

Dear President's Council,

The revisions on the attached policy are necessary as the U.S. Department of Education held negotiated rulemaking sessions with members of the community to address issues related to integrity of the Title IV programs Nov 2009 to Jan 2010. Comment period ended August 2, 2010, resulting in final regulations published Oct 29, 2010; Campuses are required to have a revised policy in place effective July 1, 2011 for aid year 2011-2012.

For coherence, the attached policy has many text and formatting changes, making it difficult to see the substantive changes that are being suggested. To facilitate that process, I have summarized the substantive changes from our 2008 policy below. Whenever possible, CI is interpreting federal guidelines to offer the greatest benefit for students.

1. As required by federal mandate, this revised SAP policy continues to be at least as strict as the academic requirements for non-recipients of federal student aid.
2. The policy must provide for the consistent application of standards to all students within categories of students. In this revision, categories of students have been delineated.
3. If an institution has a "warning period" (which this policy proposes CI has as it benefits students) SAP must be evaluated at the end of each term (not annually). Without term evaluations, the institution cannot offer financial aid until student is placed on financial aid probation. Probation is the result of a student who fails to make SAP and who has appealed and has had eligibility reinstated.
4. The policy must specify the "pace" (new terminology) at which a student must progress through the educational program to ensure that the student will complete within the maximum timeframe.
 - Pace must be measured at each evaluation.
 - Pace is calculated by dividing the cumulative number of hours successfully completed by the cumulative hours attempted.
 - i. Remedial courses may be excluded and as it provides more opportunity for financial aid for students, this draft policy excludes remedial courses.
5. Credit from transferred courses must count for both attempted and completed hours.
6. The policy must provide that the student loses federal student aid eligibility at the time of evaluation if GPA or pace requirements are not met; however, they do have access to an appeals process, which is delineated.
7. The regulations include a new term "financial aid probation", which stipulates that the student may continue to receive federal student aid for one probationary payment period after failing to make SAP.
8. Since this policy proposes that CI allows for appeals, CI's SAP policy must address the appeals process.

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