Findings from PJ Survey
May 2021

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KEY FINDINGS

The May 2021 survey results show that schools continue to see increases in professional judgment (PJ) requests, with 56% of respondents reporting an increase in requests over the same time frame of the previous calendar year, 27% reporting about the same number of PJ requests for the same time frame over the two years, and only 6% reporting a decrease in the number of requests from the prior year. These figures are nearly identical (within 3%) to the responses received in NASFAA's September 2020 survey, suggesting that the COVID-19 pandemic continues to impact families' ability to pay for college.

Financial aid administrators continue to anticipate increases in PJ requests into the 2021-22 award year, with 64% expecting increases as compared to the 2020-21 award year.

Financial aid administrators indicated that they are doing more to publicize the availability of PJ. Thirty-nine percent of financial aid administrators reported that they have begun reaching out proactively to students to inform them about the PJ process, up from 23% and 22% in the September and June 2020 surveys, respectively. In addition to outreach, more financial aid offices (35%) are considering adding PJ resources to institutional webpages outside of the financial aid office, up from just over 20% in the June and September 2020 surveys.

Related, we observed a steady increase over the course of the three surveys in the number of respondents who report that they have begun training non-financial aid staff to recognize when they should refer a student to the financial aid office for PJ, with 17% of May 2021 responding institutions doing this now, compared with 12% of September 2020 responding institutions and 7% of June 2020 responding institutions.

There are indications that institutions are making use of Department of Education (ED) PJ guidance issued in January 2021 regarding institutions' ability to use documentation of unemployment to reduce or adjust the income earned from work and adjusted gross income (AGI) figures in the Federal Methodology (FM) formula. Sixty-nine percent of respondents reported doing this or considering doing this since the COVID-19 pandemic emerged vs. 43% in the September 2020 survey, before the guidance was issued. Additionally, 64% of respondents — versus 40% in September — indicated that they began to exclude or are considering excluding unemployment benefits from total income in the FM formula if the applicant provides documentation of receipt of unemployment benefits.

This aligns with results from our September 2020 survey, in which 80% of respondents said their office would zero out earnings and/or unemployment benefits for family members who lost jobs during the pandemic if Congress and/or ED explicitly permitted it, as they did with the 2009 GEN-09-05 guidance in the wake of the Great Recession.

Below are the results from NASFAA's May 2021 survey. The appendix contains corresponding results from the June 2020 and September 2020 surveys where applicable.

METHODOLOGY

On May 10, 2021, NASFAA distributed a survey to 2,653 primary contacts at our member institutions. The survey closed on Wednesday, May 19, 2021 at 5:00 p.m. ET. There were 224 surveys submitted, resulting in a 9% response rate. Below are the aggregate level results.

On May 26, 2020, NASFAA distributed a survey to 2,613 primary contacts at our member institutions. The survey closed on Friday, June 5, 2020 at 5:00 p.m. ET. There were 293 surveys submitted, resulting in an 11% response rate. Below are the aggregate level results.

On September 21, 2020, NASFAA distributed a survey to 2,524 primary contacts at our member institutions. The survey closed on Friday, October 2, 2020 at 5:00 p.m. ET. There were 212 surveys submitted, resulting in an 8% response rate. Below are the aggregate level results.

OVERALL RESULTS FROM MAY 2021 SURVEY

What is the total number of PJ requests your office has received since March 1, 2020?

Minimum	Maximum	Mean	n
0	5636	275	154

How does that number compare to the total number of PJ requests your office received between March 1, 2019 - May 10, 2020?

Greatly increased (increase of 50% or more)	21%
Somewhat increased (0 - 49% increase)	35%
About the same	27%
Somewhat decreased (0 - 49% decrease)	6%
Greatly decreased (decrease of 50% or more)	0%
We do not track this data	10%
n	220

How does the number of PJ requests your office has received since March 1, 2020 compare to the number of PJ requests your office anticipated receiving?

Significantly higher (> 50% higher than anticipated)	7%
Somewhat higher (0-49% higher than anticipated)	15%
About the same as anticipated	42%
Somewhat decreased (0-49% lower than anticipated)	20%
Greatly decreased (> 50% lower than anticipated)	6%
We do not track this data	9%
n	220

Do you anticipate an increase to the total number of PJ requests your office will receive for the 2021-22 award year, as compared to the 2020-21 award year?

Anticipate PJ requests will greatly increase (increase of 50% or more)	18%
Anticipate PJ requests will increase somewhat (0 - 49% increase)	46%
Anticipate about the same number of PJ requests	29%
Anticipate PJ requests will decrease somewhat (0 - 49% decrease)	1%
Anticipate PJ requests will greatly decrease (decrease of 50% or more)	0%
We do not track this data	5%
n	220

What actions is your financial aid office or institution taking to manage this increase (if you are already experiencing an increase in PJ requests) or to prepare for this increase (if you are not already experiencing an increase in PJ requests but anticipate that you might experience an increase in the future)?

	My office was doing this before COVID-19	My office began doing this after COVID-19 emerged	My office is considering doing this	My office does not do this and is not considering doing this	n
Reaching out to students proactively to inform them about the PJ process	20%	39%	30%	11%	210
Using a standardized form for students to submit PJ requests	81%	8%	6%	5%	213
Training financial aid staff on PJ	80%	8%	10%	2%	211
Providing students with time frames in which to expect their PJ requests to be completed	80%	5%	8%	7%	213
Updating consumer information (website, etc.) with information about your institution's PJ policies and procedures	55%	13%	21%	10%	210
Cross-linking PJ resources on financial aid webpage to other campus offices' webpages	15%	14%	35%	35%	210
Training non-financial aid staff to recognize when to refer students to financial aid office for a PJ request	43%	17%	25%	15%	210

What actions is your financial aid office or institution taking to manage this increase (if you are already experiencing an increase in PJ requests) or to prepare for this increase (if you are not already experiencing an increase in PJ requests but anticipate that you might experience an increase in the future)?

	My office began doing this after COVID-19 emerged	My office is considering doing this	My office does not do this and is not considering doing this	n
Increasing frequency of meetings of your financial aid appeal committee	37%	15%	48%	200
Altering student documentation requirements	30%	19%	51%	199
Altering staff review policies and procedures	30%	23%	47%	199
Awarding emergency funding proactively as an attempt to reduce the number of PJ requests	32%	20%	48%	202
Offering refunds for expenses already paid to reduce the number of PJ requests	12%	7%	81%	198
Offering discounts on future tuition, room, board, or books to reduce the number of PJ requests	8%	4%	88%	201
Expanding the types of circumstances that you will consider for PJ (for instance, using estimated income instead of base income for the EFC calculation or permitting private elementary and secondary school costs in the COA)	37%	20%	44%	200
Using estimated income of zero in place of base year income in the EFC calculation for a family member based on documentation of receipt of unemployment benefits	38%	31%	31%	201
Not including unemployment benefits as part of estimated income for a family member based on documentation of receipt of unemployment benefits	32%	33%	35%	201

What is your institution doing to ensure equitable and unbiased PJ decisions are made?

	My office was doing this before COVID-19	My office began doing this after COVID-19 emerged	My office is considering doing this	My office does not do this and is not considering doing this	n
Providing staff training on implicit/unconscious bias as it applies to PJ decisions	55%	6%	22%	18%	199
Requiring PJ decisions to be made by committee vs. individuals	34%	4%	13%	48%	201
Masking student identifiers like name, race/ethnicity, gender identity, etc. during PJ request consideration	18%	1%	12%	69%	198
Reviewing PJ policies for potential bias (for instance, allowing some expenses to increase COA but not others, and how that might disproportionately impact certain students)	27%	5%	28%	41%	196

Which, if any, of the following conditions does your office require to be met before it will consider a PJ request and when did you begin requiring or considering requiring this?

	My office was doing this before COVID-19	My office began doing this after COVID-19 emerged	My office is considering doing this	My office was doing this before COVID-19 and is no longer doing this	My office does not do this and is not considering doing this	n
Minimum length of unemployment duration before PJ request is considered	31%	3%	12%	12%	42%	195
Minimum dollar amount or percentage of family income lost due to unemployment before PJ request is considered	18%	3%	9%	3%	67%	194
Uninsured medical expenses must meet a minimum dollar amount or percentage of family income, or must exceed the percentage of the IPA that is established for medical expenses before PJ request is considered	58%	2%	9%	3%	28%	191
Other standard(s) or minimum(s) must be met before PJ request is considered (excluding statutory/regulatory requirements)	34%	2%	7%	3%	54%	192

Above you indicated your office began using or is considering using estimated income of zero in place of base year income in the EFC calculation for a family member based on documentation of receipt of unemployment benefits after COVID-19 emerged. Please indicate which of the following about your office is correct:

My office was considering this before ED issued DCL GEN-21-02 and is still considering doing this, but has not yet done so	15%
My office was not considering this before ED issued DCL GEN-21-02 but is now considering doing this as a result of DCL GEN-21-02	29%
My office has begun to do this since ED issued DCL GEN-21-02	38%
My office was doing this before ED issued DCL GEN-21-02	18%
n	130

Is your office considering diversifying representation on the PJ committee (e.g., ensuring individuals from marginalized groups and/or a multitude of campus offices are represented)?

Yes	39%
No	61%
n	97

How is your office complying with or planning to comply with the requirement in the American Rescue Plan to spend a portion of Higher Education Emergency Relief Fund III (HEERF III) funds to conduct direct outreach to financial aid applicants about their opportunity to request PJ for special circumstances like unemployment? (Check all that apply.)

Postal mail notices to students	17%
Email notices to students	67%
Direct communication with students via institutional student portal	35%
Text messages to students	18%
Other direct communication with students - please describe (open-ended text)	6%
Unsure; waiting for ED guidance before we decide how we will conduct direct outreach	39%
Unsure of how we will communicate with students (for reasons other than waiting for ED guidance)	20%
n	189

How much is your office spending (or do you anticipate spending) to comply with the requirement in the American Rescue Plan to spend a portion of HEERF III funds to conduct direct outreach to financial aid applicants about their opportunity to request PJ for special circumstances like unemployment?

< 1% of our allocation	23%
Between 1% and 4.99% of our allocation	5%
Between 5% and 10% of our allocation	1%
More than 10% of our allocation	3%
Unsure; waiting for ED guidance before we decide how we will comply and how much we will spend on compliance with this requirement	38%
Unsure how much my office is spending/will spend (for reasons other than waiting for ED guidance)	30%
n	189

What resources would be most helpful to you and your staff in preparing for an increase in PJ requests? (Check all that apply.)

On-demand training workshops/webinars	62%
Facilitated discussion with other financial aid administrators	48%
Downloadable/printable training materials	68%
List of best practices for PJ requests	84%
Sample PJ forms	65%
Legislative/regulatory relief	53%
n	189

APPENDIX: RESULTS FROM JUNE 2020, SEPTEMBER 2020, AND MAY 2021 SURVEYS

Survey Question: What is the total number of PJ requests your office has received since March 1, 2020?

Survey	Minimum	Maximum	Mean	n
June 2020	0	847	65	221
September 2020	0	5,419	152	165
May 2021	0	5,636	275	154

Survey Question:
- June 2020: How does that number compare to the total number of PJ requests your office received between March 1, 2019 - May 26, 2019?
- September 2020: How does that number compare to the total number of PJ requests your office received between March 1, 2019 - September 21, 2019?
- May 2021: How does that number compare to the total number of PJ requests your office received between March 1, 2019 - May 10, 2020?

	June '20	Sept. '20	May '21
Greatly increased (increase of 50% or more)	21%	29%	21%
Somewhat increased (0 - 49% increase)	26%	30%	35%
About the same	32%	27%	27%
Somewhat decreased (0 - 49% decrease)	5%	8%	6%
Greatly decreased (decrease of 50% or more)	2%	1%	0%
We do not track this data	14%	5%	10%
n	287	212	220

Survey Question: How does the number of PJ requests your office has received since March 1, 2020 compare to the number of PJ requests your office anticipated receiving?[1]

	Sept. '20	May '21
Significantly higher (> 50% higher than anticipated)	11%	7%
Somewhat higher (0-49% higher than anticipated)	18%	15%
About the same as anticipated	35%	42%
Somewhat decreased (0-49% lower than anticipated)	21%	20%
Greatly decreased (> 50% lower than anticipated)	8%	6%
We do not track this data	7%	9%
n	209	220

Survey Question:
- June 2020: Do you anticipate an increase to the total number of PJ requests your office will receive between May 26, 2020 - October 1, 2020 as compared to the same date range last year?
- September 2020: Do you anticipate an increase to the total number of PJ requests your office will receive between October 1, 2020 - December 31, 2020 as compared to the same date range last year?
- May 2021: Do you anticipate an increase to the total number of PJ requests your office will receive for the 2021-22 award year as compared to the 2020-21 award year?

	June '20	Sept. '20	May '21
Anticipate PJ requests will greatly increase (increase of 50% or more)	42%	16%	18%
Anticipate PJ requests will increase somewhat (0 - 49% increase)	48%	42%	46%
Anticipate about the same number of PJ requests	6%	36%	29%
Anticipate PJ requests will decrease somewhat (0 - 49% decrease)	0%	2%	1%
Anticipate PJ requests will greatly decrease (decrease of 50% or more)	0%	1%	0%
We do not track this data	4%	3%	5%
n	293	211	220

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[1] This question was not included in the June 2020 survey.

Survey Question: What actions is your financial aid office or institution taking to manage this increase (if you are already experiencing an increase in PJ requests); or to prepare for this increase (if you are not already experiencing an increase in PJ requests but anticipate that you might experience an increase in the future)?

	My office was doing this before COVID-19			My office began doing this after COVID-19 emerged			My office is considering doing this			My office does not do this and is not considering doing this			n		
	June 2020	September 2020	May 2021	June 2020	September 2020	May 2021	June 2020	September 2020	May 2021	June 2020	September 2020	May 2021	June 2020	September 2020	May 2021
Reaching out to students proactively to inform them about the PJ process	21%	23%	20%	22%	23%	39%	28%	15%	30%	29%	38%	11%	278	211	210
Using a standardized form for students to submit PJ requests	84%	83%	81%	2%	5%	8%	9%	5%	6%	6%	7%	5%	288	210	213
Training financial aid staff on PJ	76%	74%	80%	4%	7%	8%	15%	8%	10%	5%	10%	2%	282	211	211
Providing students with time frames in which to expect their PJ requests to be completed	73%	77%	80%	4%	5%	5%	12%	7%	8%	12%	11%	7%	281	209	213
Updating consumer information (website, etc.) with	47%	49%	55%	9%	9%	13%	27%	21%	21%	17%	21%	10%	276	209	210

information about your institution's PJ policies and procedures														
Cross-linking PJ resources on financial aid webpage to other campus offices' webpages	15%	19%	15%	5%	9%	14%	23%	21%	35%	57%	51%	35%	276	209	210
Training non-financial aid staff to recognize when to refer students to financial aid office for a PJ request	53%	43%	43%	7%	12%	17%	20%	17%	25%	21%	28%	15%	278	210	210

Survey Question: What actions is your financial aid office or institution taking to manage this increase (if you are already experiencing an increase in PJ requests); or to prepare for this increase (if you are not already experiencing an increase in PJ requests but anticipate that you might experience an increase in the future)?[2]

	My office began doing this after COVID-19 emerged			My office is considering doing this			My office does not do this and is not considering doing this			n		
	June 2020	September 2020	May 2021	June 2020	September 2020	May 2021	June 2020	September 2020	May 2021	June 2020	September 2020	May 2021
Increasing frequency of meetings of your financial aid appeal committee	26%	26%	37%	27%	10%	15%	47%	65%	48%	272	206	200
Altering student documentation requirements	23%	29%	30%	32%	12%	19%	45%	60%	51%	275	207	199
Altering staff review policies and procedures	25%	27%	30%	37%	13%	23%	38%	60%	47%	271	207	199
Awarding emergency funding proactively as an attempt to reduce the number of PJ requests	35%	32%	32%	21%	15%	20%	44%	53%	48%	273	206	202
Offering refunds for expenses already paid to reduce the number of PJ requests	27%	12%	12%	10%	5%	7%	63%	84%	81%	271	208	198
Offering discounts on future tuition, room, board, or books to reduce the number of PJ requests	9%	6%	8%	12%	5%	4%	78%	89%	88%	268	208	201
Expanding the types of circumstances that you will consider for PJ (for instance, using estimated income instead of base income for the EFC calculation or permitting private elementary and secondary school costs in the COA)	N/A	36%	37%	N/A	17%	20%	N/A	47%	44%	N/A	207	200
Using estimated income of zero in place of base year income in the EFC calculation for a family member based on documentation of receipt of unemployment benefits	N/A	23%	38%	N/A	20%	31%	N/A	57%	31%	N/A	204	201
Not including unemployment benefits as part of estimated income for a family member based on documentation of receipt of unemployment benefits	N/A	17%	32%	N/A	23%	33%	N/A	61%	35%	N/A	203	201

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[2] The September 2020 Survey added choices to the question that were not included in the June 2020 survey. These new answers are marked with "N/A" on the June 2020 column.

Survey Question: What is your institution doing to ensure equitable and unbiased PJ decisions are made?[3]

	My office was doing this before COVID-19		My office began doing this after COVID-19 emerged		My office is considering doing this		My office does not do this and is not considering doing this		n	
	September 2020	May 2021	September 2020	May 2021	September 2020	May 2021	September 2020	May 2021	September 2020	May 2021
Providing staff training on implicit/unconscious bias as it applies to PJ decisions	68%	55%	4%	6%	11%	22%	17%	18%	210	199
Requiring PJ decisions to be made by committee vs. individuals	33%	34%	5%	4%	11%	13%	52%	48%	209	201
Masking student identifiers like name, race/ethnicity, gender identity, etc. during PJ request consideration	19%	18%	0%	1%	10%	12%	71%	69%	209	198
Reviewing PJ policies for potential bias (for instance, allowing some expenses to increase COA but not others, and how that might disproportionately impact certain students)	34%	27%	3%	5%	20%	28%	42%	41%	209	196

[3] This question was not included in the June 2020 survey.

Survey Question:
- June 2020 Question: Not on survey
- September 2020 Question: Does your office require any of the following conditions to be met before it will consider a PJ request?
- May 2021: Which, if any, of the following conditions does your office require to be met before it will consider a PJ request and when did you begin requiring or considering requiring this?

	My office was doing this before COVID-19		My office began doing this after COVID-19 emerged		My office is considering doing this		My office was doing this before COVID-19 and is no longer doing this		My office does not do this and is not considering doing this		n	
	September 2020	May 2021	September 2020	May 2021	September 2020	May 2021	September 2020	May 2021	September 2020	May 2021	September 2020	May 2021
Minimum length of unemployment duration before PJ request is considered	30%	31%	3%	3%	4%	12%	11%	12%	52%	42%	209	195
Minimum dollar amount or percentage of family income lost due to unemployment before PJ request is considered	21%	18%	2%	3%	5%	9%	3%	3%	69%	67%	210	194
Uninsured medical expenses must meet a minimum dollar amount or percentage of family income, or must exceed the percentage of the IPA that is established for medical expenses before PJ request is considered	53%	58%	1%	2%	6%	9%	3%	3%	36%	28%	209	191
Other standard(s) or minimum(s) must be met before PJ request is considered (excluding statutory/regulatory requirements)	31%	34%	1%	2%	5%	7%	1%	3%	62%	54%	209	192

Survey Question: Is your office considering diversifying representation on the PJ committee (e.g. ensuring individuals from marginalized groups and/or a multitude of campus offices are represented)?[4]

	9.2020	5.2021
Yes	34%	39%
No	66%	61%
n	99	97

Survey Question: What resources would be most helpful to you and your staff in preparing for an increase in PJ requests? (Check all that apply.)

	5.2020	9.2020	5.2021
On-demand training workshops/webinars	74%	53%	62%
Facilitated discussion with other financial aid administrators	53%	43%	48%
Downloadable/printable training materials	77%	62%	68%
List of best practices for PJ requests	85%	85%	84%
Sample PJ forms	69%	65%	65%
Legislative/regulatory relief	73%	67%	53%
n	284	207	189

[4] 4 This question was not included in the June 2020 survey.