

FINANCIAL AID FOR UNACCOMPANIED HOMELESS YOUTH

A SURVEY REPORT

NCEHCY
NATIONAL ASSOCIATION FOR THE EDUCATION
OF HOMELESS CHILDREN AND YOUTH

 **NASFAA**
NATIONAL ASSOCIATION OF STUDENT FINANCIAL AID ADMINISTRATORS

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EXECUTIVE SUMMARY

In 2007 and 2008, Congress passed legislation (the College Cost Reduction and Access Act of 2007 and the Higher Education Opportunity Act of 2008) which improved college access for unaccompanied homeless youth by making this population independent students by definition and encouraging federally-funded college access programs to serve these students.

In 2012, the National Association for the Education of Homeless Children and Youth (NAEHYC), in partnership with the National Association of Student Financial Aid Administrators (NASFAA) conducted a survey to gather information about the ease with which unaccompanied homeless youth are able to access federal financial aid. Over 900 individuals responded to the survey, representing college access professionals, service providers, public school employees (including school district liaisons), and financial aid administrators. While the survey results indicate that the professional groups claim to understand the requirements of the laws referenced above, barriers continue to exist to students' ability to access the financial resources needed to pursue their postsecondary educational goals. Barriers identified by the survey include the need for a yearly determination of a student's status as an unaccompanied homeless youth, additional documentation requests, financial aid administrators' unwillingness to make required determinations, the restrictive definition of "youth," limitation on shelter providers who can make a determination of a student's status, financial aid office appeal procedures, financial aid office insensitivity and hostility, and issues related to the U.S. Department of Education (ED).

Based on analysis of the survey results, NAEHCY makes the following recommendations:

- Increase training for financial aid administrators;
- Eliminate the need for an annual determination of student status;
- Increased oversight by ED of how financial aid administrators implement policies for unaccompanied homeless youth;
- Expand the entities which can determine a student meets the definition of an unaccompanied homeless youth;
- Revise the definition of "youth;"
- Mandate a standardized appeal process; and
- Designate a point of contact at ED to answer questions and resolve issues when they arise.

INTRODUCTION

In 2007 and 2008, Congress passed legislation intended to assist unaccompanied homeless youth in obtaining Federal financial aid. In 2013, the National Association for the Education of Homeless Children and Youth (“NAEHCY”) conducted a survey to assess the effectiveness of those measures.

The College Cost Reduction and Access Act of 2007 (P.L. 110-84) (“2007 Act”) included provisions intended to make it easier for unaccompanied homeless youth to apply for federal student financial aid using the Free Application for Federal Student Aid (“FAFSA”).¹ Specifically, at the urging of NAEHCY and other organizations, the 2007 Act expanded the definition of “independent student” to include youth who are verified as unaccompanied and homeless, or who are verified as unaccompanied, at risk of homelessness, and self-supporting. This change was intended to allow unaccompanied homeless youth, who frequently are not in contact with their parents and guardians, to apply for federal financial aid without parental or guardian signatures or financial information.

The Higher Education Opportunity Act of 2008, P.L. 110-315 (“2008 Act”) included provisions to assist homeless youth, and youth who are in or are coming from foster care by, among other things, making them automatically eligible for TRiO programs. The 2008 Act also required TRiO programs to identify and make services, including mentoring, tutoring, and other services, available to homeless children and youth, and children and youth in or coming from foster care.²

NAEHCY’s survey shows that the obstacles to federal student aid for unaccompanied homeless youth have been reduced, but that unreasonable documentation requirements, lack of understanding on the part of financial aid administrators, and distrust of and hostility toward unaccompanied homeless youth continue to prevent many unaccompanied homeless youth from applying for and obtaining federal financial aid. These conclusions have been confirmed, both anecdotally and statistically, by recent requests for assistance directed to NAEHCY’s Higher Education Helpline.³

¹ The FAFSA is the federal application form that students must complete to apply for virtually all types of federal financial aid. Essential terms are defined in the glossary following the conclusion.

² “The Federal TRiO Programs (TRiO) are Federal outreach and student services programs designed to identify and provide services for individuals from disadvantaged backgrounds. TRiO includes eight programs targeted to serve and assist low-income individuals, first-generation college students, and individuals with disabilities to progress through the academic pipeline from middle school to postbaccalaureate programs. . . . The recipients of [TRiO] grants, are institutions of higher education, public and private agencies and organizations including community-based organizations with experience in serving disadvantaged youth and secondary schools.” U.S. Department of Education, Office of Postsecondary Education (available at <http://www2.ed.gov/about/offices/list/ope/trio/index.html>).

³ Via a toll-free number and email, the NAEHCY Higher Education Helpline serves youth, educators, parents, financial aid offices, and others seeking guidance on higher education issues faced by students experiencing homelessness. Among those contacting the Helpline were admissions counselors (3 contacts), case managers (8 contacts), financial aid administrators (46 contacts), other higher education staff (42 contacts), high school counselors (17 contacts) school district liaisons (72 contacts), social service agencies and social workers (19 contacts), State Coordinators (29 contacts), parents (10 contacts), and students (133 contacts).

BACKGROUND

1. The National Association for the Education of Homeless Children and Youth

Each year, over one million children and youth experience homelessness in our nation. These students lack the stability and peace of mind that all children need and deserve. Homeless children and youth report that school is a home to them—a place where they see the same faces, sit in the same seat, and can put their hearts and minds into pursuits that ease their daily troubles. In academic settings, students gain the skills and support needed to avoid poverty and homelessness as adults.

NAEHCY is the only professional organization specifically dedicated to meeting the educational needs of children and youth experiencing homelessness. NAEHCY is a membership organization that includes local homeless education liaisons, educators, school counselors, social workers, registrars, nurses, child advocates, shelter staff, state and federal policy specialists, and partners from community-based and national non-profit organizations. Its members are on the front lines identifying, enrolling, and coordinating services for homeless children and youth whose lives have been disrupted by the lack of safe, permanent, and adequate housing. NAEHCY provides professional development, resources, and training support for anyone interested in supporting the academic success of children and youth challenged by homelessness. NAEHCY also engages in federal policy advocacy to strengthen policies and resources for homeless children, youth, and families.

2. Unaccompanied Homeless Youth

Unaccompanied homeless youth are young people who lack safe and stable housing, and who are not in the custody of a parent or guardian.⁴

Unaccompanied homeless youth may have run away from home or been forced to leave by their parents. They live in a variety of temporary situations, including in shelters, temporarily in the homes of other people, or in cars, campgrounds, public parks, abandoned buildings, motels, and bus or train stations. Generally, such youth leave home due to severe dysfunction in their families, including circumstances that put their safety and well-being at risk. Between 1.6 and 1.7 million youth run away from their homes each year.⁵

3. How the 2007 Act Assists Unaccompanied Homeless Youth in Obtaining Federal Financial Aid

Many unaccompanied youth recognize that postsecondary education is a critical stepping stone to a better life. These young people need federal student aid if they are to have any hope of access to postsecondary

⁴ The statutory definition of “homeless children and youth” in Subtitle VII-B of the McKinney-Vento Homeless Assistance Act, which addresses the Education of Homeless Children and Youth, refers to children and youth in a variety of living situations who “lack a fixed, regular, and adequate nighttime residence.” 42 U.S.C. §11434a(2)(A). The statute also defines “unaccompanied youth” to include “a youth not in the physical custody of a parent or guardian.” 42 U.S.C. §11434a(6).

⁵ Toro, P., Dworsky, A. and Fowler, P. (2007). “Homeless Youth in the United States: Recent Research Findings and Intervention Approaches.” *Toward Understanding Homelessness: The 2007 National Symposium on Homelessness Research*. Washington, DC: U.S. Dept. of Housing and Urban Development. The National Runaway Switchboard estimates that as many 2.8 million youth run away in a year. See <http://www.1800runaway.org/>

education. However, requirements associated with the FAFSA have precluded many such youth from qualifying for federal student aid.

The FAFSA is the federal application form that students must complete to apply for virtually all types of federal financial aid: Federal Pell Grants, Federal Work-Study, and Federal Direct Student Loans. State agencies and many colleges also use information from the FAFSA to determine eligibility for state and institutional aid. The FAFSA requires information concerning the student applicant's financial condition and resources. The kinds of data required vary depending on the status of the applicant.

Specifically, a student's dependency status determines whether the student must include his or her parents' financial information, rather than only his or her own financial information. As the U.S. Department of Education (ED) has explained, "If you're a **dependent student**, you will report your and your parents' information." "If you're an **independent student**, you will report your own information (and, if you are married, your spouse's)."⁶ Dependent students also must include a parental signature on the FAFSA.

These requirements make sense for most federal student aid applicants. But for unaccompanied homeless youth, these requirements created an insurmountable barrier, because such young people do not receive financial support from their parents, often do not have access to parental information, and often do not even have contact with their parents or guardians.

This lack of parental contact is not surprising. Studies of unaccompanied youth have found that 20 to 50% were sexually abused in their homes, and 40 to 60% were physically abused.⁷ Parental drug use or alcoholism and conflicts with stepparents or partners also prompt youth to run away from home.⁸ Many other young people are forced out of their homes by parents who disapprove of their sexual orientation or pregnancy.⁹ The severe dysfunction that leads many of these young people to leave home also makes it impossible for them to provide financial information or signatures from their parents or guardians for the FAFSA.

To remove the barriers posed by the FAFSA requirements for parental or guardian financial information and signatures, Congress included provisions in the 2007 Act that expanded the definition of "independent student" to include youth who are verified as unaccompanied and homeless during the school year in which they apply for aid (or who are verified as unaccompanied, at risk of homelessness, and self-supporting). Under the 2007 Act, any of the following may provide the required verification: (1) a McKinney Vento Act school

⁶ <http://studentaid.ed.gov/fafsa/filling-out/dependency>

⁷ Robertson, M. & Toro, P. (1998). "Homeless Youth: Research, Intervention, and Policy." *Practical Lessons: The 1998 National Symposium on Homeless Research*. Washington, DC: U.S. Dept. of Housing and Urban Development. See also MacLean, M.G., Embry, L.E. & Cauce, A.M. (1999). "Homeless Adolescents' Paths to Separation from Family: Comparison of Family Characteristics, Psychological Adjustment, and Victimization." *Journal of Community Psychology*, 27(2), 179-187.

⁸ Robertson & Toro (1998), *supra*.

⁹ The National Gay and Lesbian Task Force and the National Coalition for the Homeless (2007). *Lesbian, gay, bisexual and transgender youth: An epidemic of homelessness*. Washington DC: Authors. See also Toro, et al (2007), *supra*.

district liaison¹⁰; (2) a U.S. Department of Housing and Urban Development (HUD) homeless assistance program director or their designee; (3) a Runaway and Homeless Youth Act (RHYA) program director or their designee;¹¹ or (4) a financial aid administrator.

The addition of “unaccompanied homeless youth” to the definition of “independent student” has opened the doors of higher education to hundreds of thousands of unaccompanied homeless youth. In 2012-2013 alone, 58,158 students indicated a homeless circumstance of some kind on the FAFSA. This number, however, is not a definitive measure of the prevalence of homelessness among college students, since many college-age students still encounter barriers. Nor does the number provide an accurate estimate of the homeless youth who could benefit from financial aid since many homeless youth do not apply for postsecondary education because, even with reduced barriers to financial aid, they may feel it is beyond their reach.

4. How the 2008 Act Assists Unaccompanied Homeless Youth in Obtaining Access to Post-Secondary Education

The Higher Education Opportunity Act of 2008 also includes provisions to assist homeless youth, as well as youth in or coming from foster care. The 2008 Act makes homeless children and youth, and children and youth in or coming from foster care, automatically eligible for TRiO programs.¹² The 2008 Act also requires TRiO programs to identify and make available services—including mentoring, tutoring, and other services—to homeless children and youth, and to children and youth in or coming from foster care. In addition, the 2008 Act permits TRiO Student Support Services program to secure temporary housing during breaks in the academic year for homeless students and for students coming from foster care. The 2008 Act also includes as permissible services under the Federal TRiO programs and GEAR UP program activities specifically designed for homeless children and youth and for children and youth in or coming from foster care.¹³ In addition, the 2008 Act requires training programs under Staff Development Activities to include strategies for recruiting and serving homeless children and youth, as well as children and youth in or coming from foster care.

¹⁰ Under the McKinney-Vento Act homeless education provisions, every school district must designate a liaison for children and youth experiencing homelessness. See 42 U.S.C. §11432(g)(1)(J)(ii). Among other duties, liaisons ensure that (i) homeless children and youths are identified, enrolled, and given a full opportunity to succeed in school; (ii) homeless families, children and youths receive educational services for which they are eligible; and (iii) the parent or guardian of a homeless child or youth, and any unaccompanied youth, receives information about transportation services and is assisted in accessing transportation to school. See 42 U.S.C. §11432(g)(6)(A). Under the Family Educational Rights and Privacy Act, 20 U.S.C. §1232g, schools may disclose educational records for financial aid purposes without parental consent. See 20 U.S.C. §1232g(b)(1)(D); see also 34 C.F.R. §99.31(a)(4). This includes verifying that a youth is homeless and unaccompanied.

¹¹ The Runaway and Homeless Youth Act is codified at 42 U.S.C. §5701, *et seq.*

¹² For TRiO programs, see note 2, above, and the glossary.

¹³ GEAR UP (Gaining Early Awareness and Readiness for Undergraduate Programs) is a discretionary grant program that “is designed to increase the number of low-income students who are prepared to enter and succeed in postsecondary education. GEAR UP provides six-year grants to states and partnerships to provide services at high-poverty middle and high schools. GEAR UP grantees serve an entire cohort of students beginning no later than the seventh grade and follow the cohort through high school. GEAR UP funds are also used to provide college scholarships to low-income students.” U.S. Department of Education, <http://www2.ed.gov/programs/gearup/index.html>.

THE SURVEY

SURVEY QUESTIONS AND RESPONDENTS

The survey was conducted using SurveyMonkey®, a popular online survey tool. NAEHCY and the National Association of Student Financial Aid Administrators (NASFAA) publicized the survey through a variety of social media, encouraging subscribers, friends, followers, members, etc. to participate in the survey.

Just under half of the respondents are **public school**-related personnel, including State Coordinators for the Education of Homeless Children and Youth (2.1% of respondents), state education agency personnel (1.9%), school district homeless liaisons (26.7%), or other school district personnel (18.9%).

The next largest group of respondents (20.4%), work in higher education, many (14.6% of the respondents) in **financial aid** offices. These respondents' results are categorized under the **financial aid** responses.

A significant percentage of the respondents (19.2%) work in **college access** programs (such as TRiO, GEAR UP, or community college access organizations).

Finally, 10.8% of the respondents are **service providers**, working in youth services programs, shelters, or transitional living programs.

The survey sought information about the respondents' familiarity with financial aid policies applicable to unaccompanied homeless youth, experience in assisting unaccompanied homeless youth in accessing financial aid, experience with barriers to unaccompanied homeless youth obtaining financial aid, as well as the methods respondents have used to successfully assist unaccompanied homeless youth in obtaining financial aid, and the amount of collaboration between the respondents and local colleges and universities (in particular, the financial aid office).

SURVEY RESULTS AND RESPONSES

1. Familiarity with Policies Regarding Homeless Youth's Access to Financial Aid and Experience with Assisting Unaccompanied Homeless Youth in Obtaining Financial Aid

A very high percentage (over 80%) of the **public school** respondents who responded to the question indicated they are very or somewhat familiar with the policies concerning unaccompanied homeless youth's access to federal financial aid without a parental signature or parental income information. And close to 70% of the **public school** respondents answering the question indicated that they or their office had tried to help one or more unaccompanied homeless youth to access financial aid.

Almost as high a percentage of youth **service providers** indicated they are very or somewhat familiar with the policies, and 90% said they or someone in their office or agency had tried to help unaccompanied homeless youth access financial aid.

College access program respondents indicated somewhat less familiarity with the policies regarding homeless youth's access to financial aid without parental signatures or income information. 18.5% of the **college access** program respondents answering this question stated that they are very familiar with the policies, and 49.1%

indicated they are somewhat familiar with the policies. Another 22.5% said they had heard of the policies, but did not know any details about them or how they work, and close to ten percent said that the survey was the first they had heard of the policies. Nearly 74%, of the **college access** respondents indicated that they or someone in their office or agency had tried to help unaccompanied homeless youth access financial aid.

The college **financial aid** respondents reported that they have a high degree of familiarity with the policies. 57.5% of the **financial aid** respondents who answered the question indicated that they are very familiar with the policies, and over 40% indicated that they are somewhat familiar with them. 91% of those responding to the question indicated that they or someone in their office had attempted to assist an unaccompanied homeless youth in accessing financial aid. These rather striking results indicate the extent to which **financial aid** personnel are dealing with issues of unaccompanied homeless youth's access to financial aid, even if the responses provided by **other** respondents raise questions about how well financial aid offices are dealing with such issues and how knowledgeable financial aid office personnel really are about the policies.¹⁴

As for the reasons given for **not** assisting unaccompanied homeless youth in accessing financial aid, many **public school** respondents (41.6%) stated that no unaccompanied homeless youth had been identified.¹⁵ Similarly, the reason given by 71% of the **college access** respondents who reported that neither they nor anyone in their office had assisted homeless youth in obtaining financial aid was that no unaccompanied homeless youth had been identified. These responses reflect the reality that, even with the FAFSA reforms that reduced the barriers to financial aid for unaccompanied homeless youth, postsecondary education remains out of reach for many such young people. In addition, the failures to identify and assist homeless youth reported by many respondents may reflect the reluctance of such young people to reveal their homeless status.

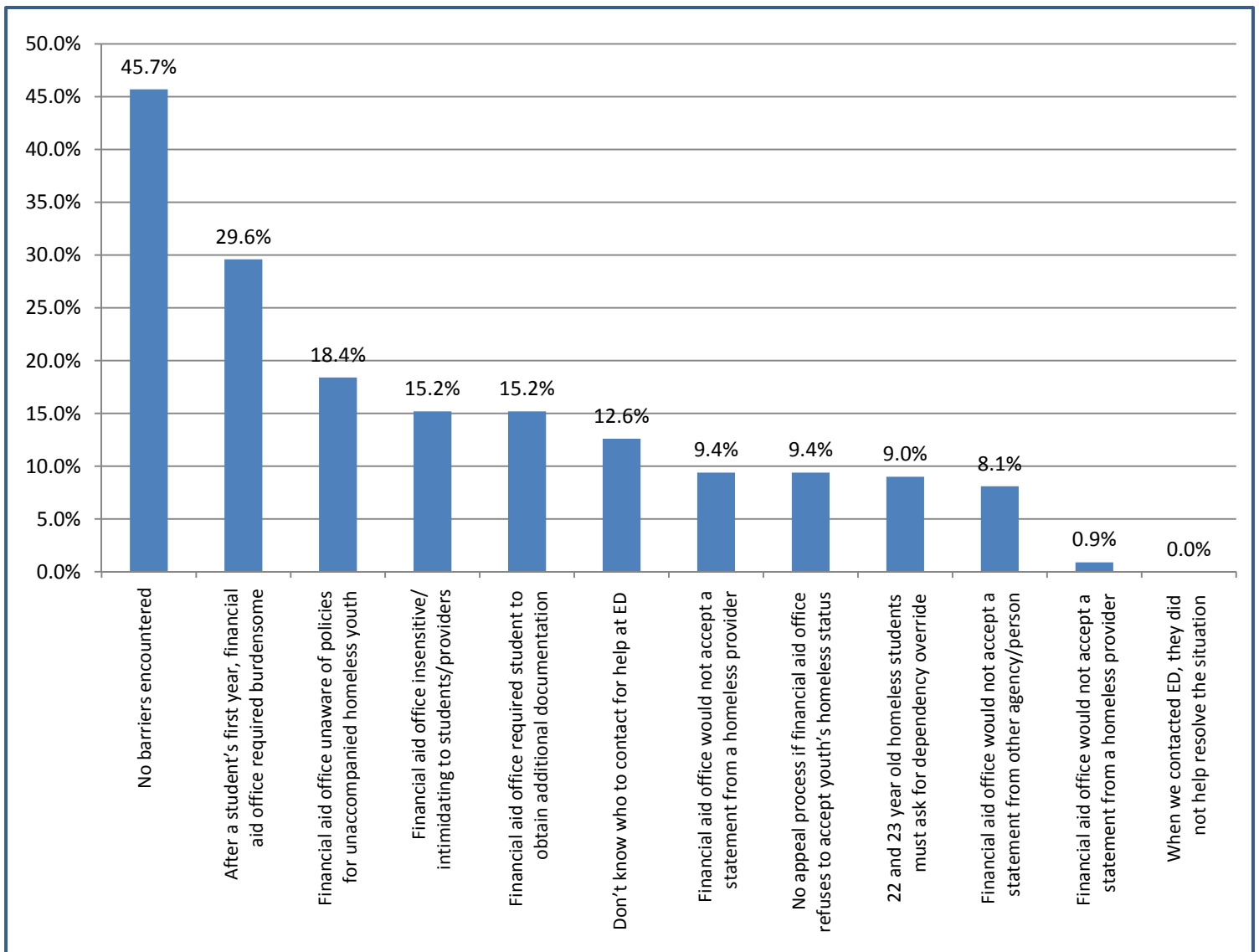
2. Barriers to Unaccompanied Homeless Youth Obtaining Access to Financial Aid

Not surprisingly, there were diverse views among the various groups of respondents concerning the most significant barriers to financial aid that unaccompanied homeless youth (and those who help them) face. Significantly, however, there also was a good deal of overlap among many of the respondents with regard to the problems facing unaccompanied homeless youth who are seeking access to federal financial aid. The graphs below summarize the results of NAEHCY's survey, which we discuss in detail below.

¹⁴ As discussed below, strikingly high percentages of **public school**, **service provider**, and **college access** respondents reported that financial aid office **lack** of awareness of policies for unaccompanied homeless youth is a significant barrier to unaccompanied homeless youth's access to financial aid.

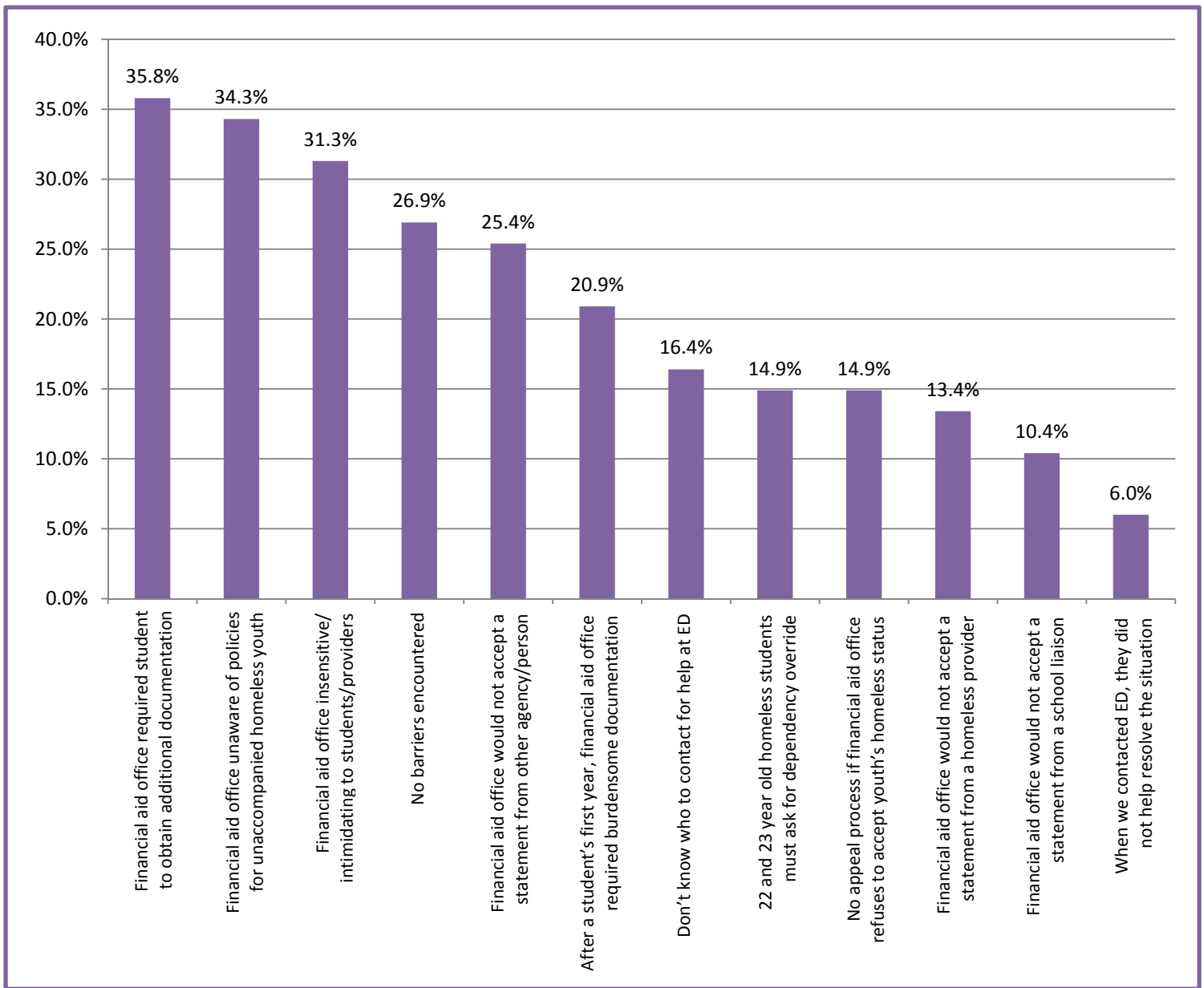
¹⁵ A substantial percentage (31.4%) of the **public school** respondents indicated that no unaccompanied homeless youth had applied to college yet, but that some are closing to doing so. Some **public school** respondents (22.6%) cited a lack of college readiness on the part unaccompanied homeless youth. **Public school** respondents also cited lack of time (5.1%) or lack of training (13.9%) for assisting unaccompanied youth.

Figure 1: Barriers Reported by Public School Respondents



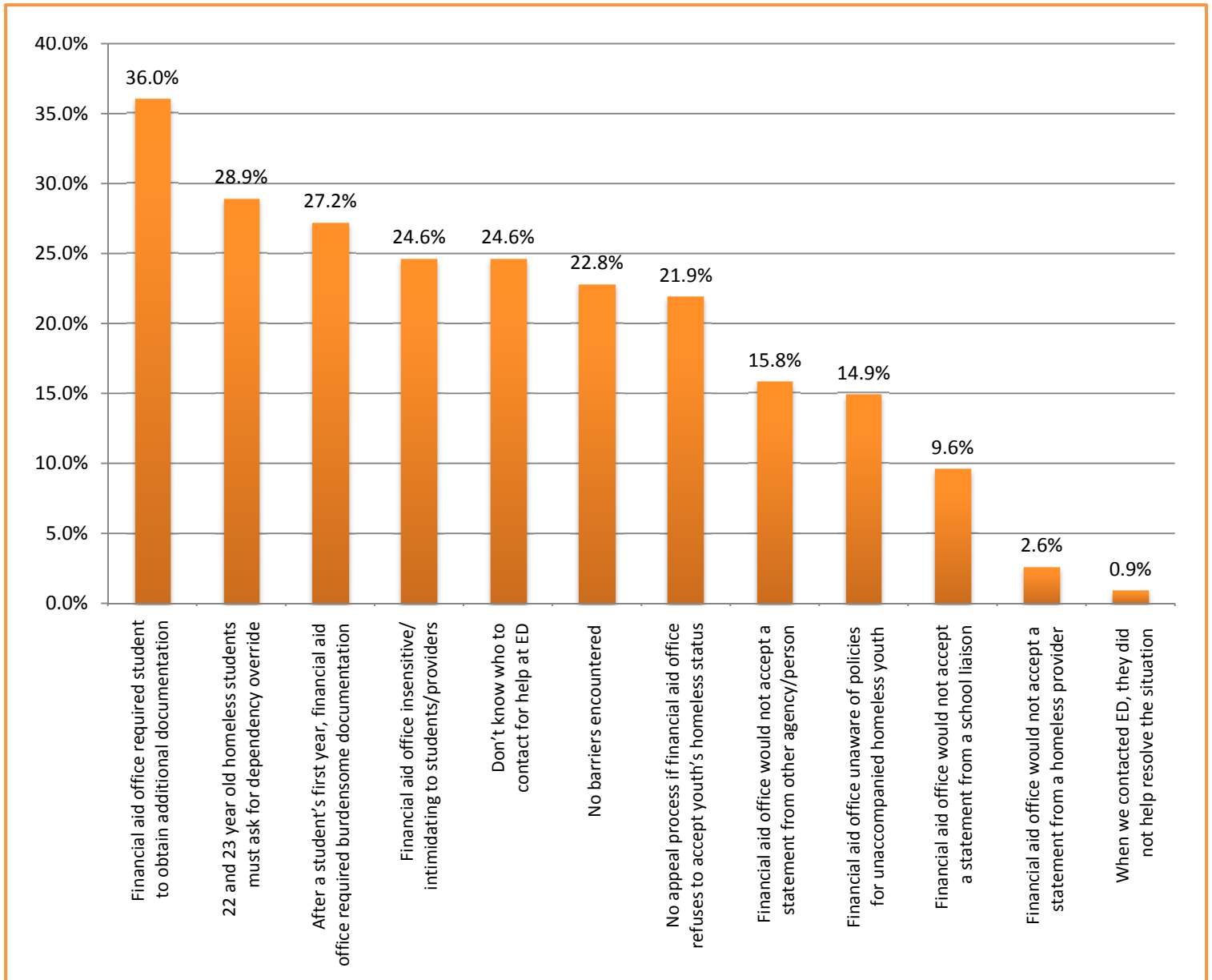
No barriers encountered	45.7%
After a student's first year, financial aid office required burdensome documentation	29.6%
Financial aid office unaware of policies for unaccompanied homeless youth	18.4%
Financial aid office insensitive/intimidating to students/providers	15.2%
Financial aid office required student to obtain additional documentation	15.2%
Don't know who to contact for help at ED	12.6%
Financial aid office would not accept a statement from a school liaison	9.4%
No appeal process if financial aid office refuses to accept youth's homeless status	9.4%
22 and 23 year old homeless students must ask for dependency override	9.0%
Financial aid office would not accept a statement from other agency/person	8.1%
Financial aid office would not accept a statement from a homeless provider	0.9%
When we contacted ED, they did not help resolve the situation	0.0%

Figure 2: Barriers Reported by Service Provider Respondents



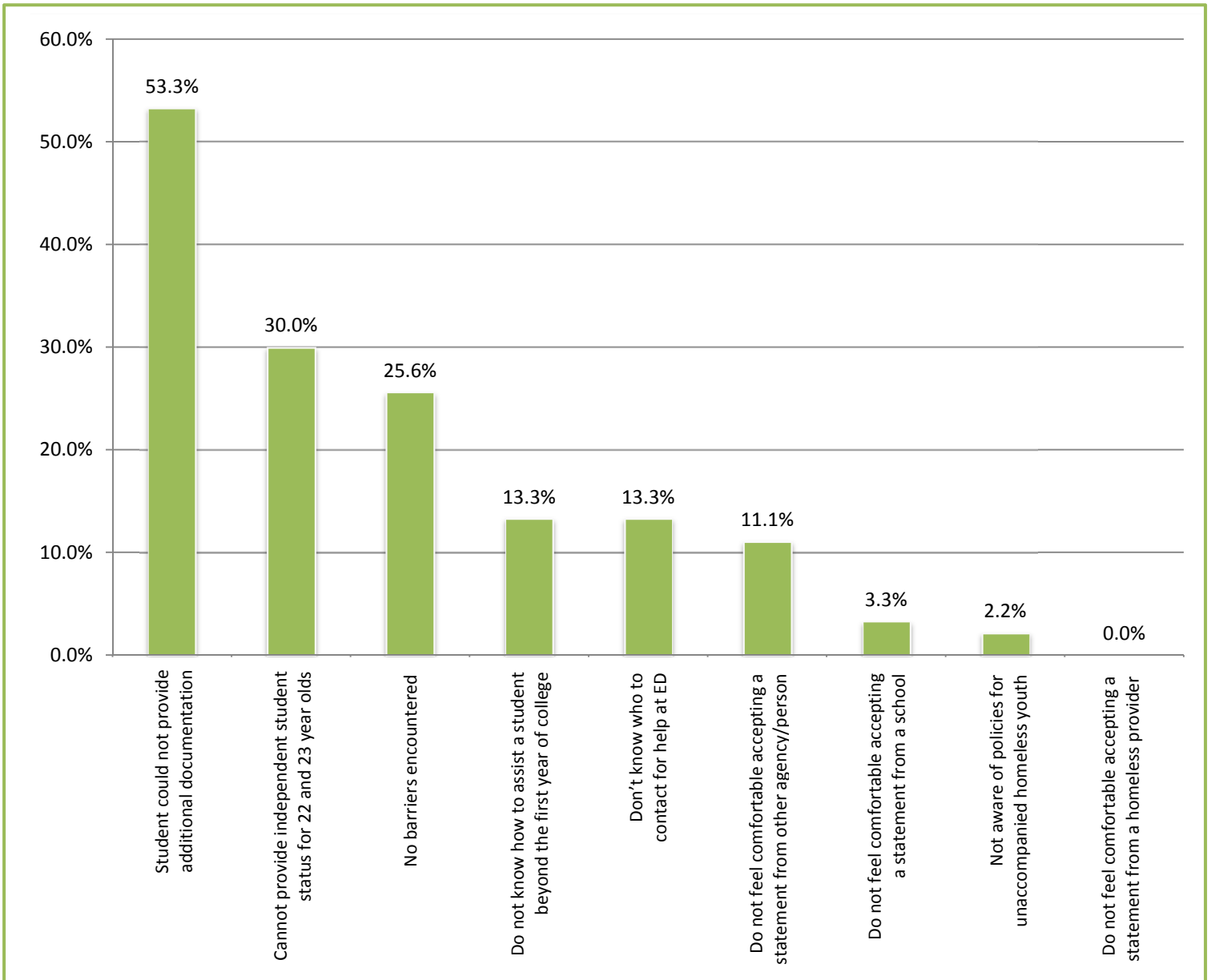
Financial aid office required student to obtain additional documentation	35.8%
Financial aid office unaware of policies for unaccompanied homeless youth	34.3%
Financial aid office insensitive/intimidating to students/providers	31.3%
No barriers encountered	26.9%
Financial aid office would not accept a statement from other agency/person	25.4%
After a student's first year, financial aid office required burdensome documentation	20.9%
Don't know who to contact for help at ED	16.4%
22 and 23 year old homeless students must ask for dependency override	14.9%
No appeal process if financial aid office refuses to accept youth's homeless status	14.9%
Financial aid office would not accept a statement from a homeless provider	13.4%
Financial aid office would not accept a statement from a school liaison	10.4%
When we contacted ED, they did not help resolve the situation	6.0%

Figure 3: Barriers Reported by College Access Respondents



Financial aid office required student to obtain additional documentation	36.0%
22 and 23 year old homeless students must ask for dependency override	28.9%
After a student's first year, financial aid office required burdensome documentation	27.2%
Financial aid office insensitive/intimidating to students/providers	24.6%
Don't know who to contact for help at ED	24.6%
No barriers encountered	22.8%
No appeal process if financial aid office refuses to accept youth's homeless status	21.9%
Financial aid office would not accept a statement from other agency/person	15.8%
Financial aid office unaware of policies for unaccompanied homeless youth	14.9%
Financial aid office would not accept a statement from a school liaison	9.6%
Financial aid office would not accept a statement from a homeless provider	2.6%
When we contacted ED, they did not help resolve the situation	0.9%

Figure 4: Barriers Reported by Financial Aid Respondents



Student could not provide additional documentation	53.3%
Cannot provide independent student status for 22 and 23 year olds	30.0%
No barriers encountered	25.6%
Do not know how to assist a student beyond the first year of college	13.3%
Don't know who to contact for help at ED	13.3%
Do not feel comfortable accepting a statement from other agency/person	11.1%
Do not feel comfortable accepting a statement from a school	3.3%
Not aware of policies for unaccompanied homeless youth	2.2%
Do not feel comfortable accepting a statement from a homeless provider	0.0%

a. Yearly Re-Determination

Of the respondents who said that they or someone in their office had attempted to assist homeless youth with financial aid issues, the majority reported encountering one or more barriers to financial aid. Documentation requirements figured prominently among these barriers.

By far the most cited documentation barrier reported by the *public school* respondents was the annual redetermination requirement. A significant number of *college access and service provider* respondents also cited this requirement as a barrier. See Figures 1-3, above.

Under current law, in order to be considered independent, a youth must be determined to be homeless and unaccompanied *in the year in which he or she is submitting the FAFSA*. This means that *each year* that the student applies for financial aid, the student must have a determination he or she is an unaccompanied homeless youth.

This requirement creates significant problems for students who have already started postsecondary education, because school liaisons, HUD-funded shelters, and RHYA programs cannot make determinations for young people who have left their programs and shelters. As one *public school* respondent explained, “Students continue to need verification of homeless status in subsequent college years, which school district liaisons really cannot provide when they are no longer actively involved with the college students.” The same problem was described by a *service provider* respondent who complained that the “[d]ocumentation required for youth needed to be dated after youth left the program. Youth has been ‘couch-hopping’ since and was not agency involved in the time frame requested.”

The yearly determination requirement is a source of a great deal of stress and trauma because it forces unaccompanied homeless youth to take time away from their studies to track down documentation, contact people with whom they may no longer be in touch, and re-disclose painful information about their status. Thus, a *financial aid* respondent pointed to problems with “recurrent documentation of homelessness. We are good with right out of high school but as they age we require documentation of continued homelessness.” And another *financial aid* respondent expressed frustration that “[t]he FAFSA questions specifically address the prior year, when a student no longer has contact with that entity after their freshman year!!!”

Significant numbers of contacts with the NAEHCY Higher Education Helpline have been prompted by the yearly determination requirement, and the students contacting the Helpline provide compelling evidence of the anxiety, frustration, and pain caused by the requirement. For instance:

- A student attending a four-year public university in Virginia needed the financial aid office to make a subsequent year determination of his unaccompanied homeless youth status. The previous year, the student had received the determination from his high school homeless education liaison. A financial aid officer instructed the student to get documentation of his unaccompanied homeless youth status from the high school. The high school, however, could not make the determination for the student since the student was already in college, and determinations must be based on current information. Ultimately, the student was able to obtain a determination from the financial aid office, but only after delays and frustration.
- A student attending a community college in Washington State needed a subsequent year determination of her unaccompanied homeless youth status. The student had previously received a determination of her unaccompanied homeless youth status from her school district. The NAEHCY Higher Education Helpline

informed the student that financial aid administrators can make a determination of an unaccompanied homeless youth status by doing a documented interview. The school indicated that it would accept a written statement from the student that detailed her unaccompanied homeless youth status, **but** that she would also need to obtain letters from everyone with whom she resided while she was homeless. This entire episode reflected the financial aid office's lack of awareness of the law, and ultimately resulted in unnecessary difficulty for the student, who experienced a delay in receiving her financial as a result.

- A school district liaison from Indiana contacted the NAEHCY Helpline after two of her former students, one attending an Indiana university and one attending a Kentucky university, were informed that they would need to follow-up with their liaison in order to get documentation of their unaccompanied homeless youth status for subsequent year determinations. The liaison could not make determinations of the students' unaccompanied homeless youth status since they were no longer in high school. Ultimately, the State Coordinator of Indiana and the district liaison were able to work together to assist the students, but the yearly determination requirement (and the financial aid offices' lack of awareness of the documentation requirements) created unnecessary burdens and anxiety for the students.
- An unaccompanied homeless youth who was home schooled throughout high school contacted the helpline in order to get assistance with getting a determination of her unaccompanied homeless youth status. The student has been homeless, and estranged from her family for some time. The student submitted the NAEHCY determination template for Financial Aid Administrators to the director of financial aid at her college.¹⁶ The director indicated that he was unfamiliar with the template, and that each school was able to decide how they wanted to handle unaccompanied homeless youth. He informed the student that she needed to write a personal statement and get a statement from a counselor, or consenting adult before he could make the determination of her homeless status.

b. Financial Aid Office Demands for Additional Documents

In their responses to the survey, both **service provider** and **college access** respondents cited as the number one barrier to federal financial aid for unaccompanied homeless youth requirements for additional documentation imposed by financial aid offices. This barrier also was cited by 15.4% of the **public school** respondents. Many of the documentation demands made by financial aid offices are **not** mandated by existing law. One **service provider** wrote, "After providing a letter regarding the student's residence at a transitional living program, the student was still told her mother's information was required."¹⁷

Such demands often reflect confusion about applicable legal requirements, and, in some cases, hostility and suspicion toward unaccompanied homeless youth. In fact, financial aid offices' lack of awareness about financial aid policies for unaccompanied homeless youth was the second most cited barrier to financial aid for unaccompanied homeless in the responses by **service provider** respondents who identified such barriers, with 34.3% of those respondents identifying it as a barrier. 18.4% of **public school** respondents also cited financial aid office lack of awareness as a barrier. This is strikingly at odds with the self-assessments of many of the **financial aid** respondents, who, as noted above, reported a high degree of familiarity with relevant policies.

¹⁶ The NAEHCY template identifies which professional has made the determination a student meets the definition of an unaccompanied youth and the academic year to which the determination applies.

¹⁷ This respondent also noted that when the student later "returned to the university to discuss the issue, another person told her she did not have to provide that information. Very frustrating!"

Thus, as one *public school* respondent wrote, “Financial aid office staff seemed confused about law and what they needed or could accept for documentation.” Another alluded to financial aid offices’ “[g]eneral lack of knowledge regarding financial aid for homeless unaccompanied youth.”

Contacts with NAEHCY’s Higher Education Helpline confirm that such confusions are widespread. In fact, confusion and questions about how to determine independent student status are by far the largest sources of contacts with the hotline. As shown in Figure 5 (below), close to 30 percent of contacts with the Helpline are generated by questions about determining independent student status.

Figure 5: Numbers of Helpline Contacts by Subject.

Count Subject	Account Type		Grand Total
	-	Prospect	
Call	4	1	5
College Cost Reduction and Access Act	1	0	1
Dependency Override	7	0	7
Determining Independent Student Status	131	0	131
FAFSA Completion for homeless student (not unaccompanied)	25	0	25
FAFSA Completion for unaccompanied homeless student	33	0	33
Foster Care Youth	10	0	10
Higher Education Access	24	0	24
Higher Education Fee Waivers	27	0	27
Loans/Grants	11	0	11
NAEHCY LeTendre Scholarship	14	0	14
NAEHCY Resources	35	0	35
NAEHCY Statewide Network	24	0	24
Other	8	1	9
Referral	36	0	36
Shelter/Transitional Living Housing	12	0	12
Subsequent Year Determination	2	0	2
TRIO/GEAR UP	2	0	2
Undocumented Youth	5	0	5
Ward of the Court	3	0	3
Grand Total	454	2	456

These confusions about documentation requirements and the resulting unnecessary requests for additional documentation, also are evident in the Helpline contacts recounted at pages 12-13, above.

Some of the confusion stems from unfamiliarity with the definition of “homeless children and youth” under the law. As described in footnote 4, above, children and youth are “homeless” for purposes of federal financial aid when they “lack a fixed, regular, and adequate night time residence.”¹⁸ Homeless situations include “sharing the housing of other persons due to loss of housing, economic hardship, or similar reason; . . . living in motels, hotels, trailer parks, or camping grounds due to lack of alternative adequate accommodations” and other situations that are frequently associated with being homeless, such as living in homeless shelters, parks, and cars.¹⁹

All too often, financial aid office personnel fail to understand that a youth who is “couch surfing” at various acquaintances’ residences or doubling up with relatives *is* homeless under the law. Thus, one **public school** respondent stated, “It is more difficult when a student is in a doubled up situation to get the financial aid....most of our students in our community double up with relatives or friends etc [because] youth shelters are always at capacity.” And a **college access** respondent complained, “We have students who are essentially homeless but because they’re not in a shelter, they don’t have paperwork to get verification (ex. dad passed away and mom hasn’t been involved for years and [mom] lives with family in a house that has no room for student, but student is attached to mom on the FAFSA).”²⁰

The responses of some of the **financial aid** respondents themselves reflect the confusion and erroneous assumptions referred to by other respondents. For instance, one such respondent stated, “What we encounter is students that self-identify themselves as ‘homeless’ but have never been declared homeless by a school or homeless shelter but probably should have been. It’s often a struggle for them to obtain enough documentation to successfully complete a Dependency Override.” This response reflects several misconceptions.

¹⁸ 42 U.S.C. §11434a(2)(A). The cited provision is from Section 725 of the McKinney-Vento Homeless Assistance Act, as amended by the McKinney-Vento Homeless Assistance Improvement Act of 2001, P.L. 107-110, at 115 Stat. 2006. The Higher Education Assistance Act cross-references the McKinney-Vento definition. See 20 U.S.C. §1087vv(d)(1)(H).

¹⁹ 42 U.S.C. §11434a(2)(B).

²⁰ Unfortunately, college financial aid personnel are not the only ones who do not know how to determine that a youth is homeless or how to guide a youth who is homeless. A number of respondents pointed to similar problems with high school personnel. One **college access** respondent stated, “The school counselors do not seem to understand who qualifies under this act. Multiple, eligible students are not identified in high school, and it is much more difficult to establish this status at the college-level.” Another complained, “I work for a college access organization but am placed in a school and learned that absolutely none of the guidance counselors are familiar with ways to help unaccompanied homeless youth.”

First, assuming that the youth is less than 22 years old, and the youth has not been certified as unaccompanied and homeless by another statutorily-recognized authority, the financial aid office must make the determination itself without recourse to the onerous “dependency override” process.²¹

Second, the documentation required for the financial aid officer’s determination that a youth is homeless is not extensive and need not be sought from outside sources. As ED’s Application and Verification Guide (“AVG”) explains, “The determination may be based on a documented interview with the student if there is no written documentation available.”²² The AVG helpfully lists resources that the financial aid office can use in making a determination of homelessness, including asking for help from local school district liaisons, state homeless education coordinators, the National Center for Homeless Education, homeless shelters, college access programs like TRiO and GEAR UP, mental health professionals, and others. But recourse to these resources is not required. Rather, in order to make the determination that the financial aid office is *required* to make, a documented interview with the youth him- or herself is all that is necessary.²³ Thus, the financial aid administrators did not need to demand third-party documentation from the students whose difficulties with re-verification were summarized at page 12-13, and need not do so when students first apply for federal financial aid, but have not been certified as unaccompanied and homeless by a school district liaison, or HUD or RYHA program director or designee.

An equal if not greater concern is the practice of ignoring information from the resources that the AVG recommends for consultation. Thus, one *college access* respondent noted, “We were under the belief that we as TRiO staff could write a statement on behalf of a student, knowing her homeless situation. Financial Aid refused to accept our statement as proof and required her to track down documentation from a shelter. The [financial aid] office here is extremely insensitive to our students and the situations they live in.”

Other responses from *financial aid* respondents similarly reflect confusions and, perhaps, hostility toward homeless youth and the law itself. Thus, a *financial aid* respondent wrote, “We do ask for a minimal amount of 3rd party documentation of the student’s status to weed out the students who have heard they do not have to provide parental income /assets if they say they are homeless.”

²¹ “Dependency override” refers to the “documented determination of independence by reason of other unusual circumstances” that financial aid administrators may make under Section 480 of the Higher Education Act (20 U.S.C. §1087vv(d)(1)(I)). Because status as an unaccompanied homeless youth is expressly included as a condition for independent status, a dependency override is *not* the rubric for determining that a young person who meets the statutory definition of a homeless unaccompanied youth is an independent student under the law. The ED’s 2013-2014 Application and Verification Guide (also referred to as the “AVG”) (available at <http://ifap.ed.gov/fsahandbook/attachments/1314AVG.pdf>) makes this abundantly clear. See page AVG-119, which states, “A determination of being homeless is not a dependency override or a case of professional judgment.” The FAFSA itself may be responsible for this confusion, however, because it requires Federal Aid Administrators to enter their determination that a youth is unaccompanied and homeless under an option (option #4) in the dependency override field in the FAA Access to CPS Online or in “Overrides” section of the paper FAFSA. *Id.* at AVG-120.

With regard to the age limitation mentioned in the text above, see the discussion below at pages 18 to 19.

²² *Id.* at AVG-119.

²³ *Id.* The AVG makes it clear that the determination whether a youth is homeless must be made if a youth presents herself as homeless: “If a student does not have, and cannot get, documentation from any of the authorities given on page 23, you **must** determine if she is an unaccompanied youth who is homeless or is self-supporting and at risk of being homeless.” *Id.*

Such third-party documentation and additional inquiries are **not** required when the youth's status has been determined by a McKinney Vento Act school district liaison, a HUD homeless assistance program director or their designee, or a Runaway and Homeless Youth Act program director or their designee, and, as noted above, third-party documentation is not required for the financial aid office to make the required determination. In fact, the demand for third-party documentation to “weed out” applicants is contrary to the spirit of the law and to ED guidance.

As reflected in the survey responses (and evidenced by many contacts with the NAEHCY Helpline), such demands are a frequent source of frustration for those who seek to assist unaccompanied homeless youth, and they create unnecessary anxiety for the students themselves. For instance, a **college access** respondent stated, “It depends on the college, I work in a youth development center that also has a drop in [Runaway and Homeless Youth] clinic. We get many youth who are ‘couch surfing’ or homeless after enrolling in college. Afterwards the financial aid office is unwilling or creates their own rules on how to determine an unaccompanied youth. For example: We had one youth who is couch surfing & the college insisted they provide a bank statement showing they have a balance of \$11K even though they are couch surfing and have no income.” Another **college access** respondent reported, “We had to track parent down to get a copy of the parent’s income tax information.”

c. Refusal of Financial Aid Administrators to Make the Required Determination

Although school district liaisons and homeless service providers are very capable of confirming the status of unaccompanied homeless youth, many youth remain unidentified as unaccompanied and homeless by these professionals. Such youth may not have been verified for a variety of reasons. For one thing, a young person may have become homeless *after* high school. In addition, school personnel may not discover that a youth is unaccompanied and homeless because many youth try to keep their status a secret in order to protect their families or siblings who remain with their parents, or to avoid Child Protective Services and the foster care system.

Many such unaccompanied homeless youth also are not identified by homeless service providers because such youth often do not stay in shelters, either because of shortages of shelter beds (a problem nationwide) or because of fears about the safety of shelter facilities. As a result, many unaccompanied homeless youth do not have contacts with homeless service providers.

In such instances—that is, when a youth presents him- or herself as an unaccompanied homeless youth and does not have a determination from a McKinney Vento Act school district liaison, a HUD homeless assistance program director or their designee, or a Runaway and Homeless Youth Act program director or their designee—the financial aid administrator is **required** to make a determination whether the youth is unaccompanied and homeless.

As noted above (*see note 23*), this requirement is clearly explained in the AVG. A number of survey respondents, however, reported instances in which financial aid administrators have refused or failed to make determinations.

One **public school** respondent cited a “student under 22 [who was] entering two year colleges told to do a dependency override by director of financial aid even though student was still homeless. No one at Community college to verify student as unaccompanied youth.” Another complained, “Sometimes youth were

not identified as homeless while still in high school but the financial aid officers still want me to verify rather than doing it themselves.” And a **service provider** respondent wrote, “Financial Aid staff refuse to verify youth that do not have access to verification from [McKinney Vento school] liaison, [Runaway and Homeless Youth Act] program or HUD shelter, although the [Department of Education] AVG states that they are to do exactly that.” Similarly, a **college access** respondent complained, “Students do not necessarily have formal documentation or a professional that can write a letter explaining the student’s situation because their homelessness was not officially documented despite the fact that it occurred. No documentation, no independent student status.”

Contacts with the NAEHCY Higher Education Helpline confirm the persistence of this problem. Refusals or reluctance to make the required determination are evident in a number of summaries of student contacts on pages 12-13. Other examples will be discussed in subsection g, below.

d. Age-Restrictive Definition of “Youth” that Requires 22- and 23-Year-Olds to Seek a “Dependency Override”

For reasons that are unclear, the U.S. Department of Education’s AVG defines “youth” as “a student who is 21 years old or younger or still enrolled in high school as of the date he signs the application.”²⁴ This age restriction, **which is not mandated by any statute**, creates a significant barrier to financial aid for many unaccompanied homeless youth who are 22 or 23 years old.²⁵

Because of the Department of Education’s restrictive definition of “youth,” 22- and 23-old unaccompanied homeless students can obtain independent status for federal financial aid purposes only if they obtain a “dependency override.” As noted in footnote 21, above, a dependency override is a “documented determination of independence by reason of other unusual circumstances.”

The dependency override process requires case-by-case assessments that are supported by documentation of the unusual circumstances facing the student that support an override. According to guidance issued by the ED in a 2011 Dear Colleague letter, GEN -11-15, “Documentation is a critical aspect of the dependency override process. The document must include the reason for the determination and must support the decision. **In almost all cases, the documentation should originate from a third party with knowledge of the unusual circumstances of the student.** The third party confirming the student’s unusual circumstances could include: counselors or teachers, clergy, community groups, government agencies, medical personnel, courts, or prison administrators. **In rare circumstances**, where third party confirmation cannot be obtained, the financial aid administrator may – **but is not required to** – accept a signed statement from the student alone, or the student and his or her relatives or friends; **however, the use of this form of documentation may occur only in extremely rare circumstances.**”²⁶

²⁴ AVG-119.

²⁵ Students who are age 24 and over are independent under the Higher Education Act. See 20 U.S.C. §1087vv(d)(1)(A). See 20 U.S.C. §1087vv(d)(1)(A). Independent status is accorded to other categories of students, including veterans, those in graduate or professional school, and those with legal dependents other than a spouse. See 20 U.S.C. §1087vv(d)(1)(D), (E), & (G). The number of 22- and 23-year old unaccompanied homeless youth who have independent status on the basis of these categories is unclear, but almost certainly modest.

²⁶ U.S. Department of Education Dear Colleague Letter GEN-11-15 (emphasis added) (available at <http://ifap.ed.gov/dpclatters/GEN1115.html>).

It can be extremely difficult for youth to obtain documentation of their status from the types of entities listed in ED's Dear Colleague letter once they start college. As one **financial aid** respondent noted, "Students are living in encampments and cannot get any statements from anyone other than other students or others in the encampment. They do not have relationships with any other persons who can do the [statement] for them." Yet, it is only in "extremely rare circumstances" that financial aid administrators can dispense with such third-party documentation, and even in such circumstances, they have little incentive to do so.²⁷

Although ED's AVG specifically refers to unaccompanied homeless 22- and 23-year-olds as meriting an override, the AVG goes on to reiterate that "[d]ocumentation is critical to the dependency override process" and "should in almost all cases originate from a third party with knowledge of the unusual circumstances of the student"; acceptance of a statement from the student or a family member "should be a last resort."²⁸

It is clear from both the survey respondents and NAEHCY's experience that the exclusion of unaccompanied homeless 22- and 23-year-olds from the definition of "youth" poses a significant barrier to higher education for such young people. Too old to qualify as unaccompanied homeless **youth**, yet too young to qualify as independent students under the provision defining "independent student" as someone 24 years of age or older, unaccompanied homeless 22- and 23-year-olds must pass through the gauntlet of a dependency override process that, in practice, forecloses many of them from obtaining federal financial aid. No wonder then that ED's restrictive definition of "youth" was the second most cited barrier to financial aid identified by the **college access** respondents and **financial aid** respondents.²⁹ Significant percentages of the **service provider** respondents (14.9%) and **public school** respondents (9%) also identified this barrier.

e. Restrictions on the Types of Shelters that Can Verify Youth as Unaccompanied and Homeless

Under the 2007 Act, only HUD-funded and Runaway and Youth Act-funded shelters can verify a youth's unaccompanied, homeless status. A number of respondents criticized this restriction. One **college access** respondent complained of the barriers facing "students not having access to someone to complete a certifying letter because the shelter was not HUD shelter or student was no longer in high school." And a **service provider** respondent noted that "Financial Aid staff refuse to verify youth that do not have access to verification from MV liaison, RHYA program or HUD shelter, although the AVG states that they are to do exactly that."

The limitation on the shelters that may confirm a youth's status as unaccompanied and homeless has, in NAEHCY's experience, been quite problematic. For one thing, many shelters do not receive federal funding. Such shelters nevertheless provide important services to homeless youth, and their administrators may be uniquely well positioned to confirm a young person's status. Yet, the 2007 Act arbitrarily prevents such shelters from verifying youth as homeless and unaccompanied. In addition, neither youth nor financial aid administrators are likely to know the nature of the funding of the shelters in the area.

²⁷ The emphasis in Federal monitoring of financial aid office activities is on auditing **grants** of aid. As a result, a wrongful denial of a dependency override is highly unlikely to result in any negative consequences for the financial aid office. Thus, financial aid administrators have little incentive to grant dependency overrides.

²⁸ Department of Education AVG at AVG-116.

²⁹ This barrier appeared in the responses of 28.9% of the **college access** respondents and 30% of the **financial aid** respondents who identified barriers in the survey.

As a result, the funding designation for verifying youth as homeless and unaccompanied creates confusion and unnecessarily limits certification by legitimate shelter providers.

f. Absence or Abuse of Appeals Processes by Financial Aid Offices

Numerous respondents complained that there was no appeal process if a financial aid office refused to accept a youth's homeless status. 21.9% of the **college access** respondents, 14.9% of the **service provider** respondents, and 9.4% of the **public school** respondents identified the lack of an appeals process as a barrier of which they were aware.³⁰

In addition, when appellate procedures are available, those procedures can be quite confusing. As one **service provider** respondent noted, "Appeal processes are not clear. There seems to be no requirement on the part of the institution to inform youth that they have the right to appeal or what that process looks like. Also, policies and practices are inconsistent among institutions. This makes it difficult to effectively advocate because each school has their own rules and process."

Some financial aid offices also appear to be abusing the application process by arbitrarily rejecting applications and forcing unaccompanied homeless youth to undertake lengthy and difficult appeals. Thus, one **service provider** respondent wrote about a student who "was not deemed eligible for independent status after filling out FAFSA and indicating they reside or resided in federally funded TLP for homeless youth. Student had to appeal and financial aid office required several support letters from our agency and others. Ultimately indep. status was granted (not easily)."

Since conducting the survey, NAEHCY has received confirmation that at least some universities have adopted a strategy of virtually always initially rejecting claims of homeless status. For instance, an unaccompanied homeless youth at Bushland Independent School District applied to and has been accepted at Texas A&M University. The student completed the FAFSA and the high school counselor called Texas A&M just to verify how the financial aid process worked for unaccompanied homeless youth. The financial aid office informed her that the student would receive a Rejection Letter, indicating that he would not be eligible for financial aid. The letter would also include information as to the appeal process for this determination. The Bushland district Assistant Superintendent called the university and was told that, at Texas A&M, any FAFSA with the homeless questions checked off is rejected. The appeals process is how they "get to the bottom" of each situation and verify homeless status.

Other schools similarly appear to be using the appeals process as a screening tool for "doubtful" cases. Thus, a student contacted NAEHCY for assistance because the financial aid advisor at the University of California, Santa Cruz, rejected the form he had from the homeless youth shelter, calling it "weak evidence." The shelter had interviewed the young man, and declared him homeless, but the shelter was full, so he could not stay there. The Financial Aid Administrator insisted that the student go through the appeals process and provide more details about the nature of his situation.

³⁰ The 2013-2014 AVG indicates that a student may appeal a financial aid administrator's decision not to make a determination to ED. However, to date the Department has not established a process for this appeal.

g. Financial Aid Office Insensitivity and Hostility

A recurring theme among the respondents—except, of course, the *financial aid* respondents—concerns the barriers to financial aid created by the insensitivity and hostility of financial aid offices toward unaccompanied homeless youth. 31.3% of *service provider* respondents, 24.6% of *college access* respondents, and 15.2% of *public school* respondents identified financial aid office insensitivity or intimidation as a barrier that they have encountered in assisting unaccompanied homeless youth in obtaining financial aid.

These attitudes are reflected in the frequently cited unwillingness of financial aid administrators to make the legally required determination of homeless status in the absence of a determination by one of the other authorities identified in the 2007 Act or even to accept determinations that have been provided by a statutorily authorized entity. *Service provider* respondents wrote of financial aid offices requiring “all these documents [as] proof of being homeless but the youth do not get provided with . . . additional financial aid” and “[n]ow requiring IRS letters even if the student didn’t file taxes.” Another such respondent listed numerous such complaints: “Financial aid not taking time to go over the FAFSA with the student. Financial aid not processing because of limited computer access and where they mail letters these youth do not have that. The Financial Aid office calling to verify the letter and if they are still in that same situation. Financial aid not explaining the definition of homeless when it asks that question on the FAFSA. [Financial aid office not] understanding the mind of these youth.”

One *public school* respondent stated, “I’m not sure if ‘insensitive’ or ‘intimidating’ are the right words,” but then went on to note, “Financial aid staff asked very personal probing questions, trying to verify the student’s homeless status, and upset one student greatly - when none of the questions were necessary, since the student had a district form verifying their status.” Another such respondent reported, “The college just gave the student the paperwork and no instructions. Their attitude was if you want this bad enough, you will get it filled out. If the counselor [at the high school] had not been on top of things our student would have missed out.” And a *college access* respondent observed, “Financial aid personnel did not seem adequately trained to handle a sensitive issue such as this.”

The insensitivity or hostility cited by survey respondents also has been reported by callers to the NAEHCY Higher Education Helpline. The demands for additional documentation and reluctance to make unaccompanied homeless determinations described on pages 12-13, above, reflect such insensitivity and hostility, as do the following additional examples:

- An unaccompanied homeless youth attending a public university in Montana needed the financial aid office to make a subsequent year determination of his unaccompanied homeless youth status. The student graduated from high school in 2012 and has not had contact with high school officials since receiving the determination of his unaccompanied homeless youth status. The Director of Financial Aid informed the student that he would need to get documentation from his school district or a shelter in order for them to make a determination of the student’s unaccompanied homeless youth status. The Director has been unresponsive to communications from NAEHCY, as well as other education personnel in state that were attempting to advocate on behalf of the student and explain that financial aid administrators must make determinations of an unaccompanied homeless youth status. This has created a tremendous barrier for the student.
- A student attending a prestigious private university in Georgia needed a subsequent year determination of his unaccompanied homeless youth status from the financial aid office. The student was able to complete

his FAFSA, but ran into problems when he completed a university-mandated CSS (College Scholarship Service) Profile, which requires students to submit information about their parent's income in order to receive institutional aid. The student provided the most recent information that he had about his parents, but the financial aid official claimed that this good faith attempt to comply with the CSS requirements conflicted with the student's unaccompanied homeless youth status. The student was instructed to write a letter explaining his "confusion" about the CSS requirements and to get proof of his situation. Unfortunately, the high school counselor who had previously verified the student's status has passed away, and the student's former high school cannot make a determination of the student's unaccompanied homeless status because he graduated over a year previously. NAEHCY reached out to the financial aid administrator, who was irritated that the student contacted NAEHCY for advice. The financial aid official has not responded to NAEHCY's correspondence, and has suggested to the student that he not contact NAEHCY or any other sources of assistance until the student provides the letters requested by the official.

h. Other Issues: Problems with the Department of Education

A high percentage of respondents in all categories cited the lack of identified contacts at the U.S. Department of Education as an obstacle to their attempts to help unaccompanied homeless youth obtain access to financial aid. This is problematic because it prevents the prompt resolution of questions about the interpretation and application of the regulations governing financial aid for unaccompanied homeless youth.

The survey also reveals cause for concern about the Department's oversight of the program. A *financial aid* respondent reported inconsistent guidance from the ED concerning the documentation of homeless status: "Letter from high school liaison we accepted as proof of homelessness was later deemed unacceptable by the [U.S. Department of Education] when student attended a neighboring college and that fin aid office asked for guidance."

CONCLUSION

The 2007 and 2008 Acts have helped many unaccompanied homeless youth obtain access to federal student financial aid, yet the results of NAEHCY's survey and the callers to NAEHCY's Higher Education Helpline clearly show that much more needs to be done, including the following:

- Financial aid office personnel need better training both about the requirements of the 2007 Act and the challenges facing unaccompanied homeless youth.
- Burdensome redetermination requirements for students who already have been determined homeless should be removed except in cases in which financial aid administrators receive information suggesting that that status has changed.
- The U.S. Department of Education should police the administration of financial aid programs to prevent the imposition of unnecessary and burdensome documentation requirements by financial aid offices.
- Congress should expand the entities that can verify a youth as unaccompanied and homeless to include TRiO and GEAR UP programs, or, at a minimum, should mandate that, when a financial aid administrator receives information from a TRiO or GEAR UP program confirming that a youth is unaccompanied and homeless, the financial aid administrator must give that information substantial weight in making the determination of that student's status.
- Congress should expand the shelters and programs that can verify a young person as an unaccompanied homeless youth in order to permit programs that do not receive HUD or RHYA funding to provide verifications.
- ED's restrictive definition of "youth" to exclude young people ages 22 or 23 should be statutorily overridden. Congress should statutorily define unaccompanied homeless "youth" to include young people under the age of 24.
- Appeals processes relating to homeless youth designations should be mandated and standardized.
- ED should designate points of contact for questions about financial aid for unaccompanied homeless youth and should take consistent and legally correct positions with regard to such questions.

GLOSSARY

TERM	DEFINITION
2007 Act	Cost Reduction and Access Act of 2007, P.L. 110-84.
2008 Act	Higher Education Opportunity Act of 2008, P.L. 110-315.
AVG	The United States Department of Education’s Application and Verification Guide (also referred to as the “2013-2014 <i>Federal Student Aid Handbook</i> ”).
College access respondents	Respondents to the survey who work in college access programs (such as TRiO, GEAR UP, or community college access organizations).
Dependency override	“The “documented determination of independence by reason of other unusual circumstances” that financial aid administrators may make under Section 480 of the Higher Education Act 20 U.S.C. §1087vv(d)(1)(I).
Dependent student	A student who must report parental financial information on, and obtain a parent’s signature, for the FAFSA.
FAA	Financial Aid Administrator(s).
FAFSA	Free Application for Federal Student Aid. The FAFSA is the federal application form that students must complete to apply for virtually all types of federal financial aid including Federal Pell Grants, Federal Work-Study, and Federal Direct Student Loans.
Financial aid respondents	Respondents to the survey who work in higher education, many in financial aid offices.
GEAR UP	Gaining Early Awareness and Readiness for Undergraduate Programs. A discretionary grant program that is designed to increase the number of low-income students who are prepared to enter and succeed in postsecondary education.
Homeless children and youth	Children and youth in a variety of living situations who “lack a fixed, regular, and adequate nighttime residence.” 42 U.S.C. §11434a(2)(A).
HUD	United States Department of Housing and Urban Development.

TERM	DEFINITION
Independent student	Student 24 years of age or older or who fall into certain other designated categories, including veterans, those in graduate or professional school, and those with legal dependents other than a spouse. The 2007 Act expanded the definition of “independent student” to include youth who are verified as unaccompanied and homeless during the school year in which they apply for aid (or who are verified as unaccompanied, at risk of homelessness, and self-supporting). Independent students report their own (and, if they are married, their spouse’s) financial information on the FAFSA.
Liaison	Under the McKinney-Vento Act homeless education provisions, every school district must designate a liaison for children and youth experiencing homelessness. <i>See</i> 42 U.S.C. §11432(g)(1)(J)(ii).
McKinney-Vento Act homeless education provisions	The McKinney-Vento Homeless Assistance Act, reauthorized in January 2002 as Title X, Part C, of the No Child Left Behind Act, is the primary piece of federal legislation dealing with the education of children and youth in homeless situations.
NAEHCY	National Association for the Education of Homeless Children and Youth.
Public school respondents	Respondents to the survey who work in public school and related settings, including State Coordinators for the Education of Homeless Children and Youth, state education agency personnel, school district homeless liaisons, or other school district personnel.
RHYA	Runaway and Homeless Youth Act, codified at 42 U.S.C. §5701, <i>et seq.</i>
Service provider respondents	Respondents to the survey who work in youth services programs, shelters, or transitional living programs.
TLP	Transitional Living Program.
TRiO Programs	Federal outreach and student services programs designed to identify and provide services for individuals from disadvantaged backgrounds.
Unaccompanied youth	“[A] youth not in the physical custody of a parent or guardian.” 42 U.S.C. §11434a(6).

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The National Association for the Education of Homeless Children and Youth (NAEHCY) is the voice and social conscience for the education of children and youth experiencing homelessness. NAEHCY accomplishes this through advocacy, partnerships, and education.

The National Association of Student Financial Aid Administrators (NASFAA) supports the training, diversity, and professional development of financial aid administrators; advocates for public policies and programs that increase student access to and success in postsecondary education; and serves as a forum for communication and collaboration on student financial aid issues.

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