JOHN BURTON Advocates for Youth

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Strengthening Satisfactory Academic Progress Practices Under AB 789

A Practitioner's Guide to Student-Centered Communication, Appeals, and Leveraging Institutional Resources

TABLE OF
Contents

ACKNOWLEDGMENTS 3

BACKGROUND 4

ABOUT THIS GUIDE 6

IMPROVING READABILITY TO HELP STUDENTS UNDERSTAND SAP 7

USING TECHNOLOGY TO MAKE SAP INFORMATION EASIER TO FIND AND USE 10

ADMINISTERING APPEALS WITH CLARITY, CONSISTENCY, AND CARE 16

BUILDING ALIGNMENT AND SHARED RESPONSIBILITY FOR SAP ACROSS CAMPUS 22

LEVERAGING EXISTING STAFF CAPACITY TO SUSTAIN SAP IMPLEMENTATION 27

USING DATA TO STRENGTHEN SAP PRACTICE AND STUDENT SUPPORT 29

WORKING WITH THIRD-PARTY VENDORS TO SUPPORT SAP COMPLIANCE 31

CONCLUSION 33

APPENDIX A: SAMPLE SAP POLICY 34

APPENDIX B: SAMPLE SAP SELF-ATTESTATION FORM 37

Acknowledgments

Authored by Christina Lomeli, Dr. Zachary Taylor, and Karla Weber Wandel, with support from Jessica Petrass, this guide is intended as a resource to help California's institutions of higher education implement student-centered Satisfactory Academic Progress (SAP) policies in line with Assembly Bill 789 (2023). John Burton Advocates for Youth (JBAY) would like to thank the 16 representatives from California public colleges and universities who participated in JBAY's SAP Advisory Committee. Their time, expertise, and valuable insights were instrumental in shaping this guide.

The SAP Advisory Committee included representatives from the following institutions:

California Community Colleges: Cabrillo College, Cerro Coso Community College, Cuyamaca College, Cypress College, De Anza College, Fullerton College, Glendale Community College, Merced College, Ohlone College, and Shasta College.

California State University (CSU): California State Polytechnic University, Pomona; California State University Channel Islands; and California State University, Monterey Bay.

University of California (UC): University of California, Berkeley; University of California, Irvine; and University of California, Merced.

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Background

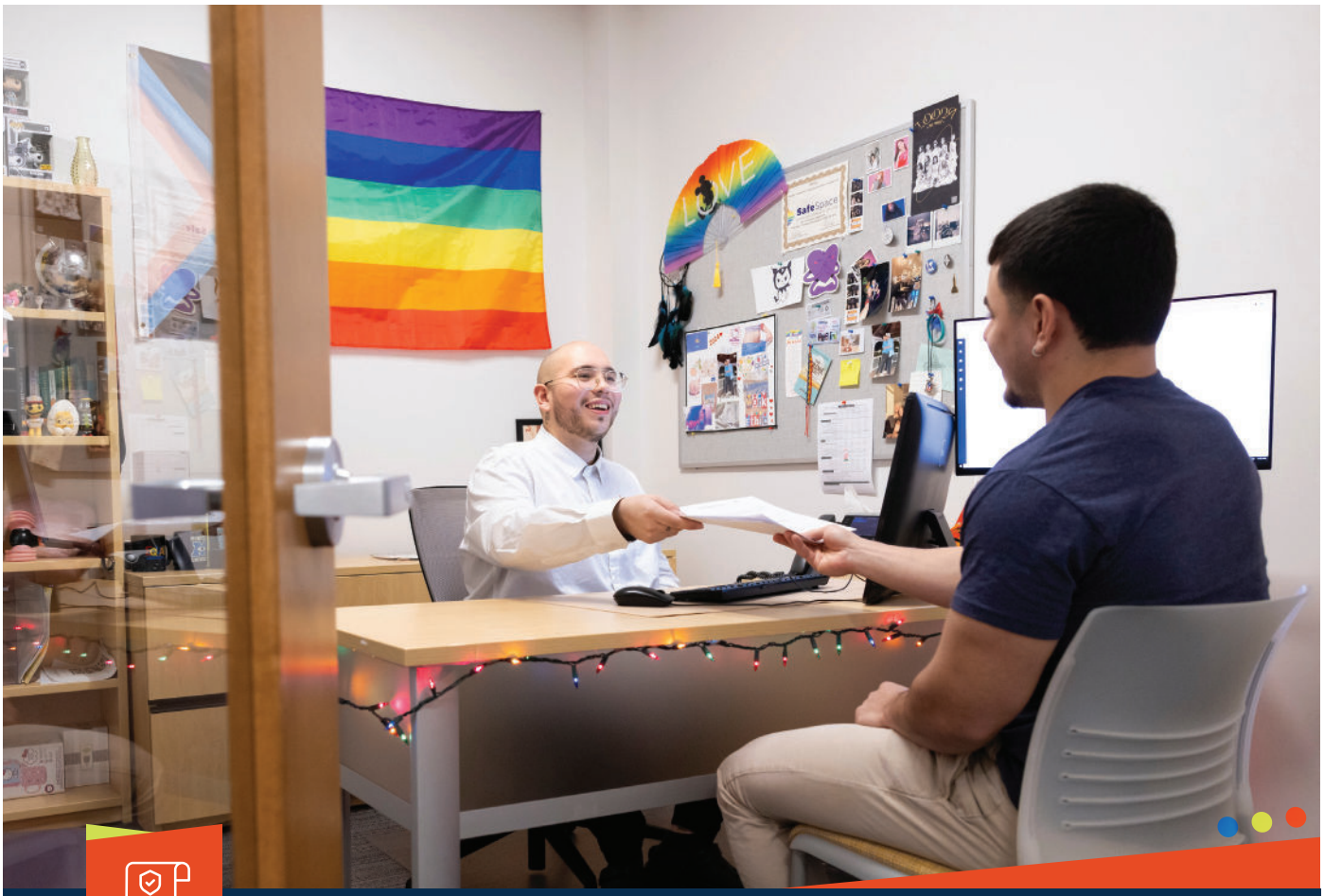
Satisfactory Academic Progress (SAP) policies can determine whether students retain the financial aid they need to remain enrolled, yet these policies have historically received limited attention from researchers and policymakers. In 2021, John Burton Advocates for Youth (JBAY) published The Overlooked Obstacle, research that helped illuminate the consequences: nearly one in four first-year, low-income California Community College students did not meet SAP during their first two consecutive semesters, jeopardizing their continued access to financial aid. Black and Native American students experienced financial aid disqualification due to SAP at approximately twice the rate of White and Asian students. For many students, losing financial aid contributes to disenrollment and creates a significant barrier to returning to college.

Following this publication, JBAY launched a yearlong Community of Practice (CoP) with 19 institutions to better understand the variation in SAP policies and their disparate impact on students from low-income and minoritized populations. Findings from the CoP informed JBAY's 2023 publication, The Overlooked Obstacle Part 2, which shaped the policy recommendations behind Assembly Bill (AB) 789.

In response to the disparities uncovered in JBAY's research, California enacted AB 789 in 2023, adding Education Code section 69432.7(l)(4), which imposes new SAP requirements on institutions that participate in the Cal Grant program. These provisions set minimum standards for assessing SAP, define which courses count toward maximum timeframe calculations, govern how SAP appeals are handled, and require institutions to inform students about SAP and their appeal options. Institutions were required to implement these provisions by the 2024–25 academic year to remain eligible for the Cal Grant program. The law was designed to prevent institutions from imposing requirements more restrictive than federal standards, expand access to SAP appeals, and ensure that students receive clearer information and a meaningful opportunity to retain or regain financial aid.

In April 2024, JBAY published Removing Obstacles: A Toolkit for Implementing AB 789 Satisfactory Academic Progress Requirements. The toolkit explains AB 789's requirements and provides resources to help institutions develop student-friendly, equity-centered SAP policies and appeal processes.

Institutions can use JBAY's AB 789 Compliance Checklist to review these requirements and assess their implementation.



AB 789: ALIGNMENT WITH FEDERAL MINIMUM REQUIREMENTS

AB 789 was designed to align California SAP policies with federal minimum requirements. The law requires qualifying institutions to develop and implement SAP policies consistent with federal standards, while using flexibilities already available under federal law to remove unnecessary barriers for students. Proper implementation of AB 789 should therefore not, by itself, create a federal program review concern.

Institutions can use the **AB 789 Crosswalk with Federal Regulations** to identify how AB 789 provisions relate to federal requirements and where federal law permits institutional flexibility.

About This Guide

Building upon five years of research and JBAY's prior AB 789 Toolkit, this guide offers practical approaches to student communications, technology, SAP appeals, and leveraging existing staff resources and external supports to strengthen AB 789 implementation and SAP practices.

The recommendations in this guide draw from:



SAP ADVISORY COMMITTEE

JBAY convened 16 financial aid practitioners from across California's three segments of public higher education for a series of facilitated discussions from February to May 2026. Participants reflected on AB 789 implementation and shared promising practices related to student communication, appeals, staffing and office capacity, technology, and other aspects of SAP administration.



REVIEW OF INSTITUTIONAL SAP WEBSITES

JBAY analyzed the readability of SAP websites across California's three segments of public higher education from August through September 2026 to examine how SAP information is presented to students. Findings from this review inform the guide's recommendations related to readability.



SAP MINI-GRANT RECIPIENTS

From July 1, 2024, to June 30, 2025, six public postsecondary institutions in California received grants of up to $20,000 per campus from JBAY to implement innovative SAP policies and practices. Lessons from these grantees are highlighted throughout this guide.

Together, these sources provide complementary perspectives on AB 789 implementation: practitioner experience and mini-grant projects highlight how institutions are administering and strengthening SAP processes in practice, while the website review examines how those policies and processes are communicated to students.

Financial aid practitioners across California's three segments of public higher education consistently cited limited staffing, time, and resources as major barriers to strengthening SAP practices—constraints that affect institutions' ability to launch new communication strategies, maintain student-facing content, review appeals, coordinate across departments, and adopt or improve technology.

The guide does not prescribe a single institutional model. Instead, it offers practical strategies that institutions can adapt to their local context while maintaining alignment with state and federal requirements.

Improving Readability to Help Students Understand SAP



KEY TAKEAWAY

SAP policies should be written in clear, student-friendly language at approximately a 10th–12th grade reading level. Students should be able to quickly understand the standards, identify required actions, and know where to get help.

See Appendix A for a Sample SAP policy. This policy is written at a 10th grade reading level, is approximately 700 words, and fully complies with AB 789 requirements.

AB 789 requires institutions to include information about SAP and appeal policies on their websites and in financial aid offers using "student-friendly language." To assess how well institutions are meeting this requirement, JBAY analyzed the readability of SAP policies posted on the websites of all California public colleges and universities from August through September 2026.

The analysis found that many policies remain difficult to read because they use long and complex sentences, financial aid jargon, and dense explanations. Most SAP policies were written above a 14th grade reading level and averaged approximately 1,800 words. As a result, many SAP policies are difficult to understand for college students and their support networks, since the average adult reads at a 10th–12th grade level.

These communication barriers can make it harder for students to understand SAP requirements, recognize when their financial aid is at risk, and identify what they need to do next. The strategies below draw on that policy review and established readability practices to help institutions translate AB 789's student-friendly language requirement into practical changes to SAP policies and communications.



CAMPUS SPOTLIGHT
Feather River College: Making SAP Information Easier to Understand

Feather River College presents its SAP policy at a 9.7 grade reading level (Flesch-Kincaid) and supplements written information with digital tools and accessible videos to support student understanding. By combining more readable policy language with multiple ways for students to engage with SAP information, the college helps make complex financial aid requirements easier to follow and act on.

Explore Feather River College's SAP policy and videos (reviewed August 2026)

- ☑ **Write for a High School Reading Level (10th–12th Grade).** Use plain, student-friendly language that can be understood without prior financial aid knowledge. Avoid unnecessary technical wording.
- ☑ **Keep Individual Sentences to About 20 Words.** Shorter sentences make complex SAP requirements easier to process. Break long explanations into multiple sentences when necessary.
- ☑ **Use Simple Sentence Structure and Punctuation.** Limit commas, semicolons, colons, and complicated clauses. Straightforward sentence structures reduce the cognitive burden on students reading unfamiliar information.

- ☑ **Separate SAP Standards into Distinct Sections.** Present GPA, pace of completion, and maximum timeframe separately rather than describing SAP as a single overall standard. Use clear headings and explain each measure independently so students can easily identify the requirements and understand which standard they are or are not meeting.
- ☑ **Address Students Directly Using Second-Person Language.** Use words such as "you" and phrases such as "you can" or "you should." Direct language makes instructions clearer and helps students understand what actions apply to them.
- ☑ **Regularly Measure the Readability of SAP Materials.** Use tools such as Microsoft Word's Flesch-Kincaid Grade Level test to evaluate policies, notices, webpages, and other student-facing materials.
- ☑ **Replace or Clearly Define Financial Aid Jargon.** Avoid technical terms whenever a simpler phrase will work. When terms such as pace of completion, maximum timeframe, financial aid probation, or SAP appeal are necessary, provide definitions or accessible hover-text explanations.
- ☑ **Use Bullets for Steps and Required Actions.** Present sequential instructions, required documents, deadlines, and next steps as bulleted or numbered lists. Students should be able to quickly identify what they need to do without searching through dense paragraphs.



Using Technology to Make SAP Information Easier to Find and Use



KEY TAKEAWAY

Technology should make SAP information easier to find, navigate, and act on. Institutions should use websites, portals, communication tools, and digital systems to reduce navigation barriers, connect students directly to required actions, and create a consistent experience across platforms.

AB 789 requires institutions to provide student-friendly SAP information and clear access to appeal processes. Technology can either support that goal or stand in the way of it. When SAP information is spread across multiple webpages, hidden behind several navigation steps, or difficult to use on a mobile device, students may miss important requirements or deadlines. Institutions should therefore treat websites, portals, forms, and other digital systems as part of the SAP communication process. The strategies below focus on making SAP information easier to access and use.

CAMPUS SPOTLIGHT
Feather River College and Ohlone College: Centralizing SAP Information Online

Feather River College and Ohlone College provide centralized, web-accessible SAP webpages that bring key information about SAP requirements, policies, and the appeal process together in one location. By creating a primary landing page for SAP information, these institutions reduce the need for students to navigate across multiple webpages to understand requirements, locate appeal information, and identify next steps. This approach can make complex SAP information easier for students to find, understand, and act on.

View Feather River College's SAP webpage

View Ohlone College's SAP webpage

SAP Webpages and Digital Tools

- ☑ **Maintain One Primary SAP Landing Page.** Centralize student-facing SAP information on one clearly identified webpage. This reduces confusion and gives students, staff, and campus partners a consistent reference point.
- ☑ **Give Financial Aid Staff Website Editing Access.** Provide appropriate financial aid staff with permission to update SAP webpages and related catalog content. Time-sensitive deadlines, procedures, and policy changes should not depend on lengthy external approval processes.
- ☑ **Reduce Navigation Between Information and Action.** Minimize the number of webpages, menus, or institutional sites students must navigate to complete SAP-related tasks. Whenever possible, link directly to appeal forms, deadlines, status explanations, contact information, appointments, and other required actions.
- ☑ **Provide Student-Facing SAP Calculation Tools.** Offer SAP calculators or planning tools that help students understand how their academic performance may affect SAP eligibility, particularly pace of completion. Clearly explain that these tools provide guidance and do not replace official institutional determinations.

SEE IT IN PRACTICE: View Cerritos College's SAP Calculator.

☑ **Ensure SAP Digital Tools Are Mobile-Friendly.** Test SAP webpages, appeal forms, links, calculators, and other digital tools on smartphones and tablets as well as desktop computers. Students should be able to find information and complete essential SAP actions regardless of the device they use.

SEE IT IN PRACTICE: View a mobile-friendly SAP appeal form from Cerro Coso Community College.

Student Portals and Dashboards

☑ **Make the Student Portal a SAP Action Hub.** Use the existing student portal to communicate individualized SAP status, requirements, deadlines, and next steps. Pair each status with clear instructions and, whenever possible, allow students to move directly from notification to the required action.

☑ **Integrate Appeals into Secure Student Systems.** Allow students to submit appeals and supporting information through secure institutional platforms whenever possible, reducing the need to download, email, or independently locate sensitive forms. Provide immediate confirmation when an appeal has been successfully received.

☑ **Use Portal Alerts to Communicate SAP Status Proactively.** Consider notifying students as they approach GPA, pace, or maximum-timeframe thresholds so they have an opportunity to take action before losing eligibility. Institutions may also use the portal to confirm good standing and reinforce SAP expectations before problems arise.

☑ **Use Case Management Systems to Track SAP Appeals.** Where available, use the student portal, a customer relationship management (CRM) system, or other case management software, to track when appeals are received, review status, decisions, academic plans, deadlines, and follow-up requirements. Centralized tracking can improve continuity and reduce reliance on manual processes.

Communication Channels and System Alignment

No single communication channel will reach every student, so institutions should use multiple channels intentionally, matching each method to the type of information being shared and the action students need to take. Below is an overview of key practices for each type of communication channel.

COMMUNICATION CHANNEL	BEST USE	KEY PRACTICE
Email and Student Portal	Individualized status, with detailed explanations and next steps	Clear subject lines, concise messaging, direct links to instructions and forms
Text Messages	Time-sensitive reminders on key dates and deadlines	Brief messages with one essential link
In-person or Virtual Meetings	Complex and sensitive student situations	Personalized guidance and individualized assistance
Print Materials	General education	QR codes and short URLs shared at strategic campus locations and in-person events
Videos	General education	Short, accessible overviews with captions
Social Media	General education and reminders on key dates and deadlines	Reinforce – not replace – official communications, and ensure accessibility
Webinars	General trainings for students, staff, or faculty	Offer targeted trainings for the appropriate audience with accessible captions, live Q&A, and pre-recorded offerings for staff and faculty

- ☑ **Coordinate Communication Across Multiple Technology Platforms.** Use different systems according to their strengths, such as texts for short reminders and portals or email for detailed information. Regardless of channel, the underlying message and required action should remain consistent.
- ☑ **Use Short Videos and Walkthroughs for Complex Processes.** Create brief, topic-specific videos explaining SAP standards, status definitions, appeals, academic plans, or common SAP tasks. Screen-share walkthroughs can also show students how to navigate an online process.

SEE IT IN PRACTICE: View Shasta College's SAP Appeal Tutorial on finding and understanding its SAP policy.

CAMPUS SPOTLIGHT
Sierra College: Using Video to Make SAP Easier to Understand

Sierra College provides students with a brief SAP overview video that explains key SAP concepts in an easy-to-follow format. The video gives students another way to learn about SAP beyond written policies and webpages and can be shared across multiple communication channels.

Watch Sierra College's SAP Overview Video

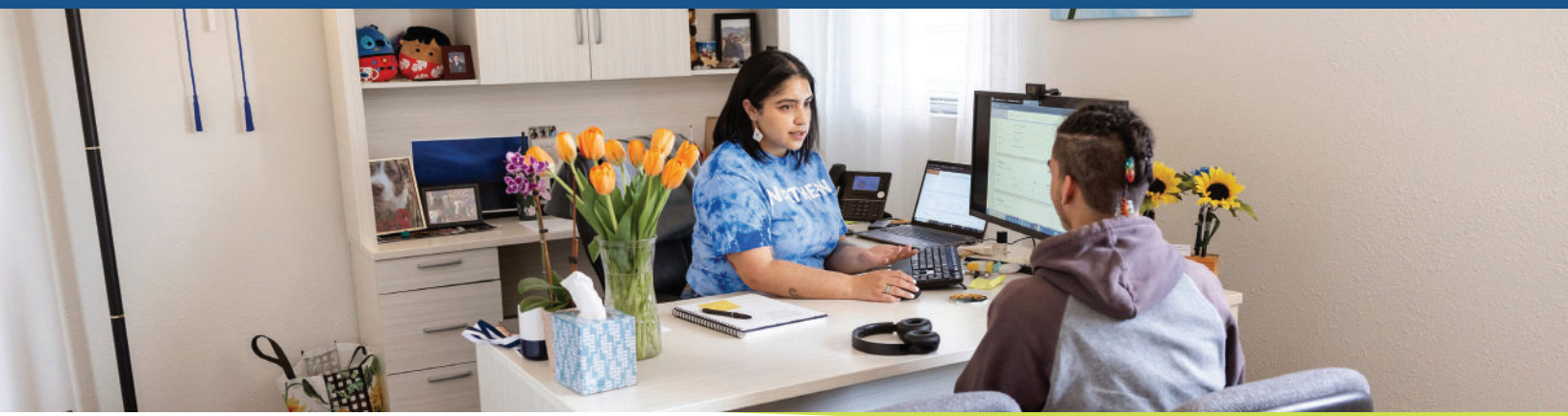
Want to use this video at your institution? Contact JBAY at info@jbay.org for help adapting it with your own institutional branding.

- ☑ **Reuse Digital Content Across Channels.** Develop videos and other resources that can be embedded or linked across webpages, emails, portals, webinars, and presentations rather than recreating the same explanation for each channel.
- ☑ **Test Digital Communications and Tools with Students.** Before launching new or substantially revised communications, portals, or digital tools, ask students to review them and explain what they believe the information means, what action it asks them to take, and whether they can easily complete that action. Use feedback to improve clarity, navigation, and usability.

- ☑ **Use Consistent SAP Terminology Across Systems.** Review webpages, student information systems, financial aid systems, portals, appeal platforms, email, and texting systems to ensure SAP statuses, definitions, deadlines, and instructions are consistent. Students should not encounter conflicting terminology or directions depending on the platform they use.
- ☑ **Test the SAP Journey Across Systems.** Periodically walk through common SAP processes from the student's perspective, such as receiving a status notification, following a link, locating appeal information, submitting an appeal, and confirming receipt. Identify unnecessary navigation, conflicting instructions, broken links, or other points where systems create barriers.



Administering Appeals with Clarity, Consistency, and Care



KEY TAKEAWAY

A strong SAP appeal process removes unnecessary barriers while maintaining consistent standards. Students should be able to easily navigate the process, meaningfully explain their circumstances, have their appeal evaluated on its substance, and clearly understand the decision and what happens next.

AB 789 establishes important protections to create consistent, accessible appeals processes that give students a meaningful opportunity to appeal the loss of financial aid eligibility. To keep the appeals process low-barrier, AB 789 standardizes how appeals are handled and requires that appeal information be easy to find on institutions' websites, easy to understand, and communicated proactively to students. It also ensures that completing an appeal does not require a burdensome amount of time or information from students. The following promising practices can help institutions reduce unnecessary barriers while gathering the information needed to make fair, individualized decisions and help students maintain or regain financial aid eligibility.

EARLY COMMUNICATION → **EASY ACCESS** → **ONGOING STATUS UPDATES** → **CONSISTENT REVIEWS & DECISIONS** → **CLEAR NEXT STEPS & LINKAGES TO SUPPORT**

Communicate SAP and Appeal Information Early and Clearly

☑ **Communicate Early and Reinforce Next Steps.** Students should encounter basic information about SAP policies and appeals processes before their financial aid is at risk. AB 789 requires institutions to include this information on their websites, financial aid awards letters, new student orientation, and request faculty to include information on course syllabi.

☑ **Make SAP Status Notifications Clear and Actionable.** AB 789 requires institutions to notify students who do not achieve SAP each term, regardless of the frequency of formal SAP evaluation. When notifying students of their current SAP status, explain why they received it, how it affects their financial aid, and what they should do next when action is required. Identify the specific SAP standard involved rather than requiring students to interpret institutional terminology or search multiple webpages for an explanation.

PRACTICE TIP

Request Faculty to Include SAP Policies in Their Syllabi: Sample Statement

YOUR GRADES MATTER! In order to continue to receive financial aid, you must meet the Satisfactory Academic Progress (SAP) requirements. Making SAP means that you are maintaining a 2.0 GPA, you have successfully completed 67% of your coursework, and you will graduate on time.

If you do not maintain SAP, you may lose your financial aid. If you have questions, please contact financial aid at:

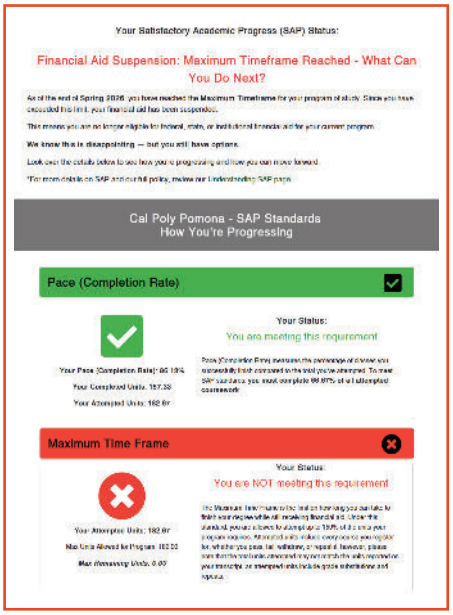
financialaid@testcollege.edu.

CAMPUS SPOTLIGHT

California State University (CSU) System: Turning SAP Status Notifications into a Path Forward

The CSU system developed student-facing SAP notifications tailored to different statuses, including good standing, warning, disqualification, and maximum timeframe. Written in strengths-based language, the notifications identify which SAP standard affects the student, explain what the status means for financial aid, and provide clear next steps and links to available resources.

Click here to view all CSU sample SAP notifications



☑ **Avoid Deficit-Based Language.** Avoid the word "fail" in SAP communications. For example, write "not meeting SAP" instead of saying "failing to meet SAP."

Make SAP Appeal Information Easy to Find and Complete

☑ **Make Appeal Information Easy to Find.** Make SAP appeal information available on the financial aid website without requiring students to sign in. Ensure the website, student portal, and SAP disqualification notice direct students to the same authoritative source.

☑ **Place Individual Appeal Tasks in the Student Portal.** When possible, place appeal requirements and instructions directly on the student's portal or to-do list. Students should not have to determine which form or process applies to them.

PRACTICE TIP: Test the Pathway

Ask someone unfamiliar with the process to locate the appeal from both the college homepage and a SAP disqualification notice. If it requires multiple searches, several links, or contacting the office simply to obtain the form, simplify the pathway.

☑ **Clearly Explain the Appeal Process and Requirements.** Tell students:

- who may appeal and what circumstances qualify
- what information to provide, based on three simple questions:
  1. What happened?
  2. What has changed?
  3. What is the path forward?
- when and how to submit an appeal
- what happens to their financial aid while the appeal is pending
- how long the review will take and how to request a second review
- where to get help

☑ **Provide Accessible Submission Options.** Provide both electronic and hard-copy submission options consistent with AB 789. Electronic forms should be mobile-friendly and, when possible, allow students to save their work, upload available documents, and review responses before submitting.

CAMPUS SPOTLIGHT
UC Merced: Helping Students Structure a Clear SAP Appeal

UC Merced provides students with clear, concise prompts to help structure their SAP appeal. Students are asked to explain the circumstances that prevented them from meeting SAP and their plan for improvement, with a 250-word limit for each response.

View UC Merced's SAP Appeal Instructions

- ☑ **Give Students an Opportunity to Update or Clarify Their Appeal.** When information is missing or unclear, tell the student specifically what is needed and provide an opportunity to clarify or complete the appeal before denying it. Avoid vague responses such as "insufficient documentation" or "incomplete appeal" without explaining what is missing.
- ☑ **Avoid Unnecessary Documentation Barriers.** AB 789 permits a signed student statement when documentation of certain special circumstances cannot reasonably be obtained.
  - » **See Appendix B for a sample SAP Self-Attestation Form**.

Keep Students Informed During the Review Process

- ☑ **Confirm Receipt of the Appeal.** Let students know when their appeal has been successfully received and provide an expected decision timeline. Students should not have to contact the financial aid office simply to verify that their appeal was received.
- ☑ **Make Appeal Status Easy to Track.** Explain how students will receive updates and, when possible, provide a way for them to check the status of their appeal without contacting the financial aid office.
- ☑ **Communicate Delays and Decisions Promptly.** Notify students if review will take longer than expected and communicate promptly once a decision has been issued. Timely communication helps students make informed decisions about enrollment, expenses, and other financial aid options.

Review Appeals Consistently and Holistically

- ☑ **Establish Consistent Appeal Review Practices.** Use written standard operating procedures (SOPs), standard review criteria, and staff training to promote consistency across reviewers. Procedures should address common decisions, including approvals, denials, and requests for additional information, while still allowing reviewers to consider each student's individual circumstances.
- ☑ **Evaluate the Substance of the Appeal.** Focus on the circumstances and information presented rather than the quality of the student's writing. Consider what affected the student's academic progress, what has changed, and whether there is a viable path forward.
- ☑ **Consider Writing Assistance and AI Use Separately from the Merits of the Appeal.** Students may use generative artificial intelligence (AI), translation tools, or other assistance to organize their thoughts, improve grammar, or draft an appeal. The use or suspected use of these tools should not, by itself, determine the outcome; when information appears inconsistent or unclear, ask the student to clarify the relevant facts.
- ☑ **Incorporate Multiple Perspectives on SAP Appeal Committees.** Consider including faculty and staff with relevant academic or student-support expertise in the appeal review process, particularly when additional context could support a more informed review. Cross-functional participation can also strengthen campus partners' understanding of SAP and further inform their student support practices.



CAMPUS SPOTLIGHT
UC Berkeley: Bringing Cross-Campus Expertise into SAP Appeal Review

UC Berkeley's SAP Appeals Committee brings financial aid staff together with rotating representatives from academic counseling and advising, the Disabled Students' Program (DSP), and the Educational Opportunity Program (EOP).

This cross-functional approach brings valuable academic and student-support perspectives into appeal reviews while giving campus partners a stronger understanding of SAP. Cross-campus participation can strengthen decision-making, improve referrals to other campus resources, and help partners better support students throughout the SAP process.

Clearly Communicate Decisions and Next Steps

- ☑ **Explain Every Appeal Decision Clearly.** Decision notices should identify the outcome and primary reason, explain how the decision affects financial aid, provide contact information for questions, and clearly identify what the student should do next.
- ☑ **Clearly Explain Requirements and Support Following Approval.** Identify any financial aid probation or academic plan requirements, explain how progress will be evaluated, and connect students with appropriate academic or student-support resources before the next SAP evaluation. Requirements should be individualized and tied to the student's academic circumstances.
- ☑ **Give Students a Clear Path Forward After a Denial.** Explain the reason for denial in student-friendly language, how to request a second review, and what additional information may be submitted. When applicable, explain other pathways for regaining financial aid eligibility.

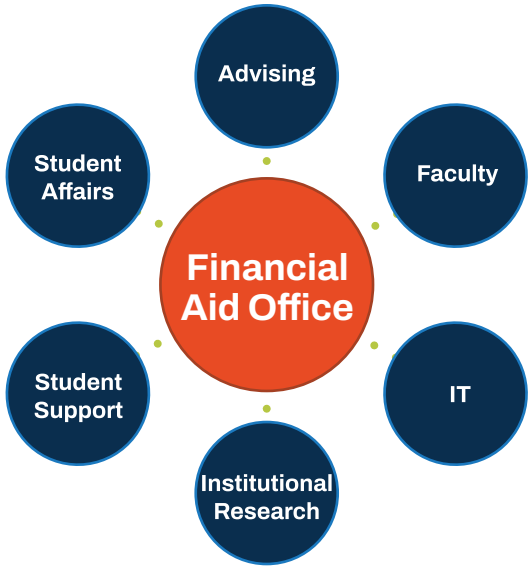


Building Alignment and Shared Responsibility for SAP Across Campus



KEY TAKEAWAY

SAP works best when it is treated as a shared institutional responsibility. The financial aid office should lead SAP compliance and serve as the primary source for detailed policy guidance and student-specific questions. Advising, faculty, student affairs, technology, institutional research, and other offices can support students by reinforcing accurate, consistent information, recognizing potential SAP concerns, and connecting students to financial aid when additional guidance is needed.



Meeting the expectations of AB 789 often requires coordination across offices that may use different systems, terminology, and processes. Institutions should therefore build shared ownership of SAP while keeping the financial aid office responsible for regulatory compliance. Cross-functional collaboration can reduce conflicting information, improve referrals, strengthen academic plans, and help students receive support before and after a SAP problem occurs.

Establish Shared Ownership and Clear Governance

- ☑ **Create a Cross-Functional SAP Implementation Team.** Include representatives from financial aid, admissions, orientation, advising, student affairs, counseling, housing, information technology, institutional research, faculty affairs, and other relevant offices. SAP implementation should be treated as a shared institutional responsibility rather than solely a financial aid function.
- ☑ **Assign Clear Responsibility for Each SAP Process Step.** Identify which office or staff role owns each stage of the SAP process, including communication, appeals, academic plans, referrals, system updates, and follow-up. Clear ownership reduces duplication and prevents students from being passed between offices.
- ☑ **Establish Shared Student Referral Procedures.** Define how financial aid staff refer students to advising, tutoring, wellness, basic needs, counseling, and other services, and how those offices refer students back when financial aid intervention is needed. Shared procedures make referrals more actionable and consistent.
- ☑ **Meet Before Each Major SAP Evaluation Cycle.** Convene the cross-functional SAP team at least annually before formal SAP evaluations begin. Use this meeting to review policy changes, communication plans, staffing concerns, system updates, and anticipated student needs.
- ☑ **Escalate Unresolved Inconsistencies to Institutional Leadership.** Develop a process for elevating policy, system, or procedural conflicts that cannot be resolved by operational staff. Leadership involvement may be necessary when inconsistencies span multiple offices or institutional systems.
- ☑ **Share Relevant Student Data Across Offices Appropriately.** When legally and institutionally permissible, share information that helps campus partners identify and support students approaching SAP concerns. Data-sharing practices should follow applicable privacy requirements and institutional policy.

Align SAP Policies, Terminology, and Communication

- ☑ **Establish Common SAP Terminology and Review Materials for Consistency.** Create agreed-upon definitions for key SAP terms and share them with staff across the institution. Regularly compare policies, webpages, forms, notices, training materials, and staff guidance to make sure they use the same terms and core information. Students should receive the same core information regardless of which office or resource they consult.
- ☑ **Clarify Similar Terms Used Across Different Offices.** Clarify potentially confusing terms such as "academic plan" versus "education plan" and "Satisfactory Academic Progress" versus "academic standing." Where possible, standardize terminology across systems and offices. Campus partners, especially academic advisors, should be able to explain these distinctions accurately to students.
- ☑ **Create a SAP Communication Calendar.** Develop a shared communication calendar so multiple offices do not overwhelm students with simultaneous or conflicting messages. Coordinate SAP outreach with other high-volume institutional communication periods.

Train Faculty and Student-Facing Staff on SAP

- ☑ **Cross-Train Student-Facing Staff, Especially Those Serving Students Facing the Greatest Barriers.** Provide foundational SAP training to student-facing departments such as admissions, orientation, student life, recreation, career services and counseling. Prioritize programs serving students with the greatest barriers, such as foster youth, basic needs, Black student achievement and first-generation student programs. Students often ask staff members financial aid questions before contacting the financial aid office.
- ☑ **Provide Faculty and Staff with Centralized SAP Training.** Consider creating an online SAP training resource, such as a learning management system (LMS) course, for faculty and staff. Include SAP regulations, status definitions, common student questions, referral guidance, and steps students can take to regain eligibility.
- ☑ **Provide Standardized Referral Scripts and Decision Tools.** Give campus partners short scripts, referral guides, or decision trees for common SAP situations. These tools help staff provide consistent guidance without expecting every employee to become a financial aid expert.
- ☑ **Offer Regular Opportunities to Ask Financial Aid Questions.** Establish recurring Q&A sessions or consultation opportunities between financial aid and campus partners. These sessions can address emerging questions and correct misinformation before they affect students.

Engage Campus Partners in Early SAP Education

- ☑ **Introduce SAP During New Student Orientation.** As required by AB 789, present basic SAP expectations during orientation, when many students first encounter institutional financial aid information. Include SAP information in orientation presentations and videos, and ensure multimedia materials are accessible.
- ☑ **Include Families and Student Support Networks When Appropriate.** Where institutional practice permits, introduce SAP concepts to parents, legal guardians, court-appointed liaisons, and other student support systems during orientation. Focus on helping support networks understand the importance of consistent academic progress for continued financial aid eligibility. For students with experience in foster care that may not have a support system, ensure targeted outreach to campus foster youth programs.
- ☑ **Reinforce SAP Expectations During the First Term.** Incorporate SAP information into first-year experience courses, summer bridge programs, student success programming, or other early-term touchpoints where appropriate. Repetition can help students understand SAP before they encounter an eligibility problem.

Partner with Academic Advising and Counseling

- ☑ **Provide Annual SAP Training for Advisors and Counselors.** Train advising and counseling staff on SAP policies and the appeal process. Ensure staff understand that financial aid SAP and academic standing are related but distinct processes. Update training when policies or procedures change.



CAMPUS SPOTLIGHT
UC Merced: Building Financial Aid and Academic Advising Partnerships

UC Merced's Financial Aid Office meets annually with academic advising staff to provide financial aid updates, answer questions, and create an opportunity for advisors to raise issues they are encountering with students. These recurring conversations help keep advisors informed as policies and procedures change and provide an important refresher as new and adjunct staff join the advising community. By intentionally maintaining this connection, financial aid staff can equip advisors with accurate information and clear referral guidance when financial aid and SAP questions arise. The collaboration helps reduce the potential for conflicting information across offices and supports students in receiving more complete and consistent guidance.

- ☑ **Train Advisors to Consider SAP When Recommending Course Loads.** Encourage advisors to consider whether proposed schedules are realistic for students on financial aid probation or academic plans. Course recommendations should support both degree progress and the student's ability to satisfy SAP requirements.
- ☑ **Define Ownership of Academic Plan Development.** Determine which office develops, approves, and monitors academic plans, particularly when advising capacity is limited. Responsibilities should be clear before students begin the appeal or probation process.
- ☑ **Align Academic Plans with Degree and SAP Requirements.** Review plans to ensure they support both progress toward the student's credential and the requirements necessary to regain or maintain financial aid eligibility.
- ☑ **Use Early Alert and Referral Systems for Emerging SAP Concerns.** Leverage existing early alert systems and referral processes to identify students who may benefit from financial aid outreach before a formal SAP issue occurs. Establish clear pathways for advisors and other campus partners to connect students with the financial aid office for timely support.



Leveraging Existing Staff Capacity to Sustain SAP Implementation



KEY TAKEAWAY

Limited staffing and resources can significantly affect an institution's capacity to administer SAP effectively. Institutions can strengthen existing operations by clarifying responsibilities, documenting processes, planning for peak workloads, and sharing responsibility for student support across the institution.

AB 789 adds important requirements for SAP communication, appeals, and student protections, but many financial aid offices must implement these changes within existing staffing, budget, and technology constraints. Sustainable implementation depends on how work is organized as much as the number of staff available. Institutions can strengthen SAP administration by assigning clear ownership, reducing dependence on individual employees, coordinating work with key institutional deadlines, and planning ahead for high-volume periods.

- ☑ **Assign Clear Ownership for Core SAP Functions.** Designate responsibility for system rules, communication triggers, appeals, and other recurring processes within the financial aid office. Clear ownership helps reduce gaps and duplicated work.
- ☑ **Document Processes and Build Backup Capacity.** Maintain written procedures and identify backup staff for essential functions such as communications, appeal processing, and system troubleshooting. This supports continuity when primary staff are unavailable or responsibilities change.

- ☑ **Review Policies and Procedures Throughout the Year.** Avoid relying on one large annual review of all policies and procedures. Schedule specific topics for review at appropriate points during the year.
- ☑ **Plan for Ongoing Communication Capacity.** Before adding websites, social media, or other communication tools, identify who will develop, maintain, and update the content. Account for ongoing staff time as well as accessibility and institutional marketing requirements.
- ☑ **Use Temporary or Reassigned Staffing During Peak Periods.** Assess whether temporary support or redistributed duties are needed during high-volume periods. Staffing adjustments can reduce processing delays and workload bottlenecks.
- ☑ **Involve Student Workers in Peer-Oriented Communication and Support.** Engage trained student workers in reviewing or developing student-facing content or assisting with SAP workshops when appropriate. Their perspective can improve relevance while extending office capacity.



CAMPUS SPOTLIGHT
Cabrillo College: Peer-to-Peer SAP Support

Cabrillo College trains student workers on SAP and engages them in providing peer support through in-person and virtual SAP workshops. Student workers help students talk through their appeals and supporting documentation, develop and promote workshop materials, and coordinate virtual sessions. Students have reported feeling more comfortable discussing SAP with a fellow student, and Cabrillo plans to continue expanding this peer-support model.



Using Data to Strengthen SAP Practice and Student Support



KEY TAKEAWAY

SAP data should be used to improve systems, target support, and reduce avoidable barriers. Financial aid offices should partner with Institutional Research (IR) and other campus departments to understand where students struggle, how processes perform, and whether outreach and support efforts are working.

FINANCIAL AID + **INSTITUTIONAL RESEARCH** + **CAMPUS DATA** = **IMPROVED STUDENT SUCCESS**

AB 789 creates new opportunities for institutions to examine how SAP policies and procedures affect students in practice. Data can help financial aid offices move beyond compliance checks and identify where students face the greatest barriers, where processing delays occur, and which forms of outreach or support are most effective. Partnership with IR can strengthen this work by helping financial aid offices identify appropriate measures, connect SAP data with other institutional data, disaggregate outcomes, and evaluate trends over time. Other campus partners, including advising, student support programs, information technology, and institutional effectiveness teams, may also hold data needed to understand the full student experience.

- ☑ **Partner with Institutional Research Early.** Engage IR when determining what SAP questions the institution wants to answer, what data are available, and how outcomes should be measured. Establishing shared definitions and measures at the outset can support more reliable analysis and reduce the burden on financial aid staff to conduct this work independently.
- ☑ **Identify the SAP Measures Creating the Greatest Risk.** Determine whether GPA, pace, maximum timeframe, or another SAP measure is most frequently associated with students losing eligibility. Use findings to target earlier communication and support and consider interim reviews or check-ins where they may help students take action before losing eligibility.
- ☑ **Disaggregate Data to Identify Inequities.** Partner with IR, when appropriate, to examine SAP processes and outcomes across relevant student groups and identify patterns that may indicate disproportionate barriers. Use findings to inform improvements in consistency, access, and equity.
- ☑ **Monitor Appeal Processes and Workload.** Track appeal volume, processing times, peak workload periods, and late, incomplete, or abandoned appeals. These patterns can help institutions identify workflow bottlenecks, communication or usability problems, and staffing needs.
- ☑ **Evaluate Student Engagement with SAP Communications.** Use available measures such as email opens, link clicks, text delivery, video views, and portal activity alongside student feedback on clarity and tone. Review these findings regularly to improve message content, timing, channels, and templates.
- ☑ **Evaluate Proactive Outreach and Support Strategies.** Examine whether students engage with early alerts, targeted outreach, or referred support services and, when possible, assess subsequent SAP or enrollment outcomes. Use findings to identify which strategies warrant continued or expanded investment.
- ☑ **Connect SAP Data Across Institutional Systems.** When possible, work with IR and other campus partners to connect financial aid data with relevant academic, enrollment, advising, and student-support information. Looking across systems can provide a fuller picture of where students encounter barriers and where institutional intervention may be most useful.
- ☑ **Establish a Regular Cycle for Reviewing SAP Data.** Do not limit analysis to an annual compliance review. Identify a manageable set of SAP indicators to review at regular intervals and use findings to inform policy, communication, staffing, and student-support decisions.
- ☑ **Use Data to Improve Systems, Not Blame Students.** Treat patterns in appeals, engagement, and outcomes as opportunities to examine and strengthen institutional processes. Data should be used to identify barriers and improve support, not to attribute implementation challenges solely to student behavior.

Working with Third-Party Vendors to Support SAP Compliance



KEY TAKEAWAY

Third-party vendors can support SAP administration, but they do not replace institutional responsibility. Colleges should regularly review vendor systems, policies, communications, and services to ensure they remain accurate, useful, and aligned with AB 789.

AB 789 places responsibility for SAP compliance on the institution, even when outside vendors support parts of the process. Financial aid offices may rely on vendors for policy management, compliance support, training, communication tools, portals, or other services that expand institutional capacity. These arrangements can be helpful, but they also create a need for ongoing oversight. Institutions should confirm that vendor-supported systems and practices continue to reflect current SAP requirements, institutional policies, and student communication needs.



- ☑ **Vet Vendors Before Contracting and Monitor Them Over Time.** Before entering into an agreement, review the vendor's practices, products, data handling, communication processes, and alignment with your SAP policies and AB 789. After contracting, designate a staff member or office to manage the vendor relationship and review any changes to portal features, communication templates, workflows, or other services that affect students. If a vendor edits, hosts, or maintains your SAP policies and procedures, set up a routine review to confirm they stay accurate and up to date.
- ☑ **Do Not Assume Vendor Practices Ensure Compliance.** A vendor's standard procedures may not automatically satisfy institutional, state, or system-level requirements. Institutions should independently verify that vendor-supported processes remain consistent with their own policies and AB 789 requirements.
- ☑ **Keep Policies and Procedures Easy to Update.** Ensure that SAP policies and procedures can be revised promptly whether they are maintained internally or through an external vendor. Institutions should avoid arrangements that make necessary policy changes difficult, delayed, or dependent on lengthy vendor processes.
- ☑ **Evaluate the Cost and Value of External Support.** Consider whether vendor services provide sufficient operational, compliance, or student-support value relative to their cost. Budget limitations, existing contracts, implementation requirements, and available internal capacity should all be considered when determining whether external support is appropriate.

Conclusion



AB 789 established an important foundation for strengthening SAP policies and ensuring that students have a meaningful opportunity to maintain or regain financial aid eligibility. As institutions move beyond initial compliance, the next step is making sure these protections show up in practices students can understand, access, and act on.

The practices in this guide demonstrate that strengthening SAP is not the responsibility of financial aid offices alone. Readable policies, accessible information, effective technology, clear and equitable appeal processes, and coordinated support across campus all contribute to a better student experience. Behind the scenes, making the most of existing staff capacity, using data to identify barriers, and holding vendors accountable help sustain that work over time. Improvements do not have to happen all at once. Institutions can use the strategies in this guide to identify changes that are most feasible for them and build upon them over time.

Ultimately, SAP should serve not only as a measure of financial aid eligibility, but also as a signal that a student may need information, guidance, or support. By regularly examining how SAP policies and processes work in practice, institutions can reduce unnecessary barriers while maintaining appropriate standards, helping more students stay enrolled, and make progress toward their educational goals.

Appendix A: Sample SAP Policy

Satisfactory Academic Progress (SAP) & Financial Aid Policy

To maintain eligibility for financial aid, you must make Satisfactory Academic Progress (SAP) toward completing your degree. We evaluate your SAP **[once a year or each term].**

The Three Main Requirements of SAP

To stay eligible for most types of financial aid, you must meet these three basic standards:

1. **Grade Point Average (GPA):** You must maintain a cumulative GPA of 2.0 or higher.
2. **Pace of Completion:** You must successfully complete at least 67% of all cumulative credits you try.
3. **Maximum Timeframe:** You can only receive financial aid for up to 150% of the published length of your program. Talk with your academic advisor if you are unsure how long your program is.

Special Course Rules

- **Remedial Coursework:** Remedial classes are excluded and do not count toward your maximum timeframe limit. Talk with your academic advisor if you are unsure what courses count.
- **Transfer Credits:** When we calculate your maximum timeframe, we only count transfer credits that apply to your current major. Talk with your academic advisor if you are unsure what courses count as transfer credits.

Contact Us About SAP

If you have any questions about your financial aid eligibility, please contact our office:

[Contact Information, including physical address, email, phone, and virtual option (if available)]

How We Check and Share Your SAP

- **Term-by-Term Review:** We check your grades after every term of enrollment. If you fall below the standards, we will notify you right away.
- **Cumulative Evaluation:** We look at your overall (cumulative) progress instead of requiring you to meet these standards for each individual term. We will not cancel your aid for one bad term unless you are already on probation.
- **Broad Communication:** We share this policy during new student orientation, on our website, and in financial aid letters. We also ask faculty to include it in course syllabi.

The SAP Appeals Process

If you lose your financial aid eligibility, you have the right to appeal.

- **Re-entering Students:** If you left the school while ineligible for financial aid, you can appeal immediately upon returning so you can qualify for financial aid during your first term back.
- **Fair Deadlines:** You can submit an appeal during any subsequent term of enrollment, and deadlines will never be earlier than three weeks before the end of the term.
- **Submit Online or on Paper:** You can submit your appeal electronically or on paper.
- **No Appeal Limits:** There is no limit to the total number of appeals you can submit during your enrollment.

Valid Reasons to Appeal

We consider a broad range of special circumstances. These include, but are not limited to:

- Death of a relative or another significant person
- Injury or illness, including mental health conditions
- Pregnancy or the birth of a child
- Homelessness
- Loss of childcare or transportation
- Loss or change in your job
- Being a victim of a crime, even if not officially reported
- Natural disasters
- Changing your major

Appeal Regulations

1. **Waiver of Proof:** We recommend turning in documents to support your appeal. However, if you cannot get proof, you can sign a statement swearing that your story is true.
2. **Decision Within 45 Days:** We will review your appeal and notify you of the decision within 45 days.
3. **Not Dropped:** We will not drop you from your classes for unpaid bills while your appeal is pending.
4. **Second Review:** If we deny your appeal, you can request a second review. A reviewer who did not participate in the first review will conduct the second review.
5. **No Past Financial Aid:** Approved appeals apply only to the approved term and future eligible terms.

Financial Aid Probation and Academic Plans

If your appeal is approved, you will be put on Financial Aid Probation. As long as you follow the academic plan you set with your advisor, you will keep receiving your financial aid term by term. This remains true even if you have not yet fully resolved your overall GPA or pace issues.

Contact Us About SAP

If you have any questions about your financial aid eligibility, please contact our office:

[Contact Information, including physical address, email, phone, and virtual option (if available)]

Appendix B: Sample SAP Self-Attestation Form

Please check off the circumstances beyond your control that prevented you from maintaining Satisfactory Academic Progress (SAP). If available, attach supporting documentation to your circumstances. **If you cannot provide documentation, please provide a written explanation below.** If you need additional space, attach typed sheets to this form. The list below does not cover every possible circumstance. If your circumstance is not captured in the reasons below, please indicate "other" and specify the reason.

- ☐ Death of a relative or other significant person
- ☐ Injury or illness, including behavioral health conditions (e.g., mental health or substance use disorder) of the student, a relative, or other significant person
- ☐ Pregnancy or birth of a child
- ☐ Homelessness
- ☐ Loss of childcare
- ☐ Loss or change in employment
- ☐ Loss of access to personal or public transportation
- ☐ Natural disaster
- ☐ Change of major
- ☐ Being a victim of a serious crime, including domestic abuse
- ☐ Other (please specify): _____

Written Explanation: (If you need additional space, attach typed sheets to this form.)

Student's Signature:_____ Date:_____

Return this form and any additional documentation to **[insert email here]** or in person at **[insert financial aid office information here]**

JOHN BURTON
Advocates
for Youth

About John Burton Advocates for Youth

John Burton Advocates for Youth improves the quality of life for youth in California who have been in foster care or homeless by **advocating for better laws, training communities** to strengthen local practices and **conducting research** to inform policy solutions.

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