Jumping Through the Hoops to Get Financial Aid for College Students Who Are Homeless: Policy Analysis of the College Cost Reduction and Access Act of 2007

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Congress enacted the College Cost Reduction and Access Act (CCRAA) to improve college access for unaccompanied homeless youth by expanding the definition of "independent student" on their financial aid applications. Using qualitative interviews with homeless community college students and university financial aid administrators (FAA), this research explored the implementation of this policy. This study indicates that multiple barriers to financial aid for homeless youth continue to persist after the passage of CCRAA. Youth reported burdensome verification procedures and FAAs reported extensive justification to prove youth homelessness and attempts to support students. Efforts to increase these youths' ability to receive financial aid include revisions to the verification procedures and specialized trainings. Specific recommendations for practice, policy, and research are provided.

IMPLICATIONS FOR PRACTICE

- More extensive training is necessary for all professionals who work with youth who are homeless and should include information on the nuances of youth homelessness and federal financial aid policies.

- Federal financial aid policies for youth who are homeless should be revised to remove barriers to college.

In 2007, Congress enacted the College Cost Reduction and Access Act (CCRAA) to improve college access for unaccompanied homeless youth by designating the population termed "independent students" by definition and encouraging federally-funded college access programs to serve these students. To effectively serve this population, social workers and other human service professionals must understand this legislation and ensure that these youth receive the resources that are available to them.

To date, research on homeless youth in higher education is very limited (U.S. Department of Housing and Urban Development Exchange, 2015). There is some research that speaks to the precollege experience of homeless youth (Buckner, Bassuk, & Weinreb, 2001; Dworsky, 2008; Hallett, 2010; Tierney, Gupton, & Hallett, 2008); however, very little research addresses the experience of these youth once they get beyond admission into colleges and universities. In terms of the CCRAA, the authors located only a few studies that addressed the benefits, barriers, and challenges of enacting this law (Cochrane & Szabo-Kubitz, 2009).

To contribute to the knowledge base, the intent of this study is two-fold: (a) to examine youth's experiences in applying for and receiving federal and/or state aid in higher education and (b) to assess financial aid administrator (FAA) perspectives and challenges in implementing this legislation in one western state.

Literature Review

Prior to discussion of the law, background information about students experiencing homelessness and this group's abilities to apply for the Free Application for Federal Student Aid (FAFSA) in order to have an opportunity to achieve a college degree is provided. Due to the numerous methodical challenges such as different definitions between educational institutions and public agencies, the social stigma of being identified as homeless, and recent economic recessions (Clemmitt, 2013) the actual numbers of homeless college students can only be viewed as estimates. Organization advocacy personnel, experts in this field, and human service professionals are in agreement that these numbers should be considered low and the actual numbers are considerably higher than reported. With these caveats in mind, yearly estimates demonstrate that between 1.6 and 2.8 million youth run away from home or are forced to leave their home (National Runaway Switchboard, 2010).

Public school officials (K–12) identified 91,351 unaccompanied homeless youth for the 2013–2014 school year; a 20% increase from the previous year (U.S. Department of Education, 2014). According to the most recent data (2013–2014), 56,244 FAFSA applicants were determined to be unaccompanied homeless youth, either in responses to the FAFSA questions or as determined by a federal aid administrator (U.S. Department of Education, 2015, unpublished raw data). Bishaw (2013), in his examination of U.S. census data, found that over half of college students who were not living with relatives had incomes below the federal poverty guidelines. These statistics demonstrate that the population of unaccompanied youth are increasing, are

predominately poor, and significant numbers of these youth are enrolled in higher education institutions.

College Cost Reduction and Access Act of 2007

Before 2007, unaccompanied homeless youth who wanted to go to college and obtain a degree were highly unlikely to do so due to the significant and insurmountable financial barriers unless some type of federal and/or state aid was provided. The FAFSA is required for any student who wants to apply for federal or state financial aid. The FAFSA also requires students to provide financial information from their parents or guardians in order to determine student eligibility for aid and mandates a parental/guardian signature. While these requirements were logical for most applicants, they created an insurmountable barrier for unaccompanied homeless youth who did not receive financial support from their parents and did not have access to parental information. These stipulations have been detrimental for unaccompanied homeless youth because they often have not had any contact with their parents (National Association for the Education of Homeless Children and Youth, 2011).

Due to these concerns and pressure from advocacy groups across the nation, Congress enacted the College Cost Reduction and Access Act (CCRAA) on September 27, 2007 (2012; P.L. 110-84). This legislation reauthorized the Higher Education Act and expanded the definition of "independent student" to include youth who are (a) unaccompanied and homeless, or (b) unaccompanied, self-supporting, and at-risk of homelessness. The CCRAA used the education subtitle McKinney-Vento Act's definitions of homeless, which included youth who lack a fixed, regular, and adequate nighttime residence; and unaccompanied, which includes youth not in the physical custody of a parent or guardian. The CCRAA also used "at-risk of homelessness," which the U.S. Department of Education (ED) defined in its guidance to refer to students whose housing may cease to be fixed, regular, and adequate (U.S. Department of Education, 2015–2016).

Specifically, the law allows youth to be considered independent if they are verified as unaccompanied and homeless during the school year in which the application is submitted or unaccompanied, at risk of homelessness, and self-supporting. Verification must be made by one of the following authorities: (a) a McKinney-Vento Act school district liaison; (b) a U.S. Department of Housing and Urban Development homeless assistance program director or their designee; (c) a Runaway and Homeless Youth Act program director or their designee; or (d) a financial aid administrator at a college or university (CCRAA, 2012). Lastly, these regulations also indicate that unaccompanied homeless youth must go through this determination process every year. That is, a youth

who is homeless or at risk of homelessness must be re-interviewed and provide documentation and demonstrate continued homeless or risk of homelessness.

Available research on unaccompanied homeless college students' experiences in obtaining and receiving federal and/or state aid is almost non-existent. This lack of knowledge is also evident in the financial aid officers' viewpoints and perceptions of the implementation process for this law (Cochrane, LaManque & Szabo-Kubitz, 2010; Cochrane & Szabo-Kubitz, 2009). In 2014, the National Association for the Education of Homeless Children and Youth (NAEHCY) and the National Association of Student Financial Aid Administrators surveyed over 900 professionals (college access programs, service agencies, public schools, and higher education institutions) on how unaccompanied homeless youth access federal financial aid. Data from the NAEHCY's Higher Education Phone Helpline[1] (students, parents, schools, universities, and agencies) was also included in the analyses (NAEHCY, 2014).

The first result indicated that the majority of public school respondents (80%), youth service providers (90%), and college financial aid respondents (57.5%) knew about the policy and understood the requirements. In contrast, only 18.5% of the college access program participants had familiarity with the law. The majority of these professionals also did not come into contact with this population; 41.6% of the public school respondents and 71% of the college access program participants indicated that no unaccompanied homeless youth had been identified in their respective programs. The majority of service providers and college access program staff members also noted that the primary barrier in receiving financial aid was the requirement of additional documentation youth were required to produce for financial aid officers. This finding was also evident in the helpline data. Close to 30% of phone contacts were related to documentation challenges. In contrast, the majority of financial aid administrators indicated that the youth could not provide additional documentation that was required to determine the status of "independent student" (NAEHCY, 2014).

In a related study, Cochrane and colleagues (2010) reviewed 59,057 financial aid records of students from thirteen community colleges in California to investigate the FAFSA process for students. Interviews with

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[1] Via a toll-free number and email, the NAEHCY Higher Education Helpline serves youth, educators, parents, financial aid offices, and others seeking guidance on higher education issues faced by students experiencing homelessness. Helpline contacts consisted of admissions counselors (3 contacts), case managers (8 contacts), financial aid administrators (46 contacts), other higher education staff (42 contacts), high school counselors (17 contacts) school district liaisons (72 contacts), social service agencies and social workers (19 contacts), state coordinators (29 contacts), parents (10 contacts), and students (133 contacts).

eleven FAAs from these colleges were conducted and student surveys (*N* = 260) were collected. Colleges must verify up to 30% of their Pell-eligible (low-income) applicants; however, the ED and colleges verify at much higher rates. In this study, the results indicate that over half (54%) of the Pell-eligible students' records were flagged by the ED for these FAAs to verify information on the students' applications; the share of Pell-eligible applicants at each college ranged from 49% to 65%; and successful verification rate ranged from 56% to 76%. Students selected for verification were also less likely to receive grants than those who were not. Almost two thirds of students who appeared to be Pell-eligible but had not completed the application process either did not know the status of their application or incorrectly identified it as completed. In the interviews with FAAs, the primary barrier of a student to a Pell Grant was the requirement of additional documentation not mandated from the ED or federal legislation, such as copies of a student's drivers license or a signed receipt of aid eligibility requirements (Cochrane, et al., 2010).

Methodology

Participant Sample

This research study is based on data from two research studies that were both conducted by the first author. First, semi-structured qualitative interviews were conducted with 20 homeless community college students ages 18–24 using a purposive and snowball approach (Creswell, 2007). Participants were recruited from homeless shelters, a homeless outreach program, a foster care transitional youth facility, and a community based organization. The definition of "homeless" for this study is based on the education subtitle of the McKinney-Vento Act of 2001. After informed consent was obtained, the youth were asked a number of open-ended questions. Interviews lasted approximately 60 minutes, were audiotaped, and were transcribed verbatim. The participants were given gift cards as incentives for participation and pseudonyms were used to protect confidentiality. The California State University, Long Beach Institutional Review Board approved this study.

A semi-structured protocol was used to elicit responses from students. The questions and probes in the interviews focused on the youth's experiences with financial aid policies and practices that were seen as beneficial and/or challenging. Specifically, participants were asked questions focused on: (a) their perceptions of themselves, (b) their knowledge of college services and how they used the financial aid office, and (c) the barriers they experienced in college.

Second, semi-structured qualitative phone interviews were conducted with eight financial aid administrators (FAA) from eight university campuses using a purpo-sive and snowball approach (Creswell, 2007). Participants were identified through university administration and were asked to participate. A semi-structured protocol was used, and sought FAA perspectives on (a) how they experienced their work specifically with students who experience homelessness, (b) what supports they provided to students, and (c) what barriers they perceived in their work with students.

Data Analysis

The primary method used to analyze the interview data was the constant comparative method (Glaser & Strauss, 1967). This method helped to generate an understanding of college and university financial aid practices and to explore overarching presumptions that influence the experience of students. Open coding was conducted on each transcript produced from the interviews (Corbin & Strauss, 2008), with two cycles of coding used to first draw out initial themes. The first cycle reduced data into preliminary codes and themes based on understandings of the research questions (Creswell, 2007) and openness was maintained with all ideas presented by the participants without preconceived notions about what codes and themes might appear (Saldaña, 2009). Codes and themes were then changed and reorganized throughout the initial analysis process to determine the most accurate and descriptive analysis possible (Creswell, 2007; Lincoln & Guba, 1985).

The second cycle was used to deepen the clarity of the first cycle, classifying, prioritizing, synthesizing, and conceptualizing the data (Saldaña, 2009). The process allowed for revisions of the code list, including development of more accurate wording for previously vague or inaccurate codes, inclusion of newly discovered codes, and consolidation of redundant codes. Meta and focused coding were used during this cycle, including the diagraming and reviewing of codes in order to develop cohesive themes that appeared in all of the interviews.

Findings

Applying for financial aid can be a daunting process for most students; however, for youth experiencing homelessness it may be the difference between building a new life and continued homelessness. Students and FAAs in this study understood the need for an expedient financial aid process. However, when encumbered by extensive verification procedures, the financial aid process impeded students' progress. These results showed the process from both the perspective of the homeless student and the perspective of FAAs. Throughout the coding of transcripts, three centralizing themes emerged from the data: (a) barriers and supports students encounter with receiving financial aid, (b) barriers and supports FAAs experience providing financial

aid to students experiencing homelessness, and (c) the tension between the need to manage responsibilities of the financial aid office and the needs of students to attend college.

Student Perspectives

Overall, the 20 students in this study understood the importance of earning a college degree, expressing a great deal of motivation for going to and staying in college. All wanted to be sustainable adults, no longer homeless, and in jobs that would lead to an independent adulthood. All of the participants were dependent on financial aid and all were maintaining a fine balancing act as they attempted to manage their housing instability. Because of their financial instability, it was paramount for students to receive financial aid and to receive it on time once the verification process was completed. Participants reported barriers and supports to receiving their financial aid.

Barriers for students receiving financial aid. Providing documentation to demonstrate homelessness was paramount in discussions of financial aid. Typically, letters from shelters and other documentation were requested to prove the students' independence from their parents. Those outside of the shelter system discussed how difficult it was to provide such documentation. Penelope spoke about how difficult it was to prove homelessness when she was outside of the shelter system.

> Because, like, if, like, it says if you were "at risk of being homeless" or something…and, like, how do you prove that? And then, when I finally got into here [shelter], it was a lot easier because I had, obviously, official documents. But before that, sometimes you don't have those documents. And those situations are completely true and valid, but there's no way for you to prove them…when they want those letters that don't exist. The thing is, how do I prove any of this?

Many students in shelter found it easy to acquire documentation; however, most also discussed that prior to having shelter status, there was no way to obtain documentation. Detached from familial and social networks, students had no links to professional or personal relationships to verify their status. Beyond these constraints, some students were asked for documents that were not required. Hailey told an FAA that she was homeless, but was still asked for her parents' tax records, which, by law, were not required. For Hailey, this meant getting in touch with her mother with whom she had a contentious, unhealthy relationship.

> They had me running around like eight times going back and forth to the Financial Aid Department because of my mom's stuff…I don't even live with

them… I just had my mom go down there…my mom's one of those crazy White ladies that be yelling at the whole world, so…that's when they started, like, taking me seriously…even after I turned in all my papers, they said that it would take 4 to 6 weeks.

Many of the youth expressed extreme frustration with the obstacles presented by the financial aid office, all while attending school with no college financial aid. Hailey, like others who had extensive experience working with human service agencies such as child protective services and homeless agencies, pushed hard to advocate for herself and navigate the financial aid system. Others, who had not had similar experience asserting their needs with service providers, were not able to advocate for themselves so easily.

When the financial aid process was completed, many participants reported receiving the funds much later than promised. As Kassandra stated, "So, imagine if I wasn't in the [temporary housing] program and financially that was the only thing I was really relying on?" Students talked about reaching a desperation point; they had to pull together resources for the entire semester (about four months) because they did not receive their funds until the week of final exams—the end of the semester.

Many of the students worked with financial aid staff who were not clear about this law and made a difficult situation worse. The CCRAA clearly states that homeless youth are not required, by law, to show the documentation of their parents (CCRAA, 2012, P.L. 110-84). However, several participants, like Penelope, Nathaniel, and Hailey, were asked for this information. Artificial barriers led to an enormous amount of energy and expense for the students to work out the logistics with the FAA and/or in attempts to locate family members. This lack of knowledge resulted in students having to wait months to get financial aid and impacted their ability to achieve academic success in their classes.

Support for students receiving financial aid. The positive experiences other homeless youth described demonstrated how efficient financial aid could be. Some found that a variety of financial aid policies, practices, and services were implemented in a seamless and accommodating way. Ginny, for example, received her financial aid in a timely manner and was able to manage her money throughout her semester. Rachel, like others, also spoke about a helpful experience speaking with FAAs.

> [They were] extremely helpful…even the staff there, they answered whatever questions you need to answer and help you with the process because I didn't know what I was doing, so they helped me a lot with that.

Unlike students who had been homeless prior to attaining a shelter, Rachel attained stable, temporary housing during the summer before the school year started. Since she had access to necessary documents from shelter staff, she was able to go to financial aid with documents in hand, ask questions, and receive services before the financial aid administrator was busy with other students during the first weeks of the semester.

Students needed financial aid to succeed in reaching their goal of a college education. When the process worked, it relieved some of the financial stress. Youth who reported having readily available financial aid spoke about working less and universally feeling less stressed about meeting so many demands, no doubt freeing them up to focus more on their educational studies.

Perspectives from Financial Aid Administrators

Eight FAAs provided insight on the benefits and barriers that they experienced in implementation of the CCRAA. All participants had received training related to the stipulations of CCRAA and how to facilitate the financial aid process for students experiencing homelessness; however, there was a large variance among them on how they implemented those strategies.

Identification. All of the FAA participants spoke about the financial aid process using language drawn directly from CCRAA as a part of the FAFSA. Universally, FAA participants found the process easiest to facilitate when they had letters or direct contact with K–12 district homeless liaisons or homeless shelters. Several FAAs discussed how students had not indicated their homelessness on their FAFSA, but disclosed this status as a part of a meeting in the office.

Three FAA participants spoke about additional forms, along with the FAFSA, that were required to establish homelessness. Katrina described a form that had many special population designations, among them homelessness. Along with that form, students were required to provide letters to verify their homeless status.

> So what we do [after the additional form] is that we have the student provide us with two letters from two people, not a friend, not a boyfriend or girlfriend friend, it can be another relative. It could be clergy. It could be law enforcement. It can be a counselor or somebody like that or a teacher that is aware of their situation…We ask them where they're living and that's when we delve a little bit deeper. Where are you living? How long? Do you have any financial assistance? Any contact with parents? We start asking those kinds of questions so that we're able to gather all that information to the point that we really feel like the student is sincere and the student is not just telling us a story to get extra money.

Though there was flexibility with who could provide verification letters for homelessness, Katrina described a layer of verification that is not required by law and described by students as difficult to attain as they may not have connections to people capable or willing to provide this information. Katrina also described a string of questions that, while well intended, were invasive for students seeking the financial aid for which they were eligible. Katrina expressed impassioned empathy for students as she said, "They're situation is real and at that point, we do whatever we can do to help them;" however, the policy of engaging students in this extensive process, in some cases, may have been weeding out eligible students.

This questioning of students during the verification process was consistent with all of the participants. Virginia, again an FAA who expressed emphatically that students must have support in their financial aid process, described questions aimed at clarifying student status. Beyond questions, FAA participants described a long list of letters and documents that might be required to prove homeless status. These documents included letters from family, clergy, counselors, doctors, teachers, or high school counselors, and family court documentation or court documents showing legal guardianship or emancipation.

Fear of fraud. Several of the FAA participants spoke of how important it was to ensure that financial aid stipulations were used ethically. They spoke of their commitment to student progress, but also their commitment as gatekeepers for taxpayer money that needed to be protected from fraudulent behavior. They were, at times, wary that the homeless designation might be inappropriately used and were determined that parents, when available, be held responsible for the college expenses of their children.

Most of the FAA participants expressed a concern for possible subterfuge. Carlos spoke about having heard a private program provider from outside of his university talking about advice given to students to inappropriately use the designation to seek higher financial aid awards. In this interaction, Carlos heard the provider saying that he had advised students to try to use the designation of homeless to receive a larger financial aid award. Based on this conversation, Carlos took part in a policy to enhance the verification process with extra documentation from students to ensure that their homeless designation was valid.

> It wasn't something to ostracize students or to overburden them. The paperwork is something that they would have readily available through the means that they've gotten it verified…we wanted to go ahead and do some sort of verification piece of it just to ensure that it was still meeting with the intention of the Department of Ed.

Carlos' statements echoed a variety of concerns that the designation be used only when needed and appropriate. He also echoed the perceptions of other FAA participants that getting the verification not be cumbersome for students, but that the necessary documents should be "readily available" for students to provide.

FAA participants had concerns about fraudulent behavior, but also about accountability. Lisette, Carlos, Damita, and Dee all brought up the possibility of getting audited. Consistently, participants felt, "We need to have some kind of proof." As previously mentioned, there was great flexibility in what these documents could be, but two of the participants suggested that two or three documents were needed after a meeting with the student where the student explained, verbally or in writing, the circumstances of their living arrangements. At the same time, the FAA participants recognized how challenging this could be for students. Lisette was adamant about "proof" of homeless status, but after saying that, she recognized how many steps she had described for students to document their homeless circumstance.

> There's still a lot of, maybe, red tape, if that's the word, or a lot of bureaucracy around trying to get students aid…What if they don't have documentation? What if it just happened? What if it got burnt down in a fire or something, right? That's their reality, right?…I know that sometimes that's not always in the students' best interest, especially if there's nothing that they can provide, right?

While many FAAs articulated concern that students might be dishonest, none reported having actual experiences with students who appeared to be misrepresenting their circumstances. In fact, many suggested the opposite. In her response to a question related to students who had been disingenuous, Katrina articulated her overwhelmingly positive perception of students that mirrors much of what others said as well.

> I haven't had any [students who cheat]…they're really humble. And if they come in, it takes a lot for them to come in and really admit to something like that [homelessness]. So when they come in, they are honest. They are sincere and they are really in desperate need. So I haven't experienced any student that I think has not been sincere about the process.

All of the FAAs were adamant about their desire to support students, but found it challenging to both support students and act as gatekeepers.

Strategies of support. FAAs gave many examples of how they and their colleagues in and beyond financial aid worked collaboratively to facilitate the college experience for students experiencing homelessness. Carlos

and Dee spoke about how linkages between the financial aid office and other student support services had facilitated a range of services (e.g., counseling, temporary food and housing, academic programs) for students that had not existed before the passage of this law. Carlos also emphasized the importance of making the connection between the student and the supportive service by either providing a specific contact person or, at times, physically walking a student to the specific office. Carlos emphasized the importance of this intervention to ensure students did not "fall through the cracks."

This linkage with support services also allowed student support services to understand how to refer students back to FAAs as some students did not know the financial aid office could help them. FAAs reported that students do not always know how to use financial aid, how to use the homeless designation, or how to explore loan options. All of the FAAs stated that the links between financial aid and other resources allowed students greater opportunities to sustain themselves in college.

FAAs in this study found themselves between a rock and a hard place. Compassionate and sympathetic to student needs, FAAs comments conveyed that while they intended to follow the letter of the law, their role was to go beyond the requirements of the law to ensure that funds were being distributed appropriately. These practices created unnecessary barriers for unaccompanied homeless youth; student participants overwhelmingly expressed the need to receive their financial aid without obstruction. These competing perspectives leave policy makers, practitioners, and researchers with opportunities to work closely to remove barriers for students.

Discussion

Findings from this study demonstrate similarities with other research and offer new information that requires greater attention. Consistent with other studies (Cochrane & Szabo-Kubitz, 2009; Cochrane et al., 2010), many of the students were required to prove they were homeless with additional documentation that was not required under the law. This mandate led to long delays in obtaining financial aid and created unnecessary barriers. For some students, the experiences were positive; FAAs provided clear direction, linked students to other supportive services, and completed the necessary paper work for the students to get financial aid in a timely manner.

Interestingly, the administrators appeared to be ambivalent about their role; gatekeeper for the taxpayers versus ensuring financial support for students. On one hand, the FAAs were not confident that the students were homeless and therefore required documentation to prevent fraud. They also feared that they themselves

would be audited and needed to show proof of granting independent status for the student. Conversely, FAA participants also demonstrated willingness to assist students with getting financial aid and connecting the students with other services on campus.

Limitations

In terms of limitations, this study only focused on participants in California who either attended a community college or were employed at a public university. It also relied on recruitment of participants who were in the scope of service providers, such as shelters. Consequently, these factors limit the ability to generalize the findings. Lastly, the conclusions the researchers made about the policy knowledge and related actions of the financial aid administrators and students must be viewed as tentative due to the sole focus in one state with its own interpretations of the federal legislation.

Implications for Practice, Policy, and Research

As shown in the findings, the level of documentation that is required to demonstrate that these college students are actually homeless is a significant burden for both students and FAAs. To address these concerns, training is recommended. Specifically, FAAs need to be educated on the federal definition of homelessness and the homeless youth provisions of the CCRAA. Training also should include the recent guidelines issued by the U.S. Department of Education to assist FAAs; it specifically instructs FAAs on their obligation to make determinations, the types of documentation that may be considered, and how to proceed if a youth is unable to produce documentation (U.S. Department of Education, 2015–2016; U.S. Department of Education, 2015).

In addition, social workers, human service professionals, K–12 public school personnel, institutions of higher education, college access programs, youth services, and college students should also receive this type of training to increase the chances for youth who are homeless to obtain financial assistance. McKinney-Vento liaisons at the K–12 level and social workers should also reach out to local FAAs to discuss their respective roles and ways they might collaborate to improve access to financial aid for homeless youth. Many high schools have had success with an annual "McKinney-Vento FAFSA Week," a specifically designated week to ensure that schools identify and assist all homeless youth to complete the FAFSA. Sample announcements, letters, presentations, and scripts are available as part of NAEHCY's Unaccompanied Youth Toolkits for Counselors and Liaisons.[2]

The present study underscores the value of linkages between FAAs and other student support services. A recommended practice to create these linkages is the designation of a single point of contact (SPOC) at institutions of higher education. Consistent with FAA comments that direct links ensure that students will not "fall through the cracks," the SPOC is a supportive college administrator who helps unaccompanied homeless youth to navigate the college-going process. Similar to the McKinney-Vento liaison at the K–12 level, SPOCs implement a streamlined process to facilitate communication and quick referrals among departments and services on their campus. To date, four states have designated SPOCs at every college and university statewide, and many individual institutions are replicating this practice.[3]

Lastly, the data suggests that FAAs do not have a nuanced understanding of college students who are homeless as evidenced by requiring the youth to "prove" they are homeless due to concerns of fraud. Colleges and universities can provide training for staff in order to reduce some of the negative assumptions and stereotypes related to homelessness.

In exploring possible policy recommendations, it should be noted that the federal government is in the process of reauthorizing the Higher Education Act. Consequently, the Higher Education Access and Success for Homeless and Foster Youth Act of 2015 was recently introduced in the U.S. Senate and House of Representatives and contains of a number of recommendations that the authors endorse and are supported by the findings of this study. Specifically, the eligibility determination requirements must be made clearer in order for the FAAs to accurately assess each student. It also must provide enough detailed information to reduce subjectivity and confusion for the FAAs. Second, the process must be streamlined and a SPOC for students should be established. Lastly, in order to reduce barriers and expand supports for youth who are homeless, college access programs and publicly and privately funded homeless shelters must be given the ability to verify a youth's status as homeless and unaccompanied.

Research is also needed to examine the practices of the FAAs in implementing this policy and its related impact on students. This study could be replicated in other states and include four-year state and private universities and colleges. Interviews with students and FAAs from four-year public and private universities in different states would provide a more nuanced understanding of how this law is implemented, the common barriers, supports, and what policy changes are warranted. This information can inform efforts in revising the policy, training staff, and educating youth.

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[2] For NAEHCY's Unaccompanied Youth Toolkits for Counselors and Liaisons, see http://naehcy.org/toolkit-high-school-counselors

[3] For more information about how to designate a SPOC, see http://www.naehcy.org/sites/default/files/dl/spoc-tips.docx

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