

Most Frequently Asked Questions from NASFAA's Webinar Helping Homeless Youth with the FAFSA January 26, 2022



The following are answers to the most frequently asked questions presented during the webinar. You may search or browse the [AskRegs Knowledgebase](#) for answers to any follow-up questions you may have and/or submit them as AskRegs tickets.

Question	Answer
1. What are best practices regarding the amount of reference sources (doctors, social workers, counselors, etc.) a financial aid administrator (FAA) is required to collect to determine homelessness, risk of homelessness, unaccompanied youth?	In light of the challenges faced by students today, best practice is to minimize documentation. FAAs only need to determine that a student met or meets the legal definitions. If a student does not have, and cannot obtain written documentation, a FAA may make a determination based on a documented interview. The FAA can utilize the National Center for Homeless Education toolkit to make a determination.
2. What are the four entities authorized to make a determination of homelessness?	A school district homeless liaison, director or designee of a U.S. Department of Housing and Urban Development (HUD) homeless assistance program, director or designee of a Runaway and Homeless Youth Act (RHYA) program, and a FAA may make an unaccompanied homeless youth determination.
3. Which Dear Colleague Letter (DCL) discusses unaccompanied homeless youth and making determinations?	GEN-15-16 is the most recent DCL with guidance on unaccompanied homeless youth determinations.
4. Where do we find the new provisions for unaccompanied homeless youth?	The new provisions are codified in the Consolidated Appropriations Act of 2021 .
5. Do charter schools need to have a homeless liaison? There may be many charters out there who don't and may not be familiarized with the McKinney-Vento Act.	Yes, public charter schools also fall under the McKinney-Vento Act. Please also see the Toolkit: How Charter Schools Can Support Students Experiencing Homelessness .
6. The <i>FSA Handbook</i> indicates that if a student does not have and cannot get documentation from any of the authorities then the FAA must determine their status. However, later on it states that we are not required to confirm the answers to the homeless youth questions unless you have conflicting information. Can you clarify, are we required to gather documentation and keep on file when a student answers yes to question 55, 56 or 57? Or is no documentation needed at all unless there is conflicting information?	GEN-15-16 states, "Institutions are not required to verify the answers to the homeless youth questions; however, in instances where the institution has conflicting information, a documented phone call or a written statement from the relevant authority is sufficient. It is not conflicting information if an FAA disagrees with an authority's determination that a student is homeless. If an FAA believes the authority is incorrect or abusing the process, the FAA should contact the relevant oversight party to evaluate the determination. ...[S]ome institutions are unnecessarily restricting applicants' access to aid by asking applicants to provide justification as to why they are homeless or unaccompanied rather than evidence that they have been determined to be homeless or at risk of being homeless. Institutions should limit any inquiry to whether the applicant has been determined to be an unaccompanied youth who is homeless, or at risk of being homeless, rather than the reasons for the applicant's homelessness."

Question	Answer
7. If the entire family is homeless, would the student still be considered homeless? If the student is still in the physical custody of the parent, they wouldn't fit the unaccompanied homeless youth definition since they would still be in the physical custody of the parent.	You are correct, if the entire family is homeless, the students are not considered unaccompanied youth. While such students cannot be considered independent, they may still need additional support from the institution.
8. What do you do with comment code 163?	No resolution is required, the text states that a financial aid administrator has reviewed the applicant's record and confirmed the applicant is a homeless youth. See the 2022-23 SAR Comment Codes and Text Guide .
9. Do we have to wait until the 2024-25 award year for these provisions to be effective?	No, you can start implementing many of these provisions now, as most are based upon current guidance. The change is that they are now codified in law.
10. What if a student who was previously homeless has had their family situation change and they no longer want to be considered independent?	It is possible for the student to be independent one year (as an unaccompanied homeless youth) and to be dependent the next year if they are back with their family.
11. Does homeless status extend to graduate students or becoming a graduate student?	Regardless of age, graduate students are classified as independent. Also, as graduate students, they are eligible for significantly higher levels of federal aid. While a graduate student may be homeless, they are not classified as unaccompanied youth.
12. Historically, our school uses the dependency override option for PJ and Homeless youth (after meeting with students initially and in subsequent years) on FAFSA corrections submitted to FAA Access. Should we differentiate between these two available options when submitting the corrected FAFSA instead?	An unaccompanied homeless youth (UHY) is a student under 24 who lacks a fixed, regular, adequate nighttime residence and is not in the physical custody of a parent or guardian. A determination letter from (i) a school district homeless liaison, (ii) a U.S. Department of Housing and Urban Development (HUD) Shelter Director or Designee, or (iii) a Runaway and Homeless Youth Act (RHYA) Shelter Director or Designee is sufficient documentation. If the applicant does not provide such a letter, the FAA must make a determination and do so based solely on the legal definition of homelessness. Unlike a dependency override, a determination that an applicant is a UHY, and, therefore, an independent student, does not involve or rely on the exercise of professional judgment. A student seeking a dependency override, by contrast, is a youth under 24 who might have other unusual circumstances. The determination whether the student meets the criteria for a dependency override would involve the exercise of professional judgment by the financial aid administrator.
13. Could students be determined homeless, unaccompanied, or at-risk for homelessness if they are living on campus at their college or university	Yes, UHY are still considered homeless despite residing in campus housing. The 2021-22 FSA Handbook , page AVG-96 includes in the definition of homelessness: "...also includes living in the school dormitory if the student would otherwise be homeless."

Question	Answer
14. If a dependent student was recently evicted along with their parents, would we change them to at “risk of being homeless” which would make them Independent?	Since the student is still with their parents, the student would not meet the definition of “unaccompanied” and, therefore, would not be an independent student based on the eviction alone. If the eviction resulted in homelessness, the student may now be able to update one of the FAFSA dependency status questions due to “a change in housing status that results in an individual being homeless,” per page AVG-90 of the 2021-22 FSA Handbook . A dependency override is not an option based solely on the fact that the student and their family were evicted and are now homeless.
15. Can the student’s status change in the middle of the aid year? I met with a student whose parents were included on the FAFSA, but is now estranged and at risk for homelessness. Can we make the change now for 2022 or do we need to wait and make that determination when they complete their 2023 FAFSA?	A FAA can make a determination in the middle of the year if circumstances change OR if the student accidentally listed another adult who is not a parent on the FAFSA.
16. Which states require a single point of contact for homeless youth?	California, Tennessee, Maine, Maryland, Louisiana, Nevada, and Illinois. In addition, the following states have informal networks of single points of contact: North Carolina, Colorado, and Georgia You can see more laws on higher education and homelessness here: https://schoolhouseconnection.org/state-laws-supporting-college-students-experiencing-homelessness/
17. How do you balance students who claim to be homeless, but only because they had a temporary fight with a parent but you don't sense it's a long term change?	When having a conversation with the student, use discretion when gathering information and respect the student’s privacy. The focus should be on if the student is an unaccompanied homeless youth and not the reasons for why a student is homeless or unaccompanied. If a student experienced homelessness and was unaccompanied at any point in time on or after July 1st of the award year, he or she can fill out the FAFSA as an unaccompanied homeless youth. However, if the student’s housing situation has changed and does not meet the definition of an unaccompanied homeless youth, the student has the responsibility to inform the financial aid office.
18. What does transitional shelter mean? We have a student who lives at one currently, for mental illness. Not funded by HUD or RHYA. Does this count for Unaccompanied Youth?	Transitional shelters are programs that offer temporary residence ranging from months to several years. Currently, a determination letter from this shelter would not be sufficient to qualify this student as an unaccompanied homeless youth, because it is not HUD or RHYA funded. However, a letter from the shelter can serve as supporting documentation for you (the FAA) to make a determination that this student is in fact an unaccompanied homeless youth.

Question	Answer
<p>19. When making an FAA determination, do we need to document they are self-supporting? If they are couch surfing, they may not be self-supporting, but I feel like they should still be considered homeless.</p>	<p>No. A student can be an unaccompanied homeless youth, or self-supporting and at risk of homelessness. A student does not have to meet both criteria in order for a financial aid administrator to make an unaccompanied homeless youth determination. See Chapter 5, Volume AVG of the <i>FSA Handbook</i>.</p>
<p>20. Does sharing the housing of others include living with other family members, when the parents are not in the picture, when that other family is not a legal guardian? Would they be considered unaccompanied or homeless in these cases?</p>	<p>The presence or absence of legal guardianship papers do not, by themselves, indicate that a student meets the definition of an unaccompanied homeless youth. Students who are staying with other people (including relatives) due to loss of housing, economic hardship, or a similar reason meet the definition of homeless. If the student is not in the physical custody of a parent or guardian, he or she meets the definition of unaccompanied. Determinations of homeless status should be based on the legal definition of homelessness in the education subtitle of the McKinney-Vento Act, and made on a case-by-case basis. In the absence of a determination from one of the authorities cited in the answers to the previous questions, you will need to make further inquiries into the students' situation in order to determine whether the definition of UHY applies to the student. The 2021-22 FSA Handbook, page AVG-97 provides some resources for making the determination.</p>