

# WESTERN NEBRASKA COMMUNITY COLLEGE

## President's Procedure

<b>TITLE:</b>	Financial Aid – Professional Judgment
<b>DIVISION:</b>	Student Services
<b>CATEGORY:</b>	Financial Aid
<b>REFERENCE:</b>	BP-502 Federal Title IV Funds Policy Higher Education Act (HEA), Sec. 479A(a); Section 480(d)(7) U.S. Department of Education, Federal Student Aid, Professional Judgment Participant's Guide
<b>NUMBER:</b>	PP-503
<b>DATE OF REVIEW:</b>	
<b>APPROVAL:</b>	President's Cabinet

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### **Purpose**

This procedure defines when a WNCC Financial Aid Administrator may exercise discretion or exhibit “professional judgment,” as per the Higher Education Act, to allow for treatment of an individual with special circumstances

### **Scope**

This procedure applies to any WNCC student receiving Title IV funding who may require case-by-case individualized attention after examining said student's special circumstances.

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### **Definitions**

*Independent Student:* An individual who meets any of the following circumstances: is 24 years of age or older by December 31 of the award year; was an orphan, in foster care, or ward of the court at any time since turning age thirteen (13); is an emancipated minor or in legal guardianship when reached age of majority, as determined by a court; is a veteran of the Armed Forces of the United States (as defined in subsection (c)(1)) or is currently serving on active duty in the Armed Forces for other than training purposes; is a graduate or professional student; is a married individual; has legal dependents other than a spouse ; was determined to be an unaccompanied youth who was homeless or at risk of being homeless (as defined by applicable federal law); or is a student for whom a financial aid administrator makes a documented determination of independence by reason of other unusual circumstances.

*Satisfactory Academic Progress:* The student is meeting both the qualitative requirement (grade point average) and quantitative requirement (Pace) to maintain eligibility, as defined in the WNCC Standards of Student Academic Progress Board Policy.

*Special Circumstances:* 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 of such adjustments shall substantiate such special circumstances of individual students.

*Student Eligibility:* A student meets eligibility requirements generally if he/she is presently enrolled at an institution and is maintaining satisfactory progress in the course of study the student is pursuing in accordance with the provisions of Satisfactory Academic Progress.

### **Procedure**

Students may require individualized assistance due to their special circumstances and issues, as determined on a case-by-case basis. WNCC has identified when professional judgement may need to be exercised, such as, but not including:

*Special circumstances related to financial need:*

- Loss or reduction of income earned from work experienced by the student, spouse or parent, if dependent.
- Loss of benefits or other income such as child support, social security benefits, unemployment or one-time income.
- High medical/dental/ or other unusual costs.
- Loss of income or benefits due to death or divorce.

*Dependency override circumstances:*

- Abandonment by parents.
- Abusive family environment that threatens the student's health or safety.
- Student is unable to locate parents.

*Basis for Professional Judgment:*

The Financial Aid Administrator, responsible for the awarding of aid, is authorized to exercise professional judgment. Professional judgment will be exercised after the student financial aid file has been verified, if selected, and after any conflicting or inconsistent information has been resolved. Professional judgment will not be used to change the need analysis formula, change a student status from independent to dependent, or to add post-enrollment costs to a student's budget. The decision of the professional staff member is final and cannot be appealed to the U.S. Department of Education.

### *Professional Judgment Process*

All requests for consideration of professional judgment must be initiated by the student in writing. Requests should be received by the financial aid office with all supporting documentation, preferably before the middle of the term for which it is requested. The professional judgment forms must be signed by the student and spouse, if married, or parent if dependent.

Students who are requesting a professional judgment for change in income must complete the WNCC Income Change Appeal form made available on the Financial Aid Forms page of the WNCC website or through links available in the student's portal, and attach all supporting documentation. The form and documentation will be forwarded to a professional staff member for review and processing. If additional documentation or explanation is required, the student will be notified either by telephone or in writing.

The professional staff member is responsible for reviewing the income change appeal form, all supporting documentation for consistency, and to prepare all calculations necessary to determine any data adjustments that will be made, as supported by the documentation. The student must provide both actual year-to-date income and benefits and anticipated income and benefits for the calendar year requested on the income change appeal form. The data provided by the student must be supported by the attached documentation. The professional staff member may use either the data from the worksheet or the supporting documentation to alter the data elements used to calculate the Expected Family Contribution (EFC) or to adjust the student's cost of attendance. All projected income and benefits fields will be adjusted to the new calendar year data, not just the elements which experienced a decrease.

Professional staff members may change the data elements in one of three ways. They may enter the new data in the Student Information System (Ellucian Colleague) and set the professional judgment flag on, or they may adjust the data elements on the Department of Education web site for financial aid professionals. All approved requests will be sent to the federal processor for reprocessing. The student's financial aid package will be adjusted after the new Institutional Student Information Record (ISIR) is received from the processor. Approved requests, which affect the student's cost of attendance, only, such as unusually high tuition and fees or childcare costs, will be documented in the student's file.

Students who are requesting a professional judgment for dependency override must complete the WNCC Dependency Override form made available on the Financial Aid Forms page on the WNCC website or through links available in the student's portal, and attach all supporting documentation. The form and documentation will be forwarded to a professional staff member for review and processing. If additional documentation or explanation is required, the student will be notified either by telephone or in writing.

The professional staff member is responsible for reviewing the dependency override form and all supporting documentation to determine whether the student qualifies for the override. The student must provide tax returns for the prior two tax years, copies of documents detailing living arrangements, and statements from the student and unrelated third party outlining student's family situation.

The professional staff member may set the dependency override flag through the Student Information System (Ellucian Colleague). The approved request will be sent to the federal processor for reprocessing. The student's financial aid will be packaged according to their eligibility after the new ISIR is received from the processor.

## **Request for Professional Judgment Consideration**

### *Procedures*

Students and parents may be informed of the right to request a professional judgment through published handbooks or catalogs, on WNCC's financial aid web site or by a financial aid staff person. The student is required to complete the applicable WNCC form and submit it along with all supporting documentation to the Office of Financial Aid. Office staff may review the request for required signatures and documentation. Incomplete applications may be returned to the student for required signatures or documentation.

Once a request is received, it is routed to a financial aid professional staff member for review. The financial aid staff member will review both the completed worksheet and the supporting documentation. The financial aid professional staff member will make a recommendation to approve the request or deny the request. The student's packet of documentation will be forwarded to the other financial aid professional staff, including the Financial Aid Director, for review of all documents and of the original reviewer's recommendation. Each reviewer initials the documentation page included with the packet to indicate consent. Any corrections or additional information deemed necessary by the reviewers must be processed before the packet is finalized and a decision determined. If approved by all professional staff, the original reviewer will adjust the data elements supported by the documentation. A copy of the adjustments will be included in the student's financial aid file as a part of the student's appeal requests. Students will be informed in writing of the decision. The written approval or denial may be in the form of a revised Institutional Student Information Record (ISIR) or an award letter. Requests that culminate only in an adjustment to the student's cost of attendance will be documented in the student's file.

### *Documentation*

The Income Change Appeal form must be supported by accurate documentation. Documentation to support a change in income from work might include a letter from the employer with dates of employment, a copy of the most recent pay stub, or a copy of the W-2, if the end of the calendar year has passed.

Documentation to support a change in income other than from work might include a letter from the Social Security Administration, court order for child support, or letter from the Department of Social Services to indicate loss or change in benefits. Documentation to support high medical or dental expenses would include copies of medical bills paid by the student or family.

Documentation included with a Dependency Override form must include a signed statement from the student explaining the unusual circumstances that prevented the student from obtaining parents' information, copies of the student's prior two years' federal income tax returns, a signed statement from an unrelated third party, as well as other documentation explaining how the student is being supported.

Requests without documentation will not be considered. Each of the professional judgment forms lists required and suggested documentation for each scenario, which may be appealed. Students and their parents may also get suggestions for supporting documentation from financial aid staff. If the documentation is insufficient or unclear, a staff person may attempt to clarify the information or request additional documentation. If the requested information or documentation is not provided, the request may be denied.

**Revising this Procedure**

This President’s Procedure supersedes any prior WNCC policy, procedure, guideline or handbook on this subject matter.

WNCC reserves the right to revise this procedure, as necessary, or as new laws require attention.