



**Professional  
Judgement – Could  
We? Should We?**

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**We Are All Super Heroes**  
**2019 PASFAA Spring Training**

# Agenda

- Can we use Professional Judgement (PJ)?
- When can we do so?
- What can we do?
- PJ and Unemployment Benefits
- What can't we do?
- Dependency overrides



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# Can we use PJ?

- HEA Sec. 479A(A) of the Education Act
- Student's need based on standardized assessment of family's financial strength relative to other applicants
- Unusual Circumstances can make this standardized approach unsuitable in individual cases



# When can we use PJ?

- Case-by-case basis
- Unusual situations
- Adjust only cost of attendance or data that determine the EFC
- Prior-prior year data



# Case-by-case basis

- Must relate to special circumstances that differentiate the student – not to conditions that exist for a whole class of students
- Must resolve inconsistent or conflicting information **before** making any PJ adjustments
- A financial aid administrator's decision is final and unappealable to the Department



# Unusual situations

- Examples provided by law
  - Elementary or secondary school tuition
  - Medical or dental or nursing home expenses not covered by insurance
  - High child care costs
  - Being homeless or a dislocated worker
  - Recent unemployment of a family member
  - Other changes to a family's income or assets



# Cost of attendance or EFC data elements

- Relative to student's special circumstances
- Income protection allowance (IPA) may already consider an expense
- Should be non-recurring costs



# Prior-prior year data

- Have you seen an increase in PJ cases?
- Two year old data
- Cannot perform auto PJ – individual only
- Which year's income do you use?
- Does anyone not do PJ's? If not, why not?





# What can we do?

- Subjective – not right or wrong, each case could have a different valid solution
- Individual case-by-case basis with a well-reasoned decision
- Document – document – document
- Resolve conflicting information first
- Complete verification, if selected, first



# Examples of PJ

- Change in income
- Illness
- Separation or divorce
- Unusual unreimbursed medical expenses
- Nonrecurring income or expenses
- Regular IRA to ROTH IRA



# What can't we do?

- Make an independent student according to statute a dependent student
- Waive general student eligibility requirements
- Circumvent the intent of the law or regulations
- Modify the formula or tables used to calculate EFC
- Change the COA with non/educational related expenses



# Dependency Overrides

- Documentation must support & include the reason – third party
- Unusual circumstances to grant override
- Use an override granted by another school in same award year
- Unallowed reasons





**2019-2020 Dependent Student Request for Revision**

Please Return To:  
 Office of Financial Assistance  
 Villanova University • 800 Lancaster Avenue • Villanova, PA 19085-1685  
 Phone: (610) 319-4010 Fax: (610) 319-7399  
 Email: [finaid.sward@villanova.edu](mailto:finaid.sward@villanova.edu) Website: [www.finaid.villanova.edu](http://www.finaid.villanova.edu)

Student's Name: \_\_\_\_\_ Villanova University Student ID Number: \_\_\_\_\_

Villanova University provides special consideration for dependent applicants whose families are experiencing a reduction in income due to one of the extenuating circumstances listed below. You **MUST** complete this form in its entirety, including a detailed explanation indicating all the reasons your family's 2019 income will be reduced, as well as submit supporting documentation. Consideration of your special circumstance is based on all information being complete with supporting documentation submitted with this form. Request will **NOT** be reviewed if form is incomplete or documentation is missing.

**PLEASE CHECK APPLICABLE SITUATION(S) AND ATTACH THE SUPPORTING DOCUMENTATION:**

A	<input type="checkbox"/> <b>Death of Parent:</b>	Date of Death: _____ <i>Month/Day/Year</i>	Relationship to Student: _____ <i>Father/Mother/Stepparent</i>
	<b>Supporting Documentation:</b> • Copy of Death Certificate		
B	<input type="checkbox"/> <b>Divorce or Separation:</b>	Date of Divorce or Separation: _____ <i>Month/Year</i>	Non-Custodial Parent Contribution towards educational expenses for the student who will be enrolled at Villanova University: _____ <i>Dollar Amount</i>
	<b>Supporting Documentation:</b> • Copy of Divorce Decree, if divorced • Copy of Legal Separation Agreement or Proof of Separate Residence (copy of mortgage or lease), if separated		
C	<input type="checkbox"/> <b>Change in Parent's Employment Status*:</b>	Date of Change: _____ <i>Month/Day/Year</i>	Relationship to Student: _____ <i>Father/Mother/Stepparent</i>
	<b>Supporting Documentation:</b> • Notice of Lay Off/Termination from Employer • Copy of Last Pay Stub from prior employer • Notice of Eligibility for Unemployment Benefits • Copy of Full Severance Agreement, if applicable • 3 Recent Pay Stubs from current employment, if employed	Date Unemployment Benefits Began: _____ <i>Month/Day/Year</i>	Was Severance Pay Received? _____ <i>Yes or No</i>
	*Change MUST have occurred AT LEAST two months prior to submitting request. *Reductions in overtime earnings or bonus income will NOT be considered as change to employment status.	If yes, what is the total amount of severance that was/will be received in 2019? _____ <i>Total Amount</i>	Date of Retirement, if applicable: _____ <i>Month/Day/Year</i>
D	<input type="checkbox"/> <b>Permanent and Total Disability:</b>	Date of Disability: _____ <i>Month/Day/Year</i>	Relationship to Student: _____ <i>Father/Mother/Stepparent</i>
	<b>Supporting Documentation:</b> • Confirmation of Disability from Health Care Provider • Statement of Benefits from Workmen's Compensation • Statement from Social Security Disability	Date Disability Benefits Began: _____ <i>Month/Day/Year</i>	
E	<input type="checkbox"/> <b>Untaxed Income has Ceased or been Reduced:</b>	Date of Change: _____ <i>Month/Day/Year</i>	Relationship to Student: _____ <i>Father/Mother/Stepparent</i>
	<b>Supporting Documentation:</b> • Proof of Cessation or Reduction	Type of Untaxed Income: _____	Reason for Change: _____

Student's Name: \_\_\_\_\_ Villanova University Student ID Number: \_\_\_\_\_

Complete both sections (Gross Taxed and Untaxed Income) below with income/resources (prior to exemptions, adjustments, or deductions) your family has received and expects to receive from January 1, 2019 until December 31, 2019.

**DO NOT LEAVE BLANKS – IF NONE, ENTER ZEROS.**

**TOTAL 2019 GROSS TAXED INCOME (January 1, 2019 – December 31, 2019)**

- |   |        |
|---|--------|
| 1. Wages, salaries, tips from father/mother/stepparent (please circle the parent)   | 1. \$  |
| 2. Wages, salaries, tips from father/mother/stepparent (please circle the parent)   | 2. \$  |
| 3. Severance Pay  | 3. \$  |
| 4. Pensions and annuities   | 4. \$  |
| 5. Interest and dividend income   | 5. \$  |
| 6. Business or farm income  | 6. \$  |
| 7. Capital gains  | 7. \$  |
| 8. Income received from rents after expenses paid for mortgage interest, taxes and insurance  | 8. \$  |
| 9. Alimony which will be received   | 9. \$  |
| 10. Unemployment Compensation   | 10. \$ |
| 11. Projected IRA, KEOGH and/or SDMPLE payment/distribution (include lump sum or early Withdraw from an IRA or other retirement fund) | 11. \$ |
| 12. Any other taxed income (including Stock Options, Vacation or Sick Pay)  | 12. \$ |

**Total 2019 – Gross Taxed Income** \$ \_\_\_\_\_

**TOTAL 2019 UNTAXED INCOME (January 1, 2019 – December 31, 2019)**

- |  |        |
|--|--------|
| 1. Payments from tax-deferred pension and savings plans (paid directly or withheld from earnings). Include untaxed portion of 401 (k), 403 (b), 457 (a), 501 (c)(16)(D), 414(a) plans. | 1. \$  |
| 2. Social Security benefits or SSI for all family members  | 2. \$  |
| 3. Retirement or disability benefits   | 3. \$  |
| 4. Worker's Compensation   | 4. \$  |
| 5. Welfare benefits including AFDC, ADC (including food stamps/SNAP) or TANF   | 5. \$  |
| 6. Untaxed portion of pensions   | 6. \$  |
| 7. Living & housing allowances (excluding rent subsidies for low income housing) for clergy, military, and others (include cash payments or cash value of benefits)                    | 7. \$  |
| 8. Child support or maintenance payments which will be received for ALL children   | 8. \$  |
| 9. Cash support or money paid on student's behalf  | 9. \$  |
| 10. Veterans non-educational benefits except student's educational benefits  | 10. \$ |
| 11. Railroad Retirement benefits   | 11. \$ |
| 12. Any other untaxed income and benefits such as Black Lung Benefits, Refugee Assistance, etc.  | 12. \$ |
| 13. Foreign income exclusion   | 13. \$ |
| 14. Earned income credit   | 14. \$ |
| 15. Untaxed money received, or paid on your behalf, not reported elsewhere on this form  | 15. \$ |
| 16. Loans (home equity, line of credit, family member, business.) Do not include Federal Direct Loan, PLUS Loan or Alternative Loans.  | 16. \$ |

**Total 2019 – Gross Untaxed Income** \$ \_\_\_\_\_

Reminder: If any section is left blank and/or supporting documentation is not attached, the Request for Revision will be considered incomplete and will not be reviewed.



# FINAL REMINDERS

- Document – document – document
- Case-by-case basis
- Stay within the statutes



# References

- Student Aid Index - Tools & Resources  
[https://www.nasfaa.org/tools\\_resources](https://www.nasfaa.org/tools_resources)
- Student Aid Index – Professional Judgement  
[https://www.nasfaa.org/StudentAidIndex?Professional\\_Judgement/Statutory\\_Authority](https://www.nasfaa.org/StudentAidIndex?Professional_Judgement/Statutory_Authority)
- GEN-09-05: Update on Professional Judgment by Financial Aid Administrators
- FSA Handbook December 2017, Special Cases Chapter 5 AVG pgs. 111-114
- NASFAA ASKREGS KA-34383







**THANK YOU !**

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