



September 12, 2024

Ms. Melanie Storey
Director, Policy Implementation and Oversight
U.S. Department of Education
Federal Student Aid

Re: Docket ID ED-2024-FSA-0099

Dear Ms. Storey:

Thank you for the opportunity to provide recommendations to support the successful completion and submission of the 2025-2026 FAFSA form. SchoolHouse Connection supports youth experiencing homelessness to and through higher education through policy advocacy, practical assistance and direct services. We provide training and practical assistance to hundreds of K12 school districts, institutions of higher education, and homeless service providers nationwide. We also provide intensive case management and peer support to approximately 80 young people annually through our Youth Leadership & Scholarship program. Our interactions with all of these stakeholders inform our FAFSA comments and recommendations.

Approximately 4.2 million youth and young adults experience homelessness on their own every year; approximately [29% of those youth](#) are enrolled in college or another educational institution. More recently, the National Center for Education Statistics recently released data indicating that [1.5 million students in higher education were experiencing homelessness](#).

Youth who experience homelessness on their own – referred to as unaccompanied homeless youth in federal law (UHY) – are on their own due to a variety of factors including abuse, neglect, parental incarceration, death, and other family stressors. Black, Hispanic, and Native American youth are disproportionately represented among unaccompanied youth experiencing homelessness, as well as LGBTQ+ youth and pregnant and parenting youth. Systemic inequalities, including economic disparities and discrimination, contribute to these higher rates. Yet higher education is a protective factor against youth homelessness and remains one of the best opportunities for long-term stability, economic independence, health and wellbeing. Unfortunately, unaccompanied homeless youth face many barriers accessing financial aid – for example, they may not be aware that their living situation meets legal definitions of homelessness, or how to advocate for themselves; they face challenges obtaining necessary

documentation; and they lack the familial or adult support to navigate filling out the FAFSA application process.

The FAFSA Simplification Act includes numerous policies intended to remove barriers and streamline the process for UHY. Unfortunately, both the overall 2024-2025 FAFSA delays and glitches, and specific errors related to UHY, prevented UHY from benefiting from these policies, and instead created new, often insurmountable hurdles. Our recommendations for improvements for the 2025-2026 award cycle below are based on our direct experience assisting youth, as well as information gathered from professionals attempting to assist UHY in both K12 and higher education.

1. Intentional inclusion of unaccompanied homeless youth in early testing of the 2025-2026 FAFSA roll out
2. FSA ID and other barriers prior to filling out the FAFSA
3. Text on the FAFSA Itself
4. Back-end processes and corrections
5. Student-facing communications
6. Communications to and oversight of institutions of higher education
7. Creating a UHY Determination Template for Institutions
8. Training and technical assistance

1. Intentional Inclusion of Unaccompanied Homeless Youth in Early Testing of the 2025-2026 FAFSA

In light of the extreme vulnerabilities, complexities, and barriers faced by unaccompanied homeless youth – as well as the continuing and disproportionate harm to these youth caused by the 2024-2025 FAFSA glitches/delays – we respectfully request that unaccompanied homeless youth be a targeted focus population for the October beta testing, and all future consumer or user testing periods.

As we described in the listening session, and as our Spring 2024 survey revealed, the cumulative impact of the front-end and back-end errors, and multiple delays, were insurmountable for many homeless youth. Even in the best of circumstances, the fact that both unaccompanied homeless youth and institutions of higher education must take additional steps after their FAFSA is submitted means that they have a built-in lag time before they can receive their award letters. Including a focus on unaccompanied homeless youth in the early phases of the 2025-2026 user testing window will allow ED, educators, and service providers to learn and problem solve together, and thereby help avoid the tragic loss of opportunity that occurred in 2024-2025.

We also recognize that the beta testing for the coming cycle will not be linked to any modifications of the form, but will instead be focused on its technical operations. We hope that there will be much more robust consumer testing for the 2026-2027 FAFSA which captures

student and applicant feedback and can lead to further improvements and streamlining of the form. Unaccompanied homeless youth must also be a part of this process in the future.

2. FSA ID and other barriers prior to submitting the FAFSA

According to SHC’s survey of its network on the 2024-2025 FAFSA, youth experiencing homelessness face substantial barriers, even prior to filling out the FAFSA. For example, many UHY lack access to mobile devices or the internet, which prevents or deters them from creating a FSA ID, or from being able to confirm two-step verification. While we recognize some of the technology challenges are beyond ED’s control, we ask that ED explore additional verification options, such as phone calls.

In addition, lack of a permanent mailing address can create barriers to obtaining an FSA ID. Last year, ED indicated that it planned to make changes for a coming cycle for the help text near the term “permanent mailing address” under questions 2, 26, 31, and 43 to address situations in which an applicant is experiencing homelessness—for example, by referring to a mailing address. By definition, such students do not have permanent addresses.

However, the online FSA ID creation process has not addressed this problem. We appreciate the mention of mailing addresses on the Department’s help page, but we are concerned that most unaccompanied homeless youth will not see this separate help article. Therefore, we ask that the fields related to address within the FSA ID contact fields include clear help or pop-up text, such as: “If you do not have a permanent address, provide an address where you can receive mail.”

3. Text on the FAFSA Itself

Bumper screen for youth without determinations: As we shared during the listening session, if an applicant has indicated “yes” to the homeless filtering question but selects “none of these apply” to the determination source, the 2024-25 FAFSA shows a bumper screen that indicates they are “provisionally independent.” This terminology is incorrect and confusing, as students who are unaccompanied homeless youth (or unaccompanied, at risk of homelessness, and self-supporting) are not the same as students who are provisionally independent. The Higher Education Act Section 479D(a)(3) requires the homeless determination process to be distinct from provisional independence, and Sec. 483(2)(B)(v) requires the questions for those processes to be separate.

For 2025-2026, we once again request that unaccompanied homeless youth see a customized bumper screen that is specific to their circumstances and the law, and that provisionally independent students see another one that is similar to the bumper screen they see now. This requires adjusting the flow to ensure they see the right screens depending on their answers to the previous questions. We suggest the following language for unaccompanied homeless youth;

Determination of Homelessness

You have indicated that you are unaccompanied and either (1) experiencing homelessness or (2) self-supporting and at risk of experiencing homelessness.

Your financial aid administrator is required to make a determination of your status based on a written statement from you, or a documented interview with you, in time for you to be able to receive financial aid. Please contact your school's financial aid office to complete this process.

This recommended text aligns with the requirements of the *FAFSA Simplification Act* and directs the student to follow up in the most effective and expeditious manner.

If the Department does not create separate bumper screens for unaccompanied homeless youth and provisionally independent students in the 2025-26 cycle, students will continue to experience significant confusion about their next steps. For example, a single bumper screen that displays two different categories of students will lead to more questions for applicants and financial aid offices alike, with students being unsure which category they fall into. The Department must create separate pathways that comply with the distinct categories under the HEA. And, all follow-up communications to students—including the FAFSA Submission Summary and emails—must make clear what steps the student will take after submitting their form.

Question Label/Title: We request that the header or label of the homelessness question be modified to a more easily distinguishable term, such as “Experience with Homelessness” instead of “Student Other Circumstances.” There are many confusing, similar, and vague terms on the FAFSA and Federal Student Aid websites used to refer to students’ circumstances, including “personal,” “special,” “other,” and “unique.” It is exceedingly difficult for students to understand the differences in terminology and to advocate for themselves accordingly. Changing the header of this question will help students, financial aid administrators, and support organizations refer to the correct portions of the FAFSA. Neither statute nor regulation requires the labels of these questions to match the back-end processes and technical terminology used by financial aid administrators and ED, and we request that they be adjusted for simplicity.

Question Text: We request that ED expand the period referenced for when the student may have been experiencing homelessness, or at risk of homelessness, to better support these youth. The timeline should be prior-prior year (or the previous two years) as used elsewhere throughout the FAFSA, instead of “on or after July 1, 2024” – a narrower window not proscribed by the Higher Education Act. Shifting this timeline to “during the previous two years” (or, at a minimum, on or after July 1, 2023) will help these at-risk youth be more likely to be identified and supported by their states and institutions.

Question Flow for Students Over Age 24: Unlike in previous years, all students, including those who are 24 or older, or otherwise independent students, can now answer the homeless filtering question. This question can and should be used by schools to target students and connect them with the appropriate resources. Students who already qualify as independent due to being 24 or

older, a veteran, having a dependent child, or other reasons may still be experiencing homelessness and need support from their school; the filtering question provides schools with this information

However, some institutions are creating unnecessary steps by asking for homeless students who are 24 and over, or who are independent for other reasons, to provide documentation and verification of their circumstances, even though there are no additional steps required for federal aid, as they do not fall under the UHY category. Some institutions have also asked students, such as graduate and professional students, to change their answer to “no” on the filtering question even though they are, in fact, experiencing homelessness.

In the case that an institution has a policy for their institutional aid that is tied to a student’s answer on the homeless filtering question, but their policy is not specific to students who are 24 or older or otherwise independent, we ask that ED require institutions to revisit and change that policy, rather than placing the burden on the student to provide additional information or change their answer. We also urge ED to provide guidance to institutions about the possibilities and implications of the homeless filtering question.

Pre-Selection for Renewal Applicants: Last year, ED indicated that it planned to make changes for a coming cycle to the prepopulated answers for renewal applicants that previously indicated yes to the homeless filtering question but selected “none of these apply” to the determination source, in the 2024-25 FAFSA, or prior years.

We would like to confirm the implementation of this commitment, so that students who were determined to be homeless by their financial aid administrator will have their determination of homelessness source pre-selected as “financial aid administrator” in a renewal application for 2025-2026.

4. FAFSA Back-End Processes and Corrections

Below are statements from financial aid administrators responding to SHC’s 2024-2025 FAFSA Survey:

“Due to lack of instructions and definitions on the FAFSA for Unusual Circumstances, the students are answering the questions incorrectly and we are unable to correct them. These are the students that need more help and assistance, and due to circumstances beyond our control, answers they are looking for are delayed and we are sitting here unable to assist.”

“Not being able to make corrections was an enormous hurdle for the institution and the student. There was a great deal of follow up for these potential students, and many of them gave up.”

“Since schools are unable to make corrections to 24/25 FAFSA, we are unable to perform Homeless Determinations. This will greatly delay aid offers to students impacted. Additionally, we are a very large public institution and having to make manual

corrections will be a very long process which will delay things even further.”

“By far the biggest issue to date is the fact that financial aid administrators cannot make updates to the FAFSA so every one of my students are in limbo waiting for me to be able to make the updates.”

“We have not been able to package any of the students in this scenario, because the Dept of ED is not accepting school corrections. This is not fair to these students.”

“This system must be fixed. Our students become disheartened and decide not to pursue college or technical education.”

“Federal Student Aid (FSA) has really dropped the ball on unaccompanied homeless youth this year. Because these students are only given a provisional SAI (Student Aid Index) we cannot fully package them currently. FSA has not built the capacity for financial aid professionals to make the declaration that students are unaccompanied homeless youth or at risk of homelessness as we still don't have access to make corrections to ISIR.”

The Higher Education Act requires that financial aid administrators (FAAs) make unaccompanied homeless determinations for youth who do not have determinations from the list of authorized entities described in the law. Furthermore, it requires that institutions 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.

However, in the 2024-2025 cycle, unaccompanied homeless youth who do not have determinations from other sources, and for whom a financial aid administrator is required to make a determination, are receiving a “reject code 01” when their application is submitted. This code – coupled with the inability to make batch corrections – is preventing financial aid administrators from taking action to assist these students.

To rectify this problem in 2025-2025, we request that unaccompanied homeless youth receive a unique actionable comment code to allow FAAs to provide estimated aid while determinations of unaccompanied homeless youth status are made. We similarly request that provisionally independent students receive a unique actionable comment code, so that a provisional SAI and an estimate of federal student aid eligibility can be provided. Unique comment codes will also help clarify the different required processes for FAAs to make unaccompanied homeless youth determinations.

In addition, we urge ED to:

- Invite students with comment code 325 in 2024-2025 to be part of soft launch to provide an expanded time frame for determinations
- Make all corrections available as soon as possible after launching the 2025-26 FAFSA, and communicate the 60-day time limit for making a determination after enrollment.

5. Student-Facing Communications

Emails

Below are statements from school district homeless liaisons and service providers responding to SHC's 2024-2025 FAFSA Survey:

"The FAFSA completion confirmation email said that UHY "appear to not be eligible for the Pell Grant" which made a lot of my kids nervous and some even decided to forgo college in favor of other post-secondary avenues because of the unclear and very delayed information about being able to afford college."

"The youth that we assisted all received emails prompting them to go back in and redo portions because of lack of parental information. This caused fear and great discouragement to the youth as FAFSA had been completed, they did not get the needed confirmation of financial support, and then the emails implied they had done the process incorrectly and would need information that they cannot get to succeed. We had to run interference to stop youth from succumbing to the fear and discouragement caused by what appear to be automated responses that are not set to be monitored for unaccompanied homeless youth or youth with experience in foster care. The delay caused one challenge, but these emails were disheartening and stressful for students, released in the midst of end of semester exams and life transitions under laws that are designed to protect students from the undue stressors of the system. Please advocate for immediate resolution to this."

"I want to know why students are getting confirmation emails saying that they might not be Pell eligible when they clearly are. This alienates the very students that the Better FAFSA is aimed to help."

"Many of my youth have received errors, and there has been no response from the FAFSA office on why, or any help. One of my youths received an email that he is not eligible for anything, and he is a foster youth."

The statements above describe the confusion, heartache, and despair caused by automatic email responses to some unaccompanied homeless youth and some foster youth during the 2024-2025 FAFSA process. Later in the award year, applicants who indicated that they were unaccompanied homeless youth received emails that were intended to help them, but appeared to second-guess them by asking if they were sure they meant to check this status, and implying that they might need to go back in and make a correction. Even unaccompanied homeless youth who had determinations from authorized entities received these emails, which created more confusion.

To improve email communication to youth completing the FAFSA in 2025-2026, we ask ED to:

- Provide clear instructions and links to resources to applicants who select unaccompanied homeless youth status. For youth who indicate that they have UHY determinations, the email should let them know that they may be asked for the determination, and that the FAA is required to accept it unless there is conflicting

information. For youth who do not have UHY determinations, the email should plainly state the responsibility of the FAA to make the determination based only on the legal definitions of homelessness, and based only on a written statement or documented interview (as well as the time frame). The emails should link to [ED's July 2024 electronic announcement](#), so that youth can read the fine print if they are so inclined, and be able to advocate for themselves.

- Provide clear information about homelessness to youth who indicate that they are provisionally independent because cannot provide parental information. Many youth do not realize that their circumstances meet the definition of homelessness; moreover, the term “homelessness” itself creates stigma and fear. And finally, the reasons listed for provisional independent status on the FAFSA are also reasons why youth experience homelessness on their own. For these reasons, we strongly believe that many youth who select provisional independence are in fact likely to meet the definition of unaccompanied homeless youth. Emails sent to PI applicants should include a summary of the definitions of homeless and unaccompanied, and encourage applicants who meet these definitions to go back and mark the UHY questions in the affirmative.

Tip Sheets, Help Text, and Other Online Materials

Almost all of ED’s online materials are out of date, and do not reflect changes that were made by the FAFSA Simplification Act regarding unaccompanied homeless youth.

We have reviewed each document and suggested line edits to bring these materials up-to-date with current law (see Appendix A).

6. Communications to and oversight of institutions of higher education

Below are statements from school district homeless liaisons and service providers responding to SHC’s 2024-2025 FAFSA Survey:

“There is inconsistency between the different colleges and how they even understand homeless students. One college had a specific form simply filled out and returned no problems, another college didn’t have anything and was having the student fill out unnecessary forms even though they were homeless.”

“It seems to me that schools and universities have a lot of discretion for if they will request paperwork/proof from the student or not.”

“My issue has been with colleges/universities that require unaccompanied youth experiencing homelessness to complete a form that requires a parent signature.”

These statements are consistent with our experiences with our own scholarship students, as well as with the experiences of youth who reach out to us for help. Far too many institutions are continuing to ask youth to submit additional documentation that they do not need, or are using outdated forms that do not reflect the broader set of entities who can make homeless youth determinations.

In addition to more training, we ask ED to help institutions come into compliance with the law, and implement it robustly, by:

- Increasing oversight of the unaccompanied homeless youth provisions during monitoring. ED’s July 2019 and April 2023 electronic announcements stated that “In all situations, institutions should be able to show that their policies and procedures for reviewing and making homeless youth determinations are compliant with statutory requirements.” We urge ED to ask institutions:
 - To describe their processes for making UHY determinations, including asking for a copy of any forms
 - The number requests for UHY determinations received; the number of UHY determinations made; and the reasons for any UHY determinations that were not made.

7. Creating a UHY Determination Template for Institutions

SHC has [a template](#) that is used and downloaded by some institutions. We understand that ED cannot promote the forms or resources of an outside organization, but we also believe that an “official” form from ED to help institutions make and document UHY determinations would be more widely used, accepted, and understood. While an official ED form would take time to go through various levels of ED and OMB clearance, we believe it would be worth doing.

Finally, some institutions are requiring additional documentation from UHY for state and institutional. This re-imposes some of the very barriers that the changes to the FAFSA Simplification Act sought to eliminate, ultimately delaying aid. Section 483(a)(6) of the FAFSA Simplification Act requires ED to publish a list of institutions and states that require additional forms other than the FAFSA for their aid, and also directs the Secretary to “conduct outreach to States in order to research the benefits to students of States relying solely on the SAI, schedule Pell Grant Award, or the financial data made available, upon authorization by the applicant, as a result of an application for aid under this subsection for determining the eligibility of the applicant for State provided financial aid.” We urge ED to conduct this outreach with the benefits to UHY in mind, and to encourage institutions to remove additional documentation requirements for UHY

8. Training and Technical assistance

SHC’s 2024-2025 FAFSA survey asked our network members: “What would help ensure that the unaccompanied homeless youth and youth with experience in foster care you work with are informed of their status as independent students for the FAFSA and get the determinations they need to access financial aid?”

The top three most frequently marked responses were:

1. Specific training/tools for educators, college access programs, and service providers:

69.37%/505 respondents

2. Outreach and awareness materials for youth: 66.76%/486 respondents
3. More dedicated staff time to assist students: 46.7%/340 respondents

Clearly, more training is needed. This matches our own direct experience, which includes:

- Lack of awareness of (and sensitivity to) unaccompanied homeless youth and the FAFSA policies aimed to remove barriers
- Requests for unnecessary additional documentation
- Misrouting youth through provisional independence or professional judgment
- Lacking confidence in making unaccompanied homeless youth determinations

SchoolHouse Connection conducts many trainings and creates many tools, but we lack capacity to meet the extent of need. We realize that ED, too, has capacity constraints, but ask that information on unaccompanied homeless youth be accurately and fully integrated into existing ED training and tools. In particular, we are grateful for ED's July 2024 electronic announcement, and ask that its contents be included in as many trainings as possible.

Finally, we remain deeply concerned that there are many more unaccompanied homeless youth than federal FAFSA data indicate. Because both financial aid administrators and youth themselves lack familiarity with the definitions of homelessness, many unaccompanied homeless youth either select, or are routed through, more burdensome, lengthy, and traumatic professional judgment processes, rather than through the more streamlined UHY process. We fear many youth simply choose not to pursue postsecondary education because of these barriers.

As currently constructed, the FAFSA requires youth to self-identify as unaccompanied homeless youth. However, if FAAs were trained to proactively screen for UHY status when making provisional independence or professional judgment determinations, they could help unaccompanied homeless youth benefit from the FAFSA policies designed to help them. We therefore ask ED to help train and urge FAAs to include such screening, and are happy to work with ED to develop sample questions and processes.

Thank you again for your willingness to consider these recommendations. We stand ready to assist to remove barriers to youth who struggle with homelessness, and help them obtain the postsecondary education that is their surest path to stability.



APPENDIX A

Edits to Tip Sheets, Help Questions, and Other Online Information on FAFSA and Unaccompanied Homeless Youth

We have reviewed each document below and suggested line edits to bring these materials up-to-date with current law.

FAFSA® Tips for Unaccompanied Homeless Youth -

<https://studentaid.gov/apply-for-aid/fafsa/filling-out/homeless>

- Unaccompanied means you're not living in the physical custody of your parent or guardian.
- Homeless means lacking fixed, regular, and adequate housing. You may be homeless if you're living in shelters, parks, motels, hotels, public spaces, camping grounds, cars, or abandoned buildings, or if you're temporarily living with other people because you have nowhere else to go. Also, if you're living in any of these situations and fleeing an abusive parent, you may be considered homeless even if your parent would otherwise provide a place to live.
- "At risk of homelessness means your housing may cease to be fixed, regular, and adequate. For example, you are being evicted or have been asked to leave your current residence and have been unable to find fixed, regular, and adequate housing."
- "Self-supporting means you pay for your own living expenses, including fixed, regular, and adequate housing"

The U.S. Department of Education doesn't offer a financial aid program specifically for students who are homeless and unaccompanied. However, homeless and unaccompanied students, and students who are unaccompanied, self-supporting, and

at risk of homelessness, can receive money for college or career/trade school if they meet the [eligibility requirements for federal student aid](#), and they may be able to apply for federal student aid without being required to provide parent information. To apply for federal student aid, you'll need to complete the [Free Application for Federal Student Aid \(FAFSA®\) form](#).

Providing Parent's Information

If you answer "Yes" to the unaccompanied and homeless question on the FAFSA form, you can complete and submit the FAFSA form without providing your parent's information.

Updating Your Address

The mailing address information in your FAFSA form will be prefilled. If your mailing address information needs to be updated, you can update it in your Account Settings after [logging in](#).

While you don't need to provide a home address, you must provide a mailing address where you can reliably receive mail. Your mailing address can be the address of a relative or friend who has given you permission to use it, or it can be your college's or career/trade school's address. If you want to use your school's address, you must contact the school for permission and instructions to ensure that your mail reaches you.

Receiving Homeless Youth Determination

After you answer "Yes" to the general unaccompanied and homeless question on the FAFSA form, you'll be asked whether you have received a homeless youth determination from an individual at one of these eligible agencies:

- your high school or district homeless liaison or designee
- the director or designee of an emergency or transitional shelter, street outreach program, homeless youth drop-in center, or other program serving those experiencing homelessness
- the director or designee of a project supported by a federal TRIO program or a Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) grant
- a financial aid administrator

In some cases, the individual listed above may be allowed to make a homeless youth determination only if you are receiving their program's support or if, in the case of a

school district homeless liaison or designee, you are in their high school or high school district.

Not Having Homeless Youth Determination

If you answer “Yes” to the general unaccompanied and homeless question on the FAFSA form but have not received a homeless youth determination from one of the individuals at an eligible agency, you can still submit the FAFSA form without parent information, but you’ll need to complete additional steps with the financial aid office at your college or career/trade school before your eligibility for financial aid can be finalized. You will select “none of the above” to the unaccompanied and homeless question on the FAFSA form and proceed with completing the application.

Once you submit the FAFSA form, a financial aid administrator at the college or career school you plan to attend must document and determine if you are indeed an unaccompanied homeless youth. ~~While it is not required to help the financial aid administrator make a homeless youth determination, you may want to submit documentation from any of the following:~~

- ~~Local school district personnel~~
- ~~State homeless education coordinators~~
- ~~The National Center for Homeless Education (NCHE)~~
- ~~Third parties such as private or publicly funded homeless shelters and service providers~~
- ~~College or high school counselors~~
- ~~Mental health professionals, social workers, mentors, doctors, or clergy~~

If you don’t have documentation of your homeless status from any of the sources listed in the section above, the financial aid office is required to make a determination of your homeless youth status based upon 1) a written statement from you; or 2) a documented interview that confirms you are an unaccompanied homeless youth, or unaccompanied, at risk of homelessness, and self-supporting. The determination must be made without regard to the reasons that you are unaccompanied and/or homeless, or the circumstances that lead to your status.

If you have additional questions, contact the financial aid office at the college or career school you plan to attend.

Reporting Parent Information

<https://studentaid.gov/apply-for-aid/fafsa/filling-out/parent-info>

Student Is an Unaccompanied Homeless Youth

If you indicate that you are unaccompanied and homeless or at risk of being homeless on the FAFSA form, you can complete and submit the form without providing parent information.

Look for the “At any time on or after July 1, 2023, were you unaccompanied and either (1) homeless or (2) self-supporting and at risk of being homeless?” question. Select “Yes” and indicate if you were determined to be homeless or at risk of being homeless by one or more of the following eligible agencies:

- your high school or district homeless liaison or designee
- the director or designee of an emergency or transitional shelter, street outreach program, homeless youth drop-in center, or other program serving those experiencing homelessness
- the director or designee of a project supported by a federal TRIO program or a Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) grant
- a financial aid administrator
- ~~A local educational agency homeless liaison, as designated by the McKinney-Vento Homeless Assistance Act, 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 the McKinney-Vento Homeless Assistance Act~~
- ~~The director or designee of a Federal TRIO program or a Gaining Early Awareness and Readiness for Undergraduate program (GEAR UP) grant~~
- ~~A financial aid administrator (FAA) who documented your homeless circumstance in the same or a prior award year~~

If you don't have a determination from any of the listed agencies, select “None of these apply.” An FAA at your college or career/trade school will review your circumstance and determine whether you qualify as an unaccompanied homeless youth based upon 1) a written statement from you; or 2) a documented interview that confirms you are an unaccompanied homeless youth, or unaccompanied, at risk of homelessness, and self-supporting. The determination must be made without regard to the reasons that you are unaccompanied and/or homeless, or the circumstances that lead to your status.

Learn more about what it means to answer “yes” to the [student unaccompanied and either homeless or self-supporting and at risk of being homeless question](#) on the FAFSA form.

At any time on or after July 1, 2023, was the student unaccompanied and either (1) homeless or (2) self-supporting and at risk of being homeless?

- <https://studentaid.gov/2425/help/unaccompanied-homeless>

Homeless means lacking fixed, regular, and adequate housing. The student may be homeless if they’re living in shelters, parks, motels, hotels, public spaces, camping grounds, cars, abandoned buildings, or they’re temporarily living with other people because they have nowhere else to go. Also, if they’re living in any of these situations and fleeing an abusive parent, they may be considered homeless even if their parent would otherwise provide a place to live.

Unaccompanied means the student isn’t living in the physical custody of their parent or guardian.

At risk of being homeless means the student’s housing may cease to be fixed, regular, and adequate. For example, the student is being evicted or being asked to leave their current residence and is unable to find fixed, regular, and adequate housing.

Select “Yes” if the student was determined to be homeless or at risk of being homeless by one or more of the following eligible agencies:

- a high school or district homeless liaison or designee
- the director or designee of an emergency or transitional shelter, street outreach program, homeless youth drop-in center, or other program serving those experiencing homelessness
- the director or designee of a project supported by a federal TRIO program or a Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) grant
- a financial aid administrator
- ~~A local educational agency homeless liaison, as designated by the McKinney-Vento Homeless Assistance Act, 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 the *McKinney-Vento Homeless Assistance Act*~~
- ~~The director or designee of a Federal TRIO program or a Gaining Early Awareness and Readiness for Undergraduate program (GEAR UP) grant~~
- ~~A financial aid administrator (FAA) who documented the student's homeless circumstance in the same or a prior award year~~

Note: The FAA at the student's college or career school may require a copy of the homeless determination the student received.

If the student does not have a determination from any of the listed eligible agencies, select "Yes" and then select "None of these apply." Even if the student doesn't have any documentation of their homelessness from any of the listed eligible agencies, an FAA at the student's college or career school must still review the student's circumstance and make a determination as to whether they qualify as a homeless youth based upon 1) a written statement from the student; or 2) a documented interview that confirms that the student is an unaccompanied homeless youth, or unaccompanied, at risk of homelessness, and self-supporting. The determination must be made without regard to the reasons that the student is unaccompanied and/or homeless, or the circumstances that lead to their status..

Contact the financial aid office at the college or career school the student plans to attend to receive guidance on next steps after submitting the *Free Application for Federal Student Aid* (FAFSA®) form or for help answering this question.

Will I need my parents' information? (2024–25)

<https://studentaid.gov/2425/help/need-parent-info>

Authorities that can determine you were unaccompanied and either (1) homeless or (2) self-supporting and at risk of being homeless include the following:

- Your high school or district homeless liaison or designee

- The director or designee of an emergency or transitional shelter, street outreach program, homeless youth drop-in center, or other program serving those experiencing homelessness
- The director or designee of a project supported by a federal TRIO program or a Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) grant
- A financial aid administrator
- Director or designee of an emergency or transitional shelter, street outreach program, homeless youth drop-in center, or other program serving those experiencing homelessness
- Your high school or school district homeless liaison or designee
- Director or designee of a project supported by a federal TRIO or GEAR UP program grant
- Financial aid administrator

If none of the above conditions apply, then you are considered a dependent student and generally must provide your [parents information](#) on your FAFSA form.

If You're Not Officially Designated Homeless or At-Risk of Being Homeless

If you do not have an official determination from an authority stating that you are unaccompanied and [homeless or at-risk of being homeless](#), but feel you qualify, speak with a financial aid administrator (FAA) at your chosen college or career school. An FAA can review your circumstances to determine if you qualify as an independent student.

If you meet the definition of unaccompanied and either homeless or self-supporting and at risk of homelessness, but do not have a determination from one of the sources listed above, speak with a financial aid administrator (FAA) at your chosen college or career school. An FAA must review your circumstance to determine if you qualify as an unaccompanied youth experiencing homelessness or self-supporting and at risk of being homelessness. This determination must be based on a written statement from you, or a documented interview with you, and made without regard to the reasons that you are unaccompanied and/or homeless, or the circumstances that lead to your unaccompanied homeless status.

Unusual Circumstances

If you have an [unusual circumstance](#) that prevents you from providing parental information, you may still be able to submit your FAFSA form.

You may be experiencing unusual circumstances if you

- left home due to an abusive or threatening environment;
- are abandoned by or estranged from your parents, and have not been adopted;
- have refugee or asylee status and are separated from your parents, or your parents are displaced in a foreign country;
- are a victim of human trafficking;
- are incarcerated, or your parents are incarcerated and contact with your parents would pose a risk to you; or
- are otherwise unable to contact or locate your parents and have not been adopted.

If your circumstances resulted in not having a safe, stable place to live, you may be considered a homeless youth, and should review the previous section about receiving an unaccompanied homeless youth determination.

Dependency Status

- <https://studentaid.gov/apply-for-aid/fafsa/filling-out/dependency>

~~**You'll be considered provisionally independent and will be allowed to fill out the FAFSA form as an independent student if you indicate that you are unaccompanied and homeless or at risk of being homeless on the FAFSA form for the first time and you don't have a determination from an individual at an eligible agency. An individual at an eligible agency includes one of the following:~~

- ~~your high school or district homeless liaison or designee~~
- ~~the director or designee of an emergency or transitional shelter, street outreach program, homeless youth drop-in center, or other program serving those experiencing homelessness~~
- ~~the director or designee of a project supported by a federal TRIO program or a Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) grant~~
- ~~a financial aid administrator~~

~~You are an independent student if you indicate you are unaccompanied and homeless or at risk of being homeless and self-supporting on the FAFSA form~~

~~and can provide a determination from an individual at an eligible agency. An individual at an eligible agency include (see list of authorized entities)...
If you meet the definition but cannot provide a determination, reach out to your financial aid administrator to request an unaccompanied homeless youth determination. The financial aid administrator is required to make a determination based on a written statement from you, or a documented interview with you. The determination must be made without regard to the reasons that you are unaccompanied and/or homeless, or the circumstances that lead to your unaccompanied homeless status.~~

No Contact With My Parents

If you have no contact with your parents and don't know where they live, or you've left home due to an abusive situation, check to see if you meet the definition of an unaccompanied homeless youth. If you meet the definitions of an unaccompanied homeless youth, or a youth who is unaccompanied, self-supporting, and at risk of homelessness, select "Yes" to the homelessness questions. If you do not meet the definitions of an unaccompanied homeless youth, or a youth who is unaccompanied, self-supporting, and at risk of homelessness, select "Yes" to the "Do unusual circumstances prevent the student from contacting their parents or would contacting their parents pose a risk to the student?" question on the 2024–25 FAFSA form. You'll be considered provisionally independent. To complete your application, you should contact the financial aid office at the college or career/trade school you plan to attend to find out what supporting documentation you'll need to submit directly to the school.

Learn more about [how to fill out the FAFSA form if you have unusual circumstances](#) that prevent you from providing parent information.

[Am I Dependent or Independent When I Fill Out the FAFSA® Form?](#)

- Currently has information from 23-24 FAFSA - change dates
- Homeless question needs to be updated with the correct date and authorized entities

Reporting Parent Information

<https://studentaid.gov/apply-for-aid/fafsa/filling-out/parent-info>

Can't Provide Parent Information Due to an Unusual Circumstance

Unusual circumstances may include the following situations:

- Your parents are incarcerated.
- You have left home due to an abusive family environment.
- You are a victim of human trafficking.
- You have been granted refugee or asylee status.
- You were abandoned by or estranged from your parents and have not been adopted.

If any of these circumstances resulted in not having a safe, stable place to live, you may be considered a homeless youth, and should review the previous section about receiving an unaccompanied homeless youth determination.

If you have an unusual circumstance, but did not experience homelessness as an unaccompanied homeless youth as a result, select “Yes” to the “Do unusual circumstances prevent the student from contacting their parents or would contacting their parents pose a risk to the student?” question on the FAFSA form. You’ll be considered provisionally independent. You will be able to skip questions about your parents on the FAFSA form and submit it without a parent signature.

To complete your application, contact the [financial aid office](#) at the college or career/trade school you plan to attend to find out what supporting documentation you’ll need to submit directly to the school. Examples of supporting documentation may include the following:

- a documented interview between you and the financial aid administrator at the college or career/trade school you plan to attend
- a court order or official federal or state documentation showing that your parents or legal guardians are incarcerated
- a documented phone call or written statement from an attorney, guardian ad litem, court-appointed special advocate (or similar), or a representative of [TRIO](#) or Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) [grant](#) confirming your unusual circumstance and their relationship to you

Student Is an Unaccompanied Homeless Youth

If you indicate that you are unaccompanied and homeless or at risk of being homeless on the FAFSA form, you can complete and submit the form without providing parent information.

Look for the “At any time on or after July 1, 2023, were you unaccompanied and either (1) homeless or (2) self-supporting and at risk of being homeless?” question. Select “Yes” and indicate if you were determined to be homeless or at risk of being homeless by one or more of the following eligible agencies:

- A local educational agency homeless liaison, as designated by the *McKinney-Vento Homeless Assistance Act*, 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 the *McKinney-Vento Homeless Assistance Act*
- The director or designee of a Federal TRIO program or a Gaining Early Awareness and Readiness for Undergraduate program (GEAR UP) grant
- A financial aid administrator (FAA) who documented your homeless circumstance in the same or a prior award year

If you don't have a determination from any of the listed agencies, select "None of these apply." An FAA at your college or career/trade school will review your circumstance and determine whether you qualify as an unaccompanied homeless youth based upon 1) a written statement from you; or 2) a documented interview that confirms you are an unaccompanied homeless youth, or unaccompanied, at risk of homelessness, and self-supporting. The determination must be made without regard to the reasons that you are unaccompanied and/or homeless, or the circumstances that lead to your status..

What should I do if I have an unusual circumstance and can't provide parent information?

<https://studentaid.gov/help/unusual-circumstances>

This article applies only to the 2024–25 *Free Application for Federal Student Aid* (FAFSA®) form.

In situations such as the ones below, you (the student) may be able to submit your FAFSA form without parent information despite being considered a dependent student:

- You or your parent are incarcerated.
- You have left home due to an abusive or threatening environment.
- You have been abandoned by or estranged from your parents and have not been adopted.
- You were granted refugee or asylee status and are separated from your parents, or your parents are displaced in a foreign country.
- You are a victim of human trafficking.

- You are otherwise unable to contact or locate your parents and have not been adopted.

If your circumstances resulted in you not having a safe, stable place to live, you may be considered a [homeless youth](#), and should review the previous question about unaccompanied homeless youth