



Satisfactory Academic Progress (SAP) for Students in Receipt of US Federal Student Aid

Note: this document outlines the requirements for students to retain eligibility for US Federal Student Aid only. This is subject to, and separate from, University of Edinburgh Regulations

Contents

Context, Authority and Interaction with the University Regulations	3
General Eligibility Requirements	3
Who is Assessed for SAP?	3
When is SAP Assessed?	4
SAP Requirements	4
1) Maximum Timeframe	5
2) Quantitative Measure (Pace)	6
3) Qualitative Measure (GPA)	6
Recognition of Prior Learning	7
Summary: Results Used for Each SAP Assessment	8
Incomplete Grades	8
Professional Judgement	9
Not Meeting SAP Requirements	10
Step 1: Federal Aid Warning	10
Step 2: Termination of Federal Aid Eligibility	10
Step 3: SAP Appeal	11
Step 4: SAP Probation	12
Step 5: Regaining Federal Aid Eligibility	11
Remediation	12

Retrospective SAP Assessments 13

Related Policies and Websites..... 13

Contact Details 13

Appendix 1: Definition of Terms..... 14

Appendix 2: Professional Judgement and SAP Assessments 15

Context, Authority and Interaction with the University Regulations

In order for universities to participate in the US Federal Student Aid programmes, they must ensure compliance with Satisfactory Academic Progress (SAP) requirements, which all US Federal Aid recipients must meet. SAP requirements are determined by the university but are required to be as strict as or stricter than the SAP requirements policy guidelines outlined by the Code of Federal Regulations, Title 34 CFR 668.34.²

The University of Edinburgh understands the SAP requirement within the context of the university's academic regulations and its with the student's best interests in mind.

Any remediation or other compensation mechanisms available within The University of Edinburgh's existing assessment / grading framework are subject to the [University of Edinburgh Academic Regulations](#) and are outside the scope of the US Federal Aid SAP requirements. The University of Edinburgh's SAP requirements are limited to determining whether a student is eligible for US Federal Student Aid.

A student who does not meet SAP may still be eligible to complete their programme as a self-funded student, including the use of private educational loans through external providers

General Eligibility Requirements

Before SAP can be considered, the following eligibility criteria must be met for a student to receive US Federal Student Aid:

1. The University of Edinburgh programme must be approved by US Education Department as eligible for US Federal Student Aid and may not include any elements that would make the programme ineligible for Federal Aid, such as:
 - a. Online or distance teaching and learning.
 - b. More than 25% of the programme spent at an ineligible partner organisation.
2. The student must be enrolled in not less than 50% of the full-time credit enrolment for the given semester. Typically, full-time enrolment is counted as 60 credits per semester; thus a student may not be enrolled in fewer than 30 credits per semester.

A detailed breakdown of eligibility criteria is provided on the following website:
<https://www.ed.ac.uk/student-funding/financial-support/student-loans/usa/continuing-students>

Any academic plan, including those drawn up as part of a student's SAP probation, must meet the above criteria if a student is to retain eligibility for US Federal Aid.

Who is Assessed for SAP?

All US Federal Aid recipients are assessed for SAP if they are enrolled in any taught programme, including:

- Undergraduate Bachelors Programmes
- Graduate Entry Medicine and Veterinary Medicine
- Taught Masters Programmes

The following are exempt from SAP assessments, but the University of Edinburgh retains the right to exercise Professional Judgment with regards to research programmes to determine that a student is no longer eligible for Federal Aid if they have prolonged their programme beyond 150% of the advertised programme length and/or have not passed their annual progression review

- Masters by Research
- PhD by Research.

When is SAP Assessed?

SAP is assessed by the Scholarships and Student Funding Manager and the Scholarships and Student Funding Team Leader (interchangeably referred to as the “financial aid administrator”), with input from the relevant College and/or School Programme Office.

SAP is assessed at the following points:

- At the end of each Payment Period, when the relevant exam results are released.
- At the point of application by the student for US Federal Student Aid

SAP assessments consider both the most recent payment period and a student’s overall academic record. Thus any retrospective changes to a student’s record may impact the current SAP assessment. However, SAP assessments are deemed to be final if they are made based on full and accurate information at the time of assessment. A retrospective change to a student’s record will not impact disbursements made prior to the SAP assessment, unless it is found that the prior SAP assessment was based on false, misleading or inaccurate information.

SAP Requirements

The University of Edinburgh SAP requirements are designed to ensure that students only receive US Federal Aid if they are progressing satisfactorily towards the completion of their programme. SAP requirements must be understood within the context of the programme structure, including whether a programme is part- time or full-time and what the official programme structure dictates for the standard credit load for each semester.

SAP assessments will take into account all prior academic results, including periods for which a student has not received US Federal Student Aid.

Minimum SAP Requirements

At each SAP Assessment, the student’s academic record is assessed for at least the following three requirements:

- 1) Maximum Timeframe:** It must be possible for the student to complete the programme within 150% of the advertised programme length.
- 2) Quantitative Measure (Pace):** Within any given semester, at least 67% of the *standard credit load* for that programme must be passed.
- 3) Qualitative Measure (GPA):** The Stage GPA may not be lower than 2.0 out of 4.0, and/or a D weighted average for a single semester for an Undergraduate student or 2.7 out of 4.0 and/or a C weighted average for a single semester for a Taught Postgraduate student

1) Maximum Timeframe

It must be possible for the student to complete the programme within 150% of the advertised programme length.

Each programme has an advertised programme length/timeframe. Unless otherwise indicated, this programme length is communicated to the student in the official the University of Edinburgh Offer Letter and the University of Edinburgh online programme catalogue.

A student's eligibility for US Federal Student Aid is terminated at the point that it is determined that it is impossible to complete the programme within 150% of the advertised programme length, not when the student reaches the 150% mark.

In general, the Quantitative and Qualitative measures are used as guidelines when measuring a student's progress relative to the maximum timeframe. However, the maximum timeframe also includes consideration of all graduation requirements, including core modules. For example, if a student fails a core module such that they will need to extend their programme beyond the maximum timeframe, then the student's results do not meet the SAP requirements even if they otherwise meet the Quantitative and Qualitative measures.

The maximum timeframe for each programme is determined by the programme length and number of credits awarded for a given degree, as illustrated in the table below. The information therein is indicative and for guideline purposes only. If it is determined that the student is unable to complete their programme within the allowed timeframe and without exceeding the credit limit, the student's eligibility for US Federal Aid will be terminated.

Standard Published Programme Length	Credits	Maximum UofE Period of Registration	Maximum Federal Timeframe for Completion
4-year undergraduate degree	240 credits	4.5 Years	360 credits
5-year undergraduate degree	300 credits	6 years	450 credits
12-month postgraduate taught degree	180 credits	1.5 years / 18 months	270 credits
Postgraduate research degree (PhD)	N/A	4 years	N/A

Note: any academic periods when the student is not registered and/or an active student are counted towards the maximum timeframe. This includes approved Leave of Absence. However, any semester/period where the student is not in attendance is not assessed in relation to the Quantitative and Qualitative measures outlined below.

2) Quantitative Measure (Pace)

In order to meet the Maximum Timeframe requirement, the SAP assessment will check that a student has passed at least 67% of the normal credit load in a semester of their programme. For most programmes, this amounts to passing at least 40 out of 60 credits in a semester, but the assessment must take into account the standard credit load for that semester for the particular programme in

which the student is enrolled.

The Quantitative Measure is measured against the standard credit load for each semester as determined by the programme description. It does not consider the number of credits a student is actually enrolled to. Thus, if a student is only enrolled to 40 credits, where the normal credit load is 60 credits, the student must pass all 40 credits in order to meet the Quantitative Measure.

To calculate the pace for a student's results, the following formula is used:

$$[\text{Number of Credits Passed}] \div [\text{Standard Credit Load}] = \text{Pace}$$

For example, a student who passes 50 credits out of 60 has exceeded the 67% threshold. The pace requirement has been met because

$$50 \div 60 = 83\%$$

The quantitative measure includes all first attempts, resits, repeats and formal Recognition of Prior Learning (RPL; see below) for which the student has obtained a passing grade when calculating the percentage of credits passed.

3) Qualitative Measure (GPA)

The Stage GPA may not be lower than 2.0 out of 4.0, and/or a D weighted average for a single semester for an Undergraduate student or 2.7 out of 4.0 and/or a C weighted average for a single semester for an Taught Postgraduate student

The maximum mark a University of Edinburgh student can achieve is 100%. All modules are assigned an alphabetic grade:

Mark (%)	Grade	Description
90-100	A1	An excellent performance, satisfactory for a distinction
80-89	A2	An excellent performance, satisfactory for a distinction
70-79	A3	An excellent performance, satisfactory for a distinction
60-69	B	A very good performance
50-59	C	A good performance, satisfactory for a masters degree
40-49	D	A satisfactory performance for the diploma and certificate, but inadequate for a masters degree
30-39	E	Marginal Fail
20-29	F	Clear Fail
20-29	G	Bad Fail
0-9	H	Bad Fail

For the purposes of the SAP Assessment, **provisional grades** are manually calculated by the financial aid administrator at the end of each payment period. The provisional grade may differ from the stage

grade in that non-passing grades will be factored into the grade calculation.

At the end of each stage, a student's **stage grade** is calculated based on the passed modules. This stage grade is displayed on the student's online academic record. Failed modules are not included in the online stage grade calculation as it is assumed that students will re-sit or repeat these modules, as determined by the relevant School or College.

Recognition of Prior Learning

The University of Edinburgh has the capacity to grant formal Recognition of Prior Learning (RPL) where a limited number of credits completed at another institution may be counted towards the completion of a programme.

As RPL is usually expressed in terms of GPA neutral credits passed in a given stage of a programme, RPL credits will not count towards grade calculations but will be counted as part of the Quantitative Measure. Thus, a student who is granted 10 credits in RPL for Stage 2 will already be deemed to have passed at least 10 of the 60 credits normally required for that stage. When conducting the SAP assessment, the financial aid administrator must determine which semester the RPL credits count towards by comparing the number of all other credits taken against the normal credit load for each semester of that year.

Only in exceptional cases will RPL shorten the timeframe of a student's University of Edinburgh programme. In these cases, the new expected programme length is to be used for maximum timeframe calculations. For example, if a student receives RPL such that the University expects them to complete a 4-year programme within 3 years, this will be communicated in the student's offer letter or in the formal notification following an RPL application by the student. In this case, all maximum timeframe calculations will use 3 years to calculate the maximum timeframe (i.e. 4.5 years). The same logic applies to external transfer students who may be allowed to start their programme in Stage 2 or 3.

Summary: Results Used for Each SAP Assessment

Module type	Enrolment (Eligibility for Fed Aid only)	Credits Attempted	Grade	Pace
Graded First Attempts	Yes	Yes	Yes	Yes
Pass/Fail Only	Yes	Yes	No	Yes
Audited	No	No	No	No
Resits	No	Yes	Yes	Yes
Repeats	Yes (first repeat only)	Yes	Yes	Yes
Recognition of Prior Learning	No	Yes	No	Yes

Incomplete Grades

In some cases, a student may be unable to complete a module within a semester due to circumstances outside of their control. This is formally recognised by the University through the temporary award of "NS" grades. Students with NS grades may have up to two semesters to complete the module.

Where a student has NS, an initial SAP assessment will be conducted based on all completed grades

only. For the purposes of the Quantitative Measure (Pace), pace will be measured against the standard credit load minus the number of credits for which the student has received NS grades.

Once NS grades have been remediated (i.e. a final grade has been awarded), the results become retrospectively active. For the purposes of the SAP assessment, this may mean that a SAP warning could be retrospectively issued or rescinded depending on the final results awarded for NS grades. The University of Edinburgh will not retrospectively terminate a student's eligibility for Federal Aid on the basis of final grades entered for NS grades for a payment period for which a student has already received a disbursement. **However, it may use these results to determine that a student is no longer eligible for Federal Aid for all subsequent payment periods.**

For example, the standard credit load for a MA student in Stage 2, Spring Semester is 60 credits. A student has the following enrolment and results for this semester:

	Credits	Grade	Mark
Module 1	20	A1	95
Module 2	20	B	60
Module 3	10	A2	83
Module 4	10	NS	0
Total	60		

To calculate the Mark for the SAP assessment, the financial aid administrator looks at the results of modules 1, 2 and 3. This comes to a mark of 80. As this is larger than 40, this SAP requirement is met.

To calculate the student's pace, the financial aid administrator must first subtract the NS credits from the standard credit load. $60 - 10 = 50$. Pace is then calculated relative to 50 credits, i.e. $50 \div 60 = 83\%$. As this is greater than 67%, the pace requirement is met.

When this student completes the NS grade, she obtains a B for Module 4 (Mark 65). The financial aid administrator then recalculates the SAP assessment using the new grade. They find that the student's Mark is now 75, and the pace is $60 \div 60 = 100\%$

Professional Judgement

The University of Edinburgh retains the right to exercise Professional Judgment if it is determined that additional requirements should be considered when conducting an SAP assessment. Professional Judgment may not be used to mitigate or reduce any of the aforementioned SAP requirements. Professional Judgment is exercised in order to maintain a duty of care to the student through ensuring that they do not risk exceeding the maximum timeframe. If it is determined that a student's record is subject to additional requirements, then the financial aid administrator should take the following actions:

- The additional requirement should be discussed with the appropriate School or College Programme Office (henceforth, Programme Office) and Student Adviser.
- The additional requirement should be communicated in writing to the student no later than the beginning of the Payment Period from which that requirement will be assessed along with the rationale for the requirement.
- There should be a clear link between the additional requirement and supporting the student's progress to completion.

- Professional Judgement may not be used in any way that can be construed as discrimination along the lines of race, gender, ethnicity, national origin, sexual orientation or any other grounds that run contrary to the University's EDI Strategy

See Appendix 2 for an example of the application of Professional Judgement with regards to SAP assessments.

Not Meeting SAP Requirements

If a student's academic results do not meet any of the SAP requirements, then the following process is to be followed.

Step 1: Federal Aid Warning

The financial aid administrator will issue the student with a written Federal Aid Warning. Once a student receives a Federal Aid Warning, they have one Semester to meet the SAP requirements. The SAP warning will reference this document (*Satisfactory Academic Progress (SAP) for Students in Receipt of US Federal Student Aid*), and it will explain how the student's results have not met SAP. It will guide the student to contact the relevant Programme Office and student adviser to ensure that they have adequate support to meet the SAP requirements.

SAP warnings cannot be appealed, however, they may be rescinded if a student's results are changed based on further information provided by the School or College. For example, if the School updates a Null sit on the basis of a successful application for extenuating circumstances, then it is possible that the SAP warning may be rescinded.

Normally, SAP warnings are issued at the beginning of a semester, but they may be issued later than the start of a semester if a student applies for Federal Aid after the start of the semester.

If a student's results for the semester following a SAP Warning meet the SAP requirements again, then the student may continue to receive US Federal Aid. Students may receive multiple SAP warnings during a multi-year programme, so long as SAP warnings are not issued for two consecutive semesters.

Step 2: Termination of Federal Aid Eligibility

When a financial aid administrator determines that a student's record has not met the SAP requirements for two consecutive semesters, they must issue the student with a written notification of termination. The notification of termination must detail how the student's record has not met the SAP requirements and must inform students of the appeal process.

Unless there is a successful appeal (see Step 3), Federal Aid termination is final and applies to the remainder a student's programme. Students whose Federal Aid eligibility is terminated due to SAP may not receive Federal Aid for the remainder of their programme.

Normally, termination follows a SAP warning, but this is not necessary. For example, if a student does not receive US Federal Aid for the first year of their programme, their record will not be evaluated for SAP during that year. If they then later apply for US Federal Aid, the financial aid administrator will conduct SAP assessments for each of the prior semesters. If they find that they have failed to meet the SAP requirements for two consecutive semesters in the past, the financial aid administrator must terminate the student's Federal Aid eligibility and may not certify them for any future loans.

Step 3: SAP Appeal

Students may appeal the termination of Federal Aid eligibility due to failure to meet SAP. Appeals must be submitted not more than 10 days after the formal notification of termination has been sent to them. Appeals must be emailed to studentfunding@ed.ac.uk and may include supporting documentation relevant to the appeal.

Appeals will only be considered on the basis of extenuating circumstances. These should be substantiated through additional documentation and/or a formal application for Extenuating Circumstances through the relevant Programme Office. The SAP Appeals Committee's determination of extenuating circumstances is independent of the Programme Office's determination, but the SAP Appeals Committee may refer to the Programme Office's determination to inform its decision. The SAP Appeals Committee may arrive at a different conclusion to the Programme Office. Appeals which cannot sufficiently demonstrate extenuating circumstances will not be successful.

Within 3 weeks of receipt of an appeal, the financial aid administrator will convene an appeal committee. The appeal committee's composition will be dictated by the nature of the appeal, but in general the committee will comprise:

- A member of faculty or the Programme Office who can make decisions regarding the student's academic plan.
- A student adviser.
- A financial aid administrator.

In order for an appeal to be successful, two criteria must be met:

1. Extenuating circumstances: The SAP Appeals Committee must determine that the extenuating circumstances were such that the student would have been able to meet SAP requirements if the extenuating circumstances had not occurred.
2. Academic Plan: The committee must determine that the student will be able to meet SAP for all subsequent disbursements. This determination may include a bespoke academic plan which:
 - a. Has clear criteria that the student's future results can be assessed against.
 - b. Provides a module enrolment which allows the student to meet SAP requirements; OR
 - c. Details a new set of requirements relevant to the student's specific circumstances. These requirements must stipulate future Maximum Timeframe, Quantitative and Qualitative Measures.
 - d. The Academic Plan may include supplementary non-academic requirements aimed at supporting the student, such as regular meetings with the student adviser.

The SAP Appeals Committee's decision is final and may not be appealed. Following the committee meeting, the financial aid administrator will communicate the outcome to the student, including any academic plan (if the appeal is successful).

Step 4: SAP Probation

If a student's SAP appeal is successful, they will be placed on SAP Probation for the duration of one semester (or longer, if the SAP Appeals Committee determines non-standard SAP requirements are necessary). At the end of the SAP Probation semester, the financial aid administrator must determine

whether the student has successfully met the criteria stipulated in the academic plan. Failure to meet any of these criteria will result in immediate termination of the student's Federal Aid eligibility without the possibility of appeal, and for the remainder of the programme.

Step 5: Regaining Federal Aid Eligibility

Once a student successfully completes a SAP Probationary period, having met all stipulated criteria, they will regain full Federal Aid eligibility. All subsequent semesters will be assessed against the standard SAP requirements outlined in this document, unless otherwise determined by the SAP Appeals Committee academic plan. A Student may receive subsequent SAP Warnings after the SAP Probationary period is complete.

Remediation

Independent of any SAP considerations, the Programme Office may recommend steps the student must take to remediate failed modules. It is advised that the financial aid administrator is included in remediation deliberations so that remediation might allow the student to continue to be eligible for Federal Aid. However, the Programme Office is not obliged to recommend a plan for remediation with the student's Federal Aid eligibility in mind.

In certain cases, a formal Leave of Absence ("LOA") may be recommended by the Programme Office in consultation with the financial aid administrator. The student should be notified of any implications of an LOA on Federal Aid eligibility in advance. Students may not borrow Federal Aid loans while on an LOA. The time spent on a LOA continues to count towards the Maximum Timeframe.

Alternatively, a student may be required to enrol only to resit modules for a semester. Similar to a Leave of Absence, students may not receive any Federal Aid for any semester where they are not enrolled to at least 40 credits of new credits or first-time repeat credits. Where a student is not enrolled in sufficient new or first-time repeat credits, they may not receive Federal Aid for that semester, but SAP will still be assessed based on the credits taken during the affected semester.

Retrospective SAP Assessments

In cases where a student decides to start borrowing Federal Aid after the first year of a multi-year programme, it is possible that retrospective SAP assessments may be conducted for any semesters where a student has not received US Federal Aid.

A retrospective SAP Assessment may determine that the student's eligibility for Federal Aid was terminated in a previous year due to two successive semesters wherein the student's results did not meet any or all of the SAP requirements. Students may only appeal a retrospective termination of Federal Aid eligibility if their most recent semester academic results have been used to determine that their record does not meet the SAP requirements.

Note: The procedures and policies listed above are subject to change without advance notice based on changes to federal laws, federal regulations, or University policies. If changes are made, students must abide by the most current version of this document.

The SAP for Students on Federal Aid document is intended to be an overview of the policies and procedures that govern regulations pertaining to Satisfactory Academic Progress for Federal Aid. For further guidance on SAP principles and procedures please contact studentfunding@ed.ac.uk

Related Policies and Websites

- Federal Aid General Information and FAQs: <https://www.ed.ac.uk/student-funding/financial-support/student-loans/usa/faqs>
- Federal Aid Consumer Disclosures: <https://www.ed.ac.uk/student-funding/financial-support/student-loans/usa/policies>
- Academic Regulations: <https://www.ed.ac.uk/academic-services/policies-regulations/regulations/assessment-regulations/taught/section-e>
- Grading Guide: <https://www.ed.ac.uk/timetabling-examinations/exams/regulations/common-marking-scheme>
- Extenuating Advice procedures: <https://www.ed.ac.uk/student-administration/extensions-special-circumstances>
- General Information on Fees: <https://www.ed.ac.uk/tuition-fees>

Contact Details

Scholarships and Student Funding

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Edinburgh, EH8 9YL
UK
studentfunding@ed.ac.uk

Appendix 1: Definition of Terms

Note: All academic terminology in this document is defined in the University of Edinburgh Academic Regulations. The following only defines terms specific to the SAP requirements.

Federal Aid	Also referred to as Title IV funding and US Federal Student Aid. At UoE, this is limited to Direct Loans through the William D. Ford Direct Loan Program, in which the student borrows money from the US Government to cover the cost of education at an approved institution through an approved programme.
Financial Aid Administrator	A member of UoE staff responsible for the administration of Federal Aid at UoE. This includes the International Scholarships and Student Funding Manager and Scholarships and Student Funding Team Leader
Semester	An academic term, also known as a “semester”. Generally defined by the Academic Regulations, each specific Semester is defined by the Academic Calendar, provided online: https://www.ed.ac.uk/student-systems/key-dates
Payment Period	A period coinciding with a Semester during which a student may be eligible to receive one equal portion of the total Federal Aid loan amount certified for the academic year.
Disbursement	The payment of a portion of a student’s loans for the academic year. The disbursement date normally coincides with the start of the Semester. The disbursement specifically refers to the payment by the US Treasury into the UoE account and the allocation of these fees to the student’s UoE fee account. It is separate to the refund of excess fees to the student for living expenses, which takes place immediately after each disbursement.
SAP Assessment	The review of a student’s academic record in line with the SAP Requirements detailed in this document.
SAP Warning	The written warning issued to the student indicating that their academic results do not meet the SAP Requirements detailed in this document. Students have one semester to ensure that their results meet SAP following a SAP Warning.
Federal Aid Termination	The determination by the financial aid administrator that a student has lost eligibility for US Federal Aid due to the student’s academic results failing to meet SAP.
SAP Appeal	An appeal lodged by a student not more than 10 days after receiving a Federal Aid Termination. SAP Appeals must indicate extenuating circumstances which hindered a student’s ability to meet SAP.
SAP Probation	The period (normally a Semester) following a successful SAP Appeal during which a student must follow an academic plan and regain Federal Aid eligibility through meeting SAP requirements, including any additional requirements by the SAP Appeal committee.
Professional Judgement	The ability of a Federal Aid administrator to respond to relevant situational factors that may not be circumscribed by policy or procedure. Professional judgement may be used to refuse to originate a loan so long as it is applied within the limitations dictated in 34 CFR 685.301(8) .

Appendix 2: Professional Judgement and SAP Assessments

The financial aid administrator may use Professional Judgement to incorporate additional SAP requirements.

For example, STUDENT 1 is enrolled in a four-year programme. As dictated by this document, SAP is assessed at the end of each payment period. STUDENT 1 receives a SAP Warning after Stage 1 Autumn Semester, but meets SAP in the Spring Semester of the same stage. This pattern is repeated in Stage 2 and STUDENT 1's grade remains just above 40%. In addition, STUDENT 1 fails and needs to repeat one or more core modules.

At the end of the first attempt of Stage 2, STUDENT 1 will need to complete one core module in the following year to progress to Stage 2. The Programme Office determines that STUDENT 1 may register for a combination of Stage 2 and Stage 3 modules in the coming year. This means that they will display as repeating Stage 2 on the Student Record but may be able to progress normally if they pass all resits.

As part of the SAP assessment following Stage 2, the financial aid administrator contacts the relevant student adviser and Programme Office regarding STUDENT 1. Both are of the opinion that STUDENT 1 is struggling but admit that it is not strictly impossible for STUDENT 1 to meet SAP requirements going forward.

At this point, the financial aid administrator may decide to add one further SAP requirement for this student. This may include increasing the Grade requirement or the pace threshold for the upcoming payment period. Or it could stipulate that the student may not fail or withdraw from any of the Stage 2 modules during the upcoming year.

The financial aid administrator must then communicate these requirements to the student adviser and Programme Office, and must respond to any concerns they may have in writing. It should be agreed that this requirement best reflects the duty of care to the student. Once agreed, the requirement must be communicated to STUDENT 1.

If STUDENT 1 fails to meet this additional SAP requirement during the coming Payment Period, they may be placed on a SAP Warning, or it may be determined that STUDENT 1's eligibility for Federal Aid is terminated. The potential for termination must be communicated to STUDENT 1 at the same time that the additional SAP requirement is communicated to them.