

FAFSA Simplification:



More than just SAI!

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Presenters



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More Than Just the SAI

- Cost of Attendance
- Professional Judgement
- Dependency
- Odds and Ends



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Cost of Attendance

What is the Cost of Attendance?

Student budgets are designed to provide students with an accurate projection of reasonable costs and to enable the financial aid office to formulate an appropriate aid package.

How do we get here?

- Created 1980
- Tweaked during subsequent reauthorizations
- Congress forbade DE regulation of COA 1986
- Consolidated Appropriates Act reinstated DE authorization to regulate, effective 2024-25.



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Cost of Attendance

• Basic COA Components

- Tuition and fees
- Living expenses, including housing and food*
- Books, course materials, supplies, and equipment, including a reasonable allowance for the documented rental or upfront purchase of a personal computer, as determined by the institution.*
- Transportation*
- Miscellaneous personal expenses

**denotes regulatory change*



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Cost of Attendance

• Additional COA Components

- Costs associated with obtaining a license, certification, or a first professional credential, for a student in a program that prepares them to enter a profession that requires such a qualification+
- Federal educational loan fees*
- Dependent care expenses
- Disability-related expenses
- Cooperative education program expenses
- Study abroad expenses

**denotes regulatory change
+new regulation*



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Cost of Attendance

- **Consolidated Appropriation Act Changes – Language**
 - Books & Supplies now **Books, Course Materials, Supplies, & Equipment**
 - Room & Board now **Living Expenses**
 - Room now **Housing**; Board now **Food**



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Cost of Attendance

- **Consolidated Appropriation Act Changes – Logistics**
 - Books, Course Materials, Supplies, & Equipment; Transportation; and Miscellaneous Personal Expenses become required separate COA elements
 - Rental/purchase of equipment/materials/supplies moved to from Tuition & Fees to Books, Course Materials, Supplies, & Equipment
 - Transportation may now include mileage to student's place of work
 - Cost of obtaining a license, certification, first professional credential no longer restricted to one-time expense and now required
 - Course materials and cost of obtaining first license added to incarcerated COA



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Cost of Attendance

- **Consolidated Appropriation Act Changes – Logistics**
 - Non-Federal Loan Fees can no longer be included
 - Loan fees may still be actual or averaged, must be removed if declined
 - Less than half-time COA allows for co-op and computer expenses (personal allowance still excluded); Living Expenses remain an optional inclusion for up to 3 semesters, no more than 2 consecutive
 - Incarcerated COA must include Books, Course Materials, Supplies & Equipment and cost of obtaining professional credential
 - Institutions are required to make list of COA elements publicly available on any website describing tuition and fee



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Cost of Attendance

• Consolidated Appropriation Act Changes – Living Expenses

- Housing component must reflect median or average housing costs, whichever is greater.
- Off-campus and commuter student Housing must include rent/other housing costs.
- Housing must be separated by students on and off campus, with and without meal plan, and with or without dependents.
- Students living on military base receiving basic allowance (section 403(b) of title 37 US Code) must include Food in COA, but not Housing.
- Food must account for costs of 3 meals per day regardless of living situation.



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Cost of Attendance

• Implementation Challenges

- Housing & Food allowances no longer reflect any dorm room and meal plan costs, making out-of-pocket expenses higher than actual for most freshmen.
- Difficulty determining majors with professional licensure/certification/credential and determining costs.
- Federal Loan Fee removal if loans are declined added significant logic to COA programming.
- Determining who might be living on military base. May only be your online students.
- Others?



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Table Discussion

1. What are methods you've used at your institution to build your cost of attendance?
2. How will you determine housing? Have you used the field on the FAFSA before? If so, what will you be using now?
3. Does your campus have a meal plan that provides 21 meals a week? If not, how did you calculate your food component?

Please discuss at your table and be prepared to share out!



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Professional Judgement

- **Two defined categories of Professional Judgment**
 - **Special Circumstances**
 - Financial situations, like the loss of a job, that justify the adjustment of data elements in the COA or EFC calculation
 - **Unusual Circumstances**
 - Conditions that justify an aid administrator making an adjustment to a student's dependency status based on a unique situation (human trafficking, parental abandonment, incarceration, etc.) Also known as a Dependency Override.



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Professional Judgement

- Effective July 1, 2023, institutions may no longer have a blanket policy denying all Professional Judgment requests. May also not have a blanket approval process. Each situation must be individually reviewed.
- Must have a "reasonable approach" to reviewing all special circumstance requests on a case-by-case basis
- Now required to publicly disclose that students may request an adjustment based on special or unusual circumstances
- Method of disclosure is not prescribed



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STEPHENS COLLEGE Academics Admissions + Aid Student Experience After Stephens

Special and Unusual Circumstances

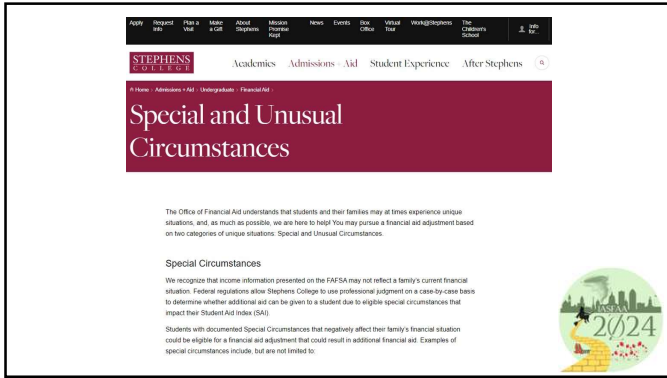
The Office of Financial Aid understands that students and their families may at times experience unique situations, and, as much as possible, we are here to help! You may pursue a financial aid adjustment based on two categories of unique situations:

[Special and Unusual Circumstances >](#)

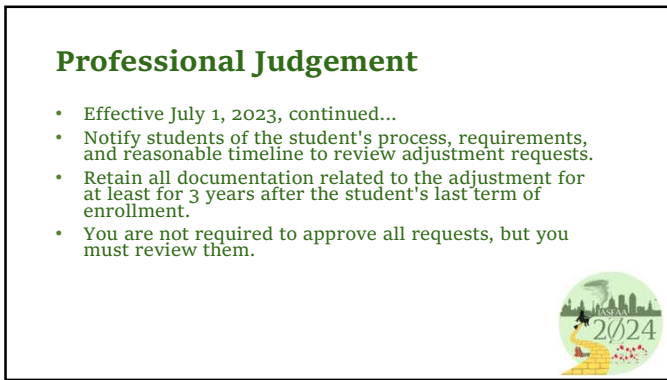
Institutional Merit and Athletic Scholarships

- [Scholarships for First-Year Students >](#)
- [Scholarships for Transfer Students >](#)

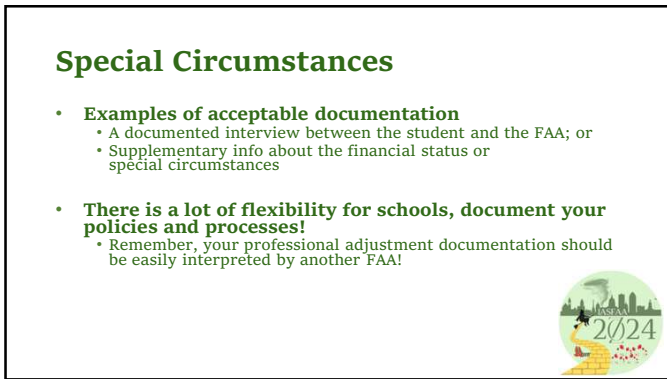
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Special Circumstances in Unprecedented Times

- Guidance previously issued by ED in DCLs was written into law regarding a disaster, emergency, or economic downturn
- During a qualifying emergency
 - An aid administrator may use documentation of unemployment benefits or an application for unemployment benefits to determine income earned from work is zero
 - Documentation from unemployment should not be more than 90 days past the date it was issued, but you may make exceptions



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Unusual Circumstances

- Public disclosure
- FAA determinations at another school
 - Same or prior award year
- Notification to students
 - Go days
- Final determination timeline
- Status rollover



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Unusual Circumstances

- Documentation could include:
 - A documented interview between the student and the FAA
 - Submission of a court order or official Federal or State documentation that the student's parent(s) or legal guardian(s) are incarcerated
 - Call or written statement from an attorney, GAL, CASA, TRIO or GEAR UP representative, State welfare agency, or an independent living case worker who supports current and former foster youth
 - Documented determination made by another FAA at another institution in the same or a prior award year
 - Utility bills, health insurance, or other documents that demonstrate a separation from parent(s) or legal guardian(s)



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Unaccompanied Homeless Youth

- Timing
- Renewal applications
- Documentation
 - Homeless Liaison
 - Director of emergency or transitional shelter, street outreach program, homeless youth drop-in center, or other program serving individuals experiencing homelessness
 - Director of Federal TRIO or GEAR UP grant
 - FAA at another institution who documented the circumstances in the same or prior award year
- No documentation from above? FAA MUST make a determination.



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Foster Care Youth

- Timing
- Renewal applications
- Documentation
 - Court ordered or official State documentation that the student received Federal or State support in foster care
 - Call or written statement from attorney, GAL, or CASA
 - Verification of student's eligibility under the Chafee Foster Care Program
 - FAA at another institution who documented the circumstances in the same or prior award year
 - State, county, or Tribal agency administering a program under part B or E of Title IV of the Social Security Act
 - State Medicaid agency
 - Public or private foster care placing agency or foster care facility or placement



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Important Questions

- Can I ask a student if their unusual circumstances or homeless situation has changed each year?
- What if a student doesn't submit a dependency override request until more than 60 days after they enroll?
- What documentation is acceptable if an FAA chooses to accept a dependency override due to unusual circumstances made by an FAA at another school?



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Unusual Circumstances

- Incarcerated parents
- Provisional independent status
 - Notification
 - Final determination



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Table Discussion

1. How are you publicly disclosing that students can pursue a special/unusual circumstance?
2. What process has your institution created to ensure unusual circumstances are reviewed no later than 60 days after the student enrolls?
3. Will you consider an override made by an FAA at another school? Why or why not? If so, what kind of documentation would you require?



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What else?!

- FSA ID process for individuals without SSNs
- EFA is now OFA
 - Foster care benefits
 - Emergency financial assistance
- Requiring additional information
- Work-Study
- Pell Enrollment intensity
- Year-Round Pell



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Resources

- <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2022-11-04/fafsa-simplification-act-changes-implementation-2023-24>
- https://www.nasfaa.org/uploads/documents/FAFSA_Simplification_Implementation_Checklist.pdf
- https://www.nasfaa.org/uploads/documents/FAFSA_Simplification_Detail_Chart.pdf
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