

Family Violence and Financial Aid: A trauma-informed policy analysis of financial aid's
responsiveness to students experiencing violence in the home

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As a victim-survivor of multiple forms of violence, getting to this place often felt impossible. Growing up in the environment that I did, I never envisioned graduate school would be an option for me. In more recent years, several traumatic events challenged me in ways that I could not prepare for. I lost my sense of self, I felt alone, and for a period of time I didn't believe I had a future. My attempts at seeking out help more often than not resulted in being blamed, having my needs ignored, and/or being placed on a seemingly endless waiting list. Even while working towards completing this project, I continued to navigate flawed systems that resulted in me being denied justice. Suffice to say, the path to this point has not been easy. And yet I survived. Through my hope, rage, hurt, resilience, grief, and my somehow undying will to resist every ounce of self-doubt my abusers have caused me – I got here. They can't take that away from me.

But my journey to this current place is much bigger than this capstone. On December 6, 2016, after being invited by one of my professors at the time, I attended a Sexual Assault Awareness Month planning meeting. It was at this meeting that I first raised the idea of starting a student organization dedicated to supporting survivors of sexual and relationship violence, it also served as my first introduction to the person who would become my mentor and co-conspirator for years to follow. Now, on December 6, 2019, I'm submitting this paper, and am transitioning out of the university to begin my career in SRV work out in my community. My ability to complete this project, cannot be separated out from my work over the past three years nor from the support I have received from chosen family, friends, faculty, and staff along the way. As such, I believe it's important to acknowledge those folks as well.

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“I never wanted to just be a ‘survivor’ of violence, because that sounded like I was just getting by. I wanted and want to triumph and grow and revolutionize my soul, my spirit. To challenge myself and my community to re-create our shared space as one that is safe for me, and for all womyn who have experienced violence.”

- Cristina Meztli Tzintzun
Killing Misogyny

“To have to write out every detail of my abuse, everything that disgusts me and makes me want to melt away, all just to hand it to a group of strangers who will evaluate whether or not I’ve been abused bad enough that they think I should be allowed to try to pay for college by myself. I made it through the [dependency override] process, but I still hate it all...It shackles people who want a better future despite a difficult past.” – Reddit¹ user u/mightbeaperson, family violence survivor (accessed: October 19, 2019)

Introduction

Independence is a cornerstone of pursuing higher education. Applying for college, registering for classes, deciding on a major, completing coursework, and maintaining a passable grade point average to graduate, are all the student’s responsibility - no parental permission or involvement is required. The exception? Applying for financial aid.

Most students between the ages of 18 and 24, are considered “dependent” by federal financial aid policy. Dependent students and their parents are required to report their financial information when applying to receive aid to cover tuition and housing expenses. In the past thirty years, tuition has nearly tripled in cost at public universities in the U.S (College Board, 2019). Student loans now constitute the largest portion of non-housing debt (Maldonado, 2018). This is not surprising given that tuition has increased at a rate eight times faster than the annual growth in wage earnings (Maldonado, 2018). Now, more than ever, students require financial aid to offset the increasing cost of a college degree. Yet, while all students and parents are required to complete the same financial aid form, not all family dynamics are the same. For

¹ While conducting background research for this project, the author found numerous Reddit threads from students who had applied for dependency overrides and students who were seeking advice on how to receive an override. These by-survivors-for-survivors discussion boards create space for students to share information on how dependency overrides work and what to expect, to act as advocates/advisors for one another, to show support to each other both as it relates the override process and shared trauma backgrounds, and they also offer a place for students to name parts of the dependency override process that do not feel good, as demonstrated by the quote above. The author reviewed several dozen of these forums, however, they were not reviewed systematically, and therefore their content and themes have not been included in this paper. The author encourages readers to explore these forums as a way of understanding student victim-survivor’s experiences – the challenges, barriers, and successes – in attempting to secure dependency overrides. This post is a good starting place: https://www.reddit.com/r/raisedbynarcissists/comments/2we1dz/how_i_managed_to_get_a_dependency_override_the/.

students being abused by their parents, either in the present or past, this process can gravely impact their ability to apply for and receive financial aid to attend college.

One option that exists for students experiencing family violence is a dependency override, a mechanism that, in special cases, can switch a student from dependent status to independent, allowing the student to forgo including their parents in the financial aid process. However, as experienced by the family violence survivor quoted above, dependency overrides present their own challenges and limitations which will be elaborated upon in the forthcoming sections of this capstone.

The following paper presents the findings of a project aimed at understanding two key questions: How does the dependency override process operate in practice. That is, who does it serve, what steps must students take to request an override, and how are overrides approved or rejected. And, to what extent does the dependency override process align with trauma-informed care principles? The author argues that current financial aid policies position survivors of family violence to experience simultaneous forms of disempowerment that jeopardize their well-being, their safety and their ability to secure financial aid. To support this claim, the author will provide evidence from a content analysis of relevant financial aid policies, secondary research of trauma-informed care principles and practice, in addition to information collected from interviews with the directors of financial aid from three Washington universities concerning their dependency override procedures.

This capstone will begin by grounding the reader in the literatures and histories of financial aid policy, family violence, financial abuse, and trauma-informed care, and where relevant, their interplay. Following the historical and theoretical context, the methods used to answer the guiding research questions and analysis procedure will be described. Next, the findings will be presented. Afterwards, the author will explain and discuss the dependency override practices utilized by Washington universities. The paper will conclude with policy

recommendations for promoting equitable access to financial aid for student, family violence survivors.

Understanding Violence in the Home

There are several terms used to describe abuse that occurs within the home. Family violence, sometimes used synonymously with domestic violence and intimate partner violence, refers to violence committed against spouses and their children, but may also be used to describe violent patterns and behaviors within any familial relationship (Durose, 2005). Child abuse or child maltreatment is defined in federal law as “any recent act or failure to act on the part of a parent or caretaker, which results in death, serious physical or emotional harm, sexual abuse, or exploitation, or an act or failure to act which presents an imminent risk of serious harm” (Child Welfare Information Gateway, 2016, p. 1). A child, in these instances, refers to someone under the age of 18 who is not an emancipated minor (Child Welfare Information Gateway, n.d.). And yet, abuse does not automatically stop when individuals turn 18. A review of the literature concluded that a term does not yet exist for young adults over the age of 18 who continue to be abused by their parents. As such, the broad term "family violence" is used throughout this paper to denote parent-perpetrated abuse against dependent students ages 18-24.

Family violence occurs at alarming rates. A 2006 national study revealed that an estimated 15.5 million American children were exposed to domestic violence at least once in the previous year and 7 million lived in families where there was severe partner violence (McDonald, et al., 2006). Researchers also found that intimate partner violence occurred at a higher rate among couples with children compared to couples without children. Additionally, in 2017, Child Protective Agencies (CPS) received 677,030 reports of child abuse against children ages 14-17 (Child Welfare Information Gateway, 2016). In just one year, over half a million teenagers nearing college-age were being abused, and that only reflects reported cases. As recognized with other forms of violence - domestic violence, sexual assault, rape - survivors are

less likely to report these crimes for a multitude of reasons, including fear for their safety or not being believed. Therefore, it can be assumed that the number of teenagers affected by abuse is greater than those reported by CPS. Prevalence rates for young adults between the ages of 18 and 24 experiencing parent-perpetrated abuse were unable to be located at this time.

Regardless of the type of abuse (physical, emotional, sexual, financial, etc.) or the relationship in which they occur (e.g. intimate partner violence versus child abuse), power and control is at the epicenter of violence (Callaghan, 2012). Many iterations of power and control frameworks have been developed by state and national anti-violence agencies to illustrate the various tactics individuals who abuse use to maintain power and control. These abusive strategies include isolating the victim-survivor from friends and family, intimidation and threats, withholding of resources (food, money, transportation, cell phones, etc.), physical and psychological berating, inflicting harm on the victim-survivor's loved ones such as children, siblings, or pets, among others (Humphreys & Stanley, 2006; Chavis & Hill, 2009). One of these frameworks, coercive control, offers critical considerations for the parent-child dynamic.

In Hamberger, Larsen, and Lehrner's (2017) review of the literature, the authors identified three consistent facets of coercive control: 1) the perpetrator intends to cause harm, 2) the victim experiences negative impacts as a result of the abuser's behavior, and 3) the abuser is able to gain and maintain control through deployment of credible threats. Coercive control explains why abused individuals are often unable to simply walk away from the abusive environment. In having every facet of their life overtaken by their abuser – finances, housing, food, employment, etc. - victim-survivors are forced to develop survival strategies that do not jeopardize their safety (Lombard & McMillan, 2013). This is further complicated by the parent-child relationship as the expectation is that the parent will take on the role of caretaker, thereby providing food, shelter, and other basic needs. However, this power, as in any other relationship, can be manipulated to maintain control over the child even into adulthood (Stark, 2019).

For this project, financial abuse is of particular significance given what is known about how abusive individuals use financial resources to harm and manipulate others to maintain power and control. In a 2008 study involving 103 women experiencing domestic violence, it was found that all but one – 99% - had been subjected to financial abuse over the course of the abusive relationship (Adams, 2008). Financial abuse can take many forms, including the abuser interfering with the person's ability to seek and maintain employment or pursue higher education. It also includes actions or behaviors that restrict a victim-survivor's financial autonomy, such as the abuser controlling all of the financial decisions and withholding access to the abused's bank accounts. Additionally, the abuser can also financially exploit the victim-survivor by accruing debt in the abused's name, stealing money, refusing to work, among other tactics (Adams, 2008). The toll of financial abuse can be destructive and far-reaching. A victim-survivor's employment, education, credit rating, financial stability, access to housing, and their ability to leave the abusive environment, can all be put in jeopardy when financial abuse is present.

At this time, the author was unable to find literature that discussed financial abuse within the context of the parent-child relationship. Despite this gap in the literature, it is reasonable to assume, knowing how power and control operates in abusive relationships, abused children are even more vulnerable to this form of abuse, particularly given that they are by definition dependent upon their parents.

Impacts of Living with Violence.

Living with violence has long-term consequences. Individuals experiencing abuse are more likely to develop mental health conditions with symptoms that can make navigating their day to day life immensely challenging. This may include avoidant behavior, irritability, fatigue, dissociation, panic attacks, among others (Prock, 2015). Managing these symptoms also carries with it an economic burden. Covering expenses for therapy and medication, accruing lost wages from having to take time off of work to go to the doctor, and being unable to maintain long-term

employment as a result of these symptoms, can increase the financial precarity of a victim-survivor (Prock, 2015). Additionally, children who grow up in abusive environments are at a greater risk for substance abuse (Banducci, Hoffman, Lejuez, & Koenen, 2014) and attempting suicide (Martin, Dykxhoorn, Afifi & Colman, 2016). In this way, victim-survivors must not only overcome the immediate, present abuse, but also manage the long-term effects of abuse that can last indefinitely.

However, seeking out support can present its own challenges. Victim-survivors may face any number of barriers while attempting to access services such as not knowing what resources exist or who to contact, questioning whether or not their needs can be met by a support agency, and not being able to visit or contact services because of the abuser (e.g. controlling when the victim-survivor can leave the house, taking their car keys or phone, etc.); as such, victim-survivors may avoid these resources as a form of self-protection (Patterson, Greeson & Campbell, 2009). Additionally, victim-survivors may fear that by receiving services their privacy will be violated, that their abuser will find out, friends and family will judge them, and/or worry they will not be believed (Fugate et. al, 2005). Victim-survivors from minoritized communities are increasingly less likely to trust institutional systems and forgo seeking help, because of the long history of oppression and harm the legal, law enforcement, medical, and other systems have perpetrated against communities of color, indigenous folks, the LGBTQIA+ community, and other populations (Krishnan et. al, 2001; Incite!, 2006). Given these concerns, survivors are most likely to disclose their experiences of abuse to friends and other trusted people in their life, if they decide to tell anyone at all, rather than formal support services (Fugate et. al, 2005).

Research has also shown that victim-survivors often do not believe their experiences with abuse are severe enough to warrant services (Fugate et. al, 2005). This can be attributed to the problematic ways laypeople define and make sense of abuse. At the beginning of this section, terms developed by experts in the field, were introduced to define the different forms abuse can take, however, beliefs surrounding what “counts” as abuse to the general public, are far less

concrete. For example, some individuals believe that only physical forms of abuse should be considered abuse, that abuse only occurs within intimate partnerships, or that any person not actively trying to escape an abusive environment surely cannot “really” be being abused (Carlson & Worden, 2005). Specific to child abuse, there are also ongoing public debates over where the line is drawn between socially acceptable forms of punishment/violence against children that are “parental rights” (e.g. spanking and yelling) and when these behaviors cross over into being viewed as child abuse (Gracia & Herrero, 2008). All of these beliefs demonstrate a limited and problematic understanding of how victim-survivors experience abuse. For this project, it’s important to consider how these perceptions and beliefs about what “real” abuse looks like, influences gatekeepers (e.g. financial aid administrators) when deciding which student victim-survivors receive aid.

Supporting Survivors of Family Violence: Trauma-informed Care Practices.

Understanding the various apprehensions victim-survivors may have about seeking out services, it is critical that agencies develop strategies that foster a sense of safety, trust, and care in the survivor. In the past two decades, providers across nearly every sector of social services have started integrating trauma-informed practices into their work to do just that (Substance Abuse and Mental Health Services Administration, 2014). This includes substance abuse counselors, social workers serving the unhoused population, caregivers for (dis)abled individuals, healthcare providers, domestic and sexual violence advocates, among others. The foundation of a trauma-informed approach is built on 1) realizing trauma exists in the lives of those accessing services 2) recognizing the signs of trauma and how it manifests 3) responding to trauma following the six principles of trauma-informed care (described below) and 4) resisting re-traumatization of trauma survivors (SAMHSA, 2014). The Substance Abuse and Mental Health Services Administration (SAMHSA), a leader in developing trauma-informed best-practices and creating trauma-informed resources for service providers, has identified six principles of trauma-informed care:

- 1) *Safety* - Throughout the organization, staff and the people they serve, whether children or adults, feel physically and psychologically safe; the physical setting is safe and interpersonal interactions promote a sense of safety.
- 2) *Trustworthiness and Transparency* - Organizational operations and decisions are conducted with transparency with the goal of building and maintaining trust with clients and family members, among staff, and others involved in the organization.
- 3) *Peer Support* - Peer support and mutual self-help are key vehicles for establishing safety and hope, building trust, enhancing collaboration, and utilizing their stories and lived experience to promote recovery and healing.
- 4) *Collaboration and Mutuality* - Importance is placed on partnering and the leveling of power differences between staff and clients and among organizational staff from clerical and housekeeping personnel, to professional staff to administrators, demonstrating that healing happens in relationships and in the meaningful sharing of power and decision-making. The organization recognizes that everyone has a role to play in a trauma-informed approach.
- 5) *Empowerment, Voice, and Choice* - The organization fosters a belief in the primacy of the people served, in resilience, and in the ability of individuals, organizations, and communities to heal and promote recovery from trauma. The organization understands that the experience of trauma may be a unifying aspect in the lives of those who run the organization, who provide the services, and/ or who come to the organization for assistance and support. As such, operations, workforce development and services are organized to foster empowerment for staff and clients alike. Organizations understand the importance of power differentials and ways in which clients, historically, have been diminished in voice and choice and are often recipients of coercive treatment. Clients are supported in shared decision-making, choice, and goal setting to determine the plan of action they need to heal and move forward. They are supported in cultivating self-advocacy skills. Staff are facilitators of recovery rather than controllers of recovery...
- 6) *Cultural, Historical, and Gender Issues* - The organization actively moves past cultural stereotypes and biases (e.g. based on race, ethnicity, sexual orientation, age, religion, gender identity, geography, etc.); offers, access to gender responsive services; leverages the healing value of traditional cultural connections; incorporates policies, protocols, and processes that are responsive to the racial, ethnic and cultural needs of individuals served; and recognizes and addresses historical trauma (SAMHSA, 2014, pp.10-11).

In other words, by following the TIC principles identified above, agencies can reduce the risk of causing additional harm to survivors.

In a 2015 study conducted by the National Center on Domestic Violence, Trauma, and Mental Health, 45 domestic violence agencies were interviewed regarding how trauma-informed

care was being incorporated and survivor feedback on TIC practices (NCDVTMH, 2015). Some of the ways agencies adopted TIC was through expanding traditional physical safety planning to include emotional safety planning, offering on-site trauma-specific counseling services, adding wellness practices (e.g. yoga, arts-based activities, etc.), increasing the accessibility and quality of shelters (e.g. reducing the restrictions of who qualifies to stay at a shelter, ensuring all survivors can successfully navigate and feel comfortable in the space, etc.), incorporating cultural practices (e.g. traditional healing practices, storytelling, participating in ceremonies, and celebrating holidays), among many others. By following a TIC approach, agencies reported that in their program evaluations survivors reported feeling an increased amount of trust with agency staff members, feeling seen/heard/valued, and felt more comfortable accessing services – outcomes that should be mirrored as abused students access to financial aid.

Integrating TIC into service provision does not have to be restricted to agencies who exclusively serve victim-survivors of family violence. Ko et.al (2008) argue for “continuity of care across service systems,” (p.401) by way of training staff in TIC principles, supporting collaboration between trauma experts and community practitioners, rigorously evaluating services on their alignment with TIC, among others. This approach works towards mitigating re-traumatization as victim-survivors of violence navigate from system to system in search of resources from advocates, law enforcement, first responders, doctors, educators, and the like. This trauma-informed community response ensures that accountability is shared across service providers whether or not serving victim-survivors is the primary function of their work. Translating this idea to the campus context, financial aid offices can be understood as one service provider within a broader, systematic response to providing trauma-informed care to student survivors of family violence across the university.

One organization that encourages universities to adopt a TIC approach is the American College Health Administration (ACHA). The ACHA has produced both short-form guidance on implementing TIC practices into campus services (2016) and also developed a comprehensive

TIC toolkit for universities that detail public health frameworks, best practices, and strategies for introducing TIC into the campus context (2015). As an agency committed to addressing public health issues, the ACHA views TIC as a mechanism that supports more positive health outcomes for individuals living with trauma, past or present (2015). However, the ACHA also names the importance of having a university-wide commitment to integrating TIC, in order for these efforts to be meaningful and productive (2015). Similar to Ko et al, the ACHA recommends that campus units collaborate to identify opportunities for TIC to be applied across the university, rather than relying on victim advocates, health and wellness staff, and/or counselors to carry that burden on their own (2015). With this in mind, what role does financial aid play in serving students through a TIC framework?

Financial Aid Overview

Financial Aid History and Oversight

In 1965, the Higher Education Act (HEA) was signed into United States law by President Lyndon B. Johnson with the goal of making higher education more accessible to lower- and middle-income families (Pell Institute, 2003). The HEA, specifically Title IV, authorized several federal financial aid programs to assist families in covering the expenses of college (Hegji, 2016). In the decades following its inception, the HEA has been amended numerous times, and was most recently reauthorized in 2008 under the Higher Education Opportunity Act (Hegji, 2018). Initially, this reauthorization was set to expire at the end of fiscal year 2015, however, Congress has conditionally renewed it each year since then (Hegji, 2018). As of 2019, the House Committee on Education and Labor is set to propose an amended HEA that should be introduced by 2020 (American Council on Education, 2019).

At the federal level, the Secretary of Education and Office of Postsecondary Education (OPE), which reside under the larger Department of Education, are responsible for implementing the procedures set by Title IV of the HEA (Hegji, 2019). This includes determining which institutions are able to offer financial aid to their students, establishing

accreditation standards for these institutions, and developing protocols for universities to report their financial aid information to the federal government such as the number of students receiving aid, the award amounts, etc. (Hegji, 2019). The OPE oversees the Information for Financial Aid Professionals (IFAP) office which develops the annual handbook that all financial aid administrators are expected to follow. Included in this handbook are “professional judgment” guidelines which will be discussed in detail later in this paper (Hegji, 2019). While the federal government sets the procedures for how financial aid is operationalized, it is not involved in regulating how institutions distribute aid. Instead, colleges receiving Title IV funds are audited annually by an accrediting agency, designated by the Department of Education, to ensure each school is in compliance with Title IV (NASFAA, n.d.). Auditors are required to report any mishandlings and violations to the DOE. Institutions found to be violating Title IV procedures, such as making unreasonable "professional judgment" decisions, may face sanctions from the Department of Education including fines and temporary or permanent loss of access to federal funds (Hegji, 2019).

Now understanding the governing agencies of financial aid, the following sections present the process students follow to receive aid, the steps financial aid administrators take to decide the amount of aid a student is awarded, as well as describing financial aid appeals such as dependency overrides.

Types of Financial Aid.

During the 2017-2018 school year, undergraduate and graduate students who completed the Free Application for Federal Student Aid (FAFSA) form received \$241.3 billion in federal financial aid (Baum et. al, 2018). These awards were disbursed through grants, loans, and tax credits/deductions (Baum et. al, 2018). Two federal grants, the Pell Grant and the Federal Supplemental Educational Opportunity (SEO) Grant, are available to students with “demonstrated exceptional financial need” (Federal Student Aid, n.d.b). Students who receive both grants during the 2019-2020 school year may be awarded over \$10,000 that they are not

required to pay back to the government (Federal Student Aid, n.d.a). In some states, such as Washington, students who are eligible to receive a federal Pell grant, automatically qualify for supplemental funding from state grant programs such as the Washington College Grant (WCG) (Washington Student Achievement Council, 2019). For the 2018-2019 academic year, the WCG provided students with the greatest financial need an additional \$6,500-\$9,000 in tuition assistance (Washington Student Achievement Council, 2019). Any government aid a student receives, whether federal or state is dependent on the student successfully completing the FAFSA (FAFSA; Federal Student Aid, n.d.b; Washington Student Achievement Council, 2019). Particularly for students who are reliant upon receiving aid in order to pursue higher education, successfully completing the FAFSA may be the difference between being able to afford a year of classes versus not being able to attend college at all. So how does an individual complete the FAFSA?

Financial Aid Application and Award.

The FAFSA may be completed in one of two ways, students may choose to mail in a paper copy of the document or they have the option to complete an online form. Both application processes include the same set of questions. However, the information required to submit the FAFSA varies according to the student's dependency status. Financial aid policy defines "independent" students as those who are age 24 or older, are married, are enrolled in a Master's or Ph.D. program, have dependent children, are homeless, are an emancipated minor, or those who have served in the U.S. military (Federal Student Aid, n.d.b). Independent students complete the FAFSA on their own and only report their individual income, with the exception of married students who are required to include their spouse's.

Alternatively, "dependent" students, or those under the age of 24 and who do not meet any of the "independent" criteria above, must report their parents' financial information on the FAFSA in addition to their own (Federal Student Aid, n.d.c). To satisfy the FAFSA's requirements, the parent has to provide their financial information including tax returns,

income, and assets, as well as personal information such as their social security number (Federal Student Aid, n.d.c). Failure to include this material automatically results in an incomplete FAFSA and the student's account will be flagged as ineligible to receive financial aid (Federal Student Aid, n.d.a).

After the university receives a student's FAFSA, an administrator from the financial aid office must determine the amount of aid the student is eligible to receive using the Estimated Family Contribution (EFC) scale (Federal Student Aid, n.d.b). With the information reported by the dependent student and their parents, the financial aid administrator calculates the household's annual income, accrued debt, any history bankruptcy, and any other financial barrier that may inhibit the parent(s) from financially supporting the student's education. Once these factors have been considered, the staff member uses the EFC scale to establish the projected amount of monetary support the government expects the student's parents to contribute towards tuition costs. The lower the expected family contribution is, the higher the student's financial aid award will be, and vice versa. If the expected family contribution is high enough, the student will not be eligible to receive financial aid outside of loans. It is important to emphasize that the EFC for dependent students operates on two premises: 1) it assumes the family will offer financial support to the student, and 2) it assumes this support will match the government's estimations. The EFC does not reflect the amount of financial support student's actually receive from their parent(s). For example, a student may have a parent who makes six figures a year, but does not contribute any money towards the student's education. Despite this dynamic, a student in this situation would still receive a high EFC that would make them ineligible to receive the Pell Grant because of their parent's income. Whereas for independent students, their FAFSAs are reviewed the same way, except their EFC is calculated solely based on their individual income. Unless a student is working in a high-paying position (or their spouse is), it is more likely that they will receive an EFC that allows them to receive financial aid.

Upon determining a student's dependency status, the types of aid the student qualifies for (e.g. work study, grants, loans, etc.) and the amount of aid the student is eligible to receive based on the EFC calculation, the student will be sent a financial aid award letter (also referred to as a "financial aid package"). These packages, which may or may not include funding, are awarded at the judgment of each college and university, following federal and state regulations. With few exceptions, this financial aid package will not change until the following year's FAFSA is completed and an updated award is sent to the student (Federal Student Aid, n.d.a). Students can request a financial aid revision for reasons such as losing employment or because of a change in their dependency status, however, this does not guarantee supplemental aid will be offered (Federal Student Aid, n.d.a).

Dependency Overrides.

In some cases, a student is able to change their dependency status from "dependent" to "independent" through a process known as a dependency override. Under guidance provided by the Information for Financial Aid Professionals handbook, students with "unusual circumstances," such as those who have parents who are hospitalized, incarcerated, as well as students who are being abused by their parents, may qualify for this override (Information for Financial Aid Professionals, 2019, p.111). A dependency override allows a student to complete the FAFSA without reporting their parents' information (IFAP, 2019). Their EFC, then, is calculated using only the student's income. Dependency overrides operate as a safeguard for some students who may otherwise be unable to complete the FAFSA and also have the potential to increase aid awards for students with special circumstances due to the lowered EFC. Specifically, for dependent students being abused by their parents, the dependency override can provide an avenue to secure financial aid that is not reliant on their abuser completing the FAFSA.

Complicating Financial Aid - Who is left out?

While the Higher Education Act was intended to make higher education more financially accessible, in practice its strict guidelines have made accessing financial aid historically challenging, if not impossible, for a number of communities. Undocumented students remain ineligible to receive any federal aid, though some states, including Washington, as a result of pressure from undocumented students/activists, have created mechanisms to award state aid to these students (Federal Student Aid 2, 2019). The Washington Application for State Financial Aid (WAFSA) allows undocumented students to apply for state grant money to use towards tuition expenses (WAFSA, 2019). Similar to the FAFSA application, dependent students are required to include their parents' financial and personal information on their WAFSA application, however, this project does not analyze the specifics of this process. Unhoused or homeless youth were only recently, as of 2007, allowed to be considered independent, thereby allowing them to complete the FAFSA without their parents. However, these students are still forced to jump through hoops to prove they are unhoused by way of securing a “homeless youth determination;” a letter signed by a community agency, local shelter, counselors, school district personnel, among others (Crutchfield, Chambers, & Duffield, 2016). Failure to secure this determination may result in no aid being offered. In 1994, under the Clinton administration, a ban was implemented on providing federal financial aid to incarcerated individuals (Nadworny, 2019). Beginning in 2015, the “Second Chance Pell” experiment was authorized by the Department of Education to conditionally offer a limited number of Pell grants to incarcerated individuals (Nadworny, 2019). Activists remain hopeful that the upcoming HEA reauthorization will overturn the more than two decade ban and grant incarcerated individuals the ability to receive financial aid on a permanent basis (Nadworny, 2019).

Dependency overrides too were developed to assist students with unforeseen or special circumstances. However, at this time, it is unknown what work, if any, has been done to understand the successes or limitations in how dependency overrides are supporting those students who are unable to complete the FAFSA as traditionally expected. Furthermore, for

students experiencing violence in the home, it remains to be seen if this process is responsive to the specific needs of abused students.

Method

After concluding the background research on financial aid, family violence, and trauma-informed care, the author sought out the appropriate policy documents to review in order to answer the central research questions: how do dependency overrides operate and in what ways do they follow or diverge from trauma-informed care principles?

Selecting Influential Documents for Review

To begin, the author contacted a colleague who had previously served as a senior financial aid advisor for over ten years at a large, public university. The purpose of this conversation was to understand 1) what process do financial aid administrators (FAAs) follow when reviewing a dependency override case and 2) what resources do FAAs utilize to make these rulings. As we talked, he identified the Information for Financial Aid Professionals handbook as the fundamental document FAAs reference when handling dependency override appeals (IFAP, 2019). The author also scheduled a phone meeting with a director from a national financial aid organization that regularly provides training, toolkits, and policy updates to FAAs. The director reiterated the importance of the IFAP handbook and also described the significance of Title IV of the Higher Education Act. The latter, she described as the federal policy which encapsulates all financial aid protocols (HEOA; Higher Education Opportunity Act, 2018). Both informants, who collectively worked in financial aid for 22 years, shared that there were multiple moments throughout their careers where they felt restricted by dependency override policies to help students in crisis. With this feedback from financial aid experts, the author proceeded with the trauma-informed content analysis using the IFAP handbook and Title IV of the Higher Education Act.

Preliminary Review of Documents and Identification of the Dependency Override Steps

A cursory review of both documents was completed to ensure they were compatible with the project's goals. That is, did the material reference dependency overrides and provided instruction to financial aid administrators on navigating override requests? After confirming this criterion was met, the author conducted a secondary content review to identify the specific

steps of the dependency override process from start to finish. A statement or section in the reviewed texts was considered a step if moving forward with a dependency override appeal was reliant upon that action being performed. Four steps emerged from this process: the student self-identifies as having "special circumstances," the student obtains documentation of their circumstances, the override request is approved or rejected, and finally, the override decision is documented on the student's financial aid file. All of the content relating to these steps in the IFAP handbook and Title IV was copied into a word file and organized according to the corresponding step. Using this extracted information, each step was analyzed according to how it followed or diverged from the trauma-informed care principles - described in greater detail below.

Trauma-Informed Care (TIC) Principles as an Analysis Tool

Having pinpointed the dependency override steps, the author now had to decide on which organization's trauma-informed care (TIC) principles to use for the content analysis. The Substance Abuse and Mental Health Services Administration's principles were selected because the organization has been developing TIC for over 20 years and has funded multiple nation-wide projects aimed at increasing our understanding of how trauma manifests in the body and mind, and how to be responsive to trauma symptoms. Two of these projects, the "Women, Co-Occurring Disorders, and Violence Study" and the "National Child Traumatic Stress Initiative," produced the first comprehensive TIC guidelines to social service providers on serving traumatized individuals, such as those experiencing family violence (SAMHSA, 2014). Social service providers and financial aid administrators are similar in that both act as gatekeepers to resources – resources that can impact a person's ability to purchase food, to pay rent, and of course, pay for tuition. Given this overlap, SAMHSA's TIC principles provided a clear, translatable framework for analyzing financial aid policy and procedures.

After completing an initial review of the financial aid documents, the decision was made to use three of SAMHSA's six TIC principles for the content analysis: "safety", "trustworthiness

and transparency”, and “empowerment, voice, and choice.” In doing so, the author sought to focus the analysis on financial aid’s responsiveness to the most immediate needs of student survivors. That is, the ability to stay safe, to trust the resources being accessed, and being able to communicate needs and share decision-making power. Addressing the remaining three principles, while important for future studies, was beyond the scope of this project.

Coding Procedure and Recording Findings

The author's codebook included individual codes for safety, trustworthiness and transparency, and empowerment, voice, and choice. Additionally, each TIC principle had three micro codes: 1) The TIC principle was explicitly named (e.g. the term "safety" appeared in the text), 2) The dependency override step aligns with the TIC principle (e.g. the step promotes the student's safety), and 3) The dependency override step violates the TIC principle (e.g. the step undermines or jeopardizes the student's safety). “Definitions of abuse “ was a separate code used to track where and how abuse was defined in the financial aid documents. Another code was developed to capture any relevant training financial aid administrators receive on serving victim-survivors of family violence. Codes were applied to the content detailed in Step 2. Following the first round of coding, additional codes were added for “flexibility” and “set rule.” This allowed the author to distinguish between steps in the dependency override process where financial aid administrators had the flexibility to make a professional judgment call and when FAAs were expected to follow clearly defined rules. For accuracy, the coded material was reviewed by the author three times, however, a second individual did not quality check the data.

Unfortunately, the TIC content analysis was only partially effective in answering the research question because of the ambiguity of the documents' language as well as the variability of how the guidance could be implemented in practice. These tensions will be expanded upon in the results section. Given the lackluster outcome of the content analysis, the author sought out supplemental information from Washington universities to learn how various campuses perform dependency overrides.

Interviews with Financial Aid Directors

After the content analysis showed that financial aid officers have a tremendous amount of freedom to make their decisions the author decided to supplement the research with interviews with financial aid directors. Emails were sent to the financial aid directors at all six of Washington state public universities requesting 30-minute interviews. Public universities were selected for inclusion over private institutions because the former receives the majority of federal and state funding. Interviews were intentionally sought out with directors since they have final authority over financial aid decisions. One exception was a staff member at Washington State University who was referred to the project by the director. This specific financial aid administrator's role is to work with students with special circumstances, including those seeking dependency overrides. As such, this staff member took the place of the WSU financial aid director.

The author identified three objectives of the interviews. First, uncovering each institution's dependency override protocol and how this shifts when the student is a victim-survivor of family violence. Second, the need to discern what forms of abuse and what abusive environments warrant a dependency override (e.g. students fleeing abuse versus students who are being abused while living at home). Finally, learning how financial aid offices make consistent dependency override rulings across staff members. The first draft of questions were reviewed by the author's second advisor and another faculty member within the program. With this feedback, and after revisions were made, the interview consisted of seven core questions with three additional questions as time allowed (see Appendix).

Each interview was requested to be conducted via phone; however, one participant opted to respond to the interview questions by email. The phone interviews were audio recorded with the interviewee's consent. Audio files were transcribed using YouTube software and quality checked by the author and a trained peer. Because the interviews were supplemental and not the

focal point of the project, they did not undergo rigorous review; however, general themes are presented in the results section.

Results

The author identified four central steps for receiving a dependency override:

Step 1) The student indicates they have “Unusual Circumstances” on their FAFSA

Step 2) The student provides documentation of their circumstances

Step 3) The dependency override is approved or rejected according to the "professional judgment" of the financial aid administrator

Step 4) The dependency override ruling is documented on the student's file

Each step is presented below with an overview of what the process involves; an illustrative piece of evidence from the reviewed materials; context as to how the step specifically affects family violence survivors; and a breakdown of how the step aligned or diverged from the three trauma-informed care (TIC) principles, "safety", "trustworthiness & transparency", and "empowerment, voice, and choice."

Step 1 of the dependency override process requires students to self-identify as having “unusual circumstances” on their FAFSA application. As described in the IFAP handbook,

On fafsa.gov students can indicate that they believe they have unusual circumstances that prevent them from providing parent information. A student who indicates this is thoroughly informed about what warrants a dependency override and what the results will be for his application. If he persists through those screens and does not include parent data, he will get a rejected ISIR that will have the unusual circumstances flag set (AVG-114, “Unable to Provide Parent Data”).

For family violence survivors completing the FAFSA, it is imperative that they understand how to mark themselves as having unusual circumstances, that they understand what circumstances qualify for an override, and that they are able to complete the FAFSA safely, without the abusive parent. For example, if a student is unable to locate and check the box "unable to complete parent information" on the FAFSA or wrongly assumes that emotional abuse isn't "real" enough to warrant an override, then the student may end up without any financial aid. At the same time, students should maintain the right to determine for themselves whether or not they want to

pursue a dependency override. Step 1 was determined to only partially align with two of the TIC principles and was coded in the following ways:

Safety: This step was coded "absent" because there was no information related to safety concerns nor descriptions for any safeguards that exist for students experiencing family violence. No immediate violations of the TIC principle could be recognized.

Trustworthiness & Transparency: Step 1 did follow, to an extent, the TIC principle of "trustworthiness & transparency." Transparency is promoted by way of students being "thoroughly informed" about the dependency override process before submitting their FAFSA. However, without extensive, longitudinal interviews with students who have applied for financial aid, a task beyond the scope of this project, it is impossible to claim that the information provided to students can qualify as "thorough," visible, and comprehensible to students.

Empowerment, Voice, and Choice: Additionally, step 1 partially aligned with this TIC principle since students have the choice to self-identify as having "unusual circumstances." However, this step also diverged from TIC because the circumstances that qualify for an override are not clearly defined. In other words, this "choice" begins to deteriorate when affected students are unable to discern whether or not their experiences qualify for an override.

The **next step** in the dependency override process expects students to provide documentation of their unusual circumstances. Both Title IV of the Higher Education Act (HEA) and the Information for Financial Aid Professionals (IFAP) handbook state that third-party documentation is required to prove the student is unable to obtain parental information for the FAFSA. This is evidenced by an IFAP quote which says, "Documentation is critical to the dependency override process. The documentation must support, and include the reason for, the decision and should in almost all cases originate from a third party with knowledge of the unusual circumstances of the student" (IFAP Handbook, AVG-114, "Dependency Overrides"). Financial aid administrators reserve the right to request the student to provide any number of

materials relevant to their override request such as police reports, letters from counselors, rent payments, etc. For students surviving family violence, this means providing documentation that substantiates the abuse is occurring or has in the past. At the same time, the IFAP handbook explains that when third-party documentation is unavailable, the university may choose to accept a signed and dated statement from the student or a family member to verify the information. However, they are not required to make this accommodation and the IFAP handbook emphasizes that first-person narratives should be a last resort. As such, it was determined that this step did not align with any of the TIC principles and was assigned the following codes:

Safety: There was not enough guidance included in either document to assess whether or not this step aligned with the TIC principle of safety. Absent from this step's instructions for FAAs was any acknowledgment of the safety threat this step posed to students experiencing violence. Returning to the literature presented earlier, accessing services can escalate abuse or fears of abuse, and it is not always possible for a survivor to safely seek out resources and support. And yet, it is permissible for financial aid administrators to entirely rely on first-party documentation. Therefore, this step cannot definitively be coded as violating the TIC principle of safety. It remains to be known, if or how financial aid administrators use this flexibility to support students in unsafe situations. A review of the IFAP handbook and Title IV concluded that neither document included instructions for how financial aid administrators can prioritize and protect student safety when requesting documentation for dependency override appeals.

Trustworthiness & Transparency: The requirement to provide documentation of abuse goes against this principle namely because there is no consistency in how the step is executed. From one student to the next, a financial aid administrator may change the number of documents s/he/they requires and the permissible sources of these documents (e.g. originating from the student versus from a lawyer). In this way, there is no opportunity for students to

prepare for or trust what the dependency override process will entail because there can be a great deal of variance.

Empowerment, Voice, and Choice: Requiring documentation also violates this TIC principle because it forces the student to disclose their abuse to other individuals. In doing so, the student loses ownership over their own story and experiences. Additionally, in situations where the administrator requires the student to submit documentation from a victim advocate, counselor, or police officer, the survivor is also being stripped of their agency. This forced help-seeking behavior - requiring the student to contact resources that they may not feel ready to engage with or may have no interest in pursuing - does not align with the values of empowerment, voice, and choice.

In **Step 3**, financial aid administrators decide, using their professional judgment, to approve or deny the dependency override appeal. "To account for unusual circumstances of a student, you may choose to exercise professional judgment (PJ) to adjust her cost of attendance or the data that determine her EFC [Estimated Family Contribution]...You might decide that unusual circumstances warrant making a dependent student independent," as described in the IFAP handbook. (IFAP Handbook, AVG-111, "Professional Judgment"). As stated in the IFAP handbook, "An FAA's decision regarding adjustments is final and cannot be appealed to the Department [of Education]" (IFAP Handbook, AVG-111, "Professional Judgment"). However, students denied a dependency override may resubmit an appeal the following year. Students who are approved for an override must resubmit their materials each academic year to retain their designation as an independent student. Financial aid administrators are also instructed to approve overrides on a case by case basis which means a student is never guaranteed an override based on their circumstances alone. Instead, it is the responsibility of the financial aid administrator to make a "reasonable judgment," one which weighs all of the evidence provided by the student to decide if an override is both appropriate given the circumstances and acts in accordance with financial aid policy. Failure to make "reasonable judgments" may result in the

institution being fined as well as potentially losing their accreditation to offer financial aid to students. All of this combined, positions family violence survivors to experience multiple forms of disempowerment, fosters distrust of the system, and may jeopardize their safety. This step violated all three of the TIC principles.

Safety - Denying a family violence survivor a dependency override jeopardizes their safety and therefore does not follow this TIC principle. Doing so may also further disenfranchise survivors, resulting in them being more dependent on their abusers for money, shelter, food, and other necessities. This becomes more serious knowing that a student is forced to wait an entire year, or at the least, one FAFSA cycle, before trying to reapply for an override. Additionally, some forms of violence are viewed by laypeople, including FAAs, as more "real" or "severe" than others. If a FAA believes that emotional abuse is "not as bad" as physical abuse, s/he/they may be more reluctant to grant an override to a family violence survivor who is being emotionally abused, despite that still being a safety risk.

Trustworthiness & Transparency - Because overrides are reviewed on a case-by-case basis, there is never a guaranteed outcome. Furthermore, without clear descriptions of what unusual circumstances qualify for an override, a student could make it to this step in the process and still be told that their request is being declined.

Empowerment, Voice, and Choice - All of the decision-making power surrounding overrides is given to individual financial aid administrators. So much so, that there is no opportunity for the student to appeal a decision once it is made. As such, Step 4 does not align with this TIC principle.

The **final step** in the dependency override process is for the financial aid administrator to formally report the dependency override ruling in their office's system. As described in the IFAP handbook, "If the FAA determines that an override is appropriate, she must write out the determination and retain it and the supporting documentation" (IFAP Handbook, AVG-113, "Dependency Overrides). For family violence survivors, this would mean that all of the

documentation that they provided for the dependency override (e.g. letters from advocates, personal testimonies, police and court records, etc.) would be included in their student file. It is also important to note that dependency override adjustments are only valid at the school that authorized it. If at any time during their education, a student transfers schools, they will have to go through the dependency override process all over again with no guarantee that it will be approved. Given these concerns, this step also violated all three of the TIC principles and was coded as follows:

Safety - In reviewing the IFAP handbook and Title IV it was revealed that there was no discussion of how to maintain the security of these files, who may access them, or how long they are kept on file. Furthermore, there was no mention of confidentiality standards. As such, the author was not able to determine if this step aligns with the TIC principle of "safety" because this guidance was missing.

Trustworthiness & Transparency - Similarly, neither Title IV nor the IFAP handbook described if/how this step is communicated to students. Are students aware that their personal histories are being stored in the financial aid office? Do they know which campus employees can retrieve these files? Will the students be notified when these files are destroyed or removed from the office's records? These questions were not answered in either document. Thus, the author could not discern if this step followed the TIC principle.

Empowerment, Voice, and Choice - Since students are not allowed to decide if, how, or where documents related to their abuse are kept, this step does not adhere to the TIC principle of empowerment, voice, and choice. Without knowing who may access these files, there is also the concern of multiple staff members becoming aware of the student's circumstances. Yet again this takes agency away from the student to decide who is made privy to this deeply personal part of their life. Finally, there is also reason to suspect that a student who was denied a dependency override would not want documents detailing their abuse to be kept on file for a resource they were barred from accessing.

Outside of analyzing the four steps, the researcher also wanted to understand how financial aid policymakers defined abuse. Upon reviewing the two documents, it was found that neither included a definition of abuse nor described the behaviors or actions that they considered abusive. Furthermore, the documents did not list what forms of abuse qualified for an override, however, this was uncovered in the interviews to be discussed in the next section.

In summary, the dependency override process laid out by the IFAP handbook and Title IV does not offer enough detailed guidance to financial aid administrators on working with students experiencing family violence. Moreover, the power and flexibility granted to financial aid administrators when using their "professional judgment" makes it nearly impossible to gauge how aligned/divergent financial aid practices are to TIC because each administrator develops their own standard for the type of documentations they need, or will accept, and also makes their own dependency override ruling. With this new understanding of financial aid policy, the author reached out to financial aid directors at Washington state universities to learn how each campus approached their override procedures.

Interviews.

Financial aid administrators from Washington's six public universities were invited to participate in this project. Of these, four institutions agreed to be interviewed: the University of Washington, Washington State University, Western Washington University, and Eastern Washington University. Five participants were interviewed, as one campus opted to have two staff members present given different areas of expertise. Three of these individuals were the director of their university's financial aid department and two were dependency override specialists.

Across the four institutions, it was found that there is some overlap in how dependency overrides are processed. For example, each of the universities requires students to complete a dependency override appeal form where they describe their circumstances - this is in addition to the documentation students have to collect and submit to verify their situation. All of the

universities also had established committees that were responsible for reviewing dependency override appeals and voting to approve or reject the requests. These committees were mainly comprised of additional financial aid staff, though two universities also involved counselors in the dependency override review process. It was also shared in one case that because of being short staffed, only one individual was able to review and approve/reject dependency override requests at the time of this interview, and had been that way for several months. However, they anticipate returning to the committee model once there is enough staff capacity to do so.

However, there were also stark differences in how each campus handles dependency overrides. First, there were inconsistencies in the number of documents required to submit a dependency override appeal. At Washington State University, students are required to include three letters of support/verification in their dependency override application. The staff member interviewed did say the university does their best to accommodate students who are not able to obtain three documents, but that having three increases the likelihood of the override being approved. Western Washington University, on the other hand, requires students to obtain and submit written statements from “two adults with first-hand knowledge of [the] situation.” The University of Washington and Eastern Washington University also require two letters/pieces of documentation, however, the staff members interviewed shared that this was a flexible requirement – one interviewee specifically added that they did not want providing documentation to act as another barrier for students in crisis.

Next, each campus responds to minor students – those under the age of 18 – who are seeking dependency overrides for family violence, in very different ways. At one university, financial aid staff have completed mandatory reporting training and notify the proper authorities when students under the age of 18 describe experiencing abuse in their home. Per RCW 26.44.030, all personnel in higher education in Washington State are mandatory reporters of child abuse – such as, when underage students disclose being abused by their parents. Meanwhile, one of the other universities “does not treat minor students any differently” and

voiced uncertainty both as to what the laws were and what their obligation in their role was to report such information. At another university, minor students are required to work with their high school counselor to move forward with the dependency override process, even if they have already graduated. The staff member did not offer any details as to whether or not the financial aid office reports child abuse to the required agencies. The last university did not provide information as to how they address situations when minor students disclose abuse. This raises specific concerns for students in the Running Start and College in the High School programs, as well as students who may have begun college at an earlier age than their peers.

There were additional inconsistencies in whether or not the financial aid offices reported students' abuse to campus officials and when they chose to do so. For example, one institution brought up that they were mandatory reporters for Title IX violations, and it was the employee's understanding that in situations where the student was being sexually abused by their parents that they would be required to report but there was uncertainty as to what the requirements were when the student was experiencing physical or emotional abuse. Another university described reporting abuse to their Equal Opportunity Office "as warranted." Similarly, one school also reports abuse to campus offices as seems fit, but the staff member added that they would try to check-in with the student and prioritize their needs and requests first. And the remaining university described reporting abuse to the dean of students, though again, a clear answer was not provided as to when this kind of report is made and to what extent the student gets decide who is made aware of their circumstances.

These interviews also illuminated the different ways financial aid administrators decide which abusive situations qualify for an override and those that do not. Students who had fled the abusive environment and did not maintain contact with the abusive parent(s) were consistently identified by financial aid administrators as being able to qualify for an override. Whereas, for students experiencing abuse while living at home, the answers were more inconsistent. One institution shared that it would be extremely rare for a student experiencing abuse while living

at home to be granted a dependency override, because of the expectation that they would leave the abusive environment if they were being abused – “I mean obviously if they were in a trauma situation they would be calling 911.” Another university shared in an emailed response that:

“Under the current US Department of Education regulations, this student would **not be** eligible for a dependency over-ride as they “have contact” with a parent. However, in any situation where our office is aware of some type of abuse we would work with the student to determine what we can do as we are allowed to look at each situation on a case-by case basis. We would also most likely involve other departments on campus (XXX; Dean of Students, etc) and possibly refer the student to the Department of Social and Health Services.” (emailed interview response, 12/03/2019)

And yet, for the two other institutions, not only was it possible for abused students living at home to secure dependency overrides, but both schools also voiced the importance of providing additional support and resources to the student to help them leave the abusive environment. Furthermore, one of these interviewees voiced frustration knowing that some financial aid offices do not grant overrides to abused students living at home. They attributed this to financial aid professionals not fully understanding the protections that professional judgement grants them and emphasized that so long as the office documents why they made the decision they did, that there should be no reason for the federal government to fine the school. The employee hoped that moving forward, schools would receive more robust training on how professional judgment can be used to protect vulnerable students. And finally, in cases where a parent was refusing to complete the FAFSA as an abuse tactic, there were again differences in how this situation was approached. All participants agreed that so long as there was *additional* abuse (e.g. physical, emotional, etc) that could be documented, then the student would be able to receive an override. However, one of the universities went further by sharing that they recognized financial abuse as a legitimate form of abuse and would do what they could to set the student up for successfully applying for an override.

Regarding the training financial aid officers receive, it was found that three of the four universities do not provide nor require training on serving students who are experiencing abuse. Participants shared that they had previously attended trainings on micro aggressions, sexual

harassment, diversity, as well as sharing some of their college coursework, but these presentations were not explicitly focused on child abuse/family violence nor did they offer best practices on working with students living with trauma in a university context. Another interviewee shared that their campus' Equal Opportunity Office provided a training that referenced students experiencing abuse. This training was required however, it was inferred by the author that this training is not offered consistently as the interviewee shared,

This was required training. However, your inquiry is a good reminder that we should hold such training on an annual basis, so we have asked Equal Opportunity for such training. In addition, we discussed that it would be useful to invite a Counselor from XXX's Counseling Center and CASAS (Consultation and Sexual Assault Support Services) to augment training from EOO (emailed interview response, 11/12/2019).

Finally, it was evident from every financial aid administrator interviewed that they deeply care about their students and want to support them. One of the dependency override specialists who was interviewed described taking walks with students when it was clear that they were feeling overwhelmed, as a way to make the student feel more comfortable. They also shared that they put reminders on their calendar to check-in with the students who they've met with about every month so that they don't feel alone. And this staff member also offers to walk students to campus services that can offer additional support so that all of their needs – beyond financial – can be addressed. Because this employee's role is specific to serving students seeking overrides, they're able to regularly meet with students one-on-one to help the student complete the override appeal, and has a 100% dependency override approval rate to show for it in 2019. And while not every university has a position like this funded, every individual expressed their desire to help students through these challenging situations.

Discussion

The purpose of this project was to understand how financial aid policies and practices aligned with trauma-informed care (TIC) principles. In doing so, the author uncovered that financial aid polices, as written, do not follow trauma-informed care best practices, nor is

guidance provided to financial aid administrators on how to serve students experiencing abuse in a trauma-informed way. Through interviews with financial aid staff from Washington state universities, it was clear that the ambiguity of the language in financial aid guidelines evidently lead to ambiguous and inconsistent practices across four universities. At this time, neither financial aid policies nor practices are systematically operating from a TIC framework.

Below, the author unpacks some of the key findings from this project, the role of professional judgment in supporting or disempowering survivors and the absence of a clear definition of abuse. The paper concludes with recommendations for carrying this work forward to make financial aid policies and practices more aligned with trauma-informed care principles.

May vs. Must – Professional Judgment and the Potential for Dependency Overrides

Professional judgment grants financial aid administrators a great deal of power. Under no circumstances is a financial aid administrator required to approve a dependency override. Instead, they *may* do so on a case-by-case basis using professional judgment. At the same time, with few exceptions, nearly all "unusual circumstances" can be considered for an override. This creates a dynamic where any number of students could theoretically be supported by this resource, and yet an override would never be guaranteed - even for students with ample documentation. Because professional judgment can be applied in any number of ways, there is no way to predict when a student's application will be successful. As such, this does not align with trauma-informed care.

The ambiguity of the guidelines' language could be, and arguably should be, used to support a vulnerable population of students, particularly when there are safety concerns. However, the potential good of this broad language can easily be undermined with an administrator's decision to deny a student the override, which, per the Higher Education Act (HEA) and the Information for Financial Aid Professional (IFAP) handbook's policies, is entirely within their power to do. As described by one of the interviewees, making financial aid administrators more aware as to the protections professional judgement offers students, could

facilitate FAAs feeling more confident and empowered to provide this resource to students experiencing abuse.

Abuse is Not Defined

Abuse is not defined in either the IFAP handbook or Title IV of the HEA. In fact, abuse isn't listed as a special circumstance in the HEA. This creates a situation where financial aid administrators are expected to use their professional judgment to decide whether or not the experiences of the student are in fact "abuse" and if that abuse warrants a dependency override. This leaves the door open for financial aid staff to deny overrides to students experiencing abuse. Earlier in this paper, the author noted that there are many different forms of abuse. Individuals working outside of domestic violence and child abuse agencies may also define abuse in varying ways. As demonstrated in one of the interviews, this definition as to what "counts" as abuse, may also be influenced by preconceived ideas as to how a victim-survivor is expected to respond in an abusive environment. One of the financial aid staff members interviewed repeatedly stated that if a student was being abused at home then they would "obviously call the police." If financial aid administrators are not adequately trained or provided clear guidance, they may not understand the significance of the abuse that a student discloses, particularly if the abuse is not physical. Alternatively, creating too specific of a definition for abuse may fail to encapsulate every student's experience and result in a similar problem.

Furthermore, parent refusal to complete the FAFSA, does not qualify a student for a dependency override, however, in certain situations, said refusal would qualify as economic abuse. Though a parent refusing to complete the FAFSA is not inherently abusive, it is a tactic that abusive parents may use to maintain power and control over their child. Because students who do not provide parent information on the FAFSA are only eligible to receive loans, financially abused students are at a severe disadvantage. As such, this guidance directly contradicts the purpose of the override, which is to provide aid to those in situations that prevent them from securing funding the traditional way.

Financial aid has a great deal of growth ahead if/when policymakers decide to adopt a trauma-informed care. And yet there remains a great deal of potential for financial aid to operate as a survivor support service. The financial security that dependency overrides offer can better situate survivors for financial success, which in turn directly affects a survivor's ability to leave an abusive environment. The override also takes power away from the student's abuser and allows them to make their own decisions which can be empowering and provide needed safety. Additionally, as described in the interviews, financial aid can also serve as an important intervention site for survivors to be introduced and connected to other campus and community resources. In short, the potential for financial aid to be responsive to survivors' needs is there, and there surely have been survivors who have benefitted from receiving overrides, but doing so will require a long-term, systematic commitment to overturning and improving the practices and policies that are currently disempowering family violence survivors.

Recommendations

Informed by the evidence collected through the trauma-informed analysis of financial aid policies as well as interviews with financial aid employees, the author offers the following recommendations for how to carry this work forward:

- 1) Develop a clear, inclusive definition of abuse, ideally bringing in the expertise of domestic/family violence service providers and organizations.
- 2) Make dependency overrides responsive to all forms of abuse (physical, emotional, financial, abuse that occurs while the student lives at home, abuse that forced the student to leave home, etc.).
- 3) Documentation requirements should be consistent and prioritize not overburdening the student survivor - One, third-party document should be sufficient to verify that the student is experiencing abuse.
- 4) Develop strategies for students to contest dependency override rulings.

5) Be attentive to where financial aid administrators are being given explicit instruction versus when they are being asked to use their own judgment, and consider the implications for student survivors.

6) Provide annual training to financial aid staff on family violence and strategies for supporting survivors.

Limitations of the Current Project

Due to time and funding restrictions, including survivors' voices was beyond the scope of this project. This limits the understanding of how current financial aid policies affect those being abused by their parents. Involving survivors in future research projects related to this topic will likely uncover additional areas of attention for policy makers, financial aid professionals, and victim-survivors service providers in the community. Additionally, it would be expected that future projects that incorporate all six TIC principles would reveal additional opportunities for financial aid to more closely align their policies and practices with TIC.

Future Directions

Additional research should be conducted to understand this population of students experiencing parent-perpetrated abuse: the rate at which enrolled college students are experiencing family violence, the specific ways students experience this form of abuse, and its impacts on how they navigate campus life and resources. Expanding this body of literature would assist community agencies who serve victim-survivors of abuse to explore opportunities for developing resources aimed at supporting this specific subgroup. Universities could also integrate this research into their own service provision within victim advocacy, financial aid, counseling centers, and so forth.

Future evaluations of financial aid processes, specifically those exploring dependency overrides, should integrate family violence survivors' voices. In seeking to improve financial aid accessibility, it is important that populations currently being excluded be afforded the opportunity to offer guidance, raise concerns, and describe the implications of current practices.

Moreover, these projects should be attentive to how the various identities survivors hold affects their ability to trust and access resources. For example, in communities where reporting family violence is viewed as being detrimental to the community itself, how can financial aid offices be responsive to these cultural considerations?

Finally, this research would benefit from involving survivor support practitioners. Staff members from community and national sexual and relationship violence agencies would be able to offer their expertise on how to prepare a department to serve victim-survivors, particularly one that is new to the work. They are also well-versed in coalition building which could bridge the gap between college campuses and community family violence agencies.

Conclusion

“To have to write out every detail of my abuse, everything that disgusts me and makes me want to melt away, all just to hand it to a group of strangers who will evaluate whether or not I’ve been abused bad enough that they think I should be allowed to try to pay for college by myself. I made it through the [dependency override] process, but I still hate it all...It shackles people who want a better future despite a difficult past.” – Reddit² user u/mightbeaperson, family violence survivor (accessed: October 19, 2019)

Returning to the quote presented at the start of this paper, it is clear that the intersections of family violence and financial aid demand additional attention. Financial aid must be prepared to respond to the complexity and nuance of family survivors’ lives and situations. Moving towards adopting and centering a trauma-informed care framework, can prevent financial aid from becoming yet another barrier that survivors are forced to overcome in order to pursue their dreams of attending college. Family violence survivors deserve a better future and with some additional development, financial aid can serve as a critical site to make that better future possible.

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Appendix
Interview Questions

1. What steps are students expected to follow when requesting a dependency override? How do they know what the steps are?
2. What sort of training have you received on working with students experiencing abuse? Was this required? Who facilitated it?
3. Scenario 1: A student with dependent status contacts your office and shares that they recently fled their home because of abuse. They're now living with a friend and with the FAFSA deadline approaching they're worried they won't receive financial aid because they don't have any contact with their parents. What do you tell the student and what action do you take?
 - Follow up Q's (dep. on answer): Types of documentation required? From who? What campus-specific forms are filled out?
 - Rationale? (Ex. Is this influenced by campus, state, or federal policy?)
 - How would this change if the student was still living at home at home and being abused?
4. As I understand it, students cannot receive an override if their parents refuse to complete the FAFSA. Is this correct?
 - If the parent refuses to complete the FAFSA as an abuse tactic, how would you be expected to proceed?

5. Am I understanding it correctly that each FAA has the authority to make their own independent dependency override ruling?
 - How does your office ensure that a student will get the same decision regardless of who she meets with?

6. Does your office have a set protocol for handling situations where a dependent student pursuing financial aid is being abused by their parents?
 - If yes, what is this protocol?
 1. Where is it located?
 2. Who has access to this protocol?
 3. How was it developed?
 4. Is information about this policy available on outward facing (student facing) websites/resources?

7. What are your thoughts on how current financial aid policies serve students experiencing violence in their homes? Examples?

IF TIME QUESTIONS

8. Thinking about the previous scenarios, what steps are taken if the student is a minor?

9. What kind of working relationship does your office have with your campus victim advocate?
 - Any plans for the future?

10. Can you recall a time when you wanted to grant a student an override because they were experiencing “special circumstances” but felt restricted by FA policy? What would you like to see change?

