

Business Unit:	Student Financial Services	Policy Contact:	Charles Hill
Topic:	Financial Aid Special and Unusual Circumstance Policy	Contact Email:	charles.hill@strayer.edu
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Purpose

Strayer University (the “University”), in compliance with Section 479A of the Higher Education Act (“HEA”) and the amendments authorized by the FAFSA Simplification Act (the “Act”), is required to establish policies and a process for reviewing requests for professional judgment. Students may request professional judgment, due to special circumstances or unusual circumstances, to have their Expected Family Contribution (“EFC”) or Cost of Attendance (“COA”) adjusted, or the dependency status changed to independent through a dependency override. The University must also publicly disclose that students may request these adjustments due to special or unusual circumstances along with what is considered a special or unusual circumstance through its website, mailings, email and/or award notifications. This policy is subject to change to comply with administrative and regulatory requirements. Questions regarding this policy should be addressed to the Senior Director, Financial Aid.

Professional Judgment Authority & the Individuals Who May Exercise It

The Reauthorization of the HEA in 1992 provides the authority for financial aid administrators to exercise discretion for special or unusual family or student circumstances. This authority is known as “professional judgment.” It allows the aid administrator to treat a student individually when conditions exist that differentiate that student from a class of students. Special Circumstance and Unusual Circumstance requests must be evaluated on a case-by-case basis because of examining a particular student’s unique circumstances.

Definitions:

Professional Judgment – the Act distinguishes between two different categories of professional judgment by amending section 479A of the HEA: Special Circumstances and Unusual Circumstances.

Special Circumstances – refer to financial situations (loss of a job, etc.) that justify the Financial Aid Team adjusting data elements in the COA or in the EFC calculation.

Unusual Circumstances – refer to the conditions that justify the Financial Aid Team making an adjustment to a student’s dependency status based on a unique situation (e.g., human trafficking, refugee or asylee status, parental abuse or abandonment, incarceration), commonly referred to as a dependency override.

Policies:

A student may have both a special circumstance and an unusual circumstance. The Financial Aid Team may make adjustments that are appropriate to each student’s situation with appropriate documentation of the adjustment determination.

The Financial Aid Team may treat a student with special circumstances differently than the strict application of the methodology would otherwise permit. Adjustments can either increase or decrease a student’s EFC or COA. In the case of an adjustment to a student’s EFC or COA, specified adjustments may be made to data elements. The reason for the adjustment must relate to that student’s special circumstances and must be appropriately documented.

Special Circumstances:

The University may use professional judgment on a case-by-case basis to adjust a student’s cost of attendance or the data used to calculate their EFC.

Some examples of special circumstances that **MAY** be considered (HEA Sec. 479A):

- Loss of income (EFC adjustment only);

- Change in employment status, income, or assets;
- Change in housing status (e.g., homelessness);
- Tuition expenses at an elementary or secondary school;
- Medical, dental, or nursing home expenses not covered by insurance;
- Child or dependent care expenses;
- Severe disability of the student or other member of the student's household; or
- Other changes or adjustments that impact on the student's costs or ability to pay for college.

This is not an exhaustive list, and all requests will be given consideration. The University may use its discretion to make appropriate, reasonable adjustments to reflect a student's situation more accurately. This may include accounting for resources, such as in-kind support, which does not appear on the FAFSA or in the EFC calculation. The University may also use its discretion to deny a student's request for adjustment. The reason for approval or denial of a request for professional judgment and any subsequent adjustments **must be documented**. The documentation must relate to the special circumstances that differentiate the student—not the conditions that exist for a whole class of students. The University must resolve any inconsistent or conflicting information and if selected, complete verification before making any adjustments. The University's decision regarding adjustments is final and cannot be appealed to the Department of Education.

Special Circumstance Requests must be submitted no later than one month before the end of the financial aid year to ensure that any approved increase is made before the end of the financial aid award year. Every effort will be made to approve or deny a Special Circumstance Request within one week of receipt. However, this may take longer during peak processing times.

EFC Changes:

- EFC changes will be primarily for undergraduate students.
- EFC changes typically impact Pell and subsidized Direct Loan eligibility.
- Documentation will include the Special Circumstance Request form, student's written statement explaining the circumstance, and supporting documentation of income reduction from the change in circumstance (example: tax returns, W-2s, separation from employer letters, etc.).

COA Changes:

- COA changes will be considered for both undergraduate and graduate students.
- This change can include multiple reasons: childcare expenses, unusually high medical expenses, documented need of a computer, etc.
- Documentation of expenses for services the student received must be during the financial aid year in which the adjustment is being made (example: the date of service must be during the financial aid year, even if the billing date is not during the same financial aid year).

Procedures for Special Circumstances Requests:

- 1) Student requests a Special Circumstance Request form.
- 2) Student Services Coach or Financial Aid Advisor sends the Special Circumstance Request Form to the student.
- 3) Student submits a completed Special Circumstance Request Form to the Financial Aid Team via their student portal:
 - a) Student submits supporting documentation of the request along with the Special Circumstance Request form.
 - b) The Special Circumstance Request form will not be reviewed by the Financial Aid Team until the form is complete and supporting documentation has been received.
- 4) The Special Circumstance Request form is reviewed by a Student Financial Services (SFS) Verification Specialist:
 - a) The form and its supporting documentation must be uploaded to the student's account which will queue it for review.

- b) A SFS Verification Specialist reviews the request and may mark the documents incomplete and request updates or additional documentation. The SFS Verification Specialist either approves or denies the request based on the information provided in the form and the supporting documentation.
 - i. A student should show a total of a 30% reduction in household income to qualify for an EFC adjustment.
 - ii. ISIR should be checked and if the EFC is already zero, the student does not qualify for an EFC adjustment.
 - iii. Students have three document submission attempts in the review process; however, exceptions may be made at the reviewer's discretion.
 - iv. Reviews marked "incomplete" must have detailed notes placed on the accounts identifying what the student needs to submit. These detailed notes should be placed in the activity tab of the account.
 - v. An email must be sent to the student and the student's Student Services Coach with the specific details of why the request is incomplete.
 - vi. Add a copy of the email sent to the student to the activity tab.
 - vii. All supporting documentation should be retained for at least 3 years after the student's last term of enrollment.
- 5) Student's account should be noted if the request was approved or denied, with the reason for denial or approval included in the notes section of the document requirement.
 - a) An email must be sent to the student and student's Student Services Coach informing them of the final decision, whether approved or denied.
 - b) All Special Circumstance Request decisions are final and cannot be appealed.
- 6) If the Special Circumstance Request is approved, the SFS Verification Specialist makes the adjustment to the budget for COA or the ISIR for EFC:
 - a) SFS Specialist makes awarding adjustments for COA approvals; OR
 - b) SFS Verification Specialist notifies Financial Aid Team once updated ISIR is received to have a SFS Specialist adjust awarding for EFC approvals.

Unusual Circumstances:

The University may use professional judgement to assist students with unusual circumstances to adjust dependency status on the FAFSA form to more accurately reflect students' situations (i.e., dependency overrides). The Financial Aid Team may conduct dependency overrides on a **case-by-case** basis for students with unusual circumstances. If the Financial Aid Team determines an override is appropriate, documentation of determination, with any supporting documentation, must be maintained.

Under HEA Sec. 480(d)(9), the Act incorporated additional unusual circumstances to consider when a student is unable to contact a parent or where contact with parents poses a risk to such student.

Unusual circumstances include:

- Human trafficking, as described in the Trafficking Victims Protection Act of 2000 (22 U.S.C. 7101 et seq.);
- Legally granted refugee or asylum status;
- Parental abandonment or estrangement;
- Student or parental incarceration;
- A homeless unaccompanied youth; or
- Self-supporting and at risk of homelessness.

However, none of the conditions listed below, alone or in combination, qualify as unusual circumstances meriting a dependency override.

Unusual circumstances do NOT include:

- Parents refuse to contribute to the student's education;
- Parents will not provide information for the FAFSA or verification;
- Parents do not claim the student as a dependent for income tax purposes; and
- A student demonstrates total self-sufficiency.

A Financial Aid Team may override only from dependent to independent (though as indicated earlier, if an independent student receives substantial support from others, a school may use professional judgment to adjust the COA or FAFSA data items, such as untaxed income).

Requests must be submitted no later than one month before the end of the financial aid year to ensure any approved dependency status change is made before the end of the financial aid award year. Every effort will be made to reach a determination on an Unusual Circumstance Request within one week of receipt. However, this may take longer during peak processing times.

Procedures for Unusual Circumstances Requests:

- 1) Student requests an Unusual Circumstance Request form.
- 2) The Unusual Circumstance Request form is sent to the student.
- 3) Student submits the completed Unusual Circumstance Request form and supporting documentation to the Financial Aid Office via their student portal. The Unusual Circumstance Request form will not be reviewed by the Financial Aid Team until the form is complete and supporting documentation has been received.
- 4) The Unusual Circumstance Request form is reviewed by a Student Financial Services (SFS) Verification Specialist.
 - a) The form and its supporting documentation must be uploaded to the student's account which will queue it for review.
 - b) A SFS Verification Specialist reviews the request and may mark the documents "incomplete" and request updates or additional documentation. At any time in the review process, the SFS Verification Specialist may approve or deny the request based on the sufficiency of the information provided in the form and whether the supporting documentation is appropriate.
 - c) Students have three document submission attempts in the review process; however, exceptions may be made at the reviewer's discretion.
 - d) Reviews marked "incomplete" must have detailed notes placed on the accounts identifying what the student needs to submit. These notes should be placed in the activity tab of the account.
 - e) An email must be sent to the student and the student's Student Services Coach with the specific details of why the request is incomplete.
 - f) Add a copy of the email sent to the student to the activity tab.
 - g) All supporting documentation should be retained for at least 3 years after the student's last term of enrollment.
- 5) Student's account should be noted if approved or denied, with the reason for denial or approval included in the notes section of the document requirement.
 - a) An email must be sent to the student and student's Student Services Coach informing them of the final decision, whether approved or denied.
 - b) All Unusual Circumstance Request decisions are final and cannot be appealed.
- 6) If the Unusual Circumstance Request is approved, the SFS Verification Specialist makes the adjustment to the ISIR for the dependency status change:
 - a) SFS Verification Specialist notifies the Financial Aid Team once an updated ISIR is received to have a SFS Specialist adjust awarding.
 - b) If the student has obtained an adjustment for unusual circumstances and a final determination of independence has been made, then the student is deemed to be independent for each subsequent award year at the same institution unless the student informs the institution their circumstances have subsequently changed or the institution has conflicting information about the student's independence.