

**34 CFR § 668.34 Satisfactory Academic Progress:
The Case for a Community-Owned Policy Evaluation**

A Position Paper

**By
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Introduction

Within this position paper, the argument is presented that we need to conduct a community-based racial equity impact evaluation of the financial aid satisfactory academic progress criteria. This is one specific way we can use a community-owned policy evaluation to investigate and ultimately reform the current code of federal regulations.

34 CFR § 668.34 Satisfactory Academic Progress

Federal policies have significantly contributed to the racial wealth gap which has been widening since 1980 (Derenoncourt et al., 2022; McGhee, 2021). At that time, President Ronald Reagan pushed the notorious “welfare queen” trope and implemented policies that harmed communities of color for generations and now serve as textbook examples of structural racism (e.g., the mandatory minimum sentences for crack cocaine) (Cammett, 2014). A lesser-known policy originating from the administration is 34 CFR § 668.34 Satisfactory Academic Progress (SAP) (Government Accountability Office, 1981).

This top-down legislation was passed by an almost exclusively White, male Congress and added purportedly race-neutral worthiness requirements to access financial aid (The Brookings Institution, 2022; Schudde & Scott-Clayton, 2016). More specifically the policy requires post-secondary institutions to use academic criteria (e.g., Grade Point Average - 2.0; Pace - complete 67% of courses attempted; and Timeframe – graduate within 150% of program length) to determine students' eligibility for both need-based (e.g., Pell grant) and non-need-based (e.g., unsubsidized loans) financial aid.

Enacting SAP was part of a larger movement of federal policy decisions that perpetuated racism in the U.S. and sought to eradicate financial aid for Black and low-income communities and defund public goods (Burt & Baber, 2018; Flint, 1991; McGhee, 2021). The policy’s criteria were based on White, middle to upper class, nondisabled circumstances in which families financially support students, and these metrics appear to have been relatively unquestioned for the past four decades. In part, as a consequence of these policies, a higher education gap remains which hinders Black and low-income individuals’ degree attainment and limits pathways to stable incomes and generational family and community wealth, health, and well-being (Martin et al., 2016; Raghupathi & Raghupathi, 2020; Tamborini et al., 2015; Zajacova & Lawrence, 2018). To date, a national equity evaluation has not been conducted on this gatekeeping mechanism.

The Biden Administration is committed to investigating and removing federal policies and procedures that hinder racial equity (Exec. Order No. 13985, 2021) and has prioritized the affordability of higher education through increases in Pell grant funding and loan forgiveness. As enforcement of the SAP policy continues to be more restrictive, impacting more students more quickly, it is with increasing urgency that a national racial equity evaluation be conducted on this gatekeeping mechanism (Brochet, 2020; Department of Education, 2010; Ocean, 2021; Schudde & Scott-Clayton, 2016; Scott-Clayton & Schudde, 2019).

Intergenerational Inequities

Financial aid policy is family policy (i.e., determining a student’s financial aid eligibility based on family income and circumstances) (Federal Student Aid, 2021). Expanding access to higher education funding for communities who have been systematically subject to marginalization and disinvestment could ultimately generate individual, familial, and communal prosperity and enhanced quality of life. The positive correlation between post-secondary educational attainment and life outcomes including income, health, well-being, and wealth are

well documented (Raghupathi & Raghupathi, 2020; Tamborini et al., 2015; Thompson & Suarez, 2017; Zajacova & Lawrence, 2018). Individuals with a bachelor's degree or higher have the lowest rates of unemployment even during economic downturns, but the racial higher education gap means not all communities benefit equitably from this income stability (Martin et al., 2016; U.S. Bureau of Labor Statistics, 2022). Educational attainment consequently plays an important role in asset accumulation (Carlson & McChesney, 2015; Thompson & Suarez, 2017). The tax code furthers existing inequities by favoring those with higher incomes to create and maintain wealth (Ashman & Neumuller, 2020; Brown, 2021; Huang & Taylor, 2019). This type of cyclical inequity plays out in higher education, income, and wealth outcomes intergenerationally (Emmons et al., 2018). Correcting racial inequities in higher education attainment alone will not simultaneously eliminate financial disparities in the U.S., but it can help minimize them (Hanks et al., 2018; Sullivan et al., 2016).

Existing Research on SAP

Little is known about the prevalence of SAP ineligibility and its consequences (Ocean, 2021; Schudde & Scott-Clayton, 2016). When the SAP policy was enacted, there were a handful of empirical studies conducted at singular institutions. Researchers found students of all minoritized groups, including Black and disabled students, were significantly more likely not to meet the SAP criteria and be ineligible for financial aid; the researchers were reasonably concerned that denying aid to students who were historically underrepresented would only exacerbate inequities in higher education (Bennett & Grothe, 1982; Evans, 1985; McNair & Taylor, 1988). After these initial studies, there has been a decades long gap of any empirical investigations into the criteria and their impacts (Schudde & Scott-Clayton, 2016).

Based on recent research, the SAP policy appears to negatively impact a large proportion of students. Researchers found 34-40% of community college students did not meet the SAP criteria in their first semester and half of community college students, who are more likely to be Black and Latina/o/x, did not meet the SAP criteria by the end of their second year (Headlam et al., 2019, Schudde & Scott-Clayton, 2016; Scott-Clayton & Schudde, 2019). In qualitative research, students meeting and not meeting the SAP criteria differed on common poverty measures including access to resources to meet their needs, cultural capital to navigate systems, and feeling, encountering, and witnessing powerlessness (Ocean, 2021). Further, higher education professionals have described how the SAP policy has a disparate impact on racialized and disabled students, and students often do not understand the SAP criteria or compounding appeal process all of which can further marginalize already disenfranchised communities (Department of Education, 2010; Kerstein & Pastor, 1999; Ocean, 2017; Talusan & Franke, 2019; Siebenmorgen & McCullough, 1990). Ultimately, students who are not meeting the SAP criteria are more likely to stop attending college (Schudde & Scott-Clayton, 2016; Scott-Clayton & Schudde, 2019), with less than 1% completing a degree in four years in one sample (Headlam et al., 2019). This is not surprising because when students do not meet the SAP criteria, they cannot access financial aid, including the Pell grant, which is pivotal to educational credential completion (LaSota et al., 2022).

Only one study was found that used institutional SAP data and included a racial equity analysis, and its findings are concerning. Brochet (2020) found African American and Latina/o/x students most likely to be blocked from accessing financial aid due to the SAP policy at a community college in southern California, and students who lost access to aid were 50% less likely to continue their educations. This study documents that the SAP policy appears to

segregate opportunities to higher education by race/ethnicity and serves as a form of structural racism. Most quantitative studies however have either not reported on the race/ethnicity of students impacted by SAP (Headlam et al., 2019) or have used a proxy for SAP status (e.g., GPA and/or pace) rather than the actual institutional SAP classification (Schudde & Scott-Clayton, 2016; Scott-Clayton & Schudde, 2019).

Since their inception, there have been calls for the antiquated SAP criteria to be redesigned to fit modern students, programs, and institutions beyond traditional models (Baum, 2015; Porter, 2016). Financial aid policy and guidelines lack clarity, sometimes conflict, and can be challenging to implement. Consequently, there is a need for applied research in financial aid to enhance efficiency, student success, and ultimately life outcomes that will inform effective policy solutions (Flint, 1991; Gross, 2017; The Institute for Higher Education Policy, 1994; Scott-Clayton, 2015).

A Guiding Framework: Racial Equity Impact Evaluation

Equity assessments and evaluation are an evolving science prompted by community organizers to implement and reform policies with communities most impacted by said policies (de Souza Briggs & McGahey, 2022; Martín & Lewis, 2019). Drawing on existing racial equity impact assessments (Ashley et al., 2022; Keleher, 2009; Martín & Lewis, 2019; MITRE, 2021; Nelson & Brooks, 2016; Office of Management and Budget, 2021; Robertson & Graubard, 2020) and in order to develop community-informed and owned policy recommendations for the SAP criteria, I argue researchers need to intentionally apply a racial justice lens and the following principles of equitable evaluation: (1) engage the community to oversee and conduct the research; (2) select a policy to evaluate; (3) identify the historical context of the policy; (4) secure access to data disaggregated by race+; (5) conduct equity analyses focused on disparate access, impacts, and outcomes; (6) determine community-informed and evidence-based policy recommendations to advance racial equity; and (7) raise awareness to eliminate racial inequities.

Methodology: Community-Based Participatory Research

Community-based participatory research (CBPR) should serve as the overarching methodology to conduct a racial+ equity impact evaluation of SAP. CBPR is a collaborative research process that focuses on an area of inquiry that is important to the community and seeks to enact change (Morello-Frosch et al., 2012). Ideally the research coalition will intentionally shift the power to communities historically excluded from decision-making, focus directly on racial inequities, and work collaboratively to generate actionable evidence (Aldrige, 2015; Bell & Pahl, 2017; Expanding the Bench Team & Advisory Team 2019; Orr et al., 2021; Ruiz-Mallén, 2020). Engaging diverse stakeholders impacted by policy as active collaborators has the potential to develop community and evidence-informed policy to eradicate structural racism (Burt & Baber, 2018; Cammett, 2014; Martínez-Alemán, 2015; Miller, 1983). CBPR can be used to conduct all types of analyses including a secondary data analysis by drawing on an anti-oppressive frame, using multidirectional input from key constituency groups and trained researchers, and hosting the community members as the final decision makers within the constraints of the data (Funnell et al., 2020; Morello-Frosch et al., 2012; Potts & Brown, 2005).

Per the racial equity evaluation framework, the community-partnered coalition should be the foundation of the research. This centers the value of expanding who participates in policy analysis and successful scholarship collaborations. The coalition would ideally have experienced both privilege and marginalization. Members would have taken and taught remedial college

courses, have followed traditional and scenic educational pathways, and have navigated systems both created for them as well as to exclude them. Perhaps most importantly, the coalition should reflect the populations impacted by this policy including people who have not met SAP, have been Pell grant recipients, and who identify as Black, Latina/o/x, Queer, and disabled. Because the presence of diversity alone is insufficient, the coalition would need to build on existing partnerships to create an expansive environment for meaningful and authentic community engagement and contributions.

Data

There are many types of data that could inform this policy evaluation. For instance, the National Postsecondary Student Aid Study (NPSAS) included three SAP variables in 2016. The variables include financial aid warning (student not meeting one or more of SAP criteria and allowed one payment period to regain academic eligibility), financial aid probation (student not meeting one or more of SAP criteria and successfully appealed to reinstate aid for one payment period), or financial aid ineligibility (student not meeting one or more of SAP criteria and unable to access financial aid) (Federal Student Aid, 2021). The variables in this dataset could be used to develop a national picture, albeit one moment in time, to document the reach of the SAP policy and explore significant differences by student demographics. Similar to initial SAP studies, singular institutional data or data from multiple institutions could be used to document the impact of SAP on student trajectories and outcomes over time again with a focus on racial+ justice. Surveying financial aid administrators could also identify the cost of implementing the SAP policy, perceptions of the effectiveness of the policy, and recommendations for enhancing efficiency and equity related to SAP. Perhaps most importantly additional data could be gathered from the students, families, and communities impacted by the SAP policy as well as the general public to develop a comprehensive understanding and solutions for equitable paths forward.

Disseminating the Findings and Policy Recommendations

To translate research into policy action, the coalition should write a research report and a policy brief based on their findings. Leveraging the coalition's existing relationships, they can efficiently and effectively disseminate the research findings within higher education professional communities and public policy advocacy organizations including the Institute for College Access & Success, American Association of Community Colleges, and the Institute for Higher Education Policy. They could also share their recommendations with the racial justice organizations like the Poor People's Campaign, the NAACP, Unidos US, Demos, the Hispanic Federation as well as accreditation agencies including the Accrediting Commission for Community and Junior Colleges, Middle States Commission on Higher Education, among others. A sub-set of the coalition could request to meet and share the evidence-informed policy brief with the legislative aides of elected officials serving on the Senate Committee on Health, Education, Labor and Pensions and the House Committee on Education and Labor. Additionally, the coalition could seek an opportunity to testify before these committees to inform and guide legislators and share their work with the U.S. Department of Education and the White House Domestic Policy Council.

In line with the principles of equitable evaluation, the coalition could raise public awareness and advance racial justice by sharing the findings via public outlets. This could include reaching out to reporters who specialize in racial equity, higher education, and economic issues at news and professional outlets who can link to the policy brief and report within their

articles. The coalition could also seek interviews with podcasters, share their findings on social media, and submit op-eds including a call to action. Furthermore, the coalition should develop a manuscript and presentations for peer review to publish, present, and validate our findings within the scholarly community.

Conclusion

In truth, public policy significantly contributed to racism in the U.S., and it needs to be amended to eradicate it (Derenoncourt et al., 2022; McGhee, 2021; Weller & Roberts, 2021). No one policy can eliminate state sanctioned White supremacy due to the insidious nature of racism in America (Orr et al., 2021). However, I hypothesize that the SAP policy is a significant, veiled contributor to racial educational, financial, and well-being gaps. It is imperative to evaluate the reality of who has access to government funding for higher education and who is excluded. To avoid repeating mistakes of the past, community members need to be engaged in an equity evaluation and develop community-owned policy recommendations to move this nation equitably forward.

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