

Satisfactory Academic Progress (SAP)

NCASFAA Conference 2026

Current Regulations, Institutional
Best Practices, and Looming Title IV
Changes

Agenda

- SAP foundations in statute and regulation (34 CFR 668.16, 668.32(f), 668.34)
- Qualitative (GPA) and quantitative (pace/MTF) requirements
- Timing of SAP evaluations
- Treatment of repeats, incompletes, withdrawals, and transfer credits
- Probation (warning), appeals, academic plans, and regaining eligibility
- Special cases: subscription-based, nonterm, and clock-hour programs
- Documentation, consumer information, and compliance pitfalls
- What's next: negotiated rulemaking and potential downstream SAP impacts

Regulatory Framework

- Institutional capability (668.16(e)) and student eligibility (668.32(f)) are linked to SAP.
- Core SAP policy requirements live in 34 CFR 668.34 (your policy must be at least as strict as for non-Title IV students; as it is for Title IV students).
- Evaluation frequency:
 - each payment period for programs ≤ 1 Award year; otherwise,
 - each payment period or at least annually aligned to a payment period.
- Policy must define
 - qualitative standard (GPA or comparable measure),
 - quantitative standard (pace where required),
 - and maximum timeframe.

Qualitative Standard (GPA)

- GPA or a comparable normed assessment if GPA is not appropriate.
- Programs greater than 2 academic years: at the end of the second award year, the student must have at least a 'C' average (or standing consistent with graduation).
- Your policy must describe how GPA is affected by repeats, remedial coursework (if applicable), transfer credits, and various grades (I/W/F, etc.).

Quantitative Standard (Pace & Maximum Timeframe)

- Pace: measure progress to ensure completion within Maximum Time Frame—commonly 67% completion rate in credit-hour term-based programs.
- Maximum Timeframe (MTF): $\leq 150\%$ of published program length for undergraduate programs; graduate MTF defined by the school, tied to program length.
- For subscription-based, non-term, and clock-hour programs: pace requirement is not currently mandated; MTF still applies and must be defined in policy.

Evaluation of SAP

- Evaluation at each required checkpoint against both qualitative and quantitative measures.
- How often and why are their options in this piece?

Warning/Probation, and Reinstatement

- Warning (optional): permitted after not meeting SAP when school evaluates at the conclusion of each payment period; aid eligible for one subsequent period.
- Appeal & Probation: if an appeal is approved, probation is limited to one payment period unless an academic plan extends eligibility.
- Academic Plans:
 - required if it will take a student more than one semester to regain eligibility
 - must be designed to lead to the student meeting SAP within a set time
 - must be monitored and updated;
 - document terms and benchmarks.
- Regaining Eligibility: by meeting SAP standards or successfully following the academic plan; merely sitting out does not requalify a student regardless of how long they sit out.

Coursework Treatment in SAP

- Your policy needs to
 - define how repeats, withdrawals (W), incompletes (I), and transfer credits affect GPA, pace, and MTF
 - document how remedial coursework
 - up to 30 hours may be excluded from pace calc per regulation
 - ESL and noncredit coursework: specify whether/how counted toward pace and MTF per institutional policy and program structure.
 - Change of major and second-degree students: prior credits generally count toward MTF; clearly state if/how exclusions apply.

Special Program Structures

- Subscription-based and nonterm credit-hour programs: no federal pace requirement; define local progress measures and MTF.
- Clock-hour programs: evaluate SAP at payment periods defined by clock-hour progression; no federal pace requirement but MTF must be set in calendar time or hours.
- Competency-based education (CBE): align SAP checkpoints with credit/competency equivalencies and payment periods; document conversions and evidence.

Consumer Information & Documentation

- Publish SAP policy where students can access it
 - make sure it includes
 - the measures
 - timing of evaluations
 - how course types are treated
 - appeal process
 - academic plans,
 - Notification: timely written notices for warning, suspension, appeal outcomes, and plan terms.
- Recordkeeping: maintain calculations, transcripts, appeal documents, and plan monitoring artifacts for audits and program reviews.
- Internal controls and best practices: periodic file reviews, cross-checks with registrar, and automated pace/MTF calculators.

Looming Title IV Changes: What to Watch

- 2025–26 negotiated rulemaking (RISE/AHEAD/AIM) focusing on loans, accountability, and modernization; indirect SAP effects possible via eligibility and program integrity changes.
- NPRM (Jan 30, 2026) proposes implementing OBBB statute: phasing out Grad PLUS, revising loan limits, and consolidating repayment plans—could alter appeal volumes and academic planning due to borrowing changes.
- Recent final rules on distance education and R2T4 may drive updates to definitions/reporting; ensure SAP aligns with modality and attendance tracking updates.
- Timeline: Proposed rules in 2026; earliest effective dates generally July 1 following a Nov 1 final rule (Master Calendar), with some statutory items phased earlier.

Operational Best Practices

- When possible, use data dashboards to monitor pace and MTF at mid-term, not just at evaluation checkpoints.
- Standardize appeal intake and processing with standardized forms and checklists;
 - circumstances
 - Documentation
 - resolution steps
 - Academic plan).
- Calibrate GPA/pace rounding and transfer-credit counting rules with Registrar to avoid inconsistencies.
- Run annual SAP policy audits against regulation
 - remediate gaps with action plans
 - train advisors and faculty on academic plan obligations and early alerts.

Key References

- FSA Partner Connect: SAP Assessment & Handbook crosswalk (incl. 2024–25 links).
- eCFR 34 CFR 668.34 (SAP), 668.16(e), 668.32(f).
- NASFAA SAP 2025–26 self-study (for training context).
- ED Negotiated Rulemaking 2025–26 page (RISE/AHEAD/AIM committees).
- Federal Register NPRM (Jan 30, 2026) implementing OBBB loan changes.
- Legal/analysis summaries: Distance Education & R2T4 final rules.

Questions

