

Satisfactory Academic Progress

Contents

Satisfactory Academic Progress Essentials for Compliance at Medical Schools

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

Satisfactory Academic Progress (Timeline)

Satisfactory Academic Progress – Glossary of Terms

Satisfactory Academic Progress Essentials for Compliance at Medical Schools

To be eligible for Title IV aid, a student must maintain satisfactory academic progress (SAP). Under the federal administrative capability requirements, all schools must establish, publish and apply reasonable standards for measuring whether or not students are maintaining SAP. To assist medical school financial aid offices in the development of an effective and compliant policy, the AAMC Committee on Student Financial Assistance (COSFA) has prepared the following information resource. This document provides an overview of the policy requirements, a timeline of significant Department of Education announcements regarding SAP, and a glossary of terms most relevant to SAP.

The following recommendations highlight the key points to consider as you begin this process:

- 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
- Know what is required by the Office of the Registrar to be considered at least a half-time student and how students who are less than half-time are classified by your Registrar
- 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 the qualitative standards of your SAP policy specify the GPA or appropriate qualitative measure that a student must achieve at each evaluation. In particular, the policy should specify that at the end of the second year the student must have a GPA of at least a “C”

or equivalent, or if letter grades are not used, the policy must specify that the student have academic standing consistent with the institution's requirements for graduation

- Confirm that the SAP policy specifies the pace at which a student must progress through his or her educational program to ensure the student will complete the program within the maximum timeframe. The maximum timeframe for a graduate program is a period defined by the institution that is based upon the length of the educational program. Generally, the maximum timeframe for medical schools follows the undergraduate maximum timeframe (150% of the program length)
- Ensure that the SAP policy describes how a student's GPA and pace of completion are affected by course incompletes, withdrawals, or repetitions, or transfers of credits 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
- Identify and specify the office responsible for conducting SAP reviews on a payment period or an annual basis, the office that notifies the student, the office that handles appeals of students who are notified that they are not maintaining SAP, and *if appropriate* the office that constructs an academic plan for a student and the office that monitors whether the student is following the academic plan
- Ensure that your Promotions Committee is aware of and knowledgeable about your SAP policy
- Ensure that your approved SAP Policy is made available to all school constituents

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

- A. Section 668.16(e) requires that, for purposes of determining student eligibility for assistance under a Title IV, HEA program, an institution establishes, publishes, and applies reasonable standards for measuring whether an otherwise eligible student is maintaining satisfactory academic progress in his or her educational program. The Secretary considers an institution's standards to be reasonable if the standards are in accordance with the provisions specified in Section 668.34.
- B. Section 668.34(a)(1)(2)(3) considers the institutional policy to be reasonable if the policy:
 - a. Is at least as strict as the policy the institution applies to a student who is not receiving assistance under the Title IV, HEA programs *and*
 - b. Provides for consistent application of standards to all students within categories of students (e.g., full-time, part-time, undergraduate, and graduate students), and educational programs established by the institution
- C. For MD programs (i.e., programs greater than one academic year), Section 668.34(a)(3) requires that the policy provides that a student's academic progress is evaluated at the end of each payment period or at least annually to correspond with the end of a payment period.
- D. Section 668.34(4)(i) requires that the policy specify the grade point average (GPA) that a student must achieve at each evaluation, or if a GPA is not an appropriate qualitative measure, a comparable measure against a norm.
- E. Per Section 668.34(4)(ii), the policy specifies that at the end of the second academic year, the student must have a GPA of at least a "C" or its equivalent, or have an academic standing consistent with the institution's requirements for graduation.
- F. Section 668.34(5)(i) requires that the policy specifies the pace at which a student must progress through his or her educational program to ensure that the student will complete the program within the maximum timeframe. Per Section 668.34(11)(b)(3), the maximum timeframe for a graduate program is a period defined by the institution that is based on the length of the educational program. Generally, MD programs follow the maximum timeframe requirements in place for undergraduate programs (Section 668.34(11)(b)(1)(2)):
 - a. For a program measured in credit hours, a period that is no longer than 150% of the published length of the educational program
 - b. For a program measured in clock hours, a period that is no longer than 150% 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
- G. Section 668.34(5)(ii) requires that an institution calculate the pace at which a 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.

- H. Per Section 668.34(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.

Institutions that evaluate SAP at the end of each payment period (Section 668.34(11)(c)):

An institution that evaluates SAP at the end of each payment period and determines that a student is not making SAP under its policy may nevertheless disburse Title IV funds to the student for the payment period immediately following the payment period in which the institution determined that the student did not make SAP. During this subsequent payment period, the institution can either place the student on (a) financial aid warning or directly on (b) financial aid probation. The conditions for which a student may qualify for Title IV funds during this subsequent payment period depend upon whether the student is placed on financial aid warning or financial aid probation.

(a) Financial aid warning:

- a. An institution that utilizes the financial aid warning period for the payment period immediately following the payment period in which the student did not make SAP may disburse Title IV funds to the student during the financial aid warning period. No further action is necessary.
- b. If the institution determines that the student on financial aid warning is not making SAP by the end of the financial aid warning period, the institution may place the student on financial aid probation for the following payment period. The student would be eligible for Title IV funding during the financial aid probation period if:
 - i. The student appeals the institution's determination that the student is not making SAP and
 - ii. The institution determines that the student should be able to meet the institution's SAP by the end of the financial aid probation period or the institution develops an *academic plan* that, if followed, will ensure that the student is able to meet the institution's SAP standards *by a specific point in time*

(b) Financial aid probation:

- a. An institution that does not utilize the financial aid warning period may place a student directly on financial aid probation for the payment period immediately following the payment period in which it was determined that the student was not making SAP. The institution may disburse Title IV aid to the student during the financial aid probation period if:
 - i. The student appeals the determination that he/she is still not making SAP and:
 - ii. The institution determines that the student should be able to meet the institution's SAP by the end of the subsequent payment period; or the institution develops an *academic plan* for the student that, if followed, will ensure that the student is able to meet the institution's SAP standards *by a specific point in time*.

Note: while the institution has discretion to determine the length of the academic plan, the student required to follow an academic plan must still be monitored on a payment period basis to confirm that he/she is meeting the components as specified in the academic plan. A student is not eligible to receive Title IV program funds for the payment period following the financial aid probation period unless the student is making SAP and/or the institution determines that the student is meeting the requirements specified in the academic plan; or the institution allows students to appeal more than once (see Continuation of Non-Satisfactory Academic Progress).

Institutions that evaluate SAP annually or less frequently than at the end of each payment period (Section 668.34(11)(d)):

An institution that evaluates SAP annually or less frequently than at the end of each payment period and determines that a student is not making SAP under its policy may nevertheless disburse Title IV funds to the student for the payment period immediately following the payment period in which the institution determined that the student did not make SAP. The student would be placed directly on financial aid probation during this subsequent payment period. The student would be eligible for Title IV funding during the financial aid probation period if:

- (a) The student appeals the institution's determination that the student is not making SAP and
- (b) The institution determines that the student should be able to meet the institution's SAP by the end of this subsequent payment period or the institution develops an *academic plan* that, if followed, will ensure that the student is able to meet the institution's SAP standards *by a specific point in time*

Note: while the institution has discretion to determine the length of the academic plan, the student required to follow an academic plan must still be monitored on a payment period basis to confirm that he/she is meeting the components as specified in the academic plan.

A student is not eligible to receive Title IV program funds for the payment period following the financial aid probation period unless the student is making SAP and/or the institution determines that the student is meeting the requirements specified in the academic plan; or the institution allows students to appeal more than once (see Continuation of Non-Satisfactory Academic Progress).

Continuation of Non-Satisfactory Academic Progress

If it is determined that the student is not making SAP at the end of the financial aid probation period (if no academic plan has been established), or is not making SAP in accordance with the components specified in the academic plan, he/she may be eligible to continue to receive Title IV program funds if:

- (a) the institution allows a multiple appeal process and the student has not exceeded the limit on the allowable number of appeals
- (b) the student once again successfully appeals the institution's determination that the student is not making SAP and

- (c) the institution determines that the student should be able to meet the institution's SAP by the end of the subsequent payment period or the institution develops an academic plan that, if followed, will ensure that the student is able to meet the institution's SAP standards by a specific point in time.

Financial Aid Appeal

Appeal refers to a process by which a student who is not meeting the institution's satisfactory academic progress standards petitions the institution for reconsideration of the student's eligibility for Title IV program assistance.

If the institution permits a student to appeal a determination by the institution that he or she is not making SAP, per Section 668.34(9)(i)(ii)(iii) the policy must describe:

- a. How the student may reestablish his or her eligibility to receive Title IV assistance
- b. 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; and
- c. 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

Section 668.34(10)(11) states that if the institution does not permit a student to appeal a determination by the institution that he or she is not making SAP, the policy must describe how the student may reestablish his or her eligibility to receive Title IV assistance and

The policy provides for notification to students of the results of an evaluation that impacts the student's eligibility for Title IV program funds.

SATISFACTORY ACADEMIC PROGRESS (Timeline)

May 1982

Federal regulations of May 1982 state that each institution shall establish, publish, and apply "reasonable standards" for assuring that every student receiving need-based financial aid should maintain "satisfactory progress in his/her course of study."

October 6, 1983

Final Federal regulations, published October 6, 1983, state that "in order to receive student financial aid under the programs authorized by Title IV of the Higher Education Act, a student must be maintaining satisfactory progress in the course of study he or she is pursuing according to the standards and practices of the institution in which he or she is enrolled."

February 24, 2004 – DCL GEN-04-04

Satisfactory Academic Progress (668.34 and 668.16(e) – In the situation in which a student fails to meet the institution's satisfactory academic progress standards due to a disaster, the institution should apply the exception provision of "other special circumstances" contained in 668.34©(3) of the regulations. The institution must document in the student's file that the student's failure to maintain satisfactory academic progress was due to a disaster.

April 27, 2006 – DCL GEN-06-05

The HERA amends the definition of an academic year for a program to require a minimum of 30 weeks of instructional time for a program that measures its length in credit hours or a minimum of 26 weeks of instructional time for a program that measures its length in clock hours.

May 2, 2006 – DCL GEN-06-07

In Dear Colleague Letter GEN-04-04, the Department provided guidance on the application of the satisfactory academic progress requirements for students affected by a natural disaster. Due to problems resulting from Hurricanes Katrina and Rita, some students may not be able to meet satisfactory academic progress requirements. Institutions may use the "other special circumstances" provision in 34 CFR 668(c)(3) to find that a student is meeting these requirements despite not meeting the institution's regular satisfactory academic progress standards because of the hurricane. Because this is permitted under existing regulations, there is no deadline for institutions using this authority.

June 18, 2010

On June 18, 2010, the Department of Education (ED) issued proposed regulations on a group of topics known as "Program Integrity Issues." Final rules were published in the *Federal Register* on October 29, 2010. There are 14 separate topics addressed in the rules, one of which is the issue of Satisfactory Academic Progress.

There were three regulatory sections associated with requirements and references:

Administrative capability 668.16 (e)

Student eligibility 668.32(f)

Satisfactory progress 668.34

Now all requirements are in 668.34 with cross references in 668.16(e) and 668.32(f)

Effective: July 1, 2011

34 CFR 668.34

Federal statute outlines Satisfactory Academic Progress (SAP) as a set of qualitative and quantitative standards established by a school that require its students to maintain an academic standing consistent with the school's policy on progress toward graduation requirements. SAP regulations were consolidated into a single section in 34 CRR 668, "Student Assistance General Provisions," by moving regulations contained in "Standards of Administrative Capability" to "Satisfactory Academic Progress." The new rules define warning periods and probationary periods, and clarify that only schools evaluating SAP each payment period may utilize warning periods.

34 CFR 668.34(a)(4)-(5) – Qualitative and Quantitative Measures

A school's SAP policy must continue to include qualitative and quantitative components. In addition to grades, schools must establish the normal time frame for completion of each program of study. Also, Final Rule requires schools to identify the completion rate (PACE) necessary to finish a program within the established maximum time frame, and measure each student's pace toward completion during every SAP evaluation period.

34 CFR 668.34(a)(6) – Transfer Credits

Schools that accept hours toward the student's program from another institution now will be required to count those hours as both attempted and completed in a student's SAP evaluation.

34 CFR 668.34(a)(8) – Financial Aid Warning and Probation

34 CFR 668.34(b)-(d)

All students must be notified if their SAP status affects their future aid eligibility. The terms "financial aid warning" and "financial aid probation" are established and defined.

34 CFR 668.34(a)(9) – SAP Appeals

An institution is free to craft a SAP policy that allows appeals or not, and to specify when and how such appeals will be permitted as well as how often and how many times a student may appeal.

34 CFR 668.34(a)(11) – Student Notification

Schools must notify the student of any changes to aid eligibility as a result of the SAP evaluation. This is in addition to the current requirements to notify students of how to regain eligibility.

Satisfactory Academic Progress

GLOSSARY OF TERMS

Academic Plans:

A specific course of action by which a student's poor academic standing is remediated. Although not required, if a plan is implemented it must be followed.

Appeal:

A process by which a student who is not meeting the school's SAP standards petitions the school for reinstatement of academic standing and approval for Title IV eligibility.

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/PhD, MD, MPH, etc).

Completion Rate:

The qualitative rate of successfully completed courses expected of students toward the completion of degree requirements

Curriculum:

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

Documentation:

A comprehensive record of all Satisfactory Academic Progress assessments, notices to students, appeals, resolutions of appeals, actions taken and statistics on student performance.

Enrollment:

Registration of courses and payment of fees.

Evaluation Period:

Equal parts of the maximum time frame at the end of which students will be evaluated, minimally once a year.

Financial aid probation:

A status assigned by the school 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 a school that evaluates academic progress at the end of each payment period. A student is eligible for aid during this period.

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.

Maximum time frame:

A maximum period defined by the school in which a student must complete their educational program.

Mitigating Circumstances:

Circumstances under which a student may be granted an appeal or adjustment to the standards of Satisfactory Academic Progress such as: death in the family, serious illness, financial or interpersonal difficulties.

Pace (Formerly referred to as the Quantitative component):

Defines the pace the student must progress to ensure educational program completion within the maximum timeframe.

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 Standard:

Measure of how much well a student is doing in the completion of degree requirements, typically the GPA or other similar standard. Federal regulations require at least a "C" average or its equivalent.

Quantitative Standard:

Measure of how much of the degree program a student has completed, typically the number of credits or courses, against the normal completion rate. Minimum amount expected to be completed must be stated.

Remediation:

Opportunity to correct past deficiencies by retaking an exam, repeating a course(s) or part of course(s).

SAP:

Satisfactory Academic Progress: Successful completion of degree requirements according to published increments that lead to degree completion within published time limits.

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 second pre-clinical year 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:

Situation in which a student is barred from enrollment for a specified period of time due to failure to meet academic standards and/or violation of school/university policies.

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

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

Withdrawal:

Situation in which a matriculated student's enrollment is officially terminated (either voluntarily through approved application by the student or by the school's administrative action as a result of student's failure to re-enroll, or involuntarily due to decision by school personnel); readmission may only occur following formal re-application.

Prepared by COSFA
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