

Dan Clock:

My name is Dan Clock, and I'm here as a moderator, and I work in Federal Student Aid on some of these student and institution eligibility issues, so that's why I'm participating today.

Just to let you know a little bit about myself, I've been at the department for a little over 12 years, and before that, for many years, I sat where you are doing the work at various financial aid offices from Maine to Wyoming. And the rumors that I couldn't keep a job are not true. I just like different situations.

[Laughter]

So I think we better get started because we have lots of important information and, unfortunately, our two experts here have a flight after this session, so we won't have additional time out in the hallway to answer additional questions, so we're gonna jump right into it. I'll let them introduce themselves to you, and thank you for being here.

Barbara Duffield:

Good morning. My name is Barbara Duffield. I am the policy director for the National Association for the Education of Homeless Children and Youth. We are thrilled to be here doing the sessions on homelessness. We've learned so much over the past 24 hours, and had some really amazing conversations with people. We do have a flight to catch at 2:10. Poor planning on our part.

But what I want to let you know is in terms of the resources, we have a number of resources that we'll be referring to during the course of the presentation and given that copies of 40 centers a page at the business center, we didn't make a ton of them, but I want to give you my e-mail address right at the top of the house so that if you would like the resources we refer to, you can send me an e-mail. Diana has already compiled it. I know it's awkward to start a session by giving out your e-mail address, but that's what we're gonna do.

So my e-mail is B as in Barbara, D-U, F as in Frank, F as in Frank, I-E-L-D at N-A-E-H-C-Y dot O-R-G. You can also Google me, Barbara Duffield and my title here on the PowerPoint, and you'll find that same e-mail address. But, again, it's B-D-U, F as in Frank, F as in Frank, I-E-L-D at N-A-E-H-C-Y dot O-R-G. And if you write "Higher ED resources list," at the top, we will get that out to you. It has links to all of the materials that we'll be talking about, and then we'll be going green, anyway, and you'll have something that you can then forward and customize for your

purposes. So with that little bit of business out of the way – and I will also say that Diana and I are both very OCD with our e-mails, so we're also happy to try to answer individual questions you may have about young people you've worked with in your communities.

So what we wanna do in this session today is cover these topics. We wanna talk about who these kids are, who these young adults are you who happened to be homeless, and also without a participant. So we'll look at that group of young people. We'll also talk about a piece of federal legislation, the McKinney-Vento Act, which is the primary federal legislation for homeless students Pre-K through 12, but is also very important for higher education as referenced in the Higher Education Act and some important people who are authorized under McKinney-Vento to be partners in higher education.

We'll spend a good deal of time talking about federal dens of homelessness. Again, very important because it's referenced bought in higher education and for FAFSA purposes as well as for pre-K-12. We'll look specifically at the FAFSA provisions on unaccompanied homeless youth and then we'll get into some best strategies, some best practices that we've learned about over the past three or four years in part as these provisions have been in to effect, and have we seen different communities and states take on different initiatives to implement them.

And we did have time yesterday for plenty of Q&A, so I hope we'll be able to get to some of the burning questions. I know we'll be able to get to them before the session is over.

So without further ado, who are these young people that we're talking about, unaccompanied homeless youth, and why are they homeless on their own? Primarily these are young people who are fleeing abuse or neglect, and it could be, and very often it is a neglectful situation where they're not being cared for, and so they end up having to leave or they end up being kicked out of their home.

So typically, you're looking at there may be drug abuse from the parents. There may be physically abuse going on. Perhaps one parent is incarcerated and the other parent has never been involved in their life. We have sometimes pregnant/parenting teens who are kicked out for that reason.

Many different reasons why home is not a safe, stable place. And

yet at the same time, these are young people who are not in foster care, so they have very many of the same living situations and the same characteristics and backgrounds as youth in foster care, but they're not at that time in the custody of the state. They may have had some experience in foster care while they were younger. We do have many people who were adopted, some before age 13, and then once they're 18 their adoptive parent kicks them out, or they're running away from a foster care placement, or they had a bad experience in foster care when they were young, and so they're really hiding, floating sort of between places because they don't want to get back involved in that system.

And then we also have a group of young people who are homeless and on their own, because the entire family became homeless. With evictions and foreclosure and job loss, we're seeing a lot of family homelessness on the rise, but then there's not space for the older student at the place where the family ends up. So maybe they stay at neighbor's place but there's only room for the younger kids, or they go to a shelter, but there's not room for everybody there, so the older student gets parceled off and then up someone else.

And sometimes, too, the parents are focusing their resources on the younger kids and basically say to the older student, "You're on your own," and that's how the young person ends up in a homeless situation.

As you can well imagine, this situation of being without a parent or guardian and on their own and homeless creates many barriers to getting an education, both at the secondary and post-secondary level, at all levels of education, and those are barriers that the federal legislation attempts to address. Some of them are pretty obvious, like not having financial means. If you're homeless, you're pretty poor, hard to support yourself, limited housing options. So when we talk about the definition of homelessness later, we'll look at where the instability in living situation creates tremendous hurdles to getting a stable education. If you don't know where you're gonna stay that night if you're going from place, to place, to place,

Some of our older youth, because they are self-supporting are really struggling to hold onto a job and go to school. We have a scholarship program at our session, and so every year, we get applications and essays written by students, and many of them are going to school full-time and working full-time, even in high school, and so that struggle to survive sometimes interferes. They

can't take the same classes. They may end up being late because they're really both fending for themselves, and also trying to get an education.

And then many of the same people, because there isn't any person in their life to say, "You gotta get up to school. I'm gonna drive you to school," they don't have that caring adult, that becomes a real barrier, too, just having the motivation and having the guidance of somebody who's basically assisting them and encouraging them and motivating them to go on and finish their schooling. They really have to do it for themselves.

And then when it comes to the FAFSA, of course, lack of parental information. So in an abusive situation, contacting parents is not possible, is not a good idea. It can be very threatening for the students, or it may simply be an impossibility if one parent's in jail, the other person is themselves out of the picture. So they really don't have access to the parental information that we be expected of any other student under age 24, which brings us to I'll give a little bit about McKinney-Vento and then Dianna will explain more about the federal legislation, that pre-K through 12 legislation.

But McKinney-Vento Homeless Assistance Act is the probably federal legislation on homelessness, and there's subtitle that's specific to education. This is Education for Homeless Children and Youth Program. It's its own statute, but it was amended most recently as part of No Child Left Behind and will be, again, reauthorized whenever the Elementary and Secondary Education Act is reauthorized. So this applies to public schools throughout the country and so the main themes of it are really addressing all of those barriers, addressing the mobility, addressing the access problem, addressing the lack of support that students in homeless situations face.

And as Diana will explain, even though there are some very clear rules in McKinney-Vento, so much of what we do because life is composed of shades of gray, so, too, is how we implement the legislation. So you'll hear us refer to repeatedly our mantra, "Child center, case-by-case decision making."

So looking at this definition of homelessness, who's eligible for those McKinney-Vento services? The federal definition of homelessness for educational purposes and for many other family and youth programs, there's an umbrella term of, "Children and youth who lack a fixed, regular, and adequate nighttime

residence.” So that’s the global umbrella term of the definition.

But then within that, education statute actually breaks down and gives some of the very specific situations that are covered by that definition. So specifically included in the definition of homelessness is children and youth who are sharing the housing of others due to loss of housing, economic hardship, or a similar reason. So the last part of the phrase there is really important. It’s not everyone who’s staying with everyone in a stable voluntary situation. We’re looking at due to loss of housing, economic hardship, or a similar reason.

That’s frequently referred to, you may hear people say “doubled up.” You may hear them say, “Couch surfing,” going from place to place to place. And this is really the majority of students who are homeless in our country today. We’ll, look at that in just a moment as to why that’s the case. But in 2009-2010 school year, the US Department of ED’s data collection from public school show that over 70 percent of the students identified from homeless were living in that particular situation. Again, it’s very fluid and there’s a lot of instability built into that. And these are students who are also pretty invisible as well.

The second category that’s covered in the definition is living in motels, hotels, trailer parks, camping grounds, due to lack of adequate alternative accommodations. So the past two nights, I was a guest at the MGM Grand in the west wing. I would not have been considered homeless. I have adequate alternative accommodations, but many other people do not. Sometimes people will look at this definition and see the word “camping grounds,” or see the word “trailer parks,” and ask you, “Why are you saying that trailer park is homeless?” That’s not what this is saying. I grew up in rural Michigan. There were plenty of fixed, regular and adequate trailer parks that were perfectly good house, but if it’s due to lack of adequate alternative accommodations, then it may very well fit the decision of homelessness. But it’s not gonna be all of those situations.

Shelters, perhaps the most obvious situation of homelessness, or most easy to identify I should say. But, again, this was only 19 percent of the students that were identified as homeless by public schools in the ’09-’10 school year, and it’s percentage that’s going down because while homelessness is increasing rather dramatically, the shelter space is not. The funding level for homeless programs we’re not adding new beds as the need increases, and that means people have to find other places to stay,

but that's part of the definition.

Awaiting foster care placement, also part of the definition of homelessness. This is not defined in the federal law. It's gonna be different depending on the state that you live in, so our best recommendation here is to check and see if your state has interpreted the definition of awaiting foster care placement. But generally speaking, it's those emergency foster care placements that are intended to be very short term.

And the other situations that are covered, cars, parks, abandoned buildings are ones that may, again, be more obvious.

And then lastly, in terms of our definition, migrant students who are living in the situations that I just described with meet the def. So it's not by virtue of being a migrant student. They have to also live in one of those situations that are described an unaccompanied youth, youth who are not in the physical custody of a parent or guardian, if they're living in one of those situations, then they also meet the definition of homelessness.

So this is a broad definition and it doesn't fit a lot of the stereotypes. When hear the word, "Homeless," what image that conjures up in our mind. But it's important to understand that we have this definition of homelessness in federal law because it is the reality of homelessness among children and youth in our country today.

Shelters, if they exist, are often full. I know in the DC area, Fairfax County, Virginia, for example, there's 100 families on the wait list for shelter, and it's gotten worse with this economy. So if you do have a shelter, they're often full. There may be waiting list. There may not be shelters in rural areas or suburban areas, so that's not an option. And then shelters, too, will sometimes have very restrictive ruler. So very common, for example, for a shelter to say that if you're a mother with an adolescent boy, you can't stay there. So then the mother is faced with the choice of "Where do I go if I want to keep my son with me?"

Sometimes shelters won't take unaccompanied minors, or they'll have a certain age limit. And then sometimes, too are unaccompanied homeless youth even the transition-age youth, will be very fearful of an adult shelter. So again, I mentioned we have a scholarship program, and I've worked with many young people who really needed to go into a shelter and there was one, but it was an adult shelter and they were just terrified and they been in a

shelter when they were younger and it was not an experience that they would repeat.

So all of those situations, plus the fact that are kids are often fleeing in crisis, and so it's not that they have time to sit down and take out the yellow book and say, "Where's the Y?" so they sort of land where they land and the reality is that shelters are the tip of the iceberg and this definition really encompasses the homelessness situation.

Okay. I'm going to stop there and turn it over to Diana who will talk a little bit about the McKinney-Vento program and its structure.

Diana Bowman:

Good morning. I'm Diana Bowman, and I'm with the National Center for Homeless Education, and we're at the US Department of Education's technical assistance center in the area of homeless education, and we'll be sending you information and ways to contact the national center, and some other resources.

I'm gonna talk a little bit about the structure of the McKinney-Vento program and it starts at the Department of Education. There is an Education for Homeless Children program, and there's a coordinator over the program at the Department of Education. And then every state at the State Department of Education in most cases it's at the State Department of Education, there's a state coordinator for homeless education.

On your slides here, and what will be posted on the website as well, is a way that you can find out who your state coordinator homeless education is. Many of you have not had an occasion to contact this person, but this is a really good resource for you to help get a picture of the homeless education program in your state, the numbers of homeless children and youth in the state, and resources available for them. So I would encourage you, if you haven't made contact with this person, that you do so.

And then every school district is required by law to have an action plan person. We call them the local liaison for homeless education. Every school district has this person who is the primary contact to help homeless students enroll in school and be successful in school. Again, as you are working with identifying and verifying the status of homeless students or homeless unaccompanied youth, this is a person that you may want, or in different schools that you may want to be familiar with. You can contact the state coordinator for homeless education and they will

be glad to provide you with who this person is in the school district that you are interested in.

The homeless liaison serves a really instrumental purpose in serving homeless children and youth. This person helps with the identification of the youth. And as many of you know, it's really hard to get a fix on just how many unaccompanied youth or homeless youth that you really are dealing with. They tend to be un-invisible. They may not even know that they would fit the definition. And so by law, the local liaisons are required to be very proactive in trying to identify these young people, and also to create awareness in the community among different types of service providers and community organizations that these youth exist, and that they are provide with services and rights as they are enrolling in school.

And then the local liaison is the person who works with each of these youth to remove educational barriers, to help them be successful in school. And a large part of what the local liaison, go beyond what they do within the school system that we know that the needs of these youth are so vast that they need many referrals and connections to community agencies and other types of support services throughout the community.

So just looking at what the McKinney-Vento Act provides for these students, one of the most important provisions is that it allows homeless students who are enrolling in public schools to be enrolled immediately, even though they may not have records with them that are typically required for enrollment. We know that this is really important for homeless families and children and youth because many of them are so mobile and are acting in many times out of crisis that they don't have time to collect their belongings. They don't have time take their records with them. And so one of the heart and soul of the McKinney-Vento Act is that we want to create as little educational disruption for these students as possible. And so they are allowed to enroll immediately in school while the school system helps find the records or obtain the records that are needed.

Another key piece of the McKinney-Vento Act is to provide for school stability for these students. So when homeless students enroll in schools, they can enroll immediately in the area where they are temporarily living, or they have the right to stay in their original school if this is feasible and in their best interest. And if so, this school district provides transportation to and from the school of origin. And the McKinney-Vento Act also provides for

academic support for these youth. We know that as homeless youth and children are very mobile and moving around and changing schools and dealing with elements of crisis in their lives, quite often they fall behind in school, and so they need that extra bolstering and support. And then to ensure that any services that are provided to all students in the school system, comparable services are provided to them.

So looking at probably most relevant for the work that you do, we're looking at unaccompanied homeless youth. And for these youth, we're looking at two criteria. One would be youth that have a living arrangement that meets the McKinney-Vento definition of homeless, the one that Barbara went over in all those different examples. In many cases, probably in most cases, these will be youth that are living doubled up.

And then also they have to be unaccompanied. Now the definition of unaccompanied that's in the McKinney-Vento Act is that it's a youth that's not in the physical custody of a parent or a guardian. It doesn't say legal custody. And what this means, in effect, is that you have a youth that is not living with a parent or a guardian. So as you're looking at the FAFSA and looking at ways of working with these youth for purposes of applying for the FAFSA, they have to meet both of these criteria.

One of the questions that we get quite often what if you have a youth that chooses to leave home. Many cases, we hear of situations where people are saying, "Well, this is a youth that has a perfectly good home to live in. So do we have to consider this an unaccompanied homeless youth?" and the answer to that is that a youth can be eligible whether or not he was asked to leave home or whether or not he chose to leave. And what know about our unaccompanied youth – and research bears this out, as well anecdotally the youth that we have encountered is that in many cases, what the youth will tell you is only the tip of the iceberg.

In many cases, these are youth that are living in very intolerable circumstances, circumstances of abuse, circumstances of conflict. But because they're coming to a program or an agency where they don't know the adults they're talking to, they're not gonna tell you very much. They're fearful of the implications of what they say, and until that level of trust is established, they're really not going to give you as much information about their circumstances that would necessarily warrant this being more than just a youth choosing the leave home. So just you away need to be mindful that sometimes what a youth will tell you is just the tip of the

iceberg.

So from an educator's perspective, the roll of the educational agency, whether it's the K through 12 schools or whether it's a higher education agency, is to enroll and educate the youth in accordance with the federal law, that you don't need to understand why the youth left home. You don't even need to agree with why the youth left home. But if the youth meets the definition of a unaccompanied youth, then the youth is accorded the rights and services under federal law.

So let's see what this looks like in terms of a fairly typical kind of scenario that we encounter with our homelessness unaccompanied youth, that a youth – we'll look at Sarah was kicked out of her house after graduating from high school. She couldn't get along with her stepdad and said that the level of conflict had gotten out of control. She's been living with a friend whose mom said she had to leave at the end of the summer, and she has no contact with her parents.

Now just very basically from what we've looked at so far, how many people would consider Sarah a homeless unaccompanied youth? Okay. We see a lot of hands raised. We see a lot of hands that are not raised. But just to process this just from what we've looked at, this would probably be a case – and I think you always want to get as much information as possible, and there may be some details that you want to find out a little bit more to be able to make that determination, but based on what you have here, you have a youth that is on her own. She says that there was some conflict in her home.

You don't know the level of that conflict. In many cases, when youth will tell you that they can't get along with the people at home, they're may be a level of abuse that is either emotional abuse or even physical abuse, and so that would be something that based on what the youth has told you would definitely raise a red flag that maybe her home is not the safest place to be. So definitely she is an unaccompanied youth.

Now she's been living with a friend but it looks like it's not a real permanent arrangement. This is a situation where the mom has actually said that, "You can stay here for a little while but at the end of a certain period of time, you're gonna have to leave." And so with that kind of temporary arrangement in mind, this would be a situation that would fit that criteria of living doubled up to adequate alternative living accommodations. This is something –

it's a temporary arrangement. And basically, what we find with so many of our youth that are living doubled up, they don't have a whole lot of control over when somebody will tell them that they have to pack their stuff and leave.

Sometimes staying one or two months is really a luxury for these youth, but in many cases, it's less than that where almost at the whim of the person they're staying with they can say, "This isn't work out. You have to leave." So this would be a fairly typical situation that we would consider as an unaccompanied homeless youth.

So with this, I'm gonna turn this back over to Barbara, and we gonna tie this in with looking at unaccompanied youth that would be eligible for an independent status.

Barbara Duffield:

With the passage of the College Cost Reduction and Access Act, unaccompanied homeless youth were added to the definition of independent student, which I'm sure your all well aware since it's been several years that it's been in place. To unaccompanied youth, youth who are homeless and unaccompanied in the year in which they're submitting the application, verified as unaccompanied and homeless by the liaison or other parties that we'll talk about in a second, or homeless and self-supporting. So this means that that barrier of accessing parental information is removed.

The College Cost Reduction and Access Act uses the same McKinney-Vento Act definition of homelessness. So that broad definition that we talked about applies for this purpose as well, and it also according to the application and verification guide, which we'll be citing quite a bit in the next part of this presentation, students who are living in dorms, but we be homeless without the dorm, are also considered homeless for purposes of the FAFSA.

In terms of students who are unaccompanied and at risk of homelessness, the application and verification guide states that is when a student's housing may cease to be fixed, regular, and adequate.

The situation of homelessness – again, this is coming from application and verification guide – also includes students who are fleeing an abusive parent, even if the parent would provide housing and support. And I just wanna say what is so common in this situation is that unaccompanied homeless youth may have contact with some parent. So it may be the new boyfriend or the stepdad

where there's an abusive situation coming and the biological parent says, "Yes, you can come back." Yes, they can come back, but the student knows if they go back, they know what's gonna happen. So that's not at all an uncommon situation where there's some level of contact, but it's still not a safe place to be, because of one of the other adults that's in the house.

The determination of homeless status. So, again, a youth who's unaccompanied and homeless who's verified in the year that they're submitting an application as an independent student. The determination of homeless status, there are four parties in the statute who are authorized to verify that status as unaccompanied and homeless. The first is the local school district liaison Diana talk about. This second is a Runaway Homeless Youth Act funded, the director of a program, or designee of that program. The third is a HUD-funded shelter or designee of that program. And then lastly, college financial aid administrator.

And I'll talk in a second about some of these other parties, but I just want to say some of the reality of what we've seen over the past three years. Many of the students who are attempting to go to college who are unaccompanied homeless youth, the liaison may not be the person who can verify them for a couple of reasons. One may be that they were below the radar. The liaison never knew that they were homeless while they were in high school.

There's gonna be a congressional hearing on December 15, and I'm helping to vet some of the student witnesses, and so this morning I talked a young man who's now 24, but I asked him if anyone in high school ever think he was homeless. And he said, no, he was going from family member to family member and in his words, 'cause he wanted to sort of spread the burden and not be a burden on any one person. But I asked if anyone at school know, and he said, "No, because I didn't want to call any attention to my mom." So even though it's an abusive situation, it's still his mom and he didn't want anyone involved, so the liaison in that case, didn't even know that he was homeless.

Also, we have young people who become homeless after high school. So while the liaison is a critical person to have a relationship with for all sorts of reasons, that may not be how a student can get verification.

What we're seeing, as I mentioned before, is that many students aren't staying shelters, or not federally funded shelters. So that makes the role of the financial aid administrator absolutely critical,

and that the financial aid administrators are making many of these determinations and really having to make the determinations because the youth can't get the determination through the other three parties.

So we've talked about the liaison, but just to give you more information, HUD-funded shelters are one of the authorized verifying parties. So the US Department of Housing and Urban Development, this is the federal program that funds emergency shelters and transitional shelters and it is distributed throughout the United States through what's called a continuum of care.

On the resource list that Diana will e-mail out, or I guess I will e-mail out. We will jointly e-mail out to you, we will give you a link on the Department of Housing's website where you can find where are those in my area. How do I know of a shelter? I know of St. Joe's place, or I know of Project Connect but I have no idea where the federal funding stream is so. You can click on a map of the United States on their website and find out who are your HUD-funded programs.

It's also important to know because you may have students who need help and need a place to stay, and you need to connect with the shelter providers for a different reason.

The other authorized party, the Runaway Homeless Youth Act program – this is a federal program administered by the Department of Health and Human Services, specifically for runaway and homeless youth. It's this very small federal program, so there may not be grantees in your area. They provide street outreach, also basic centers, and transitional living programs. But, again, in the resources that we'll e-mail out, they also have a website where you can go to your completely and see do I have any of these funded programs.

Obviously, if a child is staying in a shelter that's privately funded, a Gospel mission, or a Y or someplace else, they still meet the definition of homeless, but that shelter director is not authorized automatically under the Higher Education Act, to do the verification.

So talking about how this is playing out in some really, really important guidance that the US Department of Education has provide and the AVG, really can't emphasize enough to go to Page 26 to 28 on the AVG. Just bookmark that and when you go back, and read those pages very carefully because they provide some

really important information to help implement this.

If a student does not have and cannot get documentation from one of those three parties listed in the law, the financial aid administrator must make a determination of eligibility based on the legal definitions. So this is not professional judgment, nor is it a dependency override for youth who are unaccompanied and homeless and under age 21. That is one of the most important pieces. We've had many, many conversations over the past 24 hours about this particular piece. It's a determination that must be made by the financial aid administrator if the youth can't get it through any of those other three parties.

We do have some complications in terms of the age issues, and I've heard various things about this maybe being resolved next year. We'll see. But the application and verification guide defines youth as 21 and under for unaccompanied homeless youth. So 21 and under, the policy that I just stated is in effect, but we have kind of a gap for a 22 and 23 year old unaccompanied homeless youth who don't fall under the definition of independent student, and then it would have to be – in that situation, it would have to be dependency override for those particular young people. And, again, I've heard various things about hopefully this being addressed in the future. But that's what's in the current AVG on age issues.

In terms of the verification, I'm gonna turn it over to Dan to talk a little bit about this next bullet.

Dan Clock:

_____. Technical difficulties. The distinction I wanna make on this first bullet is if we think of our normal what I'll call traditional verification process – we think of the verification worksheet, and verification occurs in one or two ways. Typically, it's we set the asterisk code to identify a student who has to go through verification, or because of information that you have, the institution selects a student for verification. That's the traditional sense.

But what this is referring to in this first bullet here is verification – and this is what we need to fill in the blank – of the three homeless questions Items 55 through 57, on the 2011-2011 FAFSA, is not required unless there's conflicting information. So that's the distinction. Anybody have a question about that? We're just talking in this first bullet that verification of the three homeless questions is not necessary, unless there's conflicting information. Then you'd have to do verification there, too.

I don't want you leaving here thinking that our traditional verification is excluded. We're not saying that. Thanks. Oh, question? Yep.

Audience: _____ letter from the students. So are you saying we don't need to do that as long as there's no conflicting information, if they just say that they've been certified by the high school _____?

Dan Clock: I'll repeat the question. The question was do we or don't we have to collect the McKinney-Vento letter when a student selects one of those three homeless questions. Most of the information on a FAFSA is self-reported information. Unless you have reason to believe otherwise, you can accept that as self-reported information. Do you know another reason? No? So thank you for your question. And to reiterate, no, you don't need to collect that unless there's conflicting information.

Barbara Duffield: And I have had a couple questions again and I'm so glad Diana had a table up so we could have some individual conversations. But I have had some conversations where a financial aid administrator got a letter from a liaison and was questioning their determination. Like, "Well, I know some things about this student." And what the application and verification guide says is that it's not conflicting information if you disagree with the liaison. If you disagree with the liaison, you need to talk to the state coordinator 'cause that's the oversight for that liaison. So there may be reasons when the liaison made the determination that you don't know, but disagreeing with their determination in and of itself doesn't equate with conflicting information. So I've had that conversation, too.

But the other conversation we've had quite a bit in the hallways is about youth who really don't have anyone. We encourage, for example, if you're the financial aid administrator and you're making the determination, you may say, "Okay." You've talked to a counselor I have information from a pastor or an employer. But there may be youth who are living in their car who are totally disconnected from anybody, and you can make a determination based on a documented interview with that student. That, again, straight outta the ABG guide. You can make a determination based on documented interview.

I mentioned in the last session and we will add a link on our resource list that no university has actually taken this to – Diana's organization has a great fact sheet on how to apply the definition

and what are some sample questions you can ask. Like how do you sensitively ask for information about a living situation, where it's fixed, regular, or adequate? They took that fact sheet and they made it into almost an interview questionnaire for a student. So I think that's a great idea to do, not a questionnaire that you just sort of take the student's answers and decide, but you'd really sit down with the student and walk through that. And that could be then something that helps you make that documented interview determination.

It's also really important to emphasize – and this, again, is in one of the bullets in the AVG, is just the exercise of sensitivity around some of these issues. We've had young people contact us over the past couple years who were asked for things like copies of a parental death certificate or the student left home because she was abused before age 16, and the school wants a copy of the police report. That's actually sealed. She can't get it. So just understanding that some of these situations, having to track down and get some of that confidential information is gonna be difficult, if not impossible, and we're concerned about the extent to which we hear about it, but we're also concerned about students who are just are asked for that, and then they just walk away and give up on education, even though that's their best ticket out. So important to just be mindful of all of those issues as well.

The importance, too, about consulting with people who've been working with this, so one of the pleasures of the past 24 hours was being what I'd like to think of McKinney-Vento matchmaker. So if I know you're from Kansas City, Missouri and I know **Stacy Pratt**, we can put you in touch with people. If you don't have a relationship with the local school district liaison or the shelter providers are the state coordinators, they can be helpful, even if they're not authorized, even if the student is out of high school. If you're wondering, "Does this meet the definition? Doesn't it meet the definition?"

Someone to talk through, of course, we're very happy to walk through individual situations with you as well, but those partnerships can be helpful, so just encouraging you reach out to the service providers and the schools district McKinney-Vento personnel in your area. And just lastly, to note that according to the AVG, eligibility determinations can be appealed to the US Department of ED. As far as I know, that hasn't happened yet, but that's a recourse that students have available to them as well.

The last piece I want – no, I think I shall turn it over to Diana so we can get to questions.

Diana Bowman:

We love using scenarios because we have so many of them, because we get calls every day. But I think they also help you apply what we're learning here. Let's look at another student, Samuel. Samuel's mother died the summer before his senior year in high school. He has no contact with his father, and he's been staying with different relatives and friends. No one has been willing to assume legal guardianship or provide financial support.

So, again, would this be a student that you would consider an unaccompanied homeless youth? Probably. You do see certainly, he's not in the physical custody of a parent or guardian, and it looks like his living situation is not very stable. And this would probably be a fairly typical type of situation that you would have a student coming to apply for federal financial aid.

So in trying to determine whether or not he would be eligible for independent student status, could the local liaison determine Samuel's – here, I'm thing change the wording a little bit – his eligibility under the McKinney-Vento definition so that you could make the independent student determination. And the answer to that would be if Samuel was identified in the school where he attended as an unaccompanied homeless youth, then that would be a fairly simple verification process.

But let's say, for example, and really this is the more typical kind of situation, what if the local liaison did not identify Samuel as an unaccompanied homeless youth while he was in high school? Again, Barbara mentioned the situation where many of these youth are those that don't want to disclose that they're homeless. Many of these youth don't want to be stigmatized. They want to fit in with their peer group. They want to appear to be as normal as possible, or they may be protecting family members. And so in an you of cases, you have youth that will not disclose this information or you might have a youth that did not become homeless until after they graduated high school and they were still in that window where they're under 21, in which case the financial aid administrator must determine Samuel's eligibility.

Now what the local liaison could do is to help you make that determination, and as Barbara said, we're trying to promote as much collaboration as possible. This could be a person that could help you look at the definition and to try to determine how it would apply or what additional questions you might want to ask in order

determine that status for the student.

So I'm nothing move into looking at a little bit more supporting the unaccompanied homeless youth access to financial aid. One of the recommendations that we have, and, again, this resource list that we keep referring to, there is a simple template that we'll send you link to, but it's something that you can create on your own as well. It's very basic, where it would be that sheet of paper where it's almost like a checklist. This is the student. This is what his situation is. And he was verified by the local liaison, by someone from a shelter, or I made this determination based on this information. So this would be something that would just be something to sort of have that paper documentation that would be sufficient. And, again, we ask you to become familiar with and learn who your local liaisons are in the area where your college is located.

And then, also, just to even take that collaboration to another step, to participate in trainings with the local liaisons, _____ the local liaison to come and talk to folks in your office as well as other people on your campus, to help them become more aware of the needs of unaccompanied homeless youth. And by the same token, it would be hugely helpful for – and I know many of you go to high schools already and talk to school counselors – but to make sure that the local liaisons are included in those trainings as well.

And then some things that you can do on your own campus that take it a little bit beyond just helping the student access financial aid, as I mentioned before, many of the students, you may have students on your campus that would fit this definition, and don't even know. It would be helpful to post information throughout your campus so that these students could realize that there would be a source of support and help available for them. Some sort of poster, and we'll send you an example of this in that resource list. And also to create that level of awareness among faculty and staff.

In many cases, in your office – and in a lot of cases, you're sort of front line people that become aware of these students through the financial aid process, but in many cases we have faculty and staff that get to know their students and they know when something happens in a student's home life that they lose their housing, and so the faculty and staff should be aware of the resources and support for these students as well.

And then to be aware of types of support that would be available

on campus for these students, as well as community support services. I know a lot of the work that our liaisons do are to make referrals to the community or food stamps, for housing, for other types of support for the students. And you should be familiar with community resources as well, so that you can make these referrals for unaccompanied homeless youth.

One of the challenges that we mentioned earlier is that with these youth on their own many of them have been disconnected from a significant adult in their lives for a very long time, and when I think about the kinds of things I was thinking and doing when I was 18, I certainly could – I needed and did have the support of an adult kind of steer me in the right direction, to help me make good decisions. And for our youth that are unaccompanied and now with their parents, it would be very good to think about establishing a mentor program on campus where these youth that are in these situations could have an adult that they could talk to, someone that would just check in with them occasionally, see how they're doing on their grades, seeing what challenges that they're facing.

And, again, establishing coordination among the financial aid office, the student support services, and campus housing. What we're finding a lotta cases is that in many cases when the financial aid office becomes aware of these students that you're helping to determine them as independent students, that's kind of where it ends. We hear from student supports services on campuses quite often saying that, "We have no idea who these students are." And so realizing, trying to figure out who needs to know on your campus once you've identified the student, what kind of support system on campus can be created so that there are other services made available to them, not the least of which is someone to kind of oversee the housing situation for these students.

A number of colleges and universities have worked with their service organizations on the campus to establish a food and clothing bank on campus for students that need this type of support.

And then one of the biggest challenges for our unaccompanied homeless youth is that they have very unstable and temporary housing. One of the things to think about if you're a campus that has dormitories is that what happens when the dormitories close. We know that many of our unaccompanied homeless youth when the dormitories close, they're on the street. They have to go to a shelter or they have to find someone to stay with during that period

of time. Many of them are able to do so. Some workout well. Some placements don't work out so well, and so this is a time of very unstable housing for these youth, even over the summer.

Many of our youth leave the dormitories in the spring semester and have to go straight to a shelter. So just to be mindful of that and think about some things that could be done. Many colleges and universities leave dormitories open over break time so that – and this is a practice that's come about serving students that are from other countries, but this is something that our unaccompanied homeless youth could benefit from as well.

Another program – it's not listed here, but something that we know of that is becoming a practice in communities and in K through 12 schools, as well as colleges is having a program of host homes for unaccompanied youth. And this is having a list of people that would be willing to have a youth stay with them over a break so that when you have those breaks – and this is important if you have a dormitory where students are leaving or are not able to stay over break, to have a place where they can stay during that break.

And then another thing to think about is convening a meeting. We know of a couple people that we've talked to here and we know of other colleges and universities that have actually initiated a partnership where they've contacted homeless providers in their community just to create sort of a taskforce to look at what the needs are, where the gaps are, and how people can really come together to try support each other and to support the youth living in these situations. And even going so far as developing an action plan. We piece of this challenge is everybody going to take.

So that's really sort of the end of our slide show here, and with that I think we're ready to open this up to some questions. And I see that we have mikes around if you would like to walk to the mikes and ask some questions. Between the three of us, we'll do our best provide some answers.

Yeah, we can hear you.

Audience: Okay, good. I do the independent –

Diana Bowman: Actually, we can't hear you. Hold on for a second.

Audience: Hello. Testing. It seems to be on, right?

Dan Clock: Just speak loud.

Audience: So I do independent appeals at my school, and it's really clear from the ones that I've gotten this year that Child Protective Services has gotten involved in several of my student's situations while they were in high school, moved them out of the home to relative's homes where the relative was willing to care for them until age 18, and then they were on their own. And the student was never informed by Child Protective Services about all of this homeless youth stuff, high school liaisons, no kind of notification. They knew nothing about it.

And I'm wondering what kind of work is being done with Child Protect Services to better educate them.

Diana Bowman: I wish I had a good answer for that. I think in some communities, the word is getting out, in some community's it's not. And in those communities where it's not, you can be a great ambassador now that you have this information. Our liaisons in the schools in many cases, they're also the ambassadors and they're creating those kinds of connections and community task forces to look at issues with unaccompanied homeless youth.

I think we are also working with child welfare agencies at the national and state levels to make sure that they're aware of the McKinney-Vento Act and the definition as well. But I think as you're running into those situations where they're not aware, this might be a good opportunity for you to work with the local liaison and maybe initiate that taskforce where people who are encountering these youth really are on the same page and understand the definition and the **sorts** of supports that are out there for them.

Audience: Okay. I actually have two questions. The first one, I just need clarification. You said for 22 and 23 year old students, we should be doing a dependency override for those students who are homeless. Did I capture that correctly?

Barbara Duffield: Yes.

Dan Clock: Yes, you did. And just as a reference, in case you wanna write it down, if you go to the 2011-12 ABG, if you go to Page ABG-27. It's the second paragraph that gives you that direction.

Audience: Okay. I just wanted to clarify because for professional judgments, it's just been drilled into us that we must have documentation, and so dependency override is a form of professional judgment and if

we don't have documentation other than the conversation with the student in our office, I just want to make sure that that was sufficient documentation to do the dependency override.

Dan Clock: And my answer to that would be you wanna have as robust documentation as possible while at a minimum the personal interview and your documenting of that and placing it in the student's file would be sufficient. But to the extent that you can corroborate that with other resources, other entities and they've given you a variety of examples, that would be useful.

Audience: Okay. My second question is should we be updating or actually correcting the FAFSA throughout the course of the school year if a student becomes homeless, or should they be?

Dan Clock: That's a good question. I haven't been asked that before, but you certainly could. There would be nothing prohibiting you from doing that.

Audience: Okay. Thank you.

Diana Bowman: That is a great question. And, actually, there is – not to confuse anything, but for students older than 24, I know that one of the specific factors that can lead to professional judgment during the course of the year is a loss of housing that leads to homelessness. That's sort of a separate and apart from the youth piece, but that's also in there as well.

Dan Clock: One other point on that. I'm just thinking regulatorily because that would be a change in the student status from the dependent to independent status, you're required to update that. So – and it's probably in 668.55, but in that series right through there, within verification.

Audience: Hi. I think you have answered my question somewhat. But my question is – well, my comment. I have a comment instead of a question. What we probably need is for the liaisons to be more active in collecting the documentation before the student comes to our schools. Because usually, that student is shying away from the financial aid office because their don't know what to do, and then it's regulation and you're trying to service so many students at one time, so this student is lost in the sauce.

So I don't know if that should be placed upon financial aid administrators to go out and contact these liaisons or if you guys can do that in an aggressive kind of an activity to make sure that

they are helping these students to have the kind of documentation that we need.

And my other – I do have a question. Say, for instance Samuel knew where his father was and he was incarcerated. That is another entity that does not provide the documentation that someone is incarcerated, like, for instance, like his father. So what do you do then? Are you in contact with these places, jails or whatever? Because it's so difficult to get that documentation that "I'm gonna be in jail and this is how long I'll be in jail," and stuff like that. So could you give me some comments or feedback about that?

Barbara Duffield: You wanna do the second one, and I'll do the first one?

Diana Bowman: Okay. Go ahead.

Barbara Duffield: So I'm gonna comment on your comment and then Diana will try to help to answer your question which is we've been really trying to get the liaisons up to speed about this. There are 15,000 school districts. There are 15,000 liaisons over that. Some of them, it's one job among many, so we have been trying to be aggressive to get that information out.

One new resource that we just released three weeks ago is an unaccompanied homeless youth toolkit. We made one for counselors, one for financial aid administrators, and one for service providers that have all sorts of information, how to do a FAFSA, a McKinney-Vento Week. So that is something.

And I will also say that as we look to the reauthorization of the McKinney-Vento Act, one of the senate bill passed a couple weeks ago as we look forward, is a proposed requirement for the liaison to let an unaccompanied homeless youth know about their status as an unaccompanied homeless youth for financial aid purposes. So hopefully, in the future that would actually be a requirement on their part as well.

Diana Bowman: And then your second question, getting back to the Samuel situation. One of the things that we work with our local liaisons to do and would be good practice for you all is to look at each student's situation on a case-by-case basis and you look at that living situation. And you look at is the youth unaccompanied just on the face value of this youth. He's living in a situation. He's bouncing around from relative to relative. So just on the basis of that, his living situation is both he's not in the physical custody of

a parent, and he's in a temporary living situation.

And the process for determining an independent student is one where as long as this information checks out and you ask the questions, the family yes, "Yes, this is the situation with this youth," you don't necessarily have to have that verification from the jail or whatever. You've got a wider range of things that you can use, and even for the purposes of determining the student as an independent student, the AVG says you can even use a documented interview.

Audience: Okay, thank you.

Dan Clock: I'd just like to make one other comment. I quickly checked in the regs about the prior question that was asked regarding a student's change in status sometime into the award year. And is **668.55a1II** where it says, "The applicant is required to update his or her dependency status in accordance with the provision of Paragraph D of this section." So if you wanna write that reference down, that might be useful to you, 668.55a1II.

Audience: All right. Thank you. _____ Montgomery College, Rockville, Maryland. My question is really concerning students who are dependent students who are living away from home, which they are foreign students. They are earning more fund _____ actually but their parents are earning in their foreign country. Now can we consider them as unaccompanied youth as well?

Diana Bowman: I think you would probably want to look at – I want to make an important distinction here that I think will be helpful for you. There are unaccompanied youth and there are homeless unaccompanied youth. And so sometimes that's kind of the tough thing to tease out. I would say that their parent are living in another country, but the students are living here, so, yeah, they are unaccompanied. But, you would want to look at their living situation. If they're earning an income, if their living situation is stable, then they would not be considered homeless, so they would not meet that part of the criteria. So just on the basis of that, I would say that these would not be students that would consider as independent student for the purpose of filling out the FAFSA.

Audience: Okay, great. The second portion is a lot of our students has been really – still have contact with their parents, but their sexual orientation, the parents really do not allow. They are kicked away from home. Can we consider them as well?

Diana Bowman:

I would so. And, again, look at every case on its own merit, but many of our students, and we find that quite often many of unaccompanied youth are those that have been kicked out of their home because of a sexual orientation that their parents don't agree with. So these are students, and they can have some contact with their parents. But, again, focus on the living situation. They're not living with their parents, and if they're kind of bouncing around and don't have stable housing, that's what you're gonna be looking at.

Audience:

All right, okay, thank you.

Audience:

Hi. Good morning. And thank you so much for bringing awareness. I do work in a very small school and I came across recently like the past three years more aware of our students in my school that are homeless. I did have a very interesting case last year – I mean, currently in this year. She's still enrolled in the school – of a student whose parents have been deported, and the student is a US citizen. And I just wanted to know how your organization, the department is dealing with minors. Are they considered as well homeless?

In this particular case, the student is actually living with an aunt who is in the country, and I don't know about any specific and no legal guardianship whatsoever. So where in your provisions are you looking at possibly the fact of all these immigration laws and changes with students whose parents are being deported out of the country and, therefore, leaving a lot of students homeless, literally. Has that been address? Does it plan to be addressed? Because even though I live in the northeast I know we're seeing the effect of all these changes in immigration laws, leaving the students really trapped and literally alone.

So you have any information? Do you have anything that perhaps you guys looking at?

Barbara Duffield:

Just sort of to confirm, we are hearing increasingly of students how are essentially left homeless when their parents are deported, under age 18 and over age 18. And a student in that situation who's staying with an aunt and the aunt doesn't know how long this is going to last, that situation – the student may either meet the definition if the aunt has just sort of taken the student in at the moment, is not supporting them. And it may also be a situation where you can consider that a youth who's unaccompanied and at risk of homelessness because the aunt's not really supporting them in the same way that parent might support them.

So in terms of work that's being done on the topic, one of our partner organizations is called Kids in Need of Defense. And that's one of our organizations to look for. They're primarily helping students 18 and under, but they also do some connecting of students who are older than 18, too. And we issued a report with them called – I forget the name of it. But it's about undocumented, unaccompanied homeless youth. So that's on our website as well. But the organization is Kids in Need of Defense.

Audience: Okay. And if you can provide the statistics of which stats have the highest rates of –

Barbara Duffield: That, I don't know.

Audience: You don't know?

Barbara Duffield: I don't know. They may know. I don't know.

Audience: All right, thank you.

Audience: Okay. Can you hear me now? I think you may have answered my question with the other gentleman, but I just want to make sure on the term on the word "unaccompanied," just because – and the description of it, it always makes it that unaccompanied homeless youth would be if there's a break in the relationship, the parents kicked them out, they left, they're living in a shelter or incarcerated. In the situation where if the whole family is homeless, due to maybe their house burned down or natural disaster, but they can't live in the same area.

They have to separate, but they're still communicating. They're still in communication and they fall in the early age group. Would they still be considered unaccompanied if my parent has to live over there just because there's not enough room or me. I have live over here. We still communicate. We're still in contact, but I can only stay at different places for short periods of time.

Diana Bowman: Yeah. I think there are actually two situations, two scenarios that I wanna point out here. One is what you're describing is a situation where the whole family's homeless and for whatever reason – and Barbara mentioned some situations where the family is staying somewhere and they're saying, "We don't have room for you. You're old enough to take care of yourself, so you really have to go somewhere else." That's still a youth that's not living in the physical custody of a parent or a guardian, and is still not stably

housed. And so I think in that situation, I would consider that a homeless unaccompanied youth.

Now there are some situations where a family becomes homeless and within that family unit, there is a youth that is 17 or 18 and they may even be staying with their family. That would not be – in that case, the youth is not unaccompanied, and so for purposes of filling out the FAFSA, it would still be the parents' income. But given that the parents are homeless, that they probably have virtually little or no income, that I think it would really be about the same eligibility for financial aid that we're looking at here.

Audience: Okay, thank you.

Audience: Hi. Just what I hope is a quick question. If a student's been deemed an unaccompanied homeless youth, is that a status for the financial aid purposes that's permanent, or is that something that gets _____, because situations could change?

Diana Bowman: Yeah. That would need to be verified every time they apply for the FAFSA on an annual basis, at least.

Audience: Although _____ maximum eligibility for Pell grant and probably state grant, usually no matter what the school, what the price tag, there's not enough _____ for everything. What's your experience with homeless students borrowing? Is that a possibility? Bad idea?

Diana Bowman: I'm sorry. We didn't hear you up here. What is the possibility for homeless students what?

Audience: Borrowing money.

Diana Bowman: Oh, borrowing money.

Dan Clock: It would be no different than any other student that's applying for aid. They could get a full – every type of Title IV aid that we offer. Now I'm not responding you in terms of experience that I've had with homeless youth. I've had a minimal amount of experience with that. But they would be able to apply for and receive any type of Title IV aid.

Audience: I understand their eligibility. My question is it smart? I mean, we did ideally try to keep the amount of borrowing to a minimum.

Barbara Duffield: Right. Well, I can share our experiences from our scholarship program, which we do have some students who – and, again, I am not a financial aid expert, but who have had difficulty with things like Parent PLUS loan, where they don't have anyone who can sign and that becomes another issue _____.but in terms of the wisdom of it, is it a good idea for these students. Some students, this is just their only –

I'll give one example of a young man who for all practical purposes you would have look at this homeless youth and said, "You should really be in community college. This is where you're probably gonna do better. You're not gonna have to take out as many loans. You're gonna –" but for whatever reason, he was totally drawn to a school, a private school in another state where he felt like he had family and he had support. And in that individual for that individual young man, the borrowing made sense because it was where he was gonna live. It was gonna be like his family.

So I think, again, with our mantra, is it really is case by case. You have to look at the individual student's assets, what they have, what their likelihood is, and also kind of is this the moment at which that borrowing makes different between going to school or not going to school based on what they perceive their needs. It's just really individual.

Audience: Thank you.

Audience: Hi. At the school that I work at, we've generally practiced that a student's parents or families unwillingness or inability to be able to contribute is not a reason for dependency override. But in a lot of cases that causes friction in the family if the parent cannot afford to help the student. So the student will financially choose to financially be independent from the family. But in this instance, now the student has become kind of a drifter and a bouncer, so if we're telling students that their parents inability to help them does not make them independent but then we can let them claim homeless and not give any documentation, I'm worried about mixed signals that we may send to differing students for our populations.

Barbara Duffield: I would just say I think what's really important is to go by the legal definition. So if the student is in a situation where they are homeless and they meet that definition, and they're unaccompanied, then that's their independent student status. There's no way that student's gonna go to school without that, because there's no way they can get that information.

If think what pointing out, Sue, and in again in conservative we've been having is it does become difficult because you may have students – and I don't know how common this is – who think, “Oh, wow. If check ‘homeless,’ then I can get around that somehow.” And that's really where you're gathering information to the best of your ability. A student who has a parent with an income who should be supporting them is different than a student who is living in homeless situation where they just can't get that information, or _____ of that. So it does require you to get to know the students a little bit better and let them what the consequences are if this isn't truthful information as well.

Audience: Okay. Thank you.

Audience: Hi. Could you possibly tell me what documentation we can collect from the student who decides to leave the home on their own without being forced out for whatever reason? We find a lot of students who give fraudulent information if their parents are making a lot of money. So in order get the Pell grant funding or that type of award or that type of grant funding based on their income, what information can we collect from the student to say that they are legit, that they have – they did leave for the reason other than that? We're not just trying to make up an excuse –

Dan Clock: Can you step a little closer to the microphone?

Audience: I'm sorry. Could you hear me now?

Dan Clock: Yeah.

Audience: Okay. Students who – the question was students chose to leave out of the household without being forced out to be described as unaccompanied youth. We have some students who give fraudulent information on their FAFSA. Their parents are making a lot a large income, so they don't qualify any of the like, for example, Pell grant funding. So to make sure that it's legitimate, what information do you suggest that we ask from students?

Diana Bowman: Yeah, I think you really wanna try to figure out if this is a student – again, we're looking at students, they say that they may have chosen to leave home, and in some cases, we know that some fraudulent things do go on. But I think you look at the living situation where is this truly a youth that is homeless, and you wanna find out from the youth. Are you in a situation where you don't have adequate living – a stable living situation? You want to

say, “Where are you living right now? Are you living with a friend? And is this a permanent arrangement? If you weren’t living with this person, where would you be living?”

If they don’t indicate that they are in a particular dire situation, then that would raise a red flag for me to say maybe this isn’t a situation that is truly homeless.

So, again, I think it bears conversations with the students and the more you talk to them if it’s a situation that isn’t truly homeless, that’s gonna come out. But I think it’s a conversation that it’s not just “Answer this one question and I’m gonna make the determination.” But if something raises a red flag, at that point, the ABG says you can have a documented interview for your verification. But if you feel like you need more information in a situation that’s really raising a red flag, you may want to require that there is a letter from someone that knows the family situation that could attest to whether or not this is a situation where the student is not welcome or safe at home, or is not living in a stable situation.

Audience: Okay. Thank you.

Dan Clock: And we only have time for one last question.

Audience: Okay. Mine asks about verification, files that are selected or people who are selected for verification require additional documentation. So those people may automatically flag information that we discover they’re not meeting the definition and are not homeless, so is it gonna be unusual to find students who are maybe considered homeless for one year, when they’re not selected for verification and don’t turn in additional documents, and then the next year, they are, and going back and forth? Is that gonna be an issue?

Dan Clock: Not that I’m aware of. Because you –

[Crosstalk]

Audience: So but it could occur.

Dan Clock: You can think of a lot of different scenarios unrelated to homeless youth where there’s substantial changes from year to year, especially in this kind of economy. So I don’t think that raises any red flags on our side.

Audience: Okay. What about the ones that we find out that are not homeless in that they live in a stable environment, where relatives or others have been raising them, claiming them on their income tax, but they do not have contact for whatever reason, with their parents?

Dan Clock: Well, again, there are at least four different scenarios in there, and we could extrapolate beyond that. You're gonna have to really look at these on a case-by-case basis. But, sure, you could have a situation where the student has indicated yes to one of the three homeless questions. There was no conflicting information. They weren't selected for verification in Year 1. In Year 2, it comes back they are selected for verification, or sometime during the year, you learn some new information and it changes their status. It would be no different from a lot of other things within the FAFSA. You just deal with it at the time you received the additional information and resolve the conflict, and then make the appropriate changes.

Audience: Our campus has a lot of students who don't live with their parents. They live with other people to the extent that they consider 'em their parents because they've claimed 'em on their tax returns and things like that. Then we could go in and look deeper to try and create – see if they fit under the scenario of a homeless –?

Dan Clock: Well, from your description, you've already described fraud with the IRS, but we won't go there. But it –

Audience: We correct 'em. We force them to get parent information or if they cannot, in the past, they've been going towards the dependency change to see if they fit that scenario. In a lot of case, they don't. But I didn't know if this would –

Dan Clock: No, it's not gonna cause any red flags that I'm aware of, and I'm pretty close to that situation.

Well, thank you very much. We hope this session was helpful, and we thank you for your participation. Hope you have a great day. Don't forget two things, seven to ten days after the conference has ended we will be posting all these sessions to IFAP. And please fill out – if this was helpful, please fill out your feedback forms. Thank you.