



HOW FINANCIAL AID ADMINISTRATORS CAN RESPOND TO COVID-19'S IMPACT ON UNACCOMPANIED HOMELESS YOUTH SEEKING FINANCIAL AID

Unaccompanied homeless youth are young people experiencing homelessness who are not in the physical custody of a parent or guardian. Prior to the COVID-19 outbreak, 4.2 million youth and young adults experienced homelessness on their own each year, with similar rates of prevalence in rural, suburban and urban areas.

Homelessness among unaccompanied youth is most commonly caused by severe family dysfunction (including abuse, neglect, abandonment, parental substance abuse and/or mental illness), and is exacerbated by poverty. Almost one-third of homeless youth have had prior experiences in the foster care system, while many others were never taken into custody, or avoided disclosing information that would have resulted in being placed in foster care out of fear of the child welfare system. Unaccompanied homeless youth are at a much higher risk for labor and sex trafficking, assault and other forms of victimization than their housed peers.

The COVID-19 outbreak and resulting economic crisis have pushed more youth into homelessness, and at the same time, exacerbated the challenges of youth who were homeless prior to the outbreak. Yet higher education remains their best long-term opportunity for economic independence, health, stability, and well-being.

Unfortunately, even under normal circumstances, unaccompanied homeless youth face extraordinary difficulties in completing the FAFSA. The COVID-19 crisis has created new barriers to financial aid for these students. But with support from financial aid and other supportive higher education professionals, these students can continue making their dreams of a college education come true. Below are relatively simple ways that financial aid administrators (FAAs) can help to remove barriers for these vulnerable students.

1. Create public resources for all students under age 24 to let them know that if they lose their housing as a result of the COVID-19 crisis, they may qualify for independent student status as an unaccompanied homeless youth.

- Not all students who become homeless as a result of the economic crisis will also be unaccompanied youth; some may continue to be supported by their families. But if a student under the age of 24 becomes homeless, he or she may qualify for independent student status as an unaccompanied homeless youth for purposes of filling out the FAFSA. This is not a professional judgement decision, and will require the FAA to make a determination (see strategy 3 below).
- Students who experience a change in housing status that results in homelessness, but who are in the physical custody of their parents (or are being supported by their parents) may qualify under special circumstances for professional judgement to adjust their cost of attendance or the data used to calculate their Estimated Family Contribution (per page AVG-112 in the 2019-20 FSA Handbook).
- In providing outreach to students about financial aid, use language that describes living situations that qualify as homeless under the legal definition (for example, “staying with others temporarily due to loss of housing”) rather than the word “homeless” to help students avoid the stigma and shame associated with homelessness, and better self-identify. FAAs also may use this simple tool to assist in making determinations of unaccompanied homeless status.
- Provide support to individuals with existing UHY determinations to both reconfirm their status and assist with renewal FAFSA applications.

2. Accept information electronically or by phone from the authorities who are legally authorized to determine unaccompanied homeless youth status.

- Under the Higher Education Act, an applicant's status as an unaccompanied homeless youth may be determined by: (1) school district homeless liaisons; (2) U.S. Department of Housing and Urban Development (HUD) shelter directors or designees; (3) Runaway and Homeless Youth Act (RHYA) shelter directors or designees; and (4) financial aid administrators (FAAs).
- A determination by an authority in category (1), (2), or (3) is valid and sufficient. There is no need to confirm a liaison's or shelter provider's information, unless you receive conflicting information (per page AVG-118 in the [2019-20 FSA Handbook](#)).
- It is especially important to accept information from liaisons or shelter providers electronically and limit efforts to confirm determination during the current COVID-19 crisis because liaisons and shelter providers, too, are working remotely. If, however, you do need to contact a liaison or other authorized entity, remember that they are facing unprecedented difficulties, as more and more young people become homeless, move from place to place, and struggle with basic needs and remote schooling. Please be patient and seek alternative ways to communicate, such as texts or calls to mobile numbers.

3. Expect to make more determinations of unaccompanied homeless youth status yourself.

As a result of the COVID-19 crisis, FAAs will need to make determinations of unaccompanied homeless youth status more frequently.

- Many young people who may not have been homeless when they applied to or first attended college will become unaccompanied homeless youth as a result of the outbreak. Many of these students will not know a school district homeless liaison (because they were not homeless during their K-12 school years) or a homeless shelter provider (because they have never been homeless before). These youth will not be able to obtain determinations from school district liaisons or homeless shelter providers.
- In addition, other youth who were homeless before college may not be able to contact the authorities who determined them previously.
- This means that FAAs will be the only legally-authorized entity for these young people. In such instances, the FAA must make a determination. The unaccompanied homeless youth status is not a professional judgement decision. Financial aid administrators are required to make a determination of UHY status based on the legal definition of homelessness. See [Dear Colleague Letter GEN-15-16](#). Also, see p. AVG-117 the [2019-2020 FSA Handbook](#), “If a student does not have and cannot get documentation from any of the authorities given on page 27, you (the financial aid administrator) must determine if she is an unaccompanied youth who is homeless or is self-supporting and at risk of being homeless.”

4. In making determinations of unaccompanied homeless youth status, note that you may rely on phone interviews that you document.

- In making the unaccompanied homeless youth determination, allow for documented interviews, rather than paperwork from the applicant.
 - A “documented interview” is a valid basis for a determination of unaccompanied homeless youth status. (See p. AVG-117 the [2019-2020 FSA Handbook](#) “The determination may be based on a documented interview with the student if there is no written documentation available.”)
 - There is no requirement that such an interview take place in person, and under current social distancing guidelines and school closures, an in-person interview would be inappropriate. Conducting an interview by phone or other remote means to which both you and the applicant have ready access is acceptable.
 - In light of widespread stay-at-home orders, it is more difficult than ever for applicants to access the kind of documents that FAAs may be used to relying on for such determinations. Youth and other people who have knowledge of the youth’s circumstances may not have access to printers, scanners, fax machines, or the postal service. Social distancing and stay-at-home orders may prevent them from being able to obtain documentation. Moreover, youth and other people who have knowledge of the youth’s circumstances are in “survival mode,” focused on basic needs, without the time to track down documentation.
 - The National Center for Homeless Education’s [Tool for Making Unaccompanied Homeless Youth Determinations](#)—a form prepared by the U.S. Department of Education’s technical assistance center on homeless education - may be used by FAAs to aid in the UHY determination process.
- In making the determination, focus on the only legally relevant issue: whether the applicant is an unaccompanied homeless youth, as defined in section 725 of the McKinney-Vento Homeless Assistance Act (McKinney-Vento) (42 U.S.C. 11434a), or is unaccompanied, at risk of homelessness, and self-supporting. The U. S. Department of Education (ED) instructs FAAs to make determinations of unaccompanied homeless youth status based on the legal definition of homelessness, which describes homeless living situations, but not the reasons for the homelessness. (See p. AVG- 117 of the [2019-20 FSA Handbook](#), “Do not focus on why the student is homeless or unaccompanied but on whether the evidence shows that he is an unaccompanied homeless youth as defined in section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a)”).
- If the applicant is an unaccompanied homeless youth at any point after July 1, 2019, he or she would meet the criteria for independent student status as an unaccompanied homeless youth for this (2019-2020) and next (2020-2021) academic year.

5. Streamline processes for the annual determination for unaccompanied homeless students who were previously determined.

- Under current law, unaccompanied homeless youth status must be determined each year until a student is 24 years old.
- Some institutions have adopted a presumption that independent student status continues from the previous year, except if there is specific information that would indicate the student is no longer unaccompanied and homeless or at risk of homelessness. This practice, and phone interviews that document the youth's situation, greatly ease the burdens of annual determinations for everyone involved and avoid re-traumatizing youth.
- In making annual determinations, keep in mind that re-determination by the original authorized entity is not required. With the massive dislocation caused by COVID-19, it is particularly difficult, if not impossible, to direct youth to get determined by whoever determined them the first time.
- Also keep in mind that if your institution does not use a presumption supported by minimal documentation that unaccompanied homeless youth status continues from the previous year, and if a determination is not available from a liaison or shelter provider, the FAA must make the determination based on the legal definitions.
- Consider suspending any policies or requirements calling for notarized documentation.
 - Because a notarized document must be signed in the presence of the notary public, requests for notarized documents are inconsistent with social distancing guidance and create both an unnecessary burden and dangers to your students.