

Unaccompanied Homeless Youth Determinations: A Template for Financial Aid Administrators (2024-2025 Award Year)

The FAFSA Simplification Act includes new requirements for Financial Aid Administrators (FAAs) to accept or make determinations of a youth's status as unaccompanied and homeless, or as unaccompanied, self-supporting, and at risk of homelessness. Youth who meet these definitions are included in the Act's definition of "independent student" and do not need parental information to complete the FAFSA. These requirements went into effect in the 2023-2024 award year.

The Higher Education Act (HEA) uses the [McKinney-Vento Act's definition of "homeless,"](#) which includes youth who lack a fixed, regular, and adequate nighttime residence; and the McKinney-Vento Act's definition of "unaccompanied," which includes youth not in the physical custody of a parent or guardian. This definition is broader than shelters or the streets; it includes staying with others temporarily due to loss of housing, economic hardship, or a similar reason, and staying in motels due to lack of adequate alternative accommodations. The U.S. Department of Education (ED) defines the term "at-risk of homelessness" to refer to students whose housing may cease to be fixed, regular, and adequate.

There is no official federal form that FAAs are required to use for unaccompanied homeless youth determinations; this template is an optional tool. See ED's April 2023 [guidance](#) on unaccompanied homeless youth and federal financial aid under the FAFSA Simplification Act for the 2024-2025 award year and subsequent years.

DETERMINATIONS BY AUTHORIZED ENTITIES

Financial aid administrators must accept documentation from any of the entities who are authorized to verify a youth's status as an unaccompanied homeless youth, or as a youth who is unaccompanied, self-supporting, and at risk of homelessness, unless there is "specific documented conflicting information."

Does the youth have documentation from any of the following authorized entities that attests that the youth has experienced homelessness as an unaccompanied youth, or was unaccompanied, self-supporting, and at risk of homelessness, any time since July 1, 2023?

- School district homeless liaisons or their designee;
- The director or a designee of a director 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 a designee of a director of a program funded under a TRIO or Gaining Early Awareness and Readiness for an Undergraduate program ("GEAR UP") grant;

- A financial aid administrator at another institution who previously made a determination.

IF STUDENT HAS DOCUMENTATION FROM ANY OF THESE ENTITIES, A FAA MUST ACCEPT IT UNLESS THERE IS "SPECIFIC DOCUMENTED CONFLICTING INFORMATION." FAAs should not ask more questions or ask for additional documentation.

DETERMINATIONS BASED ON DOCUMENTED INTERVIEWS OR WRITTEN STATEMENTS

If a youth is not able to obtain documentation from at least one of the parties listed above, a FAA is required to make a determination based on a documented interview or a written statement from the student. The determination must be made based on the legal definitions of homeless and unaccompanied contained in the education subtitle of the McKinney-Vento Act, and independently from the reasons that the student is an unaccompanied homeless youth, or is a youth who is unaccompanied, at risk of homelessness, and self-supporting.

The following questions may be used to document an interview or assess a written statement.

1. In which of the following situations does the student currently reside, or in which situations would the student reside if not staying in on-campus housing³ (you may choose more than one):
 - Motel
 - Car
 - Campsite
 - Shelter or other temporary housing program
 - Substandard housing (housing that is insufficient to meet the physical and psychological needs typically met in a home environment)
 - Temporarily staying with others due to loss of housing, economic hardship, or a similar reason
2. If the student is staying with another household, check the circumstances that apply:
 - Loss of housing
 - Economic hardship resulting in inability to secure and maintain 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 youth to leave home, and other situations of abuse or conflict):

It may be helpful to ask students who are staying with others where they would live if they could not stay at their current location. If students reply that they would be living in one of the

situations listed above (motel, car, etc.), or are not sure where they would stay, then they do not have fixed, regular, and adequate housing, and therefore meet the definition of *homeless*.

If students are living in any of these situations, and are not under the care of a parent or guardian, then they meet the definitions of *homeless* and *unaccompanied*, and qualify as an independent student. According to [federal guidance](#), youth fleeing abuse and living in one of these situations may be considered homeless, even if the parent would provide support and a place 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 students answer "yes" to both of these questions, and are not under the care of a parent or guardian, they meet the definition of an unaccompanied youth who is self-supporting and at risk of homelessness, and qualify as an independent student.

ACTION TAKEN

- Independent student status as an unaccompanied homeless youth or a youth who is unaccompanied and self-supporting and risk of homelessness CONFIRMED
- Independent student status NOT CONFIRMED. Please explain and include next steps for assisting student with the FAFSA:

Print Name:

Signature (REQUIRED):

Title:

Date: