



*Building Futures Through Education*

**Summary of Unaccompanied Homeless Youth Provisions  
in the U.S. Department of Education's  
2010-2011 Application and Verification Guide**

The U.S. Department of Education's "Application and Verification Guide" (AVG) provides instructions and guidance to financial aid administrators (FAAs) and counselors who help students fill out the Free Application for Federal Student Aid (FAFSA). **The 2010-2011 edition of the AVG contains important new information regarding unaccompanied homeless youth (pp. 28-30).** A summary is provided below. The entire guide may be downloaded at <http://ifap.ed.gov/fsahandbook/1011FSAHandbookAVG.html>

**Definitions and Address**

- Students are independent if at any time on or after July 1, 2009 they are determined to be unaccompanied and homeless by school district liaisons; directors or designees of HUD Homeless Assistance programs, and directors or designees of Runaway and Homeless Youth Act (RHYA) programs.
- Students who would be homeless but for living in a dormitory are to be considered homeless.
- Students fleeing an abusive parent and living in a homeless situation are to be considered homeless, even if their parents would provide a place to live.
- Unaccompanied homeless youth may use the school address as their own on the FAFSA.

**Verification by School District Liaisons, Shelter Providers, or Other Third Parties**

- There is no federally prescribed method of documenting unaccompanied homeless youth status, but the documentation must demonstrate that the student meets the McKinney-Vento Act education definition of homelessness.
- A documented phone call with, or a written statement from, school district liaisons or HUD or RHYA-funded shelter directors or designees, is sufficient verification.
- FAAs may accept verification from recognized third-parties such as other private or publicly funded homeless shelters and service providers, financial aid administrators from another college, college access programs such as TRIO and GEAR UP, college or high school counselors, other mental health professionals, social workers, mentors, doctors, and clergy.

**Verification by Financial Aid Administrators**

- If a student does not have, and cannot get, verification from school district liaisons or HUD or RHYA shelter providers, Financial Aid Administrators (FAAs) must make a determination of eligibility. This is not an exercise of professional judgment or a dependency override.
- FAAs should examine living situations and make determinations of homeless status on a case-by-case basis.
- FAAs should make determinations of eligibility based on the legal definition of homelessness under the education subtitle of the McKinney-Vento Act.

- FAAs may make a determination of eligibility on the basis of a documented interview, if there is no written documentation available.
- FAAs are urged to use discretion and respect student privacy. Policy reports and Child Protective Services reports are not necessary.
- FAAs may request assistance in making determinations of eligibility from local school district homeless liaisons, state homeless education coordinators, or the National Center for Homeless Education.

### **Conflicting Information or Determinations**

- FAAs are not required to verify the answers to the homeless youth questions on the FAFSA, unless there is conflicting information. It is not conflicting information if an FAA disagrees with a determination made by a liaison or HUD or RHYA-funded shelter director or designee. The FAA should accept the determination, but contact relevant oversight organizations (like the state coordinator, in the case of a determination made by a liaison).
- Since determination of homeless status is not an exercise of professional judgment or a dependency override, it is a good practice for students to be able to contest determinations made by financial aid administrators. Unaccompanied homeless youth may also appeal a determination directly to the U.S. Department of Education

For more information, questions, or concerns, please contact Barbara Duffield at [bduffield@naehcy.org](mailto:bduffield@naehcy.org) or 202.364.7392.