

## Unaccompanied Homeless Youth Determination Policy

### POLICY

The following applies to students who have answered “Yes” to the Homeless question on the FAFSA. Starting with the 2024-25 FAFSA®, applicants under the age of 24 will be presented with a single question to determine if they are a youth who is (1) unaccompanied and homeless or (2) unaccompanied, self-supporting, and at risk of becoming homeless. If they answer “Yes” to the homeless question, they will be asked if they have a documented determination from one of the eligible authorities listed below. Applicants who affirm they are an unaccompanied homeless youth will be able to submit their application as an independent student.

### DEFINITIONS

- **UNACCOMPANIED HOMELESS YOUTH**

Unaccompanied homeless youth are young people who lack safe, stable housing and who are not in the care of a parent or guardian. They may have run away from home or been forced to leave by their parents. Unaccompanied youth live in a variety of temporary situations, including shelters, the homes of friends or relatives, cars, campgrounds, public parks, abandoned buildings, motels, and bus or train stations.

- **HOMELESS**

To clarify, the definition of homeless is broader than just living “on the street.” It can include students living:

- Temporarily with other people because they had nowhere else to go;
- In substandard housing (if it doesn’t meet local building codes or the utilities are turned off, it is generally not adequate);
- In emergency or transitional shelters, for example, trailers provided by the Federal Emergency Management Agency (FEMA) after disasters;
- In motels, camping grounds, cars, parks, abandoned buildings, bus or train stations; or any public or private place not designed for humans to live in;
- In the school dormitory if the student would otherwise be homeless
- In any of these situations and fleeing an abusive parent may be considered homeless even if the parent would provide support and a place to live.

As noted, students who are self-supporting and at risk of being homeless also qualify.

- **YOUTH**

A youth is someone 24 years of age or younger or still enrolled in high school as of the day they signed the FAFSA.

- **UNACCOMPANIED**

Unaccompanied means that the youth does not live in the physical custody of a parent or guardian.

- **AT RISK OF BEING HOMELESS**

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.

- **SELF-SUPPORTING**

A student pays for his or her own living expenses, including paying for fixed, regular, and adequate housing.

## **RULES AND REGULATIONS**

- **FAA ACCEPTANCE OF DETERMINATIONS BY OTHER PARTIES**

In determining independence due to homelessness, FAAs must consider documentation from the following entities—provided through a documented phone call, written statement, or verifiable electronic data match—to be adequate:

- A local educational agency homeless liaison, as designated by the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11432(g)(1)(J)(ii)), or a designee of the liaison;
- The director or designee of an emergency or transitional shelter, street outreach program, homeless youth drop-in center, or other program serving individuals who are experiencing homelessness;
- The director or designee of a program funded under subtitle B of title IV of McKinney-Vento (relating to emergency shelter grants) (42 U.S.C. 11371 et seq.);
- The director or designee of a Federal TRIO program or a Gaining Early Awareness and Readiness for Undergraduate program (GEAR UP) grant; or
- A financial aid administrator (FAA) at another institution who documented the student's circumstance in the same or a prior award year.

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.

According to the AVG, if the FAA disagrees with an authority's determination, the FAA must accept the determination but may contact the authority's oversight agency to evaluate the authority's determination.

- **FAA DETERMINATION**

As mandated by the HEA, 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. If FAAs are uncertain how to make the homeless determination, they can contact the local homeless liaison in their school district or one of the other authorities listed above to discuss the McKinney-Vento definition and how it applies, but the FAAs must still make the determination. To contact the state coordinator or to request contact information for the local liaison, FAAs should visit [this website](#).

Additionally, if an applicant believes they are an unaccompanied homeless youth—or unaccompanied and self-supporting youth at risk of homelessness—but are unable to answer or are uncertain of their answer to the homeless question on the FAFSA®, the applicant should contact their financial aid office to request that an FAA make a homeless youth determination.

In these situations, FAAs must make a case-by-case decision that is:

- Based upon a written statement from, or a documented interview with, the student that confirms that they are an unaccompanied homeless youth, or unaccompanied, at risk of homelessness, and self-supporting; and
- made without regard to the reasons that the student is unaccompanied and/or homeless.

- **MAKE AND CARRY FORWARD DETERMINATIONS**

FAAs shall review the eligible authority's documented determination or make their own determination that the student was an unaccompanied homeless youth, or at risk of being homeless, at any time on or after July 1st of the FAFSA® "base year" (e.g., July 1, 2023, for the 2024-2025 FAFSA®).

Institutions must review all requests for a determination of independence (including homeless youth) as quickly as possible, and as early as the year before the applicable award year, but **no later than 60 days after the student enrolls**. If the student is determined to be independent due to their unaccompanied homeless youth status, the institution shall presume the student to be independent for each subsequent award year at the same institution, unless the institution has conflicting information about the student's status or the student informs the institution that their circumstances have changed.

- **SUBMIT A FAFSA® CORRECTION**

If the FAA determines that the applicant is an unaccompanied youth who is homeless or at risk of being homeless, the FAA must submit a FAFSA® correction using the "Homeless Youth Determination" flag ISIR code 299. Additional information for correcting a student's dependency status is outlined in the Application and Verification Guide in the Federal Student Aid Handbook.

- **RETAIN DOCUMENTATION**

Institutions must retain all documents related to unaccompanied homeless youth determinations for at least 3 years after the end of the award year which the student last attended.

## BACKGROUND AND RESOURCES

- **BACKGROUND**

Between 1.6 and 2.8 million youth run away from their homes each year. Generally, youth leave home due to severe dysfunction in their families, including circumstances that put their safety and well-being at risk. Unfortunately, physical and sexual abuse in the home is common; studies of unaccompanied youth have found that 20 to 50% were sexually abused in their homes, while 40 to 60% were physically abused. Unaccompanied youth do not receive financial support from their parents and do not have access to parental information.

### *Who are McKinney-Vento School District Liaisons?*

Under subtitle VII-B of the McKinney-Vento Homeless Assistance Act, every school district is required to designate a liaison for students experiencing homelessness. Homeless liaisons have a number of legal responsibilities under the Act, including identifying youth who meet the definition of homeless and are unaccompanied. The education subtitle of the McKinney-Vento Act is overseen by the U.S. Department of Education. For more information, see [here](#).

### *What are HUD-funded Shelters?*

The U.S. Department of Housing and Urban Development (HUD) administers funding for homeless shelters and services under Title IV of the McKinney-Vento Act. These funds are distributed to communities through a competitive grant process. For more information, see [here](#).

### *What are RHYA-funded Shelters?*

The U.S. Department of Health and Human Services administers the Runaway and Homeless Youth Act programs. These programs provide funding for Basic Centers, Transitional Living Programs, and Street Outreach Programs that serve runaway and other unaccompanied homeless youth. For more information, see [here](#).

### *Where can I get more information?*

[National Center for Homeless Education](#)

[National Association for the Education of Homeless Children and Youth](#)

[Ohio Department of Education, Homeless Education Program](#)

[Dear Colleague Letter GEN-23-06](#)

[Dear Colleague Letter GEN-22-15](#)

[Substandard Housing Defined](#)