

# Most Frequently Asked Questions from NASFAA's Removing Barriers and Increasing Access to Financial Aid for Unaccompanied Homeless Youth Webinar

May 5, 2020



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

Question	Answer
<p>1. We met with a student to make a determination on homeless youth status. It came up that the student is no longer homeless because she was now residing in an apartment. I didn't think it was a fair assessment to the student. Had she resided on-campus, the committee was okay with it, but it was the fact that she had an apartment that was hemming them up, can you comment on this?</p>	<p>Per page <a href="#">AVG-27 of the 2019-20 FSA Handbook</a>, if the student met the definition of unaccompanied homeless youth (UHY) on or after July 1st of the date in which he or she filled out the FAFSA, the student would be considered independent, "irrespective of whether he or she is currently experiencing homelessness." Therefore, if the student met the definitions prior to moving into an apartment, he or she should have been determined to be an unaccompanied homeless youth and an independent student.</p>
<p>2. 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?</p>	<p>In light of the challenges faced by students today, best practice is to minimize documentation or reference requests. 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.</p>
<p>3. An AskRegs answer to a question indicated that we cannot take a McKinney-Vento letter from a high school homeless liaison for continuing students. The answer made it seem like we can only accept the letter for the year in which the student graduated from high school. Subsequent years we would have to get different documentation. Was that answer correct?</p>	<p>Per page <a href="#">AVG-118 of the 2019-20 FSA Handbook</a>, "local liaisons may write subsequent-year letters of verification for unaccompanied homeless youth through age 23 for whom they have the necessary information to write such letters. This documentation is acceptable for verifying unaccompanied homelessness." In its <a href="#">guidance to state and local educational agencies</a>, the U. S. Department of Education (ED) states that "[a] local liaison may continue to provide verification of a youth's status as either unaccompanied and homeless, or as self-supporting and at risk of being homeless, for federal student aid purposes for as long as the liaison has access to the information necessary to make such a determination for a particular youth."</p>
<p>4. Please define self-supporting. How do you determine if a student is self-supporting and document it?</p>	<p>Per page <a href="#">AVG-117 of the 2019-20 FSA Handbook</a>, self-supporting is defined as "when a student pays for his own living expenses, including a fixed, regular, and adequate housing." FAAs can use this <a href="#">tool</a> from NCHE to document and determine if a student is self-supporting.</p>
<p>5. If a parent already completed the FAFSA and now the student comes to you and tells you they were kicked out, do you then change the FAFSA to indicate they are homeless and remove the parent info?</p>	<p>NASFAA response: If a student can now answer "yes" to any of the three FAFSA questions 55-57 related to homelessness, they must do so. However, if the student cannot answer "yes" to any of these questions but feels it is impossible to return to return home, they should discuss this with an FAA to determine whether their situation constitutes grounds for a dependency override. See the 2019-20 <i>FSA Handbook</i>, pages AVG-90 to AVG-91 and AVG-113 to AVG-115.</p>
<p>6. Couldn't a dependency override appeal be more of a long-term solution for students meeting with you for an UHY interview? If there is more to the story than just the transitional housing issue, such as being kicked out because of their sexuality,</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. Some institutions address this challenge by simply checking in with the student to see if anything in their situation has changed; if nothing has changed, they then continue the student's independent student status in the annual redetermination (except if there is specific</p>

<p>wouldn't a dependency override make more sense since it doesn't exactly require yearly review and potentially cause them to revert back to dependent if their housing is no longer question?</p>	<p>information that would indicate the student is no longer unaccompanied and homeless or at risk of homelessness and self-supporting). Other institutions go the route of a dependency override in subsequent years in order to reduce the stress and paperwork of the annual determination for the student. Institutions also 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>7. Could students be determined homeless, unaccompanied, or at-risk for homelessness if they are living on campus at their college or university?</p>	<p>Yes, UHY are still considered homeless despite residing in campus housing. The 2019-20 <i>FSA Handbook</i>, page <a href="#">AVG-117</a> includes in the definition of homelessness: "...also includes living in the school dormitory if the student would otherwise be homeless."</p>
<p>8. Can you discuss the definition of "temporary"? For instance, we had a student who has resided with her brother for quite some time and he claims her on his taxes. She has no contact with parents, and is not in legal guardianship, but seems to have relatively stable housing. Last year, the high school liaison issued an Unaccompanied Youth determination letter and we're trying to decide what to do this year since nothing has changed.</p>	<p>Per, page AVG-117 of the 2019-20 <i>FSA Handbook</i>, "It is important to make homeless youth determinations on a case-by-case basis." If the situation with her brother appears to have become fixed, regular, and adequate, she may no longer meet the definition of homelessness. If, on the other hand, she is unsure how long she will be able to stay with her brother, she would still meet the definition of lacking, fixed, regular, and adequate housing. This <a href="#">tool</a> from NCHE can be helpful in determining if a student continues to meet the definition of homeless.</p>
<p>9. 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?</p>	<p>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 <a href="#">AVG-112</a> of the 2019-20 <i>FSA Handbook</i>. A dependency override is not an option based solely on the fact that the student and their family were evicted and are now homeless.</p>
<p>10. Is timing of the interview a factor, or is there an annual date when we can complete the interview with student? For example, do we have to wait until July 1, 2020, to complete UHY determination via student interview for the 2020-2021 year?</p>	<p>There is no annual date for completing the interview; it simply must document that the student met the legal definitions after July 1st of the year in which the student is submitting the application. Per page <a href="#">AVG-27 of the 2019-20 FSA Handbook</a>, if the student met the definition of unaccompanied homeless youth on or after July 1st of the date in which he or she filled out the FAFSA. For the 2020-2021 school year, the student would have needed to be homeless on or after July 1, 2019 and have an interview between July 2019 to June 2020.</p>
<p>11. If a student's status changes from the original FAFSA status are we able to update their status to help them get more aid?</p>	<p>Yes, if a student's situation has changed since filling out the FAFSA and the student is now an unaccompanied homeless youth, the student's status can be updated.</p>
<p>12. Concerning subsequent years, if the student provided outside documentation their first year but then doesn't have it the second year, we should then bring them in for an interview without going after more outside documentation?</p>	<p>Yes, if a student isn't able to provide outside documentation after the student's first year, the FAA must make a determination based on the legal definitions. However, per page <a href="#">AVG-117 of the 2019-20 FSA Handbook</a>, the determination may be made based on a documented interview if the student does not have written documentation.</p>
<p>13. What is the difference between an unaccompanied homeless youth and a</p>	<p>An unaccompanied homeless youth (UHY) is a student under 24 who lacks a fixed, regular, adequate nighttime residence and is not in the</p>

<p>student trying to file a dependency override?</p>	<p>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 <i>must</i> make a determination and do so based solely on the legal definition. 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.</p>
<p>14. If we did a dependency override for one year, and the student answered “Yes” the following year to one of the homelessness questions on the FAFSA, would that be considered conflicting information and would we then need to follow up and request documentation of homelessness?</p>	<p>Regardless of the dependency override the previous year, if a student answers “yes” to one of the three homelessness questions on the FAFSA and can provide 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, the FAA should accept this letter, mark the student as independent and not collect any other additional documentation. In addition, per page <a href="#">AVG-117 of the 2019-20 FSA Handbook</a>, “if a student does not have and cannot get documentation from any of the authorities given on page 27, you (the FAA) must determine if she is an unaccompanied youth who is homeless or is self-supporting and at risk of being homeless.” The determination may be made based on a documented interview if the student does not have written documentation.</p>
<p>15. We have students who live with relatives, but there’s no legal document stating they are the legal guardians, is this student an UHY?</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 definitions of homelessness, 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 2019-20 FSA Handbook, page <a href="#">AVG-117</a> provides some resources for making the determination.</p>
<p>16. Did I understand you to say that if a student answers yes to one of the three homelessness questions on the FAFSA, we are not to flag it to collect any documentation?</p>	<p>If a student answers “yes” to one of the three homelessness questions on the FAFSA <i>and</i> can provide a documentation 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, the FAA should accept this letter, mark the student as independent, and not collect any other additional documentation. Per page <a href="#">AVG-118 in the 2019-20 FSA Handbook</a>, “You are not required to confirm the answers to the homeless youth questions unless you have conflicting information. A documented phone call with, or a written statement from, one of the relevant authorities is sufficient verification when needed.”</p>
<p>17. Who are the four legal authorized entities that can make UHY determinations?</p>	<p>(1) School district homeless liaisons, (2) U.S. Department of Housing and Urban Development (HUD) Shelter Directors or Designees, (3)</p>

	Runaway and Homeless Youth Act (RHYA) Shelter Director or Designee, and (4) Financial Aid Administrator.
19. What if the parents are still providing for the student's health insurance, but the student does not live with them. Are they still considered homeless?	An applicant is an unaccompanied homeless youth if the applicant meets the legal definitions of homeless (lacks a fixed, regular, and adequate nighttime residence) and unaccompanied (is not in the physical custody of their parent or guardian). Health insurance is not part of either definition.
20. Our compliance company told us that we have to ask for documentation for UHY. Our institution requires additional 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>It can be helpful to share the findings of the <a href="#">2016 GAO report</a> that describes the barriers created by documentation requests for unaccompanied homeless youth, and the hardships they experience in attempting to provide documentation. Another suggestion is to ask local homeless youth providers and/or local McKinney-Vento 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. Youth themselves are the best spokespeople, and with assistance, should be invited to participate in professional development.</p> <p>It also can help to share best practices from institutions that have streamlined processes, such as <a href="#">CSU Long Beach</a>, to show how a less burdensome process can be adopted. To the extent that a compliance company is advising you to seek or create <i>additional</i> documentation, the company may not be aware of the specific provisions in <i>FSA Handbook</i> that provide for minimal documentation, include a documented interview.</p>