

Removing Barriers to Financial Aid: Policy and Practice

THE CALIFORNIA STATE UNIVERSITY
BASIC NEEDS INITIATIVE CONFERENCE
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Overview

- Context: Homelessness & Risk of Homelessness
- Review: Current Federal Financial Aid Policy & Guidance
- Challenges: Gaps Between Policy and Practice
- Campus Model: CSU Long Beach
- Getting Started

Homeless Children and Youth

Children or youth who **lack a fixed, regular, and adequate nighttime residence**, including

- Sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason
- Living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations
- Living in emergency or transitional shelters

Homeless Children and Youth

- Living in a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings
- Living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings
- Migratory children living in the above circumstances
- Unaccompanied youth living in the above

Family and Youth Homelessness

Shelters are not an option for all families and/or youth experiencing homelessness

- Shelter demand often exceeds supply
- Many communities do not have shelters
- Shelters may have stay limits
- Families do not want to be separated
- Safety can be a concern

Unaccompanied Youth

Definition:

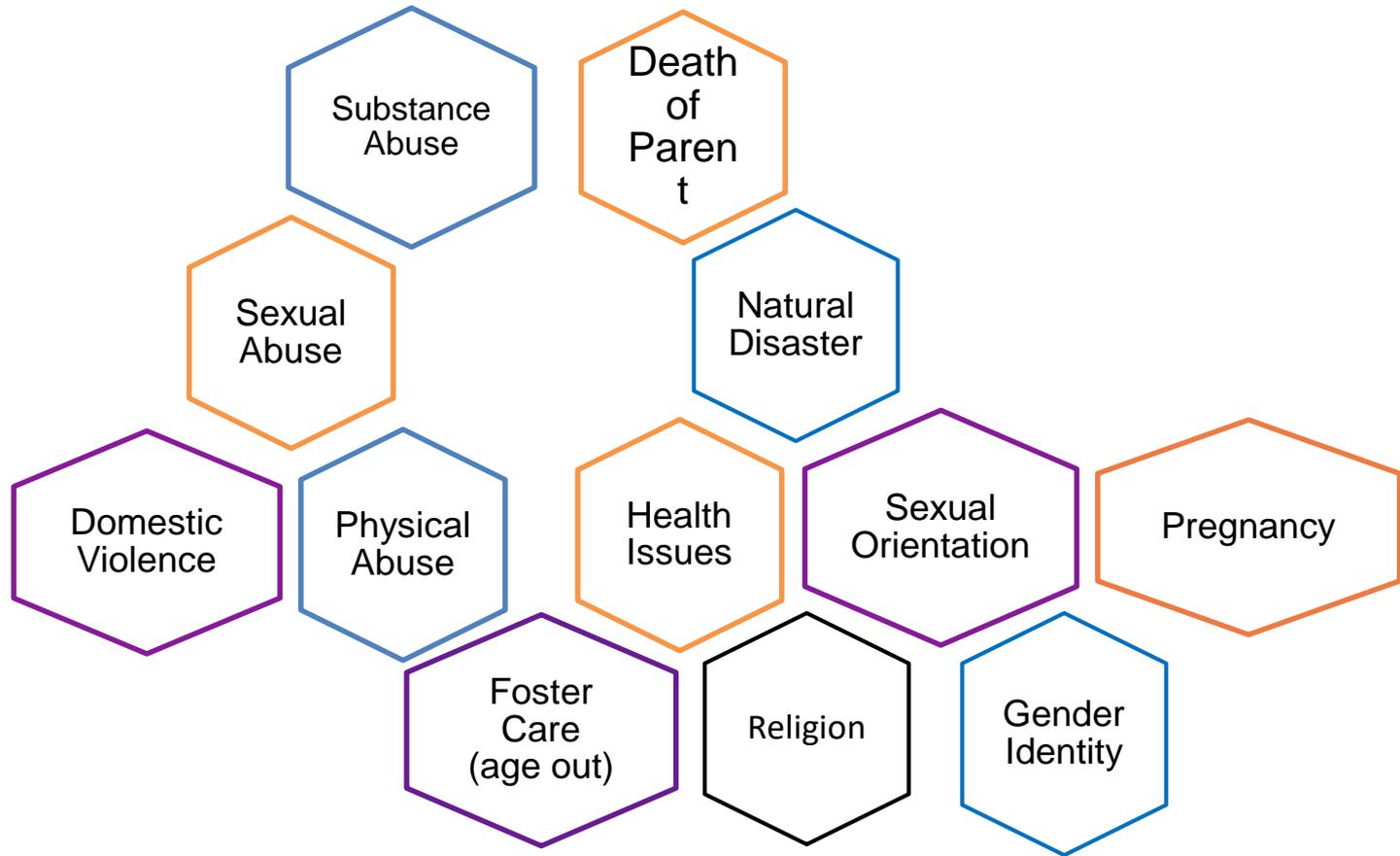
Child or youth who meets the McKinney-Vento definition of homelessness and is not in the physical custody of a parent or guardian. 11434a(6)

How Many Youth and Young Adults Experience Unaccompanied Homelessness?

New national study: Missed Opportunities; Chapin Hall, University of Chicago (Voices of Youth Count)

- 1 out of 30 youth between the ages of 13-17 (700,000); 1 out of 10 young adults between the ages of 18-25 (3.5 million)
- 29% of the 18-25 year olds who had been homeless in the previous 12 months were enrolled in college or an education program.

Why do youth and young adults experience homelessness?

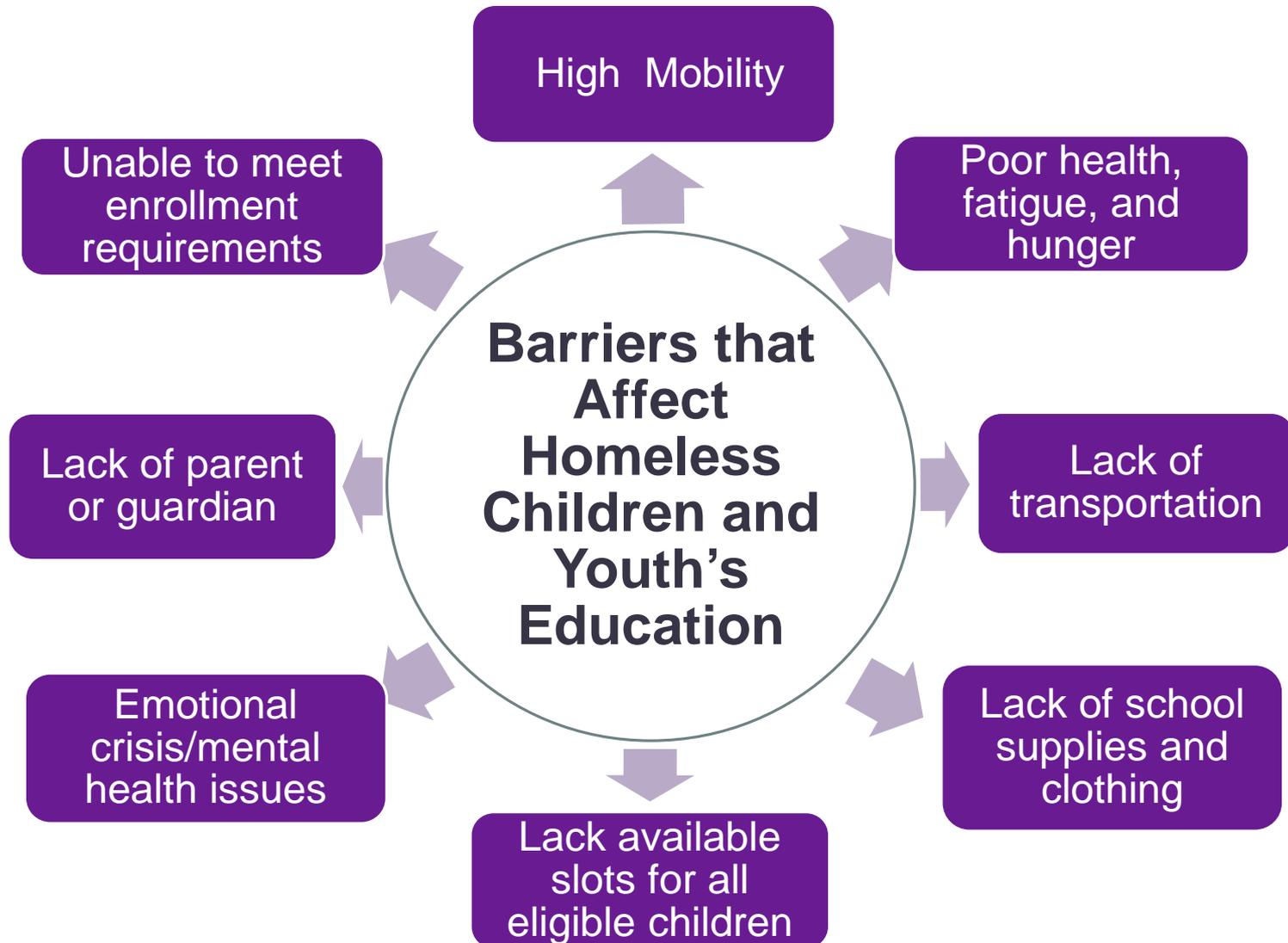


Chapin Hall: Top Three Risk Factors for Young Adult Homelessness

1. Lack of a High School Degree or GED. Young adults without a high school degree or GED are 4.5 times more likely to experience homelessness.
2. Having a Child. Young adults with a child are 3 times more likely to experience homelessness than non-parenting peers.
3. Having a Low Income. Young adults with annual household incomes of less than \$24,000 are more than twice as likely to experience homelessness.

Education Definition v. Housing Definition

Living Situation	Education (ED)	Housing (HUD)
Unsheltered Locations	Yes	Yes
Emergency Shelters/ Transitional Housing	Yes	Yes
Hotels and Motels	Yes, <u>if</u> due to lack of adequate alternatives	Yes, if paid for by govt/charity; if paying with income, only under very limited conditions
Staying with Others Temporarily	Yes, <u>if</u> due to loss of housing, economic hardship, or similar reason	Only under very narrow conditions, for certain programs
At Risk of Homelessness	No such definition in the law	Includes all families and youth homeless under other federal definitions



Higher Education Act: Independent Student Definition

- Unaccompanied homeless youth and unaccompanied youth at risk of homelessness fill out the FAFSA as independent students
 - **Unaccompanied:** Not in the physical custody of a parent or guardian
 - **Homeless:** Living arrangement meets the M-V definition of homeless
 - **At risk of homelessness:** 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.

Higher Education Act: Age Criteria

- ***New for the 2018-2019 FAFSA***: The definition of *youth* (previously defined as 21 or younger) was removed from the FAFSA
- Unaccompanied homeless students ages 23 or younger or still enrolled in high school on the date he/she signs the FAFSA qualify as independent students
- Students ages 24 or older automatically qualify for independent student status

Higher Education Act: Online FAFSA

- The online FAFSA includes four questions regarding unaccompanied homeless youth, including for youth who have no status determination as of yet
- Encourage UHY to complete the FAFSA online

On or after July 1, 2017, were you homeless or were you self-supporting and at risk of being homeless?

Yes No

At any time on or after July 1, 2017, did your high school or school district homeless liaison determine that you were an unaccompanied youth who was homeless or were self-supporting and at risk of being homeless?

Yes No

At any time on or after July 1, 2017, did the director of an emergency shelter or transitional housing program funded by the U.S. Department of Housing and Urban Development determine that you were an unaccompanied youth who was homeless or were self-supporting and at risk of being homeless?

Yes No

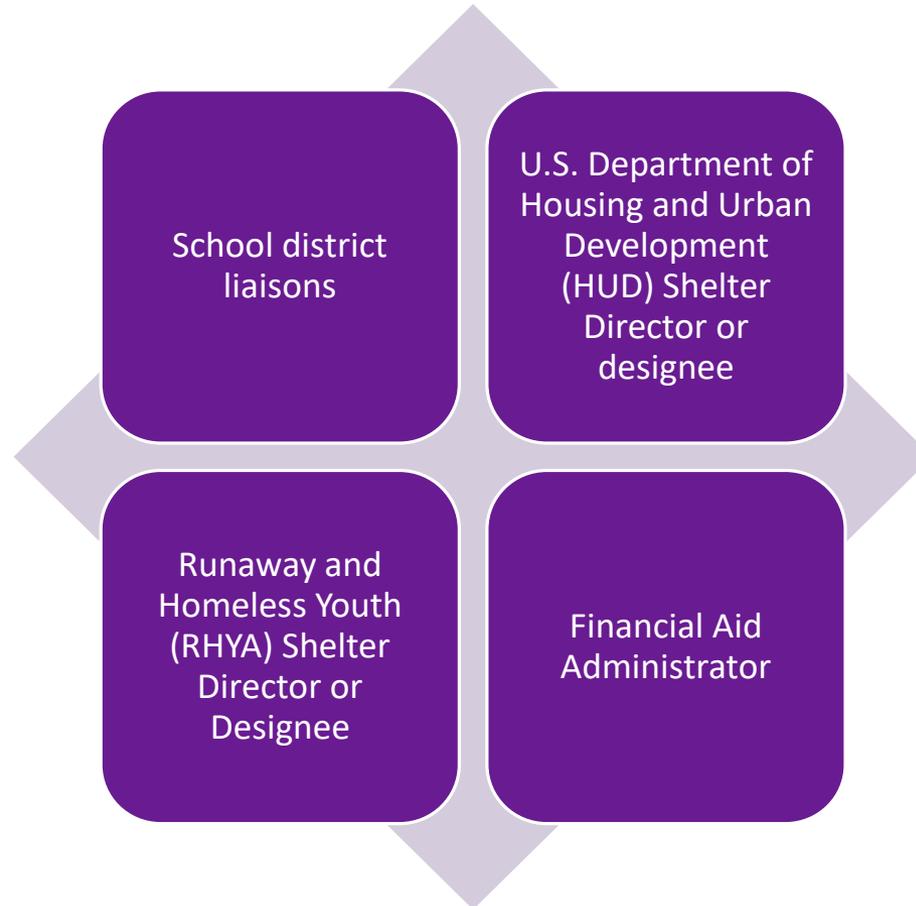
At any time on or after July 1, 2017, did the director of a runaway or homeless youth basic center or transitional living program determine that you were an unaccompanied youth who was homeless or were self-supporting and at risk of being homeless?

Yes No

Higher Education Act: Determiners of Independent Status

- Must be determined to be unaccompanied and homeless after July 1 of the prior year (i.e., July 1, 2017 for the 2018-2019 application)
- Per Guidance from ED, local liaisons have the option to make subsequent year determinations for UHY ***if they have access to the information necessary to make such a determination***
- See question Q-2 at <http://www2.ed.gov/policy/elsec/leg/essa/160240ehcyguidance072716.pdf> for more information

Higher Education Act: Who Can Make a Determination of Status



Higher Education Act: Determiners of Independent Status

- **Local homeless education liaison:** For students graduating from high school who were identified as an UHY while in high school [*required under ESSA; 42 U.S.C. § 11432(g)(6)(A)(x)(III)]; subsequent year determinations for college sophomores, juniors, and seniors (optional)
- **U.S. Department of Housing and Urban Development (HUD) shelter director or designee:** For students who have received services
- **Runaway and Homeless Youth Act (RHYA) shelter director or designee:** For students who have received services
- **Financial Aid Administrator (FAA):** For any student, but particularly those who cannot get a determination from one of the other three authorized parties

K-12 Federal Requirements: the McKinney-Vento Act

- Every local educational agency (LEA) must designate a liaison for homeless students
- LEA liaisons have 10 legal duties, including:
 - Ensuring that unaccompanied youth are informed they qualify as independent students for the FAFSA and
 - assist the youth in obtaining verification of that status.

11432(g)(6)(A)(x)(III); Guidance Q2

Transitioning to Higher Education: US Department of Education Guidance

If a liaison does not have the information that is necessary to make the determination, either because the youth become homeless after high school, or because the liaison is no longer familiar with the youth's circumstances,

the financial aid administrator must make the determination.

Government Accountability Office Report: Access to Federal Financial Assistance for Homeless and Foster Youth

Key findings of [May 2016 report](#):

- Burdensome program rules can hinder the ability of homeless and foster youth to access federal supports.
- Extensive documentation requests can impede access to aid for homeless youth.
- Annual re-verification of homelessness poses barriers for unaccompanied homeless youth.
- Limited academic preparation, family support, and awareness of resources make it harder for homeless and foster youth to pursue college.

“Verification of independent student status every semester means reliving my trauma and hardship to a complete stranger in the financial aid office and the fear of not receiving FAFSA to continue my education.”

Campus Model: CSU Long Beach



The Beginning

- **2009: The Great Unknown**
 - New Criteria for Independent Status
 - Ensure “No Abuse” of status (“gaming the system”)
 - Approach Taken – Verification of Status
 - Operated in a “bubble”

The Beginning

- **Assumptions**

- One way of Identifying
- One Type of Situation
- Availability of Documentation

The Middle

- **2012: The Great Awakening**

- Multiple ways to Identify
- More than one population
- Need for solutions

The Middle

- **2012: The Great Awakening**
 - Identified Campus Partners
 - Counselor Approach
 - Birth of SEIWP at CSU Long Beach

The Middle

- **SEIWP: Student Emergency Intervention & Wellness Program**
 - Meals
 - Grant
 - Housing
- The partnership with / role of the Financial Aid Office

The Evolution - today

WE have the power to help:

A determination of being homeless is NOT a dependency override OR a case of “professional judgement.”

The Evolution - today

■ Development of Policy and Procedure

- Back to the AVG:
 - What is truly “Required”
 - How can we help in developing solutions
 - Evolution of Forms

■ Continued involvement with SEIWP

The Evolution - today

**Ensure Financial Aid Office serves
as a Bridge --- and Not a Barrier**

WE have the power to help

The Evolution - tomorrow

- Promoting Availability of Services
- Community Partnerships
- Advocate for development of “Designated Single Point of Contact”

“I’ve talked to multiple people across various campus offices about my family situation and explained that my relationships with my family members are just about as strong as a single strand of angel hair pasta, but this fails to either register or mean anything.”

Proposed Federal Higher Education Legislation

Higher Education Access and Success for Homeless and Foster Youth Act: *S.1795/H.R. 3740*

Streamlines and removes barriers to financial aid.

Requires colleges and universities to designate single points of contact to assist homeless and foster youth and connect them with resources.

Requires colleges and universities to develop a plan to assist homeless and foster youth to access housing resources during and between academic terms.

<https://www.schoolhouseconnection.org/legislation-introduced-to-help-homeless-and-foster-youth-in-higher-education/>



The ABA has committed funds to support the development and implementation of a national Homeless Youth Legal Network (HYLN)—a new initiative to increase legal services for youth and young adults experiencing homelessness.

For more information,
please visit our website
at
www.ambar.org/HYLN

Or contact:
Amy Horton-Newell
Director, ABA
Commission on
Homelessness &
Poverty
(202) 662-1693
[Amy.Hortonnewell@
americanbar.org](mailto:Amy.Hortonnewell@americanbar.org)

Getting Started

***Where
do I
start?***



Resources

SchoolHouse Connection: <http://www.schoolhouseconnection.org/>

National Center on Homeless Education: <https://nche.ed.gov>

National Network for Youth: <http://www.nn4youth.org>

Application and Verification Guide: <http://www.ifap.ed.gov>

DVDs for awareness-raising: vimeo.com/pjulianelle

- “Education and Homelessness: Young Children to Young Adults”
- <http://www.schoolhouseconnection.org/higher-education/>

Contact Information:

Charles W. Conn, Associate Director Financial Aid, CSU Long Beach

Charles.Conn@csulb.edu

(562) 985-7390

Barbara Duffield, Executive Director, SchoolHouse Connection

barbara@schoolhouseconnection.org

202.364.7392