

Prepping for Prior-Prior Year: A Guide to Principles and Practices August 2016

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Fulfilling the Promise of an Earlier FAFSA

As leaders, practitioners, and facilitators of access and affordability, your campus roles are critical to students and their success. The earlier timeline of the FAFSA using prior-prior year (PPY) income information is a major landscape change that brings the potential for greater benefits to students and families and provides a unique opportunity for institutions to reevaluate goals, objectives, and ethical principles guiding student enrollment functions.

Sharing collective knowledge and practices through this second in a series of College Board guides is an example of how we highlight member voices and the good work of our community in addressing this shift. With thoughtful planning, collaboration, and conversation, together we can fulfill the promise of an earlier FAFSA and continue to support students on their higher education pathway.

To develop this guide and related resources, the College Board worked in close collaboration with the American Association of Collegiate Registrars and Admissions Officers (AACRAO), the National Association for College Admission Counseling (NACAC), the National Association of Student Financial Aid Administrators (NASFAA), the National College Access Network (NCAN), and others. Individually and collectively, these organizations are committed to providing clear, consistent guidance to higher education professionals, school counselors, and college access advisers as they prepare for 2017-18 admission and financial aid processes, and convey important information to students and families.

Prepping for Prior-Prior Year: A Guide to Principles and Practices reflects discussions among College Board national council leaders representing counseling, admission, and financial aid professionals who devoted significant time to exploring the role of ethical standards in making decisions related to admission and financial aid. It draws heavily on previous and current work of NACAC as the association continues to engage a wide cross section of members and other educational leaders in discussion of the association and admission counseling ethical standards within the context of the changing educational landscape. The establishment of NACAC's new [Steering Committee on Admission Practices](#) could not have come at a better time given the advent of "prior-prior year" and changes to campus policies and practices that may transpire in response.

The College Board will continue to provide resources and discussion opportunities through summer 2017. Watch for updates, information, and tools at collegeboard.org/ppyresources. As you make the changes required to respond to PPY on your campus, please share your experiences, questions, and best practices by emailing the College Board at preppingforppy@collegeboard.org.

Using This Guide

Prepping for Prior-Prior Year: A Guide to Principles and Practices is divided into two major sections. The first focuses on providing a decision-making framework; the second provides practical hands-on guidance for enrollment, admission, and financial aid professionals who are facing decisions related to the 2017-18 FAFSA.

Potential shifts in institutional policies, along with the timing and magnitude of changes associated with PPY, are important considerations that echoed throughout our conversations with practitioners. The community consensus is that decisions be made with care, with transparency, and with the best interests of students in mind. A comprehensive and deliberate plan will help assure these outcomes.

This guide has the following sections:

Part One: Foundations of Ethical Decision Making

This section provides guidance and considerations for professionals who are addressing a range of policy and operational decisions. It includes:

- Four Ethical Approaches
- Five Steps to Making Ethical Decisions

Part Two: Practices and Case Studies

This section includes real-world examples gathered from members of the College Board, NACAC, and NASFAA on topics including:

- Calendar/Award Notification
- Deadlines
- Communications and Outreach
- Special Circumstances and Professional Judgment

PROMISING PRACTICES

Promising practices are real-life examples that may be working for colleagues in the field to effectively address issues of concern and show positive outcomes for students. Implementation tips are quick takeaways or advice from colleagues that may help you think through PPY issues on your campus.

✔ Promising Practices, ✎ Implementation Tips, and ⚙ Resources are denoted with special icons at the left for quick and easy reference.

We recommend using this guide in conjunction with the resources found at collegeboard.org/ppyresources. This website is the best source for the most recent information available from the College Board.

Part One: Foundations of Ethical Decision Making

The central consideration around prior-prior year (PPY) is to prepare for earlier receipt of 2017-18 FAFSAs and for family contributions based on income information from two years prior to the academic year. All institutions will need to consider and make important policy and operational decisions:

- **Calendar decisions** – including when you set application deadlines and your schedule for establishing tuition and other costs of attendance
- **Operational decisions** – including updating your student information system, your student communications, and your processing policies
- **Collaboration decisions** – including taking this opportunity to improve coordination between financial aid and admission processes

Making Ethical Decisions

In making policy decisions that affect students, it's important to address potentially harmful situations and unintended consequences that could result. Decisions should be implemented with the greatest care and attention to the concerns of all who may be affected.

There are multiple documents that can serve as guideposts as you weigh decisions regarding changes for 2017-18. These include:

- *Principles and Practices of Financial Aid Administration* (College Board)
- *Statement of Principles of Good Practice* (NACAC)
- *Statement of Ethical Principles* (NASFAA)

Links to each of these documents are available at the end of this section. They reflect the core values of professional practice, which are essential ingredients to ethical decision making. These values include:

- Acting in the best interest of students
- Transparency and clarity in communication
- Equity and fairness

Four Ethical Approaches

Essential to any decision with ethical implications is the identification and consideration of institutional and departmental missions. This initial focus will assure that the ethical approach taken and the resulting decision to be implemented will align with and support the mission.

Drawing from the values listed in the section above, this guide relies on four well-recognized approaches to ethical decision making:

Utilitarian Approach – Decisions using this approach seek balance by increasing the good done for the greatest number while reducing the harm done and the number of individuals harmed.

Fairness Approach – Decisions made using this approach strive to treat all individuals as equally or fairly as possible based on a defensible, consistent standard.

Common Good Approach – Decisions using this approach rely on a philosophy of interdependence with respect and compassion for all — especially vulnerable individuals.

Mission Approach – Decisions using this approach prioritize the mission and values of an organization in evaluating and deciding among options.

When weighing policy and operational decisions related to PPY and the transition to an earlier FAFSA calendar, most institutions will likely use more than one approach, depending on their campus cultures and values.

Five Steps to Making Ethical Decisions

Each of the four ethical approaches can help determine which standards of behavior are ethical for a particular circumstance on your campus. Establishing a systematic approach toward evaluating a problem or situation leads to more well-reasoned decisions.

Consider the following steps as you evaluate potential changes to admission and financial aid calendars, policies, and practices:

- 1 Recognize an ethical issue. Does this decision involve a choice between good and bad alternatives and could this situation be damaging to some students or groups of students?
- 2 Get the facts and outline your options. What data and relevant facts can you gather, and will you know enough to be able to make an informed decision? What are your options?
- 3 Evaluate your options in the context of ethical approaches:
 - ▶ Which option will produce the most good and do the least harm? (Utilitarian)
 - ▶ Which option treats students equally or fairly? (Fairness)
 - ▶ Which option best serves all students, not just some? (Common Good)
 - ▶ Which option is the best fit with your institutional mission? (Mission)
- 4 Make a decision, then do a reality check. Choose the option that best addresses the policy or practice in question, then ask yourself, “If my decision were published on the front page of a newspaper, how would I feel and how would others react?” Do you need to revisit your decision?
- 5 Act, and evaluate the outcome. Consider how your decision can be implemented with the greatest care and attention to the concerns of all students and your institution. Create ways to evaluate and measure the “success” of your decision.

Resources

Much of the information above was drawn from “A Framework for Ethical Decision Making,” developed by the Markkula Center for Applied Ethics (www.scu.edu/ethics) at Santa Clara University. Additional guidance was provided by Ann Skeet, director of leadership ethics at the Markkula Center.

Further reading and resources can be found at:

College Board: *Principles and Practices of Financial Aid Administration* (www.collegeboard.com/prod_downloads/prof/principlesandpracticesofFA.pdf)

NACAC: *Statement of Principles of Good Practice* (www.nacacnet.org/spgp)

NASFAA: *Statement of Ethical Principles* (www.nasfaa.org/Statement_of_Ethical_Principles)

For an interactive app and practical tool for thinking through tough choices, check out #ethicsapp: Making an Ethical Decision (<https://legacy.scu.edu/ethics/ethical-decision/>)

Part Two: Practices and Case Studies

As colleges and universities navigate the potential impacts of an earlier FAFSA using prior-prior year income data, many are considering policies and processes that impact multiple areas across the institution, including:

- Enrollment goals and strategies
- Admission and financial aid deadlines and calendars
- Student communications
- Appeal processes for special circumstances

These shared areas of focus have one thing in common: the students served. With good collaboration and planning, your students can benefit from prior-prior year while balancing your multiple institutional concerns.

Part Two of the guide highlights key decisions that institutions may need to make for the 2017-18 admission and award year. For each topic, we have gathered examples, questions, and case studies that explore areas of concern, goals, decision-making considerations, and ethical outcomes that are derived from the four ethical approaches outlined in Part One.

In addition, we have provided promising practices from colleagues in the field whose shared goals are to ensure that students are well served.

Calendar/Award Notification

In order to provide families more time to evaluate their choices, many institutions are considering what may be possible in the way of aligning admission and financial aid notifications by awarding incoming students on an earlier schedule.

Areas of Concern

- Awards that are made too early may not reflect final cost of attendance figures or reliable estimates of Federal Pell Grant, state grant, and institutional aid eligibility.
- Students from lower-income backgrounds and low-resourced high schools may submit their applications and file their FAFSAs later than their more affluent peers.

Decision-Making Considerations

- What does it mean to provide an award that is reliable enough to assure students (and parents) of some certainty and stability in the award?
- Will your award notification strategy include estimated awards?
- When is an estimate “close enough to be helpful” to a first-time student making an enrollment decision?
- What is your institution’s commitment to backing an estimate with campus funding if external funding sources don’t materialize?

- For institutional scholarships that may be awarded and communicated separately from the need-based award process, does an earlier FAFSA present a greater opportunity to align processes?
- Will your institution combine all awards into one notification and present the family with the full aid eligibility picture earlier than in the past?
- Is your policy to award aid on a first-come, first-served basis? If so, applicants who apply early will have an advantage over later filers, which could be even more pronounced due to the earlier availability of the FAFSA.
- Could your awarding policy change the economic distribution of your incoming class and violate the ethical standard of fairness?
- How will you manage funds and communications to ensure that lower-resourced students are not disadvantaged?

Ethical Outcomes

A utilitarian approach would suggest that a good outcome is achieved when students and families have more time to consider their options and are basing their decisions on solid information about their full financial aid eligibility.

Both the fairness and common good approaches would require that all students have equal or proportionate access to funds for which they demonstrate eligibility.

PROMISING PRACTICES

✔ Provide information earlier

If your goal is to provide information earlier, you might consider awarding in “fund categories” (e.g., gift assistance, work, loans) instead of specifying individual programs. This type of approach would be similar to your setup for your net price calculator and allows you to be less dependent on knowledge of specific funding sources, such as state grants.

✔ Reduce confusion for students

Multiple and frequent award revisions may create confusion. If significant numbers of your entering students tend to receive scholarships from external sources, consider the pros and cons of producing a revised notification after every revision versus providing updated award notices periodically.

Deadlines

Institutions are evaluating their admission and financial aid deadlines in the context of a shifting calendar and earlier availability of the FAFSA.

Area of Concern

The National Association for College Admission Counseling (NACAC) recognizes that the college application process is increasingly influenced by marketplace forces. The earlier availability of the 2017-18 FAFSA has the potential to create significant changes in application and admission processes, accompanied by pressures to boost yield and competitive positioning by expediting financial aid offers.

PROMISING PRACTICES – ADMISSION DEADLINES

✔ Allow students more time to plan and make informed decisions

NACAC encourages colleges and universities to work toward the goal of the earlier FAFSA, which is to allow students more time to plan and make informed enrollment decisions. Adhering to this objective and the key principles of practice as outlined in the NACAC *Statement of Principles of Good Practice* (SPGP) is critical to students benefiting from the earlier FAFSA.

A long-standing agreement among NACAC postsecondary members holds that no institution will establish application deadlines for first-year candidates for fall admission prior to Oct. 15. Further, students who are admitted through regular decision will have until May 1 to respond to an offer of admission.

PROMISING PRACTICES – FINANCIAL AID DEADLINES

✔ Make a data-informed awarding strategy

When evaluating the possibility of offering financial aid awards earlier, ensure good outcomes for students with data-informed budgeting and well-planned awarding strategies.

⚙ Resources

Letter from U.S. Department of Education discusses key dates:

(<https://www.nasfaa.org/uploads/MessagefromUnderSecretaryTedMitchell0808201631.pdf>)

Letter to presidential higher education associations from congressional leaders:

(https://www.nasfaa.org/uploads/tn/7616_ppy_implementation_letter_2_.pdf)

NACAC: *Statement of Principles of Good Practice*

(www.nacacnet.org/spgp)

A Case Study: Admission and Financial Aid Deadlines

Institution Highlights

- Large, comprehensive four-year public university
- 32% of students receive Federal Pell Grants
- 81% of students receive grant or scholarship aid

Goals

Improve the rate of FAFSA completions and maintain or increase the percentage of Federal Pell Grant recipients attending the institution.

Background

- The transition to prior-prior year provides an opportunity to evaluate how deadlines and schedules may help or hinder these goals.
- This institution currently has two admission application deadlines: mid-October and mid-January.
- Financial aid is awarded on the basis of the FAFSA.
- Aid applicants are encouraged to file early to maximize federal funding opportunities. Awards are not completed and provided to applicants until they are admitted.

Approach

Campus enrollment and financial aid leaders discussed the pros and cons of maintaining or changing current deadlines and admission and aid schedules. Values, principles, and mission weighed heavily into their approach and decision making. Support of the underlying tenet of allowing students more time to consider their aid eligibility also influenced the policy decision.

Through these conversations, the group agreed upon a mutually beneficial goal of improving FAFSA completions and maintaining the institution's focus on Federal Pell Grant-eligible students.

Ethical Considerations

In making a policy decision related to deadlines, the team considered which options would do the least harm to lower-income, Pell-eligible students. In this example, the institution decided to take a "status quo" approach to application deadlines and to investigate new opportunities to achieve its goals. The current early action admission deadline of October and the later admission deadline of January are believed to adequately serve the mission and student applicant pool. Creating a priority financial aid deadline earlier in the calendar was deemed to be detrimental to the population of students that this institution endeavors to serve well.

Tactics

Outreach and recruitment were defined as opportunity areas where tactics could be initiated to help reach enrollment goals and where the success of PPY could be achieved. In the past, the financial aid office took the lead in FAFSA completion efforts. Going forward, the admission and aid offices will partner to deliver key aid messages and will work jointly in outreach efforts to

improve FAFSA completion rates. A new benefit from this joint approach and shift in timing of the FAFSA application is that students will be able to sit down with staff members and complete the FAFSA during a fall visit.

PROMISING PRACTICES

✔ Provide early, clear messages about affordability

Historically, enrollment leaders had to guess which applicants might be Pell Grant eligible when the FAFSA results arrived later than the admission application or not at all. The dean of enrollment believes that in coming years the FAFSA results will arrive earlier, allowing for more targeted messaging that will help students have a clearer picture of affordability earlier than ever before. He stated, "... now we will know who the Pell-eligible students are earlier than ever and can provide help and assistance earlier in the process." Metrics on Pell Grant-eligible students will be followed carefully to see if new outreach efforts for this subset of students are successful in achieving mission and enrollment goals.

The director of financial aid shared that communications will be equally important in their outreach efforts. The tone of targeted messaging to students will be one of encouragement and not pressure. He stated, "... our web page for 2017-18 explains to new students the benefits of early filing. We hope this approach will reduce any barriers or pressures a lower-income family may perceive in the application process." Note the example below.

EXAMPLE

New Students: Receive Your Financial Aid Award Early

The 2017-18 Free Application for Federal Student Aid (FAFSA) will be available for you to submit starting on Oct. 1, 2016, which is several months earlier than in the past. This may give new admitted students more time to evaluate and compare financial aid awards and make an informed decision about which college to attend. For this reason, some students may want to complete the FAFSA when it becomes available on Oct. 1, 2016.

✎ Implementation Tips

- Recognize and discuss the ethical issues surrounding admission and aid deadlines.
- Reaffirm mission and common goals across enrollment, admission, and financial aid.
- Weigh the trade-offs of potential decisions.
- Note the barriers that may need special consideration in executing your plan or decision.
- Establish tactics and practices to support your goal and decision.
- Establish a data feedback loop to evaluate your plans.

⚙ Resources

NACAC: [Prior-Prior Year: What You Need to Know COLLEGES AND UNIVERSITIES](#)

College Board: [Prepping for Prior-Prior Year: Key Questions for Admission Offices](#)

Communications and Outreach

The multiple changes related to applying for admission and aid for academic year 2017-18 will require clear and frequent communication with new as well as returning students. It will be more important than ever to develop effective content and materials to inform students, parents, and other key constituents.

Approach

As with any communications plan, you'll want to consider the following:

- Who are the key audiences or constituents you need to inform?
 - ▶ Students (e.g., new first-year, new transfers, returning, grad/professional)
 - ▶ Parents
 - ▶ School counselors and college access organizations
- What information does each of these audiences need to receive and understand?
- When does each audience need to receive the information?
- What action do you need each audience to take, and when?
- What messages have been shown to move these audiences to take the action you need?

PROMISING PRACTICES

- ✔ **Emphasize FAFSA completion**, and comment on the process being easier than in the past.
- ✔ **Encourage the use of the IRS Data Retrieval Tool (DRT)** for both new and continuing (2016-17) students to facilitate completion and accuracy.
- ✔ **Explain any changes** in deadlines that could affect new or returning students.
- ✔ **Discuss and set expectations** regarding the timing of award notifications, revised awards, and other steps related to delivery of aid.
- ✔ **Use the opportunity of a longer window of time** to provide frequent communication of file status and to maintain engagement of prospective students during the yield period.
- ✔ **Describe policies and processes** related to appeals/special circumstances (see case study to follow).
- ✔ **Consider at what point** you may need to deliver separate streams of communication for new versus returning students.

The following examples of student communications — using key talking points from Federal Student Aid — can be a helpful starting point.

EXAMPLE

New/First-Time Filer Students:

Did you know that x percent of students attending NAME OF COLLEGE receive financial aid and the average award is \$X? You might be eligible, too. Start the process by filling out the 2017-18 Free Application for Federal Student Aid (FAFSA), which will be available starting Oct. 1, 2016. The FAFSA is available earlier than in the past, in order to give you more time to make an informed decision about where to go to college and how to pay.

Note: To receive your maximum financial aid eligibility, file your FAFSA by NAME OF COLLEGE's priority deadline: xx/xx/xxxx.

In addition, if you are a resident of NAME OF STATE, be sure to file by the state grant priority deadline of xx/xx/xxxx.

Get ready for the FAFSA by creating an FSA ID — a username and password combination that you'll use to sign the FAFSA and access certain websites related to your federal financial aid.

Visit StudentAid.gov/fafsa to create your FSA ID, find out what information you'll need, and learn how to fill out the FAFSA.

For more information about NAME OF COLLEGE's financial aid programs, visit [\(link to website\)](#).

EXAMPLE

Current/Continuing College Students:

You might have heard about some changes to the Free Application for Federal Student Aid (FAFSA). Don't worry; these changes were put in place to make the FAFSA process easier. Starting with the 2017-18 FAFSA, there will be two major changes:

1. **You'll be able to submit your FAFSA earlier.** You can file your 2017-18 FAFSA as early as Oct. 1, 2016, rather than beginning on Jan. 1, 2017. The earlier submission date will be a permanent change, enabling you to complete and submit a FAFSA as early as Oct. 1 every year from now on. If you file the FAFSA earlier, you'll have an earlier indication of how much you and your family will be expected to contribute, which will help with budgeting for the upcoming school year.

- Note: To receive your maximum financial aid eligibility, file your FAFSA by NAME OF COLLEGE's priority deadline: xx/xx/xxxx.

- In addition, if you are a resident of NAME OF STATE, be sure to file by the state grant priority deadline of xx/xx/xxxx.

2. **You'll use earlier income and tax information.** Beginning with the 2017-18 FAFSA, you will report income and tax information from an earlier tax year. For example, on the 2017-18 FAFSA you — and your parent(s), as appropriate — will report your 2015 income and tax information, rather than your 2016 income information. This change will make the FAFSA easier because you'll already have done your taxes for 2015 by the time you fill out your FAFSA. This means you won't have to estimate your income information. You may also be able to automatically import your tax information directly into your FAFSA.

For more information about the 2017-18 FAFSA and financial aid process, visit (link to campus financial aid website) and attend one of our workshops, scheduled on the following dates:

xx/xx/xx

xx/xx/xx

Implementation Tips

- Consider including a suggestion to renewal filers to update their 2016-17 FAFSA data using the IRS Data Retrieval Tool (DRT) so that their income will match for both FAFSA year applications. See case study to follow.
- Consider adding a message about notifying the financial aid office if circumstances have changed significantly since 2015; i.e., your appeal procedure. See case study to follow.

Resources

Federal Student Aid Resources for 2017-18 FAFSA:

<https://financialaidtoolkit.ed.gov/resources/federal-student-aid-resources-for-fafsa.pdf>

A Case Study: Returning Student Communications

Institution Highlights

- Small liberal arts university, private not-for-profit
- 33% of students receive Federal Pell Grants
- 20% of students receive state grants
- >60% receive federal loans

Area of Concern

Returning students may not be aware that conflicting information could impact current financial aid awards.

Background

- The move to an earlier FAFSA using prior-prior year income information creates a unique situation for returning students with 2015 tax information used for both the 2016-17 and 2017-18 FAFSAs.
- Although returning students will use the same tax year information and data to complete the 2017-18 FAFSA, they may update or change their application information. If conflicting information results from these separate applications using common 2015 tax year data, student financial aid eligibility could be impacted and the institution could be faced with additional administrative burden.

Goal

Minimize conflicting student application data, especially for Federal Pell Grant and state grant recipients.

Approach

Financial aid and enrollment leaders collaborated to develop a communication plan that included gathering information and informing admission, student accounts, financial aid, registrar, and marketing teams.

Each functional area represented has a high level of interaction with students during the financial aid process. A common concern of all stakeholders was ensuring that the returning student population had the information they needed since the process would be changing dramatically for them from what they had experienced in previous years.

Tactics

The primary tactic deployed to achieve the goal of minimizing conflicting information was to develop a multipronged communication plan for returning students, including special email campaigns and website messaging.

PROMISING PRACTICES

✔ Send targeted messages to students most at risk

This institution's communication plan includes targeted messaging to students most at risk of reduced aid packages due to conflicting data. To identify these students, data were analyzed across years to isolate Pell Grant recipients who did not complete federal verification or utilize the IRS Data Retrieval Tool (DRT). A similar approach was used for state grant recipients in order to analyze potential impacts.

Once campus leaders understood the filer characteristics and risks, they segmented student populations accordingly and developed unique messages designed to:

- Explain changes in the FAFSA process.
- Emphasize the importance of ensuring that 2015 reported income information matches on both FAFSAs (i.e., 2016-17 and 2017-18).
- Encourage students to update their 2016-17 FAFSA using the IRS DRT if not used previously.
- Instruct applicants to utilize the IRS DRT when completing their 2017-18 FAFSA to ensure consistency.

Messages such as the one below were distributed by email and online through websites.

EXAMPLE

2017-18 FAFSA Changes and How They May Affect Your Federal Pell Grant

We are reaching out to you regarding your Federal Pell Grant and to explain how changes to the 2017-18 FAFSA could affect your award for the current 2016-17 year. This year the 2017-18 FAFSA will be available on Oct. 1, 2016. The 2017-18 FAFSA will ask for the same 2015 tax information used on the 2016-17 FAFSA application.

Conflicting Information Could Impact Your Grant Amounts

Since the 2016-17 school year FAFSA and the 2017-18 school year FAFSA will now both require the same 2015 tax information, it is important that the financial data matches on both years of FAFSA applications. For example, if you have a data mismatch, such as a different Adjusted Gross Income (AGI) on the 2016-17 and on the 2017-18 FAFSAs, the Financial Aid Office will be required to find out which reported AGI is correct. A change in your AGI could affect your financial aid awards in both the 2017-18 and 2016-17 years! **This means that your 2016-17 financial aid could be adjusted in the middle of the school year because of data you report on the 2017-18 FAFSA.**

We recommend that you make sure your 2016-17 FAFSA information is correct. The most efficient way to do this is to use the Data Retrieval Tool (DRT) through the FAFSA. DRT links your FAFSA data to the IRS database and ensures that the FAFSA data matches IRS records. Later, when you are ready to fill out the 2017-18 FAFSA, you should use the DRT again to ensure that all of the data are entered correctly.

Implementation Tips

- Institutional collaboration is key to gaining broad buy-in and support.
- Use data to inform your decisions and formulate your communication plans and goals.
- Consider targeted communications to subsets of students.
- Establish a clear communications timeline within your plan.
- Establish data benchmarks to evaluate the effectiveness of your plan.
- Remember that targeted, segmented messages are important, but this doesn't mean that you need to reinvent the language for each population.

Resources

NACAC: [Prior-Prior Year: What You Need to Know STUDENTS AND FAMILIES](#)

NASFAA: [Sample DRT Email Template](#)

A Case Study: Special Circumstance Appeals and Professional Judgment

Institution Highlights

- Midsize, four-year private university, not-for-profit
- 54% of students receive grant or scholarship aid

Areas of Concern

The volume of appeals may increase with the shift to using prior-prior year data and an earlier FAFSA. Institutional aid budgets and operational capacities are of particular concern, as are implications for yield (appeals are indicators of perceived affordability and also act as a measure of interest in admission yield models).

Background

- This institution provides significant institutional financial aid and has a strong commitment to need-based aid.
- Institutional financial aid is awarded using Institutional Methodology (IM) from data gathered from the CSS/Financial Aid PROFILE®, while federal financial aid is awarded using Federal Methodology (FM) with the results of the FAFSA.
- The offices of admission and financial aid work closely together under a central enrollment management model to recruit, yield, retain, and graduate students.
- The use of prior-prior year income information on aid applications has been a discussion topic on the enrollment management agenda.

Goal

Streamline, plan, and effectively manage the special circumstance appeals process, while delivering a high level of transparency to students who may be considering appealing their financial awards.

Approach

After an internal analysis showed that appeals for special circumstances were a primary concern, the director of financial aid convened an internal working group to evaluate the current process. The group found:

- In the past, the initial request for an appeal was managed in a decentralized fashion by financial aid office advisers.
- Protocols were inconsistent from adviser to adviser.
- Overall, the process could be improved through greater transparency.

What began as an effort to address PPY became a catalyst for broader improvements of the protocols and practices that drive operational efficiency.

Tactics

The financial aid working group developed the following:

- New, transparent communications and messaging to students.
- Clear deadlines that balance the concern of increased appeals with the unknown territory that PPY might bring.
- A discrete budget for appeals to help track usage, yield on students who appeal, and other relevant data that may be beneficial in a year-to-year review of the process.

PROMISING PRACTICE

☑ Map out a proactive plan for appeals

This institution perceived the expanded time for appeals that may result from PPY as a benefit. They capitalized on this by mapping out a proactive plan to encourage and reinforce an appeals schedule with students and families. This plan included:

- Creating a step-by-step appeals guide for families.
- Segmenting the student population and related processing into groups with sequential and unique deadlines: freshmen, transfer students, returning students.
- Updating workflows and operational protocols.

The enhanced process for students includes:

- Clear, student-centric instructions with understandable language.
- Schedules that include submission deadlines and target response dates.
- A new form (below) that includes easy checkoff items to indicate the reason for the appeal along with corresponding documentation requirements.

EXAMPLE

How to Submit an Appeal

The Expected Family Contribution (EFC) formula is the same for all applicants; however, we do understand that a family may have difficulty managing their family contribution due to changes in financial circumstances. If you believe you have a special situation that was not reflected in your aid materials, please follow the guidelines below to appeal your aid package.

A complete appeal packet should include:

- an accepted financial aid award
- a completed Special Circumstance Appeal form
- any statement or documentation that supports your request

When to Appeal

If you are:	You should submit your appeal packet by:	To receive a response on:
A new freshman	mm/dd/yyyy	mm/dd/yyyy
A transfer student	mm/dd/yyyy	mm/dd/yyyy
A returning student	mm/dd/yyyy	mm/dd/yyyy

Special Circumstances for Consideration – check all boxes that apply

Reason for Appeal	Required Documentation
<input type="checkbox"/> Loss of employment	XXX
<input type="checkbox"/> Reduction in anticipated or current year income	XXX

Implementation Tips

- Seek opportunities to improve transparency with families.
- Set expectations by using clear language and establishing achievable deadlines and response times.
- Establish data benchmarks that can be evaluated from year to year.
- Evaluate work flows and determine if segmenting processes by student populations will reduce potential barriers and bottlenecks.
- Review resources and practices developed by and for campus colleagues.
- The College Board’s Professional Judgment Tip Sheets most relevant for PPY include: Estimated Year Income, Fluctuating Income, Exceptional Expenses, and One-Time Income.

Resources

Department of Education: [Dear Colleague GEN -16-03 Use of Professional Judgment When Prior-Prior Year Income is Used to Complete the FAFSA](#)

College Board: [Professional Judgment Tip Sheets](#)

