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The Overlooked Obstacle

How Satisfactory Academic Progress Policies Impede Student Success and Equity



JBAY

JOHN BURTON
Advocates
for Youth

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The perspectives presented in this report represent those of the authors and do not necessarily reflect the views or opinions of the contributors and reviewers.



Executive Summary

For college and university students, access to financial aid has been cited as key to addressing basic needs (i.e., food and housing) insecurity, improving academic outcomes, and addressing racial inequities. While much attention has been paid to the need to expand financial aid access at the beginning of a student's academic career, virtually no attention is given to whether students are subsequently able to maintain financial aid once enrolled.

Advocacy efforts have focused locally in California on making the Cal Grant program, California's largest financial aid program, available to more low-income students in general, and more community college students in particular. National efforts have focused on simplifying the application process for federal financial aid, providing tuition-free community college, increasing the amount paid by the Federal Pell Grant, and reducing reliance on student loans. While these efforts are undoubtedly essential, they address only half of the financial aid equation. What has been largely ignored is that sizable numbers of students lose access to financial aid after just one year of college due to academic standards known as Satisfactory Academic Progress (SAP) – and these students are unlikely to return.

SAP standards include a two-part assessment that requires that students meet minimum Grade Point Average (GPA) and course completion requirements to maintain access to financial aid. Students must also complete their program within 150 percent of the published time frame for the program (e.g., a student in an Associate Degree program that requires 60 units to complete cannot attempt more than 90 units).

Research has found that college students are more likely to complete an academic degree or certificate if they come from higher-income families, have parents who went to college, have

stronger academic preparation in high school, enroll in college shortly after high school graduation, are committed to a goal of completing a degree, and attend college full-time without interruption. And yet, when it comes to the standards that govern maintaining financial aid, little consideration is made for the additional challenges faced by students from lower-income families, who are first in their family to attend college, who attended low-performing high schools, or who cannot attend college full-time due to work and family obligations. As a result, these students, who are also disproportionately students of color, are further hindered by SAP requirements in their ability to succeed in college.

A key study examining SAP found no differences in the level of motivation between students who were making SAP and those who were not. Students who were not making SAP, however, had significantly more life responsibilities (childcare, employment, family responsibilities, etc.) and fewer resources (family support, reliable transportation, access to food and housing, flexible work schedule, etc.). Those not making SAP also had less access to cultural capital that could help them to understand how to navigate college inside and outside of the classroom. These students also experienced greater feelings of powerlessness as a result of facing experiences such as homelessness, child welfare system

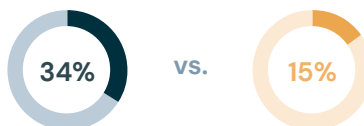
Executive Summary (continued)

involvement, witnessing family abuse and extreme financial hardship.

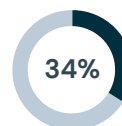
To more fully understand the scope of this issue at California's community colleges, John Burton Advocates for Youth (JBAY) received aggregated data from the Cal-PASS Plus system, managed by Educational Results Partnership, that included all students who enrolled in a California Community College for the first time in Fall 2017 and received a Pell Grant.^a This cohort included a total of 76,125 Pell Grant recipients. An analysis of this data conducted by JBAY in collaboration with Educational Results Partnership found that:



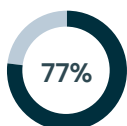
One in four of California's incoming community college Pell Grant recipients are **likely not making SAP for their first two consecutive terms**, disqualifying them from continued access to most forms of financial aid without a successful appeal.



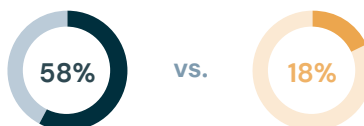
Rates of SAP failure for Black students who received a Pell Grant in their first year were more than twice that of white students: 34 percent vs. 15 percent.



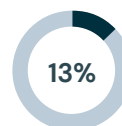
The highest rates of SAP failure were found among students with experience in the foster care system, who had a SAP failure rate of 34 percent after their first year.



Among those who failed to make SAP and remain enrolled, the vast majority (77 percent) had **lost their Pell Grant award**, further decreasing their likelihood of success.



Pell Grant recipients who do not make SAP are significantly more likely to disenroll from college than those who do make SAP. After one year, **the rate of disenrollment for students who did not make SAP was triple that of those who did achieve SAP**. Fifty-eight percent of students who failed to make SAP during their first year did not return for a second year, compared to 18 percent of students who did achieve SAP.



When disenrollment and loss of Pell Grant were examined together, just 13 percent of students who did not achieve the necessary GPA and course completion rates **remained enrolled and continued to receive a Pell Grant by the start of their second year of college**.

^a For consistency in data analysis, students enrolled in the three colleges on a quarter system were excluded. Comprehensive data was not available through Cal-PASS Plus for the other post-secondary segments in California, and as such the analysis focuses on community colleges.

Executive Summary (continued)

The metrics above present a troubling narrative regarding students' ability to remain enrolled and maintain financial aid after the crucial first year in college. The differences across ethnic groups and between foster youth and non-foster youth also point to the disparate impact that SAP policies have on different student groups. These disparities should not be construed as a failure on the part of the students, but rather as evidence of the continued failure of our systems, both within education and elsewhere, to adequately address and remedy the historic and ongoing inequities faced by these subgroups. SAP policies then serve to reinforce the institutional racism that has put these students at a disadvantage in the first place.

INSTITUTIONAL RECOMMENDATIONS

Federal law authorizes individual institutions to use local discretion to create policies and practices that can significantly reduce disparities and offer all students more opportunities to be successful. JBAY conducted a scan of SAP policies across colleges and universities in California, and found tremendous variability, with examples of policies designed to maximize the likelihood of student success and those that create additional barriers beyond those required by federal law.

Policies that can better support student success include:

1

Evaluate Satisfactory Academic Progress (SAP) in such a way that allows students the maximum amount of time to retain financial aid while also offering ample warning of potential disqualification.

Semester institutions should evaluate SAP at the end of each term rather than annually to allow students the opportunity to receive a warning, and to provide sufficient time to coordinate on-campus supports to improve academic performance. Quarter institutions should formally evaluate SAP annually, to avoid the potential loss of financial aid after two quarters, but should develop early warning systems to alert students at risk of losing financial aid.

2

Implement an escalating GPA structure.

Federal financial aid regulations do not require a 2.0 GPA standard for each term but rather allow institutions the flexibility to implement an escalating GPA standard. For example, a policy could require a lower GPA during the first year or for a specified number of units, ultimately requiring a 2.0 cumulative GPA by the end of the program. GPA standards should also not exceed those required by federal regulations, which require a cumulative GPA that is consistent with the institution's requirements for graduation.

3

Implement a graduated course completion percentage.

Course completion standards should also not exceed those required by federal regulations. As with GPA requirements, all postsecondary educational institutions have the option to implement a fixed or escalating course completion rate. For instance, a policy can permit students to complete a lower percentage of their classes in the first academic year but require them to complete an increasing percentage in subsequent years so that they finish their program within the 150 percent maximum time frame.

Executive Summary (continued)

4

Create flexibility in how remedial and repeated courses, transfer credits, and courses not counting towards a new major are treated to maximize access to financial aid.

Institutions should exclude remedial coursework from the maximum time frame calculations. For students who change majors, campuses should also exclude from the SAP determination any course work that does not count towards the new major. Credits earned at other institutions can also be excluded from GPA and maximum time frame calculations. Finally, when courses are repeated, only the higher grade should be included in the GPA calculation.

5

Provide intrusive academic success coaching to all students at risk of losing financial aid.

Intrusive coaching is distinct from other forms of advising in that it is based on deliberate and proactive responses to emerging challenges, such as academic dismissal or financial aid disqualification, and involves staff monitoring students' progress and reaching out as potential problems are identified instead of waiting for students to seek help. Campuses should implement intrusive coaching and ensure it is provided to special student populations, including first-year students, first-generation students, foster youth, and those experiencing homelessness. Coaching should also be provided at critical points, such as when warning signs arise that a student may be struggling – signs such as difficulty with attendance, dropping classes, or poor or declining academic performance.

6

Create appeals protocols that make it as easy as possible for students to file appeals and allow for multiple levels of review.

Instructions for submitting an appeal should be written in student-friendly language that is easy to understand and does not discourage the use of the process or impose barriers such as passing a test to qualify to file an appeal. Ensuring that staff are available to assist students with producing the required documentation can also help students to successfully navigate the appeals process. Decisions should be made within 30 days, and students with a pending appeal should not be disenrolled for nonpayment of tuition or fees. Finally, having a process that allows for a secondary review of a negative decision will help to ensure that appeals decisions are made equitably.

7

Include a broad range of extenuating circumstances in SAP appeals policies.

This allows institutions to take into consideration the life challenges that students from disadvantaged backgrounds are more likely to face, thereby creating more equitable access to financial aid. Such circumstances include not only a death in the family and a student's injury/illness but also changes to employment or economic status, homelessness or housing instability, food insecurity, loss of child-care, or challenges with the transition to college. Further, campuses should not discourage students from requesting appeals by explicitly excluding certain circumstances in their policies such as work conflicts or employment demands, incarceration, or challenges with transportation, living expenses, or childcare.

8

Create opportunities for students who have disenrolled and reentered to regain access to financial aid as quickly as possible.

Students who attempt to reenroll after a period of disenrollment often find that a prior SAP disqualification presents an obstacle to their ability to attempt college a second time. These students remain disqualified from receiving financial aid when they attempt to return to college, regardless of the intervening time frame. Campuses should permit students to appeal upon reenrollment to have their financial aid reinstated for the initial term of reenrollment. Furthermore, students who had a successful appeal before disenrolling should be able to receive financial aid upon their initial term of reenrollment so long as they meet the conditions of their prior appeal.

Executive Summary (continued)

9

Do not impose appeal deadlines or other additional requirements beyond those required by federal law.

JBAY's analysis of policies found that many institutions went beyond federal requirements by imposing additional standards not required by law, such as evaluating SAP based on both cumulative and individual term measures; imposing limits on the number of times a student may request an appeal or creating appeal deadlines; and creating strict limitations on appeal circumstances.

POLICY RECOMMENDATIONS

In addition to policy changes made at the institutional level, broader policy changes can also address the inequities inherent in existing SAP requirements. Changes at the federal level would have the most significant impact, however, state-level changes can be leveraged to create equity-focused policies as well.

Federal changes should include:

1. Expanding the period during which a student can retain financial aid while not making SAP;
2. Requiring all institutions to offer an appeals process and making it more explicit that a broad range of circumstances can be the basis for appeals, and, in particular, highlighting that specific challenges low-income students are more likely to face are valid grounds for appeal;
3. Allowing for reinstatement of financial aid after a period of disenrollment without precondition;
4. Modifying maximum time frame standards;
5. Extending the SAP flexibilities granted to institutions as a result of the COVID-19 pandemic;
6. Identifying funding that institutions can use to create intrusive coaching programs targeting students at-risk of losing financial aid;
7. Requiring institutions to proactively communicate with students about their SAP status; and
8. Requiring institutions to report on SAP disqualifications, including differences across student subgroups and the impact on student retention.

States should determine if a modified SAP standard can be utilized for non-federal financial aid programs, such as the Cal Grant in California, that are not subject to federal standards; ensure that financial aid offices are adequately funded; and predicate funding on the adoption of specific student-friendly policies and processes.



Introduction

Access to higher education – whether for a vocational certificate, associate’s degree, bachelor’s degree, or beyond – is critical to help low-income households move out of poverty. Over time, postsecondary education has become increasingly essential. Between 2010 and 2017, the U.S. economy lost 5.6 million jobs that require only a high school diploma or less, and gained 8.4 million jobs that require a bachelor’s degree.¹ In 2019, workers with a bachelor’s degree earned on average 67 percent more than those with only a high school diploma and were 60 percent less likely to be unemployed.² During the economic downturn triggered by the COVID-19 pandemic, workers with less education have fared worse than those with a college education, exacerbating these trends even further.³

Efforts in the United States to ensure that students from low-income families can attend postsecondary institutions began in the 1960s with the introduction of the Pell Grant (formerly known as the Basic Educational Opportunity Grant), a portable, needs-based form of financial aid for students who demonstrate exceptional financial need. The passage of the Education Amendments of 1972 and the establishment of low-interest student loans further solidified the federal government’s commitment to college access, affordability, and choice. As a result, the number of first-time college students rose and overall enrollment at postsecondary institutions increased dramatically.

In the 1980s, however, a political philosophy was taking hold that featured a reduction in the role of government, an emphasis on personal responsibility, and the development of distinctions between the “deserving” and “undeserving” poor. For example, changes to social safety net programs featured the imposition of substantial new eligibility restrictions, work requirements, and time limits. Financial aid programs were

also modified to adopt a similar philosophy. Citing a review of 20 postsecondary institutions, the Government Accountability Office (GAO) indicated that institutions’ academic policies were “too lenient and inconsistently enforced,” resulting in students “inappropriately accessing” Department of Education funds.⁴ Despite veiling the research methods and statistical analyses that led to that conclusion, the GAO’s recommendations were used to modify federal policy to impose Satisfactory Academic Progress (SAP) standards in 1983 that have remained in place to this day.

Federal SAP regulations were modified as of July 1, 2011, to adopt new “Program Integrity Rules,” which in some cases reduced the amount of time available to students before they lost access to financial aid. Prior to the adoption of these new rules, campuses had additional flexibility and, in some cases, allowed students to receive financial aid for as long as 24 months before being disqualified due to SAP. The new regulations universally limited this timeline to no more than two consecutive terms or one

Introduction (continued)

academic year. In the description of this change, the U.S. Department of Education described this change as necessary to curtail “abuses” of the policy. Such a change was likely warranted in some cases, for example if the flexibility was being abused by a for-profit proprietary institution in ways that were not in the interest of students, but the broad scope of this adjustment likely also reduced flexibility in other cases where flexibility may have been justified.⁵

For low-income students whose academic prospects are already precarious, ongoing access to financial aid is essential to their ability to remain enrolled. As detailed in this report, however, a quarter of first-year students in California are at risk of losing access to financial aid because of SAP standards. Other national studies have found this number to be as high as forty percent. Over the past forty years, the student body in the United States has become more racially and ethnically diverse and includes a greater proportion of first-generation students and students who are parents. Despite both the changing life circumstances that students are now confronting and the enormous impact that SAP requirements have on students’ access to financial aid, the existence of these standards has remained largely unquestioned. Virtually no research has been conducted to evaluate the impact that such standards have on student success and little attention has been paid to how these standards may be exacerbating existing societal inequities and whether these standards should be reexamined.



“I was kicked out of my house and became homeless. Homelessness alone though was not a suitable reason for getting my financial aid back, forcing me to share specific traumatic events to justify regaining my financial aid. In my case, I ended up having to disclose that I had an abortion to get back my financial aid. I was not ready to share about this, let alone share with strangers and it was traumatizing.”

Introduction (continued)

Advocacy efforts related to financial aid have focused primarily on bolstering students' ability to access financial aid upon enrollment as well as on the declining value of available aid over time and the growing reliance on loans. While these are essential issues that continue to create barriers to equitable access to a college education, the issue of students losing their financial aid and the disproportionate impacts that existing SAP policies have on different student subgroups must also be the subject of scrutiny and reform.

While this report focuses on the negative repercussions of the imposition of SAP requirements, it is important to recognize that students must also have the support necessary to be successful in their courses. The availability of financial aid that covers the full cost of attendance and access to a robust array of services that support academic success are equally essential. Modifications to SAP requirements, increased access to financial aid, and strong systems of support are not mutually exclusive but rather are all crucial components of the student success formula.



What Is Satisfactory Academic Progress (SAP)?

The U.S. Department of Education requires academic institutions receiving federal financial aid funds to establish a “reasonable satisfactory academic progress” (SAP) policy for determining whether a student receiving aid is progressing towards program completion in a timely and efficient manner.⁶

SAP standards include a two-part assessment composed of both a quantitative and qualitative measure. Many state programs, including California’s largest financial aid program, the Cal Grant, are linked to these same standards. Although federal statutes and regulations establish a general framework for SAP criteria, each individual institution of higher education is provided significant discretion in how SAP is defined and applied.

SATISFACTORY ACADEMIC PROGRESS (SAP)



qualitative

For programs of more than two academic years, the SAP policy must specify that students have at least a 2.0 cumulative Grade Point Average (GPA) (or equivalent if using an alternative grading system) at the end of their second year or have academic standing consistent with the institution’s requirements for graduation. All other programs, including all programs at community colleges of two academic years or less, have discretion as to the required GPA as long as it is consistent with the school’s graduation standard. There is no requirement that the GPA standard be the same for each year.

quantitative

Institutional policies must include a maximum timeframe for completion that is defined as no longer than 150 percent of the published length of the educational program.

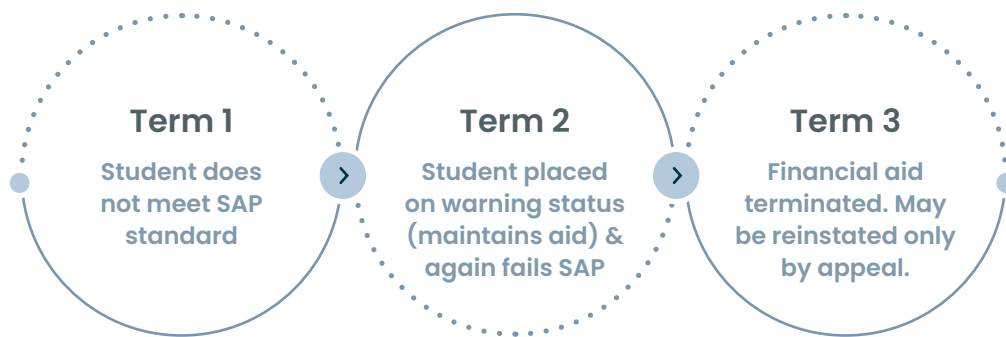
Institutions must establish a cumulative unit completion requirement (the percentage of units attempted that are successfully completed) that allows students to complete their program within the maximum timeframe allotted.

What Is SAP? (continued)

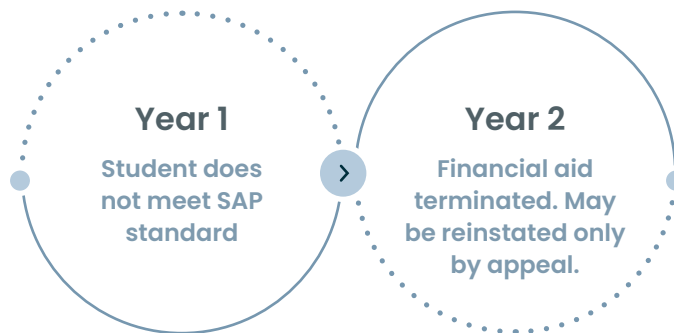
Institutions must evaluate SAP either at the end of each payment period, or annually. Institutions that evaluate SAP every payment period may place a student on “warning” status after the first term of not making SAP. After a second consecutive payment period during which the student fails to meet SAP standards, financial aid must be discontinued, and financial aid can be reinstated only through an appeals process. Institutions that evaluate SAP only once per year do not provide an opportunity for a warning period. Students at these institutions lose eligibility for aid if they do not meet the SAP standard at the point of evaluation, and may regain access to financial aid only through an appeals process or by subsequently meeting the SAP standard.

Students become ineligible to receive financial aid as soon as it becomes mathematically impossible for them to graduate within the maximum 150 percent timeframe.⁷

INSTITUTIONS THAT EVALUATE SAP EACH PAYMENT PERIOD



INSTITUTIONS THAT EVALUATE SAP ANNUALLY



In addition to SAP standards to qualify for financial aid, postsecondary institutions also have academic standards that students must meet to maintain enrollment and successfully graduate. While it is beyond the scope of this publication to review academic dismissal policies, these policies, in general, allow for greater flexibility than do SAP policies.

What Is SAP? (continued)

APPEALS

Federal law allows institutions to offer an appeals process, and institutions are required to clearly state the steps a student would need to take to initiate an appeal of their SAP status. The policy must specify the basis on which students may file an appeal as well as what information students must submit regarding why they failed to make satisfactory academic progress. Students are also required to provide information regarding what has changed in their situation that will allow the student to demonstrate satisfactory academic progress at the next evaluation.

Federal law defines the basis for an appeal as the death of a relative, an injury or illness of the student, or “special circumstances as determined by the institution.” Colleges and universities have discretion to define what constitutes special circumstances at their institution and as discussed later in this report, these policies

vary tremendously by institution. Financial aid may be reinstated upon successful appeal if the student should be able to make SAP during the next term or an academic plan has been developed that would enable the student to meet the institution’s SAP standards by a specific point in time. A student who successfully appeals is then placed on financial aid probation.

Immediately following a payment period on probation, if the student neither makes SAP nor meets the terms of their academic plan, financial aid must be terminated. A student who has not been able to regain eligibility through an appeal can typically regain eligibility only by taking additional courses without the benefit of financial aid until the student increases their GPA and/or course completion rate such that they are in compliance with the school’s SAP standards.



Temporary SAP Changes in Response to the COVID-19 Pandemic

The COVID-19 pandemic brought unprecedented challenges to higher education institutions and students alike. With in-person learning abruptly suspended, institutions were swift to implement countermeasures to ensure that students could continue their studies with the least amount of interruption. Early measures included introducing new academic modalities, such as on-line-only instruction, and expanding support for students who relied on campus services to meet their basic needs such as food and housing.

As the pandemic continued to unfold, legislators and other policymakers took an active role in addressing both the immediate and long-term impacts stemming from the outbreak. In an Electronic Announcement issued on March 5, 2020, the U.S. Department of Education updated the definition for the basis of a SAP appeal to include “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,” and noted that the new circumstances should be considered “even if not specifically articulated in the institution’s SAP policy.”⁸

The Coronavirus Aid, Relief, and Economic Security Act (CARES Act), enacted on March 27, 2020, granted postsecondary institutions the ability to exclude from the SAP calculation courses that a student did not complete as a re-

sult of the public health emergency. Specifically, the legislation allowed campuses to “as a result of a qualifying emergency, exclude from the quantitative component of the [SAP] calculation any attempted credits that were not completed by such student without requiring an appeal by such student.”⁹ The result of this increased flexibility was the removal of attempted units in which students received a withdrawal (W), incomplete (I) or excused withdrawal (EW) from SAP calculations without requiring an explicit request from students to do so. In addition, for students who withdraw as a result of COVID-19, the term of withdrawal is excluded from the lifetime maximum for Pell Grant eligibility.

Subsequent guidance issued by the U.S. Department of Education defined allowable circumstances for utilizing this option as “illness of the student or family member, need to become a caregiver or first responder, economic hardship, added work hours, loss of childcare, inability to continue with classes via distance education, inability to access wi-fi due to closed facilities.”¹⁰ This guidance did not specify an end date to this flexibility and so it remains in place until the end of the public health emergency.

Similarly, to alleviate students’ anxiety and provide “breathing room,” institutions across the country expanded the use of Pass/Fail options which are typically excluded from GPA calculations and limited to courses not included in general education or major requirements.¹¹

Finally, while initial regulations related to emergency funding for students limited eligibility to students who were eligible for federal financial aid, subsequent guidance reversed this policy, allowing students on SAP suspension to access emergency aid.¹²

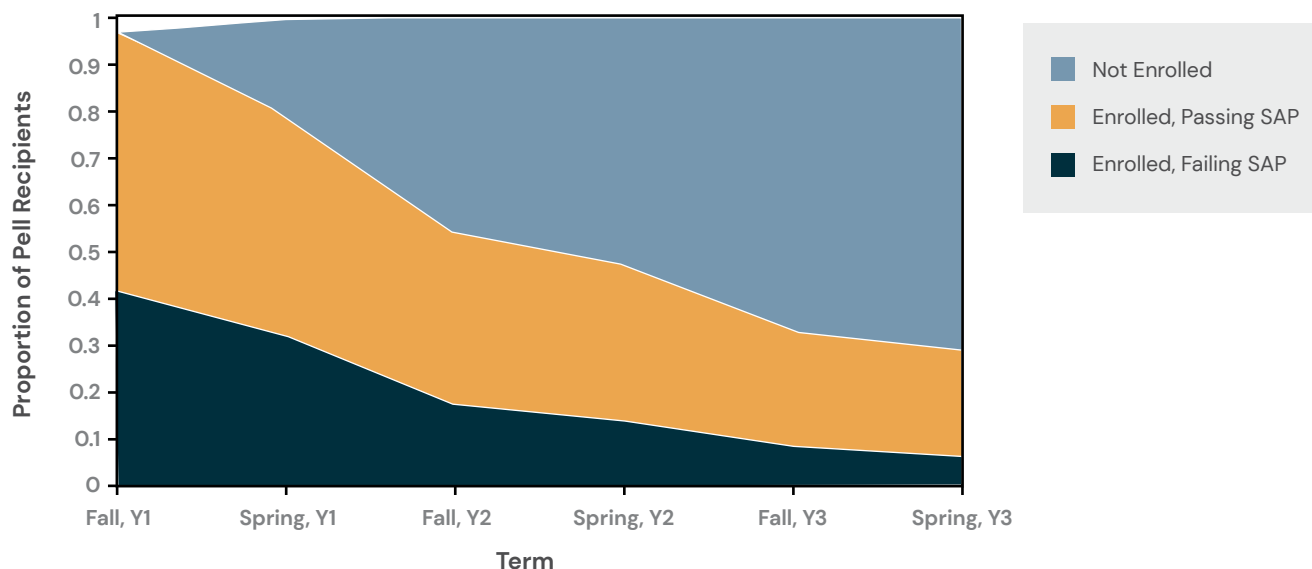
Impact on Students

Despite the large number of students impacted by Satisfactory Academic Progress requirements, there has been little exploration of how these requirements have affected students over the nearly forty years the policy has been in place.

The sole quantitative study that expressly examined this issue utilized administrative data from the National Postsecondary Student Aid Survey along with a closer examination of data representing over 50,000 Pell Grant recipients who were first-year community college students. The study found that approximately one in five (21 percent) first-year Pell recipients nationally were at risk of losing their Pell due to the SAP GPA criterion alone.¹³ At public community colleges, approximately 25 percent of first-year Pell recipients failed to attain a 2.0 GPA in both national and state administrative data. Four-year university students showed a similar rate of GPA failure at 24 percent. When the credit completion requirement was incorporated, the overall first-year SAP failure rate for community college students included in the study approached 40 percent.

The analysis also found that failing SAP decreases the rate of persistence into the subsequent year. While the rate of SAP failure progressively declines each year, this is “not because students improve their GPAs overall (though, of course, some do) but because many students simply do not reenroll, and those who fail SAP are disproportionately more likely to drop out (29 percent of Pell Grant recipients who fail SAP in the first term do not return in the spring, compared with just 13 percent of Pell Grant recipients who meet SAP standards).”¹⁴ The biggest enrollment drop, however, occurs between the spring of the first year of enrollment and the following fall, correlating with the point that financial aid is likely to be withdrawn. (Figure 1).¹⁵

Figure 1: Federal Pell Grant Entrants’ Enrollment by SAP Status Across Academic Terms



Source: *Pell Grants as Performance-Based Aid? An Examination of Satisfactory Academic Progress Requirements in the Nation's Largest Need-Based Aid Program* by Lauren Schudde and Judith Scott-Clayton

Impact on Students (continued)

Publicly available data from the National Post-secondary Student Aid Survey (NPSAS) from the 2015/2016 academic year echoes these findings. Among all Pell Grant recipients nationally, 20.2 percent fell below a 2.0 GPA. Rates at public 2-year and 4-year institutions did not vary significantly (21.3 percent vs. 20.4 percent). The rates at private non-profit 4-year institutions were somewhat lower at 13.6 percent. In California, the overall rate was a bit higher at 22.3 percent, with more variation across institution types. At public 2-year institutions 23.8 percent of students fell below a 2.0 GPA and public 4-year institutions had a 15.2 percent rate. The rates at private non-profit 4-year institutions were noted as unreliable and are therefore not being reported. NPSAS data does not include course completion rates, and so it is likely that the combined rate of SAP failure is higher than these numbers when both criteria are incorporated.¹⁶

A study published in 2021 relied on semi-structured interviews with community college students who were or were not meeting SAP to identify differences between the two groups and implications of these differences. The study notes that the SAP criteria adopted in the early 1980s “appear to reflect a middle-class lens (i.e., families are able to support students, students can primarily focus on their studies, and students’ lives are relatively stable with minimal disruptions) and do not appear to be based on any scientific evidence.”¹⁷

The author found no differences in the level of motivation between students who were making SAP and those who were not. Students who were not making SAP, however, had significantly more life responsibilities (childcare, employment, family responsibilities, etc.) and fewer resources (family support, reliable transportation, access to food and housing, flexible work schedule,



Impact on Students (continued)

etc.). Those not making SAP also had less access to cultural capital that could help them understand how to navigate college inside and outside the classroom. These students also experienced greater feelings of powerlessness as a result of facing experiences such as homelessness, child welfare system involvement, witnessing family abuse, and extreme financial hardship.

The author found that “the SAP criteria do not appear to produce an incentivizing effect and, perhaps more than producing a discouraging effect, create a substantive barrier for financially eligible Pell Grant community college students.” She goes on to note that “the criteria divided students by access to sufficient resources, cultural capital, and powerlessness. Thus, the SAP criteria appear to reproduce inequities—penalizing the poor (responsibilities to resources ratio) who do not understand how the system works (cultural capital) furthering their disempowerment (powerlessness) rather than gatekeeping students trying to take advantage of the system.”¹⁸

“After emancipating from the foster care system at 18, I enrolled at a Cal State, but without family support I became homeless and had to withdraw. I got my grades up at a community college, was reaccepted to the Cal State, and got my financial aid reinstated, but I became homeless a second time because of domestic violence and got several incompletes. I was eventually able to find stable housing, but when I tried to reenroll, I was told that I couldn’t get financial aid because of satisfactory academic progress requirements. Although my GPA was 2.7, my withdrawals disqualified me from financial aid. I didn’t get a decision on an appeal in time to be able to enroll for this semester and so I’m not in school now. I hope I can find a way to return as I have just 24 units left to complete my bachelor’s degree but there is no way that I can pay for tuition without financial aid.”

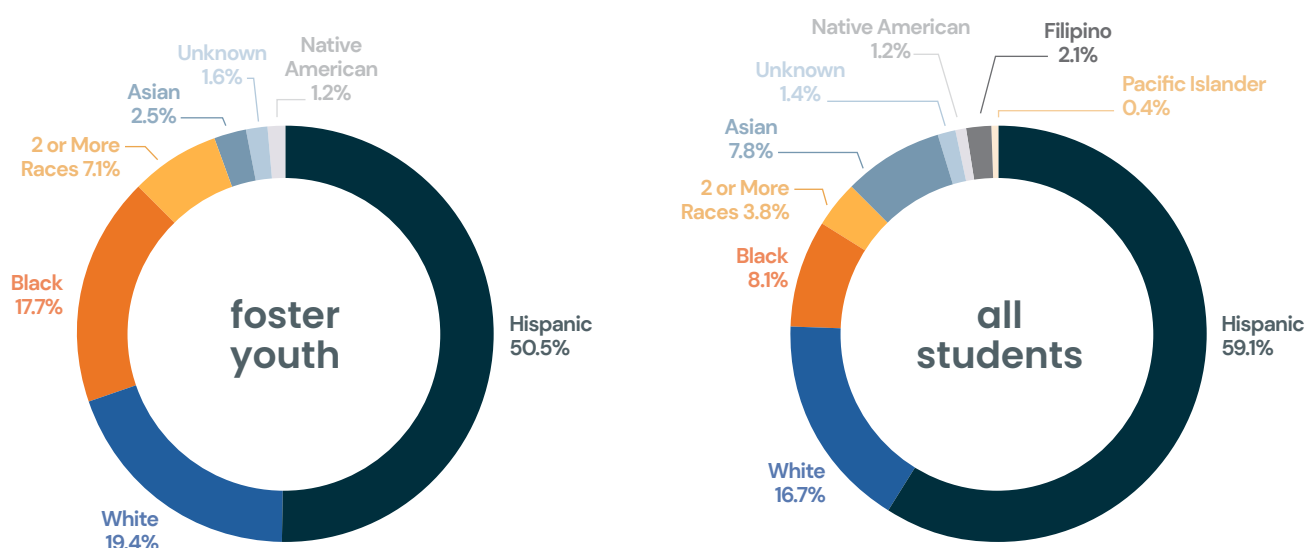


Analysis of SAP Status and Enrollment Trends at California Community Colleges

The California Community College system is the largest public postsecondary system in the country, serving over 2.1 million students annually across 116 campuses. To understand the scope of this issue more fully at California's community colleges, JBAY received aggregated data from the Cal-PASS Plus system, managed by Educational Results Partnership, that included all students who enrolled in a California Community College for the first time in Fall 2017 and received a Pell Grant.^b This cohort included a total of 76,125 Pell Grant recipients and was disaggregated by race/ethnicity. Hispanic students represent the largest subpopulation (59 percent), followed by white students (17 percent) and Black students (8 percent). (Figure 2).

The California Community College data system includes a flag for students who self-identify as having experience in the foster care system. Data for this specific subpopulation was also disaggregated and includes a total of 2,053 first-year Pell Grant recipients. Numerous studies have demonstrated that foster youth experience educational outcomes far below those of their peers. For this reason, as well as the unique obligation that the state has to foster youth, these students are of particular interest to the authors of this report and are disaggregated in this analysis. It is noteworthy that Black students are overrepresented within the foster youth population when compared to the general student population (Figure 2).

Figure 2: California Community College Pell Grant recipients first enrolled in Fall 2017



^b For consistency in data analysis, students enrolled in the three colleges on a quarter system were excluded.

Analysis of SAP Status and Enrollment Trends (continued)

SAP STATUS

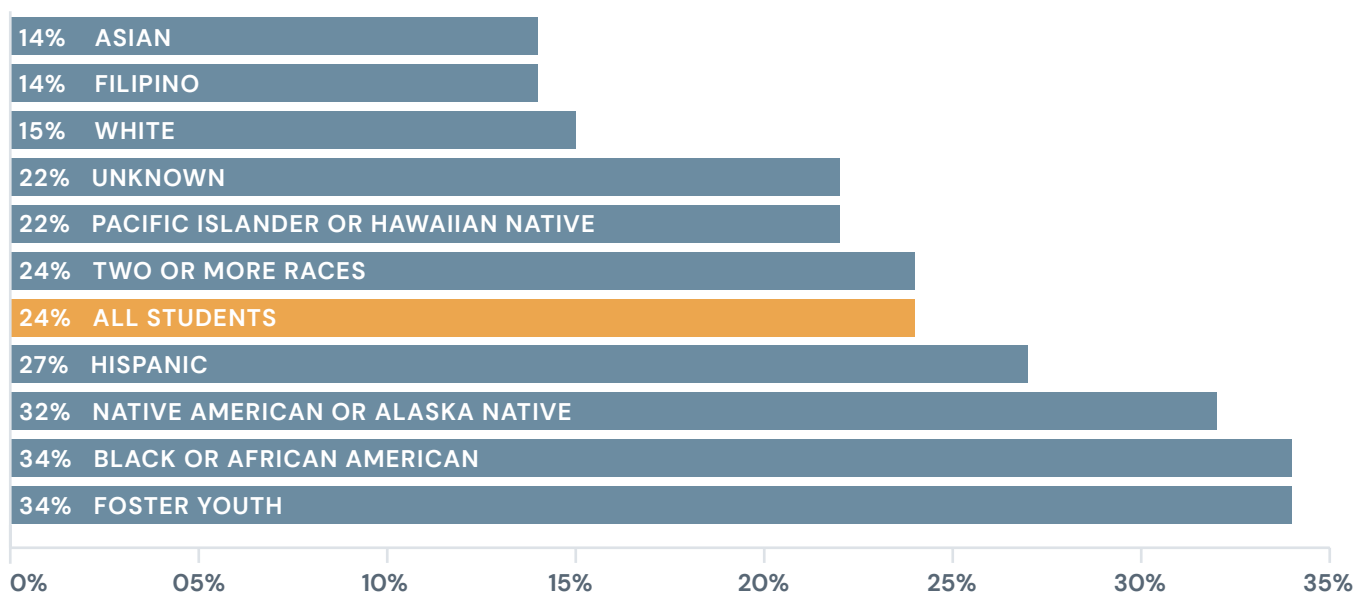
A proxy measure was created for SAP status based on whether students had maintained a cumulative 2.0 GPA and 67 percent course completion rate at the end of each semester, the measures most commonly used in institutional SAP policies. Among all Pell Grant recipients, 36 percent of students did not achieve SAP during their first semester. Both GPA and course completion standards contributed to the overall rates of SAP failure, with GPA failure being slightly more prevalent than course completion failure. Among all students, 32 percent did not attain a 2.0 GPA and 26 percent did not complete at least 67 percent of courses.

Of those who remained enrolled for the full year, roughly one in four students did not make SAP during both the fall and spring terms, thus disqualifying them from obtaining a Pell Grant, along with most other state and federal financial aid, without a successful appeal. Black and Native American students did not make SAP at a rate double that of white and Asian students. Over a third of foster youth overall failed to make SAP. (Figure 3) For Black students with experience in foster care, the rate rose to 42 percent. These disparities should not be construed as a failure on the part of the students, but rather as evidence of the continued failure of our systems, both within education and elsewhere, to adequately address and remedy the historic and ongoing inequities faced by these subgroups.

Among foster youth, Black, and Native American Pell Grant recipients, over one-third have been disqualified from financial aid after their first year.



Figure 3: Percent of students who remained enrolled for first two consecutive terms and failed to make SAP in both terms



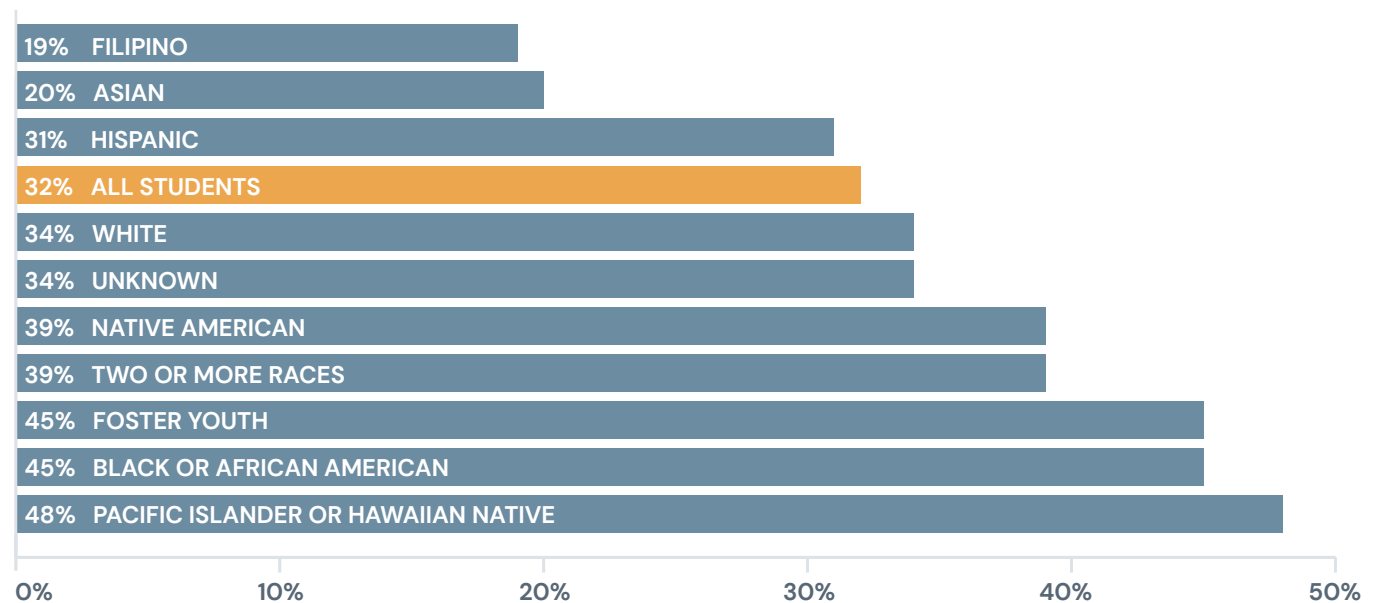
Analysis of SAP Status and Enrollment Trends (continued)

CONTINUING ENROLLMENT

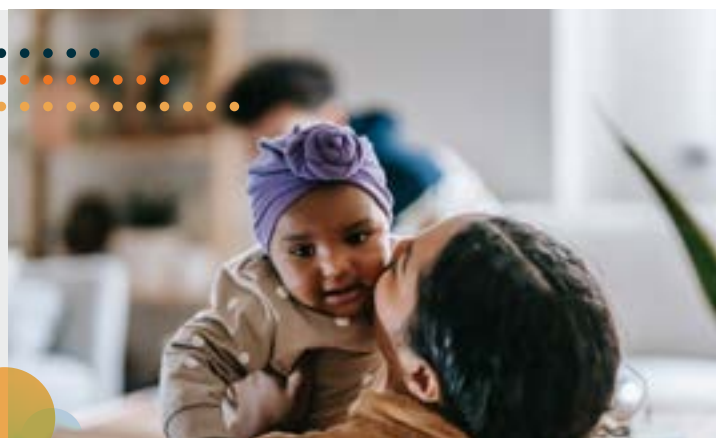
As this cohort of students moved into their second semester 15 percent disenrolled. Pacific Islander students were the most likely to have left school (26 percent) along with Black students (25 percent) and foster youth (24 percent). Native American students and students of two or more races were also slightly more likely than average to disenroll. Among Black foster youth, close to one-third departed college after their first term.

By the time these students reached their second year of college, the rate of disenrollment had doubled. Students identified as Pacific Islander, Black, or foster youth were the least likely to remain enrolled, all with disenrollment rates of between 45–48 percent (Figure 4).^c While some students may have disenrolled due to a positive outcome (e.g., completing a short-term certificate program) it is more likely that these students left college without achieving their desired educational goal.

Figure 4: Percent of all students who are no longer enrolled after first year



"I had been in a continuation school since the 5th grade and didn't get much of an education and so when I entered college at 18, I was very unprepared and ended up dropping out. I returned to college eight years later but was told I had to make SAP for a full year before I could get any financial aid because I had failed SAP when I left eight years ago. I'm a single mom now and although I've managed to get good grades so far, it's been a huge struggle."

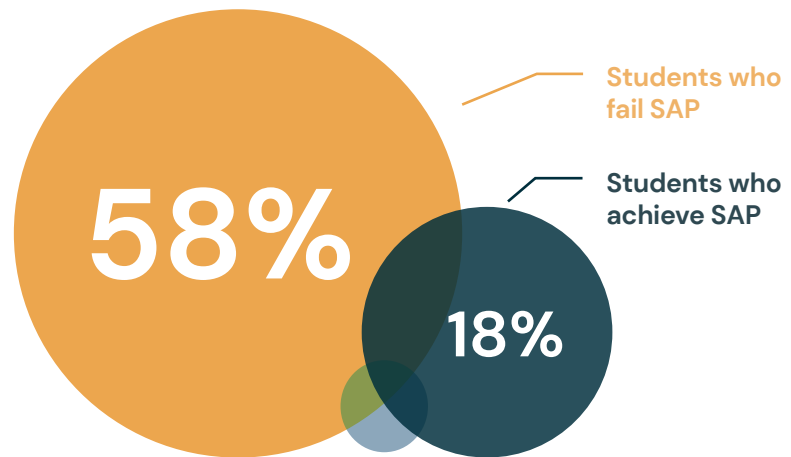


^cFoster youth were not counted separately from the overall race/ethnicity subgroups and therefore there is overlap between foster youth and each racial or ethnic subgroup reflected in the figure.

Analysis of SAP Status and Enrollment Trends (continued)

When this same metric was examined for just those students who did not make SAP during their first two terms, the rate of disenrollment was over three times the rate for those who do achieve SAP. **Fifty-eight percent of students who failed SAP during their first year did not return for a second year.** (Figure 5)

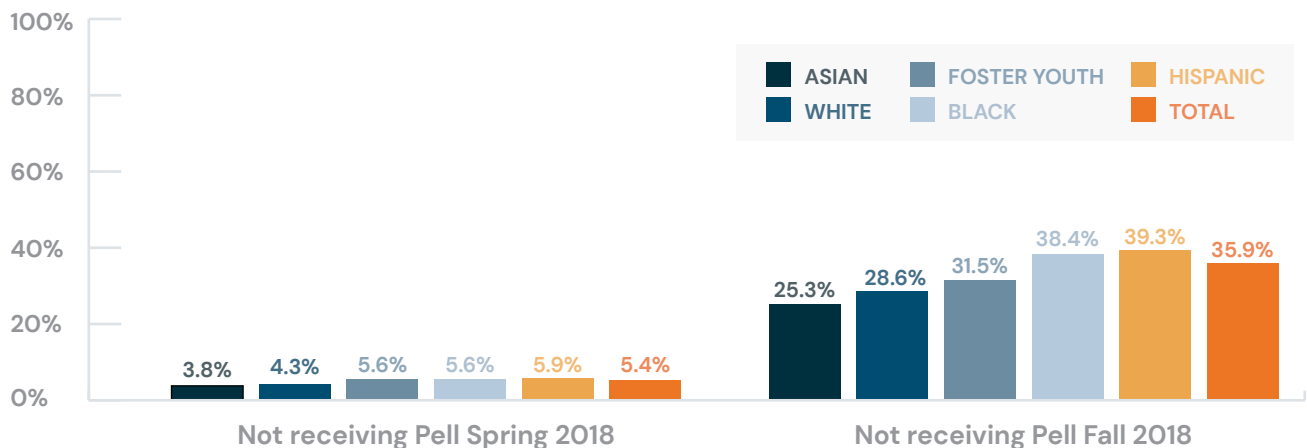
Figure 5: Percent of students who fail to enroll for a third term



PELL GRANT RECEIPT

After the first term, of those who did remain enrolled, regardless of SAP status, just over five percent were no longer receiving a Pell Grant. As students entered their second year, however, this number increased sharply. During the Fall 2018 term, the percent of students enrolled but no longer receiving a Pell Grant rose to 36 percent. (Figure 6) While there are various reasons that a student could lose access, including no longer meeting income and/or asset criteria or failing to complete a FAFSA, this significant increase in Pell loss following the first year points to the likelihood of SAP's significant effect on whether students retain their Pell Grant.

Figure 6: Pell Grant Loss During Second and Third Terms



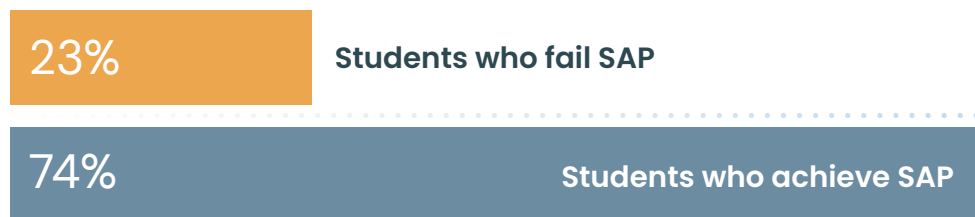
Asian and white students were less likely to lose financial aid than other students, which is in keeping with the disparities in SAP rates discussed previously. Foster youth also showed higher rates of Pell Grant loss than non-foster youth.

Analysis of SAP Status and Enrollment Trends (continued)

Among those who did not make SAP during the first two consecutive terms but who remained enrolled, 23 percent were receiving a Pell Grant, most likely due to a successful appeal. (Figure 7) In this case, the students most likely to have retained their award are foster youth (37 percent) and Black students (30 percent). One possible explanation for this is that these students did not have the resources to remain enrolled without access to federal financial aid. It therefore may be an indication that these students were less likely to remain enrolled without access to aid, leaving a higher percentage of those who did remain with a Pell Grant. It is also worth noting that in some cases these students may have remained eligible for a California College Promise Grant, which pays tuition costs at California community colleges. While it is beyond the scope of this report to examine how the Pell Grant and Promise Grant interact and influence retention, such research could shed additional light on the impact of SAP.

It is significant that a substantial number of students attempted to remain enrolled despite the loss of their Pell Grant. This points to the likelihood that there were many students who were strongly motivated to continue their higher education who were denied equal access to ongoing educational opportunities because of the loss of the Pell Grant along with other financial aid linked to SAP.

Figure 7: Percent of students who maintain financial aid in their third term



COMBINED IMPACT OF SAP ON ENROLLMENT AND PELL GRANT RECEIPT

The number of students who did not make SAP during their first two consecutive terms and who had either disenrolled or lost their Pell Grant by their second year is an astounding 87 percent. The implication of these data is that SAP standards have an enormous impact on whether students who struggle academically during their first year have equitable access to the resources needed to continue their academic pursuits.

These data also demonstrate that just thirteen percent of students who did not make SAP during their first two consecutive terms were able to successfully navigate the appeals process to retain aid and remain enrolled. While it was beyond the scope of the report to analyze use of the appeals process, these data point to a need to better understand current barriers to successful use of the appeals process and corresponding academic planning to enable students to maintain financial aid and move towards academic success. Students may be unaware of the option for appeal or may not be equipped to navigate the process without assistance. Arbitrary deadlines may limit some students' options, and stringent criteria for a valid basis for appeal may also discourage students from pursuing appeal or may result in large numbers being denied. The recommendations that follow offer suggestions for addressing these potential obstacles.

Analysis of SAP Status and Enrollment Trends (continued)

CONCLUSIONS

The metrics above present a troubling narrative regarding students' ability to remain enrolled and maintain financial aid after the crucial first year in college. Significant numbers of low-income students who are struggling to find their way through a major life transition are being shut out of access to higher education after a single year.

The differences across ethnic groups and between foster youth and non-foster youth also point to the disparate impact that SAP policies have on different student populations. Reducing equity gaps in higher education has been identified as a top priority by all three public post-secondary education systems in California as well as many other institutions of higher education nationwide. The factors that have led to existing equity gaps are complex and involve systemic barriers often beyond the scope of influence of colleges and universities. Once these students arrive, however, on a college campus, these institutions can help to repair these inequities.

These findings demonstrate that current SAP policies, rather than serving the larger goal of closing equity gaps, instead serve to largely reinforce the institutional racism that has put these students at a disadvantage in the first place. The intention of financial aid is to offer low-income students the same economic benefit that higher income students have. SAP requirements, however, counteract this goal of leveling the playing field.

"During my second year of school, my mother died and I was diagnosed with a heart condition. Despite these pervasive challenges, I was only granted an appeal for one full semester and lost my financial aid the next term. I couldn't attend school without financial aid and was forced to leave. I felt like the school expected me to get over my mom's death in one semester, but grief is different for everyone. I didn't have the time or space I needed to heal."



Strategies to Implement Equity-Based Institutional SAP Policies

For college and university students, access to financial aid has been cited as key to addressing basic needs (i.e., food and housing) insecurity, improving academic outcomes, and addressing racial inequities. While much attention has been paid to the need to expand financial aid access at the beginning of a student's academic career, virtually no attention is given to whether students are subsequently able to maintain financial aid once enrolled.

Based on both a review of federal laws and regulations and the policies in place at California's public institutions, several areas were identified where policy and practice enhancements can be adopted by institutions to remove barriers for students in meeting SAP and maintaining financial aid. Appendix A includes a chart that provides an abridged description of the federal SAP requirements, areas where institutions have discretion, and real-world examples of campuses that have adopted equity-based policies and practices. It is recommended that campuses conduct a thorough review of existing SAP policies and practices to identify unnecessary barriers and change policies accordingly. Appendix B of this publication includes a tool to assist campuses with conducting such an audit. Note that while policies can be an effective tool to spur institutional change, they must also be met with adequate staffing, training, and resources to ensure students receive consistent individualized support.

1

Evaluate Satisfactory Academic Progress (SAP) in such a way that allows students the maximum amount of time to retain financial aid while also offering ample warning of potential disqualification.

Federal regulations indicate that students can fail to meet SAP for only one academic year or two consecutive terms before disqualification. Institutions are required to evaluate SAP on an annual basis but may choose instead to evaluate SAP at the end of each academic term. Which option is preferable depends on whether a campus operates on a semester or quarter system.

An evaluation by term allows institutions to provide a warning period before discontinuing aid and is ideal for semester-based institutions. A term-based evaluation at a quarter-based institution, however, can result in the discontinuation of aid at the end of two quarters, rather than enabling a student to maintain aid for a full academic year. Campuses on a quarter system should consider an annual review for formal SAP compliance, while simultaneously implementing an early alert system to ensure that students are informed that they are at risk of losing financial aid after any quarter in which they do not make SAP. Creating warning systems provides an opportunity to coordinate on-campus supports to facilitate improved academic performance. Collaboration with faculty, counselors and other student equity/support programs is a crucial when establishing early alert and intervention programs.

Strategies to Implement Equity-Based Institutional SAP Policies (continued)

2

Implement an escalating GPA structure.

While nearly all public postsecondary educational institutions in California have a minimum cumulative GPA requirement of 2.0 for graduation, federal regulations do not stipulate that a 2.0 GPA must be the standard for each SAP review period. In fact, the Federal Student Aid (FSA) Handbook issued by the U.S. Department of Education notes that “Having a standing consistent with the requirement for graduation means you could use an escalating GPA instead of a fixed one. For example, if your school uses a 4-point scale, it could require students to have a 2.0 average by graduation but allow their average to be lower earlier in their program.”¹⁹ Escalating GPA requirements are already in effect at several public postsecondary institutions in California and build in an additional layer of flexibility for students, particularly those who have recently matriculated, to meet and maintain SAP.

For example, [Cal State Fullerton](#), [CSU Dominguez Hills](#), and [CSU San Bernardino](#) evaluate SAP using an escalating minimum cumulative GPA structure based on the number of units completed. Students who have completed between 0–29 units must obtain a 1.5 GPA, those completing between 30–59 units must sustain a 1.8 GPA, and only once a student has completed 60 or more units are they required to sustain a 2.0 GPA. At [College of the Desert](#), [Evergreen Valley College](#), and [Imperial Valley College](#) students must maintain a cumulative GPA of 2.0 or higher only once they have completed 12 or more units.

In addition, campuses should evaluate SAP based on the cumulative GPA only. There is no requirement that campuses also evaluate the individual term GPA and yet some campuses have chosen to include such a requirement in their policies. Campuses should also avoid setting GPA standards that are more stringent than those required by federal regulations.

SAMPLE SAP POLICY LANGUAGE FOR PROGRAMS LONGER THAN TWO ACADEMIC YEARS (SEMESTER INSTITUTION):

Grade point average is monitored each semester as noted below:

UNDERGRADUATE	CUMULATIVE UNITS COMPLETED	REQUIRED MINIMUM CUMULATIVE GPA
FRESHMAN	0–29 CUMULATIVE UNITS	1.5 GPA
SOPHOMORE	30–59 CUMULATIVE UNITS	1.8 GPA
JUNIOR / SENIOR	60+ CUMULATIVE UNITS	2.0 GPA

Note: If a student has a GPA lower than a 2.0 earlier in the program, they will have to attain a GPA higher than a 2.0 in later terms in order to achieve the required cumulative 2.0 by graduation.

SAMPLE SAP POLICY LANGUAGE FOR PROGRAMS LESS THAN OR EQUAL TO TWO ACADEMIC YEARS:

Students must have a cumulative grade point average (GPA) of 2.0 by graduation. In line with the requirements for graduation, students will be evaluated using an escalating GPA. This means that students must maintain a cumulative GPA of 2.0 or higher if they have completed 12 units or more.

Strategies to Implement Equity-Based Institutional SAP Policies (continued)

3

Implement a graduated course completion percentage.

Similar to GPA requirements, federal regulations authorize postsecondary educational institutions to implement a fixed or escalating course completion rate. If a fixed standard is used for each year, the standard would need to be set at 67 percent. However, the FSA Handbook states that “you can use a graduated completion percentage for each year of a program. For instance, your policy can permit students to complete a lower percentage of their classes in the first academic year but require them to complete an increasing percentage in subsequent years so that they finish their program within the 150 percent max timeframe.”²⁰ The example offered is a policy that requires students to complete at least half of the credits they attempt in their first year and 75 percent of credits they attempt in each subsequent academic year.

Graduated course completion percentage requirements are already in effect at several postsecondary institutions in California but are not widely utilized. The campuses that do adopt the graduated requirements provide incoming students additional time to gain academic skills and access services and supports to address both academic and non-academic related needs. This additional time is critical for first generation students and other students facing challenges, including foster youth.

For example, [UC San Diego](#) evaluates SAP using an escalating course completion percentage based on attempted units. Students who have attempted between 0–44 units must complete 30 percent of courses. For those who have attempted between 45–89 units the rate is 50 percent, and only once a student has attempted 90 or more units does the rate rise to 66 percent. [Butte College](#) requires a 50 percent cumulative course completion rate for students with fewer than 18 attempted units and a 66.66 percent completion rate for all others.

In addition, campuses should evaluate the course completion rate based on the cumulative rate only. There is no requirement that campuses also evaluate the individual term completion rates and yet some campuses have chosen to include such a requirement in their policies. Campuses should also avoid setting standards that are more stringent than those required by federal regulations.

SAMPLE SAP POLICY LANGUAGE FOR PROGRAMS LONGER THAN TWO ACADEMIC YEARS (QUARTER INSTITUTION):

Students must have a cumulative course completion rate of 67 percent by graduation, which is calculated by dividing the cumulative number of courses successfully completed by the cumulative number of courses attempted. In line with the requirements for graduation, students will be evaluated using a graduated course completion rate. This means that while a student may have a completion rate as low as 30 percent earlier in the program they must be able to achieve an overall 67 percent completion rate by graduation, as detailed in the criteria below.

UNDERGRADUATE	CUMULATIVE UNITS COMPLETED	REQUIRED CUMULATIVE COURSE COMPLETION % (PACE)
FRESHMAN	0–44 CUMULATIVE UNITS	30%
SOPHOMORE	35–89 CUMULATIVE UNITS	50%
JUNIOR / SENIOR	90+ CUMULATIVE UNITS	66%

Note: If a student has a course completion percentage lower than 67 percent earlier in the program, they will have to attain a percentage higher than 67 percent to achieve the required cumulative 67 percent pace of progression by graduation

Strategies to Implement Equity-Based Institutional SAP Policies (continued)

SAMPLE SAP POLICY LANGUAGE FOR PROGRAMS LESS THAN OR EQUAL TO TWO ACADEMIC YEARS:

Students must have a cumulative course completion rate of 67 percent by graduation, calculated by dividing the cumulative number of courses successfully completed by the cumulative number of courses attempted. In line with the requirements for graduation, students will be evaluated using a graduated course completion rate – meaning that students must complete at least 67 percent of the units attempted if they have completed 18 units or more. Students who have under 18 completed units must complete at least 50 percent of their units attempted.

4

Create flexibility in how remedial and repeated courses, transfer credits, and courses not counting towards a new major are treated to maximize access to financial aid.

Federal standards provide institutions flexibility in how they evaluate certain types of courses. For example, institutions are not required to include remedial coursework in the pace of completion or maximum time frame components of SAP.²¹ To ensure that students have ample time to complete their programs, institutions should exclude remedial coursework from the maximum time frame calculations. Campuses also have the option to provide students who change academic majors the option of excluding course work that does not count towards the new major from the SAP determination, and this option should be made available to these students.²²

For example, [Los Angeles Mission College](#) and [Los Angeles Pierce College](#) have policies that exclude remedial coursework or English as a Second Language (ESL) courses from the Maximum Time Frame calculation. [San Francisco State University](#) allows students to appeal the maximum time frame criteria based on a change of academic major.

Another strategy for helping students maintain access is to only include the higher grade in the GPA calculation when courses are repeated. [Imperial Valley College](#) includes such a provision in their policy. [Cal Poly San Luis Obispo](#) allows undergraduate students to repeat a maximum of 16 units for purposes of improving their GPA. If the repeat grade is higher than the first, then it replaces the first grade in the GPA computation.

SAP regulations also offer flexibility to institutions in how credits transferred from other institutions are treated. Hours accepted toward a student's educational program must count as both attempted hours and completed hours when calculating pace for satisfactory academic progress but may be excluded from the GPA calculation.²³ [Copper Mountain College](#), for example, excludes transfer grades from the GPA calculation.

In addition, courses and grades earned at prior institutions that are not transferred to the new institution can be excluded from the maximum time frame calculation.²⁴ This latter allowance is particularly important, and campuses should enact policies that exclude courses that are not transferred from their maximum time frame calculation. [Cal Poly Pomona](#) automatically excludes any units from a 2-year institution that are in excess of 70 units from the Maximum Time Frame calculation, and students with additional transfer credit not already excluded in the initial calculation may submit a request to have the credit(s) excluded if it cannot be used to meet any Cal Poly Pomona degree requirement including general electives.

Strategies to Implement Equity-Based Institutional SAP Policies (continued)

5

Provide intrusive academic success coaching to all students at risk of losing financial aid.

Placing students on warning status affords institutions the opportunity to provide high-touch, intrusive academic success coaching. Distinct from other forms of advising, intrusive coaching is based on deliberate and proactive responses to emerging challenges, such as academic dismissal or financial aid disqualification, and involves staff monitoring students' progress and reaching out as potential problems are identified instead of waiting for students to seek help. This approach designates specially trained advisors or "coaches" to work one-on-one with students to actively mitigate both academic and non-academic challenges before they result in the loss of financial aid. This allows students with less cultural capital to receive additional support through warm referrals to campus and community resources that can help them build connections, meet their underlying needs, and refocus on their educational pursuits. Going beyond simply providing contact information for services, a warm referral involves taking steps to ensure that the student has connected with the resource and is receiving necessary services.

Intrusive coaching has been shown to result in higher retention, academic performance, and financial aid receipt for at-risk student populations.²⁵ It has also been linked to improved student confidence in degree planning and

increased help-seeking behaviors.²⁶ While research on intrusive coaching is emergent, there is general agreement on the common indicators and early warning signs that warrant the onset of coaching.

warning signs

Students exhibiting difficulty with attendance, poor or declining academic performance, changes in behavior, or who drop classes should be considered for intrusive coaching. Students can be evaluated for services at critical touch points such as after midterms and finals, as drop and withdrawal deadlines approach, and at the end of each term.

population specific

First-year and special student populations, such as foster youth and students experiencing homelessness or food insecurity, should also be prioritized for intrusive coaching when needed based on inherent challenges and risk factors.

"I felt pressured to take enough classes to graduate and maintain eligibility for EOPS, so I ended up overloading myself with too many courses. And, honestly, I overestimated my ability to complete all the classes. At the time, I was also struggling with my disabilities, which were getting worse, and I had to drop classes which made my course completion rate plummet. Thankfully, EOPS provided coaching and I was able to successfully appeal to have my financial aid reinstated and come up with a manageable academic plan moving forward."

Strategies to Implement Equity-Based Institutional SAP Policies (continued)

An example of such a program is the [REBOUND](#) program at Barstow College, a program funded by Student Equity and Achievement dollars, designed to provide academic support and encouragement for students on academic probation and at risk of dismissal. Participants of the REBOUND program receive one-on-one support to identify and address both academic and non-academic needs, and can attend workshops on time management, campus resources, and succeeding in online courses. A major focus of the one-on-one support is ensuring students enroll in appropriate courses in which they can perform well to bring up their cumulative GPAs and move off probation. The program counselors hold regular check-ins and review progress reports mid-semester to track student achievement and make referrals to tutoring, if necessary. The REBOUND program also provides incentives to encourage student participation, including a book voucher up to \$200 and a \$50 gift card for school supplies.

As noted in the policy recommendations later in the report, additional funding to colleges to implement an intrusive coaching program would enable more institutions to adopt such a strategy.

6

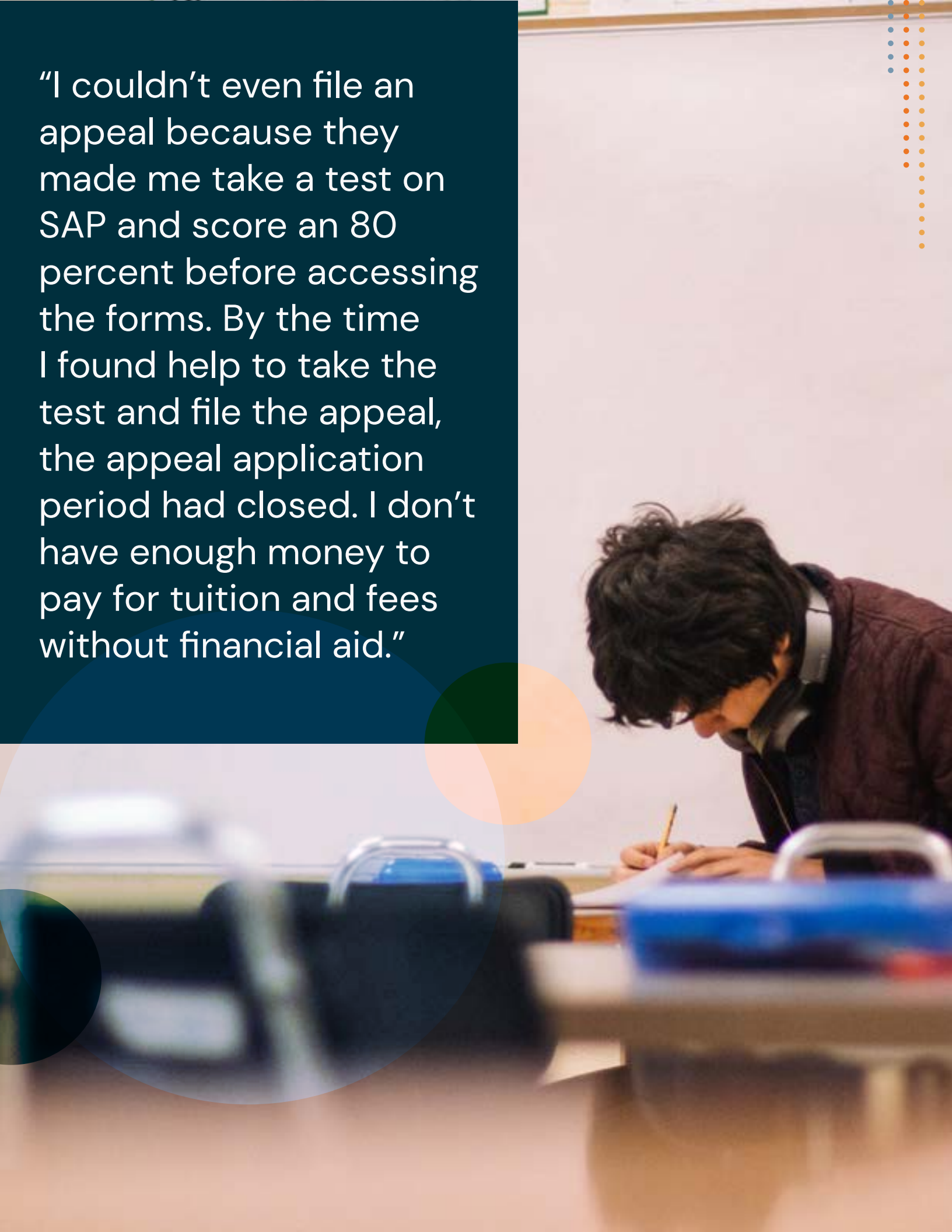
Create appeals protocols that make it as easy as possible for students to file appeals and allow for multiple levels of review.

Protocols for submitting an appeal should be as barrier-free as possible and should facilitate the use of the appeals process. For example, campuses should allow appeals to be submitted through various mechanisms including electronically, by mail, or in person. Instructions for submitting an appeal should be written in student-friendly language that is easy to understand and that does not discourage students from submitting an appeal or impose barriers such as passing a test to qualify to file an appeal. For example, providing a list of reasons that will not be considered grounds for appeal could discourage a student from using the process. Ensuring that staff are available to assist students with producing the required documentation can also help students successfully navigate the appeals process.

Once an appeal is received, processing it as quickly as possible will help to avoid disruption to a student's academic path and should take no longer than 30 days. In addition, processes should be developed in coordination with student business services to ensure students with a pending appeal are not disenrolled for nonpayment of tuition or fees. Finally, having a process that allows for a second-level review of a negative decision will help to ensure that appeals decisions are being made equitably.

Examples of campuses with such policies include [Los Angeles City College](#), which offers students the opportunity to submit a second-level petition if the initial appeal request is denied. [Copper Mountain College's](#) policy states that appeals decisions will be made within seven business days. [CSU Long Beach](#) evaluates appeals within three weeks and allows for students to challenge an appeal denial.

"I couldn't even file an appeal because they made me take a test on SAP and score an 80 percent before accessing the forms. By the time I found help to take the test and file the appeal, the appeal application period had closed. I don't have enough money to pay for tuition and fees without financial aid."



Strategies to Implement Equity-Based Institutional SAP Policies (continued)

7

Include a broad range of extenuating circumstances in SAP appeals policies.

Schools may permit appeals when a student loses their financial aid because they did not meet SAP. According to the FSA Handbook, students may appeal based on special circumstances.²⁷ Including a broad range of extenuating circumstances allows institutions to take into consideration the life challenges that students from disadvantaged backgrounds are more likely to face, thereby creating more equitable access to financial aid. Enabling as many students as possible to successfully appeal also provides the institution with additional time to provide services to the student to help them regain their academic standing.

Further, campuses should not discourage students from requesting appeals by explicitly excluding certain circumstances in their policies such as work conflicts or employment demands, incarceration, or challenges with transportation, living expenses, or childcare. Policies should make clear that any published list of circumstances is not exhaustive and that there could be other valid reasons for an appeal.

For example, [Feather River College](#) permits appeals on the basis of illness or injury, family problems, inability to access support services, and/or change in financial status. They also make special consideration for CalWORKs, EOPS, DSPS, and veteran students.

[CSU Channel Islands](#) specifically allows circumstances related to financial difficulties, interpersonal problems, and difficulties balancing school/work/family responsibilities.

SAMPLE SAP POLICY LANGUAGE

Students may appeal their financial aid disqualification if they were unable to maintain satisfactory academic progress due to extenuating circumstances, including, but not limited to, the death of a close relative or friend; injury, illness, disability, hospitalization, or other medical circumstance of the student, a relative, or close friend; change in their own or their parents' (if dependent) economic status; divorce or separation; domestic abuse; being the victim of a crime or sexual harassment; difficult transition to college; change in employment, including job loss or pay cut; loss of child care; or homelessness or risk of homelessness.



Strategies to Implement Equity-Based Institutional SAP Policies (continued)

8

Create opportunities for students who have disenrolled and reentered to regain access to financial aid as quickly as possible.

Students who attempt to reenroll after a period of disenrollment often find a prior SAP disqualification presents an obstacle to their ability to attempt college a second time. These students remain disqualified from receiving financial aid when they attempt to return to college, regardless of the intervening time frame. In this way, challenges faced by students early on in their academic career may continue to impede their progress for years into the future.

At many campuses, students are barred from receiving financial aid until they fully comply with the institution's SAP policy. Depending on the cumulative GPA and completion rate the student maintained upon exiting and the number of units in which the student can enroll when they return, the student may be subject to multiple terms of disqualification before aid can be restored. A student who experiences challenges early in their academic career may leave school but ultimately return later in life when they are in a better position to be successful. These students experience a catch-22 where they cannot receive financial aid until they succeed in courses, but they cannot succeed in courses without access to financial aid.

An example of a campus with a policy to mitigate this catch-22 is Riverside City College, which permits students to file an appeal immediately upon reenrollment, increasing the likelihood they will receive aid for their initial term. Riverside also allows students with prior appeals who are on financial aid probation to disenroll and reenroll without submitting another appeal, meaning they can continue to receive aid upon their initial term of reenrollment so long as they are meeting the conditions of their appeal and established academic plan, if applicable.

Similarly, Sierra College permits students to appeal upon reenrollment and actively encourages them to submit an appeal for their anticipated term of reenrollment as soon as they have completed the FAFSA, which may be months in advance of their return.

9

Do not impose appeal deadlines or other additional requirements beyond those required by federal law.

While there are undoubtedly many elements of SAP policies that are required by federal law and are therefore out of the control of individual institutions, JBAY's analysis of policies found that many public institutions went beyond federal requirements by imposing additional standards not required by law. Examples include evaluating SAP based on both cumulative and individual term measures; imposing limits on the number of times a student may request an appeal or creating appeal deadlines; disallowing the use of financial aid for repeated courses; and creating strict limitations on appeal circumstances. Such policies are in place at many California institutions and create additional barriers to maintaining or regaining access to financial aid despite none of these policies being required by federal law.

Spotlight: Sierra College's Efforts to Create Equity-Based Financial Aid Policies and Processes

Sierra College is a public community college with a population of nearly 25,000 students located in Rocklin, California. In recent years, Sierra College has made concerted efforts to create student-centered and equity-based financial aid policies to improve organizational efficiency and better address student disparities. As part of these efforts, Sierra College implemented an ongoing business process analysis (BPA) to identify students' touchpoints with the financial aid office, such as completing verification requests and submitting documentation, and areas where inequities may exist due to both policies and procedures. Through this process, they discovered ways to reorganize workload and leverage technology to increase their capacity to provide one-on-one support and attention to students' needs.

In order to better address the needs of marginalized students, Sierra College utilized Student Equity and Achievement (SEA) Program funding to hire two new financial aid technicians to work with historically underrepresented and underserved student populations, including participants in the college's first-generation and foster youth programs. They also hired additional Information and Instructional Technology (IIT) staff members to modernize their technology infrastructure and automate certain processes, freeing up staffing resources to provide more

student-centered support.

Improvements included adding an online chatbot to their financial aid webpage to address student questions in real time and implementing new software to streamline the verification process by allowing students to view verification requirements and more easily upload supporting documentation. They also recognized that students' financial aid appeals could only be completed by a small number of specialists and were taking a significant amount of time to process, so they began cross-training

and permitting all financial aid staff to review and process appeal petitions. These staffing and technology enhancements reduced processing times and allowed eligible students, including those with pending appeals, to receive financial aid earlier in the semester.

In addition to increasing staffing levels, Sierra College began questioning and challenging existing policies and procedures to determine if they were the most accurate, efficient, and equitable approaches while remaining in compliance with existing regulations and requirements. One of the most significant changes they recently made was an overhaul of a longstanding policy that saw students' financial aid terminated after one semester of withdrawing or failing all courses regardless of their cumulative GPA or unit completion percentage. Review of this policy revealed that it was much more stringent than required by federal SAP regulations, and they modified the policy to better reflect the minimum standards.



Policy Recommendations

In addition to policy changes at the institutional level, broader policy changes can also address the inequities inherent in existing SAP requirements. Changes at the federal level would have the most significant impact, however, state level changes can be leveraged to create equity-focused policies as well.

FEDERAL POLICY RECOMMENDATIONS

1

Update SAP standards to better reflect student realities.

The inequitable consequences of SAP standards will never be fully ameliorated until the policies themselves are modified to reflect the reality of the current day student experience. While it is reasonable for the federal government to seek to ensure that federal funds are being used for their intended purpose, modifications to SAP standards could stay true to this goal, while simultaneously not further disadvantaging students who may face additional barriers as they work towards achieving their educational goals.

- a. **Expand the period during which a student can retain financial aid while not making SAP.** For many students who are new to college, do not receive proper advising, arrive with academic deficiencies, or who are balancing a multitude of life obligations, additional time is necessary before a judgment is made that the student is either “undeserving” of aid or unable to be successful. A time period of two terms is simply inadequate to make an assessment that could potentially disqualify a student from ever again having an opportunity to pursue postsecondary education. An expansion of the time frame could be accompanied by requirements that students complete a plan to improve academic progress as a condition of continued access to financial aid. This should also be accompanied by safeguards to ensure that for-profit proprietary institutions cannot take advantage of such an expansion.
- b. **Require all institutions to offer an appeals process and broaden the basis for appeals.** Current federal regulations do not require campuses to offer an appeals process and limit eligibility to appeal the loss of financial aid to “the death of a relative, an injury or illness of the student, or other special circumstances.” While “other special circumstances” is not further defined at the federal level, most campuses limit the basis for an appeal to circumstances that are severe, unforeseen, and beyond the student’s control. Some campus policies explicitly state that factors such as work conflicts, too heavy a course load, lack of childcare, transportation challenges, or not obtaining the necessary books or course materials are not grounds for an appeal.

The existing criteria do not take into account the reality of today’s students’ lives, nor do they account for the specific challenges that low-income students are more likely to face that may impede their ability to meet SAP standards. All institutions should be required to offer an appeals process and the criteria for appeal should be broadened to allow students from all walks of life a chance at success in a way that also recognizes that some students may require more support or may take longer than others to find their academic footing.

- c. **Allow for reinstatement of financial aid after a period of disenrollment without preconditions.** When a student is disqualified from financial aid because of failure to make SAP, this disqualification typically follows them for the rest of their life and poses a significant barrier to their subsequent return to college. A student who experiences challenges early in their academic career may leave school but ultimately return later in life when they are in a better position to be successful. These students, however, are typically barred from receiving financial aid until they have successfully completed a minimum number of terms or courses with an acceptable GPA to regain SAP. These

Policy Recommendations (continued)

students experience a catch-22: They can't receive financial aid until they succeed in courses, but they cannot succeed in courses without access to financial aid. Allowing students to regain eligibility after a period of disenrollment without needing to first demonstrate academic progress will ensure that mistakes made during a student's early attempts at college do not permanently disqualify them from future academic opportunities.

d. Modify maximum time frame standards.

While completion of an academic program within 150 percent of the published time frame is a laudable goal, extenuating circumstances can prevent completion within this time frame, and more flexibility is needed. Students who enter college with significant gaps in their academic skill set, who do not receive proper advising or who encounter challenges along the way that result in disenrollment from courses may need additional time to finish their program. It is particularly tragic when a student does eventually find their way to academic success, only to be cut off of financial aid just before they reach the finish line. Maximum time frame standards should be modified to allow for greater flexibility when needed to allow a student to complete their program.

2

Extend the SAP flexibilities granted to institutions as a result of the COVID-19 pandemic.

The CARES Act granted postsecondary institutions increased flexibility in calculating SAP during the pandemic. This flexibility, which is set to end upon expiration of the COVID-19 public health emergency declaration, should be extended post-pandemic to mitigate the learning loss resulting from school closures since the impacts are likely to reverberate for years to come. Incoming freshman are at greatest risk for not making SAP given that many of these students did not receive adequate learning opportunities during their senior year of high school. Extending the flexibilities through at least one year after the end of the public health emergency will help counteract the impact of learning loss.



Policy Recommendations (continued)

3

Identify funding that institutions can use to create intrusive coaching programs targeting students at-risk of losing financial aid.

In order to implement the recommendation noted above regarding providing intrusive coaching, additional funding will likely be needed. Models for student success programs that have been proven to positively impact student outcomes exist and these could be replicated with a focus on students at risk of losing financial aid.²⁸

4

Require institutions to proactively communicate with students about their SAP status.

Students often find out that they are at risk of losing financial aid only when it is too late to remedy the situation. Institutions should be required to both clearly communicate with students up front regarding their SAP policies and implement early warning systems that ensure that students have adequate time to seek additional support before the loss of financial aid.

5

Require institutions to report on SAP disqualifications, including differences across student subgroups and the impact on student retention.

The impact that SAP policies have on student retention and success has gone largely unrecognized and the availability of data on this issue is scarce. Mandatory reporting on the prevalence and impact of SAP failure would help both individual institutions and the Department of Education better understand how SAP policies impact students and whether additional changes to policies are indicated.

The changes recommended above are those specific to the issue of SAP. The issue of student success is multi-faceted and will require a range of interventions. Current efforts to double the Pell Grant amount and a proposal by The Institute for College Access and Success (TICAS) to expand the availability of upfront support services are examples of other policy efforts that should go hand in hand with SAP reform.²⁹

STATE POLICY RECOMMENDATIONS

1

Modify SAP standards for local financial aid programs that are not subject to federal standards.

Where states have discretion to set the rules for local financial aid programs, alternatives to federal SAP standards should be utilized. For example, the California Community College Promise Grant relies on a modified version of academic progress standards that provide for both additional time and more flexibility. Financial aid offices have developed systems that allow for tracking California Community College Promise Grant eligibility separately from federal financial aid. Any program operated by a state that is not subject to federal Title IV rules should examine existing policies to determine where additional flexibility could be offered.

California's Cal Grant program is also primarily state-funded and therefore the state has more discretion to set the rules for this program. As noted above, the California Community College Promise Grant relies on a modified version of academic progress standards that provide for both additional time and more flexibility. Cal Grant standards could be aligned to these criteria rather than federal SAP requirements.

In addition, the Cal Grant program is currently limited to four years, (or five years for a teaching credential program). This time frame should be extended to, at a minimum, align with the federal standard of six years to give students ample time to complete their program.

Policy Recommendations (continued)

2

States should take advantage of the flexibility that currently exists in federal law for the Chafee Education and Training Voucher program to offer more flexible SAP standards.

The Chafee ETV program is authorized through the John H. Chafee Foster Care Independence Program and is not subject to Title IV requirements. Existing statutory language specifies that states must ensure that students are making satisfactory progress toward completion of a postsecondary education or training program, however states have discretion when defining satisfactory progress. California's law enacted through Senate Bill 150 in 2019 can serve as a model for other states in this regard. The bill allows students to continue to receive funding for an additional two terms beyond Pell Grant eligibility provided that the student meets with an appropriate college staff member to develop a plan for improving academic progress and performance. The bill also allows for the reinstatement of the Chafee ETV grant following a period of disenrollment without requiring the student to first meet prescribed academic standards.

3

States should ensure that financial aid offices and support services are adequately funded and predicate funding on the adoption of specific student-friendly policies and processes.

In many states, including California, college financial aid offices have been chronically underfunded for many years, particularly at the community college level. The resulting lack of sufficient staffing has produced both long wait times for students seeking assistance with financial aid issues and an inability on the part of these offices to offer the full range of student-centered support that is necessary to increase access to financial aid.

Financial aid offices are also balancing the need to comply with federal and state requirements and function as responsible stewards of public funds with the goal of increasing access to postsecondary education for low-income students. Where each campus falls on this continuum, however, is often rooted in the philosophical perspective held by the financial aid director or other campus administrators rather than a reflection of student needs. This has resulted in inequities across the systems, with some students having greater access to financial aid than others facing similar circumstances.

Both issues could be simultaneously addressed by allocating additional funding to financial aid offices contingent on the adoption of student-friendly policies such as more flexible SAP standards, expanded opportunities for SAP appeal, and staff support for students through the appeals process. Such an effort could also include requiring the implementation of other financial aid policies not related to SAP such as prioritizing financial aid packaging for the highest need students, limiting requests for additional documentation or application verification only to situations in which such documentation is required by federal law, and disbursing financial aid prior to the start of the term. The Community College League of California issued a publication in February 2020 that outlined Student Focused Financial Aid Policies that could be used as a guide to such an effort.

Additional funding would also be necessary to implement the type of intrusive coaching discussed previously in this report. Funding could be allocated to student support programs specifically for this purpose.



State Policies That Support Equity

While much of SAP-related policies are governed by federal law, states have discretion regarding local financial aid program policies and can use this as leverage to support student-friendly institutional SAP policies. In California, three examples of how the state has begun to adopt policies to reduce the negative impact of SAP requirements are illustrative of locally based approaches.

CALIFORNIA COLLEGE PROMISE GRANT

California offers low-income California residents tuition waivers for all 115 colleges that charge tuition.^d This waiver, known as the California College Promise Grant, requires students to meet academic progress standards that offer additional flexibility beyond the federal SAP standards. The standards require a cumulative 2.0 GPA and satisfactory completion of more than 50 percent of attempted units, rather than the 67 percent completion rate required by most institutional or campus SAP policies.

Appeals can be granted based on the presence of circumstances beyond the student's control, changes to the student's economic situation, evidence the student was unable to obtain essential support services, or by showing significant academic improvement. Special considerations are made for Veteran students and students enrolled in an institution's support program for students with disabilities, CalWORKs program (for students enrolled in Temporary Assistance to Needy Families (TANF)), or Extended Opportunity Programs and Services (EOPS), a program for educationally disadvantaged students attending full-time. Students can also regain eligibility by meeting the academic and progress standards or by sitting out two consecutive academic terms. In recognition of the special challenges that foster youth face, state regulations provide additional protections for foster youth, allowing them an exemption from the loss of the tuition waiver.

In addition, the loss of the Promise Grant takes effect at the next registration date after the determination of academic status. In most cases, since registration for the following term occurs before the end of the current term, students can retain the fee waiver for three consecutive primary terms, as well as possibly a summer term, before losing aid.

^d The Calbright online campus does not charge tuition to any student.

State Policies That Support Equity

CHAFEE EDUCATION AND TRAINING VOUCHER

In 2019, the State of California adopted Senate Bill 150, which made changes to the academic progress standards for the Chafee Education and Training Voucher (ETV) program, a federal program that provides up to \$5,000 per year for up to five years to current and former foster youth enrolled in a qualifying postsecondary program. The bill created unique SAP requirements for Chafee ETV grants with more flexible standards. These funds are not authorized under Title IV of the Higher Education Act but rather under the John H. Chafee Foster Care Independence Program and, therefore, states have greater flexibility when defining academic progress standards. The bill allows students to continue to receive funding for up to two years while not making SAP if the student has developed a plan for improving academic progress; it also expands the criteria for appealing the loss of the award.

HOMELESSNESS AS AN EXTENUATING CIRCUMSTANCE

In 2020, the State of California adopted Assembly Bill 2416, which requires postsecondary education institutions participating in state-funded student aid programs, such as the Cal Grant program, to consider homelessness, as defined by the McKinney-Vento Homeless Assistance Act, as an extenuating circumstance when making SAP appeal determinations.

The chart below summarizes the minimum federal SAP requirements and areas of discretion afforded to postsecondary institutions. The chart also contains examples of policies and practices that campuses should avoid so as not to impose additional requirements that extend beyond those required by federal regulation and statute. The final column in the chart highlights equity-based policies and practices, including examples currently in place at public postsecondary institutions in California.

SAP EVALUATION	FEDERAL REQUIREMENTS	AREAS WHERE INSTITUTIONS HAVE DISCRETION	WHAT TO AVOID	WHAT TO INCLUDE
	<p>PROGRAMS >1 ACADEMIC YEAR</p> <p>Institutions must evaluate SAP at least annually based on the cumulative qualitative and quantitative measures.</p> <p>PROGRAMS ≤1 ACADEMIC YEAR</p> <p>Institutions must evaluate SAP at the end of each payment period based on the cumulative qualitative and quantitative measures.</p> <p>Students can fail to meet SAP for only one academic year or two consecutive terms before being disqualified.</p>	<p>Programs greater than one year may evaluate SAP either at the end of each payment period or annually.</p>	<p>If on a semester system, evaluating only yearly, which does not allow for a warning period before a student becomes disqualified from receiving aid.</p> <p>If on a quarter system, evaluating SAP at the end of each term, which would require aid to be discontinued after two consecutive quarters rather than the full academic year.</p> <p>If on a quarter system, evaluating SAP annually, but not implementing an early alert system so that students are informed if they are at risk of disqualification</p>	<ol style="list-style-type: none"> 1. If on a semester system, evaluate SAP at the end of each academic term to provide an opportunity to intervene when there are early warning signs that a student may be at risk of losing financial aid 2. If on a quarter system, evaluate SAP annually to ensure students remain eligible for aid for the full academic year. Simultaneously implement an early alert system to ensure that students are informed that they are at risk of losing financial aid after any quarter in which they do not make SAP.

GPA	FEDERAL REQUIREMENTS	AREAS WHERE INSTITUTIONS HAVE DISCRETION	WHAT TO AVOID	WHAT TO INCLUDE
	<p>PROGRAMS >2 ACADEMIC YEARS Students must have at least a cumulative 2.0 GPA or be in academic standing consistent with the institution's requirements for graduation at the end of their second academic year.</p> <p>PROGRAMS ≤2 ACADEMIC YEARS Students must have a cumulative GPA consistent with the institution's requirements for graduation.</p>	<p>Institutions may implement a fixed or escalating GPA standard. A fixed GPA standard is consistent throughout the duration of the academic program whereas an escalating GPA requirement permits students to have a lower GPA earlier in the program so long as they reach the required GPA by graduation.</p>	<p>Including both a cumulative GPA and term GPA requirement (e.g., a cumulative 2.0 <u>and</u> a 2.0 in each quarter or semester).</p> <p>Setting a GPA requirement that is stricter than the federal minimum.</p>	<p>1. Implementing an escalating GPA</p> <p>EXAMPLES: Cal State Fullerton, CSU Dominguez Hills and CSU San Bernardino evaluate SAP using an escalating minimum cumulative GPA structure based on the number of units completed.</p> <ul style="list-style-type: none"> • 0–29 units: 1.5 GPA • 30–59 units: 1.8 GPA • 60+ units: 2.0 GPA <p>College of the Desert, Evergreen Valley College, and Imperial Valley College evaluate GPA using an escalating minimum cumulative GPA structure based on attempted units or evaluate GPA only after a student has attempted 12 units.</p> <p>2. When courses are repeated, only include the higher grade in the GPA calculation.</p> <p>EXAMPLES: Imperial Valley College counts only the highest grade towards GPA.</p>

UNIT COMPLETION	FEDERAL REQUIREMENTS	AREAS WHERE INSTITUTIONS HAVE DISCRETION	WHAT TO AVOID	WHAT TO INCLUDE
	Institutions must select a standard that allows students to complete their program within the maximum time frame allotted (i.e., 150% of the minimum required units).	Institutions may implement a fixed or escalating course completion requirement. If fixed, the course completion percentage would be set at 67 percent throughout the duration of the academic program to ensure students do not exceed the federal maximum timeframe standard of 150 percent. An escalating course completion standard permits student to have a lower completion rate earlier in the academic program so long as they do not exceed the maximum time frame prior to graduation.	<p>Including both a cumulative course completion percentage and a term course completion percentage requirement (e.g., a 67% cumulative completion rate and a 67% completion rate in each quarter or semester).</p> <p>Setting a course completion standard above the rate required by federal regulations.</p>	<p>Implementing an escalating graduation percentage based on completed units.</p> <p>EXAMPLES: UC San Diego evaluates unit completion using an escalating course completion percentage based on attempted units.</p> <ul style="list-style-type: none"> • 0–44 units: 30% • 45–89 units: 50% • 90+ units: 66% <p>Butte College requires a 50% cumulative course completion rate for students with fewer than 18 attempted units and a 66.66% completion rate for all others.</p>

FEDERAL REQUIREMENTS	AREAS WHERE INSTITUTIONS HAVE DISCRETION	WHAT TO AVOID	WHAT TO INCLUDE
Institutions must calculate 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.	<p>Institutions may include but aren't required to include remedial courses when making the assessment of the quantitative component of SAP.</p> <p>Policies may permit that for students who change academic majors, credits and grades that do not count toward the new academic major will not be included in the satisfactory progress determination.</p>	Including courses not required in federal regulations, such as remedial and non-major courses (for students who've changed majors), in maximum time frame calculations and/or requiring students to petition to have remedial courses removed from the maximum time frame calculations.	<ol style="list-style-type: none"> 1. Exclude remedial coursework from the maximum time frame calculations EXAMPLES: LA Mission College and LA Pierce College exclude remedial coursework or ESL courses from the Maximum Time Frame calculation. 2. Allow students who change majors the option of excluding course work that does not count towards the new major from the SAP determination. EXAMPLES: San Francisco State University allows students to appeal the maximum time frame criteria based on a change of major. 3. When courses are repeated, only include the higher grade in the GPA calculation EXAMPLES: Imperial Valley College only counts the higher grade. Cal Poly San Luis Obispo allows undergraduate students to repeat a maximum of 16 units for purposes of improving their GPA. If the repeat grade is higher than the first, it replaces the first grade in the GPA computation. 4. Exclude grades earned at a prior institution and not transferred to a new institution from the GPA calculation and from maximum time frame. EXAMPLES: Copper Mountain College excludes transfer grades from the GPA calculation. Cal Poly Pomona excludes any units from a 2-year institution that are in excess of 70 units from the Maximum Time Frame and students with additional transfer credit may request to have credits excluded if they cannot be used to meet a degree requirement.

APPEALS	FEDERAL REQUIREMENTS	AREAS WHERE INSTITUTIONS HAVE DISCRETION	WHAT TO AVOID	WHAT TO INCLUDE
	<p>Campuses are not required to have an appeals process. Those that choose to offer appeals must include the following:</p> <ol style="list-style-type: none"> 1. how a student can request an appeal, 2. the basis on which a student may file an appeal, and 3. what information a student must submit regarding why they failed to make SAP and what has changed that will enable them to make SAP by the next evaluation. 	<p>Institutions determine the process and documentation required for an appeal. They are permitted to require more or less documentation for initial and subsequent appeals (e.g., more extensive documentation for an initial appeal and a shorter update or statement for a subsequent appeal).</p>	<ul style="list-style-type: none"> • Establishing a limit on the number of lifetime appeals a student can file. • Requiring documentation that exceeds what is necessary to substantiate students' circumstances. • Determining that all decisions related to appeals are final with no further recourse for students whose appeals are denied. • Dropping students for nonpayment while they have a pending appeal. • Requiring students to take quizzes on the institution's SAP standards before being given access to appeals forms. • Including lists of criteria that do not constitute valid reasons for appeals. 	<ol style="list-style-type: none"> 1. Making staff available to assist students with producing the required documentation. 2. Having written policies that are student-friendly and encourage rather than discourage the use of the appeals process. 3. Allowing appeals to be submitted electronically, by mail, or in person; ensuring an evaluation of appeals within 30 days of receipt; and providing for a review of a negative decision. 4. Developing processes with student business services to ensure students with a pending appeal are not disenrolled for nonpayment of tuition or fees. <p>EXAMPLES:</p> <p>Los Angeles City College allows students to submit a second-level petition if the initial appeal request is denied.</p> <p>CSU Long Beach evaluates appeals within three weeks and allows students to challenge an appeal denial.</p> <p>Copper Mountain College provides appeals decisions within seven business days.</p>

EXTENUATING CIRCUMSTANCES	FEDERAL REQUIREMENTS	AREAS WHERE INSTITUTIONS HAVE DISCRETION	WHAT TO AVOID	WHAT TO INCLUDE
	If a campus offers an appeals process, the policy must describe the basis on which a student may file an appeal and include the “death of a relative, an injury or illness of the student or other special circumstances” as the basis for a successful appeal	Institutions have the ability to define “other special circumstances.”	<ul style="list-style-type: none"> Limiting special circumstances to a specified list of circumstances. Explicitly prohibiting factors such as incarceration, transportation challenges, financial challenges, lack of childcare, academic overload, or employment demands. 	<p>Including a broad range of special circumstances that take into account a range of potential challenges or circumstances.</p> <p>EXAMPLES: Feather River College permits appeals on the basis of illness or injury, family problems, inability to access support services, and/or change in financial status. They also make special consideration for CalWORKs, EOPS, DSPS, and veteran students.</p> <p>CSU Channel Islands specifically allows circumstances related to financial difficulties, family difficulties, interpersonal problems, and difficulties balancing school/work/family responsibilities.</p>
REENROLLMENT	FEDERAL REQUIREMENTS	AREAS WHERE INSTITUTIONS HAVE DISCRETION	WHAT TO AVOID	WHAT TO INCLUDE
	Students are subject to the appeals process outlined by the institution.	Institutions have discretion in determining when a reenrolling student may submit an appeal and become eligible to have financial aid reinstated.	<p>Requiring students to fully meet SAP criteria before financial aid is reinstated.</p> <p>Requiring students to attend for one or more academic terms before being allowed to submit an appeal.</p>	<p>Provide opportunities for students to obtain financial aid during the first term of reenrollment based on either a new appeal or the terms of a previous successful appeal.</p> <p>EXAMPLES: Riverside Community College permits appeals immediately upon reenrollment and honors prior appeals, meaning students on financial aid probation can disenroll and reenroll without losing aid so long as they meet the conditions of their appeal.</p> <p>Sierra College accepts appeals upon reenrollment and encourages students to submit an appeal for their anticipated term of reenrollment as soon as they complete the FAFSA.</p>

The following tool can help institutions determine if their current SAP policies introduce additional barriers to receiving financial aid beyond the required minimum federal standards. Campuses can use this tool to evaluate whether existing policies and practices are student-centered and equity-based, and where changes can be made.

If your institution answers “no” to any of the questions below, consider modifying SAP policies.



1. SAP EVALUATION

- If on a semester schedule, does your campus evaluate SAP at the end of each term?
- If on a quarter system, does your campus evaluate SAP annually?
 - **If yes**, does your campus have an alert system to ensure that students are informed that they are at risk of losing financial aid after any quarter in which they do not make SAP?
- Does your institution have an “early alert” system in place to proactively identify and engage students at risk of not meeting SAP?

POTENTIAL CHANGES

2. GPA REQUIREMENT

- Is SAP determined based only on a cumulative GPA evaluation and not also on a single term evaluation?
- Is the GPA requirement set at the federally mandated minimum?
- Does your institution have an escalating GPA requirement based on the number of units completed?

POTENTIAL CHANGES

3. UNIT COMPLETION REQUIREMENT

- Is SAP determined based only on a cumulative evaluation and not also on a single term evaluation?
- Is the required completion percentage set at the federally mandated minimum?
- Does your institution have an escalating unit completion requirement based on the number of units completed?

POTENTIAL CHANGES

4. COURSE INCLUSION

- Does your institution exclude remedial coursework from maximum time frame requirements?
- For students who have changed academic majors, does your institution exclude units that do not count towards the student's selected major from the maximum time frame requirements?
- When courses are repeated, does your institution only include the higher grade in the GPA calculation?
- Does your institution exclude units transferred from another institution from the GPA and maximum time frame calculations?

POTENTIAL CHANGES

5. STUDENT SUPPORT

- Does your institution provide intrusive coaching to students at risk of financial aid disqualification?

POTENTIAL CHANGES

6. APPEALS

- Does your institution offer an appeals process?
- Is your policy written in student-friendly language that encourages rather than discourages the use of the appeals process?
- Are appeals forms and policies readily available to students in paper and electronic formats?
- Does your policy avoid imposing additional barriers such as requiring students to pass a test before they can submit an appeal?
- Do students receive one-on-one support to complete the appeals form and submit the required documentation?
- Are students with pending appeals protected from being dropped from their classes for nonpayment?
- Are students notified of the outcome of the appeal within 30 days of filing?
- Does your institution have an additional layer of review or recourse for appeals that are denied?
- Does your institution allow students to file multiple appeals?

POTENTIAL CHANGES

7. EXTENUATING CIRCUMSTANCES

- Does your institution accept appeals based on a broad range of special or extenuating circumstances?
- Does your SAP policy avoid explicitly prohibiting appeals for certain circumstances such as transportation challenges, financial challenges, lack of childcare, academic overload, or employment demands?

POTENTIAL CHANGES

8. REENROLLMENT

- Does your institution allow students who are reenrolling to appeal a SAP disqualification for the first term of reenrollment?
- Does your institution allow students on financial aid probation to disenroll and reenroll without losing aid so long as they meet the conditions of their appeal and academic plan?

POTENTIAL CHANGES



REFERENCES

1. Carnevale, A.P., Jayasundera, T., & Gulish, A. (2016). *America's divided recovery: College have and have-nots*. Georgetown University Center on Education and the Workforce.
2. U.S. Bureau of Labor Statistics. (2019, May). Learn more, earn more: Education leads to higher wages, lower unemployment. *Career Outlook*. Retrieved from <https://www.bls.gov/careeroutlook/2020/data-on-display/education-pays.htm>
3. Fowers, A. (2021, January 27). The economy is getting even worse for Americans with a high school diploma or less education. *Washington Post*.
4. Ocean, M. (2021). Academically eligible and ineligible Pell Grant community college students: A qualitative investigation. *Community College Review*, 49(2), 156–176.
5. Program Integrity Issues, 75 Fed. Reg. 34805 (June 18, 2010) (to be codified at 34 C.F.R. pts. 600, 602, 603, 668, 682, 685, 686, 690, & 691).
6. Satisfactory Academic Progress, 34 C.F.R. § 668.34 (2010).
7. Gibbs, T., Powell, L., Barree, Z., Selby, S. & Sullivan, A. (2020, April 22). *Satisfactory academic progress: Basics & beyond* [Webinar]. National Association of Student Financial Aid Administrators. Retrieved from https://www.nasfaa.org/uploads/documents/SAP_Basics_Beyond_Webinar_Handout.pdf
8. United States Department of Education. (2010, March 5). *Guidance for interruptions of study related to Coronavirus (COVID-19) (Update June 16, 2020)* [Electronic announcement].
9. Coronavirus Aid, Relief, and Economic Security Act, H.R. 748, § 3509, 116th Cong. (2020).
10. United States Department of Education. (2020, May 15). *UPDATED Guidance for interruptions of study related to Coronavirus (COVID-19) (Updated June 16, 2020)* [Electronic announcement].
11. Flaherty, C. (2020, November 30). Pass-fail hardball. *Inside Higher Ed*.
12. National Association of Student Financial Aid Administrators. (2021, May 13). *Can a student on SAP suspension receive HEERF I, HEERF II, AND HEERF III?* [Electronic question and answer]. Retrieved from <https://askregs.nasfaa.org/article/34768/can-a-student-on-sap-suspension-receive-heerf-i-heerf-ii-and-heerf-iii>
13. Schudde, L. & Scott-Clayton, J. (2014, December 8). *Pell Grants as performance-based aid? An examination of satisfactory academic progress requirements in the nation's largest need-based aid program*. Community College Research Center.
14. Schudde & Scott-Clayton, 2014.
15. Schudde & Scott-Clayton, 2014.
16. Radwin, D., Conzelmann, J.G., Nunnery, A., Lacy, T.A., Wu, J., Lew, S., Wine, J., and Siegel, P. (2018). *2015–16 National Postsecondary Student Aid Study (NPSAS:16): Student Financial Aid Estimates for 2015–16* (NCES 2018–466). U.S. Department of Education. Washington, DC: National Center for Education Statistics.
17. Ocean, 2021.
18. Ocean, 2021.
19. United States Department of Education. (2019). *2019–2020 Federal Student Aid Handbook*, 1–13, 1–16.
20. United States Department of Education. (2019). *2019–2020 Federal Student Aid Handbook*, 1–13, 1–14, 1–16.
21. United States Department of Education. (2019). *2019–2020 Federal Student Aid Handbook*, 1–13.
22. United States Department of Education. (2019). *2019–2020 Federal Student Aid Handbook*, 1–14.
23. National Association of Student Financial Aid Administrators. (2012, August). *Satisfactory Academic Progress. NASFAA Monograph*, 25, 1–26.
24. National Association of Student Financial Aid Administrators. (2012, August). *Satisfactory Academic Progress. NASFAA Monograph*, 25, 1–26.
25. Finnie, R., Fricker, T., Bozkurt, E., Poirier, W., Pavlic, D., & Pratt, M. (2017). *Academic advising: Measuring the effects of “proactive” interventions on student outcomes*. Toronto: Higher Education Quality Council of Ontario. & <http://ccrc.tc.columbia.edu/media/k2/attachments/designing-a-system-for-strategic-advising.pdf>
26. Donaldson, P., McKinney, L., Lee, M. & Pino, D. (2016). First-year community college students' perceptions of and attitudes toward intrusive academic advising. *NACADA Journal*, 36 (1), 30–42.
27. United States Department of Education. (2019). *2019–2020 Federal Student Aid Handbook*, 1–17.
28. The Institute for College Access and Success, *Raising College Attainment: A National Proposal to Scale Student Success Strategies*, 2021 (available at <https://ticas.org/wp-content/uploads/2021/04/Raising-College-Attainment-A-National-Proposal-to-Scale-Student-Success-Strategies.pdf>).
29. The Institute for College Access and Success, 2021.



About John Burton Advocates for Youth

John Burton Advocates for Youth improves the quality of life for youth in California who have been in foster care or homeless by **advocating for better laws, training communities** to strengthen local practices and **conducting research** to inform policy solutions.

