

Satisfactory Academic Progress and Resolving UEH C-Code Flags



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SAP Policy Resources

- FSA HB Volume 1, Chapter 1
- OPE has published a list of Program Integrity Q&As, including SAP, on its own website
 - <http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/integrity-qa.html>
- List of Q&As is updated occasionally

SAP Policy Requirements

- Must specify that if a student is not meeting the standards, he or she is not eligible to receive federal student aid
- When SAP is evaluated.
- Warning and probation statuses must be described if included in school's policy
- Students must be notified of determinations that impact their Title IV aid

SAP Policy Requirements

SAP policy required elements include

- Measurement of student's progress at each evaluation
- GPA that a student must achieve at each evaluation (qualitative standard)
- Pace of completion to ensure completion within the maximum time frame (quantitative standard)

SAP Policy – Other Key Items

- Policy must include the following -
- Describe how student's GPA and pace of completion affected by:
 - *Incompletes*
 - *Withdrawals*
 - *Repetitions*
 - *Transfers of credits*
- Transfer credits accepted toward completion of student's program must count as both hours attempted and hours completed



How Often is SAP Evaluated?

- Frequency of evaluation determines options
- School must evaluate SAP at end of each payment period for programs of study that are *one academic year or less in length*
- For programs of study *longer than one academic year*
 - **School must evaluate at least annually to correspond with end of a payment period**
- School may evaluate at end of each payment period



SAP Evaluations

- Each official evaluation must include evaluation of the qualitative (grade-based), quantitative (time-related), and maximum timeframe standards
- Financial aid warning and probation statuses only last for one payment period, no matter how frequently SAP is evaluated
- “Financial aid warning” and “Financial aid probation” must have the same definitions as described in regulation



Qualitative Measure

Definition: To access quality of academic work using standards measureable against a norm

- Grades; work projects; etc.
- Must be cumulative
- May use a graduated or fixed standard



Quantitative Measure

Definition: To measure progress toward program completion

- Must be cumulative
- May use a graduated or fixed standard
- Pace of progression required to make sure student completes within maximum timeframe



Quantitative Measure

- School may use standard rounding rules when calculating percentages under the quantitative measurement
 - Clock-hour or credit-hour programs
 - Example – 66.5% could be rounded up to 67%
- Rounding is optional within SAP policy
- Program integrity Q & A website under the SAP topic, question R-Q9 (clock-hour example)

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Maximum Timeframe

- For undergraduate programs, must be no longer than 150% of published length of educational program
 - For graduate programs, school defines the maximum based upon length of program
- Example:
- Degree program requires 120 credits for completion
 - $120 \times 150\% = 180$ attempted credits is maximum timeframe
- Quantitative measure (tied to max timeframe)
 - $120 \text{ credits} / 180 \text{ credits} = 66.6\%$ (usually rounded to 67%)
 - *Student must earn 67% of credit-hours attempted*

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Maximum Timeframe

- Must be measured at each evaluation point
- Student is ineligible at the evaluation point when pace mathematically exceeds max timeframe NOT at the point when the max timeframe is reached
- Example
 - At end of payment period (SAP evaluation checkpoint) student has attempted 160 credit-hours out of a possible 180 credit-hours allowed under max timeframe but has 25 hours left to earn to complete his degree
 - The student is not meeting SAP due to exceeding the max timeframe because he has more hours to earn than what is allowed to graduate within the maximum timeframe

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Change of Major

- Schools may set their own SAP policy dealing with changes of major as related to maximum time frame
- SAP policy may limit the number of times that a student may change majors and have the maximum time frame recalculated

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Schools Have Options

School may choose to implement one, several, all, or none of these options

- Warning
- Appeal
- Probation
- Academic Plan

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Financial Aid Warning

- School must evaluate SAP at the end of each and every payment period to use this status
- School may establish when it is used in policy
- Status assigned to a student who fails to make SAP
- Student may continue to receive federal student aid for **one** payment period
- No appeal necessary for this status
- Student is not making SAP while in this status

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Appeal

- School may allow one appeal or multiple appeals or NO appeals
- May choose to limit the number of appeals
- School may craft academic plan as it sees fit for the individual student

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Financial Aid Probation

- Status assigned by an institution to a student who fails to make SAP and who has successfully *appealed* to have eligibility for federal student aid reinstated
- Institution may impose conditions for student's continued eligibility to receive federal student aid
- Student may receive aid in this status for **one** payment period
- Student is not making SAP while in this status

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Financial Aid Probation

- Probation status must be checked each payment period even if non-probationary students are checked less frequently
- If it appears that student can return to SAP status after one payment period, school may choose not to implement an academic plan

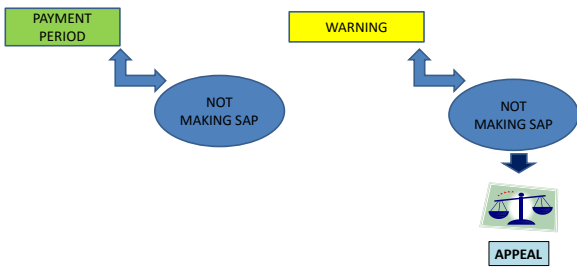
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If School Implements All Options

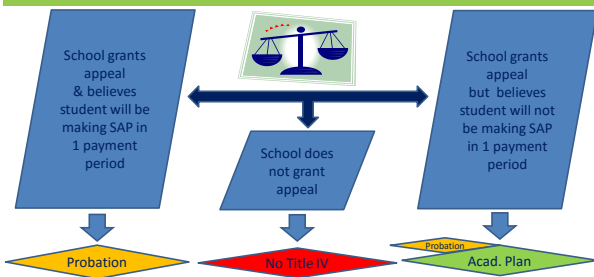
- School exercises its option to evaluate SAP at the end of every payment period
- School chooses to have a warning status
- School chooses to have an appeal process
- School chooses to have a probationary status
- School chooses to use an academic plan



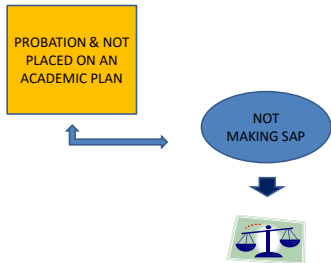
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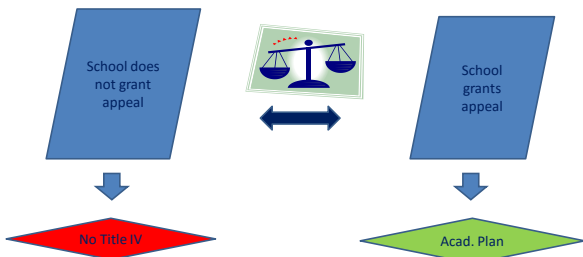
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Implementation Questions

- Will you have fixed or graduated standards?
- Will you have different standards for different categories of students?
- How will you treat course incompletes, withdrawals, and repetitions?
- How will you treat transfer credits?
- How will you treat remedial courses?
- Will your policy permit appeals, and if so, how many?
- Who will review appeals?
- If you have academic plans, who will develop, approve, and monitor compliance with academic plans?

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QUESTIONS?



Unusual Enrollment History



UEH – Resources

- Dear Colleague Letter GEN-13-09, Published March 8, 2013, 2013-14 Award Year: Students with an Unusual Enrollment History Flag – ‘C’ Code on the ISIR
- Dear Colleague Letter GEN-15-05, Published March 16, 2015, 2015-16 Unusual Enrollment History Flag
- *FSA Handbook*, Volume 1 Chapter 3



Unusual Enrollment History (UEH)

Beginning with the 2013-14 award year, ED added an Unusual Enrollment History (UEH) flag to the ISIR that indicates that a student has an unusual enrollment history based on the receipt of Federal Pell Grant (Pell Grant) funds. If 2015-16, Direct Loan borrowers were added to the review process

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Unusual Enrollment History (UEH)

- We are concerned about an enrollment pattern in which a student attends an institution:
 - long enough to receive Title IV credit balance funds,
 - leaves without completing the enrollment period,
 - enrolls at another institution, and
 - repeats the pattern of remaining just long enough to collect another Title IV credit balance without having earned any academic credit

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UEH – Overview

- Some students who have an unusual enrollment history have legitimate reasons for their enrollment at multiple institutions
- However, such an enrollment history requires a review to determine whether there are valid reasons for the unusual enrollment history
- Resolution of a UEH flag is separate and distinct from verification

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NSLDS UEH Flags

- A UEH Flag value of 'N' indicates that there is no unusual enrollment history issue and, thus, no 'C' Code, no comments, and no action required by the institution
- A UEH Flag with a value of '2' indicates an unusual enrollment history that requires review by the institution of the student's enrollment records
 - An example of an enrollment pattern that generates a UEH Flag value of '2' would be when the student received Pell Grant funds, Pell and Loans, or Loan only at three institutions over two award years

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NSLDS UEH Flags

- A UEH Flag with a value of '3' indicates that the institution must review academic records for the student and, in some instances, must collect additional documentation from the student
- An example of an enrollment pattern that generates a UEH Flag value of '3' would be when the student received Pell Grant funds at three or more institutions in one award year

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NSLDS UEH Flags

| NSLDS Unusual Enrollment History Flag | Description | SAR C Flag? | SAR Comment |
|---------------------------------------|--|-------------|-------------|
| 1 | For Federal Student Aid Use Only | N/A | N/A |
| 2 | Unusual Enrollment History 2 (Possible enrollment pattern problem, school may need to resolve) | Yes | 359 |
| 3 | Unusual Enrollment History 3 (Questionable enrollment pattern, school must resolve) | Yes | 360 |
| N | Enrollment pattern not unusual (No school action required) | No | N/A |
| Blank | Record not sent for match | No | N/A |

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SAR/ISIR C-Code and C Flag

SAR comments and the SAR C Flag will be generated for flags 2 and 3; resolution guidance provided to schools

| Comment No. | SAR Comment | School Action to include |
|-------------|--|---|
| 359 | Your school may request additional information to determine your eligibility for federal student aid. Note: This comment will generate a SAR C flag as already documented. | Action depends on whether the school is a new school for the applicant for 2016-2017. If not a new school, school not required to take any action but may look into the applicant's enrollment history. If new school for applicant, school must take certain actions that will be developed by FSA and OPE policy. |
| 360 | Based upon data provided by the National Student Loan Data System (NSLDS), your school will request additional information to determine your eligibility for federal student aid and before disbursement of funds can be made. Note: This comment will generate a SAR C flag as already documented. | School must take certain enhanced actions that will be developed by FSA and OPE policy. |

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UEH – Resolution

- Resolving Unusual Enrollment History Flags
- UEH Flag value is 'N': No action is necessary as the student's enrollment pattern does not appear to be unusual

- UEH Flag value is '2': The institution must review the student's enrollment and financial aid records to determine if, during the four award year review period (Award Years 2012-13, 2013-14, 2014-15, and 2015-16), the student received a Pell Grant/Direct Loan at the institution that is performing the review for 2016-17.

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UEH – Resolution

- If aid disbursements were found in the UEH Flag 2 review, no additional action is required unless the institution has reason to believe that the student is one who remains enrolled just long enough to collect student aid funds

- If not, the institution must follow the guidance that is provided for a UEH Flag of '3'

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UEH – Resolution

- Resolving Unusual Enrollment History Flags
- **UEH Flag value is '3':** The institution must review the student's academic records to determine if the student received academic credit at the institutions the student attended during the four award year period
- Using information from the National Student Loan Data System (NSLDS), the institution must identify the institutions where the student received Pell Grant/Direct Loan funding over the past four award years (2012-13, 2013-14, 2014-15, and 2015-16) for 2016-17.

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UEH – Resolution

- Resolving Unusual Enrollment History Flags
- Based upon academic transcripts it may already possess, or by asking the student to provide academic transcripts or grade reports, the institution
- Must determine, for each of the previously attended institutions, whether academic credit was earned during the award year in which the student received Pell Grant or loan funds. For 2015-16 review four award years and for 2014-15 and prior review three award years and only Pell Grants
- Academic credit is considered to have been earned if the academic records show that the student completed any credit-hours or clock-hours

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UEH – Resolution

- Academic Credit Earned
- If the institution determines that the student earned any academic credit at each of the previously attended institutions during the relevant award years, no further action is required
- Unless the institution has other reasons to believe that the student is one who enrolls just to receive the credit balance

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UEH – Resolution

- Academic Credit Not Earned
 - If the student did not earn academic credit at a previously attended institution and, if applicable, at the institution performing the review, the institution
 - must obtain documentation from the student explaining why the student failed to earn academic credit
 - The institution must determine whether the documentation supports
 - (1) the reasons given by the student for the student's failure to earn academic credit; **and**
 - (2) that the student did not enroll only to receive credit balance funds

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UEH – School Makes Decision

- Approval of Continued Eligibility
 - You can establish an academic plan (ex. SAP appeal plan) and/or;
 - Counsel student on Pell Grant duration of eligibility provisions (LEU)
- Denial of Continued Eligibility
 - You must deny additional federal student aid if no academic credit was earned at one or more institutions and no documentation or acceptable explanation was provided for each failure
 - Students can appeal the denial **with the institution** (similar process as SAP appeals)

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UEH – Eligibility after Denial

- If aid is denied, you must give the student information on how to regain eligibility
- Successful completion of academic credit is the basis for a student's request for renewal of eligibility
 - This can include meeting the requirements of an academic plan that you establish with the student
- Pell Grant eligibility and campus-based aid begin with the payment period in which the student meets the eligibility requirements (following the period of ineligibility)
- Direct Loan eligibility is retroactive to the beginning of the enrollment period

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UEH – Different Code in Next Year

- Circumstances when a student's 2015-16 ISIR included a UEH Flag of '2' or '3', but the UEH Flag value is 'N' on the student's 2016-17 ISIR
 - If you have previously resolved the 2015-16 UEH issue, there is no need for any further review
 - If you have not satisfactorily resolved the 2015-16 UEH issue, you should, but are not required to, hold disbursement of Title IV aid for 2016-17 until you resolve the earlier UEH issue
 - In doing so, you must review not only the student's academic record for the 2012-13, 2013-14, 2014-15 award years noted in DCL GEN-15-05, but also the more recent 2015-16 award year

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UEH – Institutional Selection

- Circumstances where you suspect that a student for whom the Department did not assign a UEH Flag of '2' or '3' on his ISIR may be applying for and receiving Title IV aid for purposes other than to provide financial support for postsecondary education
 - In such instances, you may choose to hold disbursement of Title IV aid until you review the academic history of the student
 - In doing so, you must document the reasons why you took this action, as well as the specific steps the institution took to resolve the institutional selection for UEH review

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QUESTIONS?

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Help with Title IV Questions

- *For Schools & Other Professionals*
 - Research and Customer Care Center (RCCC)
 - 1-800-433-7327
 - fsa.customer.support@ed.gov
- *For Students*
 - Federal Student Aid Information Center (FSAIC)
 - 1-800-4FED-AID

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My Supervisor Requests Your Feedback

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Session Name: NDASFAA 2016 SAP

