

Satisfactory Academic Progress Policies and Student Aid Eligibility: A National Evaluation

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Executive Summary

Higher education remains a critical determinant of economic mobility in the United States. Federal financial aid plays a crucial role in making postsecondary institutions affordable for millions of low-income students each year. To encourage students to remain on track for degree completion, Congress also mandates that institutions monitor whether students are making satisfactory academic progress (SAP) to maintain eligibility for federal student aid.

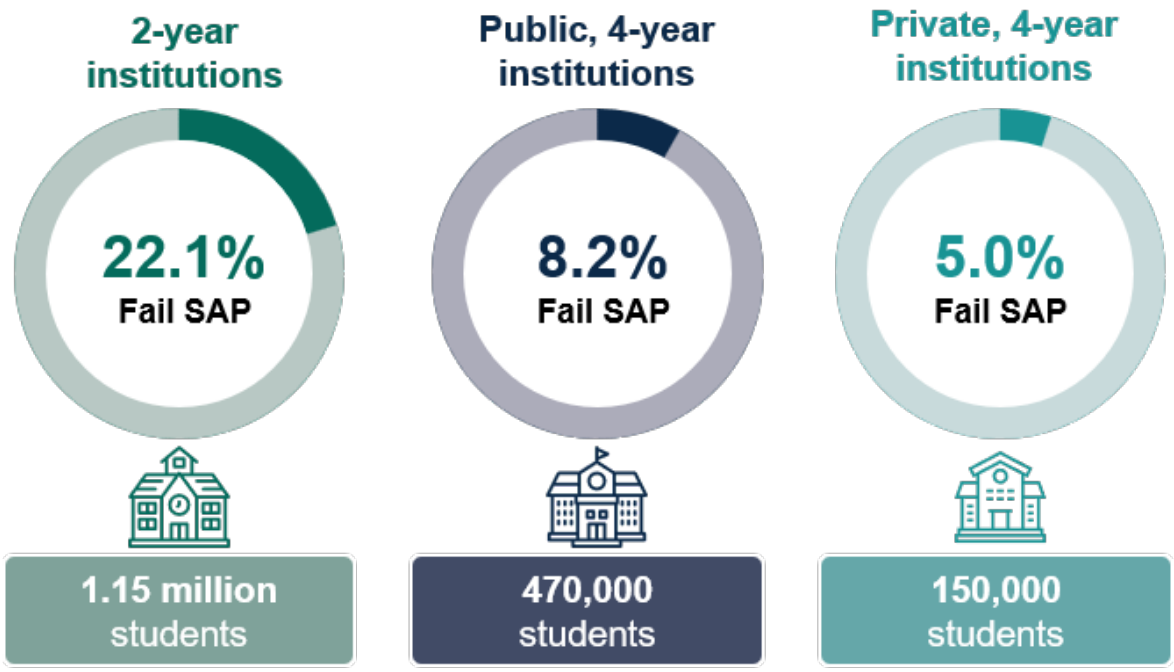
There are many open questions about how SAP is implemented and the role SAP policies can play in helping or hindering students seeking to complete a postsecondary degree. Federal regulations establish key SAP requirements but also give institutions the flexibility to define important aspects of these requirements, develop practices to support students in making SAP, and apply discretionary procedures for students who are at risk or fail to make SAP, such as the conditions for a successful appeal to retain financial aid eligibility (34 CFR § 668.34). Despite the importance of these requirements for students who depend on financial aid, little is known about how many students are struggling to meet federal SAP requirements, how strictly or leniently institutions set SAP standards, and how institutions differ in how they support students to maintain aid eligibility. Understanding these issues is an important first step towards identifying how SAP implementation can best support student success.

This study seeks to answer each of these questions for the first time using data from an enrollment-weighted national sample of 2- and 4-year institutions (including for-profit institutions) and insights from a rich set of interviews with students, financial aid administrators, and academic advising and financial aid support staff. Results from this study provide the first clear picture of the number of students failing to meet SAP requirements each year and the extent of variation across institutions in SAP standards and student supports.

Nationally, more than one in 10 undergraduate students failed to meet SAP requirements in spring 2025, during end-of-term or end-of-year evaluations. Most students in the U.S. attend an institution that evaluates SAP once per payment period, as opposed to once per academic year. During the spring 2025 SAP evaluation for these institutions (or at the end of the 2024–25 academic year, for institutions that evaluate SAP once per year), 13 percent of undergraduate students in the U.S. failed to meet SAP requirements. The failure rate was higher for students at 2-year institutions (22 percent), compared to public 4-year institutions (8 percent) or private 4-year institutions (5 percent) (Exhibit ES.1).[1] In total, this translates to approximately 1.8 million credential-seeking undergraduates failing SAP requirements, meaning they were at risk of losing eligibility for federal financial aid.

[1] The study's sample of institutions providing data on SAP failure rates included fewer than 10 for-profit colleges—a sample size that is too small to reliably estimate SAP failure rates at for-profit institutions.

Exhibit ES.1. Estimated percentage and number of students failing SAP nationally, by sector, in spring 2025 end-of-term or end-of-year evaluations



Source: FAA survey and IPEDS 2023–24 Institutional Characteristics and Fall 2024 Enrollment components.

Notes: The percentage of students failing to meet SAP requirements was calculated among 194 FAA survey responses using nonresponse weights. The number of students shown in each category is the total number of credential-seeking undergraduates reported for each sector (2-year, public 4-year, and private 4-year) from the IPEDS 2024 fall enrollment data. The number of enrolled students failing to meet SAP requirements in each sector was estimated by multiplying the percentage of students failing SAP in each sector by the corresponding sector-specific undergraduate enrollment totals. These numbers are rounded to the nearest 10,000.

FAA = financial aid administrator; IPEDS = Integrated Postsecondary Education Data System; SAP = satisfactory academic progress.

Financial aid administrators surveyed and interviewed for this study most often identified first-generation, low-income, and first-year students as groups that struggle to meet SAP requirements—often due to a lack of information about how SAP rules work (for example, being unaware of a minimum grade point average [GPA] standard) and the absence of strong support networks to help students navigate life circumstances such as work obligations, family caregiving commitments, or health challenges.

Just over half of students who failed to meet SAP requirements lost access to federal financial aid the following term. In other words, approximately 970,000 undergraduates lost federal aid eligibility in the spring 2025 SAP evaluation round. Federal regulations offer institutions some flexibility to support students after they fail SAP requirements, such as allowing institutions to grant appeals to students under certain circumstances or allowing them to offer students a warning term, if the institution evaluates SAP more than once per year. In practice, only one-quarter of students who failed SAP filed an appeal, even though all institutions allowed appeals and most appeals succeeded in preserving aid eligibility for at least one term.

Most institutions are not choosing to adopt optional policies that would make SAP more lenient. For example, only about one-quarter of students attend institutions with a laddered GPA requirement in

the first two academic years, and only about one in 10 attend an institution with a laddered pace-of-progress requirement in the first two academic years (as defined in federal regulations, these options allow institutions to use more lenient requirements in earlier academic terms). In addition, roughly 2 in 3 students attend institutions that count developmental courses (sometimes referred to as remedial courses) toward the maximum time frame requirement. These courses do not count toward a student's degree but are required for students who are not academically ready for other college-level courses. Counting developmental coursework toward the maximum time frame standard may make SAP harder, because students in developmental courses must attempt and pass more courses in total to complete their degree. In interviews, financial aid administrators cited pressure to conform with peer institutions, as well as the staffing burden associated with shifting complex financial aid policies as barriers to revising SAP. In addition, some institutions deliberately choose stricter SAP requirements to align with the institution's higher overall academic standards or to encourage students who are unlikely to be successful in the short term to withdraw rather than incur further student loans (in some circumstances, withdrawing from a program early, with less debt, could better position some students to return to college in the future). In other settings, state legislatures can also play an active role in requiring a specific SAP approach (such as recent legislation in California that prohibited institutions from imposing SAP requirements that are stricter than the federal minimum).

Institutions have many opportunities to improve how they communicate about SAP requirements and support students in maintaining aid eligibility. Most institutions rely on websites and email, but these channels have significant limitations, as websites can be difficult to navigate or interpret, and students reported in interviews that they often experience email fatigue. Multi-modal and individualized communication, paired with proactive outreach early on in a student's program, may be more effective. There are also opportunities to improve student advisory supports. Although students who fail to meet SAP do commonly have access to an advisor, this is far less common for the broader population of students who are *at risk* of failing to meet SAP. Interviewed students expressed a strong desire for more personalized advising and proactive outreach throughout the term, rather than waiting until after they receive a negative SAP evaluation. There is also a strong desire for improved coordination across financial aid and academic advising support staff to improve the consistency and accuracy of SAP-related guidance. For example, academic staff may encourage students to withdraw from courses to protect their GPA, without realizing that withdrawals can negatively affect SAP evaluations under pace-of-progress requirements that count a withdrawal similarly to a course failure.

These findings provide important evidence on how SAP regulations affect students nationwide and provide timely information to inform ongoing federal and state policy debates about SAP standards. Each term, hundreds of thousands of students lose access to financial aid— outcomes that are directly affected by policy decisions governing SAP requirements and institutional choices about how those requirements are implemented. Although a great deal remains to be learned about the relationship between specific SAP approaches and longer-run student outcomes, the potential consequences of these decisions are substantial. This study highlights numerous opportunities to reconsider how SAP policies, procedures, and student supports could help more students to maintain access to financial aid, persist in college, and earn a degree.

Introduction

Higher education remains a critical determinant of economic mobility in the United States, but its high costs limit access for millions of students from low-income families (Zhang et al. 2024). To make higher education more affordable, Title IV of the Higher Education Act authorized programs that support millions of low-income students each year. Administered by the U.S. Department of Education's office of Federal Student Aid (FSA), in 2023 these programs included Pell Grants providing six million undergraduates with grants averaging $4,500, the campus-based Federal Supplemental Educational Opportunity Grant Program providing 1.8 million students an average of $800 per year, and the campus-based Federal Work-Study program providing part-time jobs to 400,000 students earning an average of $2,000 per year (Ma and Pender 2023). In addition, 28 percent of all Title IV loans were reserved for undergraduate students with documented financial need, with an average initial loan amount of $6,700 (FSA 2023; National Center for Education Statistics n.d.). Without this aid, many students with limited resources would struggle to attend institutions of higher education (Dynarski et al. 2022).

To encourage students to remain on track for degree completion and conserve public funding, Title IV mandates that institutions of higher education monitor whether students are making satisfactory academic progress (SAP) to maintain eligibility for federal student aid. Federal regulations establish a set of key SAP requirements but also give institutions the flexibility to define important aspects of these requirements, develop practices to support students in making SAP, and apply certain discretionary procedures for students who fail to make SAP (34 CFR § 668.34). For students, SAP outcomes matter a great deal: failing SAP, and in turn losing financial aid, may negatively impact their enrollment, persistence, credit accumulation, and degree completion (Schudde and Scott-Clayton 2016; LaSota et al. 2022). Advocates have also long argued that SAP policies may disproportionately affect nontraditional students, adult learners, and returning students who face challenges (such as balancing work or caregiving responsibilities) that disrupt academic performance (Davis and Duke-Benfield 2023).

Because SAP requirements are such an important potential driver of student outcomes, SAP has been an active area of policy debate in recent years. During the COVID-19 pandemic, Congress authorized additional exemptions from SAP requirements (these Coronavirus Aid, Relief, and Economic Security [CARES] Act provisions ended in spring 2023). In 2020, the U.S. Senate also considered draft legislation that would have encouraged use of SAP warning periods and made it easier to re-qualify for aid after withdrawing from higher education (Satisfactory Academic Progress Reset and Reform Act 2020). Policymakers have also debated SAP requirements actively at the state level. In October 2023, California passed a bill that prohibited institutions from imposing SAP requirements that are stricter than the federal minimum and encouraged more lenient SAP appeal procedures (AB 789, California Act to Amend Section 69432.7 of the Education Code 2023). Many states also maintain their own financial aid programs with distinct SAP requirements. For example, the largest postsecondary grant program in Texas requires students to maintain a higher grade point average (GPA) than the federal SAP minimum (Texas Higher Education Coordinating Board 2023)—this may encourage institutions in Texas to set stricter requirements to ease the administrative complexity of tracking multiple SAP standards and make it easier to explain these standards to students.

Importantly, policy debates surrounding SAP center around whether these academic standards could ultimately be helpful to students (by encouraging stronger academic performance or encouraging students to withdraw if they are truly unlikely to graduate) or whether they harm students by withholding financial aid too aggressively (for example, in cases where students could have recovered academically with adequate supports). The best current evidence on these questions comes from an impact study in a community college network with relatively strict SAP standards (requiring students to attain a 2.0 GPA at the end of Year 1). The authors found that failing SAP after the first year of college did encourage some students to subsequently boost their GPAs and pass courses at a higher rate, but, on average, failing SAP hurt these students in the long run by reducing degree completion rates and future earnings (Scott-Clayton and Schudde 2020). This work raises important questions about how strict or lenient SAP policies should be—for example, it is possible that a "laddered" GPA policy (setting a more lenient GPA standard in Year 1) could have allowed more of these students to complete their degree and improve longer-run outcomes. We do not yet know whether and how potential SAP reforms could affect students' aid eligibility and persistence rates. For example, a recent qualitative case study found that aligning institutional SAP policies with the minimum federal standards may improve student retention, particularly for minority populations (Taylor et al. 2024), but these policy reforms have not been rigorously evaluated or examined outside of a handful of institutions.

In short, despite the central role of SAP requirements in the financial aid system and the active debate about whether SAP regulations should be updated, little is known about how many students are struggling to meet federal SAP requirements, how strict or lenient institutions are being with SAP policies, or how different higher education programs are approaching the process of supporting students to maintain aid eligibility. This study seeks to answer each of these questions for the first time, using data from an enrollment-weighted national sample of 2- and 4-year institutions (including a representative sample of for-profit institutions) and insights from a rich set of interviews with students, college financial aid administrators, and academic advising and financial aid support staff.

What is SAP, and how can SAP implementation vary?

SAP is codified under Title IV of the Higher Education Act, which authorizes federal financial aid. Students must meet SAP requirements to remain eligible for all types of federal aid, such as the Pell Grant, subsidized and unsubsidized direct loans, and work-study programs. Institutions must establish SAP requirements that are at least as strict as a set of minimum federal requirements, though institutions are free to set stricter rules. The federal standards also offer some flexibility in terms of how policies are defined and implemented (discussed further below). Importantly, each program's SAP requirements cannot be more lenient than the academic requirements for other students who do not receive federal aid. The goal of these requirements is to direct federal aid to students who are on track to graduate in good academic standing, while requiring institutions to monitor student progress against a minimum academic standard.

Overview of SAP components

SAP policy requires institutions to specify requirements in three areas.



GPA standard. Institutions must establish a GPA for students to meet at each evaluation point. For programs that are more than two academic years, students must have at least a C average or its equivalent (a 2.0 GPA on a 4.0 scale) or must have an academic standing consistent with the school's graduation requirements.



Pace-of-progress standard. Institutions must specify the pace at which students must progress through their program to complete it within the maximum time frame. This is usually calculated by dividing the total credit hours a student has completed by the total number attempted or by determining the number of hours a student should have completed by an evaluation point to stay on track to complete a program within the maximum time frame. The pace standard is often interpreted as a 67-percent minimum course completion rate**,** which students would need if the institution had a 150-percent maximum time frame standard. For example, a student who has attempted 30 credit hours must have successfully completed at least 20 of them (67 percent) to remain eligible for aid.



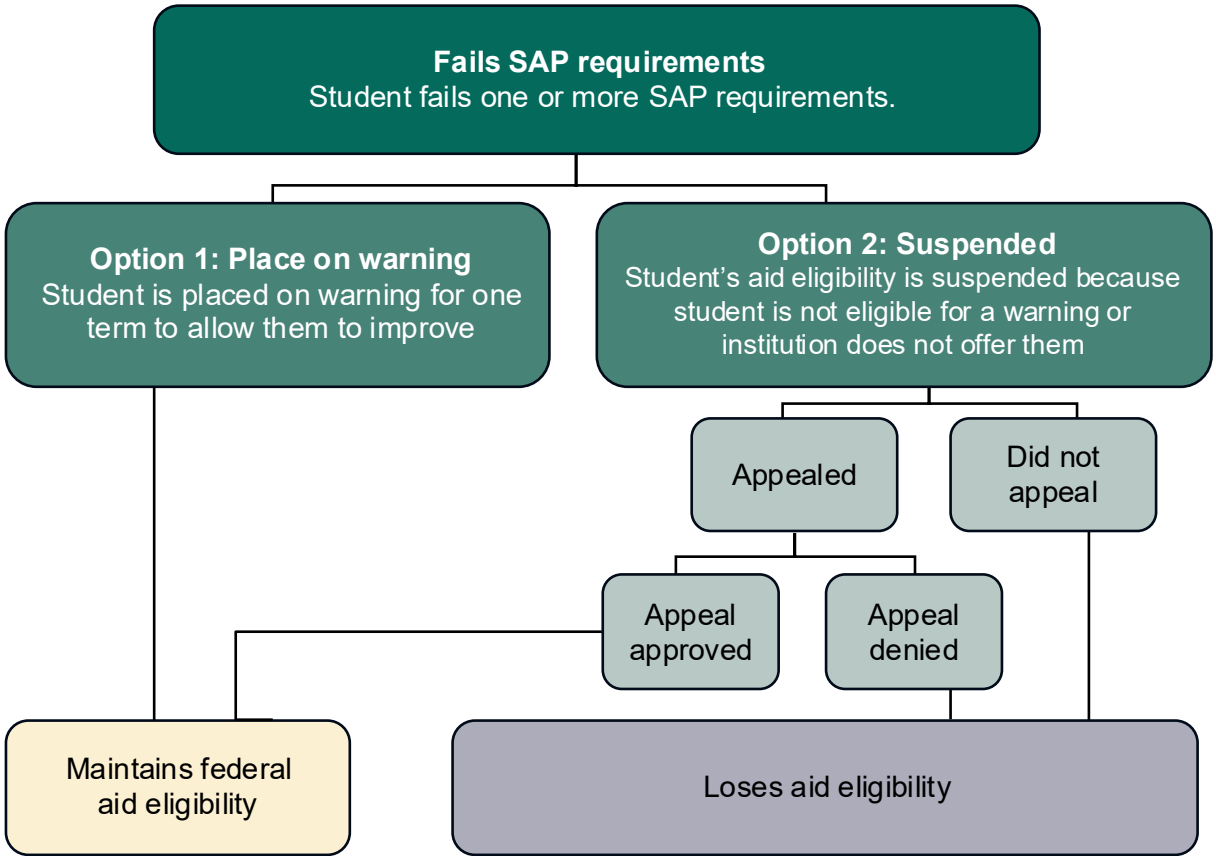
Maximum time frame standard. Institutions must ensure students are able to complete their program within a period no longer than 150 percent of the published length of the program in credit hours or expressed in calendar time. For example, a student enrolled in a 120-credit-hour program must be able to complete their degree within 180 attempted credit hours (120 × 1.5). If the student has attempted 150 credit hours but has completed less than 90, they will fail the maximum time frame standard because it is not possible for them to complete their degree without attempting more than 180 credit hours.

Students are evaluated to determine if they meet SAP requirements either at the end of each term or once per academic year. During each review, students face several possible outcomes (Exhibit 1). If students meet all three SAP requirements, they will remain eligible for federal financial aid until the next SAP evaluation occurs. However, if a student fails the GPA standard or pace-of-progress standard, they could receive a one-term warning (this is an option when the institution evaluates SAP at the end of each term and uses warnings, and the student was not already placed on warning at the prior SAP evaluation).[2]

[2] Students can go on warning status if they fail SAP in a given term as long as they had not failed SAP in the prior term. In other words, if a student has failed two consecutive terms, they cannot be placed on warning status. See Program Integrity Questions and Answers - Satisfactory Academic Progress | U.S. Department of Education for more information.

Otherwise, those who fail to meet SAP standards will lose their aid eligibility from the next term onwards (unless they can find a way without federal financial aid to recover academically and meet SAP standards in the future). Students whose aid eligibility is suspended may be able to appeal their status (in practice, all of the institutions in this study's sample offered appeals). If an appeal is approved, the student will be placed on probation for the following term and will continue to be eligible for federal aid. An approved appeal may also include an academic plan that allows students to maintain aid eligibility over multiple terms, provided they meet the requirements in their academic plan. At the end of the probation term or academic plan, a student must recover academically and pass SAP standards to maintain aid eligibility for the following term. If a student does not submit an appeal or the appeal is not accepted, the student will lose aid eligibility the next term.

Exhibit 1. Students' potential outcomes after failing a SAP evaluation



SAP = satisfactory academic progress.

Importantly, the details of these SAP policies can vary substantially across institutions. Although the SAP legislation establishes specific requirements in many areas, SAP policies (and decisions about how to implement those policies) can also vary significantly in ways that make it easier (or harder) for students to maintain aid eligibility. Some important forms of flexibility include the following (also see Appendix A for a more detailed explanation of SAP regulations and flexibilities):

- **Using the most lenient allowable SAP standards for GPA and pace of progress**. Federal rules require 4-year programs to set a GPA requirement at the end of the second academic year of at least a

C or its equivalent (or a standing consistent with graduation requirements) and establish a pace-of-progress requirement (typically a 67-percent course completion rate) that is consistent with completing a program within its maximum time frame. But programs may use lower GPA and pace-of-progress requirements in the first program year and build up to more stringent standards in Year 2 (referred to as laddering). Similarly, institutions may choose to require students to attain a minimum GPA and course completion rate in each and every term in addition to evaluating GPAs and pace of progress cumulatively over multiple terms.

- **Choosing how to define which courses count**. When evaluating students against SAP requirements, programs may also choose to take a strict approach in including all possible course types. More lenient policies that exclude certain types of courses (such as developmental courses, early course withdrawals, and/or transfer courses from prior majors or institutions that do not apply to a student's current major) could make it easier to meet SAP requirements in certain circumstances. Recent state legislation in California placed particular emphasis on leniency in these areas (see box). Institutions may also choose to use a calendar time calculation for pace of progress, by establishing a minimum number of cumulative credits across enrollment terms instead of requiring a certain course completion rate—that approach may be less flexible and accommodating for students who are enrolled part-time.
- **Establishing more flexible procedures for SAP evaluation frequency, warnings, and appeals.** Institutions are allowed to choose whether to evaluate SAP annually versus doing SAP evaluations at the end of each term. Evaluating by term gives programs the flexibility to provide a warning term during which students can recover academically and still receive aid. On the other hand, some institutions may prefer to evaluate SAP annually, which could allow the school to more informally coach students between semesters about the need to improve their grades, give students a longer window to submit SAP appeals between academic years, or reduce administrative burden for staff. Institutions may also establish a wide range of procedures for how students file appeals, including submission deadlines, paperwork requirements, whether to take a broad interpretation of the federal rules that allow "special circumstances" to be a valid reason for approving an appeal, and whether to allow students to file multiple appeals during their course of study.

Recent legislation in California requires institutions to use a more lenient SAP approach

In 2023, the California state legislature enacted AB 789 which requires institutions to adopt SAP policies and procedures that are consistent with the most lenient approach federal regulations allow (for more details, see the legislation's implementation toolkit, published by John Burton Advocates for Youth). Examples of required SAP approaches in California include the following:

- Setting GPA and pace-of-progress requirements equal to the minimum federal standard
- Evaluating GPA and pace of progress on a cumulative basis, not by term
- Excluding developmental coursework and transfer credits from unrelated programs or majors when evaluating students against the maximum time frame limit
- Notifying students proactively about SAP rules and appeal options, using nontechnical language
- Using accommodating procedures for SAP appeals (for example, accepting electronic appeal submissions and waiving requirements for third-party verification of special circumstances)

Apart from these specific policies and procedures, financial aid and academic support offices also face a wide range of choices about how best to communicate information about SAP to students and deliver the

types of wraparound counseling and academic supports that could help students to meet SAP requirements. Programs may also choose to deliver more intensive counseling interventions to help students who fail SAP requirements to maintain aid eligibility and recover academically. In addition to providing the first nationally representative estimate of how many students are failing SAP requirements, this study also investigates how strict or lenient institutions are in their choices about SAP policies and procedures and examines the types of SAP-related supports they are choosing to deliver.

Methods and data sources

Mathematica used a mixed methods design to examine how institutions defined and implemented SAP requirements. First, the study team reviewed publicly available information on institutions' SAP policies for undergraduate students from a randomly selected, enrollment-weighted sample of 1,200 2- and 4-year institutions in the U.S.[3] Given this sampling approach, the study's results describe the average set of SAP policies and SAP-related outcomes experienced by undergraduate students in the U.S. (see Appendix B for further details on the sampling and weighting process). Trained research staff systematically reviewed institution websites to collect standardized information on qualitative and quantitative SAP requirements, including frequency of their SAP evaluations and their requirements for the GPA, pace-of-progress, and maximum time frame standards for undergraduate students.

The study team complemented the website review with a survey of the same institutions.[4] The survey, fielded with support from the National Association of Student Financial Aid Administrators (NASFAA), gathered information from financial aid administrators on SAP implementation practices, communication strategies, appeals and probation procedures, academic support services, and aggregate student outcomes related to SAP and financial aid eligibility. Financial aid administrators reported aggregate student outcomes based on the 2024–25 year, if they evaluate SAP each academic year, or based on the spring 2025 term, if they evaluate SAP each term. Survey instruments were pre-tested to minimize respondent burden and ensure consistent interpretation across institution types. In total, 220 institutions completed the survey, for an 18-percent response rate. The resulting survey sample is representative of the broader population of institutions in the sampling frame (Appendix Exhibit B.3). Nonresponse weights were used to adjust for modest differences in response rates across different types of institutions. In summary, the survey sample is a nationally representative, enrollment-weighted sample of institutions that describes the typical SAP environment experienced by an average undergraduate student in the U.S.

To provide deeper contextual understanding, the study also conducted semi-structured interviews with financial aid administrators and academic advising and financial aid support staff and focus groups with students across 22 institutions. These qualitative data collection and analysis activities explored how institutions operationalized SAP policies, how students understood and navigated SAP requirements, and what barriers or supports most influenced students' ability to maintain financial aid eligibility and persist in college. We spoke with 29 financial aid administrators, 12 academic advising or financial aid support staff, and 14 students across 22 institutions.

[3] Two- and 4-year institutions were defined based on the types of degrees offered. Four-year institutions are defined as those that primarily award baccalaureate degrees or above (more than 50 percent of degrees), whereas 2-year institutions are those that offer associate degrees or those that award baccalaureate degrees or above but not primarily (less than 50 percent of their degrees). The sample only includes Title IV institutions in the U.S. that offer an undergraduate degree and excludes institutions that only offer undergraduate certificates.

[4] The survey excluded three institutions from the original sample that we discovered were no longer operating during the website review.

How many students fail to meet SAP requirements?

Although SAP requirements affect millions of students receiving federal aid, up to this point it has not been clear how many students fail to meet SAP requirements in the United States. This study addresses this question by collecting data from a nationally representative sample of 2- and 4-year institutions, which makes it possible to estimate how many undergraduate students fail SAP during a typical SAP evaluation. Specifically, the study team surveyed financial aid officers at sampled institutions about SAP outcomes during their spring 2025 SAP evaluation (for institutions that evaluated SAP at the end of each payment period) or during their 2024–25 SAP evaluation (for institutions that evaluated SAP once per year).

Nationally, more than one in 10 undergraduate students failed to meet SAP requirements during the spring 2025 end-of-term or end-of-year evaluation, which translates to over 1.8 million credential-seeking undergraduates.

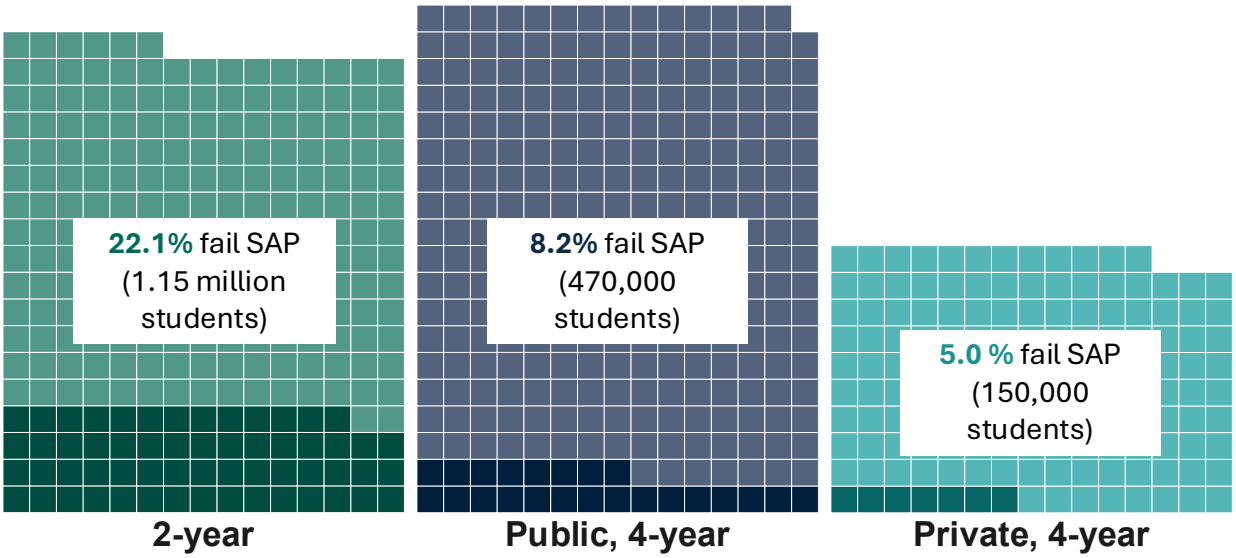
On average, 13 percent of undergraduate students nationally failed to meet SAP requirements during SAP evaluations from spring 2025 (for institutions that evaluate SAP at the end of each term) or for the 2024–25 academic year (for institutions that evaluate SAP once per academic year).[5] To put this number in context, this implies that over 1.8 million credential-seeking students in the U.S. failed SAP requirements during these SAP evaluations.[6] In addition, because most institutions evaluate SAP multiple times per year at the end of each term, the total number of students who failed SAP at any point during the 2024–25 academic year was higher than the estimates presented here.

[5] The margin of error was +/- 1.5 percentage points.

[6] This is an estimate of the number of degree or certificate-seeking undergraduate students that failed SAP during the spring 2025 term (for those at institutions that evaluate SAP at the end of each term) or during the 2024–25 academic year (for those that evaluate SAP once per year). It uses the 2024 fall undergraduate enrollment for degree or certificate-seeking students from the Integrated Postsecondary Education Data System (IPEDS) to estimate the total number of students nationally that fail SAP. Although IPEDS does not provide a separate undergraduate enrollment count for the spring semester, the National Student Clearinghouse (NSC) serves as an alternative data source that does have a national enrollment count separately for the spring semester. If we were to use NSC's spring enrollment count, the estimate of the number of students failing SAP would be quite similar (1.78 million students, as opposed to 1.81 million). With either approach, our estimate is likely a lower bound estimate of the total number of students that fail SAP in that (1) for institutions that evaluate SAP each term, the spring term likely has a similar or lower failure rate than the fall term (as the students most likely to fail SAP may leave before the spring term); and (2) for institutions that evaluate SAP once per academic year, using fall enrollment for this estimate likely underestimates the total number of students affected (as additional students may enroll only in the spring or summer).

The share of students failing to meet SAP requirements was highest at 2-year institutions, on average (Exhibit 2). Twenty-two percent of students at 2-year institutions who are assessed for SAP failed to meet SAP requirements, compared to 8 percent at 4-year public institutions and 5 percent at 4-year private institutions (Appendix Exhibit C.1).[7,8,9]

Exhibit 2. Estimated percentage and number of students failing SAP nationally, by sector, in spring 2025 end-of-term or end-of-year evaluations



Source: FAA survey and IPEDS 2023–24 Institutional Characteristics and Fall 2024 Enrollment components.
Notes: The percentage of students failing to meet SAP requirements was calculated among 194 FAA survey responses using nonresponse weights. Each waffle box above represents 20,000 students. The number of students shown in each category is the total number of credential-seeking undergraduates reported for each sector (2-year, public 4-year, and private 4-year) from the IPEDS 2024 fall enrollment data. The number of enrolled students failing to meet SAP requirements in each sector was estimated by multiplying the percentage of students failing SAP in each sector by the corresponding sector-specific undergraduate enrollment totals. These numbers are rounded to the nearest 10,000.
FAA = financial aid administrator; IPEDS = Integrated Postsecondary Education Data System; SAP = satisfactory academic progress.

Institutions serving large shares of Black students or Hispanic students (those in which over one-quarter of students are Black or over one-quarter are Hispanic) tended to have slightly higher shares of students failing SAP. Fifteen percent of students attending institutions serving more Black students or Hispanic students failed SAP during the spring 2025 or 2024–25 academic year SAP evaluations, compared to 12

[7] This pattern of results across sectors is not explained by differences in how frequently institutions assess SAP. Although almost all 2-year institutions assess SAP at the end of each payment period (term), SAP failure rates among 4-year institutions are similar, on average, among 4-year public institutions and among 4-year private institutions, regardless of whether they assess SAP at the end of each payment period or at the end of each academic year.

[8] The share of students failing SAP at 2-year institutions is consistent with existing evidence on SAP failure rates from specific community college systems. For example, Scott-Clayton and Schudde (2016) found 15 percent of students in a state community college system were falling beneath the 2.0 GPA threshold for SAP. Another report from John Burton Advocates for Youth (2021) found 32 percent of Pell Grant recipients in California community colleges did not meet the 2.0 GPA threshold for SAP in their first year.

[9] The study's sample of institutions providing data on SAP failure rates included fewer than 10 for-profit colleges—a sample size that is too small to reliably estimate SAP failure rates at for-profit institutions. Given the small sample size, the study was not able to determine if there are differences between SAP failure rates at for-profit institutions and other types of institutions.

percent at other institutions. Among 4-year institutions, substantially fewer students failed SAP at selective institutions than inclusive institutions.[10]

Students failed the GPA and pace-of-progress requirements at similar rates. Failing the maximum time frame standard was less common.

Prior to this study, little was known about whether students struggle more often to meet GPA requirements or pace-of-progress requirements. In practice, we find that failure rates are similar for the two requirements, with 5 percent of students failing the GPA requirement and 6 percent failing the pace-of-progress requirement, on average, nationally. In comparison, only 3 percent failed the maximum time frame requirement.

Failure rates for each standard were higher at 2-year institutions than 4-year institutions. At 2-year institutions, 10 percent of students failed the pace-of-progress requirement, 8 percent failed the GPA requirement, and 7 percent failed the maximum time frame standard.[11] At 4-year institutions, 4 percent of students failed the GPA requirement, 4 percent failed the pace requirement, and only 1 percent failed the maximum time frame requirement (Appendix Exhibit C.2).

Just over half of students who failed SAP lost eligibility for federal financial aid for the next term.

Among students who failed to meet SAP requirements, 54 percent (approximately 970,000 students nationally) lost access to financial aid during the spring 2025 or 2024–25 academic year SAP evaluations.[12] Students who fail SAP during an evaluation can maintain eligibility for financial aid in the next term if they are placed on warning status or if they file a successful SAP appeal. Other students can lose aid eligibility because they were already on warning status after failing SAP in prior periods and are not eligible for a warning, their institution does not offer warnings, they chose not to file an appeal, or they applied for an appeal but had it denied. Prior to this study, little information was available about how many students used one of the options that make it possible to maintain aid eligibility after failing a SAP evaluation.

[10] Inclusive institutions tended to have more students failing SAP (9 percent) compared to selective institutions (6 percent) or more selective institutions (3 percent). Institutional selectivity categories were derived from 2021 Carnegie Undergraduate Profile Classifications, as reported in IPEDS. Selective institutions are those in which admitted first-year students' test scores are in the 40th to 80th percentile of selectivity among all baccalaureate institutions. More selective institutions are those in which admitted first-year students' test scores are in the 80th to 100th percentile of selectivity among baccalaureate institutions. Institutional selectivity was only studied at 4-year institutions.

[11] Not all institutions that shared information about the number of students failing SAP were able to share information about the number of students failing each standard. Approximately half (96 institutions) shared information about the percentage of students failing each standard that passed all data validation checks. See Appendix Exhibit C.2 for additional details.

[12] 103 institutions report information about the number of students failing SAP, the number of students on warning, the number who appealed, and the number of appeals approved that passed all data validation checks. We use this sample of institutions for findings related to the share of students who lost aid eligibility, the share that received warnings, the share that submitted appeals, and the share with appeals approved to ensure the sample is constant across these reported values. Institutions that cannot use warnings (because they evaluate at the end of the academic year instead of by term) or that do not choose to use warnings are assumed to have no students on warning status. See Appendix Exhibit C.4 for additional details.

These estimates reveal that a majority of students who fail SAP requirements do in fact lose their eligibility for financial aid.

A roughly similar percentage of students who failed SAP lost aid at 4-year public institutions (63 percent) and 2-year institutions (59 percent), though only 39 percent of students at 4-year private institutions lost access to aid in the next term. Differences were modest in the share of students losing aid among institutions that are more or less selective, and among institutions that do or do not enroll large shares of Black or Hispanic students (Appendix Exhibit C.3).[13]

About one-quarter of students who failed SAP did not lose eligibility for aid because they were placed on warning status.

Among those students who fail to meet SAP requirements during the spring 2025 or 2024–25 academic year SAP evaluations, 27 percent were placed on warning status.[14] Warnings were most common for students at 4-year private institutions (37 percent), followed by 2-year institutions (27 percent) and 4-year public institutions (18 percent; Appendix Exhibit C.4).[15]

Only one-quarter of students who failed SAP filed an appeal, even though most appeals succeeded in preserving aid eligibility for at least one term.

Only one-quarter of students who failed SAP (24 percent) appealed their decision. To put this number in context, 27 percent of students who failed SAP during the spring 2025 or 2024–25 academic year SAP evaluations received a warning that allowed them to maintain aid eligibility for the next term, meaning the remaining 73 percent would likely have lost aid eligibility unless they filed an appeal.[16] Most of these students did not file an appeal, even though all of the institutions in the study sample allow appeals. This represents an important missed opportunity for students and the institutions responsible for supporting them in understanding SAP procedures, as these students were faced with the immediate loss of their eligibility for financial aid. Students who failed SAP requirements at 2-year institutions were less likely to file appeals (19 percent) than those at 4-year institutions (27 percent for 4-year private institutions; 26 percent at 4-year public institutions) (Appendix Exhibit C.4).

[13] Students at institutions with large shares of Black students or Hispanic students are slightly more likely to have lost aid eligibility (59 percent) than those at other institutions (52 percent). Students at institutions with a larger share of older students (one-third of students age 25 or older) were slightly less likely to lose aid eligibility (52 percent) than those at other institutions (55 percent). Differences were also small between institutions with a high share of Pell Grant recipients (56 percent) and other institutions (54 percent). Similarly, among 4-year institutions, 53 percent of students who failed SAP at inclusive institutions lost aid eligibility, whereas 51 percent lost aid eligibility at selective institutions and 50 percent lost aid eligibility at more selective institutions (Appendix Exhibit C.3).

[14] Among students enrolled at institutions that offer warnings, 43 percent of students who failed to meet SAP requirements were placed on warning status.

[15] Warning status is only available for students who were not failing SAP in the prior SAP evaluation and who are enrolled at an institution that offers warnings, which is almost all 2-year institutions (89 percent) and about two-thirds of 4-year institutions (67 percent).

[16] In some cases, students may not have needed to file an appeal. If a student was on an academic plan arising from a successful appeal in a prior term, they did not need to appeal again to maintain aid eligibility.

Even though the share of students filing an appeal was relatively small, most SAP appeals were successful in preserving students' aid eligibility. Three-quarters of students who failed SAP and filed an appeal were successful in appealing their loss of aid eligibility. Students at 4-year public institutions and 2-year institutions had appeals approved at similar rates (71 percent and 72 percent, respectively), whereas students at 4-year private institutions had a higher success rate in their appeals (83 percent). Overall, only 19 percent of students who failed SAP filed successful appeals (Appendix Exhibit C.4). This indicates that a strong majority of students who fail SAP requirements do not successfully navigate the appeals process to preserve their financial aid eligibility, most often because they do not file an appeal in the first place.

Who are the students struggling with SAP requirements and maintaining access to financial aid?

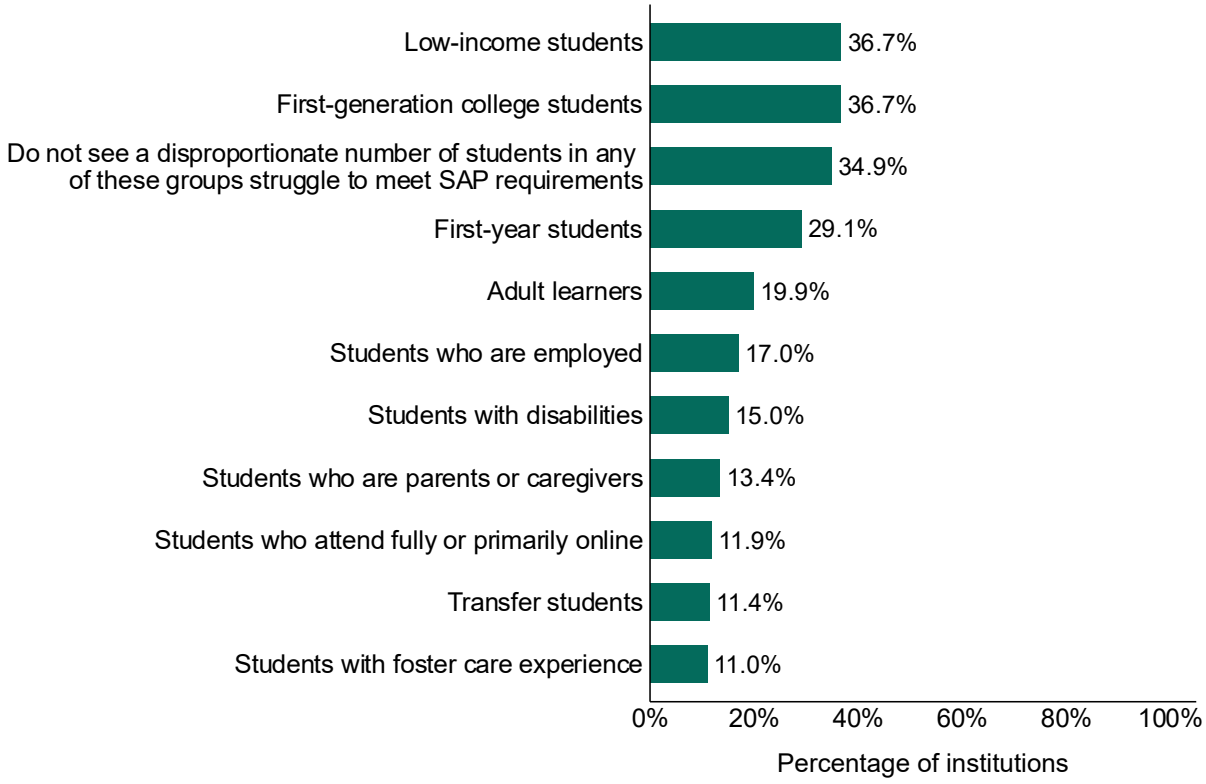
This study's national survey of financial aid administrators gathered information about which types of students are at greatest risk for failing SAP requirements. Examining these data can help policymakers understand the potential effects of SAP regulations on different groups of students and help institutions prioritize SAP-related supports for the students who need help the most.

First-generation, low-income, and first-year students often struggle to meet SAP requirements.

SAP challenges can be especially acute for students who may not have support systems to help them navigate higher education. Thirty-seven percent of institutions in the enrollment-weighted survey sample noted that first-generation and low-income students were the most likely to struggle to meet SAP requirements (Exhibit 3). First-generation students, in particular, may have less access to guidance from others who understand college expectations, academic progress requirements, or how to navigate student support services. Low-income students also commonly struggle with SAP requirements (John Burton Advocates for Youth 2021). In interviews, financial aid staff also described how certain low-income students struggle to manage the need to divert time and energy away from school to work one or more jobs.

> "I have students that are extremely low-income and don't have access to resources. They do have to choose work or [caring for a loved one] over school.
>
> Financial aid administrator

Exhibit 3. Percent of institutions reporting that a student group struggles disproportionately to meet SAP requirements (enrollment-weighted)



Source: FAA survey.

Notes: N = 211 responding institutions. Institutions can indicate multiple groups so percentages will not sum to 100 percent. Figure includes categories reported by at least 10 percent of survey respondents (enrollment-weighted sample). Omitted categories are (1) students who are enrolled part-time (5.6 percent), (2) institution does not track these data (4.6 percent), (3) other group (3.9 percent), (4) students in a specific race/ethnicity category (2.8 percent), and (5) military-affiliated students (1.4 percent; Appendix Exhibit C.5).

FAA = financial aid administrator; SAP = satisfactory academic progress.

Twenty-nine percent of institutions also flagged that first-year students struggle to meet SAP requirements. In interviews, financial aid administrators noted that the transition to college may be difficult for incoming students, particularly as they adjust to college-level coursework, manage greater independence, or come from high schools that may not have fully prepared them for postsecondary academic expectations. Administrators also noted that first-year students are also more likely to withdraw from classes, which can make it more difficult for them to meet SAP requirements. At the same time, about one-third of institutions reported that they do not see a disproportionate number of students in any particular group struggle to meet SAP requirements.

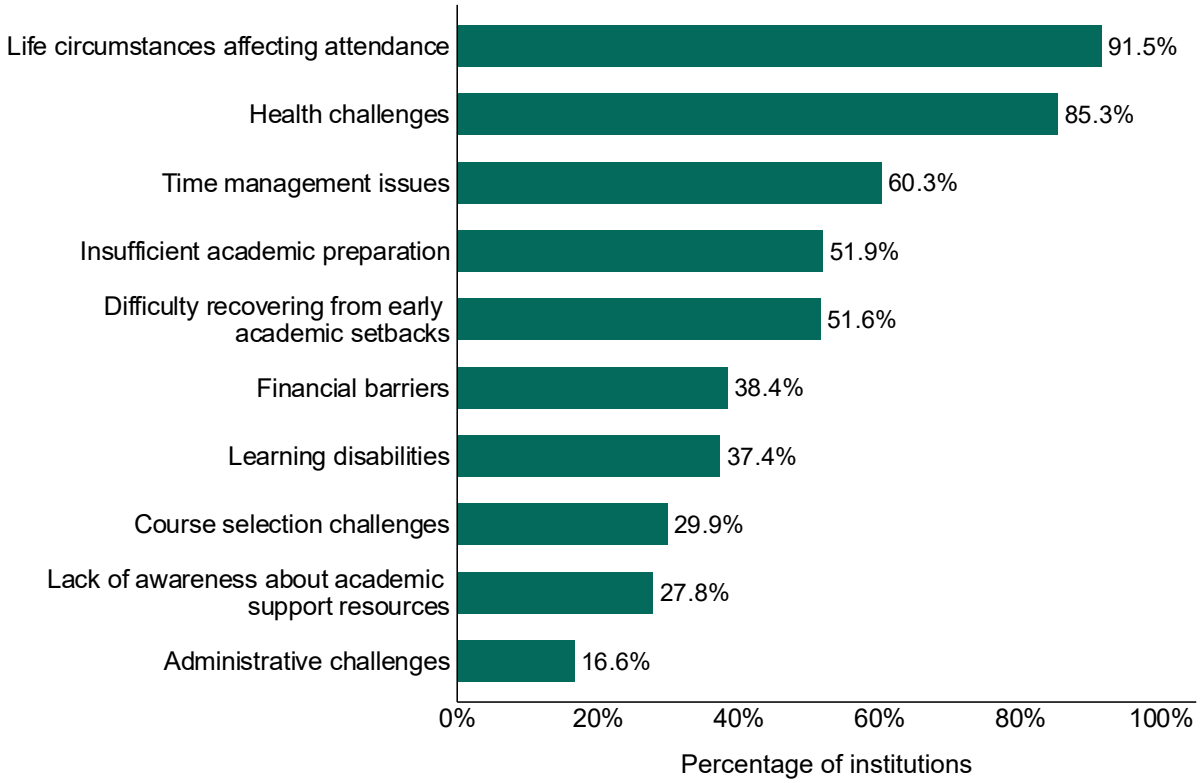
A smaller subset of respondents also identified other types of students who can struggle to meet SAP requirements in certain circumstances. In interviews, financial aid administrators described SAP challenges for adult learners, returning students, and transfer students. Students who return to school after a break in enrollment or who have accumulated transfer credits may particularly face difficulty meeting maximum time frame requirements. Staff noted that these students may have already earned credits that count

toward SAP limits, even if those credits do not apply directly to their current program of study. This can leave returning and transfer students with less remaining eligibility, despite their renewed enrollment.

Life circumstances, health challenges, and time management issues can make it difficult for students to maintain good SAP standing.

Surveyed institutions indicated that students cite major life circumstances affecting attendance (92 percent) and health challenges (85 percent) as issues that are most likely to lead them to struggle to meet SAP requirements (see Exhibit 4). Interviewees reported that these life circumstances may include work demands, financial instability, housing challenges, caregiving responsibilities, limited access to healthcare, and death or illness in the family. In interviews, financial aid administrators and students shared that physical and mental health issues also disrupt academic progress; financial aid administrators shared that they are increasingly seeing mental health issues cited in SAP appeals.

Exhibit 4. Percent of institutions reporting reasons why students struggle to meet SAP requirements (enrollment-weighted)



Source: FAA survey.

Notes: N = 219 responding institutions. Institutions can indicate multiple circumstances so percentages will not sum to 100 percent. Figure includes categories reported by at least 10 percent of survey respondents on the enrollment-weighted survey. Omitted categories are (1) difficulty understanding SAP policy components (6.1 percent) and (2) other circumstances (1.5 percent; Appendix Exhibit C.5).

FAA = financial aid administrator; SAP = satisfactory academic progress.

As might be expected, direct challenges with academic performance can also create difficulties. Over half of institutions identified time management issues (60 percent), difficulty recovering from early academic setbacks (52 percent), and insufficient academic preparation (52 percent) as reasons students struggle to meet SAP requirements. Other issues are less often a problem but may still seriously affect students in certain circumstances. Less than half of institutions indicated financial barriers (38 percent) or learning disabilities (37 percent) as reasons students struggle to meet SAP (Appendix Exhibit C.5).

Student story

A severe knee injury led one student to medically withdraw and miss midterms. The student faced limited local healthcare access and difficulty obtaining documentation the institution would accept, delaying the SAP appeal process, but the student was ultimately able to file a SAP appeal and preserve their aid eligibility.

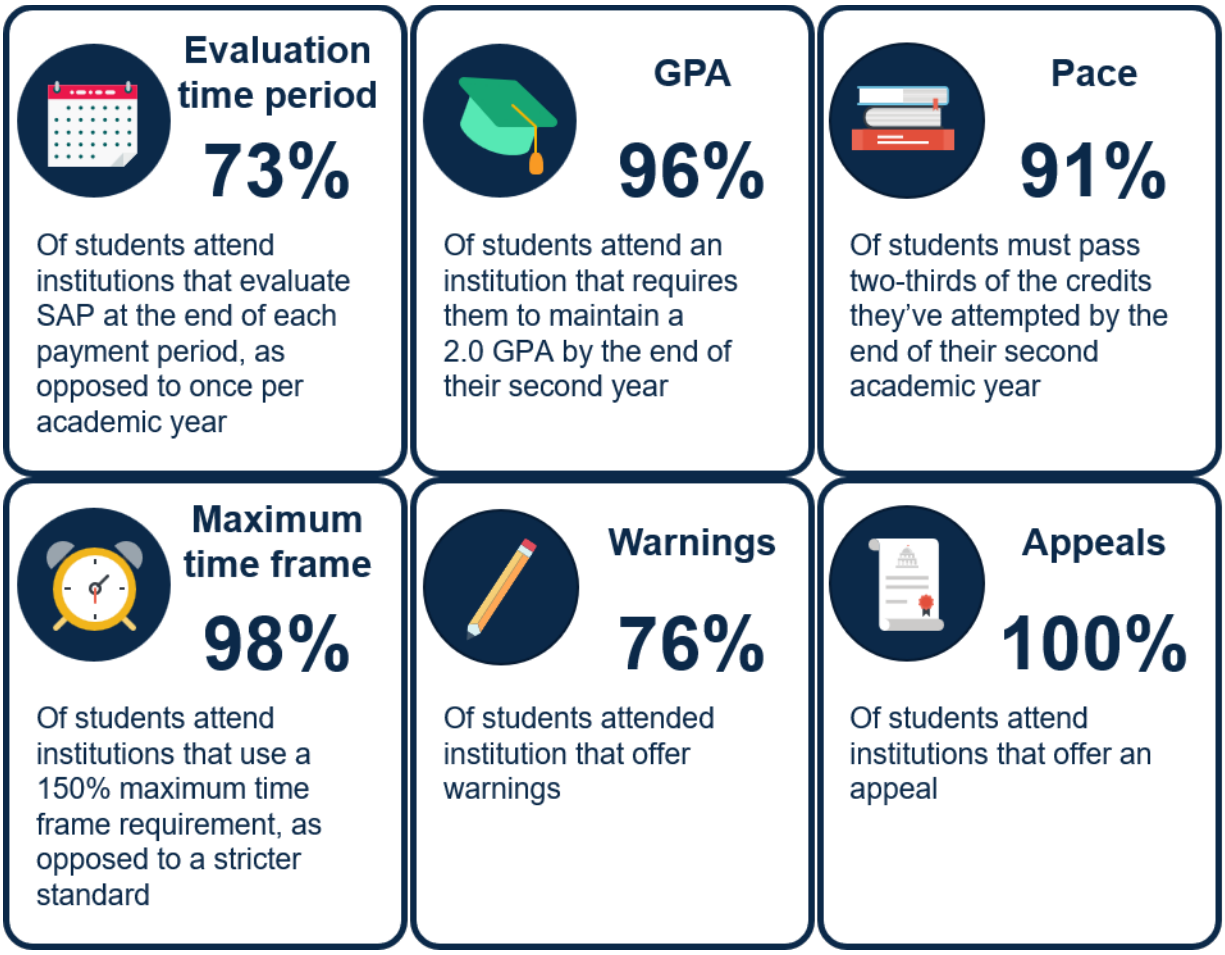
"If my appeal wasn't approved, my last resort would have been to join the [Army] Reserves. I'm a first-generation student and the oldest of 13; I would have had no other way to pay for school without financial aid."

Student

Which SAP policies and procedures do students experience?

Even though federal regulations allow for important types of flexibility in SAP policies, most students experience a standard set of SAP policies that align with examples provided in federal guidelines. Specifically, most students are evaluated by payment period (for example, at the end of each term), have a 2.0 GPA requirement at the end of the second academic year, a 67 percent course completion rate (pace of progress), and a 150 percent maximum time frame measured in credit or clock hours. In addition, all students in the study sample have the option to file a SAP appeal, and three-quarters (76 percent) attend an institution that offers a warning period (Exhibit 5).

Exhibit 5. Common SAP policies students experience



Source: Website review, FAA survey.

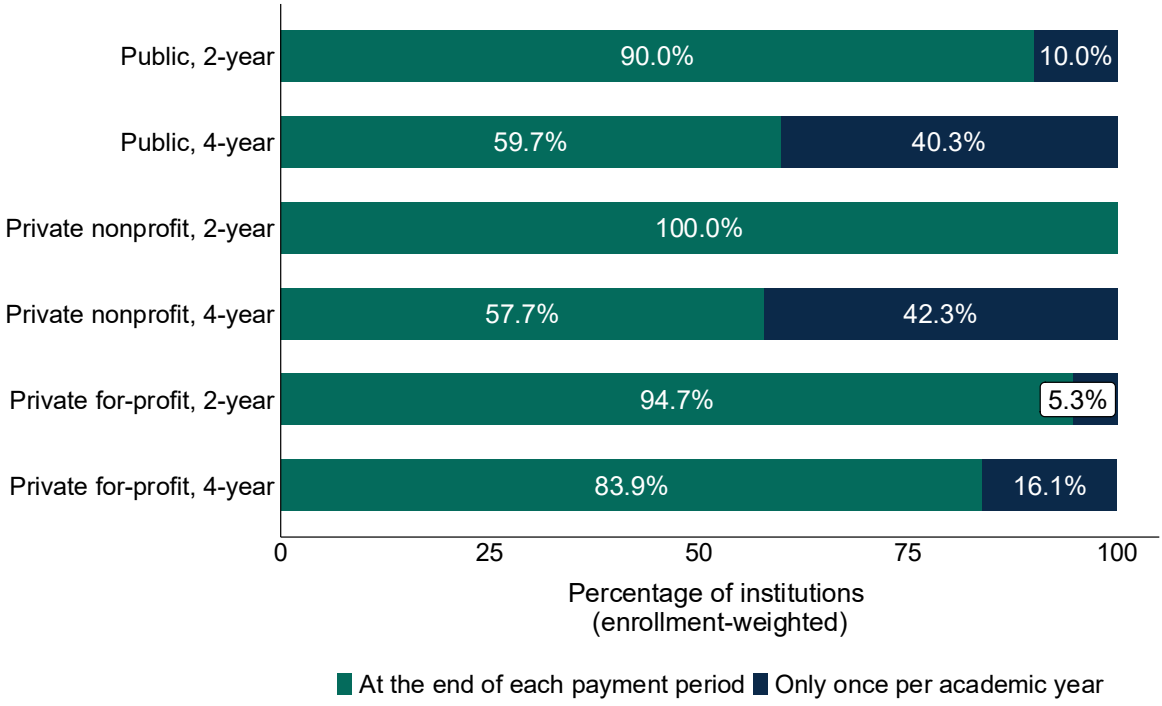
Notes: Evaluation time period, GPA, pace, and maximum time frame data are based on a review of 1,197 institutional websites and reflect the 2025–26 academic year or the most recent information available online. The study team was unable to locate information on evaluation time period and GPA from one institution; information on pace from 9 institutions; and information on maximum time frame from 12 institutions. For the GPA requirement, 5 institutions did not use a GPA requirement. The percentage of students attending an institution that offers a warning is based on responses from 194 FAA from an enrollment-weighted sample with weights to account for nonresponse. Similarly, the percentage of students attending an institution that offers appeals is based on responses from 220 FAA from an enrollment-weighted sample with weights to account for nonresponse.

FAA = financial aid administrator; GPA = grade point average; SAP = satisfactory academic progress.

Although most students experience a very similar set of SAP policies, some institutions use flexibility in federal legislation to make requirements more strict or more lenient.

The vast majority of students at 2-year institutions and three-fifths of students at 4-year institutions receive SAP evaluations at the end of each payment period, which may be more lenient than the alternative of evaluating SAP once per academic year. Nine out of 10 students enrolled at 2-year institutions experience SAP evaluations at the end of each payment period, compared to six out of 10 students at 4-year institutions (Exhibit 6). Among 4-year institutions, private for-profit institutions were an exception: 84 percent of students at these institutions are evaluated at the end of each term. Students at more selective 4-year institutions are less likely to experience SAP evaluations at the end of each payment period than those at inclusive 4-year institutions (64 percent versus 50 percent, respectively; Appendix Exhibit C.6). Generally speaking, evaluating students by each payment period rather than academic year is seen to be more lenient because it offers students more opportunities to monitor and maintain their financial aid eligibility, especially if institutions offer a warning period before students need to file an appeal (John Burton Advocates for Youth 2021).[17]

Exhibit 6. SAP evaluation period, by sector



Source: Website review.
Notes: N = 1,196 institutions based on 2025–26 academic year or most recently available information online. Percentages reflect student-weighted percentages. One institution was excluded from the sample because information on its SAP policy could not be located. Percentages may not sum to 100 percent due to rounding.
SAP = satisfactory academic progress.

[17] However, at institutions with shorter terms (trimesters or quarters), there is a tradeoff involved with term-based evaluations: conducting SAP evaluations more than twice per year could raise the risk of a failed evaluation and is more burdensome for institutions to administer. In other words, evaluating SAP less often provides students a longer window to academically recover on their own.



Most students do not have access to lenient GPA requirements (a standard less than 2.0 in earlier terms), though leniency is more common at for-profit institutions. Very few students (4 percent) attend an institution that sets a standard lower than 2.0 by the end of the second year.[18,19] However, among 4-year institutions, private for-profit institutions are far more likely to use a GPA standard that is lower than a 2.0 (affecting 23 percent of students at these institutions) by the end of the second academic year compared to private nonprofit institutions (affecting 10 percent of students at these institutions) or public institutions (affecting 3 percent of students at these institutions). Across both 2- and 4-year institutions, almost no students (less than 1 percent) attend an institution that requires a GPA higher than a 2.0 by the end of their second year (Appendix Exhibit C.7).

Similarly, only one in four students (26 percent) experience a laddered GPA standard, where institutions set lower GPA requirements in a student's initial terms compared to later terms (Exhibit 7). This is most common among private for-profit institutions where nearly half (46 percent) of students experience laddering, and private nonprofit institutions where 37 percent of students experience laddering.[20] Public institutions use this option at a lower rate: only 22 percent of students in these institutions experience laddering within the first two academic years (Appendix Exhibit C.8).[21]

Challenge: Financial aid administrators and other staff share that first-year students are one of the groups where they see the most struggles with SAP. This is likely due to difficulties adjusting to a shift in academic rigor, challenges with deciding on an academic path, or general readiness for college. This can have implications for all SAP components, but particularly GPA and pace requirements.

Consideration for institutions: Laddering GPA and pace-of-progress requirements allow students time to adjust to their program (John Burton Advocates for Youth 2021) and can help account for the academic challenges students may face earlier during that transition. However, it is worth noting that in our interviews, financial aid administrators noted mixed experiences with a laddered GPA requirement. One financial aid administrator at a public 4-year institution, which uses a 1.50–2.0 laddered GPA requirement, noted that they tend towards more lenient policies to make sure they are student friendly. Another financial aid administrator at a private nonprofit 4-year institution shared that they decided to move away from a laddered GPA requirement because they found that students who fell behind early struggled to catch up over time.

[18] The GPA standard requires a C equivalent, commonly understood as a 2.0 on a 4.0 scale, by the end of two academic years. However, there is also a provision in the legislation that allows for institutions to instead evaluate students on academic standing in a manner that is consistent with the institution's graduation requirements. Some institutions may consider students to be on track to meet graduation requirements even if they do not have a 2.0 by the end of their second academic year and have some other mechanism in place to make sure students eventually scale up their GPA in their remaining time.

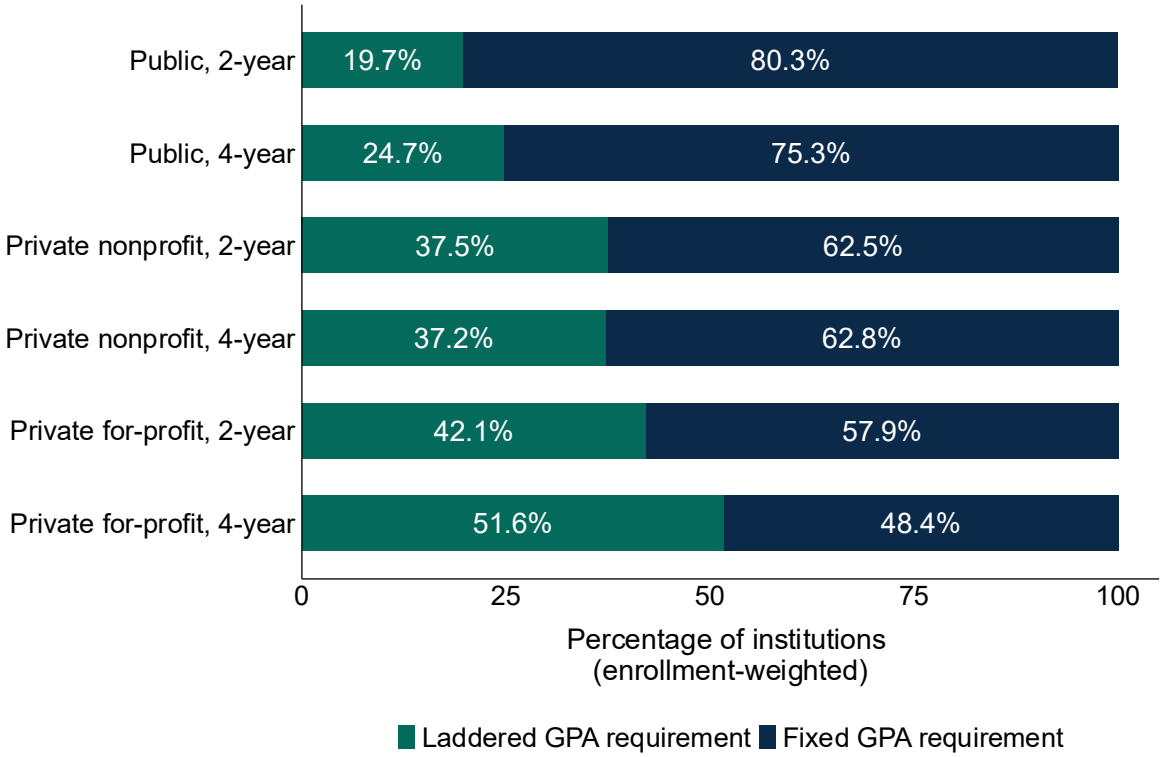
[19] Term-based GPAs, which require students to meet the GPA standard for the prior term in addition to meeting the standard cumulatively, are rare. Only about 1 percent of students are enrolled at institutions with a term-based GPA standard in addition to a cumulative GPA standard.

[20] The detailed percentages in Exhibit 7, which are reported by sector, roll up into these overall percentages that are reported in the text by institution control.

[21] These patterns are consistent for students at both 2- and 4-year institutions.

Notably, when looking at subgroup characteristics, we find that students attending institutions with a high share of Pell Grant recipients[22] are also more likely to experience a laddered GPA standard (41 percent of students compared to 24 percent of students at other institutions; Appendix Exhibit C.8).

Exhibit 7. Prevalence of GPA laddering within the first two academic years, by sector



Source: Website review.

Notes: N = 1,191 institutions based on 2025–26 academic year or most recently available information online. Percentages reflect enrolled-weighted percentages. One institution was excluded from the sample because information on its SAP policy could not be located. Five institutions were excluded from the sample because they used an alternative measure to GPA.

GPA = grade point average.

More selective institutions impose stricter course completion rate requirements on their students, whereas for-profit institutions adopt more lenient policies. Nine out of 10 students are required to maintain a standard 67-percent course completion rate by the end of the second academic year to meet the pace-of-progress requirement. Six percent of students are held to a stricter course completion rate than 67-percent, whereas about 4 percent are asked to meet a standard lower than 67-percent.[23]

[22] High Pell Grant share institutions are defined as institutions where 50 percent or more of the student population is a Pell Grant recipient.

[23] Information about pace requirements could not be found for 9 institutions.

Challenge: In our interviews, financial aid administrators shared that they have a hard time figuring out which transfer credits they should count toward a student's academic program, which by extension determines which credits are counted as part of a student's SAP evaluation.

Consideration for institutions: Automation and technological support for financial aid could help identify applicable courses and streamline what is often a manual process. For example, John Burton Advocates for Youth recommends using data and automating early alerts to improve student support and communication (John Burton Advocates for Youth 2023). Another consideration for the broader field of higher education is to use common course numbering systems to track transfers consistently. These may be easier to implement at a state or system level, such as California's Common Course Numbering Project. These measures could ease the burden on staff and ensure students can drop grades from previously taken courses that do not apply to their program and might hurt their SAP evaluation, particularly for the maximum time frame requirement.

Though uncommon, more selective 4-year institutions are more likely to have stricter pace-of-progress requirements. For example, across all 4-year institutions, 8 percent of students are required to pass more than two-thirds of their attempted credits by the end of their second academic year. In contrast, 19 percent of students at more selective institutions must meet a higher standard by the end of their second academic year (Appendix Exhibit C.9).[24]

It is also unusual for students to experience a more lenient approach to the pace-of-progress requirement, although leniency is more common at private for-profit institutions. In addition to the option to ladder GPA, institutions also have the choice to ladder their pace-of-progress requirement over the course of an academic program, with lower standards in earlier years. Overall, 11 percent of all students experience a laddered pace-of-progress requirement. This is higher for students at private for-profit institutions, where 38 percent of students experience laddering. This leniency is also more prevalent at institutions with a higher share of students who are Pell Grant recipients, where 27 percent of students experience a laddered pace-of-progress requirement, compared to 8 percent at all other institutions (Appendix Exhibit C.10). This mirrors the pattern in GPA requirements, where students at private for-profit institutions and institutions with a higher share of Pell Grant recipients experience greater leniency than overall national trends.



Students are rarely evaluated using a stricter maximum time frame than federal legislation requires, apart from more selective institutions. Only 2 percent of students are required to complete their program in less than 150 percent of the time typically needed for their degree (Appendix Exhibit C.11). One exception is at more selective 4-year institutions, where 12 percent of students must complete their degrees in a shorter time frame (such as 120 percent).

Institutions can measure maximum time frame in two different ways. The stricter approach is to measure by calendar time, which would require students to be able to complete their degree within, for example, 150 percent of the typical calendar time required with full-time enrollment. For example, a student in a

[24] This pattern is similar when looking at pace requirements in the latter academic years. Institutional selectivity categories were derived from 2021 Carnegie Undergraduate Profile Classifications, as reported in IPEDS. Selective institutions are those in which admitted first-year students' test scores are in the 40th to 80th percentile of selectivity among all baccalaureate institutions. More selective institutions are those in which admitted first-year students' test scores are in the 80th to 100th percentile of selectivity among baccalaureate institutions. Institutional selectivity was reported only for 4-year institutions.

bachelor's degree program must be able to complete their program within six years from initial entry. The other option is to measure the maximum time frame by credit hours a student has attempted. This approach assesses whether a student will be able to complete their degree without attempting more than 150 percent (or a similar maximum time frame measure) of the number of credit hours required for their degree.[25] For example, if a student must complete 120 credit hours for their bachelor's degree, a maximum time frame standard of 150 percent measured in credit hours would require a student to be able to complete their degree without exceeding 180 credit hours.

Standards based on calendar time are considered a stricter requirement because they are less flexible in adjusting for students who only enrolled part-time (meaning they attempted fewer credits) for one or more terms. Only 3 percent of students nationally are evaluated based on calendar time. Using calendar time as opposed to credit hours to measure maximum time frame is most common at more selective 4-year institutions, where 18 percent of students are evaluated using calendar time (Appendix Exhibit C.12).

Challenge: Financial aid administrators noted that students who stopped out but return to school later on tend to run into maximum time frame issues. This is particularly a challenge for adult learners, who may have first enrolled straight out of high school, struggled, and then returned years later with a better sense of their goals and readiness for college.

Consideration for policymakers: Multiple financial aid administrators suggested providing a level of academic amnesty and forgiveness for students who have been out of school for multiple years so that they have a real chance to pursue their academic and employment goals. Financial aid administrators recognized that this should be limited (such as for students who have been out of school for five, 10, or more years) but felt that this could be a pivotal strategy to support adult learners in particular toward program completion.

Most institutions include developmental coursework in SAP evaluations, which may make the maximum time frame requirement more challenging for students enrolled in those courses. Institutions have flexibility in deciding which types of courses to include in the maximum time frame standard. Specifically, institutions are not required to use developmental coursework to calculate the total number of courses a student has attempted under the maximum time frame requirement. In practice, however, 64 percent of students are enrolled in institutions that do count developmental courses in SAP evaluations. This sets a higher standard for certain students to meet their SAP requirements, in cases when they must attempt and pass more courses than other students to complete a degree. This pattern varies across sectors. For most students at 2-year institutions (76 percent) and 4-year public institutions (70 percent), developmental courses are counted toward the maximum time frame calculations, compared to only 31 percent of students at 4-year private institutions (Appendix Exhibit C.13). In 2023, the state of California passed AB 789 in an effort to make student-centered reforms to financial aid in the state. One of these measures was to require that all institutions of higher education in California exclude developmental coursework from maximum time frame calculations (Taylor and Pauter 2025).

[25] For example, in a program that required 120 credits, a student would fail to meet the maximum time frame standard if they had attempted 120 credits but completed less than 60, as it would not be mathematically possible for them to complete their degree requirements in the remaining 60 credits available to them if their institution used a 150 percent maximum time frame standard (120 x 1.5 = 180 credits).



More than one-quarter of all students do not attend an institution that offers SAP warnings, a pattern driven by institutions that evaluate SAP by academic year. Institutions that evaluate SAP each academic year cannot offer students a warning term under federal regulations (as previously noted, 27 percent of students are evaluated on an annual cadence). Among the 73 percent of students who are evaluated by term, however, nearly all (95 percent) attend a program that offers students a warning period rather than immediately revoking access to aid after a student fails SAP requirements (Appendix Exhibit C.13).



Institutions exercise their discretion to shape appeals processes in varied ways, which may affect student decisions about filing an appeal and appeal outcomes. Federal legislation extends notable flexibility to institutions related to appeals. One area institutions could exercise this discretion is by defining the list of valid reasons for approving an appeal, as well as reasons they may deny one. Students are generally able to cite a wide range of justifications in their appeal. However, there is more variation how institutions define the list of valid reasons for denying a SAP appeal (Exhibit 8). For example, 25 percent of students attend an institution that automatically denies appeals that are filed after the posted deadline—a stricter approach than the alternative of extending more flexibility to consideration of late submissions (Appendix C.14).

Exhibit 8. Percent of institutions (enrollment-weighted) using certain criteria for approving or denying appeals

Reasons for approval	Reasons for denial
When institutions accept an appeal, it could be for the following reasons: • Employment issues (84 percent) • Loss of child care (82 percent) • Financial challenges (79 percent) • Interpersonal issues (79 percent) • Difficulty balancing school with other responsibilities (77 percent) • Food insecurity (77 percent) • Foster care involvement or aging out of foster care (69 percent)	When institutions deny an appeal, it is for the following reasons: • Insufficient reason for appeal (88 percent) • Missing supplemental documentation (69 percent) • Incomplete appeal forms or paperwork (60 percent) • Missed appeal deadline (25 percent) • Multiple appeals submitted with no progress (9 percent)[26] • Other (7 percent) • Appeal submitted to the wrong office or process (1 percent)

Source: Financial aid administrator survey.

Notes: N = 220 financial aid administrators for reasons to appeal. N = 219 financial aid administrators for reasons to deny an appeal. Percentages reflect enrollment-weighted percentages. The following reasons are considered valid reasons for appeal by 90 percent or more of institutions: student illness or injury, death of a relative, mental health challenges, victim of crime or domestic violence, family issues, housing instability or homelessness, disability or need for accommodations, military service or deployment, and natural disaster or emergency. See Appendix Exhibit C.14 for more details.

Although many institutions use a similar set of criteria for approving appeals, other appeals-related rules and procedures vary widely. For example, a little more than one-quarter of students (27 percent) are limited in the number of times they can receive a successful appeal (typically limited to two or three appeals in total). When it comes to a second-level review, one-third of students (34 percent) are unable to

[26] During financial aid administrator interviews, we also heard administrators discuss this stricter approach to appeals, noting that if students failed to show academic progress since their last appeal, they would be less likely to approve the appeal.

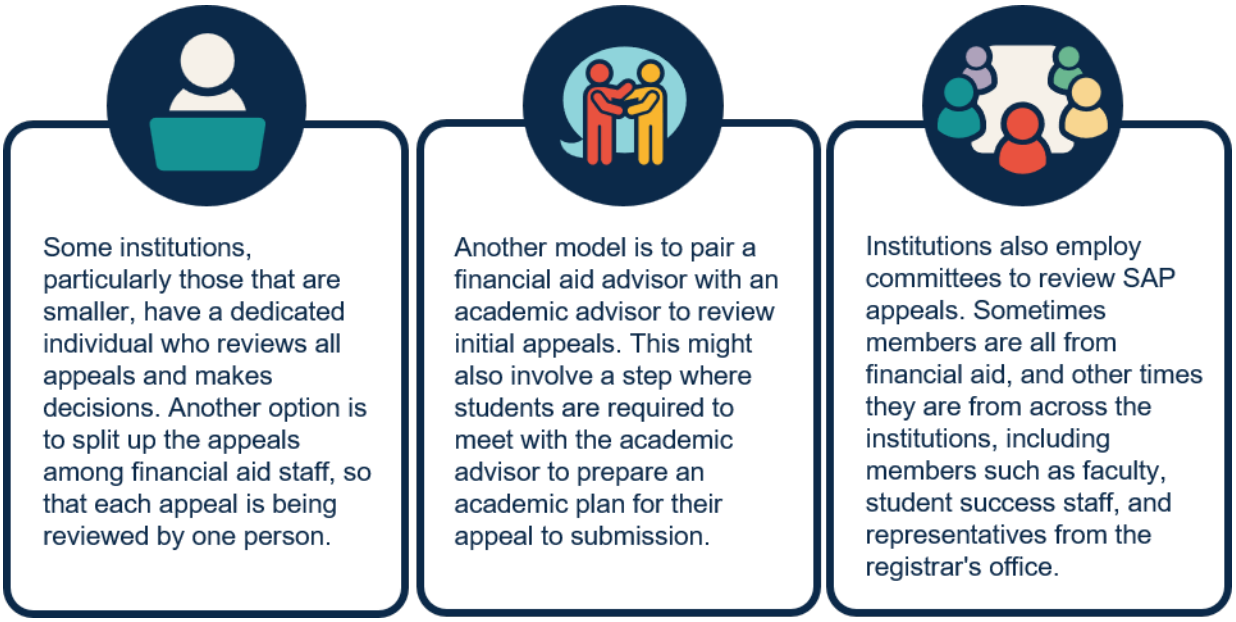
request one if their appeal is denied. In contrast, nearly half of all students have the more lenient option to receive a second-level review upon request (46 percent), and 15 percent of students are moved to a second-level review automatically if their initial application was rejected (Appendix Exhibit C.15).

Similarly, some institutions take advantage of the option to use more lenient and flexible time frames and deadlines for appeals. The majority of students (68 percent) are not limited to a specific time frame to submit their appeal (Appendix Exhibit C.15). However, there are important tradeoffs with this approach, and it is not clear whether this option is always helpful to students. On the one hand, a flexible timeline appears more lenient, as it provides students with substantially more time to prepare a strong appeal and complete necessary paperwork.[27] On the other hand, being too flexible about appeal timelines may remove a useful form of time pressure that helps students to file an appeal before the next term's billing due date. For example, if an institution does not complete appeal determinations before a payment is due, students would have to pay tuition out-of-pocket while waiting to see if their appeal is approved. In interviews, several students who experienced an open-ended appeal process shared that they needed to pay out-of-pocket for the new term while waiting to receive a decision on their appeal, which created major financial stressors that impacted their academic performance.

Beyond the reasons they consider within the scope of an appeal, institutions involve a variety of different entities in the appeals process (Exhibit 9). In our interviews with financial aid administrators, we learned that some institutions use a combination of approaches, such as starting with an individual or smaller group and then escalating more complex or second-review appeals to a larger or different committee. There are tradeoffs for each model, which have implications for students. For example, individual reviews could provide students with faster results but may be more subject to error or bias, whereas reviews involving multiple individuals or departments could support more holistic decision making while requiring additional time for coordination.

[27] One financial aid administrator noted that for the 2025–26 academic year their office shifted away from term-specific deadlines, specifically with the intent to allow more time for students to submit documentation.

Exhibit 9. Review structures for SAP appeals



Source: Financial aid administrator interviews.
SAP = satisfactory academic progress.

Most students who successfully appeal are asked to complete an academic plan, and institutions make use of flexibility that allows these plans to vary widely. Academic plans, which students may be asked to complete or follow after a successful appeal, can provide an opportunity for students to remain on probation status for multiple payment periods even while failing to meet SAP, as long as they are on track with their plan. Similar to appeals, federal legislation offers limited guidance related to academic plans, leaving institutions a lot of room to define their policies for students. More than half (61 percent) of students attend an institution that require an academic plan if they successfully appeal, whereas one-quarter (25 percent) attend an institution that requires students to complete one only if it is clear they will not be able to meet SAP by the next evaluation period (Appendix Exhibit C.16). In interviews, some financial aid administrators noted that academic plans can be as simple as committing to passing all courses applicable to a student's program with a minimum grade of a C, while others require students to commit to tailored plans, often decided in partnership with academic advising.

As mentioned, some of the most common reasons students struggle to meet SAP requirements are life circumstances affecting attendance (such as transportation, child care, or caregiving responsibilities), health challenges, or time management issues. Developing and monitoring appropriate and individualized academic plans could provide students with clear goals to stay on track academically while accounting for their other needs. That said, these require time and attention from financial aid and academic staff. Programs with staffing and resource constraints may need to consider using standardized academic plans (for example, requiring all students to pass with at least a C in all classes in a given term) or defaulting to a longer probationary term (for example, structuring an academic plan for two terms instead of one) to account for staff capacity.

Institutions use the flexibility in SAP regulations to help meet a variety of competing institutional goals.

In interviews, financial aid administrators described a range of different goals and needs that influence how institutions design their SAP policies within the flexibility provided by federal legislation (Exhibit 10). These include balancing student success, operational considerations, and academic standards. One financial aid administrator noted that the flexibility in federal legislation allows their school to use a laddered GPA requirement, which helps account for difficulties in early terms, and others similarly mentioned flexibility allows their financial aid practices to align with broader institutional goals around student success and removing barriers to degree completion. Some administrators highlighted how much work it can take to implement student-centered SAP policies, such as proactively reviewing transfer credits and re-calculating maximum time frames for all students rather than just for those who are in violation. A few institutions also mentioned a desire to confirm and align their approaches with peer institutions, which might lead to stricter policies or a decreased likelihood of opting to shift policies to be more lenient for students. Notably, some institutions mentioned prioritizing high academic standards, which can work contrary to maximizing the number of students who remain eligible for financial aid. This aligns to patterns we mention above, with more selective 4-year institutions tending to opt for stricter SAP policies.

Exhibit 10. SAP policy decisions can reflect competing institutional goals



Source: Financial aid administrator interviews.

GPA = grade point average; SAP = satisfactory academic progress.

What supports and structures are available to help students with SAP?

Institutions make a wide range of choices about how to deliver SAP-related information, whether to deliver specialized supports to students who may be at risk of failing SAP requirements, and how to help students after they have failed one or more SAP requirements. Although little is currently known about the relationship between each of these choices and students' long-run academic success, it is likely that these decisions can play an important role in shaping students' ability to navigate SAP rules and procedures and ultimately maintain federal financial aid.

Communicating SAP eligibility requirements and status updates effectively to students is an area for growth for financial aid administrators and support staff.

Recent research has highlighted how students, particularly those from low-income backgrounds, may lack a full understanding of their financial aid award, underscoring how important it is for institutions to provide accessible and understandable information about financial aid (Diehl and Ocean 2025). Clear and accurate communication about SAP eligibility requirements helps students to make informed decisions about course enrollment and persistence, credit loads, and academic planning that can affect their continued eligibility for financial aid. Timely communications detailing SAP eligibility and academic standing can enable students to identify risks and seek support before losing their aid. Survey and interview data provided detail on the timing and tone of communications regarding SAP, which communication channels institutions use, and which communication best practices may help students to remain SAP eligible.

Balancing the tone of SAP communications



Respondents at several schools noted the importance of tone in communications regarding SAP. One financial aid administrator described the importance of **balancing urgency and encouragement in communications** with students.

They noted that students often perceive SAP communications as punitive rather than supportive and that **changing the tone of communication to be more student friendly might encourage more engagement** with SAP communications and with financial aid staff. This staff member noted that their institution's "communications are more formal in nature" and that "maybe students would be less intimidated to ask questions or submit an appeal if it was more informal."

Staff at one institution described their process for making SAP communications understandable to students, which involves **asking a student to review external communications** about financial aid prior to posting materials on the school's website. Another financial aid administrator mentioned that their office intentionally reviewed their communications to provide detailed but non-alarming messaging, **aiming to "minimize panic" among students.**

Institutions use a variety of methods to share general information about SAP requirements before the start of a new term. The vast majority of students (97 percent) attend institutions that share general information on SAP requirements near the beginning of the term or earlier, such as at admission or enrollment (37 percent), during orientation (62 percent), at the start of the term (21 percent), or when students are notified of their Title IV financial aid eligibility (77 percent; Appendix Exhibit C.17). Several interview respondents mentioned giving presentations on SAP during freshman seminars or other first-year orientations. Some institutions may even provide information about SAP to high schoolers or

incoming students, with a handful of interview respondents noting that they conduct presentations at high schools to educate students early about financial aid and SAP.

Two-thirds of students attend institutions that notify students that they are at risk of failing to meet one or more SAP requirements after a SAP evaluation. Although institutions are required to notify students that they have failed to meet SAP requirements following an evaluation, they are not required to proactively reach out to students who are *at risk* of failing in a future SAP evaluation. Students attending 2-year institutions are more likely (76 percent) to receive notifications that they are at risk, compared with students at 4-year private (56 percent) and 4-year public (67 percent) institutions (Appendix Exhibit C.17).

Most institutions use websites and email as the primary way to communicate SAP information to students, but these channels have significant limitations. Institutions in the study's enrollment-weighted survey indicated school websites (94 percent) and email communication (85 percent) as the two most common forms of communication used by their financial aid office to share information about SAP (Appendix Exhibit C.17), a finding supported in our staff and student interviews. Nearly all students interviewed shared they learned about SAP on their school's website, but opinions varied on the usefulness and accessibility of those websites. As part of this study's data collection process (across 1,200 institutions), coding of financial aid websites revealed that SAP information is sometimes not locatable through a Google search and requires manual navigation of complex sub-menus or a downloadable handbook. Some institutions also provided conflicting information across sources, such as the financial aid website, college handbook, or an embedded PDF. Others did have a web page about SAP but did not clearly outline all required components (for example, omitted information about the maximum time frame requirement). In a few rare cases, we were unable to locate any information about SAP requirements online.

Nearly all interview respondents noted that email is the primary form of communication between financial aid offices and students, but most respondents felt that it was ineffective. Financial aid administrators described using email to communicate SAP warnings, send notices of probation or suspension of financial aid, provide instructions on how to appeal and the necessary documentation, and provide instructions for developing an individualized academic plan. However, most of the staff interviewed reported that students do not read their email or respond to email communications from financial aid offices.

In addition, in interviews, several financial aid administrators reported difficulties reaching students by phone. To mitigate these communication issues, respondents from several schools noted that they find face-to-face communication to be far more effective in both providing information about SAP that students will understand and gaining a better understanding of a student's particular academic circumstances. A limited number of respondents noted that their institution communicates through student portals, including automated holds on student registration, after a failure to meet SAP requirements or a loss of financial aid eligibility. Several students described these automated communications as the first time they became aware of their SAP status and felt that a different or more proactive form of communication would have better prepared them to deal with appeals or academic planning to regain eligibility.

Multi-modal and individualized communication strategies may improve student understanding and awareness. Across students and staff, mixed or multi-modal communication strategies appeared to be most effective in reaching students, as email communication alone appeared to be insufficient. Financial aid administrators offered examples of calling or texting students in addition to email, sending physical letters to students or their parents, social media campaigns with information on financial aid, and in-person financial aid workshops. Although staff were uncertain of the effectiveness of any one of these methods, they emphasized the importance of offering many communication channels to students.

Staff and students agreed that personal relationships were key to communicating about SAP. Financial aid and academic advising staff noted that individualized conversations with students improved student understanding of SAP policies and adherence to the steps they needed to take to regain or maintain eligibility. Although only a few of the students in our interview sample noted that they engaged with financial aid staff prior to SAP warnings or failure, most students interviewed reported financial aid staff as their primary point of contact for SAP-related questions after failing SAP requirements. Students largely characterized these communications as positive, praising staff responsiveness, prompt communication and turnaround times for appeals, and clear explanations of SAP policies and eligibility requirements. Several students highlighted the importance of feeling like they had a dedicated point of contact if they had questions, as well as developing a personal connection with a staff member who could understand their circumstances.

Challenge: Most students interviewed expressed email fatigue due to the large volume of other email communications they receive from their school, and most staff interviewed felt that students may not read emails from financial aid offices.

Many financial aid staff noted in interviews that even when students do engage with communications regarding SAP, they find SAP policies to be confusing, particularly around pace calculations, maximum time frame rules, and appeal requirements. Staff noted that financial aid in general is confusing and complex and that **SAP may be inherently difficult to explain due to students' lack of familiarity with or understanding of financial aid**. Other areas of confusion noted by staff included general SAP terminology, consequences of withdrawing from courses, and differences between academic requirements and financial aid requirements (as detailed above).

Consideration: Students and staff interviewed agreed that proactive outreach and providing information on SAP early could help mitigate communication barriers. Several students recommended mandatory financial aid seminars or special SAP orientation sessions for first-year students. Some schools have already begun implementing strategies for proactive outreach, with one financial aid administrator describing a recent pilot program where financial aid staff would counsel first-time students on SAP eligibility after receiving a warning. Several students and financial aid administrators also described the value of early-warning communications through student portals or tailored outreach from financial aid office staff.

These findings align with research on other forms of financial aid communication, which have suggested that timely and personalized nudges can help students complete financial aid administrative requirements, such as Free Application for Federal Student Aid (FAFSA) filing. A randomized evaluation of the impact of application assistance and information on FAFSA submission found that support on FAFSA applications plus personalized information had increased effects on FAFSA submission and Pell Grant receipt when compared to providing information alone (Bettinger et al. 2012). Similarly, an experiment on personalized SMS-text reminders found that students who received text notifications were more likely to submit and complete their FAFSA application during the intervention period (Page et al. 2020). However, small nudges alone may not be sufficient in some circumstances: a large study of FAFSA completion

campaigns found that nudges alone had smaller impacts but may be more effective when tailored to student needs and paired with opportunities for individual advising (Bird et al. 2019). Financial aid offices would likely benefit from applying these lessons to their SAP communication and outreach plans, especially when their communication and outreach strategy is paired with other student supports.

Academic advising is a key support for students who have failed SAP, but the intensity of offered supports and student engagement with services vary widely.

In addition to adopting varied SAP policies and procedures, institutions may also choose to offer a range of supports to help students maintain academic standing, navigate SAP warning and appeals procedures, and sustain their aid eligibility.

Most institutions provide a form of academic advising to help students meet SAP requirements. Among institutions that notify students they are at risk of failing to meet SAP requirements (68 percent), four out five programs refer at-risk students to advisory supports (Appendix Exhibit C.18). In interviews, most financial aid staff highlighted this academic advising support as critical for helping students avoid failing SAP or regaining financial aid eligibility.

Self-service options to monitor academic progress



Several students and staff mentioned online tools and resources for academic progress monitoring as a key support in regaining or maintaining financial aid eligibility.

- One institution offers a **SAP standing calculator** on its financial aid web page that allows students to estimate their own eligibility and progress.
- An adult learner at a 4-year institution cited the school's **degree progress tracker** as helpful in understanding the course loads needed to avoid maximum time frame barriers.
- Several schools (and one student) noted the importance of **academic credit monitoring tools in realistic academic planning** to avoid taking heavy courseloads that could result in students needing to withdraw from courses.

Some institutions devote substantial resources to more intensive, high-touch advisory support models. Examples offered by financial aid administrators and academic advising staff included required academic advising meetings, peer tutoring, and general success coaching that emphasizes wraparound supports. Although not explicitly noted by interviewees, this level of high-touch support bears similarities to Accelerated Study in Associate Programs (ASAP) interventions, which aim to remove barriers for students in associates degree programs. Although ASAP interventions are more focused on holistic student success than financial aid eligibility, the provision of wraparound supports included in the model have been shown to improve credit attainment (Sommo et al. 2018) and graduation rates (Scrivener et al. 2015).[28]

Several interview respondents noted that their institution requires students to meet with an advisor as part of the SAP appeals process, either before appeal submissions, after approval, or during a probationary term to monitor progress under an individualized academic plan. Beyond academic advising, staff mentioned several other additional academic and wraparound supports intended to address the barriers that can put students at risk of failing SAP. Additional academic supports may include peer tutoring, writing centers, disability accommodations, and success coaching. Staff also described referrals

[28] For more information about ASAP interventions, see the What Works Clearinghouse summary of evidence: https://ies.ed.gov/ncee/wwc/Intervention/1072.

to counseling and mental health services, as well as wraparound supports that address food and housing insecurity, emergency financial needs, and other challenges outside the classroom. Some institutions offer these services through programs for specific student groups, including first-generation students, students with disabilities, and students from economically disadvantaged backgrounds. One institution mentioned that they try to identify other programs for which students may be eligible to receive funding, and see if they might receive other forms of aid while they try to regain eligibility for federal aid.

However, interviews also revealed that other institutions lack the resources or staff capacity to make similar investments in advisory or wraparound supports. These institutions tend to offer lower frequency supports, such as suggested or optional meetings with an advisor or self-service degree progress trackers. For example, one academic advisor noted that large student caseloads limited their ability to meet with students in their caseload more than once per term. As a result, they described relying on students to request meetings as needed.

Students who need to submit a SAP appeal depend heavily on advice from financial aid office staff and written resources. Most students attend an institution that offers one-on-one meetings with a financial aid advisor (85 percent) or an academic advisor (75 percent) when they need to file an appeal upon failing to meet SAP. Students also frequently receive procedural guidance, such as a list of circumstances the institution would consider valid for approving an appeal (75 percent) and a list of required documentation to support the appeal (75 percent; Appendix Exhibit C.18).

Financial aid and academic advising staff echoed this finding in interviews, describing financial aid staff as central to supporting students during the appeals process and academic advisors as a key support after an appeal is approved. Staff noted that financial aid staff are typically responsible for explaining to students why they failed SAP, walking them through the appeal requirements (including necessary documentation), communicating appeal decisions, and then coordinating with academic advisors and other offices following an appeal decision. Although academic advisors are not typically involved with preparing an appeal, they are often the main support for developing and monitoring academic plans after a successful SAP appeal. Academic advisors

How coordinated supports helped one student regain momentum

A financial aid administrator described a student with foster care experience who returned to school after stopping out and later failed SAP. The student was motivated and described by faculty as bright, but she struggled to keep pace with coursework and did not know which supports were available.

What helped

- A financial aid administrator served as a trusted connector and identified supports the student did not know existed.
- The financial aid administrator connected the student to disability services, residence life staff for physical accommodations, and the campus well-being center.
- Instead of a general referral, the student left with a key person in each support area and returned for regular check-ins.

The student recovered academically, continued regular check-ins, and became an advocate for foster youth on campus and in state grant programs.

"She completely turned it around… she is on track to graduate."

Financial aid administrator

often detail and explain needed GPA targets, completion rate expectations, course enrollment recommendations, and other course requirements students may need to regain their federal aid eligibility while maintaining progress toward their degree.

That said, institutions varied in the intensity of supports available to students during probationary periods when on an academic recovery plan. Some academic advising staff described more proactive check-ins with students, midterm progress reviews, and compliance monitoring. However, staff at other institutions noted that supports following an appeal are available but only used on an opt-in basis when students seek them out. Interviewees from these institutions reported that staff time and resource constraints make it impossible to proactively monitor every student who has failed SAP requirements and is on an academic plan.

Students identified gaps in the supports available to them after failing to meet SAP and noted more personalized advising as a potential solution. Some students identified clear examples of how these supports can help preserve aid eligibility, both during and after appeals processes. Some students described the appeals process as simple and straightforward, saying they could find the information they needed online without substantial help from financial aid or advising staff. Others said the available supports were helpful in obtaining approval of their appeal. These students cited prompt communication from financial aid offices, communication with financial aid staff, and meetings with academic advisors or success coaches as key supports. Two students highlighted the importance of their success coaches, who walked them "through every step in the process" and, in some cases wrote letters of support to the appeal committee.

> "I feel like a lot of times it was me figuring out how to navigate the SAP process on my own."
>
> Student

Several students noted the benefits of working with financial aid advisors during or after the appeals process. This included financial aid staff helping students to understand SAP eligibility or eligibility decisions, preparing for or completing the appeals process, or checking in on progress during a warning period. Multiple students also noted the benefits of working with a federal TRIO program (Student Support Services), explaining that the program helped them secure disability accommodations and provided an extra advisor who regularly monitored their academic progress.[29]

> "Details of an appeal can be misconstrued if you're only communicating over email, and it can be discouraging. Having the option of appealing in-person might make the committee more understanding."
>
> Student

These students also recommended more support prior to and throughout the appeals process, such as earlier or more frequent communication about SAP eligibility, clearer instructions on required documentation, and opportunities to meet with financial aid staff in person to discuss the appeals process. Several students noted that they did not take advantage of available supports until after they had

[29] The TRIO SSS program provides services to students from low-income backgrounds, first-generation college students, and students with disabilities. For more information, see https://www.ed.gov/grants-and-programs/grants-higher-education/trio-home-page.

already failed SAP and were connected to an academic advisor to develop an individual academic plan. They recommended more proactive and high-touch counseling or advising, including multiple touchpoints with advisors throughout the term. These recommendations aligned with sentiments expressed by many financial aid and academic advising staff, who noted that more frequent engagement with academic advising was associated with student success and continued eligibility among students at risk of or failing SAP.

Students need strong coordination between financial aid and academic staff to obtain accurate SAP guidance.

Coordination between financial aid offices and other academic offices and staff is critical to ensuring that information about SAP is communicated consistently and accurately. Across interviews, financial aid staff described several practices that support effective coordination, including data sharing, shared participation in appeals processes, and close relationships between financial aid and academic offices. However, respondents also identified clear challenges to disseminating accurate SAP information and guidance, largely due to inconsistent information sharing, lack of understanding of SAP policies, and difficulties engaging nonfinancial aid staff in SAP education efforts.

Collaboration between financial aid offices and academic offices is key to proactive communication during academic progress monitoring. Although financial aid offices are responsible for SAP evaluations and notifying students of their eligibility status, 81 percent of students attend institutions where the financial aid office does not help to monitor students' academic performance outside of their regular SAP evaluation schedule (Appendix Exhibit C.18). As a result, responsibility for communicating early warnings to students about their academic standing—which may have consequences for SAP eligibility—may fall to academic advising staff. This was largely confirmed in our staff interviews, with most financial aid administrators noting that they do not provide additional academic progress monitoring or notification. Due to the challenges of communicating with students detailed above, close collaboration between financial aid offices who evaluate SAP and academic advisors who monitor academic progress is key to ensuring that students receive the information needed to maintain or improve their academic standing and preserve their financial aid eligibility.

Integrated data sharing may mitigate SAP coordination difficulties



Financial aid administrators and academic advising staff at a few schools noted that integrated data sharing systems across offices may contribute to better coordination on SAP communication and intervention. One financial aid administrator described an **integrated system that allowed academic advisors to share alerts, academic plans, and notes on progress with financial aid staff**. They noted this as both a strong support for students to help better coordinate supports and resources, as well as to streamline coordination between academic advising and financial aid staff, particularly regarding appeals.

Conversely, another financial aid administrator noted that **resource constraints at their smaller institution meant reliance on more manual forms of data entry** and sharing and less information technology support available to assist with data integration efforts. They noted that this may contribute to coordination difficulties due to time-consuming data entry and review.

Many of the financial aid and academic advising staff interviewed described strong relationships and collaboration with other offices and staff within their institutions, noting the importance of bridging the gap between academic progress monitoring and SAP evaluation. In addition, due to the administrative structure of many schools, financial aid offices share staff or leadership structures with registrar or bursar offices, and several staff cited close relationships with these offices as a result. Some of these staff may actively collaborate in the SAP review and appeals process, including review committees that feature members from registrars' offices, admissions offices, and other academic offices.

Without a strong understanding of SAP requirements, academic advisors and staff may unintentionally create confusion that can put students' aid eligibility at risk. Across interviews, student confusion and miscommunication of SAP outside of financial aid offices emerged as key challenges, largely due to misalignment between SAP requirements and more general norms about academic performance. These challenges point to the need for better coordination between financial aid and academic offices.

Students feel pressure to maintain a strong GPA—and academic advisors universally promote GPA progress among students—because GPA is the primary criterion used to determine academic standing. Since academic probation policies differ from SAP requirements, this may result in students taking actions, sometimes based on guidance from an academic advisor or other staff, to protect their GPA without considering the consequences to their degree progress or aid eligibility. For example, after failing a midterm exam, a student may consider withdrawing from the course to maintain a strong GPA, but the withdrawal could cause the student to fail SAP due to pace-of-progress or maximum time frame requirements.

Many respondents attributed these types of difficulties to siloed information sharing or lack of understanding about SAP. Financial aid staff described information silos, where financial aid offices, academic advising offices, and faculty operated with limited communication among them, particularly regarding SAP requirements and student eligibility. This lack of information sharing resulted in students receiving inconsistent information or referrals depending on who they contacted for assistance. Financial aid staff noted that SAP policies can be difficult for those outside of financial aid offices to understand given that SAP requirements can differ from the requirements related to academic standing. In addition, a few financial aid administrators cited limited faculty participation in SAP education sessions (facilitated by financial aid staff) as a contributing factor.

Academic advisors can struggle to deliver accurate guidance and advice in these nuanced circumstances, especially if they lack a more detailed understanding of SAP rules. Some financial aid staff noted that this issue may be more pronounced among faculty, who may advise individual students based on their performance in a course but who may also lack detailed understanding of both academic standing and SAP eligibility criteria. Several financial aid administrators reported challenges engaging faculty and academic advising staff in SAP trainings and information sessions, suggesting that low staff engagement with SAP communication may deepen coordination challenges.

Several strategies and practices can reduce cross-functional coordination barriers.

In talking to both financial aid administrators and academic advising staff, several approaches emerged as potentially effective for mitigating the barriers to cross-functional coordination on SAP implementation.

Promoting clarity on differences between academic and financial aid standing. A financial aid administrator at one 4-year institution suggested making clearer distinctions between academic probation (which is often designed to warn at-risk students who have not yet failed SAP requirements) and financial aid probation (which occurs after failing SAP requirements) to reduce confusion among students and staff, particularly regarding shared terminology between the two processes. Another respondent noted that "in every [financial aid] position I've held, students have always been confused by the difference in academic probation and SAP," and that students may receive inaccurate information by word of mouth regarding their warning or probation status. To alleviate these challenges, some staff recommended coordinated messaging across financial aid and academic advising offices, simplified explanations of SAP terminology (both on school websites and during in-person communications), and targeted outreach by academic advising staff to students whose academic progress may jeopardize their SAP eligibility.

Recent legislation has increased risks to aid eligibility associated with course withdrawals



The recent passage of the One Big Beautiful Bill Act will result in significant changes to federal regulations on student financial aid. One crucial change set to begin in the 2026–27 aid year is **loan adjustments for students with less than full-time enrollment**. This new regulation tasks schools with prorating annual loan amounts in proportion to the percent of full-time status the student is enrolled (NASFAA 2026). Given the difficulties described above regarding students' understanding of how course withdrawals impact their SAP standing, **this could make course withdrawals even more costly by reducing the total aid amount students receive each year**. This also underscores the importance of close coordination between financial aid and other academic offices to proactively share guidance on the changes to regulations and their implications for students' scheduling and enrollment decisions.

Source: National Association of Student Financial Aid Administrators. *Federal Student Aid Changes from the One Big Beautiful Bill Act*. NASFAA, June 2026.

Facilitating proactive communication between financial aid and academic staff to reduce the risk of incorrect information. To address the challenges posed by students receiving inaccurate or incomplete information about SAP, some staff recommended more proactive communication and training for academic staff and faculty. Some existing efforts described by staff included annual financial aid trainings for faculty members, information sessions and presentations to other academic offices on SAP requirements, and cross-functional meetings with question-and-answer sessions with financial aid staff. Many of the financial aid administrators interviewed suggested that stronger or more consistent communication about SAP beyond the financial aid office could help academic advisors and faculty learn when to refer students to financial aid staff, how to talk to students about SAP, and the implications of academic decisions on financial aid eligibility.

Conclusion

This study presents the first nationally representative snapshot of the number of students failing to meet SAP requirements, the variation in SAP policies across institutions, and the supports institutions are offering to help students maintain eligibility for financial aid. We estimate that in the spring 2025 end-of-term and end-of-year SAP evaluation, more than 1.8 million students failed to meet SAP requirements. Of these students, 54 percent (970,000) lost eligibility for federal financial aid as a result.

Survey and interview data reveal many potential opportunities to help more of these students maintain access to financial aid. Most students are held to set GPA and pace-of-progress requirements, instead of a laddered requirement that offers flexibility in response to early academic difficulties students may experience. Similarly, most programs record developmental coursework in SAP evaluations, requiring students with the least academic preparation to pass a larger number of courses to keep their financial aid, relative to other students. In addition, only one-quarter of students who failed SAP in the spring 2025 end-of-term and end-of-year SAP evaluation filed an appeal, even though the large majority of appeals are successful in sustaining students' access to financial aid.

There are also important opportunities to improve SAP-related communication and supports. Strengthened communication practices could help students understand SAP policies and procedures and connect them to important sources of help when they encounter academic, health, or other personal challenges that interfere with their studies. Better coordination between financial aid offices and academic advising support staff could also help to ensure students receive consistent and accurate guidance on key decisions (such as course withdrawals) that are often critical in determining SAP outcomes.

Addressing these concerns about SAP policies, procedures, and supports has the potential to meaningfully improve persistence and graduation rates—especially among the low-income and first-generation students who are heavily dependent on financial aid and more likely to struggle with SAP. These issues are particularly salient for adult learners who have struggled to meet SAP requirements in the past, as prior SAP failures are likely to create a long-term barrier to accessing financial aid. That said, additional research is needed to understand how SAP requirements affect longer-term outcomes, including college re-enrollment, persistence, and completion. There is also a clear need for more rigorous studies on the impacts of specific SAP approaches. Some students may actually be better off losing access to aid in the short term (for example, if staying enrolled would cause them to incur excessive student loans at a time when they are not able to succeed academically). However, prior research has demonstrated that, on average, failing SAP does harm students' long-run degree completion rates (Scott-Clayton and Schudde 2020). We do not yet know which potential SAP reforms are most likely to make a difference in improving students' long-run outcomes. And even as state and federal policymakers debate future reforms to SAP regulations, institutions and their financial aid offices also have the flexibility under existing rules to pilot a wide range of initiatives that seek to improve student experiences with SAP. Broader information sharing about the reforms that work, together with a commitment to learning from experiments that test new SAP implementation approaches, represent important opportunities to help the millions of students who depend on financial aid to successfully stay enrolled and complete their degrees.

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Appendix A. Additional Details on Flexibility in SAP Policies

As mentioned throughout the report, satisfactory academic progress (SAP) guidelines in Title IV offer institutions a notable amount of flexibility in how they set and implement SAP policies, as long as they meet minimum federal requirements. This appendix describes some important forms of flexibility by SAP component for undergraduate programs.

Evaluation time period

Institutions may choose to evaluate SAP either annually, aligning with the end of a payment period, or after each payment period (that is, at the end of each term). Degree programs that are less than one year long must review SAP at the end of each payment period. Institutions that use a trimester or quarter system (rather than a semester system) and opt to review SAP after each payment period might be reviewing students more frequently within an academic year than other institutions.

GPA standard

Institutions must include a qualitative component of their SAP evaluation, which nearly all institutions measure using a grade point average (GPA) standard. (In lieu of GPAs, institutions may also evaluate students in some other way that ensures they have an academic standing consistent with graduation requirements.) For programs that are two years or longer, institutions must review students at the end of the student's second academic year, at which point students must have a minimum of a 2.0 GPA or a "C" equivalent.

Institutions may also choose between a fixed standard (for example, always requiring students to meet a 2.0 GPA requirement at each SAP evaluation) and laddered standard (for example, requiring students to meet a 1.5 GPA requirement in their first term and a 2.0 requirement by the end of their second academic year). Institutions may also hold students to stricter requirements and impose a term-based GPA standard, in addition to a cumulative standard. For example, a student might need to have earned at least a 2.0 GPA based on grades from that semester (term-based standard) as well as an overall 2.0 GPA (cumulative standard) based on all courses counted in SAP GPA calculations.

Pace-of-progress standard

Federal regulations require institutions to establish a pace-of-progress requirement for students to complete their programs within the maximum time frame (described in the following section). Similar to GPA, institutions have a choice between using a fixed standard (for example, requiring students to successfully complete two-thirds of all attempted credits at each SAP evaluation) or a laddered standard (for example, requiring students to successfully complete 50 percent of all attempted credits in the first evaluation period, followed by 67 percent by the end of the second academic year). Institutions can also impose a term-based standard (for example, requiring students to successfully complete 67 percent of attempted credits from that semester) in addition to a cumulative one (requiring students to successfully complete 67 percent of all attempted credits counted in the pace-of-progress SAP standard). Furthermore, institutions may set a higher pace-of-progress standard than the minimum of 67 percent, such as requiring students to successfully complete 75 percent of all attempted credits.

Maximum time frame standard

Institutions must require students to complete their programs within at least 150 percent of the published program length. However, they may also set a stricter standard, such as requiring students to complete their programs within 120 percent of the published program length. Institutions may measure maximum time frame by credit hours or by calendar time. When using calendar time, an institution evaluates whether students have completed the number of hours they should have completed by a given point to finish the program within the maximum time frame. For example, an institution offering a bachelor's degree and using a 150 percent maximum time frame standard might require students to complete their degree within six years of beginning their studies. This approach can be more stringent if institutions do not adjust the time frame standard for students who are full time versus part time, as it holds students to the same expected rate of progress regardless of whether they enroll full time or part time in a particular payment period.

Treatment of courses and credits

Institutions have considerable discretion in determining how to treat different types of courses and credits in SAP calculations, provided their policies comply with applicable federal requirements. Policies may specify whether remedial coursework, incompletes, withdrawals, repeated courses, and courses from a previously declared major are included in GPA calculations. Institutions may also exercise discretion in deciding whether these various courses are counted as part of attempted or completed credits, although federal regulations include some specific guidelines—for example, transfer credits that apply toward a student's current program must be included in the pace calculation as both attempted and completed hours. In this case, institutions still have additional flexibility in deciding whether credits that do not transfer into the program are included when evaluating maximum time frame. These decisions can meaningfully affect how quickly students fall out of compliance.

Appeals

Institutions are not required to offer students an opportunity to appeal the suspension of financial aid eligibility as long as students have a way to regain eligibility. In practice, all institutions in this study's sample offer an appeals process and have substantial flexibility in how they design this process. Federal regulations note situations such as the death of a relative, a student's injury or illness, or other special circumstances as valid reasons for appeal, leaving institutions to interpret and define these special circumstances. Institutions may also establish documentation requirements and additional steps, such as requiring students to meet with an academic advisor or develop an academic plan. They can set limits on the number of appeals a student may receive, identify when an appeal decision is final, and establish deadlines or time frames for submitting an appeal.

Appendix B. Data, Sample, and Methods

Overview

Mathematica used a mixed methods study design to examine how institutions of higher education (IHEs) define and implement SAP requirements and how these policies relate to student financial aid eligibility and student persistence. The study combined three primary data collection activities:

1. A systematic **website review** of publicly available SAP policies from 1,200 2- and 4-year institutions
2. A nationally representative **survey of financial aid administrators** regarding SAP implementation and administration at their institutions
3. Qualitative **interviews and focus groups** with institutional staff and students

Together, these data sources provided both nationally representative information about SAP policies and implementation practices and in-depth perspectives on how SAP requirements affect institutions and students.

Data

Website review

The study team reviewed institutions' websites describing their SAP policies to create a standardized database of undergraduate SAP policies across IHEs in the United States. We conducted website reviews for a nationally representative sample of 1,200 institutions (see the sampling section below for more details).

Protocol development. To develop the review protocol, the study team examined a small sample of institutional websites to identify key SAP policy constructs and establish coding rules. Based on this pilot review, we developed a structured coding instrument that specified the information to collect and the criteria for categorizing institutional policies.

Website review coding. Trained research staff then reviewed publicly available SAP policy materials for the 2025-26 academic year (or otherwise most recently dated information) on each sampled institution's website, including financial aid webpages, student handbooks, catalogs, and linked policy documents. They entered the information into a standardized spreadsheet.

Reviewers collected qualitative and quantitative information on SAP requirements, including the following:

- Frequency of SAP evaluations
- GPA requirements
- Pace-of-progress requirements
- Maximum time frame requirements
- Other policy features relevant to financial aid eligibility

Website reviewers participated in regular calibration discussions and consensus reviews of difficult cases. During coding, they flagged difficult or ambiguous cases for review by the study team. The study team

also conducted ongoing quality assurance reviews of each reviewer's completed cases and provided feedback as needed.

Survey of financial aid administrators

The study team conducted a survey of financial aid administrators to collect information directly from institutions about SAP policies and practices and the number of students affected by SAP requirements. The survey covered SAP implementation, communication practices, appeals processes, academic support services, and aggregate student outcomes. The study team conducted surveys with the nationally representative sample of 1,197 institutions from the website review (excluding three closed institutions).

We developed the survey instrument in collaboration with the National Association of Student Financial Aid Administrators (NASFAA) and pilot tested it with members of NASFAA's Rapid Response Network. The study team conducted debrief discussions with participants to identify areas requiring clarification and to reduce respondent burden. Findings from the pilot informed revisions to survey wording, response options, and instructions. The final survey was administered online and required about 30 minutes to complete.

The study team fielded the survey between February and April 2026. We conducted initial recruitment through NASFAA member institutions. For the 5 percent of institutions that were not NASFAA members, we identified publicly available contact information and conducted direct outreach. Study staff sent reminders by email throughout the field period and conducted telephone outreach to selected nonresponding institutions to encourage participation, verify contact information, and identify appropriate respondents.

Interviews and focus groups

The study team conducted interviews and focus groups to obtain in-depth perspectives on how institutions implement SAP policies and to hear directly from students about their experience. Qualitative data collection consisted of semi-structured interviews with 29 financial aid administrators, 12 financial aid or academic advising support staff, and focus groups with 14 students who had experience navigating SAP policies and requirements.[30] The next section describes the sample in more detail.

We designed the interview and focus group protocols to explore:

- Institutional implementation of SAP policies
- Communication practices related to SAP requirements
- Appeals and probation processes
- Academic and financial support services available to students
- Student understanding of SAP requirements
- Perceived barriers and supports affecting financial aid eligibility and persistence

[30] If the study team could not hold a focus group due to student schedules, the team conducted one-on-one interviews with students using an adjusted focus group protocol.

Trained researchers conducted virtual interviews[31] using semi-structured protocols that enabled interviewers to probe for additional details while maintaining consistency across participants. Qualitative interviewers followed standardized discussion guides that allowed for flexibility to explore institution-specific experiences. Similarly, we led student focus groups using a structured discussion guide.

Institution characteristics

In addition to primary data collection via the website review, surveys, interviews, and focus groups, the study team also used data on postsecondary U.S. institutions from the Integrated Postsecondary Education Data System (IPEDS) to describe institutions for the report and to draw samples used for primary data collection. We used data from the 2023–24 academic year (2022–23 for student financial aid) because 2024–25 data (2023–24 for student financial aid) were available only in provisional form at the start of the study.[32] Exhibit B.1 describes the key institution characteristics used from IPEDS and their values.

Exhibit B.1. Key institutional characteristics from IPEDS

Construct	Categories	Definition
Sector	2-year public	Defined using the combination of institutional control (IPEDS *control*) and institutional category (IPEDS *instcat*) For example, 4-year institutions are those in which over half of degrees awarded are bachelor's degrees or higher
	2-year private, nonprofit	
	2-year private, for-profit	
	4-year public	
	4-year private, nonprofit	
	4-year private, for-profit	
High-level sector	2-year	Collapsed version of the six-category sector variable
	4-year public	
	4-year private	
Region	Midwest	Institution's U.S. census region
	Northeast	
	South	
	West	
Undergraduate enrollment	n.a. (continuous variable)	Institution's number of undergraduate, degree- or certificate-seeking students enrolled in fall 2023
High proportion of Black or Hispanic students	Yes / no	**Yes** if at least 25% of an institution's undergraduate, degree- or certificate-seeking students enrolled in fall 2023 were Black or African American, or at least 25% were Hispanic or Latino
HBCU	Yes / no	**Yes** if an institution is a historically Black college or university (HBCU)

[31] We conducted a small number of staff interviews and student focus groups in person at institutions local to members of the study team.

[32] One exception was data on Pell Grant recipients, which were available only through the 2022–23 academic year at the start of the study.

Construct	Categories	Definition
Tribal college or university	Yes / no	**Yes** if an institution is a Tribal college or university
High proportion of students age 25 or older	Yes / no	**Yes** if the proportion of undergraduate students enrolled in fall 2023 who were age 25 or older exceeded the 75th percentile among institutions in the website review sample (32.2%)
High proportion of Pell Grant recipients	Yes / no	**Yes** if at least 50% of an institution's undergraduate, degree- or certificate-seeking students received Pell Grants in 2022–23
Institutional selectivity	More selective	Defined only for 4-year institutions Based on the 2021 Carnegie Undergraduate Profile Classification reported in IPEDS, which categorizes institutions using the standardized test scores of incoming students Institutions with no Carnegie classification were recategorized as inclusive
	Selective	
	Inclusive	

Sampling

Website review

Consisting of 1,200 institutions, the website review sample is a nationally representative sample of institutions in the United States, weighted by enrollment. We selected institutions using probability-proportional-to-size sampling, with undergraduate enrollment as the measure of size. Under this sampling approach, institutions that enroll more students have a higher likelihood of being selected. We drew the sample from a sampling frame that consisted of all 3,566 Title IV institutions in the United States that offer either an associate or bachelor's degree.

We explicitly stratified the sample by the following characteristics to ensure it was representative of the following types of institutions:

- Institutional sector (for example, public 4-year, private nonprofit 4-year, private for-profit 4-year, public 2-year, and other sectors)
- Geographic region, based on the four major U.S. census regions

The sample also incorporated implicit stratification to ensure representation of institutions serving populations of particular policy interest, including the following:

- Institutions with high proportions of Pell Grant recipients, defined as 50 percent or more of students receiving Pell Grants
- Institutions with a specific mission to serve specific groups of students: historically Black colleges and universities (HBCUs), Tribal colleges and universities (TCUs), and institutions where more than 25

percent of enrolled students identified as Hispanic or more than 25 percent identified as Black or African American

During data collection, we removed three institutions from the sample because they had closed between the 2023–24 academic year and fall 2025, when we collected data for our website review. The resulting sample consisted of 1,197 institutions. Exhibit B.2 compares the characteristics of institutions in the website review sample with the enrollment-weighted characteristics of institutions in the sampling frame. It shows that the website review sample closely resembles the institutions in the sampling frame, weighted by enrollment.

Exhibit B.2. Website review sample characteristics

	Sampling frame (percentage)	Website review sample (percentage)
Sample sizes	**N = 3,566**	**N = 1,197**
Sector		
2-year public	**33.5**	36.9
2-year private, nonprofit	**0.7**	0.7
2-year private, for-profit	**2.4**	3.2
4-year public	**41.5**	38.2
4-year private, nonprofit	**18.6**	18.5
4-year private, for-profit	**3.3**	2.6
High-level sector		
2-year	**36.6**	40.8
4-year public	**41.5**	38.2
4-year private	**21.9**	21.1
Region		
Midwest	**19.0**	18.8
Northeast	**16.8**	16.9
South	**36.1**	36.1
West	**28.1**	28.2
Race/ethnicity of enrolled students		
Institution has high proportion of Black students or Hispanic students	**43.5**	41.7
Institution does not have a high proportion of students age 25 or older	**56.5**	58.3
Pell Grant status of enrolled students		
Institution has high proportion of Pell Grant recipients	**14.5**	15.6
Institution does not have high proportion of Pell Grant recipients	**85.5**	84.4
Age of enrolled students		
Institution has high proportion of students age 25 or older	**23.9**	25.0

	Sampling frame (percentage)	Website review sample (percentage)
Sample sizes	**N = 3,566**	**N = 1,197**
Institution does not have a high proportion of students age 25 or older	**76.0**	75.0
Selectivity (4-year institutions only)		
More selective	**14.6**	10.8
Selective	**23.7**	20.2
Inclusive	**61.7**	69.0

Source: Website review and IPEDS 2023–24 Institutional Characteristics, Fall 2023 Enrollment, and 2022–2023 Student Financial Aid components.

Notes: Reported statistics for the sampling frame are weighted by undergraduate, degree/certificate-seeking enrollment, except for the reported average undergraduate, degree/certificate-seeking enrollment. Reported statistics for the website review sample are unweighted.

IPEDS = Integrated Postsecondary Education Data System.

Survey of financial aid administrators

We administered the survey to 1,197 institutions in the website review sample. A total of 220 institutions completed the survey, yielding an overall response rate of 18.3 percent. Although not all institutions responded, the characteristics of institutions in the survey sample still closely resembled the characteristics of the website review sample it was drawn from as well as the enrollment-weighted sampling frame (see Exhibit B.3).

Exhibit B.3. Survey sample characteristics

	Sampling frame (percentage)	Website review sample (percentage)	Survey sample (percentage)
Sample sizes	**N = 3,566**	**N = 1,197**	**N= 220**
Sector			
2-year public	**33.5**	36.9	38.7
2-year private, nonprofit	**0.7**	0.7	0.6
2-year private, for-profit	**2.4**	3.2	1.2
4-year public	**41.5**	38.2	38.0
4-year private, nonprofit	**18.6**	18.5	19.3
4-year private, for-profit	**3.3**	2.6	2.2
High-level sector			
2-year	**36.6**	40.8	40.5
4-year public	**41.5**	38.2	38.0
4-year private	**21.9**	21.1	21.5
Region			
Midwest	**19.0**	18.8	19.2
Northeast	**16.8**	16.9	17.3
South	**36.1**	36.1	34.9
West	**28.1**	28.2	28.5

	Sampling frame (percentage)	Website review sample (percentage)	Survey sample (percentage)
Sample sizes	**N = 3,566**	**N = 1,197**	**N= 220**
Race/ethnicity of enrolled students			
Institution has high proportion of Black students or Hispanic students	**43.5**	41.7	41.0
Institution does not have a high proportion of students age 25 or older	**56.5**	58.3	59.0
Pell Grant status of enrolled student			
Institution has high proportion of Pell Grant recipients	**14.5**	15.6	13.3
Institution does not have high proportion of Pell Grant recipients	**85.5**	84.4	86.7
Age of enrolled students			
Institution has high proportion of students age 25 or older	**23.9**	25.0	23.5
Institution does not have a high proportion of students age 25 or older	**76.0**	75.0	76.5
Selectivity (4-year institutions only)			
More selective	**14.6**	10.8	11.5
Selective	**23.7**	20.2	19.5
Inclusive	**61.7**	69.0	69.0

Source: FAA survey, website review, and IPEDS 2023–24 Institutional Characteristics, Fall 2023 Enrollment, and 2022–2023 Student Financial Aid components.

Notes: Reported statistics for the sampling frame are weighted by undergraduate, degree/certificate-seeking enrollment, except for the reported average undergraduate, degree/certificate-seeking enrollment. Reported statistics for the website review sample are unweighted. Reported statistics for the survey sample are weighted using nonresponse weights to adjust for institutions that did not respond to the survey.

FAA = financial aid administrator; IPEDS = Integrated Postsecondary Education Data System.

The study team also developed nonresponse weights to account for any remaining differences in the types of institutions that responded to the survey. To create these weights, we estimated a logistic regression predicting the probability that an institution would respond to the survey based on certain institution characteristics. These characteristics included the number of enrolled undergraduate students; the race/ethnicity of enrolled students (such as the percentage of White students); selectivity; sector; whether an institution is an HBCU, is a TCU, or serves a high percentage of Black or African American students or a high percentage of Hispanic or Latino students; whether it has a high proportion of Pell Grant recipients or students age 25 or older; graduation rate within 150 percent time; and region. We used the predicted values from this regression to generate weights based on the inverse of the predicted probability of responding. In other words, the types of institutions that were less likely to respond received a greater weight than the types of institutions that were more likely to respond. We trimmed weights over the 95th percentile to avoid giving a very large weight to any one respondent.

Interview sampling. We drew the qualitative sample from institutions that completed the survey and indicated in their responses that they were willing to participate in additional study activities. We asked survey respondents whether they consented to future contact, and institutions answering affirmatively formed the initial pool for qualitative recruitment.

We selected institutions in consultation with NASFAA. Because the survey sample was nationally representative, we did not use formal subsampling procedures; instead, we used a convenience sampling approach to assemble the qualitative interview sample. However, the study team prioritized recruitment to ensure variation across several characteristics, including:

- Geographic region and state
- Two- and 4-year institutions
- Public and private institutions
- Private nonprofit and private for-profit institutions
- HBCUs, TCUs, institutions serving a large percentage of Black or African American students, and institutions serving a large percentage of Hispanic or Latino students
- Institutions serving large proportions of Pell Grant recipients

Additional considerations included feedback from NASFAA regarding particularly informative respondents and logistical considerations related to interview scheduling.

Recruitment proceeded through a staggered outreach process. Interviewers contacted small groups of institutions, monitored scheduling outcomes, and then initiated additional outreach as needed. This approach reduced the likelihood of oversampling and helped maintain balance across institutional characteristics.

The qualitative sample included institutions representing a diverse range of regions, institutional characteristics, and student populations. The final qualitative sample consisted of 29 financial aid administrators, 12 financial aid or academic advisors, and 14 students across 22 institutions. Exhibit B.4 shows additional institutional characteristics.

Exhibit B.4. Characteristics of institutions included in qualitative sample

States represented	
17 (across all four major U.S. census regions: Northeast, Midwest, South, and West)	
By sector	
2-year	6
4-year public	11
4-year private	5
High proportion of Black or Hispanic students	
7 institutions	
High proportion of Pell Grant recipients	
7 institutions	

Methods

Website review and survey of financial aid administrators

To summarize data collected from the website review and the survey of financial aid administrators, the study team calculated the average share of institutions in the sample reporting different SAP policies. The team also disaggregated data by key institution characteristics, such as its sector and selectivity. Because some institutions did not respond to the survey, we applied nonresponse weights to all data reported from survey respondents.

In the report, we also estimated how many students failed SAP nationally during either the spring 2025 or 2024–25 academic year SAP review (depending on whether an institution evaluates SAP once per term or once per academic year). Using data from the survey, we calculated that, of students nationally enrolled at institutions that participate in Title IV programs and offer associate or bachelor's degrees, 13 percent fail SAP in a typical evaluation. Given that 13,842,118 degree- or certificate-seeking students were enrolled nationally at these institutions in fall 2024, we estimated that over 1.8 million students failed SAP during either spring 2025 or the 2024–25 academic year.

Most institutions in the sample (about 80 percent) assess SAP on all students enrolled in a given term or academic year during SAP evaluations (depending on whether they assess SAP each term or academic year), whereas others only assess SAP for financial aid applicants or recipients. Also, about one-fifth of the institutions assess SAP for students they expect to re-enroll in the next term or academic year, in addition to any current students. To estimate the number of students nationally who failed SAP, we assumed the SAP failure rate would be the same for an institution regardless of whether it assesses SAP for all enrolled students, just for financial aid recipients, or for all enrolled students plus any students expected to re-enroll in the next term or academic year.

Interviews and focus groups

The study team conducted structured interviews and semi-structured focus groups with the interview sample identified previously. We conducted nearly all interviews virtually, although a few interviews and focus groups were held during in-person site visits to two institutions that were local to members of the study team. The qualitative data from our interview and focus group notes and transcripts then informed our analysis and reporting. After all interviews and focus groups were completed, we held a group sensemaking session to synthesize emerging themes and topics of interest from interviews. This discussion guided the development of a thematic coding framework used to map topics across interviews with staff and students. The coding of staff interviews focused on common implementation practices, student supports, key challenges, and recommendations for improvement, and the coding of student interviews and focus groups centered on the understanding of SAP policies, access to information and support, experiences with SAP warnings and appeals, factors contributing to SAP difficulties, and recommendations for improving SAP policies and processes.

Appendix C. Tables of Findings

This appendix includes the following detailed tables of findings from the report.

- Exhibits C.1 and C.2 describe the percentage of students failing SAP overall and by requirement.
- Exhibit C.3 describes the percentage of students losing federal aid eligibility after failing SAP, and Exhibit C.4 describes the percentage who receive a warning or file an appeal after failing SAP.
- Exhibit C.5 covers particular groups of students who might struggle to meet SAP requirements and the common reasons they cite for struggling to meet the requirements.
- Exhibit C.6 describes the percentage of students attending institutions opting for different SAP evaluation periods, Exhibit C.7 describes the percentage at institutions with various GPA requirements by the end of the second academic year, and Exhibit C.8 describes the percentage of those at institutions that ladder their GPA requirement in the first two academic years.
- Exhibit C.9 describes the percentage of students attending institutions that use different SAP pace-of-progress requirements, while Exhibit C.10 details the percentage attending institutions that use a laddered SAP pace-of-progress requirement in the first two academic years.
- Exhibit C.11 describes the percentage of students attending institutions that set a maximum time frame requirement at or less than 150 percent of program length, and Exhibit C.12 covers the percentage of students at institutions that calculate maximum time frame using calendar time or credit hours.
- Exhibit C.13 provides more detail on the percentage of students attending institutions that count developmental courses in attempted clock or credit-hour calculations and the percentage attending institutions that offer warnings and formal appeals processes. Exhibit C.14 describes the reasons appeals might be approved or denied, and Exhibit C.15 covers different appeal policies that institutions may use. Exhibit C.16 describes the percentage of students attending institutions that use academic plans or put students on probation without an academic plan.
- Exhibit C.17 covers the percentage of students receiving communication from institutions about SAP at various times, as well as the mode of that communication.
- Exhibit C.18 describes the various supports institutions offer to students who are notified that they are at risk of failing to meet SAP requirements or those who are filing an appeal.

Exhibit C.1. Percentage of students failing SAP

	Percentage
Overall	13.1
By high-level sector	
2-year	22.1
4-year public	8.2
4-year private	5.0
By race/ethnicity of enrolled students	
Institution has high proportion of Black students or Hispanic students	15.4
Institution does not have high proportion of Black students or Hispanic students	11.6
By age of enrolled students	
Institution has a high proportion of students age 25 or older	14.5
Institution does not have a high proportion of students age 25 or older	12.7
By Pell Grant status of enrolled students	
Institution has high proportion of Pell Grant recipients	14.2
Institution does not have high proportion of Pell Grant recipients	13.0
By selectivity (4-year institutions only)	
More selective	2.5
Selective	6.4
Inclusive	9.3

Source: FAA survey and IPEDS 2023–24 Institutional Characteristics, Fall 2023 Enrollment, and 2022–2023 Student Financial Aid components.

Notes: Sample includes 194 institutions that responded to the survey and reported information about the number of students failing SAP. The sample of 2-year institutions is 70 institutions, the sample of 4-year public institutions is 88 institutions, and the sample of 4-year private institutions is 36 institutions. Nonresponse weights are used to adjust for institutions that did not respond to the survey. The study's sample of institutions providing data on SAP failure rates included fewer than 10 for-profit colleges—a sample size that is too small to reliably estimate SAP failure rates at for-profit institutions.

FAA = financial aid administrator; IPEDS = Integrated Postsecondary Education Data System; SAP = satisfactory academic progress.

Exhibit C.2. Percentage of students failing SAP, by requirement

	Percentage
Students failing the GPA requirement	
Overall	5.4
By level	
2-year	7.8
4-year	4.3
Students failing the pace-of-progress requirement	
Overall	5.6
By level	
2-year	10.2
4-year	3.5
Students failing the maximum time frame requirement	
Overall	2.7
By level	
2-year	6.6
4-year	0.8

Source: FAA survey and IPEDS 2023–24 Institutional Characteristics component.

Notes: Sample includes 96 institutions responding to the survey that were able to report the number of students failing each of the three SAP requirements and passed data validation checks. Some institutions are not able to report the number of students failing each standard due to how they collect and manage their data. Nonresponse weights are used to adjust for institutions that did not respond to the survey. Data on 2-year institutions and 4-year institutions include both private and public institutions.

FAA = financial aid administrator; GPA = grade point average; IPEDS = Integrated Postsecondary Education Data System; SAP = satisfactory academic progress.

Exhibit C.3. Percentage of students losing aid eligibility (among those who fail SAP)

	Percentage
Overall	54.0
By high-level sector	
2-year	59.4
4-year public	62.6
4-year private	38.5
By race/ethnicity of enrolled students	
Institution has high proportion of Black students or Hispanic students	58.9
Institution does not have high proportion of Black students or Hispanic students	51.7
By age of enrolled students	
Institution has a high proportion of students age 25 or older	51.6
Institution does not have a high proportion of students age 25 or older	54.7
By Pell Grant status of enrolled students	
Institution has high proportion of Pell Grant recipients	55.8
Institution does not have high proportion of Pell Grant recipients	53.8
By selectivity (4-year institutions only)	
More selective	50.1
Selective	51.1
Inclusive	53.0

Source: FAA survey and IPEDS 2023–24 Institutional Characteristics, Fall 2023 Enrollment, and 2022–2023 Student Financial Aid components.

Notes: Sample includes 103 institutions responding to the survey that were able to report the number of students who failed SAP, were placed on warning (or indicated that they did not use warnings), and received appeals, and the number of appeals that were approved. The sample is also limited to institutions that passed all data validation checks for these numbers. For example, the number of students placed on warning could not be larger than the number that failed SAP. Nonresponse weights are used to adjust for institutions that did not respond to the survey.

FAA = financial aid administrator; IPEDS = Integrated Postsecondary Education Data System; SAP = satisfactory academic progress.

Exhibit C.4. Warnings and appeals among students who fail SAP

	Percentage
Placed on warning (among those who fail SAP)	
Overall	26.6
By high-level sector	
2-year	26.6
4-year public	17.8
4-year private	37.4
By whether institution offers warnings	
Institution offers warnings	42.7
Institution does not offer warnings	0.0
Filed an appeal (among those who fail SAP)	
Overall	24.2
By high-level sector	
2-year	18.7
4-year public	26.1
4-year private	26.9
Had an appeal approved (among those who fail SAP)	
Overall	19.4
By high-level sector	
2-year	14.0
4-year public	19.5
4-year private	24.2
Had an appeal approved (among those who fail SAP and filed an appeal)	
Overall	74.9
By high-level sector	
2-year	72.1
4-year public	71.0
4-year private	83.1

Source: FAA survey and IPEDS 2023–24 Institutional Characteristics component.

Notes: Sample includes 103 institutions responding to the survey that were able to report the number of students who failed SAP, were placed on warning (or indicated that they did not use warnings), and received appeals, and the number of appeals that were approved. The sample is also limited to institutions that passed all data validation checks for these numbers. For example, the number of students placed on warning could not be larger than the number that failed SAP. The percentage of appeals approved if a student appealed has a slightly smaller sample size (N = 101) because two institutions did not receive any appeals. Nonresponse weights are used to adjust for institutions that did not respond to the survey.

FAA = financial aid administrator; IPEDS = Integrated Postsecondary Education Data System.

Exhibit C.5. Student groups and reasons for struggling to meet SAP

	Overall (percentage)	2-year (percentage)	4-year public (percentage)	4-year private (percentage)
Do you see a disproportionate number of students in any of the following groups struggle to meet SAP requirements?				
Low-income students	36.7	35.7	40.8	31.3
First generation college students	36.7	33.8	42.9	31.0
Do not see a disproportionate number of students in any groups struggle to meet SAP requirements	34.9	36.2	35.1	32.2
First-year students	29.1	28.2	34.5	21.3
Adult learners	19.9	25.0	12.3	23.6
Students who are employed	17.0	21.7	17.2	7.5
Students with disabilities	15.0	27.3	9.6	1.4
Students who are parents or caregivers	13.4	24.3	4.7	8.4
Students who attend primarily or fully online	11.9	18.2	6.1	10.0
Transfer students	11.4	7.3	19.3	5.2
Students with foster care experience	11.0	19.9	5.8	3.3
Students who are enrolled part-time	5.6	6.6	5.6	3.7
Do not track these student groups	4.6	7.0	4.6	0.0
Other	3.9	1.2	3.9	9.2
Students of a particular race or ethnicity	2.8	5.9	1.2	0.0
Military-affiliated students	1.4	0.8	2.8	0.0
What do students most commonly cite as the reason(s) they struggle to meet SAP requirements?				
Life circumstances affecting attendance	91.5	97.6	92.0	79.3
Health challenges	85.3	82.2	87.9	86.7
Time management issues	60.3	59.1	60.1	63.0
Insufficient academic preparation	51.9	44.6	59.5	52.2
Difficulty recovering from early academic setbacks	51.6	57.4	54.5	35.8
Financial barriers	38.4	52.0	36.7	15.9

	Overall (percentage)	2-year (percentage)	4-year public (percentage)	4-year private (percentage)
Learning disabilities	37.4	46.7	36.2	22.0
Course selection challenges	29.9	38.2	30.0	14.0
Lack of awareness about academic support resources	27.8	29.9	29.2	21.5
Administrative challenges	16.6	22.1	15.3	8.8
Difficulty understanding SAP policy components	6.1	10.1	5.4	0.0
Other	1.5	1.6	2.2	0.0

Source: FAA survey and IPEDS 2023–24 Institutional Characteristics component.

Notes: The sample for the first question ("Do you see a disproportionate number of students in any of the following groups struggle to meet SAP requirements?") includes 211 institutions that responded to the survey regarding struggles to meet SAP requirements among various student groups (77 2-year institutions, 99 4-year public institutions, and 35 4-year private institutions). The sample for the second question ("What do students most commonly cite as the reason(s) they struggle to meet SAP requirements?") includes 219 institutions that responded to the survey regarding student-provided reasons for struggling to meet SAP (79 2-year institutions, 103 4-year public institutions, and 37 4-year private institutions). Nonresponse weights are used to adjust for institutions that did not respond to the survey.

FAA = financial aid administrator; IPEDS = Integrated Postsecondary Education Data System; SAP = satisfactory academic progress.

Exhibit C.6. Frequency of SAP evaluations

	At the end of each payment period (percentage)	Only once per academic year (percentage)
Overall		
All institutions	72.6	27.4
By institutional governance		
Private for-profit	89.9	10.1
Private nonprofit	59.2	40.8
Public	74.6	25.4
By race/ethnicity of enrolled students		
Institution has high proportion of Black students or Hispanic students	77.2	22.8
Institution does not have high proportion of Black students or Hispanic students	69.3	30.7
By Pell Grant status of enrolled students		
Institution has high proportion of Pell Grant recipients	74.3	25.7
Institution does not have high proportion of Pell Grant recipients	72.2	27.8
By age of enrolled students		
Institution has a high proportion of students age 25 or older	83.6	16.4
Institution does not have a high proportion of students age 25 or older	68.9	31.1
Two-year institutions		
All two-year institutions	90.6	9.4
By institutional governance		
Private for-profit	94.7	5.3
Private nonprofit	100.0	0.0
Public	90.0	10.0
By race/ethnicity of enrolled students		
Institution has high proportion of Black students or Hispanic students	91.2	8.8
Institution does not have high proportion of Black students or Hispanic students	89.7	10.3
By Pell Grant status of enrolled students		
Institution has high proportion of Pell Grant recipients	86.5	13.5
Institution does not have high proportion of Pell Grant recipients	91.6	8.4
By age of enrolled students		
Institution has a high proportion of students age 25 or older	91.2	8.8
Institution does not have a high proportion of students age 25 or older	90.1	9.9
Four-year institutions		
All four-year institutions	60.2	39.8
By institutional governance		

	At the end of each payment period (percentage)	Only once per academic year (percentage)
Private for-profit	83.9	16.1
Private nonprofit	57.7	42.3
Public	59.7	40.3
By selectivity		
More selective	50.0	50.0
Selective	59.8	40.2
Inclusive	64.2	35.8
By race/ethnicity of enrolled students		
Institution has high proportion of Black students or Hispanic students	57.1	42.9
Institution does not have high proportion of Black students or Hispanic students	61.4	38.6
By Pell Grant status of enrolled students		
Institution has high proportion of Pell Grant recipients	61.5	38.5
Institution does not have high proportion of Pell Grant recipients	60.0	40.0
By age of enrolled students		
Institution has a high proportion of students age 25 or older	69.5	30.5
Institution does not have a high proportion of students age 25 or older	58.5	41.5

Source: Website review.

Notes: The sample for the frequency of SAP evaluation periods is 1,196 institutions. The sample for 2-year institutions is 488 institutions, and the sample for 4-year institutions is 708 institutions. One institution was excluded from the sample because information on its SAP policy could not be located.

SAP = satisfactory academic progress.

Exhibit C.7. SAP GPA requirements by the end of the second academic year

	Lower than a 2.0 (percentage)	2.0 (percentage)	Higher than a 2.0 (percentage)
Overall			
All institutions	4.0	95.6	0.3
By institutional governance			
Private for-profit	10.1	88.4	1.4
Private nonprofit	9.9	89.2	0.9
Public	2.1	97.8	0.1
By race/ethnicity of enrolled students			
Institution has high proportion of Black students or Hispanic students	2.8	97.0	0.2
Institution does not have high proportion of Black students or Hispanic students	4.9	94.7	0.4
By Pell Grant status of enrolled students			
Institution has high proportion of Pell Grant recipients	7.5	92.5	0.0
Institution does not have high proportion of Pell Grant recipients	3.4	96.2	0.4
By age of enrolled students			
Institution has a high proportion of students age 25 or older	3.4	96.0	0.7
Institution does not have a high proportion of students age 25 or older	4.3	95.5	0.2
Two-year institutions			
All two-year institutions	0.8	99.0	0.2
By institutional governance			
Private for-profit	0.0	97.4	2.6
Private nonprofit	0.0	100.0	0.0
Public	0.9	99.1	0.0
By race/ethnicity of enrolled students			
Institution has high proportion of Black students or Hispanic students	1.0	98.6	0.3
Institution does not have high proportion of Black students or Hispanic students	0.5	99.5	0.0
By Pell Grant status of enrolled students			
Institution has high proportion of Pell Grant recipients	4.2	95.8	0.0
Institution does not have high proportion of Pell Grant recipients	0.0	99.7	0.3
By age of enrolled students			

	Lower than a 2.0 (percentage)	2.0 (percentage)	Higher than a 2.0 (percentage)
Institution has a high proportion of students age 25 or older	0.5	99.0	0.5
Institution does not have a high proportion of students age 25 or older	1.0	99.0	0.0
Four-year institutions			
All four-year institutions	6.3	93.3	0.4
By institutional governance			
Private for-profit	22.6	77.4	0.0
Private nonprofit	10.2	88.8	0.9
Public	3.3	96.5	0.2
By selectivity			
More selective	6.4	92.8	0.8
Selective	5.4	94.1	0.4
Inclusive	6.8	92.9	0.3
By race/ethnicity of enrolled students			
Institution has high proportion of Black students or Hispanic students	5.4	94.6	0.0
Institution does not have high proportion of Black students or Hispanic students	6.6	92.8	0.6
By Pell Grant status of enrolled students			
Institution has high proportion of Pell Grant recipients	11.0	89.0	0.0
Institution does not have high proportion of Pell Grant recipients	5.6	94.0	0.5
By age of enrolled students			
Institution has a high proportion of students age 25 or older	8.7	90.3	1.0
Institution does not have a high proportion of students age 25 or older	5.8	93.8	0.3

Source: Website review.

Notes: The sample for the SAP GPA standards at the end of the second academic year is 1,191 institutions. The sample for 2-year institutions is 488 institutions, and the sample for 4-year institutions is 703 institutions. Five institutions were excluded because they did not use a GPA requirement. One institution was excluded from the sample because information on its SAP policy could not be located. Percentages may not sum to 100.0 because of rounding.

GPA = grade point average; SAP = satisfactory academic progress.

Exhibit C.8. Laddered GPA requirements in the first two academic years

	Laddered GPA requirement (percentage)	Fixed GPA requirement (percentage)
Overall		
All institutions	26.4	73.6
By institutional governance		
Private for-profit	46.4	53.6
Private nonprofit	37.2	62.8
Public	22.2	77.8
By race/ethnicity of enrolled students		
Institution has high proportion of Black students or Hispanic students	23.0	77.0
Institution does not have high proportion of Black students or Hispanic students	28.9	71.1
By Pell Grant status of enrolled students		
Institution has high proportion of Pell Grant recipients	40.6	59.4
Institution does not have high proportion of Pell Grant recipients	23.8	76.2
By age of enrolled students		
Institution has a high proportion of students age 25 or older	20.2	79.8
Institution does not have a high proportion of students age 25 or older	28.5	71.5
Two-year institutions		
All two-year institutions	21.7	78.3
By institutional governance		
Private for-profit	42.1	57.9
Private nonprofit	37.5	62.5
Public	19.7	80.3
By race/ethnicity of enrolled students		
Institution has high proportion of Black students or Hispanic students	20.4	79.6
Institution does not have high proportion of Black students or Hispanic students	23.7	76.3
By Pell Grant status of enrolled students		
Institution has high proportion of Pell Grant recipients	39.6	60.4
Institution does not have high proportion of Pell Grant recipients	17.3	82.7
By age of enrolled students		

	Laddered GPA requirement (percentage)	Fixed GPA requirement (percentage)
Institution has a high proportion of students age 25 or older	17.5	82.5
Institution does not have a high proportion of students age 25 or older	24.5	75.5
Four-year institutions		
All four-year institutions	29.7	70.3
By institutional governance		
Private for-profit	51.6	48.4
Private nonprofit	37.2	62.8
Public	24.7	75.3
By selectivity		
More selective	21.6	78.4
Selective	29.3	70.7
Inclusive	33.0	67.0
By race/ethnicity of enrolled students		
Institution has high proportion of Black students or Hispanic students	26.8	73.2
Institution does not have high proportion of Black students or Hispanic students	30.9	69.1
By Pell Grant status of enrolled students		
Institution has high proportion of Pell Grant recipients	41.8	58.2
Institution does not have high proportion of Pell Grant recipients	27.9	72.1
By age of enrolled students		
Institution has a high proportion of students age 25 or older	25.2	74.8
Institution does not have a high proportion of students age 25 or older	30.5	69.5

Source: Website review.

Notes: The sample for the SAP laddered GPA standard in the first two academic years is 1,191 institutions. The sample for 2-year institutions is 488 institutions, and the sample for 4-year institutions is 703 institutions. Five institutions were excluded because they did not use a GPA requirement. One institution was excluded from the sample because information on its SAP policy could not be located.

GPA = grade point average; SAP = satisfactory academic progress.

Exhibit C.9. SAP pace-of-progress requirements

	Less than a 67-percent course completion rate (percentage)	67-percent course completion rate (percentage)	Higher than a 67-percent course completion rate (percentage)
Overall			
All institutions	3.9	90.7	5.5
By institutional governance			
Private for-profit	7.6	90.9	1.5
Private nonprofit	4.9	81.8	13.3
Public	3.3	92.9	3.8
By race/ethnicity of enrolled students			
Institution has high proportion of Black students or Hispanic students	4.0	93.8	2.2
Institution does not have high proportion of Black students or Hispanic students	3.8	88.4	7.8
By Pell Grant status of enrolled students			
Institution has high proportion of Pell Grant recipients	9.6	88.2	2.1
Institution does not have high proportion of Pell Grant recipients	2.8	91.1	6.1
By age of enrolled students			
Institution has a high proportion of students age 25 or older	4.7	93.9	1.4
Institution does not have a high proportion of students age 25 or older	3.6	89.6	6.8
Two-year institutions			
All two-year institutions	1.0	97.3	1.7
By institutional governance			
Private for-profit	2.9	94.3	2.9
Private nonprofit	0.0	100.0	0.0
Public	0.9	97.5	1.6
By race/ethnicity of enrolled students			
Institution has high proportion of Black students or Hispanic students	1.0	98.3	0.7
Institution does not have high proportion of Black students or Hispanic students	1.0	95.8	3.1
By Pell Grant status of enrolled students			
Institution has high proportion of Pell Grant recipients	3.1	93.8	3.1
Institution does not have high proportion of Pell Grant recipients	0.5	98.2	1.3

	Less than a 67-percent course completion rate (percentage)	67-percent course completion rate (percentage)	Higher than a 67-percent course completion rate (percentage)
By age of enrolled students			
Institution has a high proportion of students age 25 or older	1.6	98.4	0.0
Institution does not have a high proportion of students age 25 or older	0.7	96.6	2.7
Four-year institutions			
All four-year institutions	5.8	86.1	8.1
By institutional governance			
Private for-profit	12.9	87.1	0.0
Private nonprofit	5.1	81.1	13.8
Public	5.7	88.4	5.9
By selectivity			
More selective	7.1	73.8	19.0
Selective	5.5	86.6	8.0
Inclusive	5.6	90.3	4.1
By race/ethnicity of enrolled students			
Institution has high proportion of Black students or Hispanic students	8.3	87.3	4.4
Institution does not have high proportion of Black students or Hispanic students	4.8	85.6	9.6
By Pell Grant status of enrolled students			
Institution has high proportion of Pell Grant recipients	16.5	82.4	1.1
Institution does not have high proportion of Pell Grant recipients	4.2	86.6	9.1
By age of enrolled students			
Institution has a high proportion of students age 25 or older	10.6	85.6	3.8
Institution does not have a high proportion of students age 25 or older	5.0	86.2	8.8

Source: Website review.

Notes: The sample for the SAP pace-of-progress requirement at the end of the second academic year is 1,188 institutions. The sample for 2-year institutions is 484 institutions, and the sample for 4-year institutions is 704 institutions. Nine institutions were excluded because information about the pace-of-progress requirement was unknown (conflicting information or unclear). Percentages may not sum to 100.0 because of rounding.

SAP = satisfactory academic progress.

Exhibit C.10. Laddered SAP pace-of-progress requirements in the first two academic years

	Laddered pace-of-progress requirement (percentage)	Fixed pace-of-progress requirement (percentage)
Overall		
All institutions	11.2	88.8
By institutional governance		
Private for-profit	37.9	62.1
Private nonprofit	11.6	88.4
Public	9.1	90.9
By race/ethnicity of enrolled students		
Institution has high proportion of Black students or Hispanic students	12.3	87.7
Institution does not have high proportion of Black students or Hispanic students	10.4	89.6
By Pell Grant status of enrolled students		
Institution has high proportion of Pell Grant recipients	26.7	73.3
Institution does not have high proportion of Pell Grant recipients	8.3	91.7
By age of enrolled students		
Institution has a high proportion of students age 25 or older	11.2	88.8
Institution does not have a high proportion of students age 25 or older	11.2	88.8
Two-year institutions		
All two-year institutions	11.2	88.8
By institutional governance		
Private for-profit	40.0	60.0
Private nonprofit	12.5	87.5
Public	8.8	91.2
By race/ethnicity of enrolled students		
Institution has high proportion of Black students or Hispanic students	11.3	88.7
Institution does not have high proportion of Black students or Hispanic students	10.9	89.1
By Pell Grant status of enrolled students		
Institution has high proportion of Pell Grant recipients	30.2	69.8
Institution does not have high proportion of Pell Grant recipients	6.4	93.6
By age of enrolled students		

	Laddered pace-of-progress requirement (percentage)	Fixed pace-of-progress requirement (percentage)
Institution has a high proportion of students age 25 or older	8.9	91.1
Institution does not have a high proportion of students age 25 or older	12.6	87.4
Four-year institutions		
All four-year institutions	11.2	88.8
By institutional governance		
Private for-profit	35.5	64.5
Private nonprofit	11.5	88.5
Public	9.4	90.6
By selectivity		
More selective	14.3	85.7
Selective	12.6	87.4
Inclusive	9.1	90.9
By race/ethnicity of enrolled students		
Institution has high proportion of Black students or Hispanic students	13.7	86.3
Institution does not have high proportion of Black students or Hispanic students	10.2	89.8
By Pell Grant status of enrolled students		
Institution has high proportion of Pell Grant recipients	23.1	76.9
Institution does not have high proportion of Pell Grant recipients	9.5	90.5
By age of enrolled students		
Institution has a high proportion of students age 25 or older	15.4	84.6
Institution does not have a high proportion of students age 25 or older	10.5	89.5

Source: Website review.

Notes: The sample for the use of a SAP laddered pace-of-progress requirement in the first two academic years is 1,188 institutions. The sample for 2-year institutions is 484 institutions, and the sample for 4-year institutions is 704 institutions. Nine institutions were excluded because information about the pace-of-progress requirement was unknown (conflicting information or unclear).

SAP = satisfactory academic progress.

Exhibit C.11. Maximum time frame standards

	Maximum time frame requirement is less than 150 percent of program length (percentage)	Maximum time frame requirement is 150 percent of program length (percentage)
Overall		
All institutions	2.1	97.9
By institutional governance		
Private for-profit	1.5	98.5
Private nonprofit	4.5	95.5
Public	1.6	98.4
By race/ethnicity of enrolled students		
Institution has high proportion of Black students or Hispanic students	1.2	98.8
Institution does not have high proportion of Black students or Hispanic students	2.8	97.2
By Pell Grant status of enrolled students		
Institution has high proportion of Pell Grant recipients	1.1	98.9
Institution does not have high proportion of Pell Grant recipients	2.3	97.7
By age of enrolled students		
Institution has a high proportion of students age 25 or older	2.4	97.6
Institution does not have a high proportion of students age 25 or older	2.0	98.0
Two-year institutions		
All two-year institutions	0.2	99.8
By institutional governance		
Private for-profit	2.7	97.3
Private nonprofit	0.0	100.0
Public	0.0	100.0
By race/ethnicity of enrolled students		
Institution has high proportion of Black students or Hispanic students	0.3	99.7
Institution does not have high proportion of Black students or Hispanic students	0.0	100.0
By Pell Grant status of enrolled students		
Institution has high proportion of Pell Grant recipients	0.0	100.0
Institution does not have high proportion of Pell Grant recipients	0.3	99.7

	Maximum time frame requirement is less than 150 percent of program length (percentage)	Maximum time frame requirement is 150 percent of program length (percentage)
By age of enrolled students		
Institution has a high proportion of students age 25 or older	0.5	99.5
Institution does not have a high proportion of students age 25 or older	0.0	100.0
Four-year institutions		
All four-year institutions	3.4	96.6
By institutional governance		
Private for-profit	0.0	100.0
Private nonprofit	4.7	95.3
Public	3.1	96.9
By selectivity		
More selective	11.9	88.1
Selective	1.3	98.7
Inclusive	1.8	98.2
By race/ethnicity of enrolled students		
Institution has high proportion of Black students or Hispanic students	2.4	97.6
Institution does not have high proportion of Black students or Hispanic students	3.8	96.2
By Pell Grant status of enrolled students		
Institution has high proportion of Pell Grant recipients	2.2	97.8
Institution does not have high proportion of Pell Grant recipients	3.6	96.4
By age of enrolled students		
Institution has a high proportion of students age 25 or older	5.7	94.3
Institution does not have a high proportion of students age 25 or older	3.0	97.0

Source: Website review.

Notes: The sample for the maximum time frame standard is 1,185 institutions. The sample for 2-year institutions is 482 institutions, and the sample for 4-year institutions is 703 institutions. 12 institutions were excluded from the sample because information about their maximum time frame requirement for SAP was unknown (conflicting information or unclear).

SAP = satisfactory academic progress.

Exhibit C.12. Credit hours or calendar time to calculate maximum time frame

	Credit hours (percentage)	Calendar time (percentage)
Overall		
All institutions	96.8	3.2
By institutional governance		
Private for-profit	98.5	1.5
Private nonprofit	85.7	14.3
Public	99.4	0.6
By race/ethnicity of enrolled students		
Institution has high proportion of Black students or Hispanic students	99.6	0.4
Institution does not have high proportion of Black students or Hispanic students	94.8	5.2
By Pell Grant status of enrolled students		
Institution has high proportion of Pell Grant recipients	99.5	0.5
Institution does not have high proportion of Pell Grant recipients	96.3	3.7
By age of enrolled students		
Institution has a high proportion of students age 25 or older	99.3	0.7
Institution does not have a high proportion of students age 25 or older	96.0	4.0
Two-year institutions		
All two-year institutions	100.0	0.0
By institutional governance		
Private for-profit	100.0	0.0
Private nonprofit	100.0	0.0
Public	100.0	0.0
By race/ethnicity of enrolled students		
Institution has high proportion of Black students or Hispanic students	100.0	0.0
Institution does not have high proportion of Black students or Hispanic students	100.0	0.0
By Pell Grant status of enrolled students		
Institution has high proportion of Pell Grant recipients	100.0	0.0
Institution does not have high proportion of Pell Grant recipients	100.0	0.0

	Credit hours (percentage)	Calendar time (percentage)
By age of enrolled students		
Institution has a high proportion of students age 25 or older	100.0	0.0
Institution does not have a high proportion of students age 25 or older	100.0	0.0
Four-year institutions		
All four-year institutions	94.6	5.4
By institutional governance		
Private for-profit	96.8	3.2
Private nonprofit	85.1	14.9
Public	98.9	1.1
By selectivity		
More selective	81.7	18.3
Selective	95.8	4.2
Inclusive	98.5	1.5
By race/ethnicity of enrolled students		
Institution has high proportion of Black students or Hispanic students	99.0	1.0
Institution does not have high proportion of Black students or Hispanic students	92.8	7.2
By Pell Grant status of enrolled students		
Institution has high proportion of Pell Grant recipients	98.9	1.1
Institution does not have high proportion of Pell Grant recipients	94.0	6.0
By age of enrolled students		
Institution has a high proportion of students age 25 or older	98.1	1.9
Institution does not have a high proportion of students age 25 or older	94.0	6.0

Source: Website review.

Notes: The sample for the use of calendar time or credit hours for the maximum time frame requirement is 1,185 institutions. The sample for 2-year institutions is 482 institutions, and the sample for 4-year institutions is 703 institutions. 12 institutions were excluded from the sample because information about their maximum time frame requirement for SAP was unknown (conflicting information or unclear).

SAP = satisfactory academic progress.

Exhibit C.13. Coursework, warnings, and appeals

	Percentage
Does your institution include remedial/developmental courses in attempted clock or credit hours?	
Overall	64.4
By high-level sector	
2-year	76.3
4-year public	69.7
4-year private	30.6
Does your institution offer warnings?	
Overall	75.8
By level	
2-year	88.7
4-year	66.9
By whether institution assesses SAP each term	
Institution assesses SAP each term	94.8
Does your institution have a formal appeals process for students who fail to meet SAP?	
Overall	100.0
By high-level sector	
2-year	100.0
4-year public	100.0
4-year private	100.0

Source: FAA survey and IPEDS 2023–24 Institutional Characteristics component.

Notes: The sample for the first question ("Does your institution include remedial/developmental courses in attempted clock or credit hours?") includes 210 institutions that responded to questions about which courses were included in SAP calculations. Nonresponse weights are used to adjust for institutions that did not respond to the survey. The sample for the second question ("Does your institution offer warnings?") includes 194 institutions that responded to the survey regarding their use of warnings. The sample of institutions assessing SAP each term is N = 148. The sample for the last question ("Does your institution have a formal appeals process for students who fail to meet SAP?") includes 220 institutions that responded to the survey about whether they had an appeals process.

FAA = financial aid administrator; IPEDS = Integrated Postsecondary Education Data System; SAP = satisfactory academic progress.

Exhibit C.14. Reasons for appeal approvals and denials

	Percentage
Which of the following are considered valid reasons to approve an appeal?	
Student injury or illness	100.0
Death of a relative	99.3
Mental health challenges	97.7
Victim of crime or domestic violence	96.6
Family issues	96.3
Housing instability or homelessness	94.9
Disability or need for accommodations	92.3
Military service or deployment	92.2
Natural disaster or emergency	91.7
Employment issues	84.4
Loss of childcare	81.6
Interpersonal issues	79.0
Financial challenges	78.7
Food insecurity	77.4
Difficulty balancing school with other responsibilities	76.9
Foster care involvement or aging out of foster care	68.9
Other	1.4
What are the most common reasons why appeals are denied?	
Insufficient reason for appeal	88.0
Missing supplemental documentation	68.9
Incomplete appeal form or paperwork	59.5
Missed appeal deadline	24.6
Multiple appeals submitted without progress	8.7
Other appeal denial reason	7.2
Appeal submitted to wrong office or process	0.9

Source: FAA survey.

Notes: The sample for the first question includes 220 institutions that responded to the survey about reasons to approve and appeal and the sample for the second question includes 219 institutions that responded to the survey about typical reasons appeals were denied. Nonresponse weights are used to adjust for institutions that did not respond to the survey.

FAA = financial aid administrator.

Exhibit C.15. Appeal policies

	Percentage
Do you limit the number of times a student's SAP appeal can be approved during their enrollment at your institution?	
Yes	26.6
No	73.4
If so, how many times do you allow a student to appeal after failing to meet SAP?	
Once	13.4
Twice	29.3
Three times	28.3
Four times	1.5
Five times	3.0
Appeals are unlimited	1.1
Depends on circumstances	23.3
Does your institution conduct a second-level review of denied appeals?	
Yes, automatically	15.1
Yes, upon student request	46.1
No	33.7
Other	5.1
Can students appeal in any term after failing to meet SAP?	
Yes, students can appeal in any term	67.6
No, students must appeal within a specific time frame	31.4
Other	1.0

Source: FAA survey.

Notes: The sample includes 220 institutions that responded to the survey, with the exception of the second question ("If so, how many times do you allow a student to appeal after failing to meet SAP?"). This item was only asked of institutions that indicated they limit the number of SAP appeals that can be approved during a student's enrollment. Accordingly, the sample for this item is N = 55 institutions that reported imposing such a limit and responded to this survey item. Nonresponse weights are used to adjust for institutions that did not respond to the survey.

FAA = financial aid administrator; SAP = satisfactory academic progress.

Exhibit C.16. Academic plans

	Overall (percentage)	2-year (percentage)	4-year public (percentage)	4-year private (percentage)
Does your institution use academic plans for students who successfully appeal?				
Yes, for all students who successfully appeal	61.1	62.5	58.0	63.8
Yes, but only for students who cannot meet SAP by the next evaluation period	25.3	26.1	26.7	21.2
No	5.8	5.2	9.1	1.3
Other	7.8	6.2	6.2	13.7

Source: FAA survey and IPEDS 2023–24 Institutional Characteristics component.

Notes: The sample includes 220 institutions that responded to the survey (80 2-year institutions, 103 4-year public institutions, and 37 4-year private institutions). Nonresponse weights are used to adjust for institutions that did not respond to the survey.

FAA = financial aid administrator; IPEDS = Integrated Postsecondary Education Data System; SAP = satisfactory academic progress.

Exhibit C.17. Communication about SAP

	Overall (percentage)	2-year (percentage)	4-year public (percentage)	4-year private (percentage)
At what times do students receive general information on SAP requirements?				
Near the beginning of the term or earlier	97.2	96.2	98.2	97.2
When students are notified of their Title IV financial aid eligibility	77.2	86.9	67.3	76.4
During new student orientation	61.5	64.6	68.6	43.3
At admission or enrollment	37.4	37.1	25.9	58.6
At the start of each term	21.2	22.0	21.8	18.7
After failing to meet SAP	89.1	89.1	87.9	91.5
When notified of being at risk of failing to meet SAP	74.3	73.6	76.3	72.3
At the end of each term	35.0	47.6	30.1	19.8
Mid-semester	10.3	12.5	12.2	3.0
Other	8.3	6.7	10.3	7.7
After students are evaluated for SAP, which types of results do you share back with them?				
Notice of meeting SAP requirements	39.9	57.8	36.0	12.9
Notice of currently meeting SAP requirements, but being at risk of failing to meet one or more SAP requirements	68.3	76.4	66.6	55.9
Notice of failing to meet SAP requirements	100.0	100.0	100.0	100.0
How do students typically receive general information on SAP requirements?				
Institution website	93.5	91.3	95.9	93.1
Email notification	84.7	91.5	80.2	79.9
Student portal	64.7	76.5	63.3	45.0
1:1 meeting with advisory or financial aid staff	56.4	58.7	51.6	60.3
New student orientation	55.4	56.3	62.3	41.6
Student handbook	54.3	61.7	37.2	70.8
Course catalog	53.8	57.1	44.8	63.7
Financial aid offer	50.9	60.8	30.7	68.1
Text message	10.1	12.8	12.8	0.0
Paper mailing	8.4	4.9	12.4	8.1
Other	8.3	7.2	11.1	5.4
Faculty syllabi	2.0	2.7	2.2	0.0

Source: FAA survey and IPEDS 2023–24 Institutional Characteristics component.

Notes: The sample includes 220 institutions that responded to the survey (80 2-year institutions, 103 4-year public institutions, and 37 4-year private institutions). Nonresponse weights are used to adjust for institutions that did not respond to the survey.

FAA = financial aid administrator; IPEDS = Integrated Postsecondary Education Data System; SAP = satisfactory academic progress.

Exhibit C.18. Supports for students

	Percentage
For students who are notified they are at risk of failing to meet SAP requirements, what additional support services or resources are offered?	
Referral to academic advising	80.4
Peer tutoring	48.1
Referral to counseling or mental health services	45.3
Encouragement to attend regular drop-in office hours with faculty	43.7
Referral to accessibility or disability services	40.9
Referral to basic needs support	35.5
Academic skills workshops	31.6
Professional tutoring services	30.4
Financial literacy counseling	19.4
Scheduled 1:1 time with faculty outside of regular office hours	19.3
No additional supports are offered	13.5
Referral to career services	10.3
Other	7.1
What supports are available for students when filing an appeal?	
1:1 meeting with financial aid advisor or counselor	84.5
List of circumstances the institution would consider valid for approving an appeal	75.4
List of documentation required to support appeal	75.4
1:1 meeting with academic advisor	75.1
Template for appeal letter or form	67.3
Self-attestation option when documentation is difficult to obtain	33.4
Workshops on how to complete appeal	8.7
Appeal information available in multiple languages	3.5
Other	3.2
Does your institution's financial aid office help monitor students' academic performance outside of regular SAP evaluations to identify at-risk students?	
No	80.7
Yes	19.3

Source: FAA survey.

Notes: The first question ("For students who are notified they are at risk of failing to meet SAP requirements, what additional support services or resources are offered?") was asked only of institutions that indicated in a prior survey item that they notify students who are at risk of failing to meet one or more SAP requirements. Accordingly, the sample for this question is the 148 institutions that reported providing such notifications. The second question ("What supports are available for students when filing an appeal?") is based on the 220 institutions that responded to the survey. The third question ("Does your institution's financial aid office help monitor students' academic performance outside of regular SAP evaluations to identify at-risk students?") is based on the 219 institutions that responded to both the survey and this question.

FAA = financial aid administrator; SAP = satisfactory academic progress.

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