Satisfactory Academic Progress (SAP) and COVID-19

March 20, 2020

Issue
Students who receive Title IV financial aid must meet satisfactory academic progress in their degree programs. Students who do not make sufficient progress and have their aid denied on that ground are entitled to appeal. A student demonstrating that COVID-19 caused hardships may base an appeal on these grounds.

Impacted
This issue impacts an institution’s administrators in charge of accreditation, regulatory compliance, financial aid, and academic affairs.

Effective Dates
According to USED, this flexibility applies “to students who enroll in payment periods that begin on or before June 1, 2020.” USED has not extended this flexibility beyond this date.

Background
According to 34 CFR § 668.34(a)(9), an institution must establish a reasonable policy for determining whether an otherwise eligible student is making satisfactory academic progress (SAP). An institution may suspend the aid for students who do not make SAP. For students who do not make satisfactory academic progress and lose their aid on that ground, institutions may include an appeal policy.

An institution’s SAP appeal policy must, among other things, describe the basis on which a student may file an appeal: the death of a relative, an injury or illness of the student, or other special circumstances. 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 may form the basis of a student’s SAP appeal even if not specifically articulated in the institution’s SAP policy.

Recommended Action(s)
- Revise appeal process: Explicitly include COVID-19 as ground for appeal.
- Alert students to this ground for appeal: Put students first.
- Continue to run SAP: According to a March 17 webinar from NASFAA, institutions may not suspend the running of SAP at this time.
- Keep a written record: “We [USED] recommend that institutions document, as contemporaneously as possible, any actions taken as a result of COVID-19.”

Applicable regulations and policies
The USED Memo of March 5; 34 CFR § 668.34(a)(9);
Natl Assn of Student Fin Aid Admins’ “COVID-19 and Federal Student Aid” Webinar (March 17)