How to Appeal for More Financial Aid

What is Professional Judgment?
The process of appealing for more financial aid is usually called a professional judgment review or a special circumstances review.

- College financial aid administrators have the authority to make adjustments to the data elements on the Free Application for Federal Student Aid (FAFSA) or to the cost of attendance (COA) on a case-by-case basis when supported by documentation of special circumstances.
- Financial aid administrators may also override a student’s dependency status from dependent to independent when the student is affected by unusual circumstances. If the student’s dependency status is changed to independent, no parent information will be required on the FAFSA.

The decision of the college’s financial aid office is final. The college or university president, the U.S. Department of Education and state agencies cannot override the decision of the financial aid administrators, nor can they authorize changes to the FAFSA data.

What are Special Circumstances?
Special circumstances can include any financial circumstances that have changed from last year to this year and anything that distinguishes the family from the typical family. Examples include:

- Parent loses a job or experiences a salary reduction.
- The parent’s income is volatile, varying a lot from year to year.
- Recent death, disability, incarceration or institutionalization of the student’s parent.
- A family member is critically ill.
- The end of child support or Social Security benefits when the child reaches the age of majority.
- The family suffers a financial or natural disaster.
- The student’s siblings are enrolled in a private K-12 school.
- There are high dependent-care costs related to a special needs child or elderly grandparent.
- There are high unreimbursed medical and/or dental expenses not covered by insurance.
- Last year’s income was affected by one-time events that are not reflective of the family’s ability to pay.
- The family is concerned it cannot meet its required contribution.

What are Unusual Circumstances?
Unusual circumstances include unusual family situations or an abusive family environment that threatens the student’s health or safety. Examples include:

- There are court Protection from Abuse (PFA) orders against the student’s parents.
- Both of the student’s parents are incarcerated or institutionalized.
- The student is completely estranged from his or her family.

Statutory Authority to Make Adjustments

20 USC 1087tt(a)

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. Special circumstances may include ... or other changes in a family’s income, a family’s assets, or a student’s status. Special circumstances shall be conditions that differentiate an individual student from a class of students rather than conditions that exist across a class of students. Adequate documentation for such adjustments shall substantiate such special circumstances of individual students. …

20 USC 1087vv(d)(1)

The term “independent”, when used with respect to a student, means any individual who –

(I) is a student for whom a financial aid administrator makes a documented determination of independence by reason of other unusual circumstances.

- The student’s parents are divorced, the custodial parent dies, and the student has had no contact with or support from the noncustodial parent for an extended period of time.
- The student has been abandoned by his or her parents or is unable to locate his or her parents.

None of the following circumstances (even if combination) are sufficient justification for a dependency override:

- The student’s parents refuse to complete the FAFSA or to complete verification.
- The student’s parents refuse to help pay for the student’s college education.
- The student’s parents do not claim the student as a dependent for income tax purposes.
- The student demonstrates total self-sufficiency (including living on his or her own).

Timing of Financial Aid Appeals

- The student and family should take action immediately, regardless of whether the special circumstances are due to an ongoing need or a crisis.
- Although students may request special consideration at any time during the year, submitting a request as early as possible with appropriate documentation will help the student to be considered for the best range of available financial aid funds.
- Appeals must be resubmitted annually, to confirm that the special circumstances are still in effect.

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How to Request an Adjustment

- **Contact the financial aid office of each college** under consideration and ask about any special forms or procedures. Decisions by one school are not binding on the other schools.

- **Write a short summary of the special circumstances.** All statements should be signed and dated by the student and by at least one of his or custodial parents, if possible.
  - For Financial Circumstances: Provide specific details about the financial impact of the special circumstances. For example, write, “I will earn $4,000 less this year” instead of “I will make less money this year.” The college financial aid office needs specific dollar amounts; it cannot make estimates for the student. Also, specify the exact time period of the change. A student should not write, “I think my dad’s disability will last for a while.” It is better to say, “My father will be on disability for 12 months from February 2014 until January 2015.”
  - For Non-Financial Circumstances: The student should describe the exact conditions that make it difficult or impossible for his or her parents to complete their sections of the FAFSA. If a high school counselor can also write a summary of the situation, it is helpful. Counselors should include their name, phone number, email address and contact hours in case the college financial aid office has questions.

- **Provide copies of documentation of the special circumstances.** Independent, third-party written documentation is the best type of documentation. Be sure to include the student’s name, date of birth and college id number, if known, on all correspondence. The financial aid office cannot make an adjustment without documentation of the special circumstances.
  - For Financial Circumstances: The family should include copies of letters, pay stubs, eligibility statements, etc., which demonstrate the financial situation.
  - For Non-Financial Circumstances: The student will need letters from family friends, social workers, guidance counselors, doctors, members of the clergy, court-appointed child advocates, teachers or others who are familiar with the student’s situation. In addition, provide court, police or other public records to help document the unusual circumstances.

- **Confirm with each college financial aid office** that the materials were received and that nothing more is needed.

How Successful Appeals are Implemented

Generally, college financial aid offices may make three types of changes:

- The financial aid office may change one or more of the data elements on the FAFSA that are used to calculate the Expected Family Contribution (EFC).
- The financial aid office may change the student’s official cost of attendance (COA).
- The financial aid office may perform a dependency override to change the student’s dependency status from dependent to independent.

The amount of the adjustment will generally be based on the financial impact of the special circumstances after a holistic review of the student’s situation.

The changes to the data elements on the FAFSA and the student’s dependency status will yield a new EFC. This EFC, in combination with the (revised) cost of attendance, will yield a new figure for the student’s demonstrated financial need. The changes in the student’s demonstrated financial need will lead to changes in the student’s financial aid package. The adjustments may cause changes in the amount, types and sources of financial aid.

Why Would a Financial Aid Office Refuse to Make an Adjustment?

There are several reasons why a college financial aid administrator might deny a student’s appeal for additional financial aid. Some of the more common reasons include:

- The request is *not within the authority* of the college financial aid office. Financial aid administrators cannot change the eligibility criteria for federal student aid. For example, they cannot award Federal Pell Grants to graduate students.
- The request does not involve special circumstances. For example, a student wants to be considered for a dependency override based solely on the parent’s refusal to provide information on the FAFSA, but there are no extenuating circumstances.
- The request cannot be documented. Unless a student or his or her family can prove that a special circumstance actually exists, the financial aid administrator cannot consider it.
- The request represents a discretionary change or lifestyle choice. For example, most colleges will not make adjustments for the added cost of a luxury apartment, tithing expenses, vacation home or timeshare costs, or outstanding credit card balances. Similarly, most college financial aid administrators will not make adjustments when the student’s parents have decided to take early retirement so they can travel.
- The request is frivolous compared to more serious situations. For example, the student asks for an adjustment to dependent care costs because she wants to organize an expensive birthday party for her child.

Even if the financial aid administrator is willing to consider an adjustment, sometimes the student will not be eligible for any additional or any better money, and, therefore, making an adjustment will not result in a change to the student’s current financial aid offer. For example, if the student has a zero EFC, adjustments to the data elements on the FAFSA will not reduce the student’s EFC below zero.

Increasing the Odds of a Favorable Adjustment

- College financial aid administrators are more likely to make an adjustment when the special circumstances are due to factors beyond the family’s control, as opposed to discretionary choices.
- Financial aid is focused on the family’s ability to pay, not its willingness to pay.
- Be honest and polite. If the financial aid administrator believes that the family is trying to game the system, the financial aid administrator can deny the appeal.
- Requests submitted in writing by mail are less likely to be lost.