

Using Professional Judgment IN FINANCIAL AID TO ADVANCE RACIAL JUSTICE AND EQUITY

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Acknowledgments: *Throughout the creation of this brief, we had excellent contributions from experts and financial aid officers from the [National Association of Student Financial Aid Administrators \(NASFAA\)](#), who are dedicated advocates for public policies that increase student access and success. We would also like to thank the [Seldin/Haring-Smith Foundation](#) for funding this report and for their continued focus on racial justice and equity issues in higher education.*

[Public higher education has long been unaffordable](#) for many students, especially for Black and Latino students who have substantially [less wealth](#), on average, than their White peers.¹ Unfortunately, the economic devastation caused by COVID-19 has only exacerbated these financial inequities for Black and Latino households, who have been [hit hardest](#) by unemployment and income loss amid the pandemic.² The current economic downturn may not only impact how much Black and Latino families can pay for college, but how much aid they will be awarded for the upcoming year. That’s because, in the upcoming cycle, the Free Application for Federal Student Aid (FAFSA) will be based on their tax returns from 2019, i.e., two years prior, and institutions will use that information to calculate how much students can afford to pay out of pocket for college and how much to award them in aid.

This “prior-prior year” policy was put in place in 2016 to make it faster and easier to complete the FAFSA. Under the old policy, which was based on prior-year tax information, students had to wait until their parents filed their taxes before starting the FAFSA application process, which not only produced a lot of stress, but led many to miss the application deadlines for state grants that they would otherwise have been eligible for. But while this new policy lets students get an earlier start on the FAFSA, it also means that, in the case of students whose families have experienced job loss or a financial setback amid the pandemic, institutions could be using pre-COVID-19 income information that no longer reflects students’ financial reality.

One potential solution is for students to seek a [professional judgment](#) from the financial aid office, which can assign a financial aid officer to review their situation and decide whether adjustments to the FAFSA are warranted so students can qualify for more aid.³ Unfortunately, many students — particularly Black and Latino students who are [more likely to be first in their families](#) to attend college and may not have parents who know the ropes — are [unaware](#) that appealing for more aid is even an option.⁴ With these racial equity implications in mind, this brief analyzes the professional judgment process, its advantages and limitations, how financial aid officers can address racial justice, and provides recommendations on making professional judgment practices more equitable.

KEY FINANCIAL AID CONCEPTS

In order to know which federal grants, work-study, and loans students qualify for, students must submit their personal and financial information via FAFSA every year. A student is classified as [dependent](#) if they are financially reliant on their parents and must report their parents' information along with their own. A student is considered [independent](#) (and need only report their own information and, if married, a spouse's) if they are one or more of the following: at least 24 years old, married, a graduate student, a veteran, a member of the armed forces, an orphan, a ward of the court, someone with legal dependents other than a spouse, an emancipated minor, or someone who is homeless or at risk of becoming homeless.⁵

The FAFSA then uses this data to calculate a student's [expected family contribution](#), which is a number that colleges use to determine the amount a family can contribute. The expected family contribution calculation takes into account information from the FAFSA, such as student and family income and assets, and measures a family's financial strength on a sliding scale, starting at zero — which demonstrates exceptional financial need.⁶ The amount and type of aid for which students are eligible depends both on their expected family contribution and the [cost of attendance](#) at their respective institution, which factors in tuition and fees, cost of living, books, transportation, and child care.⁷

Financial aid offices use both the cost of attendance and expected family contribution to determine a student's financial aid package, which shows the total amount of aid being offered and the various forms it will take (e.g., grant, scholarship, loan, work-study). For example, a student with a low expected family contribution might be eligible for a combination of need-based aid — like the Pell Grant and Federal Supplemental Educational Opportunity Grant — institutional grants, work-study, and federal loans, while a student with a high expected family contribution might only be eligible for certain loans and scholarships.

UNDERSTANDING PROFESSIONAL JUDGMENT AND ITS CURRENT POLICIES

Financial aid offices use a standardized approach to determine how much aid to award to students. Unfortunately, sometimes a student experiences special circumstances like a family death, loss of income, or out-of-pocket medical expenses that are not fully captured by this formulaic approach. In these extreme cases, financial aid officers can use their professional judgment to reassess certain aspects of the student's situation and more accurately determine their needs and potentially provide additional grant aid or loans to help said student. [According to the U.S. Department of Education](#), professional judgment can only be used as follows:

- to override a student's [dependency status](#);
- to adjust the data used to calculate the expected family contribution;
- to revise elements of the cost of attendance;
- to deny or reduce direct loan eligibility;
- to provide direct loan eligibility for a dependent student without parental FAFSA information;
- to assess [satisfactory academic progress](#) (i.e., to make sure a student is meeting certain GPA and credit requirements for aid).⁸

It should be noted that financial aid officers cannot directly alter a student's final expected family contribution or cost of attendance total, but they can adjust the data used to calculate the total, which may yield a new figure. The law also [prohibits the U.S. Department of Education](#) from directly regulating how professional judgments are used, though it can provide subregulatory guidance on the matter.⁹ For example, a financial aid officer must have [adequate documentation](#) to substantiate their professional judgment decision, but it is up to the financial aid officer to decide which documents to collect.¹⁰ In addition, professional judgments are determined on a [case-by-case basis](#), so a judgment can only apply to an individual student and not to a group of students, even if their circumstances are similar, and [cannot be used to discriminate](#) on the basis of race, religion, sex, or national origin.¹¹

In the past, some [financial aid officers have been reluctant](#) to use professional judgment, since it's more likely to prompt a [review](#) by the U.S. Department of Education to make sure they are complying with federal regulations. If they were found to have improperly disbursed Title IV funds, they would be forced to pay a hefty fine.¹² While professional judgments were [initially considered](#) red flags that might prompt an audit, the U.S. Department of Education recently issued [updated guidance](#) assuring colleges that they would not be penalized for using professional judgments in academic years 2019-20 and 2020-21 due to the pandemic.¹³

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THE POWER OF PROFESSIONAL JUDGMENT AND WHY FINANCIAL AID OFFICERS NEED MORE EQUITY TRAINING

Since there is no uniform professional judgment process, the U.S. Department of Education [recommends](#) that financial aid offices create internal policies detailing the circumstances and documentation required for professional judgment review.¹⁴ For instance, some colleges may require that the loss of income be greater than 25% of the original, while others may be willing to consider an adjustment based on any income or job loss. Still others might have a minimum unemployment threshold of two months or more for consideration. Ultimately, professional judgment is at the financial aid officer's discretion, granting them immense power in the process.

That could be cause for concern, as [all judgments](#) are subjective and potentially susceptible to implicit bias.¹⁵ Furthermore, very little is known about financial aid officers. The National Association of Student Financial Aid Administrators (NASFAA) — a membership organization that provides training for financial aid officers and has regional chapters across the country — [states that they have](#) over 28,000 professionals at nearly 3,000 colleges, but data disaggregated by race/ethnicity or gender is not publicly available.¹⁶ Unfortunately, the U.S. Department of Education does not provide publicly available demographic data on financial aid officers either.

The Education Trust also investigated what kind of training financial aid officers receive to understand and address racial justice issues. Both the U.S. Department of Education and NASFAA offer training to financial aid officers year-round, but what that entails varies greatly. According to the U.S. Department of Education website, neither of the national conferences hosted by the department in [2018](#) and [2019](#) provided training centered on racial justice, diversity, equity, inclusion, or implicit bias.¹⁷ NASFAA, on the other hand, has a comprehensive list of training sessions around diversity, equity, and inclusion from the past four years, with workshops on topics such as diversity in the hiring process, microaggressions, ethics, and mitigating bias.¹⁸ [NASFAA also has](#) a diversity officer, as well as a diversity leadership program to develop members from marginalized backgrounds and a diversity toolkit for state and regional efforts.¹⁹ However, the diversity officer is a volunteer appointed by NASFAA members on a two-year basis, and the leadership program accepts just six members annually out of the organization's 28,000 members.



Furthermore, neither NASFAA nor the U.S. Department of Education has set racial equity benchmarks for members to meet, so while they offer training at national conferences, it's not in any way mandatory. Institutions could and should require officers to undergo racial-equity training, but that information is not currently tracked. The closest figures we were able to find were from a 2020 NASFAA survey, which for the first time included questions around racial equity training in appeals. According to the survey, 68% of respondents reported that their financial aid office was providing training on implicit bias before the pandemic, but the survey did not indicate whether that training was required.²⁰

Moreover, the 2020 survey found that only 37% of financial aid offices are reviewing professional judgment policies for potential bias; meanwhile, 66% of respondents said their office was **not** considering diversifying the appeals committee.²¹ These findings have racial equity implications, since studies on the intersections of race and financial aid policies show that race is often a factor in how students of color [experience](#) the financial aid process, policies, and the [stereotypes](#) that can be placed upon them in the process. Financial aid policies, as well as the perceptions of staff, can reflect racist ideas or a [colorblind racist ideology](#) that can impede full access to financial aid and perpetuate White privilege.²²

PROFESSIONAL JUDGMENTS HAVE THE POTENTIAL TO HELP STUDENTS, BUT ALSO HAVE LIMITATIONS

Surveys show that [appeals have increased](#) — especially at high enrollment institutions — and 58% of financial aid officers expect additional increases later this year.²³ But while professional judgment can give a financial aid officer the power to reassess a student's financial need, its ability to help students who are most in need will be limited by federal aid guidelines and the financial resources an institution has available.

To highlight the limitations of professional judgment, let's consider an independent student who lost their job and recently had an out-of-pocket medical expense (*a more detailed example can be found in the Appendix*). This student could appeal for more aid, and a financial aid officer could adjust their income and plug the revised amount into the expected family contribution formula to see if it yields better results. However, if the student is already receiving the maximum amount of federal aid (i.e., they already have an expected family contribution of \$0), adjusting the expected family contribution formula might not yield better results. Since Black, Native American, and Latino students [are most likely to be from low-income households and have zero expected family contributions](#), they are least likely to get relief from such appeals.²⁴

Another option, however, would be for the financial aid officer to use professional judgment to adjust elements of a student's cost of attendance — such as the cost of books, rent, transportation, technology, dependent care, or medical expenses. Financial aid officers use a formula called an [income protection allowance](#) to assess basic living expenses based on household size.²⁵ If the medical expense incurred by the student is higher than the amount covered by the formula, the financial aid officer could then use their professional judgment to increase the student's medical costs under cost of attendance, which would yield a new total amount.

Unfortunately, the ability of financial aid officers to consider such appeals and offer relief depends on the resources of the institution. This was noted in a 2019 NASFAA survey, in which [two-thirds](#) of respondents said that their office does not make professional judgment adjustments due to staff resources (or a lack thereof).²⁶ [In addition](#), according to a 2020 survey, less than half of the respondents said their office was proactively reaching out to students to inform them of appeals.²⁷

Even if an institution had the staff to consider professional judgment cases, its ability to provide financial relief would depend on the amount of money the institution had on hand for need-based grants. This was noted in a recent NASFAA survey, in which 89% of the respondents said their office would not offer discounts on future tuition, room, board, or books to reduce the number of professional judgment requests.²⁸ Furthermore, only 32% of the respondents said their office was awarding emergency funding proactively to reduce the number of appeal requests, which suggests that institutions lack sufficient relief funds.²⁹ Unfortunately, Black and Latino students are disproportionately more likely to attend [underfunded public institutions](#), and such institutions often have less support to give — one study estimates that public colleges spend approximately [\\$5 billion](#) less annually educating students of color than their White peers.³⁰ That leaves Black and Latino students from low-income backgrounds with few options besides applying for outside scholarships, taking on more student loans or credit card debt, or working additional hours (and spending less time on academics) to make up the difference — trends that we are already seeing among [Black](#) and [Latino](#) students.³¹

SOME PROFESSIONAL JUDGMENTS ARE TRACKED, BUT THE INFORMATION IS NOT PUBLICLY AVAILABLE

As part of subregulatory guidance from the U.S. Department of Education, schools must [flag professional judgments](#) if they make changes to a student's expected family contribution data elements.³² This flag goes to the Central Processing System, which manages the application and eligibility determination portion of the federal student aid process. However, this data is not publicly available. What's more, the flag only applies to files with expected family contribution data adjustments, and is not applied to other professional judgment situations, such as cost of attendance data adjustments. And while institutions are required to document professional judgments in case of a program audit, they are not required to annually report them to the U.S. Department of Education, as institutions do for the integrated postsecondary education data system (IPEDS).



RECOMMENDATIONS FOR USING PROFESSIONAL JUDGMENT TO ADVANCE EQUITY

In home lending, [racist practices such as redlining](#) meant lenders made more government resources available to White Americans, while denying home loans to residents of communities that were deemed “undesirable,” especially those made up of Black and Latino people.³³ While redlining was outlawed in 1968, today’s racial wealth gap and school funding inequities can be directly [traced to it](#).³⁴ Thus, it seems only fair to ensure that higher education resources end up in the hands of Black and Latino students from low-income backgrounds who are struggling the most to pay for college. In 2019, the federal government spent [\\$130 billion in financial aid](#) to support over 11 million students and their families, but had very little information on how much of this was awarded through financial aid appeals.³⁵ How financial aid officers use professional judgment and their discretion could well determine whether underrepresented students of color and those from families with limited financial resources can access a higher education and go on to finish their degree, or become one of the estimated [36 million](#) or more who drop out and miss out on the social mobility that a degree can offer.³⁶ Institutions and policymakers should, therefore, do more to make these decisions transparent, and ensure that financial aid officers have the tools and the discretion to use professional judgment to advance equity rather than limit opportunity.

What Institutions and Practitioners Can Do

Financial aid officers are in a difficult position, and the stakes are high for a growing number of students and families struggling with COVID-19 induced financial hardships. According to a [recent NASFAA survey of financial aid administrators at member institutions](#), requests for professional judgments are surging, with over half of the respondents anticipating an increase.³⁷ Unfortunately, institutions are not required to publicly release information on professional judgment requests, including the number of requests, which students are making requests, and the decisions of financial aid officers. This lack of transparency leaves financial aid officers, not to mention members of the public, in the dark about the impact and efficacy of these decisions and what supports might be needed to help advance equity when so many vulnerable students are struggling. That is why we recommend that institutions do the following:

- **Collect data on professional judgment requests and decisions and disaggregate this data by race.** Institutions should make this information available to practitioners and the public, regardless of whether the federal government requires them to do so.
- **Track and report the racial demographics of financial aid officers and make this data publicly available,** since these administrators, like other key staff and faculty, have a direct impact on student opportunity and success.
- **Provide and mandate continuous education and training on racial justice and equity issues,** so practitioners can be better attuned to the needs and experiences of students of color and students from low-income backgrounds and have the necessary training and tools to assist them.
- **Create student advisory groups that are representative of the student population,** so administrators can collaborate with students, better understand their needs, and find more effective ways to communicate with them.
- **Consider an adjustment based on any income or job loss rather than requiring a specific threshold for the loss of income (i.e., loss of income must be greater than 25%).**

- Explore [transferring all or some](#) of their Federal Work-Study allocation into emergency Federal Supplemental Educational Opportunity Grants, especially if the school is experiencing a decrease in on-campus employment due to majority online enrollment.³⁸

Since professional judgment is not directly regulated by the U.S. Department of Education, there are no standard procedures when it comes to the process. In order to ensure that financial aid officers are employing best practices when considering such appeals, [NASFAA suggests](#) they do the following:

- **Use the income that best reflects the student's current financial** situation and avoid overburdening applicants with requests for more information than is necessary to make a professional judgment decision on their appeal.
- **Train financial aid administrators on how to use their professional judgment, using test environments within the financial aid processing system** to highlight effective approaches and changes that can elicit awards that are better aligned with a student's financial need.³⁹

What Policymakers/Federal Government Can Do

The U.S. Department of Education [recently reinstated some of its 2009 guidance](#) encouraging financial aid officers to use professional judgment to provide resources to students during an economic crisis without fear of being audited, but this should be seen as a first step toward making professional judgments more equitable, rather than a solution.⁴⁰ The director of NASFAA has publicly stated that the U.S. Department of Education should also re-issue guidance allowing institutions to expedite the process of zeroing out a student's income, which can impact their expected family contribution.⁴¹ Several members of Congress have also [outlined other potential next steps](#) and urged the U.S. Department of Education to post information about the professional judgment process and best practices, and provide additional outreach for students on its COVID-19 frequently asked questions page, but additional federal oversight is needed.⁴² We would urge the U.S. Department of Education to do the following:

- **Require institutions to collect and analyze data on professional judgment requests and decisions, disaggregate it by race, and make this information available to the public.**
- **Collect and publish data on the racial demographics of financial aid officers.**
- **Provide information, guidance, resources, and tools on implicit bias and racial justice, and require financial aid officers to meet continuous equity training benchmarks.** NASFAA provides some resources and tools to financial aid officers, but ED should provide them as well.

The recommendations made here would help ensure that professional judgment is used in a way that advances equity and provides students with the resources they need to pay for college. In addition, there are some policies that could not only give students more seamless access to aid, but ensure that there is aid available for financial aid officers to distribute to those who need it most. These include **reducing the number of questions on the FAFSA**, so that students do not miss out on [billions in Pell Grant](#) aid that went unclaimed by eligible students in 2018.⁴³

Also, increasing need-based financial aid could reduce the likelihood of students having unmet need. Specifically, **institutions and states should prioritize need-based aid over so-called “merit” aid.** Congress should remove question 23, which asks about drug convictions, from the FAFSA and **remove the ban on Pell Grants for students who are incarcerated.** In addition to expanding who gets financial aid, Congress should increase what they get by **at least doubling the Pell Grant,** so that it covers at least half of the full cost of attendance at a public four-year university.

Finally, **federal and state policymakers must stop shortchanging Black, Latino, and low-income students and make greater investments in historically underfunded institutions, such as community colleges, minority-serving institutions, and public regional colleges and universities that enroll larger proportions of students of color and students from low-income backgrounds, so these institutions have more aid to give.** Together, these changes from institutions and policymakers could advance racial justice and equity by supporting the students who struggle the most to pay at a time when they need it the most.



APPENDIX:

SAMPLE PROFESSIONAL JUDGMENT SCENARIO

An independent student with dependents has a cost of attendance of \$15,000 and an expected family contribution of \$0 based on a family income of \$40,000 and a family size of three, with one family member in college. Need is calculated by subtracting the cost of attendance from a student's expected family contribution, so their need (maximum need-based aid they can receive) is \$15,000. This student has a Pell Grant of \$6,345 (max); \$1,000 in work-study funds; a Federal Supplemental Educational Opportunity Grant (FSEOG) of \$1,000; and a direct loan of \$6,655. That makes \$15,000 in total aid.

The student loses their job and their income is now expected to be \$20,000 for the upcoming year. Generally, a financial aid administrator would plug the student's revised expected income of \$20,000 into the expected family contribution formula in place of the \$40,000 used previously and recalculate the expected family contribution. But since the student's expected family contribution is already \$0, that won't yield any additional aid for the student. Another way to account for this student's change in circumstances would be to add some of the income protection allowance (IPA) to the cost of attendance, which would increase the student's need.

The IPA is an allowance for basic living expenses based on Bureau of Labor Statistics data on cost of living and spending patterns. The IPA this year is \$34,180 for a family of three with one member in college, and, in general, schools assume that 30% of the income protection allowance is for food, 22% for housing, 9% for transportation expenses, 16% for clothing and personal care, 11% for medical care, and 12% for other family consumption. The IPA is excluded from consideration when calculating the expected family contribution, because it is considered the bare minimum that a family needs to get by. So, if a family's income is less than the IPA, it is assumed that said family does not earn enough money to meet its basic needs, much less pay for college.

Now on to the professional judgment piece. This student's new income of \$20,000 is well below their IPA of \$34,180. A financial aid administrator could decide to increase the dependent care allowance portion of the cost of attendance to make up the difference. The student's \$20,000 income less the \$34,180 IPA = (\$14,180). The administrator could add that \$14,180 to the \$15,000 cost of attendance for a new cost of attendance of \$29,180. The student's need would now be \$29,180 (cost of attendance) - \$0 (expected family contribution) = \$29,180. The student was eligible for \$15,000 in aid, but would now be eligible for another \$14,180 in aid.

In this scenario, the student was already receiving the maximum Pell Grant, so there might not be additional grant aid. But the student could take on more direct loans, or if the institution has available work-study funds or FSEOG, the student could receive additional funds from those sources.

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ABOUT THE EDUCATION TRUST

The Education Trust is a national nonprofit that works to close opportunity gaps that disproportionately affect students of color and students from low-income families. Through our research and advocacy, Ed Trust supports efforts that expand excellence and equity in education from preschool through college; increase college access and completion, particularly for historically underserved students; engage diverse communities dedicated to education equity; and increase political and public will to act on equity issues.



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