Making Student Status Determinations for Unaccompanied Homeless Youth: Eligibility Tool for Financial Aid Administrators

This form is to be completed by the financial aid administrator (FAA) who is evaluating a student's eligibility for independent student status. Statements related to unaccompanied homeless youth and financial aid are from the College Cost Reduction and Access Act (CCRAA) and the *Application and Verification Guide (AVG)*.

The following information provides guidance to assist FAAs in making a determination if a student seeking independent student status as an unaccompanied homeless youth comes to the attention of a FAA when a determination by a party described in the next section is not available. It is important to note that, while comprehensive, this tool may not adequately represent every homeless situation experienced by youth. As a result, it is important that FAAs make determinations on a case-by-case basis to ensure that students are able to receive the maximum amount of aid for which they are eligible.

The CCRAA expanded the definition of *independent student* to include youth who are 1) unaccompanied and homeless, or 2) unaccompanied, self-supporting, and at-risk of homelessness. The CCRAA uses the McKinney-Vento Act's definitions of *homeless*, which includes youth who lack a fixed, regular, and adequate nighttime residence; and *unaccompanied*, which includes youth not in the physical custody of a parent or guardian. It also uses *at-risk of homelessness* to refer to students whose housing may cease to be fixed, regular, and adequate.

Student Name: _____ Identification Number: _____

FAA Acceptance of Determinations by Other Parties

A school district homeless liaison or the director or designee of an emergency shelter or transitional living program funded by the U.S. Department of Housing and Urban Development (HUD) or the Runaway and Homeless Youth Act can determine that a student is eligible for independent student status as an unaccompanied homeless youth. ***In that instance, no further action is required to confirm a student's status as independent.***[1]

FAA Determination Based on Third-Party Documentation

As mandated by the CCRAA, if a determination by any of the parties listed in the previous section cannot be made, the FAA must make the determination of unaccompanied and homeless status, or unaccompanied, self-supporting, and at risk of homelessness status.

1. Does the student have documentation that attests that he/she has experienced homelessness at any time since July 1, 2014 from a recognized third party, such as a homeless shelter or service provider, FAA from another college, college access program such as TRIO or GEAR UP, college or high school counselor, mental health professional, social worker, employer, mentor, doctor, or clergy? ☐ Yes ☐ No

If yes, list the contact and relationship to the student:

_____

Summary of information provided by the third party:

_____

If the FAA feels that additional supporting documentation is needed, he/she may request contact information for the third party listed above to follow-up by phone or email, or to request a letter.

FAA Determination Based on a Documented Interview

If third party documentation is not available, a documented interview conducted by the FAA is sufficient to confirm that an unaccompanied homeless youth qualifies as independent. The FAA may make the determination based on the following information:

1. In which of the following situations does the student currently reside or in which would the student reside if not staying in on-campus housing[2] (you may choose more than one):

1 If the FAA disagrees with an authority's determination, the FAA must accept the determination, but may contact the oversight agency for the authority to evaluate the authority's determination. For more information, see the *AVG*.
2 According to the *AVG*, the definition of *homeless* includes students living in the school dormitory if they would otherwise be homeless.

- ☐ Motel
- ☐ Car
- ☐ Campsite
- ☐ Shelter or other temporary housing program
- ☐ Inadequate housing[3] (inadequate housing is that which is insufficient to meet the physical and psychological needs typically met in a home environment)
- ☐ Temporarily living with others because the student has nowhere else to go

2. If the student is living with another household, check all of the following reasons that apply:

- ☐ Loss of housing
- ☐ Economic hardship resulting in inability to secure fixed, regular, and adequate housing
- ☐ Other (including, for example, when it is not safe for a youth to live with a parent or guardian, when a parent or guardian has forced a child or youth to leave home, and other situations of abuse or conflict):

It may be helpful to ask students who are living with others where they would live if they could not stay at their current location. If the student replies that he/she would be living in one of the situations listed above (motel, car, etc.), or is not sure where he or she would stay, the student does not have fixed, regular, and adequate housing, and therefore meets the definition of *homeless*.

If the student is living in any of these situations, ***and*** is not in the physical custody of a parent or guardian, he or she meets the definitions of *homeless* and *unaccompanied*, and qualifies as an independent student. A youth fleeing abuse or neglect and living in one of these situations is considered homeless, even if the parent would provide support and a place for him/her to live.

FAA Determination: Considerations for Students Who Are Self-Supporting and At Risk of Homelessness

1. Is the student self-supporting? (Self-supporting means the student is responsible for his or her own living expenses, including fixed, regular, and adequate housing.) ☐ Yes ☐ No
2. Is the student's housing likely to cease to be fixed, regular, and adequate? Is the student at-risk of homelessness due to eviction or other loss of housing? ☐ Yes ☐ No

If the student answers yes to both of these questions, and is not in the physical custody of a parent or guardian, he or she meets the definition of an unaccompanied youth who is self-supporting and at risk of homelessness, and qualifies as an independent student.

Action Taken

- ☐ Independent student status confirmed
- ☐ Independent student status not confirmed; please explain:

Print Name	Signature (required)	Title	Date

Strengthening Student Retention Referrals:

- ☐ Basic needs (housing, food, clothing):
- ☐ Academic support:
- ☐ Student life:
- ☐ Medical/Mental health:

3 For more information on inadequate housing, please see the National Center for Homeless Education's *Determining Eligibility for Rights and Services Under the McKinney-Vento Act* brief, available at *http://center.serve.org/nche/downloads/briefs/det_elig.pdf*.