Findings from Survey on Professional Judgment NASFAA

May 2022

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KEY FINDINGS

The May 2022 survey results show that financial aid administrators are doing more to publicize the availability of PJ. Fifty-five percent of financial aid administrators reported that, since the pandemic started, they have begun reaching out proactively to students to inform them about the PJ process, up from 39% in the previous year's survey. This may be attributable in part to the requirement in the American Rescue Plan, enacted in March 2021, for institutions to use a portion of their Higher Education Emergency Relief (HEERF) institutional share funds on outreach about the availability of PJ.

Institutions primarily communicated direct outreach about the opportunity to request PJ, as required in the American Rescue Plan, by email (79%) with respondents also indicating that they used postal mail (36%) and their institutional portal (34%) to conduct this outreach. Most institutions (51%) used less than 1% of their HEERF III institutional share dollars to conduct this outreach.

Separate, but related, twenty-six percent of respondents indicated that they have conducted or have plans to conduct targeted PJ outreach to financial aid applicants about the potential for higher EFCs in the 2022-23 award year as a result of changes to the tax treatment of unemployment benefits included in the American Rescue Plan. Thirty-five percent had no plans to conduct such outreach and 45% were unsure.

Below are the results from NASFAA's May 2022 survey. The appendix contains corresponding results from the June 2020, September 2020, and May 2021 surveys, where applicable.

METHODOLOGY

On May 23, 2022, NASFAA distributed a survey to 2,677 primary contacts at our member institutions. The survey closed on Friday, June 3, 2022, at 5:00 p.m. ET. There were 166 surveys submitted, resulting in a 6% response rate. Below are the aggregate level results.

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 2022 SURVEY

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

Minimum	Maximum	Mean	n
0	7,288	443	129

What is the total number of PJ requests your office has received between May 10, 2021 through today?

Minimum	Maximum	Mean	n
0	3247	205	128

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)	19%
Somewhat increased (0 - 49% increase)	26%
About the same	26%
Somewhat decreased (0 - 49% decrease)	14%
Greatly decreased (decrease of 50% or more)	4%
We do not track this data	12%
n	168

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	47%
Somewhat decreased (0-49% lower than anticipated)	11%
Greatly decreased (> 50% lower than anticipated)	4%
We do not track this data	15%
n	169

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)	5%
Anticipate PJ requests will increase somewhat (0 - 49% increase)	28%
Anticipate about the same number of PJ requests	42%
Anticipate PJ requests will decrease somewhat (0 - 49% decrease)	12%
Anticipate PJ requests will greatly decrease (decrease of 50% or more)	2%
We do not track this data	11%
n	169

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	29%	55%	7%	9%	161
Using a standardized form for students to submit PJ requests	85%	6%	4%	6%	161
Training financial aid staff on PJ	85%	6%	4%	4%	158
Providing students with time frames in which to expect their PJ requests to be completed	74%	11%	6%	9%	159
Updating consumer information (website, etc.) with information about your institution's PJ policies and procedures	56%	12%	19%	13%	160
Cross-linking PJ resources on financial aid webpage to other campus offices' webpages	15%	15%	28%	42%	161
Training non-financial aid staff to recognize when to refer students to financial aid office for a PJ request	47%	9%	19%	25%	161

What actions are 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	33%	14%	53%	156
Altering student documentation requirements	27%	13%	60%	157
Altering staff review policies and procedures	32%	12%	56%	156
Awarding emergency funding proactively as an attempt to reduce the number of PJ requests	32%	10%	59%	157
Offering refunds for expenses already paid to reduce the number of PJ requests	9%	6%	85%	155
Offering discounts on future tuition, room, board, or books to reduce the number of PJ requests	5%	3%	92%	158
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)	35%	23%	42%	155
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	48%	18%	34%	157
Not including unemployment benefits as part of estimated income for a family member based on documentation of receipt of unemployment benefits	49%	21%	30%	154

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	60%	9%	16%	15%	155
Requiring PJ decisions to be made by committee vs. individuals	35%	3%	14%	48%	155
Masking student identifiers like name, race/ethnicity, gender identity, etc. during PJ request consideration	17%	2%	17%	65%	156
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)	32%	5%	31%	32%	155

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 does not do this and is not considering doing this	My office was doing this before COVID-19 and is no longer doing this	n
Minimum length of unemployment duration before PJ request is considered	34%	7%	5%	42%	12%	155
Minimum dollar amount or percentage of family income lost due to unemployment before PJ request is considered	20%	5%	4%	60%	11%	156
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	63%	3%	6%	24%	4%	156
Other standard(s) or minimum(s) must be met before PJ request is considered (excluding statutory/regulatory requirements)	38%	2%	6%	48%	6%	154

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 or was considering doing so. 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	6%
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	16%
My office has begun to do this since ED issued DCL GEN-21-02	55%
My office was doing this before ED issued DCL GEN-21-02	23%
n	97

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	75

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 Funds 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	36%
Email notices to students	79%
Direct communication with students via institutional student portal	34%
Text messages to students	19%
Other direct communication with students- please describe	21%
Unsure of how we will communicate with students	6%
n	149

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	51%
Between 1% and 4.99% of our allocation	10%
Between 5% and 10% of our allocation	2%
More than 10% of our allocation	1%
Unsure how much my office is spending/will spend	36%
n	146

Is your office conducting any targeted PJ outreach based on ED's Electronic Announcement related to the potential for higher EFCs in the 2022-23 award year as a result of changes to the tax treatment of unemployment benefits included in the American Rescue Plan?

Yes, we are conducting outreach or have plans to conduct outreach to aid applicants about this issue	26%
No, we are not conducting outreach and have no plans to conduct outreach to aid applicants about this issue	35%
Unsure/don't know	45%
n	151

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	55%
Facilitated discussion with other financial aid administrators	43%
Downloadable/printable training materials	65%
List of best practices for PJ requests	84%
Sample PJ forms	62%
Legislative/regulatory relief	46%
n	146

How does ED's recent extension of previous guidance indicating that they will not negatively view increased use of professional judgment or use it as a selection criterion for a program compliance review for the 2022-23 award year affect your institution's willingness to use PJ?

My institution is more willing to use PJ in light of ED's recent guidance	13%
My institution is as likely as it was before ED's recent guidance to use PJ	83%
My institution is less likely to use PJ in light of ED's recent guidance	1%
Don't know	3%
n	150

APPENDIX: RESULTS FROM JUNE 2020, SEPTEMBER 2020, MAY 2021 AND MAY 2022 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
May 2022	0	7,288	443	129

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.
- May 2022: How does that number compare to the total number of PJ requests your office received between March 1, 2019 - May 10, 2020[1].

	6.2020	9.2020	5.2021	5.2022
Greatly increased (increase of 50% or more)	21%	29%	21%	19%
Somewhat increased (0 - 49% increase)	26%	30%	35%	26%
About the same	32%	27%	27%	26%
Somewhat decreased (0 - 49% decrease)	5%	8%	6%	14%
Greatly decreased (decrease of 50% or more)	2%	1%	0%	4%
We do not track this data	14%	5%	10%	12%
n	287	212	220	168

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[1] This survey question was inaccurately updated and should have read "…for the 2022-23 award year as compared to the 2021-22 award year?"

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?[2]

	9.2020	5.2021	5.2022
Significantly higher (> 50% higher than anticipated)	11%	7%	7%
Somewhat higher (0-49% higher than anticipated)	18%	15%	15%
About the same as anticipated	35%	42%	47%
Somewhat decreased (0-49% lower than anticipated)	21%	20%	11%
Greatly decreased (> 50% lower than anticipated)	8%	6%	4%
We do not track this data	7%	9%	15%
n	209	220	169

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 - 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?
- May 2022: 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?[3]

	6.2020	9.2020	5.2021	5.2022
Anticipate PJ requests will greatly increase (increase of 50% or more)	42%	16%	18%	5%
Anticipate PJ requests will increase somewhat (0 - 49% increase)	48%	42%	46%	28%
Anticipate about the same number of PJ requests	6%	36%	29%	42%
Anticipate PJ requests will decrease somewhat (0 - 49% decrease)	0%	2%	1%	12%
Anticipate PJ requests will greatly decrease (decrease of 50% or more)	0%	1%	0%	2%
We do not track this data	4%	3%	5%	11%
n	293	211	220	169

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

[3] This survey question was inaccurately updated and should have read "…for the 2022-23 award year as compared to the 2021-22 award year?"

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	May 2022	June 2020	May 2022	June 2020	May 2022	June 2020	May 2022	June 2020	May 2022
Reaching out to students proactively to inform them about the PJ process	21%	29%	22%	55%	28%	7%	29%	9%	278	161
Using a standardized form for students to submit PJ requests	84%	85%	2%	6%	9%	4%	6%	6%	288	161
Training financial aid staff on PJ	76%	85%	4%	6%	15%	4%	5%	4%	282	158
Providing students with time frames in which to expect their PJ requests to be completed	73%	74%	4%	11%	12%	6%	12%	9%	281	159
Updating consumer information (website, etc.) with information about your institution's PJ policies and procedures	47%	56%	9%	12%	27%	19%	17%	13%	276	160
Cross-linking PJ resources on financial aid webpage to other campus offices' webpages	15%	15%	5%	15%	23%	28%	57%	42%	276	161
Training non-financial aid staff to recognize when to refer students to financial aid office for a PJ request	53%	47%	7%	9%	20%	19%	21%	25%	278	161

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)?[4]

	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	May 2022	June 2020	May 2022	June 2020	May 2022	June 2020	May 2022
Increasing frequency of meetings of your financial aid appeal committee	26%	33%	27%	14%	47%	53%	272	156
Altering student documentation requirements	23%	27%	32%	13%	45%	60%	275	157
Altering staff review policies and procedures	25%	32%	37%	12%	38%	56%	271	156
Awarding emergency funding proactively as an attempt to reduce the number of PJ requests	35%	32%	21%	10%	44%	59%	273	157
Offering refunds for expenses already paid to reduce the number of PJ requests	27%	9%	10%	6%	63%	85%	271	155
Offering discounts on future tuition, room, board, or books to reduce the number of PJ requests	9%	5%	12%	3%	78%	92%	268	158
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	35%	N/A	23%	N/A	42%	N/A	155
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	48%	N/A	18%	N/A	34%	N/A	157
Not including unemployment benefits as part of estimated income for a family member based on documentation of receipt of unemployment benefits	N/A	49%	N/A	21%	N/A	30%	N/A	154

[4] 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?

	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 2022	September 2020	May 2022	September 2020	May 2022	September 2020	May 2022	September 2020	May 2022
Providing staff training on implicit/unconscious bias as it applies to PJ decisions	68%	60%	4%	9%	11%	16%	17%	15%	210	155
Requiring PJ decisions to be made by committee vs. individuals	33%	35%	5%	3%	11%	14%	52%	48%	209	155
Masking student identifiers like name, race/ethnicity, gender identity, etc. during PJ request consideration	19%	17%	0%	2%	10%	17%	71%	65%	209	156
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%	32%	3%	5%	20%	31%	42%	32%	209	155

Survey Question:
- September 2020 Question: Does your office require any of the following conditions to be met before it will consider a PJ request?
- May 2022: 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 2022	September 2020	May 2022	September 2020	May 2022	September 2020	May 2022	September 2020	May 2022	September 2020	May 2022
Minimum length of unemployment duration before PJ request is considered	30%	34%	3%	7%	4%	5%	11%	12%	52%	42%	209	155
Minimum dollar amount or percentage of family income lost due to unemployment before PJ request is considered	21%	20%	2%	5%	5%	4%	3%	11%	69%	60%	210	156
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%	63%	1%	3%	6%	6%	3%	4%	36%	24%	209	156
Other standard(s) or minimum(s) must be met before PJ request is considered (excluding statutory/regulatory requirements)	31%	38%	1%	2%	5%	6%	1%	6%	62%	48%	209	154

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)?[5]

	9.2020	5.2021	5.2022
Yes	34%	39%	39%
No	66%	61%	61%
n	99	97	75

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	5.2022
On-demand training workshops/webinars	74%	53%	62%	36%
Facilitated discussion with other financial aid administrators	53%	43%	48%	79%
Downloadable/printable training materials	77%	62%	68%	34%
List of best practices for PJ requests	85%	85%	84%	19%
Sample PJ forms	69%	65%	65%	21%
Legislative/regulatory relief	73%	67%	53%	6%
n	284	207	189	149

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