

Making Unaccompanied Homeless Youth Determinations

From a College Perspective

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Agenda

- Key definitions & policies
- Making UHY determinations
- Collaboration with partners
- Case Studies
- Q&A

Key Definitions

McKinney- Vento vs. UHY

- McKinney-Vento Education of Homeless Child and Youth Assistance Act
 - A federal law that ensures immediate enrollment in K-12 system
 - Provides educational stability for homeless children and youth
 - Requires that schools remove barriers to enrollment and retention
 - Definitions in the M-V Act are used by financial aid administrators

Key Definitions

McKinney-Vento vs. UHY

- Unaccompanied Homeless Youth
 - One of the ways a student can be determined as Independent for financial aid purposes
 - Students may answer 'Yes' to the UHY questions if they are an unaccompanied youth who was homeless or at risk of being homeless

Key Definitions

“unaccompanied youth who was homeless or at risk of being homeless”

- Unaccompanied: not living in the physical custody of a parent or guardian
- Homeless: lacking fixed, regular, and adequate housing
- Youth: applies to students who would be dependent by age
- Self-supporting: when a student pays for his or her own living expenses, which includes paying for fixed, regular, and adequate housing
- At risk: when a student’s housing may cease to be fixed, regular, and adequate, for example, a student who is being evicted or has been asked to leave their current residence and has been unable to find fixed, regular, and adequate housing

Making UHY Determinations

Two ways to determine status

- 1) Documentation from certain outside entities:
 - Local educational agency homeless liaison
 - Director of an emergency or transitional shelter, street outreach program, homeless youth drop-in center
 - Director of a Federal TRIO program
 - Financial aid administrator at another institution who documented the student's circumstance in same or prior award year

- 1) Make your own determination on a case-by-case basis.
 - Determination must be made even if the student cannot provide documentation

Making UHY Determinations

Important factors

- Institutions must review all requests for UHY determination as quickly as practicable but no later than 60 days after the student enrolls.
- FAAs must consider documentation from certain entities to be adequate.
- The reason a student is unaccompanied and/or homeless cannot be factored into the determination.
- Not required to verify the answers or require additional supporting documentation unless you have conflicting information.

FAFSA Simplification Act & UHY Determinations

- UHY flags on 22-23 FAFSAs were carried forward on renewal FAFSAs for 23-24 and will continue for future years
- 23-24 FAFSA has three UHY questions
 - At any time on or after July 1, 2022, did your high school determine you were UHY
 - At any time on or after July 1, 2022, did the director of a shelter/housing program determine
 - At anytime on or after July 1, 2022, did the director of transitional living determine
- 24-25 FAFSA (draft as of 9/1/23) question about Student Other Circumstances
- Provisional Student Aid Index (SAI) for students who self report UHY status.
 - FAA receive documentation or make their own determination and then correct the ISIR to calculate an official SAI

Examples from two colleges

Western Washington University

- Designated financial aid staff for UHY determinations and other processing
- Passport DSS outside of financial aid

Bellingham Technical College

- Designated financial aid staff for UHY determinations and other processing
- Passport DSS in financial aid
- Same staff are closely connected with emergency funding committee

Best Practice

Single Point of Contact

- A designated staff member who is committed to helping homeless youth with all aspects of their college experience
- Gives UHY students a trusted person to reach out to who is aware of their situation without needing to retell their story
- It can be particularly beneficial to have the Single Point of Contact in financial aid due to critical nature of funding needs and complexity of financial aid
- The Single Point of Contact should maintain close working relationships with others around campus to do warm handoffs

Collaboration with Partners

On campus

- Value in maintaining partnerships
 - Address equity by ensuring timely processing
 - Do warm handoffs to other supports
- Partners
 - Basic Needs Navigator
 - Academic Advisor
 - TRIO staff
 - Housing office
 - Counselors

Collaboration with Partners

Off campus

- NW Passport Network
- McKinney-Vento liaison at K-12 school district
- Know what resources are available in your community
 - DSHS resources
 - Food assistance (federal and state)
 - Local resources
 - Example: “Asset Building Coalition”
<https://whatcomresources.org/>
- Other financial aid professionals
 - Share contact info at the end of this session

Case Study # 1

The student is living with an older brother and brother's partner in a rented apartment. The older brother and his partner are breaking up. The brother and partner are breaking their lease and have given 30-day notice. The student is not on the lease agreement with the brother/brother's partner; the student has been informally living there and paying toward living expenses in the household for nearly two years. Financial aid staff have a copy of the 30-day notice from the brother/brother's partner showing they will be leaving the apartment. The brother is relocating, and the student must stay local to complete their degree. The student says that they will likely be doubling up with friends at the end of the month as they can't afford a deposit and first/last month's rent.

Case Study # 2

A student moved into campus housing during fall quarter. Prior to this, the student had been living with his parent in an abandoned building (storage closet of a friend's formerly abandoned home). The student received McKinney-Vento services from his high school. Mom states that she is still in this arrangement in the 'abandoned building' but she is only allowed to stay there week-to-week and may be asked to leave when the owner visits on Sundays. The student first stated that he does not have anywhere else to go except the dorms right now. If he was unable to stay in campus housing, he would go live with his mom in the 'abandoned building'.

Case Study # 3

Student claimed Unaccompanied and Homeless Youth or Unaccompanied and At-Risk of Homelessness with special circumstances. Discussion with the student revealed that they believed they were at-risk of homelessness.

The student explained that they had been living in one apartment with roommates. They moved to another apartment because they were uncomfortable with their roommate. However, upon review, the student went from one apartment to another without a break in housing. They terminated their lease two weeks before moving, and they moved into a new apartment before the lease was terminated.

Case Study # 4

Student submitted a FAFSA without parental information. She reached out to the financial aid office to let us know that she is homeless and wanted to talk about her options. The financial aid administrator used their UHY determination form to document whether the student meets UHY definitions. When the student was asked where they are living, the student indicated she lives in a homeless shelter. When asked who else she is staying with in the shelter, the student indicated that it was just she and her mother. They became homeless after escaping an abusive household, they left behind most of their belongings and escaped in the middle of the night.

Case Study # 5

A 20 year old student notified college staff that he had experienced homelessness in the last year. Student told staff that he had been living with family and is in contact with mom. The students mother called college staff to request assistance for her son and mentions that she's helping him with the FAFSA. The mom indicated that the student was living in an RV without running water, paying rent to the landowner in Bellingham, while mother lives in Port Townsend. The mother indicated that "He's doing all of this by choice."

Q & A

What questions do you have about supporting UHY students?

What are your experiences?

What challenges do you face?

What new ideas will you bring back to your campus?

Resources for making determinations

Policy

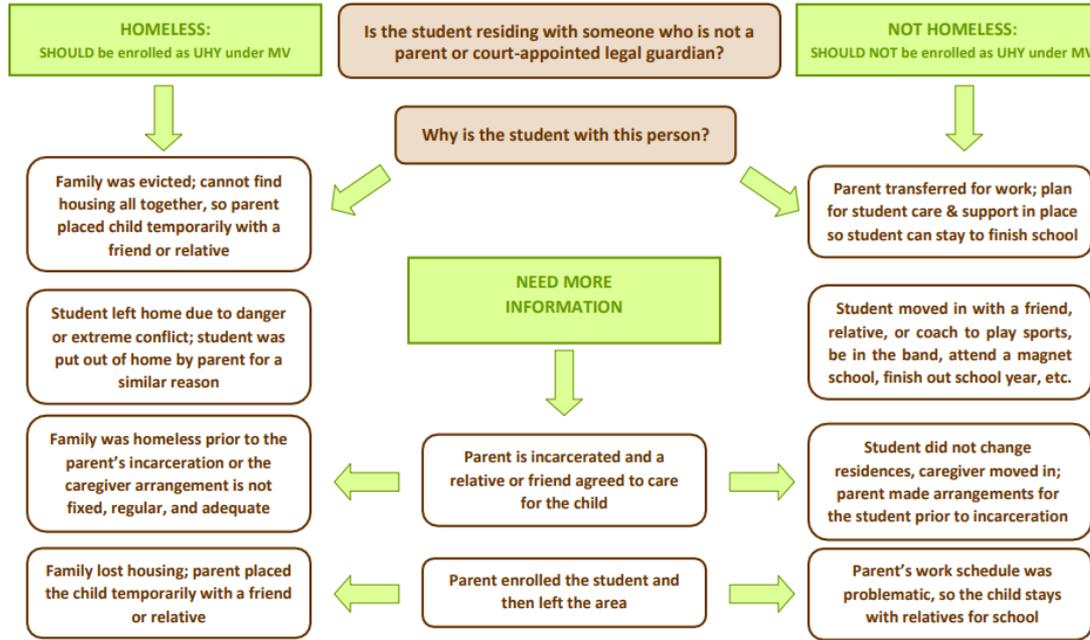
- FSA Dear Colleague Letters
 - GEN-22-15
 - GEN-23-06

Assistance with making determinations

- National Center for Homeless Education (NCHE) - <https://nche.ed.gov>
- School House Connection - <https://schoolhouseconnection.org>
- National Association for the Education of Homeless Children and Youth (NAEHCY) - <https://naehcy.org/>
- WA Office of Superintendent of Public Instruction (OSPI) - <https://ospi.k12.wa.us/student-success/access-opportunity-education/students-experiencing-homelessness>



Unaccompanied Youth Eligibility Flowchart



NOTE: The information contained in this flowchart is intended to serve as a general guide. All McKinney-Vento eligibility determinations should be made on a case-by-case basis weighing the individual circumstances of each student. To be eligible for McKinney-Vento services as an unaccompanied homeless student, the student must meet the criteria of both homeless and unaccompanied.

Tip Sheet for Unaccompanied Homeless Youth (WHY)

Unaccompanied youth experiencing homelessness, and unaccompanied youth who are self-supporting and at risk of homelessness, face many challenges completing the FAFSA. Under the Higher Education Act, these students are considered independent students, and do not need to include parental information on the FAFSA. [Guidance](#) from the U.S. Department of Education announced changes to financial aid processes for youth experiencing homelessness resulting from the FAFSA Simplification Act. These changes are in effect now, starting with the 2023-2024 FAFSA. This tip sheet is designed to help youth experiencing homelessness with some of the pressing questions they may face while filling out the FAFSA. For more information, see SchoolHouse Connection's FAFSA [page](#).

Question	Answer
1. How do I know if I meet the definition of an unaccompanied homeless youth, or unaccompanied youth at risk of homelessness and self-supporting?	An unaccompanied homeless youth is a youth under the age of 24 who is not in the physical custody of a parent or guardian and who meets the definition of homelessness outlined by the education subtitle of the McKinney-Vento Act . An unaccompanied youth at risk of homelessness and self-supporting is a youth under the age of 24 who is not in the physical custody of a parent or guardian and is currently paying for his or her own living expenses, which includes paying for fixed, regular, and adequate housing. At risk of homelessness is 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
2. I'm staying with friends temporarily because I don't have a safe or stable place to stay - do I meet the definition of homelessness?	Yes, view this page to read more about the different living situations covered under the definition of homelessness.
3. When would I have needed to experience homelessness to be considered a homeless youth on the FAFSA?	You would have needed to experience homelessness on or after July 1st of the preceding award year. For example if you're filling out the 2024-2025 FAFSA, you would have needed to experience homelessness on or after July 1, 2023.
4. What if I am experiencing homelessness with my family?	If you are experiencing homelessness with your family, you are not unaccompanied. You would fill out the FAFSA as instructed and include parental information.

Question	Answer
5. What if I'm unaccompanied and experiencing or at risk of homelessness, but still have some contact with my parents?	You can still be in contact with your parents and meet the above definition of an unaccompanied homeless youth, or unaccompanied youth at risk of homelessness and self-supporting. Contact with parents is not part of the legal definition of homelessness or unaccompanied.
6. Who are all the authorized entities that can provide me with a homeless youth determination?	Authorized entities include school district homeless liaisons or their designee ; a director or designee of a director of an emergency or transitional shelter, street outreach program, homeless youth drop-in center, or other programs serving individuals experiencing homelessness; a director or designee of a director of a program funded under a TRIO or GEAR UP grant; and a financial aid administrator at the current institution or at another institution who previously made a determination.
7. What if my institution is asking for more documentation aside from the determination letter I provided?	If you are being asked for additional information, beyond the determination letter, you can share this new federal guidance with the financial aid administrator stating that "if the student has received a documented determination from one of these authorities, the institution must not request additional documentation, proof, or statements unless it has conflicting information about the student's status."
8. What do I do if my financial aid administrator won't accept my determination?	Financial aid administrators must accept determinations from the authorized entities described in question 5 above. Share this new federal guidance with the financial aid administrator stating that "The HEA, as amended, provides that documentation from one of the above authorities is sufficient for establishing a student's unaccompanied homeless youth status. Therefore, if the student has received a documented determination from one of these authorities, the institution must not request additional documentation, proof, or statements unless it has conflicting information about the student's status."
9. What do I do if I become homeless while in college?	Reach out to your financial aid administrator using the template here .
10. Do I need to document my unaccompanied homeless youth status every year?	If you were identified as homeless on the FAFSA the prior year, your answer to the homeless question will pre-populate "yes" and you just need to confirm that your situation has not changed. You do not need to provide a new determination nor should the institution require more.

Question	Answer
11. What do I do if my institution is making me do something called a dependency override or provisional independent student status?	If you believe you meet the above definition of an unaccompanied homeless youth, or an unaccompanied youth at risk of homelessness and self-supporting, reach out to the financial aid administrator and explain that you are requesting an unaccompanied homeless youth determination outlined by federal guidance here . Financial aid administrators can provide determinations by using this template .
12. I was identified in high school as homeless and took a gap year. I'm still in the same living situation, how do I fill out the FAFSA now?	If you are still in touch with your school district liaison, reach out and see if they would write another letter for you and send it to your financial aid administrator and they must accept the determination. If you don't have a letter or aren't in touch with your liaison, reach out to the financial aid administrator using the following template here .
13. How do I find out who my school district liaison is?	View this directory here . There is high turnover, so if the entry for the liaison in your school district is not up to date, you can also reach out to your state homeless coordinator .
14. How do I prepare for an interview with a financial aid administrator or write a letter documenting my situation?	See this resource here on how to prepare for an interview with a financial aid administrator. The focus of the interview/letter should be if you meet the definition of an unaccompanied homeless youth, or unaccompanied youth at risk of homelessness and self-supporting, on or after July 1st.
15. What are other resources for students experiencing homelessness?	Reach out to your institution to see if there is a homeless higher education liaison, basic needs center, or student support office that is designated to help support students. There may be additional resources like food pantries, emergency aid, or peer support group systems. Check out SchoolHouse Connection's Youth Connections resources , including the SHC Scholarship Program .

Thank

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