



**Welcome to SchoolHouse Connection's Webinar  
Understanding Federal Student Aid Policy and Practice  
For Unaccompanied Homeless Youth  
June 28, 2017**

Links for information included in the webinar

The PowerPoint, webinar recording and handouts will be available on our website, at <http://www.schoolhouseconnection.org/webinars/>

For information from the US Department of Education: <https://ifap.ed.gov/ifap/>

To reach your local McKinney-Vento liaison, you can contact your State Coordinator. Contact list is available at: [https://nche.ed.gov/states/state\\_resources.php](https://nche.ed.gov/states/state_resources.php)

For data on unaccompanied homeless youth: <http://www.schoolhouseconnection.org/higher-education/>

For laws, guidance and other information on higher education and homelessness: <http://www.schoolhouseconnection.org/higher-education/>

**Questions and Answers**

**Q: What if a student is doubled up with another family due to parent/s being deported? Are they considered unaccompanied homeless youth?**

A: Generally, yes. A student staying with other people due to loss of housing, economic hardship or a similar reason are considered homeless. When a parent is deported, the child effectively loses housing, since the child cannot live alone. The child also would be considered unaccompanied, since s/he is not in the physical custody of a parent or guardian. There may be rare circumstances in which the parent is able to provide a fixed, regular and adequate

nighttime residence for the youth despite being deported, but that certainly would not be typical.

**Q: A trailer park is not the same as a mobile home park/community. Correct? We get that question a lot.**

A: What the park or community is called is not really the distinguishing factor. Parks may be called different things in different places. The law bases eligibility on the language “living in ... trailer parks.. due to the lack of alternative adequate accommodations.” So the question would be focused on whether the trailer or mobile home is adequate. Many mobile home parks offer housing that is fixed, regular and adequate, and so would not typically qualify as “homeless.”

**Q: A 19 year old, self-supporting student with 2 jobs and no help from parents wants to go to college for the 1st year. However, when the student was with the LEA in high school, he was living with the parent then? Would he be eligible for independent student status?**

A: A student who is “taking care of themselves,” is not an independent student just by virtue of being self-supporting. Even if a student is self-supporting, if the student does not meet any of the other independent student criteria, the student would still need to provide parental information on the FAFSA.

An unaccompanied homeless youth may qualify for independent status if they are determined to be unaccompanied and homeless. Unless the student is homeless, unaccompanied, and is not being supported by their parents, the student would still be a dependent student and need to provide parental information. It should be noted that a parent not wanting to provide their information on the student’s FAFSA, or a parent not wanting to pay for their child’s college cost is not in itself a justification for an independent student status.

If a student is not unaccompanied and homeless or at risk-of-homelessness, but has circumstances that he or she thinks warrant their being independent, he or she should contact their school to inquire about a dependency override.

Students who are unaccompanied, self-supporting and at-risk of homelessness when they complete the FAFSA qualify as independent students. If they lived with their parents in the past, that does not disqualify them from completing the FAFSA as independent students if they are homeless and unaccompanied, or self-supporting, unaccompanied and at risk of homelessness when they complete the FAFSA.

**Q: We have a very unsupportive environment for unaccompanied youth in our state. We just had a discussion about this and at one point our Superintendent was going to require all districts that identified youth who were homeless and unaccompanied to file abuse and neglect reports even though being homeless and unaccompanied is not in and of itself a reason to report. Any advice how to juggle a state that has no protections or supports for**

**unaccompanied homeless youth and reports to child welfare? That will push many underground. Thanks.**

A: Reporting all unaccompanied youth to child welfare as a matter of course would violate the McKinney-Vento Act, as it would create a barrier to identification, enrollment and retention in school. As a federal law, this supersedes state requirements. Contacting child welfare about a particular youth on a case-by-case basis may be necessary. However, a blanket policy would violate the McKinney-Vento Act because, as you said, it would "push students underground," making it impossible for schools to identify and serve them, and forcing some students out of school.

**Q: When we say youth, are we talking about under 18 only?**

A: No. The Application and Verification Guide defines youth as a student under 22 years old. However, the July 29, 2015 Dear Colleague Letter states: "Applicants who are between the ages of 21 and 24 and who are unaccompanied and homeless or self-supporting and at risk of being homeless qualify for a homeless youth determination, and will be considered independent students." Therefore, for the FAFSA, we are looking at "youth" under age 24.

The definition of "youth" will be completely removed from the 2018-19 FAFSA to eliminate confusion and barriers.

**Q: What verification can be used to support an unaccompanied student's independent status?**

A: There are four specifically-named verification sources, that include McKinney-Vento homeless liaisons; RHYA shelter directors or designees; HUD shelter directors or designees, and financial aid administrators.

In addition, "recognized third parties" can provide helpful information. Those third parties include: private or publicly-funded homeless shelters and service providers; financial aid administrators from another college; college access programs such as TRIO and GEAR UP; college or high school counselors; other mental health professionals; social workers; mentors; doctors; and clergy. These third parties do not have the statutory authority to make a determination of homelessness. However, they can provide "relevant information" to financial aid administrators who are making a determination of unaccompanied homeless youth status in the absence of a statutory determination.

**Q: If someone was determined to be homeless unaccompanied youth by school liaison in 2015 and fills that out on FAFSA for several years but is now 22, does that person have to go through the financial aid administrators? Does it matter that they are now in more stable housing?**

A: The student will need a new determination each year. Legislation has been introduced that would not require re-verification each year. However, that is not current law.

**Q: What is an "eligible noncitizen"?**

A: The complete list of eligible noncitizen categories is available in the Federal Student Aid Handbook (<https://ifap.ed.gov/ifap/byAwardYear.jsp?type=fsahandbook&awardyear=2017-2018>) Volume 1, Chapter 2.

**Q: Does a student have to have income to support their child to be considered independent?**

A: No. The ability to support the child is relevant for the purposes of being considered independent.

**Q: I have an unusual scenario. I work at an RHY funded shelter. I have an unaccompanied youth, US citizen, age 18 wishing to study abroad. Are there other forms she would need to complete to apply for aid?**

A: There are foreign institutions that participate in federal student aid, but there aren't many and by law a foreign school can participate in the Direct Loan Program if it is comparable to an institution of higher education in the United States and has been approved by the Department. The regulations give specific requirements. I'm not the subject matter expert in the area of foreign school eligibility, but I know that we have more information about foreign school eligibility at <http://ifap.ed.gov/ForeignSchoolInfo/> ForeignSchoolInfo.html.

We also have a list of approved foreign schools here <https://studentaid.ed.gov/sa/prepare-for-college/choosing-schools/types/international#participating-schools> . I'm not sure which, if any, are in Romania.

Again, the only student aid eligibility an otherwise federal student aid eligible student would have access to at a foreign school is federal student loans (Direct loans), and as you might assume, the annual loan limits may be an issue for the student.

**Q: I'm a financial aid officer with 25+ years; you mentioned there's a "more complicated presentation for aid officers" and am wondering where/when you do that presentation or if it's archived somewhere?**

A: The latest homeless youth presentation for financial aid administrators is available via a recording from the Federal Student Aid Conference on the conference website at <http://fsaconferences.ed.gov/2016sessions.html>