

# Most Frequently Asked Questions from the NASFAA & SchoolHouse Connection Webinar – Removing Barriers to Financial Aid for Unaccompanied Homeless Youth

April 10, 2019



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

Question	Answer
<p>1. If I receive a McKinney-Vento letter that seems to say the student is homeless, can I assume he is an unaccompanied homeless youth (UHY)? Since I have a McKinney-Vento determination from his high school liaison, is that sufficient, or do I need to verify he is really unaccompanied also?</p>	<p>A determination from a high school liaison is sufficient. You do not need to verify or request additional information, unless you receive conflicting information. Per p. AVG-118 in the 2018-19 <i>FSA Handbook</i>, “It is not conflicting information if you disagree with an authority’s determination that a student is homeless. If you believe the authority is incorrect or abusing the process, accept his determination but contact the following oversight party...”</p>
<p>2. Is an unaccompanied homeless youth status a professional judgement decision, or must schools make a determination for students who identify as UHY on FAFSA?</p>	<p>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 <a href="#">GEN-15-16</a>. Also, see p. AVG-117 the 2018-19 <i>FSA Handbook</i>, “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.”</p>
<p>3. What are the four legal authorities referenced?</p>	<p>School district homeless liaisons, U.S. Department of Housing and Urban Development (HUD) Shelter Director or Designee, Runaway and Homeless Youth (RHYA) Shelter Director or Designee, and Financial Aid Administrator</p>
<p>4. I am the UHY financial aid administrator (FAA) for UHY, I accepted this responsibility from someone who created a log for the student to provide a history of where they’ve lived, including email addresses, etc. How would a UHY sometimes remember the details of where they stayed? Is this something that is a must?</p>	<p>No, this practice is not required. It could present a barrier to UHY; therefore, we suggest discontinuing this practice.</p>
<p>5. FAA determination question: Student is currently in stable housing and does not meet definition of UHY, but they were for a few months homeless on/after July 1, 2018 (as per the 2019-20 FAFSA). Is the FAA able to make a UHY determination for 2019-20, though at the time they reach out to us they no longer meet the definition?</p>	<p>Yes, if the student was homeless at any point on/after July 1 of the preceding year, he or she would still meet the criteria for independent student status as UHY for 2019-20.</p>

<p>6. How do you make the determination that a student is truly homeless without documentation?</p>	<p>FAAs are authorized to make a determination based on a documented interview with the student. Utilize the NCHE FAA determination tool: <a href="https://nche.ed.gov/wp-content/uploads/2019/02/FAA-UHY-higher-ed-tool-2019-2020-REVFeb2019-WITH-FIELDS.pdf">https://nche.ed.gov/wp-content/uploads/2019/02/FAA-UHY-higher-ed-tool-2019-2020-REVFeb2019-WITH-FIELDS.pdf</a></p>
<p>7. Must the determination of an unaccompanied homeless youth include that they are fleeing an abusive or unsafe home?</p>	<p>No. In fact, the U. S. Department of Education (ED) instructs FAAs to make determinations of UHY status based on the legal definition of homelessness in the Higher Education Act (HEA) of 1965, as amended. This definition describes homeless living situations, but not the reasons for the homelessness. See p. AVG-117 of the 2018-19 <i>FSA Handbook</i>, “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)”.</p>
<p>8. How do other institutions handle a student that is returning a second, third or fourth year after reporting homeless their first year? Are we required to recertify every year for homelessness/dependency appeals? What is an acceptable practice or documentation to determine unaccompanied homelessness status each year?</p>	<p>Under current law, the UHY status must be determined each year until a student is 24 years old. Some institutions ease the financial aid process in subsequent years for unaccompanied homeless youth by continuing their independent student status in the annual redetermination, except if there is specific information that would indicate the student is no longer unaccompanied and homeless or at risk of homelessness. Other institutions go the route of a dependency override in subsequent years in order to reduce the stress and paperwork of the annual determination. Institutions may accept documentation from liaisons or homeless service providers in subsequent years, provided that those liaisons and providers have information about the student that allows them to make the determination. In addition, a documented interview with a student is sufficient for FAAs to determine UHY status.</p>
<p>9. Are there schools that don't have access to McKinney-Vento liaisons? Are these liaisons only in certain districts? We had a student that says she was abused and now living with her teacher but didn't have a McKinney-Vento determination letter - is this something they could get?</p>	<p>Under the federal McKinney-Vento Act, every school district is required to designate a liaison for homeless children and youth. Liaisons are required to inform UHY of their status as independent students under the FAFSA, and help them obtain documentation. A list of liaisons and their contact information should be available on the state education agency website. State coordinator contact information may be found <a href="#">here</a>. However, it is important to remember that FAAs can make a determination of UHY status without this documentation, and that it may create a barrier for the student to track down his or her liaison and request the determination. A documented interview by a FAA is sufficient documentation to establish UHY status.</p>

<p>10. Given that a student may have applied for financial aid months ago with parent information, but may have experienced homelessness and no longer have fixed housing since then, is information on the filed FAFSA considered conflicting information if a letter from an approved agency comes after that filing date?</p>	<p>No, this would not be considered conflicting information. Students' situations may change throughout the academic year. The financial aid administrator can make changes to the student's status, either by accepting the agency letter, or by documenting an interview with the student.</p>
<p>11. Is it true that the reason a student is couch-surfing does not matter but that fact they are is what we need to document? We could have a student that didn't want to live under their parent's rules and decide to leave the home. Does this change the situation or is this not something we need to focus on?</p>	<p>Per federal guidance, the determination process must focus only on if a youth meets the legal definition of being unaccompanied and homeless, or at risk of being homelessness, rather than the reasons for the applicant's homelessness. See Dear Colleague Letter <a href="#">GEN-15-16</a>, "FAAs should limit their inquiry to whether the applicant is an unaccompanied youth who is homeless, or at risk of being homeless, rather than the reasons for the applicant's homelessness."</p>
<p>12. We have students who live with relatives but there's no legal document stating they are their legal guardians, is this student UHY?</p>	<p>Determinations of homeless status should be based on the legal definition of homelessness, and made on a case-by-case basis. The presence or absence of legal guardianship papers do not, by themselves, indicate that a student meets the definition of homelessness. For example, in some instances, students may live in a fixed, regular, and adequate situation with relatives who do not have legal guardianship papers. In those instances, the student would not meet the definition of homelessness. In other cases, the living situation is not fixed, regular, and adequate, and the student would meet the definition. NCHE has a good brief on making eligibility determinations here: <a href="https://nche.ed.gov/wp-content/uploads/2018/10/det_elig.pdf">https://nche.ed.gov/wp-content/uploads/2018/10/det_elig.pdf</a>.</p>
<p>13. Can you share more tips on how you avoid re-traumatizing students as they re-apply each year for independent student status?</p>	<p>You can avoid re-traumatizing students by continuing their independent student status in the annual redetermination, except if there is specific information that would indicate the student is no longer unaccompanied and homeless or at risk of homelessness. You also can create a safe and comfortable environment for students. For example, some financial aid administrators host office hours with snacks for students to come in, or have counselors available to come with students for additional support. Focus solely on if the student meets the definition of UHY rather asking prying questions about how or why the student is homeless. For more tips, see here, <a href="https://www.schoolhouseconnection.org/the-new-fafsa-is-out-three-things-you-can-do-to-help-homeless-and-foster-youth/">https://www.schoolhouseconnection.org/the-new-fafsa-is-out-three-things-you-can-do-to-help-homeless-and-foster-youth/</a>.</p>

<p>14. Is the McKinney-Vento form good for just one academic year? We allow for the freshman year and reevaluate.</p>	<p>Yes, the liaison determination is only good for one year. The statute requires that youth be determined as UHY in the year in which they are submitting the application for financial aid. In subsequent years, the liaison can write letters if they have enough information about the student to make the determination, but if they do not, then the FAA must make the determination. A documented interview suffices for this determination.</p>
<p>15. Question for Middle Tennessee State University: Are your mentors former foster youth/homeless youth? How do you ask them to mentors?</p>	<p>Yes, our mentors are former foster/homeless youth that are juniors and seniors. These students must be in academic good standing and complete an application process. As has been the case with all of our mentors, they seek us out, we do not have to recruit. These are students that we have helped get through some really troubling times, and they were helped by mentors along the way. They want to serve and pay it back to new students. It really is the best part of our program. See more information here, <a href="https://mtsu.edu/nextstep/about.php">https://mtsu.edu/nextstep/about.php</a>.</p>
<p>16. We have students who get kicked out of the family home after high school graduation, but we don't have homeless shelters in our community. They can't get confirmation but move from place to place. They are often confused about how to complete the FAFSA, and they request a dependency override. Once we start trying to document information for a dependency override, we realize they should be homeless, but making that correction to the FAFSA seems to be stating that we have documentation. What do you do in those situations?</p>	<p>FAAs are not only authorized to make determinations of UHY status, they are required to do so if a student doesn't have a determination from a party that is authorized by the HEA. A documented interview with the student can serve the purpose of documentation in these situations. You can utilize the NCHE FAA determination tool: <a href="https://nche.ed.gov/wp-content/uploads/2019/02/FAA-UHY-higher-ed-tool-2019-2020-REVFeb2019-WITH-FIELDS.pdf">https://nche.ed.gov/wp-content/uploads/2019/02/FAA-UHY-higher-ed-tool-2019-2020-REVFeb2019-WITH-FIELDS.pdf</a>.</p>
<p>17. We had a student that was homeless for a few years between graduating high school and turning 22. She now is living with her boyfriend and her name is on the lease. She has minimal contact with parents and is self- supporting. How would you move forward with this student?</p>	<p>This student no longer meets the definition of UHY. You could proceed with professional judgement in light of her history.</p>
<p>18. What happens to the student when they are not considered homeless because of their campus housing?</p>	<p>UHY are still considered homeless despite campus housing. Page AVG-117 of the 2018-19 <i>FSA Handbook</i> includes in the definition of homelessness: "...also includes living in the school dormitory if the student would otherwise be homeless." Unless the student has reunified with their parents and has stable, regular, and safe housing outside of the dorm, for school breaks and summer, and also is no longer at risk of homelessness, the student continues to be an unaccompanied homeless youth.</p>

<p>19. We have a student who is unaccompanied (not living with parent) and is living on their own in an apartment. They express they are “at-risk” of being homeless because if the student loses their job, they could be evicted and then be homeless. What are your suggestions on the determination? Does this meet the definition?</p>	<p>According to p. AVG-117 of the 2018-19 <i>FSA Handbook</i>, at risk of homelessness is defined as “when a student’s housing may cease to be fixed, regular, and adequate, for example, a student who is being evicted and has been unable to find fixed, regular, and adequate housing.” We do not believe that the possibility of the loss of a job meets this standard.</p>
<p>20. Our compliance company told us that we have to ask for documentation for UHY; our institution requires documentation. How do we work with these companies, our institutions, and financial aid administrators who may not be as sensitive to or understanding of the students’ situations?</p>	<p>Compliance companies may not be aware of the specific provisions in the <i>FSA Handbook</i> that clearly state that 1) verification is not required; 2) FAAs must make determinations based on the legal definition of homelessness if youth don’t have documentation from an authorized party; 3) a documented interview suffices; and 4) a template exists for documenting interviews. In addition to informing compliance companies and institutions about these provisions and Dear Colleague Letter <a href="#">GEN-15-16</a>, it can be helpful to share the findings of the <a href="#">2016 GAO report</a> that describes the barriers created by documentation requests. Another suggestion is to ask local homeless youth providers and/or local liaisons to meet with institutional leaders and financial aid directors, to explain the realities of youth homelessness and the ways in which financial aid practices unintentionally can retraumatize youth and stand in the way of their pursuit of higher education.</p>