

Professional Judgment Policy

ROWAN UNIVERSITY POLICY

Title: *Professional Judgment Policy*

Subject: *Student Financial Aid*

Policy No: *SEM: 2017:01*

Applies: *Office of Student Financial Aid*

Issuing Authority: *President*

Responsible Officer: *Senior Vice President, Student Enrollment Management*

Adopted: *07/01/2015*

Last Revision: *05/18/2017*

Last Reviewed: *11/08/2015*

I. PURPOSE

The purpose of this policy is to outline when the Student Financial Aid Office may choose to exercise professional judgment to adjust either the cost of attendance or the data that determine the expected family contribution (EFC). Additionally, when the office may use professional judgment to override the student's dependency status to make a dependent student independent when situations warrant such action.

II. ACCOUNTABILITY

Under the direction of the President, the Senior Vice President for Strategic Enrollment management shall implement and ensure compliance with this policy.

III. APPLICABILITY

The policy applies to the staff within the office of Student Financial Aid on all campuses.

IV. DEFINITIONS

1. **Cost of Attendance (COA):** The cost in dollars, of a period of enrollment (such as an academic year). The COA for a student is an estimate of that student's educational expenses for the period of enrollment. Defining a student's COA is the first step in establishing a student's financial need. It sets the limit on the total need-based federal student aid a student may receive and is one of the components of the Pell Grant calculation.
2. **Expected Family Contribution (EFC):** The amount a student and the student's family may be reasonably expected to contribute toward the student's postsecondary education for the academic year.
3. **Free Application for Federal Student Aid (FAFSA):** The student aid application provided for under section 483 of the HEA, which is used to determine an applicant's eligibility for the federal student aid programs.
4. **Institutional Student Information Record (ISIR):** An electronic record that the Department transmits to an institution that includes an applicant's FAFSA information; personal identification information; and EFC.

5. **Student Aid Report (SAR):** A report provided to an applicant by the Department showing the applicant's FAFSA information and the amount of his or her EFC. SARs are the paper or electronic (eSAR) output documents that are sent to students or printed from the FAFSA on the Web and FAA Access to CPS Online Web sites. SARs and ISIRs contain the same processed student information in different formats.

V. REFERENCES

1. [HEA Sec. 479A\(a\)](#) IN GENERAL—Nothing in this part shall be interpreted as limiting the authority of the financial aid administrator, on the basis of adequate documentation, to make adjustments on a case-by-case basis to the cost of attendance or the values of the data items required to calculate the expected student or parent contribution (or both) to allow for treatment of an individual eligible applicant with special circumstances. However, this authority shall not be construed to permit aid administrators to deviate from the contributions expected in the absence of special circumstances.
2. Additional federal guidance is available in the Dear Colleague Letters and in the FSA Handbook, Application and Verification Guide (AVG). This information is available on the [IFAP](#) website.

VI. POLICY

1. The FAFSA applies a consistent formula to measure the applicant's financial resources based on prior year income and family size. However, some family situations will require extra discretion on the financial aid office's part. To account for special circumstances of a student, our office may choose to exercise professional judgment (PJ) to adjust either the cost of attendance or the data that determine the expected family contribution (EFC). Additionally, our office may use professional judgment to override the student's dependency status to make a dependent student independent when situations warrant such action.
2. Exercising Professional Judgment is optional and no regulations require an office to make specific adjustments. The financial aid office decision regarding adjustments is final and cannot be appealed to the Department.
3. An aid administrator may use professional judgment on a case-by-case basis only to adjust the student's cost of attendance or the data used to calculate the EFC. This adjustment is valid only at the school making it.
4. The reason for the adjustment **must be documented** (by a third party if possible) in the student's file, and it must relate to the special circumstances that differentiate the student—not to conditions that exist for a whole class of students. Rowan University is held accountable for all professional judgment decisions and for fully documenting each decision.
5. The student and aid administrator must resolve any inconsistent or conflicting information shown on the ISIR output document **before** making any adjustments.
6. The data elements that are adjusted must relate to the student's special circumstances.
7. The statute states that nothing within it shall be construed as limiting the authority of aid administrators to make data adjustments for some situations. However, the law gives some examples of special circumstances, such as elementary or secondary school tuition, medical or dental or nursing home expenses not covered by insurance, unusually high child care costs, being homeless or a dislocated worker, recent unemployment of a family member, or other changes in the family's income or assets. Use of professional judgment is neither limited to nor required for the situations mentioned.
8. Prohibited Use
 - a. Professional Judgment may not be used to waive general student eligibility requirements or to circumvent the intent of the law or regulations. Nor can it be used to include post-enrollment

activity expenses in the student's COA. For example, professional licensing costs to be incurred after the enrollment period would not be includable; though one-time licensing costs incurred during the enrollment period may be included.

- b. This policy does not allow for decisions contrary to the professional judgment provision's intent. These "unreasonable" judgments include, for example, the reduction of EFCs based on recurring costs such as vacation expenses, tithing expenses, and standard living expenses (related to utilities, credit card expenses, children's allowances, and the like). Aid administrators must make "reasonable" decisions that support the intent of the provision.

9. Verification must be Completed Prior to Professional Judgment

- a. A student whose FAFSA information is selected for verification is required to complete verification before the institution exercises any authority under section 479A(a) of the HEA to make changes to the applicant's cost of attendance or to the values of the data items required to calculate the EFC.

10. Deadline for Student to Submit Required Documentation

- a. Students are encouraged to submit documentation as soon as possible. Students requesting adjustments under this policy must submit all required documentation and signatures before March 15 of the current award year.

11. Consequences of Missing the Deadline to Submit Documentation

- a. Students who fail to submit timely the documentation necessary to complete the adjustments may forfeit the benefits of adjustments to their financial aid (both federal and state).

12. Referral of Fraud Cases

- a. If the aid administrator suspects that a student, employee, or other individual has misreported information or altered documentation to fraudulently obtain federal funds, it should be reported along with any evidence to the Office of Inspector General.