

Policy for Professional Judgment – Special Circumstances Starting Academic Year 2024-25

Overview

In situations where the Student Aid Index (SAI) and/or the Cost of Attendance (COA) does not accurately reflect a student's financial situation, the Higher Education Act 1965 section 479A as amended allows the International Advice team at Royal Holloway to use its discretion to make appropriate, reasonable adjustments to reflect a student's individual situation more accurately. The situation will always be reviewed for the student on a case-by-case basis. Royal Holloway has disclosed that it has this policy on its website.

If Royal Holloway agrees to exercise Professional Judgment, the options available are to increase the student's COA or adjust the values of the SAI data elements.

The University also has a discretion to deny a student's request. In this case and in keeping with the regulations, the decision of Royal Holloway is final and the student cannot appeal to the Department of Education.

In practice, students receiving or who want to receive Direct Loans and are in this situation should contact the International Funding Advisor at USLoans@rhul.ac.uk to discuss their circumstances (see below).

Authorities for the Professional Judgment Policy:

- [Higher Education Act 1965 section 479a as amended](#)
- [Dear Colleague Letter GEN-22-15](#)

There are two categories of Professional Judgment

- Special Circumstances – Financial circumstances that justify the International Funding Advisor adjusting data elements on the COA or the SAI calculation.
- Unusual Circumstances – Conditions that justify the International Funding Advisor making an adjustment to the student's dependency status (dependency override).

Special Circumstances

Special circumstances are circumstances that cover conditions that exist for an individual student, not a class of students. This is why these circumstances must be considered on a case-by-case basis and are only valid at Royal Holloway.

Examples of situations that are covered by special circumstance include (but are not limited to):

- Change in employment status, income or assets
- Change in housing status eg homelessness
- Tuition expenses for children
- Additional family members enrolled in college
- Medical, dental or nursing home expenses not covered by insurance
- Childcare or dependent care expenses

- Costs for disability of a student, a dependent student's parents or an independent student's spouse or dependents
- Costs relating to Study Abroad

Examples of what is not permitted by Professional Judgment include (but are not limited to):

- Waiving student eligibility requirements to circumvent the intent of the law or regulations
- Modifying formulas or tables in the SAI calculations
- Carrying forward a Professional Judgment from one award year to the next without requesting fresh documentation to review the decision
- Directly changing an SAI
- Establishing automatic categories of special circumstances as all decisions must be made on a case-by-case basis.
- Recurring costs and general living costs
- Reduction of SAI for recurring expenses eg vacation expenses and standard living expenses (eg utilities, credit card expenses etc).

The Professional Judgment Process

There are three steps in this process:

1. **Request initiated** – The student should email USLoans@rhul.ac.uk:
 - a. Explaining the reasons why they are making the request for Professional Judgment
 - b. Describing the basis on which the circumstances should be considered. These should relate to them as an individual rather than being based on circumstances that are applicable to a class of students and
 - c. Providing appropriate evidence to substantiate the circumstances outlined. For example this may include receipts, documents or evidence corroborating the circumstances leading to the request

Note: the request can only be considered while the student is enrolled in their course. It is not possible to consider a request for Professional Judgment after the student ceases to be eligible to receive financial aid.

2. **Request reviewed** – Once the request and supporting documentation has been received, the International Funding Advisor in conjunction with the Head of International and Money Advice will review the request against the principles outlined above. This may include asking the student to provide additional information or documentation and arranging a meeting with the student. Each case will be reviewed on a case-by-case basis.
3. **Decision made** – The International Funding Advisor and Head of International and Money Advice will aim to make the decision five working days after receiving all required documentation. If they are unable to do this, for example due to staff absence, they will notify the student and set a new deadline for the decision.

Once the decision has been made, the International Funding Advisor will inform the student of the decision by email from USLoans@rhul.ac.uk ("the decision email") and outline any

adjustments that they have agreed to make or explain the reasons why they have decided that no adjustment would be made.

If an additional disbursement is required, the International Funding Advisor will liaise with the Student Fees team to arrange a suitable date and will inform the student once this has been agreed.

If the student does not agree with the decision, they must email USLoans@rhul.ac.uk within 5 working days of the date of the decision email explaining the reasons why they object. The International Funding Advisor and Head of International and Money Advice will consider these objections and respond within a further 5 working days of receipt of decision email. As explained above, in keeping with the regulations, the decision of Royal Holloway is final and the student cannot appeal to the Department of Education.