High School Counselor FAFSA/CADAA Toolkit for Students Experiencing Homelessness

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Introduction

Historically, students experiencing homelessness have completed the Free Application for Federal Student Aid (FAFSA) or, in the case of undocumented homeless students, the California Dream Act Application (CADAA), at a rate much lower than that of other high school seniors. 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, it is vitally important that homeless students receive specialized support to ensure they have the same access to financial aid as their peers.

Successful completion of the FAFSA or 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. Data show that 90 percent of high school seniors who complete the FAFSA go on to enroll in college within 12 months compared to just 45 percent of seniors who do not.

Did You Know?

In 2024,



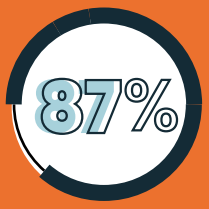
of people experiencing homelessness in the U.S. were children under 18.

High school students represent



of all homeless youth in California schools.

Homelessness is associated with an



greater likelihood of dropping out of school. At the same time, the highest risk factor for youth homelessness is the lack of a high school diploma or GED. Youth without those basic educational credentials are 4.5 times more likely to experience homelessness than their peers.

UNIQUE CHALLENGES HOMELESS STUDENTS FACE



Many homeless youth also experience homelessness with their families. A study of homeless and formerly homeless youth found that 47 percent of **youth experienced homelessness both with their family and on their own.**



While there are many factors leading to homelessness, youth often experience trauma and lack of family support, which can impact their emotional and educational development.



In addition to the lack of family support and awareness of resources, a Government Accountability Office (GAO) report found that homeless youth **face many barriers accessing federal financial assistance while trying to pursue college.** Burdensome program rules, extensive documentation, and limited academic preparation can impede access to aid for homeless youth.

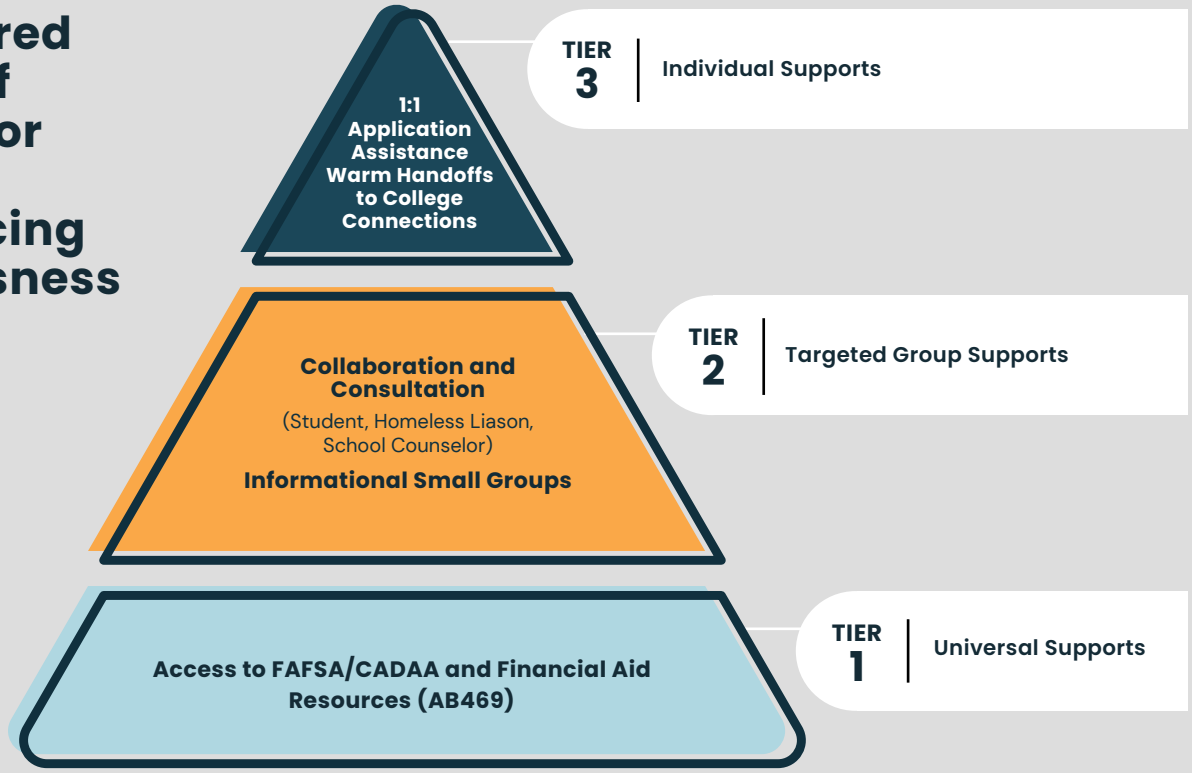
How Can You Help?

Counselors are a vital part of every student's school experience. As students begin to seek guidance on postsecondary opportunities and how to pay for college, it is imperative that school counselors provide them with information and support throughout the application process. Research indicates that high school juniors who met one-on-one with counselors were 6.8 times more likely to complete the FAFSA. Counselors can be particularly instrumental in identifying the needs of students who are homeless and ensuring they receive targeted college and career guidance, thus addressing the inequitable college outcomes that most homeless students experience.

Local education agencies are required to confirm that all 12th graders have completed financial aid applications unless they explicitly opted out or are otherwise exempt (Education Code Section 51225.7; AB 469). The Multi-Tiered System of Support (MTSS) Framework can provide helpful guidance in conceptualizing the individual level of support students experiencing homelessness need to successfully complete financial aid applications in light of this new requirement.

Multi-Tiered System of Support for Students Experiencing Homelessness

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TIER 1 — **ALL**

Per AB 469 (Education Code Section 51225.7), high schools are required to confirm FAFSA or CADAA completion for their high school seniors and direct them to appropriate resources and support. Most students will benefit from general information, workshops, and resources to assist with financial aid. However, given the unique challenges faced by youth experiencing homelessness, it is likely they fall under Tier 2 and Tier 3 and will need individualized and tailored application assistance to ensure that they can access financial aid.

TIER 2 — **SOME**

Many students experiencing homelessness do not receive adequate guidance around college and career planning. It is recommended that counselors collaborate and consult with the youth's team (e.g., homeless liaisons, case managers, etc.) to create an appropriate plan. It is best practice to assess the student's needs and develop an overall plan to reach their college and career goals. Additionally, informational small groups can be a helpful method to provide targeted resources and information to special student populations, such as students experiencing homelessness, if the student is comfortable with being identified as such while amongst their peers.

TIER 3 — **FEW**

For an even smaller group of students, including those experiencing homelessness, there is a need for high-touch, individualized assistance with completing their applications for financial aid. Some may not want to self-identify as a homeless youth in front of their peers in a workshop setting; others may need personalized assistance to ensure they qualify for independent student status on the FAFSA/CADAA. Submitting the FAFSA or CADAA, however, is just one step in the process. Students experiencing homelessness often require individualized assistance with other key steps in the college matriculation process such as applying to college and getting connected through a warm hand-off to campus-based support programs and resources such as basic needs centers, on-campus housing, and priority registration. Remember that due to the trauma many youth have experienced, there may be underlying fears, doubts, and worries about pursuing postsecondary education. Be persistent and consistent with encouraging and motivating youth about their potential to realize their dreams.

Who qualifies for independent student status on the FAFSA/ CADAA?

Homelessness, for the purposes of independent student status on the FAFSA/CADAA, is defined as someone that is unaccompanied AND homeless OR self-supporting and at risk of being homeless. Determining a student's status can sometimes be challenging as every student's situation is different and it is not always evident if a student meets the definition of homelessness. This tool can be used by counselors and other staff to determine if a student qualifies for independent status.

Unaccompanied

Not in the physical custody of a parent or guardian

+

Homeless

Lacking fixed, regular, and adequate housing

OR

Self-supporting AND at the risk of being homeless

When a student pays for his own living expenses, including fixed, regular, and adequate housing AND when a student's housing may cease to be fixed, regular, and adequate; for example, a student who is being evicted and has been unable to find fixed, regular, and adequate housing

NOTE: A student living in any of these situations and fleeing an abusive parent may be considered homeless even if the parent would provide support and a place to live.

DEFINITIONS

1. Homelessness:

lacking fixed, regular, and adequate housing including students who are:

- Staying with other people temporarily due to loss of housing, economic hardship, or a similar reason (i.e., "couch surfing")
- Living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations
- Living in emergency shelters
- Living in a car, sleeping outside, or staying someplace not normally meant for human habitation
- Living in substandard housing (e.g., inadequate sanitation, lack of water, lack of heating, unhealthy infestation of vermin or pests, fire and structural hazards, unsafe ventilation, and inadequate weather protection) or in housing that doesn't meet local building codes or the utilities are turned off

2. Unaccompanied Homeless Youth:

Youth under the age of 24 who are not in the physical custody of (i.e., living with) a parent or guardian and who lack a fixed, regular, and adequate nighttime residence. Unaccompanied homeless youth are considered independent students and do not need to include parental information on the FAFSA or CADAA.

EXAMPLES

Katherine was kicked out of her home before her senior year of high school. With nowhere else to go, she began sleeping in her car and would get to school early to use the showers and get ready for school. She remains one of the top students in her class and is involved with many extracurricular activities. Katherine would be considered an unaccompanied homeless youth.

Damien is a high school senior whose mother moved in with her boyfriend after being evicted from their home. Unfortunately, there wasn't room for Damien and he was left with nowhere to go. Damien called his pastor to ask for help. His pastor said that he had a spare bedroom and that Damien could stay with him so he could finish high school. Damien moved in and even though he doesn't think his pastor would kick him out, he knows his Pastor could choose to ask him to leave at any time. Damien would be considered an unaccompanied homeless youth.

Jane is a junior in high school. She does not have a strong relationship with her parents. Her parents have a history of drugs, and she and her younger brother have experienced abuse in the past. Jane's boyfriend's family has offered to take Jane and her brother in for the rest of the school year. Jane and her brother are considered unaccompanied homeless youth.

3. Unaccompanied Youth + Self-Supporting AND at risk of homelessness:

Youth under the age of 24 who are paying for their own living expenses, including housing, AND have housing which may cease to be fixed, regular, and adequate. If they are also unaccompanied (not in the physical custody of a parent or guardian) these students are considered independent students and do not need to include parental information on the FAFSA/CADAA.

EXAMPLES

Taylor is a senior and they recently came out to their parents as trans. Their parents kicked them out but they used the money they had saved to rent a room in town. While attending high school, working enough hours has been difficult and Taylor is unsure if they will make rent at the end of the month. They were late last month and their landlord let them know it could not happen again. Looking at their work schedule, it appears that Taylor will likely be facing the beginning of an eviction process at the end of the month. With this information, Taylor is at risk of homelessness and self-supporting and would be considered an independent student. They would not need to include parental information on their FAFSA/CADAA.

Aaron is a sophomore in college and is working full-time living paycheck to paycheck. He shares a one-bedroom apartment with a friend and contributes to the expenses, but his name is not on the lease. Aaron just found out that he's being let go from work in the next two weeks and without the job he will not be able to pay his friend. While he and his friend are buddies, he worries that at any time his friend can kick him out and he will not have a place to live. In this situation Aaron is at risk of homelessness and self-supporting and would be considered an independent student.

4. Accompanied Homeless Youth:

Youth under the age of 24 who lack a fixed, regular, and adequate nighttime residence and are in the physical custody of (i.e., living with) a parent or guardian. When filling out the FAFSA/CADAA, students who are homeless and living with a parent or guardian will fill out the FAFSA/CADAA as instructed. The student would <u>not</u> be considered an independent student and would need to include their parental information on the FAFSA/CADAA.

EXAMPLES

Bryan and his mother had to flee from their home after experiencing domestic violence. His mother called the local domestic violence shelter but there were no beds available. Thankfully, Bryan's aunt said they could sleep in her living room for a while until they figure out a permanent option. Bryan and his mother are staying temporarily with his aunt, but they could be asked to leave at any time. Bryan is an example of an accompanied homeless youth and therefore is not considered independent.

Jane is 16 and living with her immediate family and some extended family members in a crowded one-bedroom apartment. Most of the time there is no room to do homework and the apartment is filled with food, trash, and other items. Although it is crowded, Jane is thankful to share an air mattress with her cousins. These conditions would be considered substandard housing and Jane is an example of an accompanied homeless youth and therefore is not considered independent.

Ebony experienced a devastating fire which destroyed her home. After the fire, Ebony's family applied for FEMA assistance and were approved for temporary housing in a FEMA trailer while they worked to make repairs or rebuild their home. Ebony's FEMA trailer is considered emergency housing and she is considered an accompanied homeless youth, and therefore is not considered independent.

FAFSA/CADAA Screening Tool for Homeless and Foster Youth

The FAFSA/CADAA Screening Tool for Homeless and Foster Youth is a tool to help counselors and other school staff identify if students are experiencing homelessness or in foster care before they fill out the Free Application for Federal Student Aid (FAFSA) or California Dream Act Application (CADAA). Follow these steps and ask your students these questions to identify if they are independent students, meaning they do not need to include their parental information on the FAFSA/CADAA.

Before you begin this assessment, please review and state the mandated reporter confidentiality statement (e.g., "As we go through these questions, I want to give you a reminder that I'm a mandated reporter, which means I'm legally obligated to report any signs of abuse or neglect to appropriate authorities immediately.")

If you have questions about the criteria or process to report suspected child maltreatment, please consult with your local county **child abuse hotline**.

1 At any time since you turned 13, were both of your parents deceased, were you in foster care, or were you a dependent or ward of the court?

This means that you were removed from your home and placed in the care of a resource or foster parent, group home, residential treatment center, or relative caregiver through a court order.

IF YES You will qualify as an independent student. **MOVE TO QUESTION #3.**

Note for Counselors: On the FAFSA, a student will be asked to identify all the ways they might qualify for independent student status. Even if a student answers "yes" to the foster care questions, they will still be asked the question about experiencing homelessness. It is important a student answers "yes" to all the situations that apply to them, as this information may be used to identify students for additional resources and support, including financial aid.

IF NO MOVE TO QUESTION #2.

2 Does someone other than your parent or stepparent have legal guardianship of you, as determined by a court in your legal state of residence?

This means that you currently have a guardianship in place or did when you turned 18. It is important to note that the guardianship must have been granted through the court.

IF YES You will qualify as an independent student. MOVE TO QUESTION #3

Note for Counselors: Neither legal guardians nor foster parents (resource parents) are considered parents when completing the FAFSA. If the student is in a legal guardianship, they can qualify for independent status.

IF NO MOVE TO QUESTION #3

3 Do you live in any of the following situations?

- Staying with other people temporarily due to loss of housing, economic hardship, or a similar reason (i.e., "couch surfing")
- Staying in an emergency or transitional shelter
- Staying in a motel, campground, car, park, abandoned building, etc.
- Staying in substandard housing (e.g., inadequate sanitation, infestation of vermin or pests, lack of water/heating, etc.)
- Self-supporting and at risk of being homeless*

For more examples of homelessness, see here.

**"Self-supporting" is defined as a student who is paying for his or her own living expenses, including housing. "At risk of being homeless" is defined as when a student's housing may cease to be fixed, regular, and adequate. For example, a student who is being evicted and has been unable to find fixed, regular, and adequate housing.*

3 (continued)

IF NO **END QUESTIONS HERE.** The student does not meet the criteria for homelessness for the purposes of independent status on the FAFSA/CADAA financial aid applications.*

IF YES Move to question #4

Note for Counselors: In some cases, a student may have unusual circumstances that prevent them from contacting their parents or obtaining their information. This could be situations such as parental abandonment, abuse, neglect, legally granted asylum or student or parental incarceration. Students with these situations may complete the FAFSA as "provisionally independent" and their college will evaluate their unusual circumstances. Counselors should be careful to understand the student's circumstances and ensure that students do not meet the definition of homelessness before selecting this option.

4 Are you living with a parent or guardian?

IF YES You are considered an **accompanied youth.** You will fill out the FAFSA/CADAA as directed and answer "no" to the homeless questions on the FAFSA/CADAA. You will need to include parental information on the FAFSA/CADAA.* You should still reach out to the institutions you are interested in to see if there are resources, services, and scholarships for homeless youth. END QUESTIONS HERE.

IF NO You are considered an **unaccompanied youth.** You meet the McKinney-Vento definition of homelessness and should be connected to appropriate and available resources. You will qualify as an independent student. Move to question #5.

5 Do you know your McKinney-Vento liaison?

IF YES You should request a determination from the liaison verifying you are unaccompanied and homeless or unaccompanied, self-supporting, and at risk of homelessness. Keep a copy of the determination letter and submit it to your institution's financial aid office once they request it.

IF NO The counselor should identify the student as unaccompanied and homeless or unaccompanied, self-supporting, and at risk of homelessness and send a referral to the McKinney-Vento/homeless liaison. Explain McKinney-Vento program to the student, including the services and supports for which they are entitled. Connect the student with the McKinney-Vento liaison and ensure the student receives the homeless determination for the FAFSA/CADAA. A McKinney-Vento liaison can also designate other staff, such as counselors and case managers, to provide this determination. For more information on resources for homeless students or to identify the local homeless liaison, visit this page on the California Department of Education website.

High School Counselors Can Provide Homeless Determinations

Under the FAFSA Simplification Act, McKinney-Vento liaisons can designate staff such as counselors and case managers to issue a FAFSA determination for unaccompanied homeless youth or unaccompanied youth who are self-supporting and at risk of homelessness. Use this letter to provide determination and make sure you include the name of your school district liaison who designated you.

Timeline for Financial Aid and College Applications

The FAFSA and CADAA forms will be available on October 1st for the subsequent academic year. Students, particularly those attending four-year institutions, are encouraged to complete their applications before the March 2nd priority deadline to receive the maximum award possible, including institution-based aid and Cal Grant awards. However, students attending a California Community College can still submit a FAFSA or CADAA until September 2nd to be considered for the Cal Grant program.

After students complete their applications, be sure to assist them with acquiring and submitting a homeless determination letter (see Appendix A).

Table 1 outlines the application requirements and deadlines for postsecondary programs in California. While the UC and CSU applications are typically released on August 1st and October 1st, respectively, it is recommended that you work with the student to determine the exact application timeline for their specific program of interest.

Table 1 | Application Requirements and Deadlines for Postsecondary Programs

Post Secondary Programs	California State University System	University of California System	California Community College System	Adult Education Career Technical Programs	Apprentice Programs	Job Corps (i.e., career residential program)
Eligibility Requirements	• 2.0+ GPA • A-G Courses	• 3.0 + GPA • A-G Courses	No Minimum GPA: High School Diploma or equivalent recommended	No Minimum GPA: High School Diploma required or equivalent	No Minimum GPA: High School Diploma or equivalent required for most programs	No Minimum GPA
Application Type	Application	Application and essay	Application	Application	• Application • Entrance exam may be required	Application Interest Form
Application Fee Waiver	Up to 4 CSU Campuses	Up to 4 UC Campuses	N/A (free application)	N/A (free application)	N/A (free application)	N/A (free application)
Application Deadline	Typically November 30th for priority applications.	Typically November 30th	Open application, but applying by Spring of senior year is encouraged.	Check local programs for application timeline	Varies by program	Varies by program
Website	calstate.edu/apply	universityofcalifornia.edu/	cccapply.org/	https://caladulted.org/FindASchool	dir.ca.gov/databases/das/aigstart.asp	jobcorps.gov/

Homeless Youth FAFSA/ CADAA Tip Sheet for High School Counselors:

You can help homeless youth succeed in college!

Filling out the FAFSA or CADAA is just the first step in securing the best financial aid package. This checklist outlines the other crucial steps to ensure that students experiencing homelessness receive and maximize their financial aid. Remember, individualized assistance is the most effective. Keep in mind these considerations:

Timing YOUR SUPPORT:

FAFSA/CA Dream Act Application	**15-45 minutes**
Claiming CalKIDS college savings account	**5 minutes.**
Creating a WebGrants Account	**10 minutes**
Verifying GPA has been submitted and received	**5 minutes**

(if the GPA has not been successfully matched to their FAFSA/CADAA, additional time may be needed for troubleshooting)

VISIT
https://jbay.org/resources/financial-aid-guide/
for a comprehensive list of resources, tools and trainings to help students in foster care and students experiencing homelessness navigate financial aid

Before THE FAFSA / CADAA

- [ ] Ensure that FAFSA/CADAA workshop materials are inclusive of homeless youth.
- [ ] Ask students if they have access to their social security number. If not, help the student, request a social security number, ensuring they have the proper documents to get a social security card.
- [ ] Students may need to show a driver's license, state ID, birth certificate, or Social Security card before receiving aid. Help them apply now so they're ready.
- [ ] Make sure students have a personal email address to enter on the application (not a school-based email since they may lose access after graduation).
- [ ] For students that express that they do not want to fill out a FAFSA/CADAA, ensure they are aware of the benefits of financial aid and postsecondary education pathways and that completing an application does not commit them to going to college.
- [ ] If completing the FAFSA online, apply for an FSA-ID online at studentaid.gov/fsa-id/create-account before starting the FAFSA application. Be mindful that the "challenge questions," which are asked in order to verify their FSA ID username and password later if necessary, may relate to relatives and past residences, and therefore might be a trauma trigger for the student.
- [ ] Assist students with creating a system to store their passwords and usernames in a safe location.

During THE FAFSA / CADAA

- [ ] Unaccompanied youth who are homeless or self-supporting and at risk of homelessness may qualify as an independent student on their FAFSA/CADAA. Students who answer "yes" to this question do not need to report information about their parents or caregivers. Ensure that eligible students qualify for independent status. Youth who are experiencing homelessness with their family are dependent on the FAFSA/CADAA and will need to include information about their parents or caregivers.
- [ ] Students are asked if they received any federal benefits. Responding yes to this question exempts the student from having to report their current cash, savings, or checking accounts. Keep in mind that the names of these federal programs may be different in California: Medicaid = MediCal SNAP = Cal Fresh TANF = CalWorks

After THE FAFSA / CADAA

- [ ] Assist Students to check for CalKIDS eligibility and claim their scholarship at calkids.org. CalKIDS is a scholarship program available to students who were identified as low-income, in foster care, or experiencing homelessness while enrolled in a California K-12 school.
- [ ] Create a WebGrants 4 Students Account at mygrantinfo.csac.ca.gov. It can take one to three weeks for the FAFSA to be processed before an account can be created.
- [ ] Verify that their high school GPA has been submitted by their school to the California Student Aid Commission and matched to their account to ensure Cal Grant eligibility and receipt. Students experiencing homelessness are more likely to change high schools, which can result in a failure in the GPA matching process.
- [ ] Remind students to update their accounts if their email/address/ phone number changes (e.g., WebGrants, FAFSA, college portal, etc.).
- [ ] If verification of homeless status is required for financial aid or other campus-based resources, ensure that the student receives a homeless determination (see Appendix A).
- [ ] Encourage students to apply for scholarships, reach out to institution's financial aid offices, and explore programs/resources available for students experiencing homelessness.

Frequently Asked Questions:

HIGH SCHOOL COUNSELOR EDITION

1.	**What changes have been made to the FAFSA that impact youth experiencing homelessness?**	The FAFSA Simplification Act made changes to the FAFSA for students who are homeless or in foster care. The biggest change is that homeless and foster care status does not need to be redetermined every year. Any student who was determined to be homeless or a foster youth and was an independent student will be presumed to maintain their independent status for the subsequent year. This streamlines the process for FAFSA renewals; previously, youth were required to provide documentation every year they applied for aid. Additionally, the list of individuals who can determine homeless status has broadened to include a school district homeless liaison or their designee as well as the director or designee of an emergency or transitional shelter, street outreach program, homeless youth drop-in center, or other program serving individuals who are experiencing homelessness (not just HUD or RHYA funded) and director or designee of a program funded under a TRIO or Gaining Early Awareness and Readiness for an Undergraduate Program (GEAR UP) grant.
2.	**Can homeless youth who are not unaccompanied qualify for independent student status on the FAFSA/CADAA?**	No. Youth who are homeless but not unaccompanied, meaning they are with their parents, are not independent students. They will fill out the FAFSA/CADAA as instructed and include parental information.
3.	**Who can determine a students' homeless status for purposes of financial aid eligibility?**	The following entities are authorized to verify students' homeless status for financial aid: • High school or school district homeless liaisons or their designees • Director or designee of an emergency or transitional shelter, street outreach program, homeless youth drop-in center, or other program serving individuals who are experiencing homelessness • Director or designee of a program funded under a TRIO or Gaining Early Awareness and Readiness for an Undergraduate Program (GEAR UP) grant • A financial aid administrator at the student's current institution or at another institution who previously made the determination These individuals can utilize the determination letter template (Appendix A) to create homeless verification letters for students.
4.	**How can a high school counselor get designated by the liaison to provide determinations?**	McKinney-Vento liaisons can designate high school counselors or other high school to provide FAFSA determinations using the determination letter template (Appendix A). There is a space for the liaison to include their name and contact information in addition to the counselor's name. If none of these authorized individuals can confirm the student's homeless status, a financial aid administrator at the student's college must make a determination based on a written statement or a documented interview with the student.

5.	**What resources and supports are available to students experiencing homelessness once they've matriculated to college?**	Students experiencing homelessness are eligible for a variety of on-campus resources and supports based on either income or homeless status. These resources can vary from campus to campus so it is important to provide students with a "warm handoff" to appropriate advisors and support programs. On-campus programs and supports include: • **Priority registration**: Per California law, students who are verified as homeless within the past two years are eligible for priority registration. • **Priority for on-campus housing**: Per California law, students who are verified as homeless must receive priority access to housing at California State University (CSU) campuses. University of California (UC) campuses are requested, but not required to provide priority housing. These institutions are also required to provide housing, if open, during academic breaks at no additional cost. Ed Code §§ 76010, 90001.5. & 92660) • **Basic needs centers**: Many colleges have Basic Needs Centers to assist with housing, food, and linkages to other on-campus resources such as mental health services and child care. • **Homeless liaisons**: Every California Community College has a Homeless Youth Liaison who supports students with applying for and receiving financial aid. They also assist students with enrollment and connections to other services available on campus or in the community. California State Universities and University of California campuses may also have a designated liaison. It is recommended that high school counselors support students experiencing homelessness with identifying and contacting the homeless liaison at the campus in which they plan to enroll. • **Educational Opportunity Program (EOP)/Extended Opportunity Programs and Services (EOPS)**: EOP and EOPS provide specialized support to low-income, first generation college students including academic support services and financial assistance. • **California College Promise Grant (CCPG)**: Verified homeless youth are eligible for the (CCPG), , which provides an enrollment fee waiver. Students can apply by submitting a FAFSA or CADAA, or by applying here. • **Foster Youth Support Programs**: Every public college/university in California has a program to support current and former foster youth on campus with an array of services including academic counseling, tutoring, case management, book grants and emergency grants. Names, eligibility and services vary. To find the foster youth support program on the student's campus visit cacollegepathways.org/search-foster-youth-programs/.
6.	**What address should a student experiencing homelessness use for their FAFSA/CADDA?**	Students experiencing homelessness do not have to provide a home address, but they do need to provide a mailing address where they can reliably receive mail. This can be, for example, the address of a relative, friend, or social service agency that has given the applicant permission to use that address. It also can be the student's institution's address, if they have contacted the institution for permission and instructions are in place to ensure that mail they receive at the institution reaches them. Students should update their address on the FAFSA/CADAA once they have more stable housing.
7.	**What do I do if the financial aid office does not accept the student's letter or asks for additional information?**	Financial aid administrators must accept the homeless determination. According to an electronic announcement from the Department of Education, if the student has received a documented determination from one of these authorities, the institution must not request additional documentation, proof, or statements unless it has conflicting information about the student's status. Financial aid administrators must not request documentation or confirm answers to the homeless youth questions unless they have conflicting information. The AVG also states that "It is not conflicting information if you disagree with an authority's determination that a student is homeless." Share this information with the financial aid office.

8.	**Can I continue to write a determination letter for students after their senior year?**	Yes, you can continue to provide determination for students after their senior year if you believe you have the necessary information to do so. However, due to the new FAFSA provisions, once an unaccompanied homeless youth is determined to be independent, they should be presumed to be independent for subsequent years and will not need to provide additional documentation.
9.	**What information is required in a homeless determination?**	The homeless determination needs to state that the student meets the definition of an unaccompanied homeless youth or unaccompanied youth who is at risk of homelessness and self-supporting. The determination must also include the letter writer's contact information and role as an authorized entity to make this determination. The determination does not need to go into the reasons why a student is experiencing homelessness. A homeless determination letter template is available in Appendix A.
10.	**How do counselors identify homeless students on their caseload?**	High school counselors can utilize their Student Information System (SIS) to identify students who are experiencing homelessness. They can also access the 1.18 FRPM, 8.1 Student Profile, 5.5 Homeless Student, and 5.4 Homeless Students Enrolled reports in CALPADS, though the SIS may have more up-to-date information.
11.	**If a new student arrives at or leaves my school, what do I need to know to ensure that they qualify for financial aid?**	The student's name on WebGrants and the FAFSA/CADAA must match their Social Security card and the school's official student record. Below is guidance, depending on the nature of the error: **Mismatched Names** Errors on FAFSA/CADAA – Assist student with correcting their name and resubmitting the FAFSA/CADAA application. **Errors on WebGrants** – If the correction is minor (such as a dash or space removed/ added), a counselor can call California Student Aid Commission (CSAC) directly at (888) 294-0153. If the correction is more significant, the student must complete the CSAC form G-10 (located under "student forms" at csac.ca.gov). The student is required to provide two forms of ID. NOTE: CSAC will need to verify the student's name on a school record. If the student's name does not match the official student record, the student must correct the school record name first and then submit the G-10 form. **Mismatched Addresses** If the youth has recently moved, assist them to update their address in their WebGrants for Students account or call CSAC directly at (888) 224-7268. Additionally, assist the youth to update their address in their FAFSA or CADAA. If the youth's address does not match the GPA submitted by the school and the address on file in WebGrants, this will result in a non-match and they will not be awarded a Cal Grant until the information is corrected. Need assistance or have questions? Contact CSAC Institutional Support at (888) 294-0153/ schoolsupport@csac.ca.gov

12.	**What if I'm not sure if the student completed their FAFSA/CADAA?**	There are multiple options: 1) Assist the student to log into their FAFSA to verify that their FAFSA has been successfully completed and processed. 2) Verify completion via WebGrants. If you do not have access to WebGrants you can reach out to your school's WebGrants Administrator or your district's WebGrants Administrator. 3) Verify the student in the WebGrants Administrator account within the "Student Summary" report. Each district has their own account. 4) Encourage the student to create and sign into their WebGrants for Students account to check on the status of their application. A WebGrants for Students account can be created at mygrantinfo.csac.ca.gov. Note that it can take two to three weeks from the submission of the FAFSA or CADAA for the application to be processed and reflected in WebGrants.
13.	**Who can sign the "Opt-Out Form" on behalf of unaccompanied homeless youth as detailed in AB 469 and AB 2165?**	AB 469 requires LEAs to document 12th graders who elect not to submit, or are determined exempt from submitting, a FAFSA or CADAA. AB 2165 requires that LEAs, before exempting a student from completing the FAFSA or CADAA, facilitate a meeting between the school counselor and the student or the student's parent or guardian to discuss the purpose and benefits of submitting a FAFSA or CADAA and the consequences of not completing these financial aid applications. If an LEA determines a student is exempt, they shall complete and submit an opt-out form and notify the student's parent or guardian. Finally, AB 2165 requires LEAS to report on the number of opt-out forms submitted, including those submitted on behalf of a student and those submitted by the student's parent or guardian.
14.	**Can students apply for financial aid if their parents are not citizens?**	If the student is a citizen or an eligible non-citizen, they can submit a FAFSA regardless of the citizenship status of their parent or spouse. Students without legal status may submit a CADAA instead to apply for state and institutional financial aid. If students in mixed-status families have concerns about submitting a FAFSA, they may choose to submit a CADAA instead, even if they would otherwise be eligible for the FAFSA. Students who submit a CADAA instead of the FAFSA are only eligible for state and institutional financial aid and are not eligible for federal aid such as the Pell Grant, federal student loans, or federal work study.

Independent Student Status of Unaccompanied Homeless Youth Determination for the 2027-2028 FAFSA[1]

Student Information

Student's Name:	Student ID:
Student's SSN [optional]:	Student's DOB:

Determination

This form conveys my determination that at any point in 2026 or after, this student was:

☐ an unaccompanied homeless youth, as defined by the FAFSA Simplification Act (Public Law No: 116-260).

☐ an unaccompanied, self-supporting youth at risk of homelessness.

Under the FAFSA Simplification Act (Public Law No: 116-260), I am authorized to document this student's living situation and determine his/her independent student status as an unaccompanied homeless youth, or an unaccompanied, self-supporting youth at risk of homelessness. Financial aid administrators must accept this documentation, unless there is specific documented conflicting information. Please address any questions to me at the number or e-mail address listed below.

Contact Information

Signature:	Date:
Print Name:	Phone:
Email:	Title:
Agency:	

Role (check one):

☐ School district homeless liaison, or designee of the liaison.

- ☐ If you are the designee of the liaison, please list the name of your school district liaison here:

  _____

☐ Director or a designee of a director of an emergency or transitional shelter, street outreach program, homeless youth drop-in center, or other program serving individuals who are experiencing homelessness.

☐ Director or a designee of a director of a program funded under TRIO or GEAR UP.

☐ A financial aid administrator at the same or another institution who previously made a determination.

[1] This form is applicable for institutions that are requesting documentation from students who are enrolling in college for the 2027-28 award year who were not previously determined to be an unaccompanied homeless youth, or an unaccompanied youth who is self-supporting and at risk of homelessness. Students who were determined to be unaccompanied homeless youth, or an unaccompanied youth who is self-supporting and at risk of homelessness, in the prior award year are presumed to be independent for each subsequent year at the same institution, unless the student informs the institution that circumstances have changed, or the institution has specific conflicting information about the student's independence, and has informed the student of this information.

Pertinent Definitions

From the FAFSA Simplification Act (Public Law No: 116-260) and the 2026-27 Application and Verification Guide.

Homeless

A student is considered homeless if the student lacks fixed, regular, and adequate housing. This is broader than just living "on the street." It includes temporarily living with other people because the student had nowhere else to go; living in substandard housing (if it doesn't meet local building codes or the utilities are turned off, it is generally not adequate); living in emergency or transitional shelters, for example, trailers provided by the Federal Emergency Management Agency (FEMA) after disasters; or living in motels, camping grounds, cars, parks, abandoned buildings, bus or train stations, or any public or private place not designed for humans to live in. It also includes living in the school dormitory if the student would otherwise be homeless. A student living in any of these situations and fleeing an abusive parent may be considered homeless even if the parent would provide support and a place to live. For more information on the definition of homelessness, see "Does My Living Situation Meet the Definition of Homelessness?"

Unaccompanied

When a student is not living in the physical custody of a parent or legal guardian.

Youth

Any student who is not yet 24 may qualify for a homeless youth determination.

Self-Supporting

When a student pays for his own living expenses, including a fixed, regular, and adequate housing..

At risk of being homeless

When a student's housing may cease to be fixed, regular, and adequate; for example, a student who is being evicted and has been unable to find fixed, regular, and adequate housing.