Special Circumstances:
Help when families experience changes and hardships

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SPECIAL CIRCUMSTANCE CONSIDERATION using Professional Judgment – What Is It?

- Decision process to alter standard assessment when unique or exceptional circumstances impact a family’s ability to pay for college
- Authority granted in the Higher Education Act for aid administrators to exercise discretion in specific areas of student aid administration

Professional Judgment – Why?

- Gives aid administrators the authority to consider individual circumstances
- Enables responsiveness to student circumstances that can’t be fully anticipated in legislation or regulation
- Supports access by targeting delivery of aid to qualified students in need
Professional Judgment – When?

- Students must file their FAFSA with the **actual** data/information requested.
- Colleges and universities may consider household, income and asset changes as well as significant financial hardships that occur after the timeline to which the FAFSA data corresponds.

Possible circumstances considered in professional judgment review:

<table>
<thead>
<tr>
<th>Circumstances</th>
<th>Reconsidered</th>
<th>Effective Date</th>
<th>Documentation Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Separation, divorce after FAFSA filed</td>
<td>Student/Parent</td>
<td>8/31/2021</td>
<td>Divorce decree, court documentation, change of address to separate households.</td>
</tr>
<tr>
<td>Marriage after FAFSA filed</td>
<td>Student/Parent</td>
<td>8/31/2021</td>
<td>Copy of marriage certificate.</td>
</tr>
<tr>
<td>Death</td>
<td>Spouse Parent</td>
<td>8/31/2021</td>
<td>Copy of death certificate.</td>
</tr>
<tr>
<td>Loss of Employment, Reduction in Income</td>
<td>Student/Parent</td>
<td>8/31/2021</td>
<td>Letter from employer documenting lost income of employment due to layoff, furlough, and documentation of significant earnings, unemployment, and disability benefits.</td>
</tr>
</tbody>
</table>

Special circumstance review might be warranted:

- Parent has job change with reduced wages
- Parents become divorced or physically separated
- Out-of-pocket medical expenses occur
possible circumstances considered in professional judgement review

<table>
<thead>
<tr>
<th>Circumstance</th>
<th>Documentation Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Loss of Benefits due to Child Support</td>
<td>Documentation of the termination of benefits, and documentation of post-dated benefits received</td>
</tr>
<tr>
<td>One Time Benefit or Payment</td>
<td>Documentation of the one-time benefit, and any records of how benefits were used</td>
</tr>
<tr>
<td>Estimating Unusual Medical, Dental or Other Essential Expenses</td>
<td>IRS Schedule A and W-2 or W-2c for expenses paid out of pocket and not covered by insurance. Patient must be member of household</td>
</tr>
<tr>
<td>Paid Hospital or Secondary School tuition</td>
<td>Receipt documentation of tuition and/or medical and/or dental expenses paid in 2022 (or additional to household) (Exemption only)</td>
</tr>
<tr>
<td>Other circumstance not listed on form</td>
<td>Documentation of the &quot;other&quot; circumstance that demonstrates a significant impact to household income</td>
</tr>
</tbody>
</table>

Professional Judgment – How?

- Identify special circumstances
  - Student or family reports change
  - College/Univ publicizes the availability of special circumstance review
- Determine validity and scope of circumstances
- Collect adequate documentation
- Maintain consistent practice when considering and adjusting
- Provide notification of PJ review outcome

When a PJ does not happen:

- When it will not result in any change to financial aid eligibility
- When documentation is not supplied or insufficient
- When the circumstance is not reasonable
  - Refusal to pay for college
  - Experience documented was common (standard in most households)
  - Experience documented was not essential, not discretionary
Other Types of Special Circumstance Consideration

- Cost of Attendance
  - Unusually high book and supply costs
  - Child care costs
- Dependency Status from Dependent to Independent
- Appeal of Academic Progress Deficiencies

Step Three (Student): Answer the questions in this step to determine if you will need to provide parent information. Once you answer "Yes" to any of the questions in this step, stop Step Four and go to Step Five on page 3.

A. Are you an enrolled student who is a dependent or independent student? (FAFSA will indicate your dependency status.) Yes □ No □

B. Do you have a FAFSA dependency question that you believe does not apply? YES (circle one):
   □ Yes □ No

C. Do you need to appeal your FAFSA dependency questions?
   Yes □ No □

1. Do you have any dependents other than your children or a spouse who lives with you and who receive more than half of their support from you?
   Yes □ No □

2. Do you have any dependents other than your children or a spouse who lives with you and who receive more than half of their support from you?
   Yes □ No □

3. Do you have any dependents other than your children or a spouse who lives with you and who receive more than half of their support from you?
   Yes □ No □

4. Do you have any dependents other than your children or a spouse who lives with you and who receive more than half of their support from you?
   Yes □ No □

5. Do you have any dependents other than your children or a spouse who lives with you and who receive more than half of their support from you?
   Yes □ No □

6. Do you have any dependents other than your children or a spouse who lives with you and who receive more than half of their support from you?
   Yes □ No □

7. Do you have any dependents other than your children or a spouse who lives with you and who receive more than half of their support from you?
   Yes □ No □

8. Do you have any dependents other than your children or a spouse who lives with you and who receive more than half of their support from you?
   Yes □ No □

9. Do you have any dependents other than your children or a spouse who lives with you and who receive more than half of their support from you?
   Yes □ No □

10. Do you have any dependents other than your children or a spouse who lives with you and who receive more than half of their support from you?
    Yes □ No □

11. Do you have any dependents other than your children or a spouse who lives with you and who receive more than half of their support from you?
    Yes □ No □

12. Do you have any dependents other than your children or a spouse who lives with you and who receive more than half of their support from you?
    Yes □ No □

When a student cannot answer YES to any of the FAFSA dependency questions but has a unique living situation

- I don't live with a biological or adoptive parent by no choice of my own
- Was kicked out of the family home
- Was removed by legal, court or other authority
- Left the home because of an unsafe environment (abuse, neglect)
- Dissolution of family unit (imprisonment, abandonment)
- Parent whereabouts are unknown, no contact
Summary of Dear Colleague Letter  Gen-11-15

The Financial Aid Administrator must prepare a written statement of why a dependency override is warranted. This statement must describe the unusual circumstances that led to the decision to perform an override and can be supported by documentation.

Four conditions that do not qualify as unusual circumstances:

- Parents refusing to contribute to student's education;
- Parents unwilling to provide information on the application for verification;
- Parents not claiming student as dependent for income tax purposes;
- Student demonstrating total self-sufficiency.

We are here to help students:

- Application questions
- Explaining the award package
- Borrowing and paying options
- Special circumstances

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