

POLICIES AND PROCEDURES

Academic Year 2022-23



THE CALIFORNIA FAFSA/CADAA CHALLENGE FOR STUDENTS EXPERIENCING HOMELESSNESS,

led by John Burton Advocates for Youth (JBAY) in partnership with SchoolHouse Connection and the California Department of Education (CDE), is a statewide campaign to increase the number of homeless students who are prepared for success as they matriculate from high school into college by ensuring that they are accessing financial aid.

GOAL OF THE CAMPAIGN: The goal for 2022-23 is that **at least 50 percent** of California's high school seniors experiencing homelessness complete the Free Application for Federal Student Aid (FAFSA) or California Dream Act Application (CADAA).¹

HOW THE CAMPAIGN WORKS: Local efforts are led by homeless education liaisons within County Offices of Education (COEs) or Local Education Agencies (LEAs) in collaboration with local partners, including community-based organizations, homeless services and housing providers, and colleges. JBAY and SchoolHouse Connection provide technical assistance, promotional materials, support for tracking FAFSA/CADAA completion, and other resources to participating homeless education liaisons to support them in this effort. COEs and LEAs "taking the challenge" will be recognized and celebrated throughout the campaign.

BACKGROUND: Every year, billions of dollars in federal financial aid go unused because eligible students do not complete the FAFSA. According to the California Student Aid Commission (CSAC), 57 percent of California's high school seniors in the class of 2022 completed the FAFSA or CADAA.

Historically, students experiencing homelessness have completed the FAFSA or CADAA at a rate much lower than that of other high school seniors. Research indicates that homeless youth face many barriers to accessing federal financial assistance while pursuing college. Burdensome program requirements, extensive documentation, and limited

academic preparation can impede access to aid for homeless youth. With education a key driver toward financial stability in adulthood, and receipt of financial aid crucial to enrolling and persisting in college for youth from low-income backgrounds, the FAFSA/CADAA Challenge aims to bring attention to the widespread disparities youth experiencing homelessness face and the critical importance that they have the same access to financial aid as their peers.

Successful completion of the FAFSA/CADAA is the single most important step in ensuring students experiencing homelessness receive financial aid and subsequently enroll and persist in college, including career and technical education programs provided by California's 115 community colleges. Data shows that 90 percent of high school seniors who complete the FAFSA enroll in college within 12 months, compared to just 45 percent of high school seniors who do not complete the FAFSA. A February 2017 report on community college students in California found that 47 percent of students with a zero-expected family contribution who received more than \$7,500 in financial aid graduated from college or transferred from a 2-year to 4-year institution, compared to 17 percent of those who only received between \$1,001 and \$2,500.



¹ Undocumented students are not eligible for federal financial aid but can access state aid by submitting a California Dream Act Application (CADAA).

PARTNERS: The California Department of Education is the lead state agency partnering with JBAY and SchoolHouse Connection on the California FAFSA/CADAA Challenge for Students Homelessness. Homeless education liaisons within County Offices of Education and Local Education Agencies (i.e., individual high schools and school districts) coordinate the local Challenge in partnership with community-based organizations and others who directly support high school seniors experiencing homelessness with completing the FAFSA or CADAA.

HOW TO REGISTER: Registration is only open to homeless education liaisons from COEs and LEAs, including individual high schools. Homeless education liaisons can join the Challenge by completing a short registration form that can be found [HERE](#). Partner organizations wanting to support the effort can use this same link to provide their contact information, and JBAY will connect them with their local COE or LEA contact.

The deadline to register is **November 11, 2022**, however, homeless education liaisons are encouraged to register as early as possible. Information requested in order to register includes:

- Name of the homeless education liaison who will be JBAY's primary contact as well as a secondary contact for the FAFSA/CADAA Challenge.
- Number of qualified high school seniors attending school in the county for the 2022-23 academic year (see the "Determining the Baseline" section for additional information on how to calculate this number).

PARTICIPATING COEs and LEAs RECEIVE:

- **Free promotional materials** to communicate the importance of filing the FAFSA or CADAA, highlight things to know when completing the form, and remind students of key deadlines.
- **Access to free printed copies of JBAY's new *Financial Aid Guide for California Homeless Youth* including a Spanish language version.** The number of copies made available will depend on the number of high school seniors reported. The Financial Aid Guide for Homeless Youth is available online at <https://jbay.org/resources/financial-aid-guide-for-ca-homeless-youth/>
- **Two chances to win up to \$1,000 in unrestricted program grant funds.** One round of winners will be selected in April 2023 and another round will be selected in June 2023.
- **Technical Support:**
 - Access to webinars on FAFSA/CADAA-related topics.
 - Phone and e-mail support for technical questions about the FAFSA/CADAA. In most cases, responses will be provided to questions within one business day.
 - One-on-one support via phone, e-mail, video

conference and in-person meetings with developing a local campaign and tracking FAFSA/CADAA completion.

DETERMINING THE BASELINE: Upon registration, each homeless education liaison will be asked to provide the number of current 12th grade homeless youth enrolled in their county, district, or school based on the information available in CALPADS or their Student Information System (SIS). Homeless education liaisons can determine this information using the following CALPADS reports:

- **CALPADS 1.18:** This is the Census Day point-in-time count for the current school year. Census Day is the first Wednesday in October. Typically, this data is not certified and posted until January.
- **CALPADS 8.1 Student Profile List, 5.4 Homeless Students Enrolled (Unduplicated), and 5.5. Homeless Student List:** These are end-of-year reports that can be utilized to identify students experiencing homelessness during the prior school year. Homeless education liaisons can use these reports to identify high school seniors experiencing homelessness based on those who were identified during their junior year. **These reports will not include any newly enrolled or identified McKinney-Vento students, so it is important that homeless education liaisons utilize a combination of CALPADS and SIS reports to determine the most accurate cumulative baseline.**

Since homeless education liaisons within COEs are currently unable to access student-level information in CALPADS, it is recommended that they work with their local districts to determine the best method to exchange data. A review of relevant statutory language pertaining to the sharing of data between LEAs, including local school districts and County Offices of Education, for the purposes of tracking and supporting FAFSA completion for students experiencing homelessness can be found in Appendix A.

All 12th graders experiencing homelessness should be included, regardless of credit count. While some 12th graders may not have enough credits to graduate, because it is administratively onerous for many COEs and LEAs to track this information on an ongoing basis, it is not practical for the Challenge to exclude these students from the count. Additional information regarding tracking students who enter or exit your county or are no longer experiencing homelessness during the school year is included later in this document.

Who's included in the number?

Students attending school in the following settings are included in the baseline:

- **traditional high schools**
- **non-public schools**
- **charter schools**
- **alternative education**
- **continuing education**
- **juvenile halls**
- **independent study**

Additionally, **non-diploma track and special education certificate of completion** students are also *included*.

DETERMINING FAFSA/CADAA COMPLETION: Homeless education liaisons can choose between two methods to determine FAFSA/CADAA completion using WebGrants, a database managed by CSAC. Both methods show which students have submitted a FAFSA or CADAA, which have not, which of these applications are complete, and which are incomplete. The information should then be matched to the cumulative list of high school seniors (see template [HERE](#)) within each county, district, or high school to determine the rate of FAFSA/CADAA completion overall. Note that all FAFSA/CADAA completions should be included regardless of whether the FAFSA/CADAA was completed before or after the homeless education liaison signed up for the Challenge.

Information regarding FAFSA/CADAA completion is typically updated in WebGrants 5-7 business days after submission of the application. If a student completes the California Dream Act Application, information is updated in real time. WebGrants reports are updated every weekend.

- **Method 1:** The first method to verify FAFSA/CADAA completion requires a log-in credential. In order to request a log-in credential, homeless education liaisons should first determine if their organization already has a WebGrants administrator. Those without an existing WebGrants administrator can contact JBAY for additional instructions or consult the WebGrants manual posted on the FAFSA/CADAA Challenge [webpage](#). Once a log-in credential has been obtained, homeless education liaisons can consult the WebGrants manual on the FAFSA/CADAA Challenge webpage or contact the JBAY support team for assistance with downloading the appropriate reports. The California Student Aid Commission also offers a user help line at schoolsupport@csac.ca.gov or (888) 294-0153 and provides webinars about how to use the WebGrants system [HERE](#).
- **Method 2:** The second method to verify FAFSA/CADAA completion does not require a log-in credential and instead utilizes a secure file transfer system that is connected but external to the WebGrants database. Homeless education liaisons can contact Pavani Maddikunta at pavani.maddikunta@csac.ca.gov to setup the secure file transfer system, which streamlines the verification process by enabling homeless education liaisons to upload a spreadsheet of their high school seniors and download a data-matched spreadsheet that indicates which students have submitted a FAFSA or CADAA. Additional instructions on using the secure file transfer system can be found on the FAFSA/CADAA Challenge [webpage](#).

WEBGRANTS VERIFICATION: It is required that homeless education liaisons utilize the WebGrants system as this will provide the most up-to-date and accurate information as well as be the easiest and most accessible method of tracking FAFSA/CADAA completion. If a homeless education liaison is unable to access WebGrants, please contact the JBAY team for additional guidance.

In the case of a student attending a non-accredited or non-public school whose information cannot be obtained through WebGrants, viewing the student's FAFSA or CADAA

submission confirmation or Student Aid Report (SAR) is allowable, but only in these limited circumstances.

STUDENT OUTREACH: Based on the information obtained from WebGrants regarding which students have and have not completed the FAFSA/CADAA, homeless education liaisons should coordinate with other local partners, such as high school counselors and community colleges, to ensure direct support is provided to students who have not yet completed the FAFSA or CADAA

During student outreach, it is also strongly encouraged that homeless education liaisons and partners assist students to ensure that their high school GPA has been uploaded to WebGrants by their high school, to submit a [Chafee Grant](#) application (if eligible) and to sign up for a [student WebGrants Account](#).

- **GPA Verification:** In order to qualify for a CalGrant, students must have a verified GPA submitted to CSAC. In most cases, this will be submitted electronically by their high school. It is important to verify that the information has been correctly submitted and matched to the student's FAFSA/CADAA. Consult the WebGrants User Manual for additional information.
- **Chafee Grant Application:** If the student was in foster care between 16 and 18 they may be eligible for \$5,000 a year for their post-secondary education.
- **Student WebGrants Account:** This tool helps students manage the financial aid process including managing their Cal Grant and/or Chafee accounts online. Students can create a WebGrants for Students account at mygrantinfo.csac.ca.gov.

DATA SUBMISSION DATES: Participating counties will submit periodic reports with FAFSA/CADAA completion rates to JBAY. Data will be submitted to JBAY two times:

REPORT DEADLINE	PERIOD
March 24, 2023	Cumulative report on those who submitted between October 1, 2022 and March 2, 2023 (FAFSA priority application deadline)
June 9, 2023	Cumulative report on those who submitted between October 1, 2022 and May 19, 2023 (end of the Challenge)

IMPORTANT REMINDERS: If a student shows up in WebGrants as "No EFC," meaning the student has submitted the FAFSA/CADAA but the application contains errors that do not allow the FAFSA/CADAA to be processed or the Expected Family Contribution (EFC) to be determined, the application will count toward the Challenge but JBAY strongly encourages homeless education liaisons to follow up with any student who is designated as "no EFC" to correct errors so these students can get financial aid.

IMPORTANT REMINDERS (cont.): Challenge participants are strongly encouraged to get as many students as possible to complete the FAFSA/CADAA by March 2nd to ensure access to the greatest amount of aid.

STEPS TO TRACKING ENTRIES AND EXITS OF HIGH SCHOOL SENIORS AND FAFSA/CADAA COMPLETION:

JBAY recognizes that homeless youth are a highly mobile population and that new students will enter your county, district, or high school during the course of the school year, and students who were included in the original baseline count may exit. Below are the steps that JBAY recommends that homeless education liaisons takes to track both entries and exits of high school seniors and FAFSA/CADAA completion.

We recommend using an internal spreadsheet to track both the total cumulative count for the year and to easily track which students require additional outreach. Because the CALPADS reports provide only a point-in-time snapshot, the protocol described below should be used to track entries and exits of students in order to provide accurate reports. A template of this spreadsheet is available at jbay.org/resources/homeless-youth-fafsa-challenge-policies-and-tools/

STEP 1

Compiling your list of students

Beginning **October 1, 2022**, homeless education liaisons should prepare a list of all high school seniors who are identified as attending school in their county, district, or school. All 12th graders should be included, regardless of credit count (see **“Determining the Baseline”** on pg. 2 for additional information).

While some 12th graders may not have enough credits to graduate, it is administratively onerous for many counties to track this information on an ongoing basis. Therefore, it is not practical for the Challenge to exclude these students from the count.

Note: *If a student is in a charter school that is incorporated in one county but physically located in a different county, the county of incorporation does not need to include that student in the count.*

STEP 2

Entering “student name” and “start” date”

Those who are included on the initial list should be given a “start date” that corresponds to the date that the list was pulled. **For a detailed example see FIGURE 1.2 in the tracking Visual Guide below.**

STEP 3

Verifying FAFSA/CADAA completion

As FAFSAs or CADAAAs are completed and verified through WebGrants, use the drop-down menu to indicate “YES” completion on the spreadsheet. **For a detailed example see FIGURE 1.3 in the tracking Visual Guide below.**

STEP 4

(Student exits from the county, district, or school)

As students exit the county, district, or high school or is no longer McKinney-Vento eligible, an exit date should be recorded on the spreadsheet. The spreadsheet will automatically populate the number of days the student resided in the county, district, or school and if they will be included in your Challenge *Total Homeless Youth Count*. **For a detailed example see FIGURE 1.4 in the tracking Visual Guide below.**

STEP 5

(Calculating TOTAL HOMELESS YOUTH count)

The internal tracking sheet will automatically populate individual students who are included in the *Total Homeless Youth Count*.

The sheet will also calculate the cumulative *Total Homeless Youth Count*. **For a detailed example see FIGURE 1.5 in the tracking visual guide below.**

The numbers reported to JBAY are a cumulative total of the number of students enrolled in school in your county for at least 30 cumulative days **on or after October 1, 2022**.

IMPORTANT NOTES & REMINDERS

For a detailed student examples, see the “student examples” on page 5 in the tracking visual guide below.

- All eligible students enrolled in your county, district, or school for at least 30 cumulative days **AFTER October 1st** must be included in your *Total Homeless Youth Count* for a given reporting period.
- If a student has been enrolled in your county, district, or school for **less than 30 days**, that student **should not** be included in the *Total Homeless Youth Count* **except** if the youth completed a FAFSA/CADAA while in your county, district, or school (see [student examples](#) on page 5 for a visual explanation).
- If a student left your county, district, or school **after** 30 cumulative days, the student is still included in your *Total Homeless Youth Count* even if they did not complete a FAFSA/CADAA while they were in your county, district, or school.
- If, however, a youth is enrolled in your county, district, or school for less than 30 days and you assist her or him with completing the FAFSA/CADAA while in your jurisdiction, that student may be added to the *Total Homeless Youth* and *Total FAFSA/CADAA Submissions* counts.
- Students who graduate prior to the end of the school year, who were enrolled in your county, district, or school for at least 30 days, should be included in your total. Homeless education liaisons are encouraged to work with school staff to ensure these students remain eligible for the Cal Grant and that their GPA is submitted to CSAC.

Internal Tracking Sheet Visual Guide

Below you will find a visual guide to complement the steps in the previous section. **For the purposes of this guide, the visual guide will begin at STEP 2.**

You can find the JBAY internal tracking sheet at <https://jbay.org/resources/homeless-youth-fafsa-challenge-policies-and-tools/>.

Please note: this sheet is for **internal** use only and you are not required to submit the spreadsheet during the FAFSA/CADAA Challenge reporting requirements. JBAY will only request the information highlighted in yellow.

STEP 2

Student First Name	Student Last Name	Start Date (no earlier than October 1, 2022)
Charlie	Reynolds	11/1/2022

FIGURE 1.2

Enter the **STUDENT NAME** and **START DATE**

STEP 3

Student First Name	Student Last Name	Start Date (no earlier than October 1, 2022)	FAFSA/CADAA completed (Yes/No)
Charlie	Reynolds	11/1/2022	Yes

FIGURE 1.3

Select "Yes or No" in the **Drop-Down Menu** indicating if a FAFSA/CADAA was Completed.

STEP 4

Student First Name	Student Last Name	Start Date (no earlier than October 1, 2022)	Exit Date	FAFSA/CADAA completed (Yes/No)
Charlie	Reynolds	11/1/2022	12/30/2022	Yes

FIGURE 1.4

Enter the student's **EXIT DATE** (if applicable)

The tracking sheet will **automatically populate** individual students who are included in the **Total Homeless Youth count**.

STEP 5

Exit Date	FAFSA/CADAA completed (Yes/No)	Include in count? (Yes/No)
12/30/2022	Yes	Yes
Total	1	1
FAFSA Completion Rate	100%	

FIGURE 1.5

The sheet **auto-calculates** the **cumulative Total Homeless Youth** count.

The numbers reported to JBAY should be a cumulative total of the number of students enrolled in school in your county,

district, or school for at least 30 cumulative days **on or after October 1, 2022**.

Student Examples

Buzz Lightyear: Buzz was under your jurisdiction for 29 days in October, however, he did not complete a FAFSA or CADAA. He is *not* included in the total count.

Bo Peep: Bo was under your jurisdiction on October 1 and left on November 14. She completed a FAFSA or CADAA and *is* counted towards the total count.

Lightning McQueen: Lightning was under your jurisdiction for more than 30 days and completed a FAFSA or CADAA. He *is* counted toward the total count.

Antonio Madrigal: Antonio was under your jurisdiction for 25 days; however, he completed a FAFSA or CADAA. He *is* counted towards the total count.

Prince Naveen: Prince was under your jurisdiction for 50 days; however, he didn't complete a FAFSA or CADAA. He *is* counted towards the total count.

Student First Name	Student Last Name	Start Date (no earlier than October 1, 2022)	Exit Date	FAFSA/CADAA completed (Yes/No)	Include in count? (Yes/No)
Buzz	Lightyear	10/1/2022	10/30/2022	No	No
Bo	Peep	10/1/2022	11/14/2022	Yes	Yes
Lightning	McQueen	11/1/2022	2/24/2023	Yes	Yes
Antonio	Madrigal	11/5/2022	11/30/2022	Yes	Yes
Prince	Naveen	11/28/2022	1/17/2023	No	Yes

FIGURE 1.6

SUBMITTING DATA: To qualify for the FAFSA/CADAA Challenge awards for counties, a report of FAFSA/CADAA completion rates must be submitted to JBAY via the online form(s) on or before the report deadlines listed on page 3. An online form will be sent out to counties two weeks prior to each deadline. The total number of seniors who completed their FAFSA/CADAA must be verified by WebGrants.

Reports should include:

1. Cumulative total number of homeless youth high school seniors who have attended school in the county during the reporting period for at least 30 cumulative days.
2. Cumulative total number of homeless youth high school seniors who have completed a FAFSA/CADAA, as verified in WebGrants and
3. FAFSA/CADAA percentage completion rate. (Cumulative total homeless youth seniors who completed a FAFSA or CADAA/Total homeless youth seniors)

The report will also ask you to provide information regarding the source(s) of data used to determine each number.

HOMELESS EDUCATION LIAISON AWARDS: Four participating organizations with the highest rates of FAFSA/CADAA completion among those of comparable size will be awarded unrestricted grants of up to \$1000 to promote homeless youth success in matriculating from high school to post- secondary education. JBAY will divide participating organizations up by size (very small, small, medium, and large) based on their number of high school seniors experiencing homelessness. The county, district, or school with the highest rate of FAFSA/CADAA completion in each category will receive the award. **Two sets of awards** will be given: one for the highest completion rates as of the March 2nd priority deadline and one set for the highest completion rates at the close of the campaign in May 2023. If more than one organization has the same highest rate, a winner will be selected at random from among those with the highest rates.

CELEBRATING SUCCESSES: Award recipients will be highlighted in JBAY communications and JBAY will provide press releases to local and statewide media to support additional recognition. Winners will be acknowledged publicly to the extent that opportunities are available to do so.

FOR MORE INFORMATION: Contact Sarah Pauter at sarah@jbay.org or (619) 792-2281.

SIGNIFICANT DATES

OCTOBER 2022

October 1, 2022: FAFSA/CADAA opens and the Challenge begins. Register to take the Challenge [HERE](#).

NOVEMBER 2022

November 11, 2022: Deadline to sign up for the challenge. Register [HERE](#).

MARCH 2023

March 2, 2023: Priority FAFSA/CADAA deadline.

By March 24, 2023: COEs and LEAs submit to JBAY the number of students who have completed the FAFSA or CADAA between **October 1, 2022** and **March 2, 2023**. Homeless education liaisons will be emailed a submission link at least two weeks prior to the report deadline.

APRIL 2023

By April 14, 2023: Round one award winners announced and notified.

MAY 2023

May 19, 2023: FAFSA/CADAA Challenge ends.

JUNE 2023

By June 9, 2023: Final round of data collected for the FAFSA/CADAA Challenge. COEs and LEAs submit to JBAY the cumulative number of students who have completed the FAFSA or CADAA between October 1, 2022 and May 19, 2023. Homeless education liaisons will be emailed a submission link beginning at least two weeks prior to the final report deadline.

By June 30, 2023: Final award announced and notified.

APPENDIX A: MEMORANDUM

FROM: John Burton Advocates for Youth
DATE: November 2, 2021
RE: Data sharing for implementation of the CA Homeless Youth FAFSA Challenge

This memo outlines certain statutory language that is relevant to the sharing of data between Local Education Agencies, in particular between local school districts and County Offices of Education, for the purposes of tracking and supporting completion of the Free Application for Federal Student Aid (FAFSA) for students experiencing homelessness. This memo is meant to summarize relevant information and should not be construed as a legal opinion.

Obligations to Students Experiencing Homelessness

The McKinney-Vento Homeless Assistance Act ([42 U.S.C. § 11431-11435](#)) is federal legislation that ensures the educational rights and protections of children and youth experiencing homelessness, including rights related to college preparation and access. Specifically, state McKinney-Vento plans must describe how homeless students “*will receive assistance from counselors to advise such youths, and prepare and improve the readiness of such youths for college.*” (42 U.S.C. § 11432(g)(1)(k)).

McKinney-Vento also requires that all LEA homeless liaisons ensure that “*unaccompanied youths are informed of their status as independent students under section 1087vv of title 20 and that the youths may obtain assistance from the local educational agency liaison to receive verification of such status for purposes of the Free Application for Federal Student Aid*”. (42 U.S.C. § 11432(g)(6)(A)(x)(III)). Finally, the law also provides that “*Local educational agency liaisons for homeless children and youths shall, as a part of their duties, coordinate and collaborate with State Coordinators and community and school personnel responsible for the provision of education and related services to homeless children and youths.*” (42 U.S.C. § 11432(g)(6)(C)).

Data Sharing

Education Code Sections [49073 - 49079.7](#) codify in State law certain requirements of the Family Educational Rights and Privacy Act (FERPA), including the circumstances under which records that contain personally identifiable student information may be shared without parental consent. Education Code Section 49076(a)(1)(C) permits access to records relevant to a legitimate educational interest by “*Authorized representatives of the Comptroller General of the United States, the United States Secretary of Education, and state and local educational authorities, or the United States Department of Education’s Office for Civil Rights, if the information is necessary to audit or evaluate a state or federally supported educational program, or in connection with the enforcement of, or compliance with, the federal legal requirements that relate to such a program.*”

Note that neither federal nor state statute makes a distinction between whether a school district or a county office of education is sharing data. California Education Code Section 60900 and the Family Educational and Right to Privacy Act (FERPA) (20 U.S.C.A, Sec. 1232g) respectively provide that a local educational agency shall *“include a county office of education, a school district and a charter school”* (Ed. Code Sec. 60900(j)) and that the term *“educational agency or institution means any public or private agency or institution which is the recipient of funds under any applicable program”* (FERPA Sec. 1232g).