



Richard Bland College

Professional Judgement Policy

Federal regulations allow limited exceptions or adjustments to information reported on the Free Application for Federal Student Aid (FAFSA). Such exceptions or adjustments, known as “Professional Judgment”. Professional Judgment requests are considered on a case-by-case basis based on supporting documentation of your circumstances. Whether any adjustments are made is at the sole discretion of the Financial Aid Office and cannot be appealed beyond the Financial Aid Office.

Purpose of a Professional Judgement Policy

The purpose of this policy is to establish guidelines for the use of professional judgment (PJ) by financial aid administrators in adjusting data elements on a student’s financial aid application or modifying cost of attendance (COA) components in accordance with applicable federal, state, and institutional regulations.

This policy ensures consistency, fairness, compliance, and appropriate documentation in all professional judgment decisions.

Regulatory Authority

Professional judgment decisions are made in accordance with:

- Higher Education Act of 1965, as amended
- U.S. Department of Education regulations and guidance
- Applicable state regulations
- Institutional policies

Definition of Professional Judgment

Professional judgment refers to the authority granted to financial aid administrators to make case-by-case adjustments to:

- Data elements used to calculate a student’s Student Aid Index (SAI) (formerly EFC)

- Cost of Attendance (COA) components
- Dependency status (in cases of unusual circumstances)
- Other aid-related determinations as permitted by law

All decisions must be:

- Made on an individual basis
- Supported by adequate documentation
- Not based on broad categories or across-the-board adjustments

Circumstances for Consideration

Professional judgment may be considered when a student or family experiences special or unusual circumstances, including but not limited to:

A. Special Circumstances (Income/COA Adjustments)

- Loss or reduction of employment income
- Death of a parent or spouse
- Divorce or separation
- One-time income not reflective of current financial condition
- Unusually high medical or dental expenses
- Natural disasters
- Homelessness or housing instability
- Significant dependent care expenses

B. Unusual Circumstances (Dependency Overrides)

- Abandonment by parents
- Abusive family environment
- Incarceration of parent(s)
- Human trafficking or refugee/asylee situations
- Other documented circumstances preventing parental contact or support

Application Process

Students requesting professional judgment consideration must:

1. Submit a written request explaining the circumstances.
2. Complete the institution's Special or Unusual Circumstance Request Form (Please call or email the Financial Aid Office to obtain the form. (804) 862-6260 or financialaid@rbc.edu).
3. Provide third-party documentation, which may include:
 - Termination letters
 - Pay stubs
 - Court documents
 - Medical bills
 - Statements from licensed professionals or social workers
 - Other relevant documentation

Incomplete requests will not be reviewed.

Review and Decision Process

- Requests are reviewed by a trained financial aid administrator.
- Decisions are made on a case-by-case basis.
- The administrator may request additional documentation.
- A written record of the decision, rationale, and supporting documentation will be maintained in the student's file.
- Decisions are final and not subject to appeal unless new documentation is provided.

Documentation Requirements

Each professional judgment decision must include:

- Student's written request
- Supporting documentation
- Summary of analysis performed
- Data elements adjusted (if applicable)

- Date of decision
- Name and title of reviewing administrator

All records will be retained in accordance with federal and institutional record retention policies

Prohibited Actions

Professional judgment may NOT be used to:

- Circumvent federal eligibility requirements
- Make across-the-board adjustments to categories of students
- Negate statutory definitions without documented justification
- Discriminate on the basis of race, gender, age, disability, religion, national origin, or other protected status

Review Process

- After all requested documents have been received by the financial aid office, a decision will be made within a few weeks or longer during peak times in the year.

Areas in which adjustments can be considered:

- Dependency Override: cases of parental abuse, neglect, abandonment, or incarceration
- Income Loss / Changes: loss of employment; changes to household income (either taxed, untaxed, reoccurring, or one-time / lump sum income); divorce, separation, death of household income-earner, etc.
- Excessive Medical Expenses: excessive out of pocket medical expenses that exceed 11% of the tax-filer's adjusted gross income (AGI)
- Increases in the students' Cost of Attendance: extraordinary educational expenses incurred by students while attending RBC
- Enrollment of additional students in college
- Excessive Dependent Care Cost

The following are areas that generally are not considered:

- Circumstances when the information on the FAFSA has already resulted in an Expected Family Contribution (EFC) or Student Aid Index (SAI) of zero or lower
- Loss of overtime or bonus income
- Fluctuations in investment/rental income, self-employment or business income
- Costs and fees associated with bankruptcies, foreclosures or debt collections
- Consumer debt such as credit cards, car payments, mortgages and other loans
- Payments on back taxes owed to the IRS or state department of revenue
- Lottery or gambling winnings or losses
- Family size that includes more than one sibling in college

All correspondence from our office will be through email to the student's RBC or personal email account.

When to Submit the Unusual Circumstance Form

Dependency Override (Unusual Circumstance)

- **Dependency Override Initial Request (first time submitted to the Financial Aid Office):** cases of parental abuse, neglect, abandonment, or incarceration
 - Dependency Override Circumstances that may be considered: cases of parental abuse, neglect, abandonment, or incarceration
 - Dependency Override Circumstances that cannot be considered: parent refusal to provide information on the FAFSA (students under the age of 24 are typically considered dependent and require parent information on the FAFSA); parent refusal to provide financial support; student being financially self-sufficient
 - Future Supporting Documentation Requests may include official court documents; two supporting letters of documentation from objective individuals with first-hand / direct knowledge of the situation (i.e. individuals who are not relatives or friends)

- Dependency Override Renewal (approved by the Financial Aid Office in previous academic years)
- Complete and submit the Unusual Circumstance Form by contacting the Financial Aid Office at (804) 862-6260 or by email financialaid@rbc.edu

When to Submit the Special Circumstance Form

- Income Loss / Changes or Excessive Medical Expenses (Special Circumstance)
- Income Loss / Changes
 - Income Loss / Changes Circumstances that can be considered: loss of employment; changes to household income (either taxed, untaxed, reoccurring, or one-time / lump sum income); divorce, separation, death of household income-earner, etc.
 - Income Loss / Changes Circumstances that cannot be considered: credit card debt; car payments; mortgage payments; existing student (or parent) loan debt; other forms of consumer debt
 - Future Supporting Documentation Requests may include Federal Tax-Transcript / Returns; W-2s; final paystubs; official termination / separation letters; official divorce/separation agreement or death certificate
- Excessive Medical Expenses
 - Excessive Medical Expense Circumstances that can be considered: excessive out of pocket medical expenses that exceed 11% of the tax-filer's adjusted gross income (AGI)
 - Excessive Medical Expense Circumstances that cannot be considered: medical expenses paid by insurance or others
 - Future Supporting Documentation Requests may include only Explanation of Benefits statement (EOBs) from insurance providers detailing out of pocket medical expenses will be accepted
- Complete and submit the Special Circumstance form by contacting the Financial Aid Office at (804) 862-6260 or by email financialaid@rbc.edu

Cost of Attendance Adjustments

The Cost of Attendance (COA) is an **estimate** of the total amount of your educational expenses for the period of enrollment during the Award Year and is reflected on your financial aid Award. The COA is based on your enrollment status and level, whether you are a Virginia resident, your program of study, and whether you live on or off campus while attending the College. Your assigned Fall & Spring COA **initially assumes** full-time enrollment and includes:

- Tuition
- Fees
- Books, course materials, supplies, & equipment
- Housing
- Food
- Transportation
- Miscellaneous Living Expenses

Students may request an increase in their Financial Aid COA by contacting the Financial Aid Office Directly. If approved, the increase typically allows the student to borrow additional loan funds, subject to annual loan limits and/or credit approval (for PLUS or private loans).

Because COA increases must typically be determined after an expense is incurred, students may wish to contact the Financial Aid Office and determine in advance whether a cost would be approved prior to incurring that cost.

Below are the allowable expenses for which an increase to the Financial Aid Cost of Attendance may be appealed:

Commuting Expenses

Students who are required to commute a significant distance for enrolled classes, related non-classwork, required experiential learning site, or internships can submit a request to the Financial Aid Office. A student must provide documentation using a recognized mapping website of roundtrip mileage to and from RBC, or similar documentation of such costs. A letter from the student's advisor or supervisor is required with dates of travel and location if the request is related to non-classwork, required experiential learning site, or an internship. Purchase of a vehicle, auto loan payments, insurance, license, registration, and general car maintenance cannot and will not be considered.

Computer Expenses

Federal regulations permit the Financial Aid Office to consider the cost to purchase a computer when calculating a student's COA. Allowable expenses include the purchase cost of a computer, printer, and other necessary software and supplies if the expenses are incurred no earlier than 100 days prior to the beginning of the academic year. A maximum of \$2500 in computer expenses will be considered once per degree level. For example, a freshman may receive assistance of \$1300 for computer expenses and then request \$1200 as a sophomore.

Dependent Care Expenses

In calculating a student's COA, federal regulations permit the Financial Aid Office to include an allowance based on expenses incurred for dependent care. The period for which the dependent care expenses are incurred must be directly related to the time needed for the student to pursue their education. The dependent must have been included in the student's number in household on the Free Application for Federal Student Aid (FAFSA).

Disability-Related Expenses

Students with disability-related expenses may contact the Financial Aid Office to have such expenses considered. Disability-related expenses include but are not limited to personal assistance, equipment, and supplies. The Financial Aid Office may potentially include disability expenses in the COA that are not provided by other assisting agencies. The Financial Aid Office may consult with the RBC Disability Resource Center and/or other sources to confirm the average cost of such expenses. Documentation of actual expenses may be necessary.

Health Insurance

The Financial Aid Office can consider and increase a student's COA if the student is required to pay for their own individual health insurance cost. Documentation of the actual cost incurred **by the student** is required. If a student is on a spouse's or parent's health insurance policy, we cannot take into consideration those costs because these costs are not paid directly by the student.

Housing Costs

Students residing on-campus may have the housing component of their Cost of Attendance adjusted to reflect actual charges.

Students residing off-campus who incur *reasonable* housing costs more than our estimates may be able to request a possible adjustment in the housing component of their COA.

Medical Expenses

The Financial Aid Office generally does not consider COA increases for medical expenses as there is already an allowance for them built into the standard cost. Typically, medical expenses are part of the need-analysis calculation on the FAFSA. In the event a student has an extenuating circumstance related to medical expenses, the student should contact the Office of Student Financial Aid to determine if the costs can be considered and what documentation is required. The Financial Aid Office will not increase the COA for co-pays, deductibles, or any portion of an elective procedure.

One-time Professional Licensing or Certification

The Financial Aid Office may also include the one-time cost of obtaining the first professional credential in a field that requires licensure or certification. This cost must be incurred during a period of enrollment even if the exam is scheduled to be taken after the semester has ended.

The cost of test preparation courses *cannot* be included in a student's COA.

Study Abroad

Federal regulations allow the Financial Aid Office to take into consideration eligible study abroad costs for approved courses of study when determining financial aid eligibility. Charges that exceed the existing estimated budget will be considered.

Other Costs

Students who incur education related expenses not listed above should contact the Financial Aid Office directly for additional information.

Example items NOT eligible for COA increases:

- Auto purchase or payments
- Auto repairs and routine maintenance
- Uber, Lyft, taxicab or rideshare services to and from campus
- Credit card or other consumer debt payments
- Moving expenses and security deposits

- Costs incurred outside of the current academic year
- Costs incurred by a family member or other person, including a spouse or roommate's portion of rent, mortgage, or day care
- Child support and other such childcare expenses (other than daycare)
- Legal fees, bail, traffic tickets, parking tickets, or fines
- Veterinary costs, unless for a service animal
- Sorority or fraternity dues

Students may submit a Cost of Attendance Adjustment Request to the Financial Aid Office by:

- Contacting the Office directly at (804) 862-6260 to initiate an appeal. Please allow between 7 to 10 business days for this appeal to be reviewed.