

Minding Your P's and J's:
Professional Judgment
Overview and Case Studies



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US Department of Education

MDHE Default Day
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Federal Student Aid
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Agenda

- What is Professional Judgment?
- How and why is it exercised?
- Documentation
- Special rules
- Resources

- Case studies for discussion

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Overview

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What is Professional Judgment (PJ)?

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.

-HEA Sec. 479A(a)



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-HEA Sec. 479A(a)



Why PJ?

Special circumstances

- Elementary or secondary school tuition
- Unreimbursed medical or dental expenses
- Recent unemployment or underemployment
- Roth IRA conversion
- Other circumstances that impact a family's financial situation and ability to pay for college



Why PJ?

Professional Judgment is not limited to the listed special circumstances, nor is it *required*.

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Types of PJ

- Cost of Attendance adjustments
- Adjusting data elements of the EFC calculation
 - Income or asset information
 - Income or Asset Protection Allowances
 - Number in household or in college
 - Means-tested benefits
- Dependency Overrides

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Types of PJ

- Accommodating parent refusal to complete the FAFSA and to provide support
 - Unsubsidized Direct Loans only
- Denying or reducing a Direct Loan

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PJ Limitations

- Professional Judgment may not be exercised to...
 - Apply to categories or groups of students
 - Apply to multiple award years
 - Change the EFC or EFC formula directly
 - Waive student eligibility requirements
 - Make an independent student dependent
 - Make a student independent based on self-sufficiency
 - Circumvent the regulations or law

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Policies and Procedures

- Does the school exercise PJ?
- How does a student or parent request PJ?
- Does the school exercise PJ *only* upon request?
- How are PJ decisions at other schools treated for transfer students?
- Who makes PJ decisions?

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Documentation

- Professional Judgment decisions should be well-documented
 - Do decisions follow school policies and procedures?
 - Would an auditor or program reviewer understand each decision and consider it reasonable?
 - Is backup documentation obtained from students and parents as appropriate?
 - Copies of medical bills
 - Notice of layoff
 - Investment firm confirmation of Roth IRA conversion

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Special Rules

- Verification must be completed, and conflicting information resolved, *prior* to exercising PJ
- “EFC adjustment requested” flag should be checked when ISIR corrections are made
 - Prevents future selection for Verification

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References

- Federal Student Aid Handbook
 - *Application and Verification Guide, Chapter 5*
- Dear Colleague Letters
 - 08-12: *Parent refusal to support*
 - 11-07: *Denying or reducing Direct Loans*
 - 11-15: *Dependency Overrides*
- Higher Education Act and Code of Federal Regulations
 - *HEA sections 479A and 480(d)(7)*
 - *34 CFR 685.301(a)(8): Denying or reducing Direct Loans*

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Training Resources

- FSA Assessments
 - *Verification Activity 2: Dependency Overrides and Professional Judgment*
- Information for Financial Aid Professionals (IFAP) training site
 - *Recorded Professional Judgment trainings*
 - IFAP.ed.gov > Training and Conferences > Training > Specific Functions
 - <http://www2.ed.gov/offices/OSFAP/training/specific.html>

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Case Studies



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Reminder: Types of PJ

- *Cost of Attendance adjustments*
- *Adjusting data elements of the EFC calculation*
- *Dependency Overrides*
- *Accommodating parent refusal to complete the FAFSA and to provide support*
- *Denying or reducing a Direct Loan*

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Department of Education Contacts

Research and Customer Care Center
800.433.7327
fsa.customer.support@ed.gov



Reach FSA
855.FSA.4FAA -- 1 number to reach 10 contact centers!

Campus Based Call Center	eZ-Audit
COD	School Eligibility Service Group
CPS/SAIG	Foreign Schools Participation Division
NSLDS	Research and Customer Care Center
G5	Nelnet Total & Permanent
	Disability Team

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- Go to <https://s.zoomerang.com/s/DavidBartlett>
- This feedback tool will provide a means to educate and inform areas for improvement and support an effective process for “listening” to our customers
- Additional feedback about training can be directed to joann.borel@ed.gov; 409-579-3776

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Questions?

Contact me with follow-up questions about this session:
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