Date: August 5, 1997

From: System Offices of Student Affairs and Academic Programs

Subject: C Average Requirement for State Financial Aid and General Audit Concerns

To: Presidents, State University of New York
Deans, Statutory Colleges

The purpose of this memorandum is two-fold: to provide information on the change in statute, effective Fall 1996, requiring that recipients of State student financial assistance have a cumulative C average after two academic years, and to share with campuses information regarding the results of audits recently conducted at State University campuses.

This change in policy was officially transmitted to campus presidents in September 1996 by the State Education Department (see attached CEO #96-11) and effectively supersedes the information contained in Memorandum to Presidents, Vol. 81 No. 7, issued in 1981.

I. C Average Requirement

Beginning with the 1996 Fall semester, students who have received the equivalent of two or more full years of State-funded student financial aid payments must have a cumulative GPA of 2.0 or its equivalent (a C average) to be eligible for subsequent State aid payments. Two years of State-funded student financial aid payments is defined as the accumulation of 24 or more payment points. (A student accumulates six payment points for each full semester of State aid received.)

Satisfactory Academic Progress Charts

In compliance with the change in statute, the undergraduate standards of satisfactory academic progress approved for the State University of New York and promulgated in Memorandum to Presidents, Vol. 81 No. 7 on April 24, 1981, were automatically amended by the State Education Department. A copy of the revised Satisfactory Academic Progress charts are attached. These revised charts, required to determine student eligibility for State financial aid awards, should be published in the college catalog and in documents concerning financial aid that are routinely provided to parents and students.
Transfer Students

In general, since only credits (but not grades) for courses in which a student earned a grade of C or better are normally accepted in a transfer situation, the student may be presumed to have met the C average requirement for the initial term of study at the new institution. An institution has the option of considering actual grades for credits accepted in the transfer to determine the student’s cumulative GPA for financial aid purposes. However, if this approach is used, it must be a general policy applied to all transfer students seeking financial aid.

If a student returns or is readmitted to an institution, the student’s cumulative GPA would be determined based on prior grades earned at the institution. If the student’s prior GPA is less than 2.0, the student is ineligible for the initial term upon return and must achieve a cumulative 2.0 in order to regain eligibility. If a returning or readmitted student has earned credits at another institution in the interim, the institution may consider the grades for courses accepted in the same manner as for transfer students.

Change of Program and Beneficial Placement

If a student did not have a cumulative 2.0 in the prior program of study, the student cannot regain eligibility and meet the 2.0 requirement by changing to a new program and ignoring certain courses/grades that are not applicable to the new program. Under these circumstances, the student would be ineligible for the first term in the new program. However, after the first term, only the courses applicable to the new program need be considered. A student with a GPA of 2.0 or better who changes programs is eligible. Beneficial placement applies differently to the C average requirement than to satisfactory academic progress.

A student who changes programs and is eligible to be repositioned for credit accrual on the Satisfactory Academic Progress chart (because fewer credits apply to the new program) must still meet the C average requirement if he/she has a total of 24 or more TAP payment points. That is, beneficial placement on the SAP chart, either by payments received or credits applicable to the degree (whichever is more beneficial to the student) does not apply to or change the requirement of a C average after four TAP payments. As soon as the student has 24 TAP payment points, he/she must meet the 2.0 cumulative GPA requirement regardless of the placement on the charts with respect to credits earned.

Regaining Eligibility

Unlike the regulations for good academic standing, the C average regulations have no provisions for regaining eligibility for State student aid by remaining out of school for a period of time (i.e., one year). Eligibility is regained in the conventional ways that a cumulative GPA is raised.
Waivers

The C average regulations allow an institution to waive this requirement for undue hardship. Undue hardship is defined as the death of the student's relative, the personal injury or illness of the student, or other extenuating circumstances as determined by the institution consistent with the criteria used to grant waivers of the Commissioner's requirements for good academic standing.

Unlike Satisfactory Academic Progress standard waivers, which may be granted only once, a waiver of the C average regulations may be granted more than once. When waivers are granted, the institution must maintain in the recipient's file documentation of its assessment and judgment to grant the waiver consistent with the procedures and documentation required for waivers of the good academic standing requirements.

II. General Audit Concerns and Items of Interest

Periodically, we inform campuses of the general results of audits conducted at State University campuses. This information is intended to advise campuses on potential problem areas and allow them to take the necessary action to avoid similar findings.

Approved Programs

Auditors have, on occasion, questioned whether certain programs in which students are enrolled are registered and approved for student aid purposes by the State Education Department. These questions arise when discrepancies exist between an offering identified in the college catalog or a curriculum listed on the student's transcript and the official listing in the Inventory of Registered Programs maintained by the State Education Department. Be sure that course names, course numbers and credit hours listed in the catalog match the entries on the official transcript and that programs listed on the transcript and in the catalog are identical with those listed on the SED Inventory. Discrepancies should be resolved by title changes or new program registration, as appropriate, made with the System Administration Office of the Provost and with the State Education Department.

Non-Credit Course Work and Good Academic Standing

The good academic standing regulations are made up of two parts: the pursuit of program in which the student is enrolled and satisfactory academic progress toward the completion of program requirements (Commissioner's Regulations Section 1452.2).

Program pursuit is defined as receiving a passing or failing grade in a certain percentage of a full-time course load. In accordance with Commissioner's Regulations, Section 1452.1, "...non-credit or remedial courses, may all be considered as contributing toward full-time or part-time study on an hour-for-hour equivalent basis, if the student effort required is the same as would be required for a credit-bearing course in conformity with subdivision (o) of section 50.1 of this Title..." Therefore, for program pursuit purposes, non-credit course work can be counted toward a full-time course load.
Satisfactory academic progress is defined as making acceptable progress toward the completion of the academic requirements of a program which leads to a degree or certificate by earning a minimum number of credits with a minimum GPA in each term an award is received. Those courses listed in the curriculum outline in the college catalog constitute the academic requirements for the degree. Non-credit or remedial courses, designed to prepare students with deficient educational backgrounds to compete successfully in a college level program, may not be included when determining satisfactory academic progress. Only courses granting academic credit in which the student earned a passing grade should be used when determining satisfactory academic progress.

Shared Audit Information

Be advised that the Office of the State Comptroller routinely shares copies of State audit findings with the U.S. Department of Education Regional Office in New York City. Institutions that experience an audit with a high number of findings or significant liability should be aware that the USDE Institutional Review Branch may review the findings and take appropriate action.

Good Practices and Recommendations

We agree with an audit recommendation that each campus maintain a centralized record of waivers given to students. In addition to the one-time waiver for program pursuit or satisfactory academic progress, waivers for the C average requirement should also be included. This procedure would ensure a clear audit trail.

We also agree with the recommendation that students who want to drop courses should be routinely advised that these actions could affect their eligibility for current or subsequent financial aid funding.

Questions or comments regarding the C Average requirement and related issues should be referred to John K. Curtice, Assistant Vice Chancellor for Student Affairs and Financial Aid Services, at (518) 443-5474 or via e-mail at UJKC@SYSADM.SUNY.EDU or Kathryn E. Van Arnam, Assistant Provost for Academic Programs, at (518) 443-5496 or via e-mail at VANARNKE@SYSADM.SUNY.EDU.

William F. Messner

William J. Murabito

Attachments

Copies for information to:
President Coll, Alfred University
Provost Randel, Cornell University
STANDARD OF SATISFACTORY ACADEMIC PROGRESS FOR PURPOSE OF DETERMINING OF ELIGIBILITY FOR STUDENT AID
ALL CAMPUSES - STATE UNIVERSITY OF NEW YORK

Calendar: ___ Semester ___

| Programs: Baccalaureate Degree |

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Although non-credit remedial instruction can be counted toward a full-time course load, as set forth in 145-2.1 of the Commissioner's Regulations for Pursuit of Program, the number of credits in this chart refers to courses granting academic credit in which the student earned a passing grade which can be counted as credits completed toward the degree and it does not include remedial non-credit instruction.

6/19/97
STANDARD OF SATISFACTORY ACADEMIC PROGRESS FOR PURPOSE OF DETERMINING OF ELIGIBILITY FOR STUDENT AID
ALL CAMPUSES - STATE UNIVERSITY OF NEW YORK

Calendar: Semester

Programs: Associate Degrees and Certificate Programs

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1 Applicable to associate's degrees requiring more than 64 semester hours for completion.

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6/19/97
September 5, 1996

CEO # 96-11

TO: Chief Executive Officers of Postsecondary Institutions in New York State

FROM: Jeanine L. Grinage, Acting Deputy Commissioner

SUBJECT: C Average Requirement for Financial Aid

The purpose of this memorandum is to provide guidance to postsecondary institutions for implementing the new statutory requirement that recipients of State student financial assistance have a C average after two academic years (24 payment points) in order to remain eligible for further awards.

As amended by Chapter 309 of the Laws of 1996, subparagraph (b) of subdivision (4) of section 661 of the Education Law requires that, to be eligible to receive payments, "a student having completed his or her second academic year, must have a cumulative C average or its equivalent. The president [of the Higher Education Services Corporation] may waive the requirement that the student have a cumulative C average or its equivalent for undue hardship based on: (i) the death of a relative of the student; (ii) the personal injury or illness of the student; or (iii) other extenuating circumstances . . . ."

At a meeting of the staff of the Interagency Task Force on Financial Aid, representatives from the Division of the Budget, the Office of the State Comptroller, the Higher Education Services Corporation, and the State Education Department reached agreement on the following issues related to this requirement:

1. The C average requirement applies to all general and academic performance awards included under Article 13 of the Education Law. (STAP is effectively excluded since the program is for non-credit remedial study only.)
2. The C average equals a 2.0 on a 4.0 scale as determined by the institution. Institutions with alternative grading systems where conversion to the C average cannot readily be made should submit an explanation to the State Education Department to demonstrate the equivalence of the alternative grading.

3. Two academic years is defined as 24 payment points exclusive of STAP points. The C average requirement applies after the student has used 24 payment points and is then seeking the fifth payment. A student who has never received TAP—e.g., out-of-state transfer students or students who initially did not meet the income criteria—have four semesters (or the equivalent) of payments to achieve the C average.

4. To determine the eligibility of transfer students, an institution may elect to include—for financial aid purposes—the grades earned for courses accepted in transfer providing this policy is applied to all financial aid applicants.

Since institutions generally accept only courses for which grades of C or better were earned, transfer students who have already used 24 payment points are assumed to meet the C average requirement and are eligible for the initial term at the new institution.

5. In order to minimize administrative burden, the undergraduate standards of satisfactory academic progress now approved for each institution will automatically be amended to conform with the statute. From the fifth payment onward, the minimum cumulative grade point average will be a 2.0. The requirements for payments two through four can remain the same, or an institution can submit a proposed revision to the State Education Department for approval.

If no change is proposed, the only action required for institutions with the standard chart of satisfactory academic progress showing minimum credits to be earned with a minimum grade point average will be to publish the revised chart with the new 2.0 cumulative grade point average requirement in the catalog or other documents concerning financial aid that are provided to students.

Institutions with atypical standards should submit an explanation to the State Education Department showing how compliance with the C average requirement will be demonstrated. (Although the C average requirement also applies to graduate awards, no approved standard has a minimum grade point average lower than 2.25.)
6. The C average waiver that may be granted by the President of the Higher Education Services Corporation is in addition to the waiver of good academic standing requirements permitted under section 145-2.2(b)(5) of the Regulations of the Commissioner of Education. Regulations and further guidance about the C average waiver (more than one waiver may be possible) will be forthcoming from the Higher Education Services Corporation.

For additional information or clarification about academic issues related to the C average requirement, please contact Ms. Jeremy Weis at (518) 474-2593. Ms. Weis' E-mail address is JWEIS@HIGHER.NYSED.GOV. Information to be provided to the State Education Department as noted above should be sent to Assistant Commissioner Barbara W. Flynn, Office of Quality Assurance, State Education Department, Cultural Education Center, Albany, New York 12230.

cc: Financial Aid Officer