on receipt of aid such as 12 quarters or 8 semesters. The time frame must relate to progress toward degree completion and the institution must also define the time period for an academic year. A summer session may or may not be included at the institution's option. The schedule for the incremental measure must state the minimum credits to be completed is different than attempted amount or percentage of credits to be successfully completed during each increment. The institution may use a graduated percentage of course completion in each increment provided that the graduated schedule permits completion of program requirements within the maximum time frame. The schedule must be cumulative in effect. All periods of attendance must be included regardless of whether or not the student received Title IV aid.

Additionally, the institution must determine, prior to disbursing funds each payment period and prior to certifying a loan application, that the student is making satisfactory progress. An institution determining academic progress once per academic year will rely on this determination until the next academic year evaluation.

Samples: The normal timeframe for completion of required coursework for the M.D. degree is four academic years. Due to academic or personal difficulties, a student may require additional time. In such situations, the promotions committee may establish a schedule for the student that departs from the norm and that may require repeating a year of study. To be considered to be making satisfactory academic progress, the student must complete the first two years of the curriculum by the end of the third year after initial enrollment. The promotions committee will monitor the progress of each student at the conclusion of each academic year to determine if the student is making sufficient progress to meet the time limits as specified. A student not making sufficient progress will be deemed not to be making satisfactory academic progress.

A student may be granted a leave of absence for a variety of reasons. The period of leave for which the student has been approved may be excluded from the maximum time frame in which an individual student will be expected to complete the program.

The period of time for which a student is registered to pursue a full-time, non-credit research fellowship shall be excluded from the maximum time frame in which an individual student will be expected to complete the program.

The promotions committee reviews at least at the conclusion of each academic year the quantitative progress of each student in course completion. A student who does not satisfactorily complete all course requirements may be permitted to remediate. In this case, a student must complete all courses being remediated satisfactorily in order to be considered as making satisfactory academic progress.

The normal minimum period of enrollment at the School of Medicine is 4 years or 14 quarters. For customary academic progress the student will complete satisfactorily:

After 3 quarters – At least 67 units of core courses and 9 hours of elective courses.

After 6 quarters – The above plus at least 50 units of core courses and 12 hours of electives and will have passed Step 1 of the United States Medical Licensing Examination (USMLE).

After 10 quarters – The above plus at least 64 units.

After 14 quarters – The above plus at least 66 units and will have taken Step 2 of the USMLE.

Since the Promotions Committee may give approval for an individual student to repeat a portion or all of a school year (subsequent to incomplete or unsatisfactory course work or an approved leave of absence), the maximum time for enrollment is 5 years or 19 quarters, excluding time spent on an approved leave of absence. The required number of units to be completed at the end of each enrollment period will vary in these cases, according to what portion of the curriculum that must be repeated. Students approved to repeat course work are meeting the school's standards for satisfactory academic progress. It should also be noted that the specific curriculum requirements listed above are subject to change.

- F. Section 668.16(e)(3)(v) requires that standards be consistently applied to all students within categories of students, e.g., full-time, part-time, transfers. Transfer students may be assumed to be making satisfactory progress at the time of initial enrollment at the institution.

Sample: Medical students who are accepted for transfer from other medical schools will be evaluated with respect to levels of academic progress attained, and a determination will be made as to remaining years of financial aid eligibility. This determination will be coordinated among the Dean for Admissions, the Dean for Student Affairs and the Director of Financial Aid.

A student registering for less than full-time enrollment will be allowed additional time of eligibility based on a proportion of the actual registered hours since the time of first enrollment, as compared with the full-time hours for which one would register during the same time period.

- G. Section 558.16(e)(3)(vi) requires that the standards include specific policies on the effect of course incompletes, withdrawals, repetitions and non-credit remedial courses on satisfactory academic progress. Remediation, incompletes and withdrawals are addressed in the sample policies presented in Section E. Schools having non-credit remedial programs must establish a policy on the inclusion of these courses within the qualitative and quantitative measures of progress adopted by the school.
- H. The Higher Education Amendments of 1986 added a minimum grade point average to the criteria for determination of satisfactory academic progress. The regulations require that an institution define in the satisfactory academic progress policy (1) the equivalent of a "C" average if the school does not use letter grades, and (2) academic standing consistent with graduation standards. The institution must

review a student's academic progress at the end of each academic year. By the conclusion of the second academic year, the school must determine that to continue eligibility, a student has a "C" average or its equivalent or academic standing consistent with the requirements of graduation from the program. The latter provision permits a graduated grade point average standard which may be less than a "C" at the end of the second year, but progresses to the required grade point average for graduation within the maximum time frame for completion of the program

Samples: A student must have at minimum a 1.75 cumulative grade point average at the end of the second year of study; 1.90 at the end of the third year; and 2.0 at the end of the fourth year.

Academic progress is not measured by a cumulative grade point average; a student must complete with a "C" grade or better each required course in the curriculum to graduate. Therefore, grade performance as a measure of satisfactory academic progress must be reviewed in the context of each course for which the student registers. The following has been established as the minimum grade performance consistent with graduation:

- (a) At the completion of the first year of enrollment, a grade of "C" or better will have been earned in each required course in Year I.*
- (b) At the completion of the second year of enrollment, a grade of "C" or better will have been earned in each required course in Year 2..*
- (c) At the completion of the third year of enrollment, a student will have completed one-half of the clinical courses required and will have earned a grade of "C" or better in these courses.*
- (d) At the end of the fourth year of enrollment, the student will have completed the requirements for graduation which include a grade of "C" or better in each required course.*

Academic performance is measured in terms of Honors/High Honors/Pass/Fail. For purposes of measuring satisfactory academic progress, the following letter grade equivalencies shall be used: A for Honors; B for High Honors; C for Pass; and F for Fail.

I. A school may include a reasonable conditional or probationary period in its written policy.

Sample: A student failing to meet one or more of the standards of progress shall be placed on financial aid probation. While on probation, the student while on probation may receive student financial aid for one enrollment period. At the conclusion of this period, the student must have complied with each standard.

A student who does not comply with each standard by the end of the probationary period is suspended from financial aid eligibility.

The Associate Dean of Student Affairs must notify a student of implementation of probationary status and suspension.

- J. Section 668.16(e)(3)(vii) and (viii) requires that specific procedures be established for appeal of a determination that a student is not making satisfactory academic progress and for reinstatement of aid. The student's rights must be outlined as well as the procedure for appeal. The institution may determine the existence of mitigating circumstances which justify reinstatement of satisfactory academic progress and financial aid eligibility. Appropriate documentation of the decision and reason(s) must be placed in the student's file.

Additionally, Section 668.7(c)(2)(ii) provides for a waiver of the requirements cited previously in Section H of this guide if the institution determines that the failure to meet the minimum grade requirement was caused by undue hardship. Examples of undue hardship are the death of a relative, injury, illness or other special circumstances.

Financial aid may be disbursed to a student for the grading period in which satisfactory academic progress is regained, but not for those periods in which progress was not maintained.

Samples: A student shall be reinstated for financial aid eligibility when that student has satisfactorily completed sufficient course work to meet the standards of progress.

A student on financial aid probation or suspension may appeal that status by indicating in writing to the Associate Dean for Student Affairs the existence of mitigating circumstances which should result in reinstatement of financial aid eligibility. Each appeal will be considered on its merit by the Promotions Committee.

The school is ready to respond to mitigating circumstances that may arise in individual situations. Students may appeal the loss of eligibility for financial aid to the Associate Dean for Student Affairs. The Promotions Committee then decides whether the mitigating circumstances justify for altering customary standards of academic progress. The Associate Dean for Student Affairs then advises the Financial Aid office of the continued eligibility of the student for Title IV assistance.

- K. The institution may wish to include a section on the assignment of responsibility for assuring compliance with the institutional policy.

Sample: The Associate Dean for Student Affairs shall have primary responsibility for enforcement of this policy. The Financial Aid Office shall provide a copy of this policy to each student at the time of initial enrollment. The Financial Aid Office shall ascertain at the time of disbursement of funds and prior to certification of a student loan application that the student is in compliance with the policy.

SAMPLE POLICY

Academic Standards of Progress for Financial Aid Eligibility for Medical Students

I. Introduction

This policy has been developed to ensure that the Student Financial Aid Program meets or exceeds requirements set forth by federal regulations governing academic standards of progress for financial aid eligibility.

II. Scope

This policy applies to those students receiving Title IV financial aid.

III. General Requirements

A. Time Limits on Financial Aid Eligibility

A student will be permitted a time limit of four semesters of enrollment beyond the standard required length of study as a full-time student to complete the program for which he or she is enrolled. Summer enrollment, if required, is considered part of the academic year for purposes of this measure.

	<u>Standard</u>	<u>Maximum</u>
Doctor of Medicine	4 years	6 years
Doctor of Medicine/Doctor of Philosophy	7 years	9 years

For transfer students, the total years for completion of a degree includes time spent at the previous institution, to the extent that credit hours are transferred and applied toward the degree objective at this institution.

A student registering for less than full-time enrollment will be allowed additional time of eligibility based upon a proportion of the actual registered hours since the time of first enrollment, as compared with normal full-time hours for the same time period.

A student failing to meet this standard will be suspended from financial aid eligibility.

B. Completion of Course Requirements

1. A student must complete with passing grades at least 75 percent of the credit hours for which the student registered and paid fees for each academic year (fall through summer terms). Any student failing to meet this 75 percent standard due to unsatisfactory or failing grades, withdrawal or an incomplete will be placed on financial aid probation. A student on probation must achieve this 75 percent standard for all enrolled courses for the period beginning the next Fall term and ending the following Summer term, or be suspended from financial aid eligibility.
2. As soon as incomplete grades are changed to earned grades, the student's probationary or suspended status may be lifted if the course standards are completed.

IV. Grade Requirements

- A. The School of Medicine does not measure academic progress by means of a cumulative grade

point average. The student is required to complete with at least a “C” grade or its equivalent all of the required courses in the curriculum in order to graduate. Therefore, grade performance as a measure of satisfactory academic progress for financial aid eligibility must be reviewed in the context of each course for which the student registers. The following standards for financial aid eligibility have been established:

1. Completion of first year of enrollment: Earned grade of at least a “C” or its equivalent in each of the required courses in Year 1.
 2. Completion of second year of enrollment: Earned grade of at least a “C” or its equivalent in each of the required courses in Year 2.
 3. Completion of third year of enrollment: Completion with earned grade of “C” or its equivalent in Year 3.
 4. Completion of fourth year of enrollment: Satisfaction of requirements for graduation.
- B. Any student failing to meet the above grade requirements will be placed on financial aid probation.
- C. A student placed on probation for financial aid eligibility must, by the end of the probationary enrollment year, attain the standing specified in IV.A. of this policy for satisfactory academic progress; failure to do so will result in suspension of financial aid eligibility.

V. Appeals of Financial Aid Probation or Suspension

A student on probation or suspension may appeal by indicating in writing to the Associate Dean of Student Affairs (a) reasons why he/she did not achieve minimum academic standards and (b) reasons why his/her aid eligibility should not be terminated or should be reinstated. Each appeal will be considered on its own merit. Individual cases will not be considered as precedent.

- A. The Associate Dean of Student Affairs will review the appeal within three weeks of its receipt and determine whether the financial aid probation or suspension is justified. The student will be advised in writing of the decision within one week of the appeal’s consideration.
- B. A student wishing to appeal the Associate Dean’s decision to the Dean of the Medical School may do so in accordance with these procedures:
1. A written appeal must be sent to the Dean of the Medical School within two weeks of the Associate Dean’s decision.
 2. The Dean of the Medical School will review the student’s appeal and recommend an appropriate decision to the Associate Dean within three weeks of the receipt of the appeal.
 3. The Associate Dean shall then consider the appeal and recommendation and will notify the student in writing of a final decision within one week.

VI. Reinstatement

A student shall be reinstated for financial aid eligibility at such time as he or she successfully completes sufficient hours and has a sufficient GPA to meet the minimum eligibility requirements as set forth in this

policy. It is the student's responsibility to present evidence to the Financial Aid Office at the time he/she has met minimum requirements for reinstatement.

VII. Enforcement

The Office of the Associate Dean for Student Affairs shall have primary responsibility for enforcing this policy. The Office of the Registrar and other offices that maintain student information relevant to enforcement shall provide information, when requested by the Associate Dean for Student Affairs.

This Guide is a revision of the "Satisfactory Academic Progress for Receipt of Title IV Student Aid – A Guide for Medical Schools" published by the Association of American Medical Colleges in April 1985 and revised in February 1992.

**Legislative and Regulatory Chronology of
Satisfactory Academic Progress Policy**

- 1976** *Higher Education Act Amendments*
- Established basic requirements for Satisfactory Academic Progress
- 1979** *Federal Register - General Provisions*
- Regulations published for establishing Satisfactory Academic Progress
- 1980** *Federal Register - General Provisions*
- Reasserted standards for Satisfactory Academic Progress
- 1979-80** *Federal Student Aid Handbook*
- Discussion of what constitutes “reasonable standards” of Satisfactory Academic Progress to include quantitative (time frame) and qualitative (grades) measures
 - GSL/PLUS programs did not require that student be enrolled in a degree or certificate program and, as such, the quantitative measure of SAP did not apply
- 1982** *Higher Education Act Amendments [Section 484]*
- Required that, in order to receive any Title IV aid, a student must be maintaining Satisfactory Academic Progress in the course of study being pursued
- 1983** *Federal Register - General Provisions (effective January 1, 1984)*
- Provided parameters to institutions for establishing standards of Satisfactory Academic Progress for receipt of Title IV student financial assistance
 - Progress must be measured for all periods of enrollment regardless of whether student received Title IV aid
 - Progress must be measured at least once each academic year
 - Established concept of incremental measurement of progress and method for determining the percentage of work to be completed each year assuming equal percentages for each increment
- 1983** *Q & A*
- 1983** *Dear Colleague Letter 84-P-121*
- 1984** *Q & A*
- Policy update: the maximum time frame can be in credit hours attempted and incremental progress can be measured by percentage of hours completed against hours attempted. This dropped the specificity of determining the percentage of work completed that was contained in the October 3, 1983 regulations and was made retroactive to January 1, 1984)
- 1984** *Dear Colleague Letter GEN-84-11*

1986 *Higher Education Act Amendments*

- Added requirement that student must have a “C” or equivalent, or the academic standing for graduation at the end of the second year

1987 *Federal Register - General Provisions*

- Made only minor changes to the Satisfactory Academic Progress standards

1993-94 *Federal Student Aid Handbook*

1994 *Federal Register - General Provisions*

- Established maximum time frame for degree completion as 150% of the program length

1994 *Federal Register - General Provisions*

- Clarified that periods of non-enrollment do not count against quantitative measurement of Satisfactory Academic Progress
- Clarified that the time frame must be divided into increments of equal size, which are expected to coincide with the institution’s payment periods
- Outlined the following as indications that an institution’s Satisfactory Academic Progress policy is reasonable:

- They conform with the standards, if they exist, of the nationally recognized accrediting agency if the agency has these standards;
- The standards are the same or stricter than the institution’s academic standards for students in the same educational program who are not receiving Title IV aid;
- The standards must include grades, work projects or other factors which are measured against a norm;
- The standards include a maximum time frame for degree completion which is no longer than 150% of the program length;
- The time frame must be divided into increments of equal size not to exceed the lesser of one academic year or one-half the published length of the program;
- The standards must include a schedule designating the minimum percentage or amount of work a student must successfully complete at the end of each increment;
- The standards must include an institutional determination at the end of each increment whether the student has successfully completed the appropriate percentage or amount of work;
- The standards are consistently applied to all students within categories of students (i.e. full-time, part-time, graduate);
- The standards include specific policies defining the effect of course incompletes, withdrawals, repetitions and noncredit remedial courses on satisfactory academic progress;
- The standards include specific procedures by which a student may appeal a determination of unsatisfactory academic progress;
- The standards include specific procedures for reinstatement of aid.

1994 *Dear Colleague Letter 94-41*

- Clarified that maximum timeframe can be calculated using credit hours, clock hours, terms, academic years or any other reasonable measure

Policies/Regulations Related to Satisfactory Academic Progress

Leave of Absence

1994 *Federal Register*

- Effective July 1, 1994, a student who has taken an approved leave of absence is considered to have withdrawn for purposes of Title IV refunds. The FFEL programs treatment of leaves of absence remains in effect, but only for purposes of in-school deferment

1998 *Reauthorization of the HEA of 1965*

- Effective July 1, 1999, a student who has taken an approved leave of absence for less than 180 days is not considered to have withdrawn.

Enrollment

1996-97 *Federal Student Aid Handbook*

- Schools define what is considered to be full-time enrollment
- The school's definition of a full-time workload must be used for all students enrolled in that program and must be used consistently for all SFA-related purposes
- A full-time student is defined as a student who is carrying a full-time academic workload (other than by correspondence) as determined by the institution under a standard applicable to all students enrolled in a particular educational program. The student's workload may include any combination of courses, work, research, or special studies that the institution considers sufficient to classify the student as full time.

Note: The regulations are virtually silent on graduate student enrollment and, thus, schools have substantial latitude in defining full-time coursework for graduate programs. However, the school must define its own policies on graduate enrollment (which may include any combination of classroom coursework, research, special studies or employment) and then must use the definition consistently throughout the institution.

Cost of Education

1989 *Dear Colleague Letter GEN-89-28*

Costs of professional licensing examination review courses and professional licensing examination fees may not be included in the cost of attendance.

1999 *Email Message from Jeff Baker, Department of Education*

DE clarified that, as long as the institution requires passage of the licensing exam for graduation, the cost of exam may be included in the cost of education.

GLOSSARY OF TERMS

Combined Degree:

A combined program is conducted under the joint auspices of two schools in a single institution. A combined degree student is enrolled in 2 degrees simultaneously, (i.e.), the MD/MPH, the MD/Ph.D., etc.

Curriculum:

Courses which have been prescribed and approved by the faculty and administration for the completion of a degree.

Enrollment:

Registration of courses and payment of fees.

Leave of Absence:

A period of time when a student is not actively engaged in academic activity. Leaves of absence can be for medical, family, personal or academic reasons. They can be requested by the student or required by the administration.

Matriculated:

A student that is considered progressing in the medical curriculum. A matriculated student does not have to be enrolled to be considered matriculated.

Probation:

A period of time when a student is actively engaged in academic activity but is monitored by the school administration and asked to meet certain standards to satisfy academic expectations.

Promotions Committee:

Members of the administration and faculty appointed to monitor the academic performance of students. Periodic meetings are held to review all student academic activity.

Qualitative measure:

Grades earned, (i.e.) Honors, Pass, Fail, or any other form of evaluation.

Quantitative measure:

A maximum time frame for the completion of a degree or a schedule which designates the amount of work needed to be completed in a given period of time.

SAP:

Satisfactory Academic Progress: a term used by federal and state student financial aid programs which require students make satisfactory academic progress, as defined by the educational institution, toward completion of their program of study in order to be eligible for financial aid assistance.

Step 1- USMLE:

The first of a required series of examinations for licensure administered by the National Board of Medical Examiners. It is usually taken at the end of the first two pre-clinical years of medical school.

Step 2- USMLE:

The second of a required series of examinations for licensure administered by the National Board of Medical Examiners. It is usually taken sometime in the fourth year of medical school.

Suspension:

An action taken by the administration and/or promotions committees to address a variety of issues such as remediation, academic difficulty or behavioral problems. While on suspension, a student is not actively engaged in academic activity.

Title IV (of the Higher education Act of 1965):

Provides authority for all student aid programs administered by the Department of Education.