


# Title IV Assorted Topics

Spring 2017

Joseph Massman  
Training Officer



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## Cash Management Issues





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## Disbursements and Payment Periods

- A disbursement occurs when Title IV funds are either credited towards the student's account ledger, or are paid directly to the student
  - Most schools disburse by crediting student accounts, rather than direct disbursement
- Title IV disbursements (except for Federal Work Study) are specifically associated with a payment period
  - For programs offered in standard terms, as well as most non-standard term credit-hour programs, the payment period is the **term**
- Disbursements made by crediting student accounts must generally be applied to the charges for the payment period (term) with which the disbursement is associated



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### Allowable Charges

- Funds can only be disbursed to cover **allowable charges**:

Current charges for tuition and fees	Current charges for room and board (if provided by the school)
Book, supplies, and other educationally-related expenses, <u>only with written authorization</u>	Prior-year charges not exceeding \$200

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### Prior-Year Charges

- To understand what is considered a "prior-year," it is important to understand what is meant by the current "year"

Package contains <u>no</u> loans	<ul style="list-style-type: none"> <li>The current "year" is the current award year</li> </ul>
Package contains <u>only</u> loans	<ul style="list-style-type: none"> <li>The current "year" is the current loan period</li> </ul>
Package contains <u>both</u> loans and other aid	<ul style="list-style-type: none"> <li>The current "year" is the current academic year <u>or</u> loan period</li> <li>School may determine</li> </ul>

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### Current Year (but not current term) Charges

- An exception is made for outstanding charges from a previous term **within the current "year"**
- 34 C.F.R. § 668.164 (c)(4): *An institution may include in the current payment period unpaid allowable charges from any previous payment period in the current award year or current loan period for which the student was eligible for title IV, HEA program funds.*

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## Examples

- School uses standard term semesters
- School charges by the term
- Year starts in the fall, includes fall and spring semesters, with summer as a trailer



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## Examples: Prior-Year Balances

Scenario  
*Student has remaining Title IV aid after covering fall semester charges, but has an outstanding balance from the summer semester*

- If the remaining fall aid is comprised of Title IV funds and is less than \$200, the school may use the remaining funds to pay the summer balance
- If the remaining fall aid is comprised of Title IV funds and is more than \$200, the school may credit up to \$200 of the remaining funds toward the summer balance and must pay the rest to the student

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## Examples: Current-Year Balances

Scenario  
*Student has remaining Title IV aid after covering spring semester charges, but has an outstanding balance from the fall semester*

- Must use spring disbursement(s) to cover spring charges first, then may credit any remaining funds to cover the current-year balance remaining from fall semester

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## Examples: Current-Year Balances

### Scenario

*Student has remaining Title IV aid after covering fall semester charges, but owes for spring semester*

- Fall and spring disbursements must first be applied to the payment period (term) with which they are associated
- Remaining fall funds are considered a credit balance that must be paid to the student within 14 days
  - 34 C.F.R. § 668.164 (c)(4) specifically applies to "previous" payment periods
- School may potentially retain fall credit balance and apply it toward spring charges, but only with voluntary written authorization from the student

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## Resources

- FSA Handbook
  - Volume 4, Chapter 2 (Disbursing FSA Funds)
- FSA Assessments
  - Fiscal Management Module (Activity 7)
- 34 C.F.R. § 668.164

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## Loan Issues



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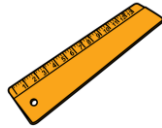
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## Annual Loan Limits

- Annual loan limits tied to a school-defined academic year
- School defines the academic year for each program, but the defined academic year must be at least as long as the statutory minimums
- Programs themselves may be shorter or longer than the defined academic year, but annual loan limits are still based upon the academic year



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## Statutory Definition of an Academic Year

Academic Progress Measured By:	Minimum Completion Requirement*	Minimum Instructional Time Requirement
Semester hours	24 semester hours	30 weeks
Trimester hours	24 trimester hours	30 weeks
Quarter hours	36 quarter hours	30 weeks
Clock hours	900 clock hours	26 weeks

\* Number of hours that a student enrolled full time is expected to complete in a full academic year.

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## Defined AY vs. SAY or BBAY

- The school defines an Academic Year for the program of study. This is a "measuring stick" used in defining the program for Title IV purposes
- Loans are actually awarded and disbursed using a Scheduled Academic Year (SAY) or a Borrower-Based Academic Year (BBAY).
- The defined Academic Year and the expressed SAY or BBAY are separate (but linked) concepts
  - These may be the same amount of time
  - These may be different amounts of time
    - For example, a school defines the academic year as 32 weeks. It uses a SAY starting in the fall. Summer is a trailer. The SAY, if it includes summer, will be several weeks longer than the defined AY

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## Grade Level Progression



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## Grade Level Progression

- Do not confuse grade level progression with eligibility for a new annual loan limit
- Completion of credits determines grade level progression
- Schools may develop their own grade level standards but at a minimum must equal the minimum academic year definition
- Students in standard or nonstandard SE9W programs who advance to a higher grade level within an academic year may receive additional funds

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## Grade Level Progression - Example

- School uses standard term semesters, each semester is 15 weeks in length
- Program consists of 120 credit hours, usually completed over 4 years
- School defines academic year as 24 credits and 30 weeks
  - 2 15-week semesters
- The school defines grade levels as follows:
  - 0-29 credits: Grade level 1
  - 30-59 credits: Grade level 2
  - 60-89 credits: Grade level 3
  - 90+ credits: Grade level 4

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## Grade Level Progression - Example

- Deb is a dependent undergraduate student
- She completed a total of 18 semester credit hours in the 2015–16 academic year
- She began the 2016–17 academic year by completing 12 semester credit hours in the fall term
- At the beginning of the spring term of 2016–17, she had completed 30 credits – enough to progress to grade level 2
- As a result, she is eligible for the annual loan limit permitted for grade level 2 during that loan period. To accommodate this, the school may increase the spring term disbursement to reflect the difference in the grade level 1 and grade level 2 loan limits (assuming the student's need and COA accommodate this increase)

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## Example – Year 1

Grade Level 1 Annual Loan Limit	Fall Term 2015–16 (Grade Level 1) Enrolled: 9 credits	Spring Term 2015–16 (Grade Level 1) Enrolled: 9 credits
DL Subsidized: \$3,500	DL Subsidized: \$1,750	DL Subsidized: \$1,750
DL Unsubsidized: \$2,000	DL Unsubsidized: \$1,000	DL Unsubsidized: \$1,000
	End of Term Total: 9 cumulative credits	End of Term Total: 18 cumulative credits

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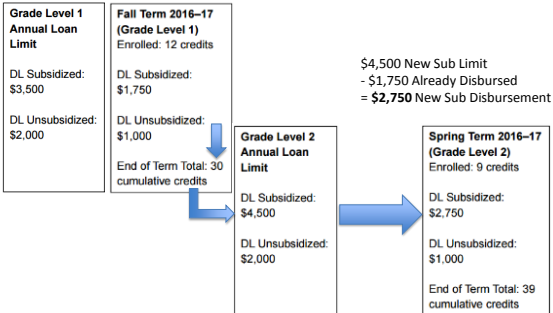
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## Example – Year 2



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## Example – School Follow-up

- The school is not required to automatically increase the Spring 2016-17 subsidized loan disbursement
- However, the school **must** notify the student of their increased loan eligibility
- If the student accepts the increased loan, the school must process the request
- If the student does not request the increased loan, there is no requirement for the school to retroactively reallocate unsub into sub to reflect the increased sub eligibility

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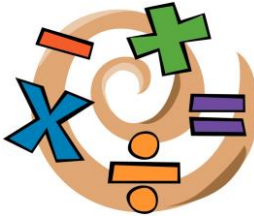
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## Loan Proration



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## Prorating Annual Loan Limits

Annual loan limits must be prorated when

The student is enrolled in a program that is shorter than a full academic year

OR

The student is enrolled in a remaining period of study shorter than a full academic year

- The total academic program contains fewer hours or weeks than in the school's defined academic year

- For standard and non-standard SE9W terms, the remaining period contains fewer terms than in the school's defined academic year
- For clock-hour, non-term, and non-standard non-SE9W programs, the remaining period contains fewer hours than in the school's defined academic year

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## Loan Proration

- Prorated loan limits are then used in the awarding process to determine student eligibility
- Proration is NOT required for
  - PLUS loans
  - Graduate students
  - Teacher certification
  - Preparatory coursework

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## Prorating for a Program Shorter Than a Full Academic Year

Multiply the applicable loan limit by the lesser of:

$$\frac{\text{Hours enrolled in program}}{\text{Hours in the defined academic year}}$$

Or

$$\frac{\text{Weeks enrolled in program}}{\text{Weeks in the defined academic year}}$$

- The base amount and the additional unsub amounts must be prorated **separately**

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## Program Shorter Than an Academic Year

Program Length is 22 credit-hours and 28 weeks  
Defined academic year is 24 credit-hours and 30 weeks

Credits  $\frac{22}{24} = .92$       Weeks  $\frac{28}{30} = .93$

Annual Base Amount	Annual Unsubsidized (above base)
$\$3,500 \times \frac{22}{24} = \$3,208$	$\$2,000 \times \frac{22}{24} = \$1,833$ dependent
	$\$6,000 \times \frac{22}{24} = \$5,500$ independent

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## Prorating Remaining Periods Shorter than an Academic Year

Multiply the applicable loan limit by:

$$\frac{\text{Hours remaining in program of study}}{\text{Hours required for defined Academic Year}}$$

**Note: Unlike proration for programs shorter than an academic year, only the hours are used**

- The base amount and the additional unsub amounts must still be prorated **separately**

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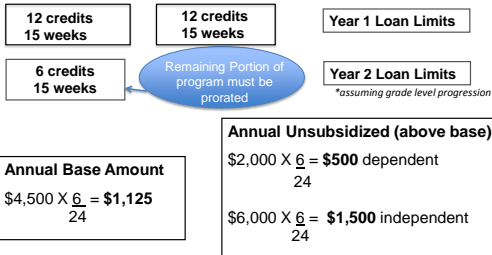
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## Remaining Periods Shorter Than an AY

Program length is 30 semester credit-hours and 45 weeks

Academic year defined as 24 credit-hours and 30 weeks



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## Considerations

- Proration for periods of study shorter than full academic year only required when known by the school in advance
- No retroactive proration required when student originally enrolls for full year but completes program earlier

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### Proration for Short Final Periods – Scenario 1

- 4-year term-based credit hour program, using semester standard terms
- Academic Year defined as 24 semester credits and 30 weeks
- Student has 15 remaining credits in the program going in to the award year
- Prior to packaging, student enrolls 9 credits fall semester and 6 credits spring semester
- Proration is **not** required
- Student later adds 6 credits in fall, and applies to graduate at the end of fall
- Proration is **still** not required

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### Proration for Short Final Periods – Scenario 2

- 4-year term-based credit hour program, using semester standard terms
- Academic Year defined as 24 semester credits and 30 weeks
- Student has 15 remaining credits in the program going in to the award year
- Prior to packaging, student enrolls in 15 credits and applies to graduate at the end of fall
- Loans must be prorated

Annual Base Amount	Add'l Unsub (Dep.)	Add'l Unsub (Ind.)
$\$5,500 \times \frac{15}{24} = \$3,438$	$\$2,000 \times \frac{15}{24} = \$1,250$	$\$7,000 \times \frac{15}{24} = \$4,375$

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### Single Term Loans



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## Single Term Loans

- A single term loan is one with a loan period of just one semester, trimester or quarter
  - Only available with standard terms or SE9W nonstandard terms
- Multiple disbursements are required (unless school is exempt due to low cohort default rates)
  - 1<sup>st</sup> disbursement near beginning of term, 2<sup>nd</sup> disbursement at calendar midpoint
- Report the loan period as the term
- The reported academic year must include the number of terms in your AY
  - A reported academic year consisting of a single term is **never** correct!
- Student cannot begin a new annual loan limit until a full academic year has passed, even if the student borrows their annual limit in one term

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## Calculating Single Term Loans

- Calculating a single term loan is a different process from loan proration
  - Proration only occurs for 1) programs shorter than an AY and 2) final periods of enrollment shorter than an AY
- Simply dividing the normal annual loan limit by the number of terms in your academic year is **not** correct
- Must use COA, EFC and EFA associated with **only** that one term to calculate loan eligibility
  - The COA that reflects the costs incurred during the loan period
  - The EFC that most reasonably corresponds to the number of months in the loan period must be used to award the loan
  - Student may potentially receive up to full annual loan limit, *if* accommodated by need and COA

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## Single Term Loans – Example

- Independent student is enrolled year 2 of a 4-year program
- Student qualifies for grade level 2 loans
- Student requests a one-term loan for the fall term (4 months)
- Full-year COA 18,000, 4-month COA is 8,000
- 9-month EFC is 9,000, 4-month EFC is 4,000
- Student is receiving no other assistance

### 1) Subsidized loan eligibility

8,000 COA (4-month)

- 4,000 EFC (4-month)

4,000 sub loan eligibility

### 2) Unsubsidized loan eligibility

8,000 COA (4-month)

- 4,000 EFA (the sub loan)

4,000 unsub loan eligibility

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## Resources

- FSA Handbook
  - Volume 3, Chapter 5 (Direct Loan Periods and Amounts)
- FSA Assessments

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## Cost of Attendance



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## Cost of Attendance

- Some scholarship programs award funds based on academic merit or the student's field of study
- "Need-based" grants, loans, and work-study are based on the family's demonstrated financial need for assistance
- The cost of attendance (COA) is a key component of establishing a student's financial need ( $COA - EFC = \text{Need}$ )
- COA is one of the basic components of the Pell Grant calculation
- COA also sets an overall limit on the total aid that a student may receive for purposes of the Campus-Based programs, Direct Loans (Subsidized, Unsubsidized, and PLUS), and TEACH Grants
- COA establishes costs for different categories of students, and ensures consistent treatment of applicants

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## More About COA

- Remember that COA means *allowable* educationally-related expenses, not what students actually pay the school
- COA must be based upon average expenses of **all** students at the school, not just aid recipients
- School must review and update COA each award year
- Must research a variety of data sources to arrive at reasonable, realistic figures for each COA component

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## Two Important COA Decisions

Identify groups of students that will use the same COA

Set reasonable amounts for each budget component



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## Considerations for Student Categories

- Education level (year in school)
- Enrollment status
- Program of study
- Residency status (in-state/out-of-state, etc.)
- Housing type (with parents, on-campus, off-campus)
- Supporting dependents?
- Special needs



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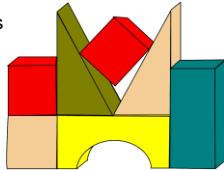
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## COA Components

Allowable costs are determined by the school, taking into account elements including (but not limited to) the following:

- Tuition and fees
- Books and supplies
- Room and board
- Transportation
- Personal/miscellaneous expenses
- Loan fees
- Dependent care
- Study abroad expenses
- Disability expenses



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## Components and Data Sources

### Tuition and Fees

- Can use actual tuition figures
- Can compute average tuition (# of credits, enrollment tier)
- *Cannot* simply estimate using current year's amounts
- Suggested sources:
  - School Business Office
  - School catalog (published fees and equipment for specific programs)

### Books and Supplies

- Can use actual costs
- Can compute average costs by program
- Suggested sources:
  - Campus bookstore staff, other bookstores
  - School catalog (published information on books needed for specific programs/courses)
  - Internet sources

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## Components and Data Sources

### Room and Board

- Categories:
  - On-campus
  - Off-campus with parents
  - Off-campus not with parents
- Suggested sources:
  - School housing office
  - Fraternities/sororities
  - Campus survey of student housing and food costs
  - Data from nearby schools
  - Newspaper ads and rental agency listings for apartments/rental houses
  - Cost data from service agencies such as American College Testing (ACT) and College Scholarship Service (CSS)
  - U.S. Census Bureau data: <http://www.census.gov/quickfacts/table/PST045215/00>
  - U.S. Department of Agriculture food costs:
    - <http://www.cnpp.usda.gov/USDAFoodPlansCostofFood/reports>
    - Updated monthly

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## Census Bureau Data

Enter state, county, city, town, or zip code

SELECT A FACT

TABLE MAP CHART DASHBOARD

Table

ALL TOPICS

UNITED STATES DENVER CITY, COLORADO COLORADO

Housing	UNITED STATES	DENVER CITY, COLORADO	COLORADO
Housing units, July 1, 2015, (V2015)	134,788,944	X	2,309,228
Housing units, April 1, 2010	131,704,730	285,797	2,212,898
Owner-occupied housing unit rate, 2011-2015	63.9%	49.4%	64.3%
Median value of owner-occupied housing units, 2011-2015	\$178,000	\$271,300	\$247,000
Median selected monthly owner costs—with a mortgage, 2011-2015	\$1,482	\$1,569	\$1,577
Median selected monthly owner costs—without a mortgage, 2011-2015	\$458	\$418	\$419
Median gross rent, 2011-2015	\$620	\$952	\$1,002
Unsheltered population, 2015	1,182,582		31,871

<http://www.census.gov/quickfacts/table/PST045215/00>

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## USDA Food Cost Data

Official USDA Food Plans: Cost of Food at Home at Four Levels,  
U.S. Average, December 2016<sup>1</sup>

Age-grader groups	Weekly cost <sup>1</sup>			Monthly cost <sup>1</sup>		
	Thrifty plan	Low-cost plan	Moderate-cost plan	Thrifty plan	Low-cost plan	Moderate-cost plan
<b>Individuals<sup>2</sup></b>						
<b>Child:</b>						
1 year	\$21.50	\$28.70	\$32.60	\$39.80	\$93.10	\$124.30
2-3 years	\$23.60	\$30.10	\$36.30	\$44.20	\$102.10	\$137.20
4-5 years	\$24.70	\$31.10	\$38.60	\$47.20	\$106.00	\$144.50
6-8 years	\$31.40	\$43.00	\$52.70	\$62.50	\$138.00	\$188.80
9-13 years	\$35.40	\$47.20	\$61.10	\$71.10	\$153.50	\$204.60
<b>Male:</b>						
12-13 years	\$38.20	\$54.20	\$68.00	\$79.70	\$165.50	\$234.70
14-18 years	\$39.30	\$54.90	\$70.00	\$80.20	\$170.10	\$238.00
19-50 years	\$42.20	\$54.00	\$68.50	\$84.30	\$181.10	\$236.70
51-70 years	\$38.20	\$51.50	\$64.00	\$77.50	\$166.90	\$223.30
71+ years	\$38.80	\$50.90	\$63.20	\$78.20	\$168.30	\$220.70
<b>Female:</b>						
12-13 years	\$38.20	\$46.00	\$56.30	\$68.00	\$165.40	\$202.10
14-18 years	\$37.50	\$46.00	\$56.50	\$69.60	\$162.50	\$202.10
19-50 years	\$37.50	\$47.30	\$58.50	\$74.80	\$162.50	\$201.10
51-70 years	\$37.10	\$46.10	\$57.50	\$69.40	\$160.00	\$199.70
71+ years	\$36.10	\$43.00	\$56.60	\$68.40	\$156.30	\$197.40

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## Components and Data Sources

### Transportation

- Consider both travel to the student's home, and local transportation
- Suggested sources for travel to the student's home:
  - Airlines, train and bus companies
  - Internet sources
- Suggested sources for local transportation:
  - Your school's mileage allowance for employee
  - IRS mileage allowance
  - Fare schedules of local transit agencies



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## Components and Data Sources

### Personal/miscellaneous expenses

- Suggested sources:
  - Student expense survey
  - Professional association research on expenses
  - Data from nearby schools

### Loan fees

- Can use exact fees for each student
- Can calculate average loan fees
- Suggested sources:
  - Financial aid office records on loan amounts
  - Loan fee information can be found on IFAP

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## Components and Data Sources

### Dependent care

- Suggested sources:
  - Local public or private off-campus care facilities
  - School's schedule of fees for on-campus child care
  - Local social service agencies and child care services
  - Student records of expenses
  - USDA childcare expenses calculator
    - [http://www.cnpp.usda.gov/tools/CRC\\_Calculator/default.aspx](http://www.cnpp.usda.gov/tools/CRC_Calculator/default.aspx)

### Disability expenses

- Suggested sources:
  - School's disability services office
  - State vocational/rehabilitation agencies
  - Student records of expenses

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## USDA Child Cost Calculator

**USDA Cost of Raising a Child Calculator**  
Please select from the lists below.

**Child's Name (Optional)**

Age of First Child:  Please Select an Age...  
 Age of Second Child:  (I Just Have 1 Child)  
 Age of Third Child:  (I Don't Have 3 Children)  
 Age of Fourth Child:  (I Don't Have 4 Children)  
 Age of Fifth Child:  (I Don't Have 5 Children)  
 Age of Sixth Child:  (I Don't Have 6 Children)

My Family is Single or Two-Parent Household?  Then Parents  
 Please Select a Region:

What is Your Annual Before-Tax Household Income?  Please Select an Income Group.  
 Please Select a Region:

[http://www.cnpp.usda.gov/tools/CRC\\_Calculator/default.aspx](http://www.cnpp.usda.gov/tools/CRC_Calculator/default.aspx)

**Overall Estimated Annual Costs**

**Your Results**

Bar chart showing Annual Estimated Costs for various categories: Housing, Food, Transportation, Child Care and Education, Health Care, Child Care and Education, Other. The chart compares your results (blue bars) with the National Average (green bars).

**Overall Annual Estimated Costs**

Household Type - One Parent and Income - Less Than \$15,000

Category	Estimated Annual Costs	Child Care and Education	Total
Housing	\$1,210	\$1,210	\$2,420
Food	\$1,700	\$1,700	\$3,400
Transportation	\$1,000	\$1,000	\$2,000
Child Care and Education	\$1,170	\$1,170	\$2,340
Health Care	\$1,170	\$1,170	\$2,340
Other	\$1,170	\$1,170	\$2,340
<b>Total</b>	<b>\$8,850</b>	<b>\$8,850</b>	<b>\$17,700</b>

**Final Child's Estimated Annual Costs**

Age of Child: 3

Category	Estimated Annual Costs	Child Care and Education	Total
Housing	\$1,210	\$1,210	\$2,420
Food	\$1,700	\$1,700	\$3,400
Transportation	\$1,000	\$1,000	\$2,000
Child Care and Education	\$1,170	\$1,170	\$2,340
Health Care	\$1,170	\$1,170	\$2,340
Other	\$1,170	\$1,170	\$2,340
<b>Total</b>	<b>\$8,850</b>	<b>\$8,850</b>	<b>\$17,700</b>

**Nearest Child's Estimated Annual Costs**

Age of Child: < 1

Category	Estimated Annual Costs	Child Care and Education	Total
Housing	\$1,210	\$1,210	\$2,420
Food	\$1,700	\$1,700	\$3,400
Transportation	\$1,000	\$1,000	\$2,000
Child Care and Education	\$1,170	\$1,170	\$2,340
Health Care	\$1,170	\$1,170	\$2,340
Other	\$1,170	\$1,170	\$2,340
<b>Total</b>	<b>\$8,850</b>	<b>\$8,850</b>	<b>\$17,700</b>


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## Less than Half-Time

For students who are less than half-time, COA can include only the following components:

- Tuition and fees
- Books and supplies
- Transportation
- Dependent care expenses
- A limited allowance for room and board
  - Up to 3 semesters (or the equivalent)
  - Cannot be more than 2 consecutive semesters



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## Costs for Periods Other than 9 Months

- Pell is always based upon a full-time, full-year COA and a 9-month EFC.
  - The Pell chart/Pell calculation handles proration of Pell awards
- For all other Title IV programs, COA and EFC must reflect the student's **actual period of enrollment**
  - Higher EFC/COA for more than 9 months (e.g., summer term)
  - Lower EFC/COA for less than 9 months (e.g., one term)
  - EFC table with other-than-9-month EFCs is provided on the ISIR
  - Prorate/calculate COA for other than 9 months in any reasonable, consistent way

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## Costs Waived or Paid by Other Sources

Q: What do you do when one or more components of the COA are partially/fully waived or paid by another non-Federal source?

A: Base your COA on what the school actually charges the student (regardless of how those expenses are covered)

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## Other COA Considerations

- Lab fees
- Program fees
- One-time costs (e.g., computer purchase)
- Professional judgment
  - Can increase a student's COA to reflect unusual expenses, exceptional circumstances
  - As with any PJ intervention by a school, must be done on a **case-by-case** basis and must be supported by thorough **documentation**
- Are you making a lot of mid-year adjustments?
  - If so, perhaps you should revisit your COA amounts, categories

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## Additional COA Resources

- FSA Handbook
  - Volume 3, Chapter 2 (Cost of Attendance)
- Higher Education Act
  - Section 472 – Statutory list of allowable COA components
- FSA Assessments
- Colleagues from other schools

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## Professional Judgment (and other special cases)



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## PJ Restrictions

- May not carry forward a PJ from one award year to another unless subsequent requests are made and subsequent documentation obtained (if additional documentation is necessary)
  - A professional judgment decision is award-year specific
- May not **directly** change an EFC
- May not make changes to the actual EFC formula
- May not establish automatic categories of special circumstances and provide identical outcomes to all students in that circumstance. All professional judgment decisions must be conducted on a case-by-case basis

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## PJ Restrictions (continued)

- May not use professional judgment to circumvent the regulations or the law
- May not use professional judgment to waive student eligibility requirements
- May not use PJ to make an otherwise independent student dependent
  - Dependency overrides are a one-way option from dependent to independent
- May not make a dependent student independent based solely on the student's demonstrated self-sufficiency
- May not make a dependent student independent based solely on the student not being claimed as a dependent on the parents' federal tax return.

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## Allowable PJ Adjustments

- Adjusting Components of Cost of Attendance
  - On a case-by-case basis, a determination that one or more of the components in a student's COA is not accurate for that student's situation. The PJ action is to change the component(s) to more accurately reflect the student's situation.
  - *Federal Student Aid Handbook—AVG, Chapter 5*
  - *HEA Sec. 479A(a)*
- Adjusting Data Elements Used to Calculate EFC
  - On a case-by-case basis, a determination that one or more of the elements used to calculate a student's EFC is not accurate for that student. The PJ action is to change the value of the element(s) in the EFC formula and recalculate. The EFC itself cannot directly be changed.
  - *Federal Student Aid Handbook—AVG, Chapter 5*
  - *HEA Sec. 479A(a)*

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## Dependency Overrides

- On a case-by-case basis, a determination that an otherwise dependent student should not be considered dependent for Title IV purposes. The action is to override the dependency status and make the student independent.
- This action is to be used when unusual circumstances exist. You may not make the student independent due to:
  - Student's financial self-sufficiency
  - Student not being claimed as a dependent on parents' federal tax return
  - Parents' refusal to complete FAFSA
  - Parents' refusal to provide verification documents
- *Federal Student Aid Handbook—AVG, Chapter 5*
- *Dear Colleague Letter GEN-11-15*
- *HEA Sec. 480(d)(7)*

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## Special Circumstances

- On a case-by-case basis, a determination that a dependent student whose parents refuse to complete a FAFSA may still be eligible for limited aid
  - School must document the parents' refusal to complete the FAFSA, **and**
  - School must obtain a written statement that the parents do not provide any support to the student
- The student may receive **ONLY** an Unsubsidized loan up to the dependent student annual limit. No other federal student aid is allowed.
- This is not a dependency override
- *Federal Student Aid Handbook—AVG, Chapter 5*
- *Dear Colleague Letter GEN 08-12*
- *HEA Sec. 479A*

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## Denying or Reducing a Loan

- On a case-by-case basis, a determination that an otherwise eligible borrower will not be allowed to borrow the full amount he/she is eligible for. The PJ action is to either originate a loan at a lesser amount, or to not originate a loan at all.
- This decision must be based upon a reason that is not discriminatory, and must be provided in writing to the student (or parent, if for a parent PLUS Loan)
- *Federal Student Aid Handbook—AVG, Chapter 5*
- *Dear Colleague Letter GEN-11-07*
- *34 C.F.R. § 685.301(a)(8)*
- *HEA Sec. 479A(c)*

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## Some Things to Keep in Mind

- PJ and special case decisions must always be made on a case-by-case basis
- PJ and special case decisions must be thoroughly documented
  - State the decision that was made (to approve or deny)
  - Provide the documentation upon which the decision was made
  - State the specific adjustment(s) made (if any)
- PJs and special case decisions are award-year-specific
- School must maintain written policies and procedures, and must apply them consistently
- If the student was selected for Verification, must complete verification before processing a PJ
- If you make changes due to a PJ, you **must** set the FAA Adjustment flag in CPS

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## School's Discretion

- A school always has the right to decline a request for a PJ or special case determination
  - Students cannot appeal the school's decision to the Department
- If a student who received a PJ transfers in the middle of an award year, the receiving school has several options:
  - Accept the PJ granted by the previous school
    - Must obtain the PJ documentation from the previous school
  - Refuse to accept the PJ granted by the previous school
  - Require the student to re-submit a PJ request for consideration by the new school

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## Contacts

- Chicago/Denver School Participation Division
  - Main Number: 312-730-1511
  - Effie Barnett (IIS) 312-730-1587
  - George West (IIS) 312-730-1538
- Denver Training Officer
  - Joseph Massman 303-844-0432
- Email – firstname.lastname@ed.gov



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## Training Feedback

To ensure quality training we ask all participants to please fill out an online session evaluation

- Go to <https://www.surveymonkey.com/s/Massman>
- Evaluation form is specific to Joseph Massman
- This feedback tool will provide a means to educate and inform areas for improvement and support an effective process for "listening" to our customers
- Additional feedback about training can be directed to JoAnn.Borel@ed.gov; 409-579-3776

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## Questions?

Contact me with follow-up questions about this session:

Joseph Massman, Federal Training Officer  
[Joseph.Massman@ed.gov](mailto:Joseph.Massman@ed.gov); 303-844-0432



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