SchoolHouse
Connection

FAFSA & HOMELESS YOUTH:

CHALLENGES + RECOMMENDATIONS IN THE COVID-19 ERA

Prepared by SchoolHouse Connection

EXECUTIVE SUMMARY

Homelessness among college students is a diverse phenomenon, encompassing different age groups, family compositions, causes, and dynamics. Youth under age 24 who experience homelessness on their own - "unaccompanied homeless youth" - are a distinct subset of college students who face unique challenges in pursuing higher education. Lack of family and other support, often coupled with histories of neglect, abuse, trauma, mobility, and deep poverty, create roadblocks to their path to and through post-secondary education. Youth of color are more likely to experience homelessness than white youth, underscoring inequities across systems. LGBTQ youth also are more likely to experience homelessness, and face additional barriers.

One of the most significant barriers to higher education for youth experiencing homelessness is accessing financial aid; without financial aid, they cannot transition to and complete their college education, and remain at higher risk of continued homelessness as adults.

This report examines six years of financial aid data for unaccompanied homeless youth (UHY). These data demonstrate continued barriers to financial aid access - barriers that have been exacerbated by the COVID-19 outbreak. Our analysis finds that:

6 YEARS OF FINANCIAL AID DATA EXAMINED

1. The number of Free Application for Federal Student Aid (FAFSA) applicants who were determined to be unaccompanied homeless youth increased by 38% over the past six years. Nearly three quarters (73.5%) of this increase occurred between the 2016-2017 and 2018-2019 academic years, after enactment and implementation of amendments to federal K-12 education law to improve homeless youth's access to financial aid.

2. The number of UHY determinations made by local educational agency homeless liaisons and financial aid administrators increased significantly over the past six years (58% and 128% respectively), while the number of determinations made by homeless service providers did not.

3. From 2016-2018, the number of unaccompanied homeless youth FAFSA determinations increased for each entity that is authorized to make determinations, except for financial aid administrators, who made fewer determinations.

4. Determinations made by financial aid administrators continue to comprise a very small portion (7%) of the overall number of UHY FAFSA determinations.

5. There is great variation among states in six-year trends and two-year trends, with most states showing increases, but some states showing negligible changes or even decreases.

COVID-19 FAFSA CHALLENGES

Although the U.S. Department of Education has not yet released data that would indicate the impact of the COVID-19 pandemic on FAFSA determinations for unaccompanied homeless youth, general FAFSA data indicates that FAFSA completion is down 4 percent among all high school students, but down by nearly 6 percent among students attending high-poverty high schools. [1]

Through our direct experience supporting young people in our Youth Leadership & Scholarship program, as well as assisting local educational agency homeless liaisons and service providers, we have witnessed additional FAFSA barriers during the pandemic. These additional barriers include new and exacerbated documentation, outreach, and communication challenges. The fact that one in five institutions require students to complete the FAFSA to be eligible for emergency assistance places an additional hurdle before homeless youth at a time of great need. [2]

POLICY, PRACTICE, AND PHILANTHROPY RECOMMENDATIONS TO REMOVE BARRIERS TO FINANCIAL AID FOR UNACCOMPANIED HOMELESS YOUTH

To remove barriers to financial aid for unaccompanied homeless youth, particularly during COVID-19, we recommend policy changes at the federal and state level, as well as improved practices for K-12 schools, institutions of higher education, and homeless service providers, including:
- Streamlining and removing barriers to financial aid for unaccompanied homeless youth in the Higher Education Act through amendments in the Higher Education Access and Success for Homeless and Foster Youth Act, (S.789/H.R.1724).
- Passing state laws to designate higher education liaisons to improve access to financial aid.
- Improving federal oversight by the U.S. Department of Education, U.S. Department of Housing and Urban Development, and U.S. Department of Health and Human Services.
- Improving state oversight of local educational agencies.
- Increasing training for and collaboration between financial aid administrators, local educational agency homeless liaisons, and homeless service providers.

A CONCERTED EFFORT IS NEEDED AT EVERY LEVEL -- IN POLICY AND IN PRACTICE, AND SUPPORTED BY PHILANTHROPY -- TO ENSURE THAT YOUTH EXPERIENCING HOMELESSNESS RECEIVE FINANCIAL AID AND ARE ABLE TO COMPLETE POSTSECONDARY EDUCATION, OBTAIN LIVING WAGE EMPLOYMENT, AND AVOID HOMELESSNESS FOR THEMSELVES AND THEIR CHILDREN IN THE FUTURE.
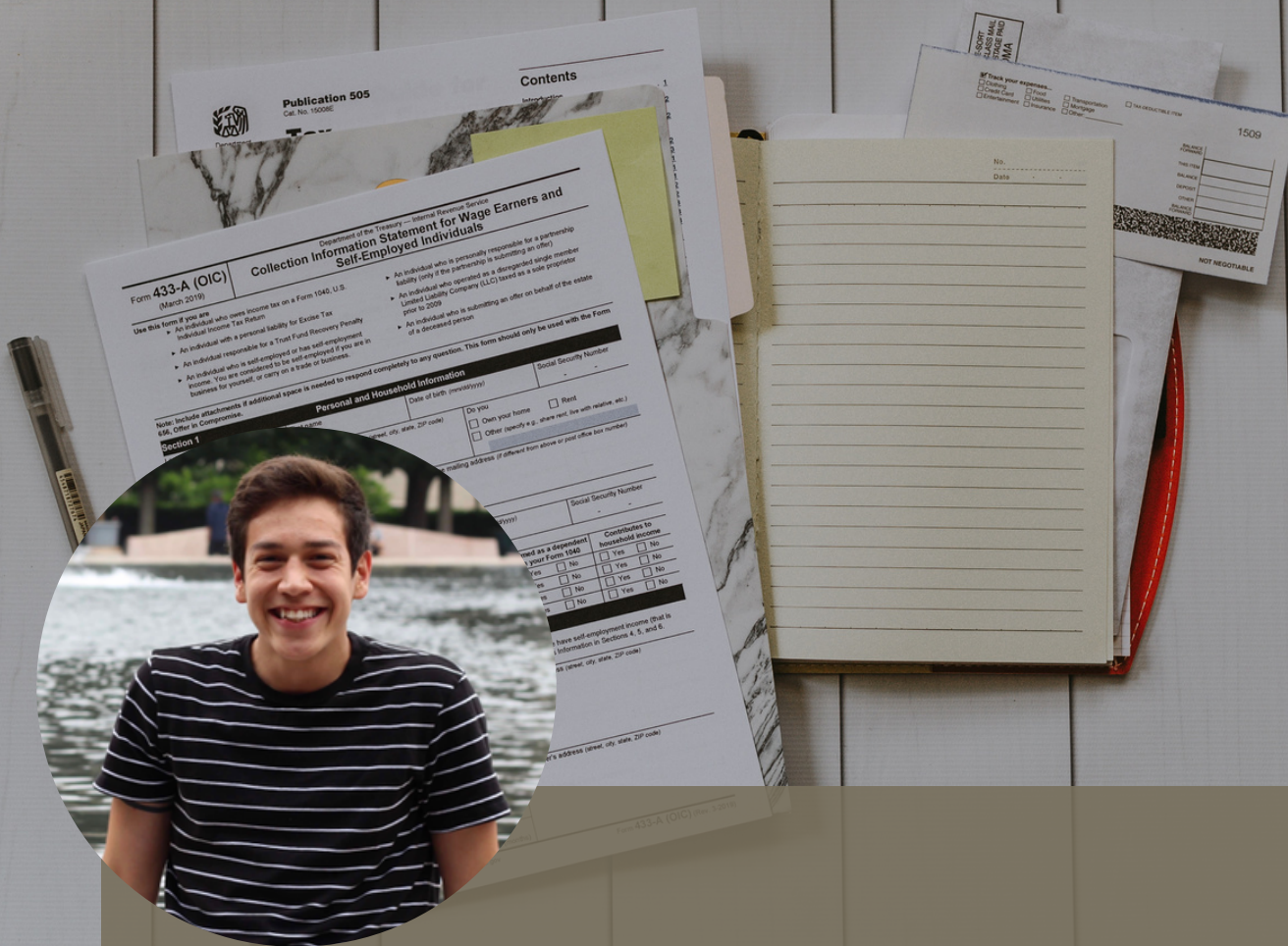
"Financial aid for unaccompanied homeless youth can be really tricky with all the forms and verifications needed to receive your aid. It's even more difficult now that COVID-19 makes it so that you can't go in person to the financial aid office. I struggled just recently with the financial aid office wanting a notarized form, but I had no way of getting it during the pandemic. Communicating over email is also hard and I found that it made the process much longer. I think during this pandemic it's going to be really important that financial aid offices reach out to students and support them while also making changes to documentation requirements to make the process easily doable for students."
- Danny, SHC Scholar

INTRODUCTION

Homelessness among college students is a diverse phenomenon, encompassing different age groups, family compositions, causes, and dynamics. Youth under age 24 who experience homelessness on their own - "unaccompanied homeless youth" - are a distinct subset of college students who face unique challenges in pursuing higher education. Lack of family and other support, often coupled with histories of neglect, abuse, trauma, mobility, and deep poverty, create roadblocks to their path to and through post-secondary education.

Prior to the COVID-19 outbreak in March 2020, about 4.2 million youth and young adults experienced homelessness on their own each year, with rates of unaccompanied youth homelessness similar in rural, suburban and urban areas. [3] Youth of color are more likely to experience homelessness than white youth. In high school, Black students are 2.67 times more likely to experience homelessness, and Hispanic students are 1.68 times more likely to experience homelessness, than their white peers. [4] LGBQ high school students are 2.94 times more likely to experience homelessness than heterosexual high school students. [5] A February 2020 national survey of two- and four-year college students found that among racial and ethnic groups, American Indian, Alaskan Native, and Black students have the highest rates of homelessness, followed by Pacific Islander or Native Hawaiian students. [6]

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. A June 2020 national survey found that 11% of students at two-year institutions and almost 15% at four-year institutions were experiencing homelessness due to the pandemic. [7] The report also found significant disparities in the pandemic's impact on college students' basic needs, with the highest rates of homelessness among Indigenous, Black, and Pacific Islander/Native Hawaiian students. Yet despite the economic crisis caused by the pandemic, some form of higher education remains the best long-term opportunity for young people to achieve economic independence, health, stability, and well-being.

Under the Higher Education Act, youth who are under age 24 generally are considered "dependent students," meaning they must provide parental income information and a parental signature in order to be considered for federal financial aid. However, unaccompanied youth experiencing homelessness are not living with, or supported by, a parent or guardian, and cannot obtain parental income information. To address this barrier, the Higher Education Act specifies that unaccompanied homeless youth are considered "independent students" for the purposes of financial aid.

Unaccompanied homeless youth status must be determined each year in which the student is submitting the application, by statutorily-specified federal program designees: local educational agency homeless liaisons; directors or designees of Runaway and Homeless Youth Act (RHYA) programs; directors or designees of Housing and Urban Development (HUD) Homeless Assistance programs; or financial aid administrators. [8]

> "I am a junior at the University of West Georgia and I am currently having great difficulty with verifying my FAFSA....I have no idea if you can assist me. You are my last resource before my July 1st deadline. I am likely going to lose my financial aid if I can't figure out what to do."
> - Elizabeth Hanniford, Student reaching out to SchoolHouse Connection for help end of June 2020 before the FAFSA was due.

While the policy of treating unaccompanied homeless youth as independent students has led to some improvements in their access to financial aid, these youth continue to face difficulties. In 2016, the Government Accountability Office (GAO) found that burdensome financial aid rules can hinder the ability of youth experiencing homelessness to access federal aid. [9] In particular, the GAO found that extensive documentation requests can impede access to aid for homeless youth, as family conflict, limited time, and the stigma of homelessness frequently complicate the process of attaining required documents. Compounding these burdens, the required annual redetermination of homelessness forces youth to endure this often traumatic process repeatedly.

The COVID-19 crisis and school closures have exacerbated all of these challenges, making it more difficult for youth to obtain financial aid and persist in their college education. The U.S. Department of Education (ED) has acknowledged some of the FAFSA challenges experienced by unaccompanied homeless youth during the pandemic, specifically obtaining IRS Verification of Non-Filing and IRS Form W-2s. [10]

# FEDERAL FAFSA DATA ON UNACCOMPANIED HOMELESS YOUTH

Application Cycle	Applicants Determined to be Unaccompanied Homeless Youth Source: U.S. Department of Education, https://nche.ed.gov/ibt/fafsa.php				
	Agency Determined (as self-reported on FAFSA)			School Financial Aid Administrator Determinant	Sum
	High School or School District	HUD Program	Youth or Transitional Program		
2013-2014	18,214	4,430	5,686	1,382	29,712
2014-2015	22,438	4,156	3,872	1,739	32,205
2015-2016	22,435	3,822	3,506	2,185	31,948
2016-2017	23,053	3,571	3,323	2,792	32,739
2017-2018	26,181	3,706	3,448	3,251	36,586
2018-2019	28,929	4,474	4,624	3,123	41,150

The chart above summarizes available data on FAFSA applicants determined to be unaccompanied homeless youth, and the source of the determination. It is important to note that these data are not representative of the entire population of FAFSA applicants experiencing homelessness and should not be construed to represent the total number of homeless youth, or unaccompanied homeless youth, in college. They do, however, reveal a number of significant trends. [11]

FEDERAL FAFSA DATA ON UNACCOMPANIED HOMELESS YOUTH

1. **The number of Free Application for Federal Student Aid (FAFSA) applicants who were determined to be unaccompanied homeless youth over the past six years increased by 38%. Nearly three quarters (73.5%) of this increase occurred in the 2016-2017 through 2018-2019 academic years, after enactment and implementation of amendments to federal K-12 education law to inform youth of their independent student status and assist them to obtain documentation for the FAFSA.**
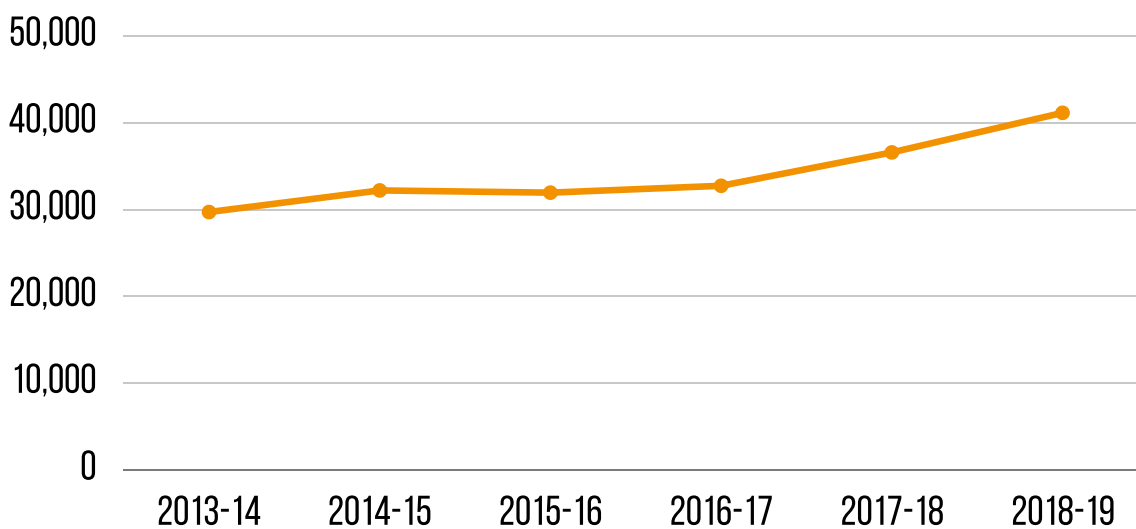
The Every Student Succeeds Act (ESSA) made important amendments to the McKinney-Vento Act's Education for Homeless Children and Youths Program to help youth experiencing homelessness transition successfully from high school to postsecondary education. Local educational agency homeless liaisons are now required to ensure that unaccompanied homeless youth are informed of their status as independent students for college financial aid and obtain assistance to receive verification for the FAFSA. Additionally, state McKinney-Vento plans must describe how homeless youth will receive assistance from school counselors to advise and prepare them, and improve their readiness for college. These amendments went into effect on October 1, 2016.

While the data do not allow us to draw conclusions about the cause of the increase in UHY FAFSA determinations, they do show that the vast majority of the increase in the overall number of UHY FAFSA determinations occurred after 2016, and is thus correlated with the early implementation of the McKinney-Vento Act amendments.

FEDERAL FAFSA DATA ON UNACCOMPANIED HOMELESS YOUTH

2. **The number of UHY determinations made by local educational agency homeless liaisons and financial aid administrators increased significantly over the past six years (58% and 128% respectively), while the number of determinations made by homeless service providers did not.**

A review of UHY FAFSA determinations categorized by authorized entity reveals the following trends over the past six academic years for which there is data:

- Financial aid administrator determinations increased by 128%, but still lagged far behind determinations made by other authorized entities.
- Local educational agency homeless liaison determinations increased by 58%.
- U.S. Department of Housing and Urban Development homeless program determinations increased by less than 1%.
- Runaway and Homeless Youth Act (RHYA) program determinations decreased by 19%.

While the overall number of UHY determinations by these homeless service providers has increased over the past two years, the aggregate six-year data do not show an increase in the number of young people in HUD and RHYA programs who are informed about, and assisted to obtain, the documentation they need to access financial aid. This is particularly troubling in light of the fact that there is no indication that youth homelessness has decreased over this time period, nor has federal funding been cut for these programs. In fact, Congress has provided more funding to HUD homeless assistance programs to serve unaccompanied homeless youth over the past six years, including through Youth Homelessness Demonstration Programs. What, then, explains the lagging UHY determinations by HUD and RYHA programs? While we cannot be certain, it is possible that evolving programmatic incentives account for some or much of the trend. In particular, we are concerned that the low numbers of UHY FAFSA determinations by homeless programs may reflect incentives to move youth out of shelter and into housing as quickly as possible, without regard to what youth need to be able to sustain housing, including the education that is necessary to obtain higher-paying employment.

FEDERAL FAFSA DATA ON UNACCOMPANIED HOMELESS YOUTH

The pandemic has complicated service provision. Currently, homeless service providers in both federal programs are faced with tremendous challenges in responding to COVID-19 - they must adapt programs to meet social distancing and other health requirements while responding to increasing demand due to the economic crisis and family stress. Yet in light of the long-term economic imperative for some form of postsecondary education, these programs should, at a minimum, be expected to inform youth of their status as independent students, and assist them to obtain determinations should youth choose to pursue their education. To this end, we were heartened to see the FAFSA training initiated by the Family and Youth Services Bureau for RHYA grantees in September 2020.

As described in our recommendations below, both HUD and HHS should take specific action to increase the number unaccompanied homeless youth who receive FAFSA determinations.

FEDERAL FAFSA DATA ON UNACCOMPANIED HOMELESS YOUTH

3. **From 2016-2018, the number of unaccompanied homeless youth FAFSA determinations increased for each entity that is authorized to make determinations, <u>except</u> for financial aid administrators, who made fewer determinations.**

After years of advocacy, including from Members of Congress, the U.S. Department of Education announced that the 2018-2019 FAFSA would remove the definition of "youth" from the FAFSA. Previous versions of the FAFSA had defined "youth" as a person aged 21 or under, forcing 22- and 23-year-old unaccompanied homeless youth to submit extensive and burdensome documentation to prove their homelessness until they were no longer considered "dependent" at age 24. In our 2018 report, we anticipated that this change would simplify the financial aid application and determination processes for many unaccompanied youth, and therefore that the number of UHY FAFSA determinations would increase. [12] While determinations made by local educational agency liaisons, HUD homeless programs, and RHYA programs did increase from 2016-2018, determinations made by financial aid administrators decreased by 4%.

While the data do not explain the reasons for the decline in UHY FAFSA determinations made by financial aid administrators, our direct experience with young people and financial aid administrators indicates that financial aid administrators continue to be reluctant to make UHY FAFSA determinations. We continue to witness incidents where financial aid administrators either ask youth to obtain documentation from other authorized parties, or steer homeless youth to a professional judgment process that essentially bases their access to financial aid up on the subjective discretion of financial aid administrators, rather than on whether or not youth meet the legal definition of unaccompanied homeless youth. Some financial aid administrators may encourage homeless youth to pursue professional judgment as a route to independent student status after their first year of college in order to avoid subsequent year UHY determination, underscoring the need to eliminate this burdensome requirement in future legislation. These well-intentioned efforts notwithstanding, we also repeatedly witness inappropriate documentation requests, inappropriate and unnecessary routing to professional judgement, and burdensome procedures. We have observed these dynamics consistently over the past decade, despite clear <u>guidance from the U.S. Department of Education (ED)</u> indicating that UHY FAFSA determinations are not exercises of professional judgment, and that financial aid administrators must make determinations based on the legal definitions. These barriers also persist despite training for financial aid administrators conducted jointly with ED and with the National Association of Student Financial Aid Administrators.

The reluctance of financial aid administrators to make UHY FAFSA determinations creates tremendous barriers for some of our most marginalized young people. To understand the significance and scale of these barriers, consider that most youth experiencing homelessness do not stay in shelters due to lack of shelter availability or limited capacity, and thus are not able to obtain verifications from HUD or RHYA providers. Moreover, only younger students who are transitioning from high school to postsecondary education are likely to have determinations from high schools or school districts. This means that financial aid administrators are often the only parties who are able to make determinations for the vast majority of unaccompanied homeless youth. It would be expected that, of all the parties authorized to make youth homelessness determinations, financial aid administrators would make the greatest number of determinations, not the fewest. The role of financial aid administrators in making UHY determinations takes on even greater significance during the pandemic, as homeless programs may have reduced capacity due to social distancing and youth fear seeking shelter due to the virus.

As described in our recommendations below, these data indicate the need to improve federal oversight, increase training for financial aid administrators on the needs and circumstances of homeless youth, and amend federal and state laws to remove barriers.

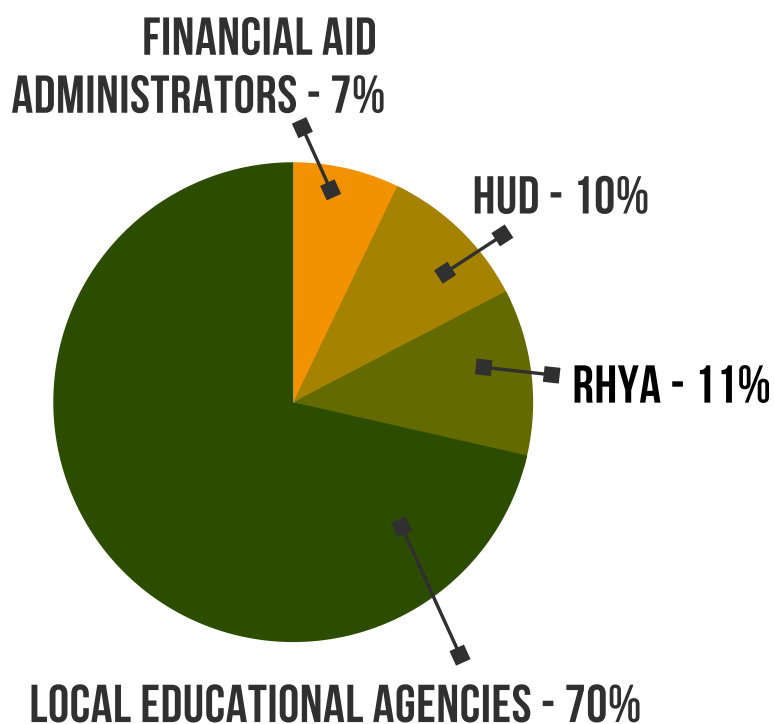# FEDERAL FAFSA DATA ON UNACCOMPANIED HOMELESS YOUTH

4. Determinations made by financial aid administrators continue to comprise a small portion of the overall number of UHY FAFSA determinations.

In 2018-2019:

- Financial aid administrator determinations accounted for only 7% of all UHY determinations.
- U.S. Department of Housing and Urban Development homeless program determinations accounted for 10% of all UHY determinations.
- Local educational agency homeless liaison determinations accounted for 70% of all UHY determinations.
- Runaway and Homeless Youth Act (RHYA) program determinations accounted for 11% of all UHY determinations.

In light of the declining number of UHY FAFSA determinations by financial aid administrators discussed in the preceding section, it is not surprising—although it is discouraging—that financial aid administrator determinations continue to comprise a small portion of the overall number of UHY FAFSA determinations.

FINANCIAL AID ADMINISTRATORS - 7%

HUD - 10%

RHYA - 11%

LOCAL EDUCATIONAL AGENCIES - 70%

As noted above, it would be expected that financial aid administrators would make the greatest number of determinations, rather than the fewest. Therefore, this trend of under-performance by financial aid administrators is disturbing and reflects the likelihood that there is significant unmet need and continuing barriers, especially among older unaccompanied homeless youth.

FEDERAL FAFSA DATA ON UNACCOMPANIED HOMELESS YOUTH

5. There is great variation among states in six-year trends and two-year trends, with most states showing increases, but some states showing negligible changes or even decreases.

Over the six-year period from 2013-2018, the number of FAFSA applicants determined to be unaccompanied homeless youth increased in 48 states and the District of Columbia, but decreased in three states (AK, HI, RI). Thirteen states (AR, CA, FL, GA, KY, LA, MD, MS, ND, OK, TN, TX, WV) had increases of more than 50%. Three states (MT, UT, WY) had increases of more than 100%.

OVER 6 YEARS

MT, UT, WY

These three states had increases of more than 100%.

Over the two-year period from 2016-2018, the number of FAFSA applicants determined to be unaccompanied homeless youth increased in 49 states and the District of Columbia and decreased in two states (AK, VA). Six states (AZ, CA, MT, NH, ND, WY) had increases of more than 40%.

## OVER 2 YEARS

AZ, CA, MT NH, ND, WY

These six states had increases of more than 40%.

"I am getting a lot of calls for help from students who are being given "a hard time" (for lack of a better term) around verification of unaccompanied status after their first year. I am working to educate my liaisons that they can write subsequent year verifications if they feel they have the information to do so, but many are not comfortable they didn't know the student (i.e. the liaison has changed). The number of calls I have received from very stressed students trying to get a second- or third-year verification are more than any other year."

-Susanne Terry, San Diego County Office Homeless Liaison

AGENCY DETERMINATIONS OF UNACCOMPANIED HOMELESS YOUTH FAFSA APPLICANTS, 2013-2018

Changes from 2013-2014 to 2018-2019

- Less than 0%
- 0% - 50%
- 51% - 100%
- More than 100%
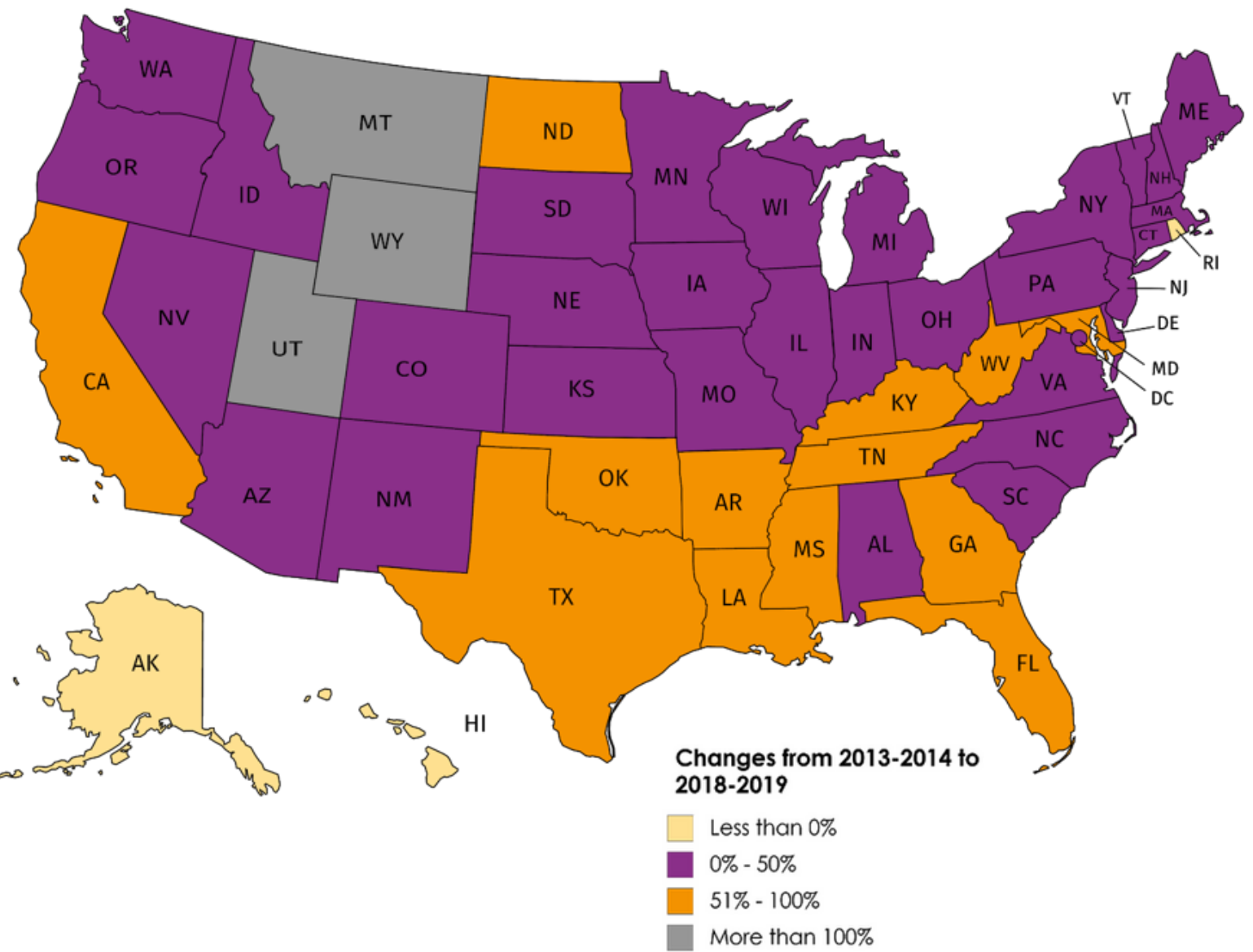
AGENCY DETERMINATIONS OF UNACCOMPANIED HOMELESS YOUTH FAFSA APPLICANTS, 2016-2018 (POST-ESSA AMENDMENTS TO THE MCKINNEY-VENTO ACT)

Changes from 2016-2017 to 2018-2019

- Less than 0%
- 0% - 20%
- 21% - 40%
- More than 40%
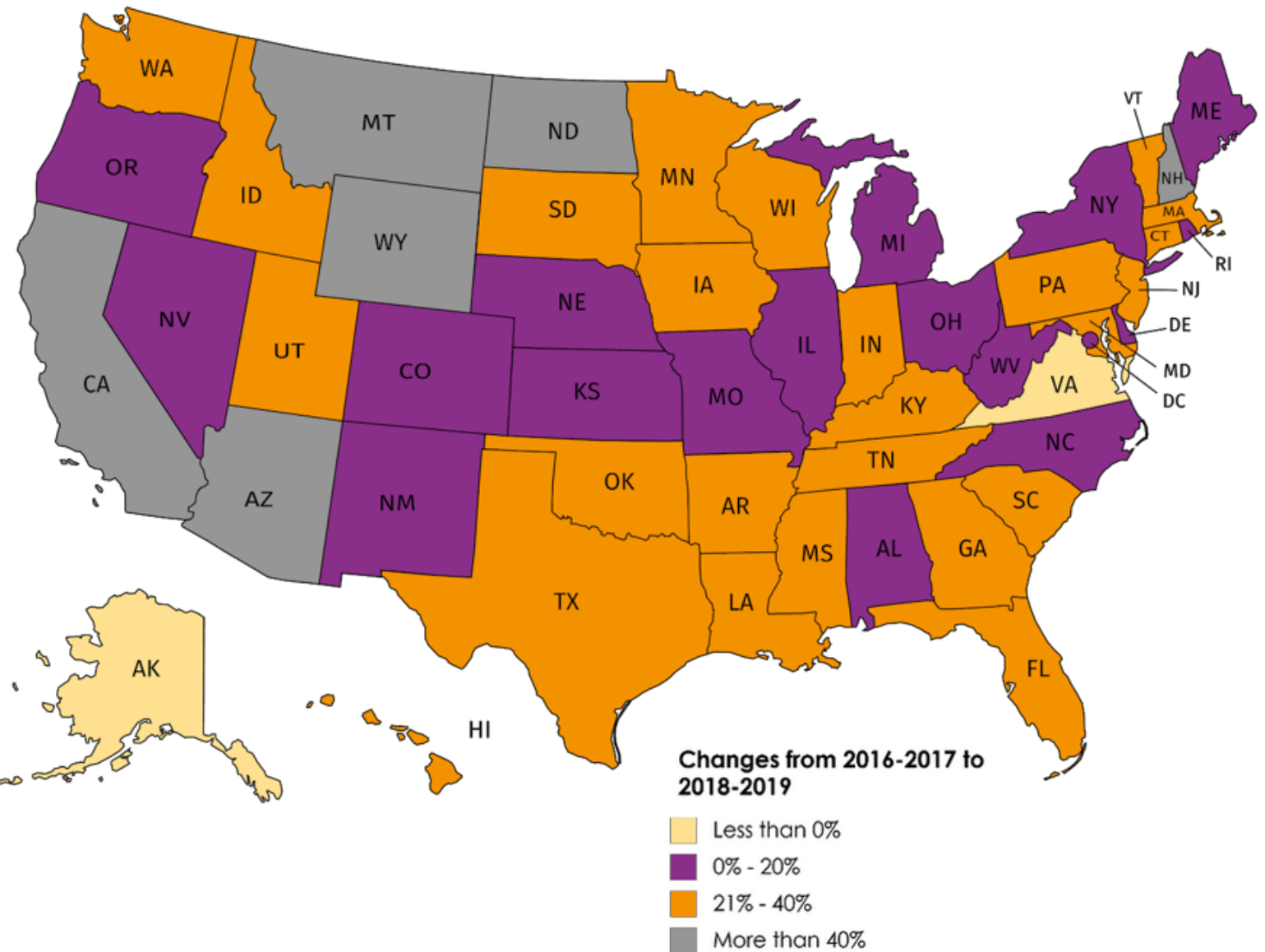
COVID-19 FAFSA CHALLENGES

"Financial Aid for Unaccompanied Homeless Youth is tricky in the first place, and COVID has only made it worse. For months, I struggled to get a determination letter and many other documents for my University after COVID caused us to move to distance learning. I had to wait long periods of time between email responses and it felt like it was a fight I was never going to win. With my college being closed as well, this made it more challenging to communicate with the financial aid office as I was trying to get my letter to them. Thankfully I was able to finally get a phone call and that was much more productive than long confusing email threads. I think as COVID is causing changes for this coming school year, it's going to be really important for schools and financial aid offices to reach out to students who they think may be unaccompanied homeless youth. I also think that reaching out should be done in a variety of ways depending on the student's needs. Schools should be willing to move away from only using email and consider calling students or sending them automated texts, things like that. Ask the student what is best for them and do your best to reach out regularly to help them complete their financial aid."
- Ash, SHC Scholar

COVID-19 FAFSA CHALLENGES

Although the U.S. Department of Education has not yet released data that would indicate the impact of the COVID-19 pandemic on FAFSA determinations for unaccompanied homeless youth, general FAFSA data indicates that FAFSA completion is down 4 percent among all high school students, but down by nearly 6 percent among students attending high-poverty high schools. [13]

Through our direct experience supporting young people in our Youth Leadership & Scholarship program, as well as assisting local educational agency homeless liaisons and service providers, we have witnessed additional FAFSA barriers during the pandemic. Specific barriers include:

- Some students and staff have not had access to printers during the pandemic, and therefore could not print or sign printed documents, yet some financial aid offices would not accept unsigned (electronic) letters.
- High school students have had challenges contacting their local educational agency homeless liaison due to campus closures; as a result, they have experienced long wait times between emails.
- Institutions have sent lengthy and confusing emails about financial aid to students during the pandemic, and not provided intentional outreach, or an option for contacting the financial aid administrator in a timely manner, which further delayed the FAFSA application process.
- Some institutions have required students to provide a personal statement detailing their homeless experience and requesting that it be notarized, or required a notarized form from homeless service providers in order for providers to speak to the financial aid office on the student's behalf. Requiring letters or forms to be notarized is always a barrier, but is especially daunting during the pandemic.

The fact that one in five institutions require students to complete the FAFSA to be eligible for emergency assistance places an additional hurdle before homeless youth at a time of great need. [14]

POLICY, PRACTICE, AND PHILANTHROPY RECOMMENDATIONS TO REMOVE BARRIERS TO FINANCIAL AID FOR UNACCOMPANIED HOMELESS YOUTH

To remove barriers to financial aid for unaccompanied homeless youth, particularly during COVID-19, we recommend policy changes at the federal and state level, as well as improved practices for K-12 schools, institutions of higher education, and homeless service providers. We also provide suggestions for philanthropy to support FAFSA completion and postsecondary access and success for youth experiencing homelessnses.

> "I would like there to be a homeless liaison for college students. Especially when it comes to filling out the FAFSA. For my peers, it takes them maybe an hour to fill out the FAFSA. For me, it can take anywhere from a week to three weeks, because of all the information I have to gather."
> - Han Johnson, NN4Y National Youth Advisory Council Member, UT, Congressional Briefing on the Impact of COVID-19 on Youth Homelessness, July 14, 2020

POLICY RECOMMENDATIONS

Congress should:
- Require institutions to conduct outreach to and prioritize unaccompanied homeless youth for any emergency financial aid that is included in any final coronavirus relief legislation.
- Amend the Higher Education Act to streamline and remove barriers to financial aid for unaccompanied homeless youth by passing the Higher Education Access and Success for Homeless and Foster Youth Act, (S.789/H.R.1724). This legislation streamlines the FAFSA questions for homeless unaccompanied youth and foster youth, eases the verification and determination process, and requires institutions to designate a higher education liaison.

State legislatures should:

- Enact policies requiring institutions to designate higher education homeless liaisons to assist youth to access financial aid and other supports. For example, state laws in California, Louisiana, Maine, Nevada, and Tennessee establish liaisons for youth experiencing homelessness to inform and assist youth with financial aid. Other states have amended their housing, enrollment, or tuition policies to prioritize students experiencing homelessness. [15]

- Consider broader policies such as requiring students to complete the FAFSA in order to graduate from high school. Louisiana, Texas, and Illinois have state laws that require high school seniors to complete the FAFSA in order to graduate. With implementation of this requirement, we expect that more unaccompanied homeless youth will fill out the FAFSA and in turn, pursue a postsecondary education. Congress and/or the U.S. Department of Education could require or incentivize states to adopt similar policies.

- Consider legislation to address Satisfactory Academic Progress (SAP) appeals and homelessness. SAP must be maintained in order to continue receiving federal student aid, but homelessness can lead to academic problems, jeopardizing students' aid. In California, AB 2416 [16] would require colleges to consider homelessness as an extenuating circumstance when reviewing appeals of loss of financial aid. As of September 2020, the legislation had passed the legislature and is on the Governor's desk.

The U.S. Department of Education should:
- Update and reissue its 2015 Dear Colleague Letter to financial aid administrators reminding them of their responsibilities to make FAFSA determinations for unaccompanied homeless youth.
- Monitor institutions of higher education to ensure that their financial aid procedures do not create barriers for unaccompanied homeless youth, and that unaccompanied homeless youth are not wrongfully denied aid.
- Monitor the training provided by state educational agencies to local educational agency homeless liaisons to ensure that it includes information about unaccompanied homeless youth and the FAFSA, as well as state procedures to ensure that counselors are advising and preparing homeless youth for college.

The U.S. Department of Housing and Urban Development should:
- Require HUD homeless programs to inform all unaccompanied youth of their status as independent students on the FAFSA and provide youth with determinations so that they may pursue postsecondary education if they wish.
- Add points to the Notice of Funding Availability for plans to address youth homelessness that include FAFSA outreach and assistance.

The U.S. Department of Health and Human Services should:
- Require RHYA programs to inform all youth of their status as independent students on the FAFSA and provide youth with determinations so that they may pursue postsecondary education if they wish.
- Require applications for RHYA funding to address how youth will be informed of their status on the FAFSA and provided with determinations.

PRACTICE RECOMMENDATIONS

To improve implementation of existing higher education policies for homeless youth, we recommend the following practices.

State educational agencies

- Prioritize homeless youth for K-12 and higher education coronavirus relief funding.
- Monitor local educational agencies to ensure that schools and school districts are complying with the requirement to inform homeless youth of their status as independent students and providing determinations.
- Include specific information on unaccompanied homeless youth and the FAFSA in the training and professional development for local educational agency homeless liaisons that is mandated under the McKinney-Vento Act.
- Facilitate virtual or other convenings of local educational agency homeless liaisons and their counterparts in higher education to develop cross-system relationships and facilitate FAFSA problem-solving. For example, Georgia's EMBARK network [17] is a statewide network of support for youth who have experienced foster care or homelessness that meets on a regular basis.
- Provide training and information about unaccompanied homeless youth and the FAFSA barriers they face to state higher education departments and agencies, college access organizations, and institutions of higher education.
- Track the number and origin of questions and disputes regarding unaccompanied homeless youth and the FAFSA in order to assess where training and monitoring efforts should be adjusted and/or increased.

Local educational agencies

- Develop protocols to ensure compliance and full implementation of the McKinney-Vento Act requirement that youth be informed of their status as independent students for financial aid on the FAFSA and provided with determinations.
- Provide training and professional development for counselors and other school personnel on how to identify unaccompanied homeless youth and assist them with determinations for the FAFSA.
- Ensure that unaccompanied homeless youth are still receiving their determination letters during the pandemic by emailing both students and their post-secondary institutions a copy of determinations for their records and also providing access to Wi-Fi or devices necessary for college applications and filling out the FAFSA. [18]
- Develop relationships with and train area institutions of higher education, college access programs, and homeless service providers on unaccompanied homeless youth and FAFSA determinations.

Institutions of higher education

- Provide professional development and training to financial aid administrators on unaccompanied homeless youth and the FAFSA.
- Review financial aid procedures to ensure that financial aid administrators are aware of and following federal guidance [19], including making determinations based on the legal definitions, accepting determinations from authorized parties, and permitting a documented interview for youth who do not have and cannot obtain third-party determinations.
- Conduct outreach to and prioritize unaccompanied homeless youth for emergency financial aid.
- Develop relationships with local educational agency homeless liaisons and homeless service providers to streamline determinations and provide support.

Homeless service providers

- Inform youth of their status as independent students on the FAFSA and provide youth with determinations so that they may pursue postsecondary education if they wish.
- Develop relationships with institutions of higher education to streamline determinations and provide support.
- Homeless assistance programs that are not HUD or RHYA funded should provide youth with written documentation that they can provide to financial aid administrators.

"We invited a few Financial Aid office staff, including their director, to a shared learning webinar over a catered lunch. It was our way to build stronger relationships and shared language/understanding about dependency override procedures for homeless/brink of homeless students. It really has helped my office when referring students to the Financial Aid office and walking them through the proper processes using a trauma informed lens."
- Miguel, Basic Needs Coordinator, Oregon

PHILANTHROPY RECOMMENDATIONS

Philanthropy can continue supporting policy and practice strategies to increase FAFSA completion for youth experiencing homelessness, thereby helping to increase college access and retention for some of the most marginalized and vulnerable young people in our nation. Many organizations, advocates, and practitioners are already working hard towards this goal, but need more targeted support. Philanthropy might consider:

- Including youth experiencing homelessness in broader funding portfolio discussions and efforts to increase college access and retention of low-income students and students of color, including by prioritizing support for organizations, coalitions, and initiatives that:
  - Support homeless youth's participation in FAFSA completion events by considering the challenges of homelessness when planning such events, and by providing flexible funding so that organizations can provide transportation, wifi, mentors, devices, and other supports.
  - Reach out to and include local school district homeless liaisons and homeless youth service providers in stakeholder events and activities.
  - Providing communications support to organizations to elevate youth homelessness during FAFSA day events and completion activities.
- Supporting expanded efforts to increase college access and retention for youth in foster care to include youth experiencing homelessness. In light of the shared life experiences of homeless and foster youth, it makes sense to leverage and add capacity to existing efforts aimed at FAFSA completion for foster youth so that they also include homeless youth.
- Supporting targeted and tailored initiatives to track and increase support for FAFSA completion for homeless youth, such as local or state "FAFSA challenges" that engage high schools, school districts, institutions of higher education, and homeless service providers.

- Using the convening power of philanthropy to bring together voices from leading financial aid organizations, financial aid administrators, school district homeless liaisons, homeless service providers, and young people with lived experience for a conversation about what works, where there are still gaps, and to forge stronger relationships.
- Continuing support for federal and state policy advocacy to push for improvements to financial aid requirements and completion processes, higher education liaisons, and other supports.
- Supporting pilot sites, in partnership with college and university financial aid offices, to test strategies for identifying and supporting youth experiencing homelessness, and elevating best practices.
- Creating space to hear from young people experiencing homelessness internally during strategy sessions, funder meetings, conferences, and other convenings.

A CONCERTED EFFORT IS NEEDED AT EVERY LEVEL, IN POLICY AND IN PRACTICE, TO ENSURE THAT YOUTH EXPERIENCING HOMELESSNESS RECEIVE FINANCIAL AID AND ARE ABLE TO COMPLETE POSTSECONDARY EDUCATION, OBTAIN LIVING WAGE EMPLOYMENT, AND AVOID HOMELESSNESS FOR THEMSELVES AND THEIR CHILDREN INTO THE FUTURE.

> "As an unaccompanied homeless youth, financing my education is the challenge I have to face, but the financial aid officers at my university who are put in place to help students like me were the barriers that were stopping me. I reached out to the Financial Aid office desperately looking for help and even after a constant barrage of emails and phone calls, I was blatantly ignored. This pattern of dead ends went on for over a month and the first day of school was approaching. I was able to attend a financial aid orientation and I was able to ask questions there, but then I was blatantly ignored and had to follow up with them by sending them a barrage of emails once again. I reached out to SchoolHouse Connection for help; after that, financial aid did get back to me, and was able to help me secure my financial aid package for this semester. I'm officially on the road to getting my degree in Clinical Psychology and Neuroscience. It seems like a small step, but I consider it a big win. I think there needs to be reform in the financial aid offices at all schools, especially for homeless youth. But I'm just thankful that I get to go to school. SchoolHouse Connection helped me jump start the change I desperately needed in my life."
> - John Mark Flores, student reaching out to SchoolHouse Connection for help July 2020.

FAFSA FAQS

SchoolHouse Connection receives many emails and phone calls about the FAFSA from youth, liaisons, higher education professionals, and service providers. We advocate for students experiencing homelessness to access their financial aid, and provide answers to many "real life" questions in our searchable Q&A from Our Inbox. [20] Just search for "FAFSA" and you might find an answer to a question you may have. We also have an accompanying FAQ [21] document from our joint webinar with the National Association of Student Financial Aid Administrators (NASFAA) that are specific questions from financial aid administrators.
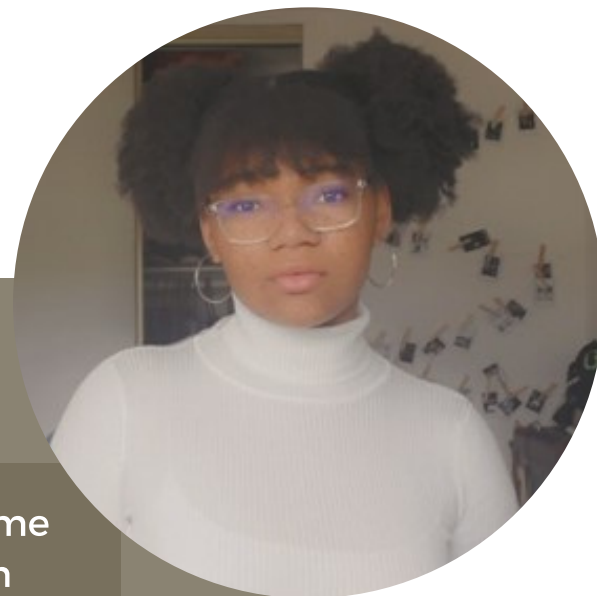
> "Higher education is really important to me because I was homeless my entire high school career. I was homeless with my family and my family is still currently homeless. The only reason I was able to stop being homeless was by going to college and pursuing my degree. I'm really passionate about it because I want to be able to maintain stability and eventually get stability for my family."
> - Destiny Dickerson, SHC Young Leader, San Diego State University, Congressional Briefing on the Impact of COVID-19 on Youth Homelessness, July 14, 2020

RESOURCES

Financial Aid for Youth Who are Homeless (or At Risk of Homelessness) and On Their Own
This resource contains a flowchart to help you see if you qualify as an independent student because you are an unaccompanied youth experiencing homelessness, or at risk of homelessness. It provides examples of who can make determinations of your status, as well as email templates.

The FAFSA: Four Things You Can Do to Help Homeless and Foster Youth
Whether you work in K-12, higher education, child welfare, or homeless services, the release of the new Free Application for Federal Student Aid (FAFSA) on October 1 is an important date. This brief provides concrete ways to help youth experiencing homelessness and youth from foster care, as well as practical resources.

Frequently Asked Questions from the National Association of Student Financial Aid Administrators (NASFAA) Removing Barriers and Increasing Access to Financial Aid for Unaccompanied Homeless Youth Webinar
On May 5, 2020, we held a webinar on removing barriers and increasing access to financial aid for unaccompanied homeless youth in partnership with NASFAA. This document contains the most frequently asked questions presented during the webinar. Answers have been provided by SchoolHouse Connection.

Sample Form Letters to Determine Independent Student Status of Unaccompanied Homeless Youth for the FAFSA
Federal law (the McKinney-Vento Act) requires school district homeless liaisons to inform unaccompanied homeless youth of their status as independent students for financial aid (the Free Application for Federal Student Aid, or FAFSA) and help them obtain verification of that status. To help implement this policy, we've prepared a sample form letter (Microsoft Word). This form letter may be edited as appropriate for your school district, institution of higher education, shelter, transitional living program, or street outreach program.
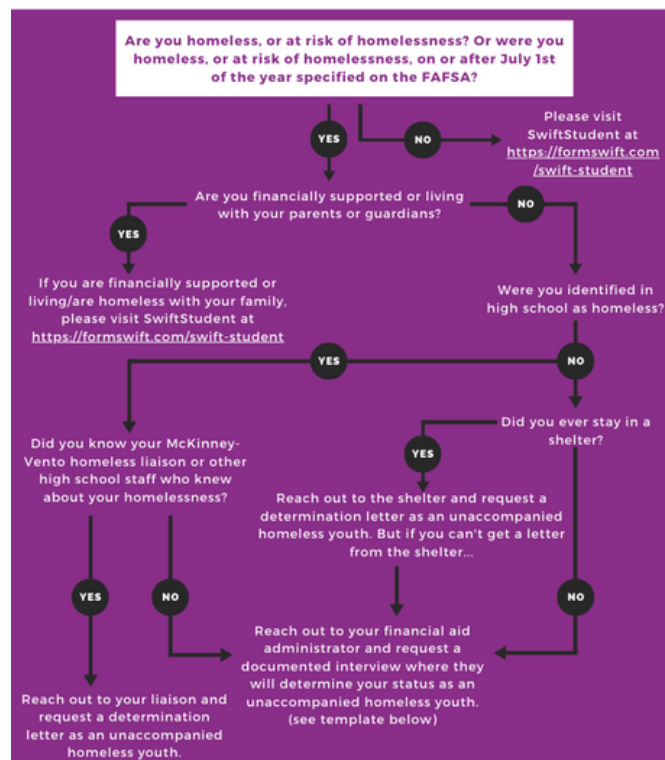
Tips for Preparing for an Independent Financial Aid Interview
This resource is designed to help unaccompanied homeless youth prepare for documented interviews with the financial aid administrator.

FOOTNOTES

[1] DeBaun, Bill. (2020). #FormYourFuture FAFSA Tracker. Washington, D.C.: National College Attainment Network. Available at: https://public.tableau.com/profile/bill.debaun.national.college.access.network#!/vizhome/COVID-19andFAFSACompletion/COVID-19FAFSA

[2] Kienzl, G., Goldrick-Rab, S., Conroy, E., et al. (2020). #RealCollege During the Pandemic: Initial Institutional Responses to Address Basic Needs Insecurity. Philadelphia, PA: The Hope Center. Available at: https://hope4college.com/wp-content/uploads/2020/09/COVID19_InstitutionSurvey.pdf

[3] Morton, M.H., Dworsky, A., Matjasko, J.L., et al. (2018). Missed Opportunities: Youth Homelessness in America. Chicago, IL: Chapin Hall. Available at: http://voicesofyouthcount.org/brief/national-estimates-of-youth-homelessness/

[4] SchoolHouse Connection. (2019). Student Homelessness: Lessons from the Youth Risk Behavior Survey: Racial and Ethnic Equity: Disproportionality and Action Steps for Schools. Washington, D.C.: SchoolHouse Connection. Available at: https://www.schoolhouseconnection.org/student-homelessness-lessons-from-the-youth-risk-behavior-survey-yrbs

[5] SchoolHouse Connection. (2019). Student Homelessness: Lessons from the Youth Risk Behavior Survey: Sexual Orientation Equity: Disproportionality and Action Steps for Schools. Washington, D.C.: SchoolHouse Connection. Available at: https://www.schoolhouseconnection.org/student-homelessness-lessons-from-the-youth-risk-behavior-survey-yrbs

[6] Baker-Smith, C., Coca, V., Golrick-Rab., S., et al. (2020). #RealCollege 2020: Five Years of Evidence on Campus Basic Needs Insecurity. Philadelphia, PA: The Hope Center. Available at: https://hope4college.com/wp-content/uploads/2020/02/2019_RealCollege_Survey_Report.pdf

[7] Goldrick-Rab, S., Coca, V., Kienzl, G., et al. (2020). #RealCollege During the Pandemic: New Evidence on Basic Needs Insecurity and Student Well-Being. Philadelphia, PA: The Hope Center. Available at: https://hope4college.com/wp-content/uploads/2020/06/Hopecenter_RealCollegeDuringthePandemic.pdf

[8] 20 USC §1087(v)(v)(d)(1)(H)

FOOTNOTES

[9] Arras-Emrey, M. (2016). Actions Needed to Improve Access to Federal Financial Assistance for Homeless and Foster Youth. Washington, D.C.: U.S. Government Accountability Office. Available at: https://www.gao.gov/products/GAO-16-343

[10] U.S. Department of Education. (2020). Reminder of Alternative Acceptable Documentation to Complete for IRS Verification of Non-Filing (VNF) and Form W-2; Increase in Professional Judgments due to COVID-19. Washington, DC.: U.S. Department of Education. Available at: https://ifap.ed.gov/electronic-announcements/070920AltAcceptDocCompleteIRSVNFW2ProfJudgmentCOVID

[11] The FAFSA does not collect information on the number of homeless students attending postsecondary institutions. It also collects no information on applicants experiencing homelessness who remain with their parents, or on students who become homeless after completing the FAFSA. The FAFSA data reflect only youth who self-identify as unaccompanied homeless youth at the time they complete the application. In addition, based on the priority of questions on the web-based FAFSA, the data collected on unaccompanied homeless youth exclude applicants who, when they completed the application, provided more than half of a dependent's support or were 24 years or older, married, in a graduate program, in active military duty, veterans, orphans, former foster youth, wards of the court, emancipated minors, or in legal guardianship. Youth in these categories are considered "independent students" and do not need to be verified as homeless unaccompanied youth pursuant to the Higher Education Act's verification provisions. Therefore, the information about homeless students provided in the U.S. Department of Education data addresses only a small fraction of the FAFSA applicants, as well as college students more generally, who might be homeless. Because there is no national source of data on the number of homeless students attending postsecondary institutions, the total number of college students experiencing homelessness is unknown, and, because of the data limitations described above, such an estimate cannot be derived from the FAFSA data.

[12] SchoolHouse Connection. (2018). Youth Homelessness and Higher Education: An Analysis of FAFSA Data. Washington, D.C.: SchoolHouse Connection. Available at: https://www.schoolhouseconnection.org/youth-homelessness-and-higher-education-an-analysis-of-fafsa-data/

FOOTNOTES

[13] Kienzl, G., Goldrick-Rab, S., Conroy, E., et al. (2020). #RealCollege During the Pandemic: Initial Institutional Responses to Address Basic Needs Insecurity. Philadelphia, PA: The Hope Center. Available at: https://hope4college.com/wp-content/uploads/2020/09/COVID19_InstitutionSurvey.pdf

[14] DeBaun, Bill. (2020). #FormYourFuture FAFSA Tracker. Washington, D.C.: National College Attainment Network. Available at: https://public.tableau.com/profile/bill.debaun.national.college.access.network#!/vizhome/COVID-19andFAFSACompletion/COVID-19FAFSA

[15] SchoolHouse Connection. (2020). State Laws Supporting College Students Experiencing Homelessness. Washington, D.C.: SchoolHouse Connection. Available at: https://www.schoolhouseconnection.org/state-laws-supporting-college-students-experiencing-homelessness/

[16] John Burton Advocates for Youth. (2020). AB 2416 Satisfactory Academic Progress. San Francisco, CA.: John Burton Advocates for Youth. Available at: https://www.jbaforyouth.org/wp-content/uploads/2020/07/AB-2416-Factsheet-7.6.20.pdf

[17] University of Georgia. Athens, GA: EMBARK Georgia Available at: https://embarkgeorgia.org/home

[18] SchoolHouse Connection. (2020). Five Strategies to Help Homeless Youth Transition to College During COVID-19. Washington, D.C.: SchoolHouse Connection. Available at: https://www.schoolhouseconnection.org/five-strategies-to-help-homeless-youth-transition-to-college-during-covid-19/

[19] Federal Student Aid. (2020). Application and Verification Guide 2020-2021. Washington, D.C.: U.S. Department of Education. Available at: https://ifap.ed.gov/sites/default/files/attachments/2020-05/2021FSAHbkAVG.pdf

[20] SchoolHouse Connection. Q&A From Our Inbox. Washington, D.C.: SchoolHouse Connection. Available at: https://www.schoolhouseconnection.org/learn/from-our-inboxes/

[21] National Association of Student Financial Aid Administrators. (2020). Most Frequently Asked Questions from NASFAA's Removing Barriers and Increasing Access to Financial Aid for Unaccompanied Homeless Youth Webinar. Washington, D.C.: National Association of Student Financial Aid Administrators. Available at: https://www.nasfaa.org/uploads/documents/Removing_Barriers_FAQ.pdf

APPENDIX A: STATE DATA ON FAFSA APPLICANTS DETERMINED TO BE UNACCOMPANIED HOMELESS YOUTH

State	Application Cycle						Changes from 2013-14 to 2018-19	Changes from 2016-17 to 2018-19
	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19		
AK	137	161	138	136	140	131	-4.38%	-3.68%
AL	378	403	391	451	457	521	37.83%	15.52%
AR	262	276	270	308	345	429	63.74%	39.29%
AZ	588	670	671	600	817	866	47.28%	44.33%
CA	3,432	3,697	3,660	3,871	4,584	5,674	65.33%	46.58%
CO	543	576	631	626	680	702	29.28%	12.14%
CT	190	171	203	205	212	259	36.32%	26.34%
DC	103	127	119	126	141	130	26.21%	3.17%
DE	97	94	104	97	98	105	8.25%	8.25%
FL	1,537	1,794	1,853	1,991	2,179	2,559	66.49%	28.53%
GA	813	966	960	939	1,085	1,235	51.91%	31.52%
HI	52	62	41	36	45	49	-5.77%	36.11%
IA	226	255	280	269	324	326	44.25%	21.19%
ID	186	173	172	201	240	257	38.17%	27.86%
IL	2,084	2,336	2,222	2,104	2,203	2,338	12.19%	11.12%
IN	440	483	463	461	524	559	27.05%	21.26%
KS	247	271	311	307	307	320	29.55%	4.23%
KY	281	344	302	362	403	455	61.92%	25.69%
LA	419	421	492	523	573	685	63.48%	30.98%
MA	547	559	556	565	583	694	26.87%	22.83%
MD	444	538	558	601	688	815	83.56%	35.61%
ME	201	247	201	232	241	254	26.37%	9.48%
MI	1,582	1,617	1,707	1,626	1,720	1,830	15.68%	12.55%
MN	526	526	515	514	584	679	29.09%	32.10%
MO	1,020	1,108	1,153	1,227	1,424	1,442	41.37%	17.52%
MS	192	193	212	217	225	289	50.52%	33.18%
MT	60	90	88	109	138	168	180.00%	54.13%
NC	824	877	824	900	982	999	21.24%	11.00%
ND	46	43	38	44	71	71	54.35%	61.36%
NE	164	165	158	165	194	183	11.59%	10.91%

Applicants determined to be (or at risk of becoming) unaccompanied homeless youth, either by an agency or by a school financial aid administrator. Counts represent unique applicants.

NH	123	133	139	107	132	150	21.95%	40.19%
NJ	405	461	426	430	448	600	48.15%	39.53%
NM	189	184	223	225	255	253	33.86%	12.44%
NV	291	323	335	304	337	356	22.34%	17.11%
NY	1,235	1,317	1,245	1,206	1,246	1,456	17.89%	20.73%
OH	845	814	784	815	878	878	3.91%	7.73%
OK	385	400	412	457	530	593	54.03%	29.76%
OR	1,194	1,112	1,001	1,117	1,233	1,255	5.11%	12.35%
PA	650	683	745	737	785	928	42.77%	25.92%
RI	59	48	53	45	55	52	-11.86%	15.56%
SC	283	345	301	305	365	400	41.34%	31.15%
SD	40	41	50	40	32	50	25.00%	25.00%
TN	448	487	533	536	626	731	63.17%	36.38%
TX	2,918	3,400	3,397	3,535	4,107	4,615	58.16%	30.55%
UT	114	137	158	187	227	243	113.16%	29.95%
VA	447	563	506	543	536	534	19.46%	-1.66%
VT	51	68	40	45	45	55	7.84%	22.22%
WA	1,477	1,475	1,427	1,428	1,535	1,845	24.92%	29.20%
WI	544	523	465	461	557	629	15.63%	36.44%
WV	148	189	155	188	233	224	51.35%	19.15%
WY	37	46	52	64	86	105	183.78%	64.06%
Other	208	213	208	151	131	174	-16.35%	15.23%

Applicants determined to be (or at risk of becoming) unaccompanied homeless youth, either by an agency or by a school financial aid administrator. Counts represent unique applicants.

Source: U.S. Department of Education, https://nche.ed.gov/unaccompanied-youth-data/