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Office of P-12

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**NYS FIELD MEMO**  
**ESSA McKinney-Vento**  
**#03-2018**

**TO:** District Superintendents  
Superintendents of Public Schools  
Charter School LEA Administrators  
McKinney-Vento Liaisons

**FROM:** Ira Schwartz, Associate Commissioner Office of Accountability 

**SUBJECT:** College Counseling and Access for Youth Experiencing Homelessness

**DATE:** April 25, 2018

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This Field Memo provides important information and resources for local educational agencies (LEAs) regarding their obligations to support students in temporary housing better access higher education as a result of recent changes to the federal McKinney-Vento Act.

A college degree is more important than ever in securing employment and can be critical to a youth escaping poverty and homelessness. Indeed, while the number of jobs held by persons with some post-secondary education has increased by 11.5 million since the end of the recession, the growth in employment for students with only a high school diploma has been less than 100,000. Today, 65% of those who are employed have some post-secondary education.<sup>1</sup> Moreover, young college graduates earn about \$17,500 more annually than young adults who only have a high school diploma.<sup>2</sup>

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<sup>1</sup> Georgetown University Center on Education and the Workforce, *America's Divided Recovery: College Haves and Have-Nots*, 2016, available at: <https://cew.georgetown.edu/cew-reports/americas-divided-recovery/#full-report>.

<sup>2</sup> Pew Research Center, *The Rising Cost of Not Going to College*, February, 2014, available at: <http://www.pewsocialtrends.org/2014/02/11/the-rising-cost-of-not-going-to-college/>. See also S. Baum, C. Kurose, M. McPherson, "An Overview of American Higher Education," *The Future of Children*, Spring 2013, ([https://futureofchildren.princeton.edu/sites/futureofchildren/files/media/postsecondary\\_education\\_in\\_the\\_united\\_states\\_23\\_01\\_fulljournal.pdf](https://futureofchildren.princeton.edu/sites/futureofchildren/files/media/postsecondary_education_in_the_united_states_23_01_fulljournal.pdf)) (median weekly earnings of four-year college graduates were 83 percent higher than high school graduates in 2010, up from 41 percent higher in 1980).

However, youth who are homeless often experience barriers in their path to higher education related to the application process, financial aid, making the transition to college, and making it through college. The new provisions to the McKinney-Vento Act that went into effect as a result of the Every Student Succeeds Act of 2015 require that LEAs “prepare and improve the readiness of such youths for college.”<sup>3</sup> This Field Memo describes how LEAs can implement this requirement and related federal and State requirements, including:

1. Ensuring that youth experiencing homelessness receive individualized college counseling;
2. Ensure that all unaccompanied youth who are homeless receive verification of their independent student status for the purposes of federal and state financial aid; and
3. Ensuring that LEA personnel working with students in temporary housing are trained.

These requirements as well as strategies to implement them are detailed below.

### **1. Ensure youth experiencing homelessness receive individualized college counseling.**

The U.S. Department Education stated in its recent guidance that, “[t]he local liaison, along with guidance counselors and other LEA staff tasked with college preparation, should ensure that all homeless high school students receive information and *individualized counseling* regarding college readiness, college selection, the application process, financial aid, and the availability of on-campus supports.”<sup>4</sup> To do this, the McKinney-Vento liaison should identify the students in temporary housing in the 11<sup>th</sup> and 12<sup>th</sup> grades using the LEA’s student management system. This list should be provided to guidance and college counselors, and they must be tasked with meeting individually with these students to provide them with timely information, guidance, and support regarding post-secondary options and how to access them.<sup>5</sup> The New York State Education Department’s technical assistance center, NYS-TEACHS, has compiled a College Access Checklist that can be used by McKinney-Vento liaisons, guidance counselors, and other school district personnel to help them provide information on the college application process, college access programs, fee waivers for tests and college applications, financial aid, and scholarship opportunities among other resources. The College Access Checklist can be found here: <http://nysteachs.org/media/CollegeAccessChecklist.pdf>.

Additionally, under the McKinney-Vento Act, liaisons must ensure that parents experiencing homelessness are informed of educational and related opportunities available to their children.<sup>6</sup> Therefore, liaisons must ensure that such parents are aware of and encouraged to participate in college counseling opportunities for their children.

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<sup>3</sup> 42 U.S.C. § 11432(g)(1)(K).

<sup>4</sup> U.S. Department of Education’s Education for Homeless Children and Youths Program Non-Regulatory Guidance (“McKinney-Vento Guidance”), Question Q-1, available here: <https://www2.ed.gov/policy/elsec/leg/essa/160240ehcyguidance072716updated0317.pdf>; see also 42 U.S.C. § 11432(g)(1)(K).

<sup>5</sup> McKinney-Vento Guidance, Question Q-1.

<sup>6</sup> 42 U.S.C. § 11432(g)(6)(A)(v).

## 2. Ensure that all unaccompanied youth who are homeless receive verification of their independent student status for the purposes of federal and state financial aid.

Unaccompanied homeless youths<sup>7</sup> are considered independent students for purposes of federal financial aid. McKinney-Vento liaisons must:

- inform unaccompanied homeless youth of their eligibility to apply for financial aid as independent students and
- provide them verification of their independent student status.<sup>8</sup>

A template verification letter can be found here: [https://www.schoolhouseconnection.org/wp-content/uploads/2016/12/SHC\\_FAFSA\\_Determination\\_2017\\_FINAL.doc](https://www.schoolhouseconnection.org/wp-content/uploads/2016/12/SHC_FAFSA_Determination_2017_FINAL.doc). A liaison can also provide verification for an unaccompanied homeless youth in later years when the youth is no longer enrolled in the LEA if the liaison has the necessary information to make such a determination for the youth.<sup>9</sup>

If an unaccompanied homeless youth applies for a New York State Tuition Assistance Program (TAP) award as an independent student, the sample verification letter for FAFSA mentioned above is not sufficient; the student must submit a statement from someone such as the McKinney-Vento liaison, a social worker, legal aid representative, caseworker, or member of the clergy showing that there has been an involuntary dissolution of a student's family resulting in relinquishment of parents' responsibility (see <https://www.hesc.ny.gov/pay-for-college/financial-aid/types-of-financial-aid/grants/tap-faqs.html>). There is no template for such a statement, because the statement must address the unique circumstances of the youth's life.

When providing information to unaccompanied homeless youth about their independent student status, liaisons and counselors should also share that the maximum TAP award for independent students with no dependents is significantly less than the maximum award for dependent students.<sup>10</sup> Liaisons should explore with unaccompanied homeless youth ***if they can safely get*** their parents' financial information and signature. If they can, it may be financially beneficial for the unaccompanied homeless youth to apply as a dependent student for purposes of TAP, even though they may qualify as an independent student.

## 3. Training LEA personnel working with students in temporary housing.

McKinney-Vento liaisons are required to ensure that LEA staff working with students who are homeless receive professional development.<sup>11</sup> To carry out this requirement and the requirement

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<sup>7</sup> Unaccompanied homeless youth are youth who are not in the physical custody of a parent or legal guardian and are living in a homeless situation (42 U.S.C. § 11434A[6]). Any unaccompanied homeless youth enrolled or eligible to enroll in an LEA is protected under McKinney-Vento, including youth 18-21-years old who haven't graduated from high school.

<sup>8</sup> 20 U.S.C. § 1087vv(d)(1)(H) & 42 U.S.C § 11432(g)(6)(A)(x)(III).

<sup>9</sup> McKinney-Vento Guidance, Question Q-2.

<sup>10</sup> The maximum annual TAP award for an independent student is approximately \$2,000 less than the maximum award for a dependent student. For more information, see: <https://www.hesc.ny.gov/pay-for-college/financial-aid/types-of-financial-aid/grants/estimate-your-tap-award.html>.

<sup>11</sup> 42 U.S.C. § 11432(g)(6)(A)(ix).

that LEAs ensure that students who are homeless receive college counseling,<sup>12</sup> *LEAs must ensure that guidance and college counselors receive training to ensure that students experiencing homelessness are appropriately informed and supported in their path to higher education.* There are several resources available to assist liaisons in providing this professional development, including resources from:

- **NYS-TEACHS:**
  - College Access Checklist: <http://nysteachs.org/media/CollegeAccessChecklist.pdf>
  - PowerPoint Presentation that can be downloaded and customized: <http://nysteachs.org/materials/training-materials.html>
  - Recorded webinars: <http://nysteachs.org/trainings/WebinarMaterials.html>
  - Higher education webpage: <http://nysteachs.org/info-topic/access-college.html>
  
- **SchoolHouse Connection:**
  - Scholarship Program: <https://www.schoolhouseconnection.org/youth-leadership/scholarship-program/>
  - Independent student verification letter: <https://www.schoolhouseconnection.org/sample-form-letter-to-determine-the-independent-student-status-of-unaccompanied-homeless-youth/>
  - Higher education webpage: <https://www.schoolhouseconnection.org/learn/higher-education/>
  - Recorded webinars: <https://www.schoolhouseconnection.org/learn/webinars/archived-webinars/>
  
- **National Center for Homeless Education (NCHE):**
  - Higher education webpage: [https://nche.ed.gov/ibt/higher\\_ed.php](https://nche.ed.gov/ibt/higher_ed.php)
  - Recorded webinars: [https://nche.ed.gov/web/s\\_p.php](https://nche.ed.gov/web/s_p.php)

If you have questions or would like additional information, please contact Melanie Faby, State Coordinator for Homeless Education, (518) 473-0295, [melanie.faby@nysed.gov](mailto:melanie.faby@nysed.gov); New York State Technical and Education Assistance Center for Homeless Students (NYS-TEACHS) at (800) 388-2014; or the Higher Education Services Corporation (<https://www.hesc.ny.gov/>).

cc: Jason Harmon  
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<sup>12</sup> 42 U.S.C. § 11432(g)(1)(K).