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Report to the Ranking Member, Senate Committee on Health, Education, Labor, and Pensions

GAO

May 2016

HIGHER EDUCATION

Actions Needed to Improve Access to Federal Financial Assistance for Homeless and Foster Youth

Accessible Version

GAO Highlights

HIGHER EDUCATION

Actions Needed to Improve Access to Federal Financial Assistance for Homeless and Foster Youth

Why GAO Did This Study

Homeless youth and youth in foster care are often unprepared for the transition to adulthood. Given the economic benefits of college, GAO was asked to examine the college experiences of these vulnerable youth.

GAO examined (1) college enrollment and completion for foster and homeless youth, (2) the extent to which challenges these youth face affect their ability to pursue college, and (3) the extent to which program barriers hinder these youth from obtaining federal financial assistance for college. GAO analyzed the most recently available Education data—two enrollment data sets, for 2011-2012 and 2013-2014, and data on college completion from 2009; reviewed relevant federal laws and guidance; interviewed officials from Education and HHS, as well as external groups knowledgeable about higher education, foster youth, and homelessness; and held discussion groups with foster and homeless youth.

What GAO Recommends

GAO is making six recommendations to Education and HHS to improve homeless and foster youth access to financial assistance for college, including centralizing college information for these youth on Education's website, clarifying Education guidance, and considering legislative proposals to simplify federal requirements for homeless and foster youth. HHS agreed with these recommendations while Education generally did not agree or disagree, but described actions it was taking in response to the recommendations.

What GAO Found

Available research suggests that a lower percentage of youth who have been in foster care enroll in and complete college compared to other youth, but little is known about homeless youth. While the Departments of Education (Education) and Health and Human Services (HHS) administer programs that can help them with college, Education data from 2009 (the latest available) indicate that a lower percentage of foster youth complete a bachelor's degree within 6 years (14 percent) compared to other students (31 percent). Education has begun to collect data on homeless youth and plans to have some college completion information by 2017. Education data also show that homeless and foster youth who attend college pursue an associate's degree to a greater extent than other students.

Homeless and foster youth experience challenges, such as weak academic foundations, limited family support, and lack of awareness of available financial resources, making it harder for them to pursue college, according to stakeholders GAO interviewed. With few adults in their lives, homeless and foster youth in GAO discussion groups said it is hard to navigate complex college application and financial aid processes. Education officials and other stakeholders told GAO that these youth are often not aware of financial resources for college. Federal law requires Education to provide accessible information on financial aid, but its website has limited information on college resources directed towards homeless and foster youth. The lack of easily accessible and tailored information can make it difficult for these youth to learn about and obtain federal assistance for college.

Burdensome program rules can make it more difficult for unaccompanied homeless youth (those not in the physical custody of a parent or guardian) and older foster youth to obtain federal financial assistance for college.

- Homeless youth: Unaccompanied homeless youth are required by law to have their status verified by either an official of specified federal homeless programs or a college financial aid administrator each time they apply for federal grants and loans. Obtaining documentation from specified program officials after the first year of college can be difficult because these programs generally do not serve homeless youth throughout college and because Education guidance on the role of these officials is unclear. Further, according to Education officials and other stakeholders, financial aid staff are often reluctant to determine that a student is unaccompanied and homeless without making extensive documentation requests, yet homeless youth living in a car or tent can find it difficult to document these tenuous living situations.

- Foster youth: Age criteria in federal law can hinder access to an HHS program that provides a voucher for college expenses to foster youth up to age 23, but only if they were receiving the voucher at age 21. Foster youth who start college after age 21 are not eligible for the voucher.

These barriers to accessing financial assistance contribute to the challenges these youth face trying to attend and complete college, but Education and HHS have not developed legislative proposals to address them.

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Abbreviations

BPS	Beginning Postsecondary Students Longitudinal Study
Chafee ETV Voucher	Chafee Education and Training Voucher Program
COD	Common Origination and Disbursement System
CRS	Congressional Research Service
Education	Department of Education
FAFSA	Free Application for Federal Student Aid
GED	General Education Development
HHS	Department of Health and Human Services
HUD	Department of Housing and Urban Development
NPSAS	National Postsecondary Student Aid Study
SPOC	Single Point of Contact

441 G St. N.W.
Washington, DC 20548

May 19, 2016

The Honorable Patty Murray
Ranking Member
Committee on Health, Education, Labor, and Pensions
United States Senate

Dear Senator Murray:

An estimated 32,000 unaccompanied youth ages 18 through 24 were homeless on a single night in 2015, and more than 22,000 youth aged out of the foster care system in fiscal year 2014, reaching college age without having the support of relatives or adoptive parents.[1] These two vulnerable populations have similar experiences. For example, homeless youth, like youth who have been in foster care, may have experienced parental abuse and neglect. Similarly, youth who are no longer in foster care can end up homeless or without other services. Advocates and others knowledgeable about homeless and foster youth have expressed concerns that these youth lag far behind their peers when it comes to attending and graduating from college. The economic benefits of a college education are well documented—for homeless and foster youth, earning a degree can mean more financial stability when transitioning to adulthood so that they can establish independent, productive lives. However, to the extent that homeless and foster youth are unable to attend college, they may be unprepared for the transition to adulthood, unable to support themselves, or experience continued homelessness.

The Department of Education (Education) is responsible for administering federal student aid programs—such as Pell Grants and federal loans—

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[1]Numbers of homeless and foster youth were the most recent data available during our review. Information on the number of homeless youth is from the U.S. Department of Housing and Urban Development's (HUD) *2015 Annual Homeless Assessment Report* to Congress. HUD's point-in-time estimate is for a single night in January 2015 and represents unaccompanied homeless youth from ages 18 to 24 who were by themselves. An additional 20,700 homeless youth ages 18-24 were with their families on that date. Information on the number of youth aging out of foster care is from the U.S. Department of Health and Human Services, Administration on Children, Youth and Families, Administration for Children and Families, Children's Bureau, *The AFCARS Report*, #22, http://www.acf.hhs.gov/sites/default/files/cb/afcarsreport22.pdf. Data on foster youth represents preliminary fiscal year 2014 estimates as of July 2015.

that help low- and middle-income students cover the cost of attending college.[2] The Department of Health and Human Services (HHS) administers the Chafee Education and Training Voucher Program to help older foster youth pay for college and the Runaway and Homeless Youth Transitional Living Program, which funds shelters and services to help homeless youth become self-sufficient, including assistance with college planning.

In light of the economic benefits of college, you asked us to examine the challenges and barriers affecting the ability of foster and homeless youth to pursue a college education.[3] Specifically, we analyzed (1) What is known about college enrollment and completion for youth who have been in foster care or who are homeless?(2) To what extent do challenges identified by researchers and stakeholders affect the ability of foster and homeless youth to pursue college? (3) To what extent do program barriers exist that could hinder these youth from obtaining federal financial assistance for college?

For the first objective, we analyzed available data from three federal databases: (1) administrative data from Education's Common Origination and Disbursement System for 2013-2014, as well as (2) data from the nationally representative National Postsecondary Student Aid Study (NPSAS) for 2011-2012 and (3) the Beginning Postsecondary Students Longitudinal Study (BPS) for 2009. These were the most recent data available for each database at the time of our review. We assessed the reliability of these data by reviewing existing information about the data and the systems that produced them and interviewing agency officials knowledgeable about the data. We determined that the data were sufficiently reliable for the purposes of this report. To supplement our data analyses, we also reviewed available studies on college enrollment and completion for foster and homeless youth. We assessed the quality of these studies by evaluating the methods used in the research and identifying any limitations. In analyzing college outcomes for homeless youth, we focused on unaccompanied homeless youth—those who are not in the physical custody of their parents or guardians—rather than all

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[2]For this report, we define federal student aid programs as financial aid programs authorized under Title IV of the Higher Education Act of 1965, as amended.

[3]In this report, we use the term college to refer to a variety of postsecondary programs, including certificate and associate degree programs.

homeless youth because data are available only for this group of homeless students. Available data report on youth who have been in foster care any time since they turned age 13.

For our second and third objectives, we interviewed officials from Education, HHS, and the Department of Housing and Urban Development (HUD), as well as officials from numerous organizations knowledgeable about child welfare, homelessness, and higher education issues. We also reviewed relevant federal laws and guidance on federal student aid and relevant foster care and homeless youth programs to understand the context for any barriers to program access.[4] To obtain information and perspectives on program access for homeless and foster youth, we also interviewed state education and other officials in California, Colorado, Michigan, and Virginia. We selected these states based on several criteria, including the number of foster youth ages 16 to 21 in the state, the number of homeless applicants for federal student aid, and geographic distribution. We also interviewed college financial aid administrators at three colleges in other states, based on the recommendation of a national organization of financial aid administrators.[5] The views of these state officials and college financial aid administrators are nongeneralizable. Further, we convened two discussion groups with homeless youth and two discussion groups with foster youth to obtain nongeneralizable information directly from them on any challenges and access issues they faced in enrolling in and completing college. We assessed Education's efforts to provide information on federal student aid and access to these programs with related provisions in the Higher Education Act as amended by the College Cost Reduction and Access Act and with Education's strategic plan and federal standards for internal controls (see app. I for more information on our methodology).

We conducted this performance audit from October 2014 to May 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain

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[4]In analyzing program access, we focused primarily on unaccompanied homeless youth because they identify themselves as such when they apply for federal student aid, while homeless youth living with their families are not distinguishable from other students.

[5]We also interviewed another college financial aid administrator in Michigan who participated in the state interview. The three other financial aid administrators were from colleges located in Maryland, North Carolina, and Ohio.

sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Education Programs That Support Homeless and Foster Youth

Education is responsible for administering federal student aid programs that provide grants and loans to students to attend college, managing the application process for these programs, and administering support services for homeless children and youth in elementary and secondary schools.

Federal Student Aid Programs

Education administers federal student aid programs that provided $128.7 billion in assistance to almost 12 million eligible college students and their families in fiscal year 2015.[6] The main federal grant and loan programs that Education administers are:

- **Federal Pell Grant Program:** Pell grants are awarded to low-income undergraduate students who have not earned a bachelor's or a professional degree. These grants do not need to be repaid. Students may be eligible to receive a Pell Grant award for up to the maximum lifetime limit of 12 semesters or their equivalent. The maximum award amount for the 2015-2016 award year is $5,775. In fiscal year 2015, Education distributed $29.9 billion in Pell Grants to eligible low-income students.

- **William D. Ford Federal Direct Loan Program:** To help cover the cost of college, eligible students may receive federal student loans, which must be repaid with interest. For the purposes of federal student aid eligibility, a student is considered to be either financially dependent on his or her parents or financially independent. Undergraduate students who are independent of their parents may

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[6]Title IV of the Higher Education Act of 1965, as amended, authorizes the federal government's major student aid programs, which are the primary source of direct federal support to low and middle-income students pursuing postsecondary education. 20 U.S.C. § 1070-1099d and 42 U.S.C. §§ 2751-2756b.

qualify to borrow up to $9,500 during their first year, while dependent undergraduate students may borrow a maximum of $5,500.

Support Services Provided by Education

Education also provides support services for homeless children and youth in school up through grade 12.[7] The key federal education program for these youth is the McKinney-Vento Education for Homeless Children and Youth Program, which requires all school districts to designate a McKinney-Vento homeless liaison to help homeless students succeed in school.[8] For unaccompanied homeless youth who apply for federal student aid, McKinney-Vento homeless liaisons may verify that a student is an unaccompanied homeless youth. For fiscal year 2015, Congress appropriated about $65 million for Education to administer this program, and about 1.3 million homeless children and youth were served during the 2013-2014 school year, the most recent year for which data are available.

Applying for Federal Student Aid

To apply for federal student aid programs, students must submit the Free Application for Federal Student Aid (FAFSA), which asks for financial and other information from the student. Information from the FAFSA determines whether a student is considered either financially dependent on his or her parents or financially independent for the purpose of determining federal student aid eligibility. Most college students attending an undergraduate school are considered dependent students and must provide parental income information on the FAFSA.[9] If a dependent

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[7]Education also provides support services through several of its Federal TRIO programs to help disadvantaged students (such as low-income and first-generation college students) prepare for and enroll in college. For example, the Student Support Services program aims to improve the undergraduate student retention and graduation rates of its participants by providing support services, such as academic tutoring and assistance in completing college financial aid applications. While foster and homeless youth are eligible for TRIO services, Education does not track the number of homeless and foster youth participating in TRIO programs, according to agency officials.

[8]Under the Education for Homeless Children and Youth grant program, states and their school districts are required to identify homeless children and provide them with needed services and support. The Education for Homeless Children and Youth Program was initially authorized by Title VII-B of the Stewart B. McKinney Homeless Assistance Act, Pub. L. No. 100-77, 101 Stat. 482, 525 (1987), codified as amended at 42 U.S.C. §§ 11431-11435. The Education for Homeless Children and Youth Program was most recently amended and reauthorized by the Every Student Succeeds Act, Pub. L. No. 114-95, §§ 9101-9107, 129 Stat. 1802, 2124 - 2137 (2015).

[9]For dependent students, eligibility for the type and amount of federal student aid is based on such factors as the student's and parents' income and assets, as well as family size and whether the family has other children enrolled in college. 20 U.S.C. § 1087oo.

student does not provide information on parental income, the FAFSA will be considered incomplete and the student will not be eligible for federal student aid. Certain students—such as those who are married, are veterans, are age 24 and older, or those attending a graduate or professional school—are defined as independent students for the purpose of federal student aid and do not need to provide parental financial information on the FAFSA.[10] By law, students who have been in foster care after the age of 13 or who are verified as unaccompanied homeless youth are also considered independent.[11] The terms "unaccompanied youth" and "homeless child and youth" are defined in the McKinney-Vento Homeless Assistance Act.[12]

The FAFSA asks a series of questions to identify unaccompanied homeless youth. For students who are not already determined to be independent, the online FAFSA asks all students a general screening question about whether they are homeless or self-supporting and at risk

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[10]20 U.S.C. § 1087vv(d)(1). For independent students, eligibility for the type and amount of federal student aid is based on such factors as the student's and, if married, spouse's income and assets and whether the student has any dependents other than a spouse, as well as the number of family members enrolled in college. 20 U.S.C. §§ 1087pp and 1087qq.

[11]Specifically, students who are in foster care or who have been in foster care at any time since they turned 13 years of age are defined in the Higher Education Act as independent students. 20 U.S.C. § 1087vv(d)(1)(B). In addition, students who are verified during the school year in which the FAFSA is submitted as an unaccompanied youth who is a homeless youth or is at risk of homelessness and is self-supporting are defined in the act as independent students. 20 U.S.C. § 1087vv(d)(1)(H). For the purpose of this report, we will refer to these students as homeless youth or unaccompanied homeless youth. In addition, foster youth refers to both current and former foster youth in this report. These categories of individuals were added to the definition of independent students by the College Cost Reduction and Access Act, Pub. L. No. 110-84, § 604(a), 121 Stat. 784, 806 (2007).

[12]According to the McKinney-Vento Homeless Assistance Act, being homeless means lacking fixed, regular and adequate housing and includes those living in shelters, parks, motels or cars, as well as those temporarily living with other people. 42 U.S.C. § 11434a. According to the 2016-2017 FAFSA, "homeless means lacking fixed, regular and adequate housing. You may be homeless if you are living in shelters, parks, motels or cars, or temporarily living with other people because you have nowhere else to go. Also, if you are living in any of these situations and fleeing an abusive parent you may be considered homeless even if your parent would provide support and a place to live." Being homeless also includes living in a college dormitory if a student would otherwise be homeless, according to Education guidance.

of being homeless.[13] Students who answer "yes" to this screening question must then indicate whether they have been determined to be an unaccompanied homeless youth by a McKinney-Vento homeless liaison or a director of specific programs sponsored by HUD or HHS who are authorized under the Higher Education Act to verify homelessness for student aid purposes.[14] If these youth answer "yes" to any of these questions, they are deemed independent.[15] Education does not require financial aid administrators to obtain documentation from unaccompanied homeless students to prove their circumstances if they answer yes, unless the college has conflicting information.

Students who do not have determinations of homelessness from these federal programs can still qualify as an unaccompanied homeless youth by contacting a financial aid administrator at each school to which they apply to request an unaccompanied homeless youth determination.[16] Education requires financial aid administrators to determine whether these students are unaccompanied homeless youth and therefore

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[13] For the online FAFSA, unaccompanied homeless youth questions are only presented to applicants who have not been deemed independent by a prior question. For example, students who previously responded that they were married or were veterans would be considered independent and would not see questions about homelessness.

[14] These include directors of HUD-funded emergency shelters or transitional housing programs or directors of runaway or homeless youth programs funded by HHS. 20 U.S.C. § 1087vv(d)(1)(H)(i)-(iii). In addition, financial aid administrators are authorized to verify a student as an unaccompanied homeless youth. 20 U.S.C. § 1087vv(d)(1)(H)(iv). Because Education defines youth as age 21 or under in the FAFSA, unaccompanied homeless youth ages 22 and 23 are not asked these specific follow-up questions in the online FAFSA.

[15] Education guides homeless and other students through the FAFSA, for example by providing online "help text" to explain technical terms and to help students answer questions most appropriate for their situation. About 99 percent of all applicants use the online version of the FAFSA, according to Education data.

[16] Although unaccompanied homeless youth ages 22 and 23 do not meet Education's definition of "youth" in the FAFSA. Education issued guidance in July 2015 instructing financial aid administrators that these students qualify as unaccompanied homeless youth if they otherwise meet the definition. The July guidance on the status of 22- and 23-year old homeless youth was incorporated into Education's September 2015 *Application and Verification Guide*.

considered financially independent for federal student aid purposes.[17] (See fig. 1 for a description of the full process.)

Figure 1: Federal Student Aid Application Process for Unaccompanied Homeless Youth
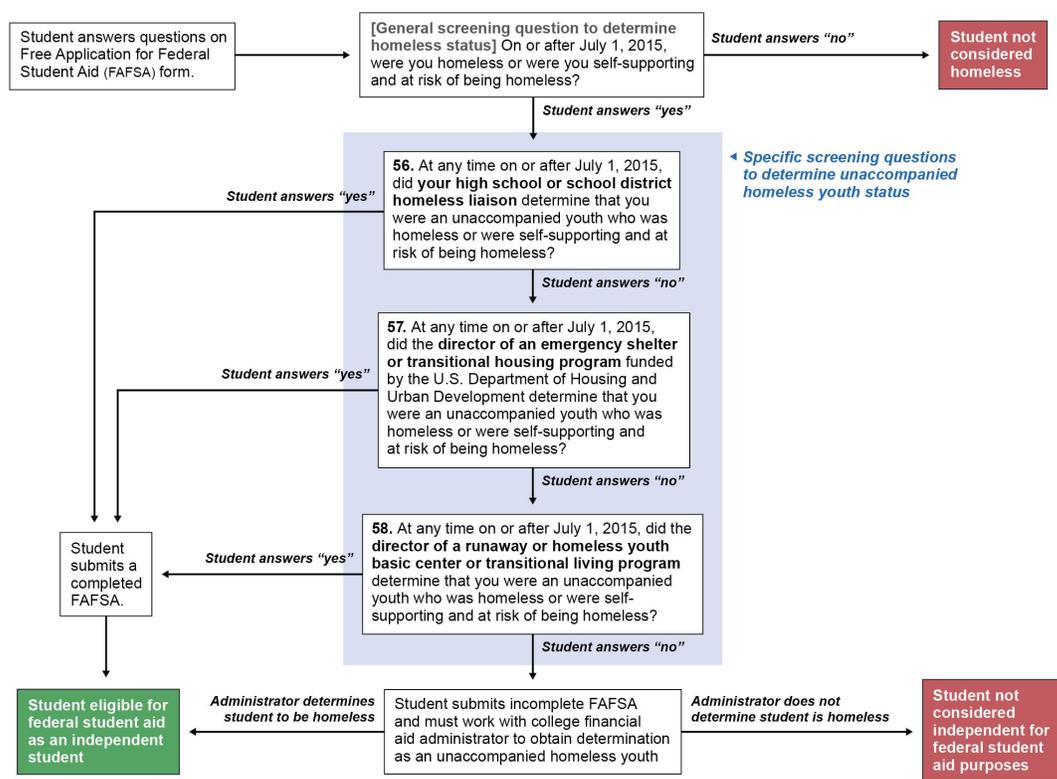
Source: GAO analysis of Education's FAFSA application process. | GAO-16-343

Note: For the online FAFSA, the unaccompanied homeless youth screening questions are only presented to online FAFSA applicants who were not deemed independent by a prior question. For example, students who previously responded that they were married, were veterans, were age 24 or older, were attending a graduate or professional school, or had been in foster care, among other things, would be considered independent and would not see questions about homelessness.

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[17]According to the *Application and Verification Guide,* if a student does not have and cannot obtain documentation from any of the authorities cited on the FAFSA, financial aid administrators must determine if the student is an unaccompanied youth who is homeless or is self-supporting and at risk of being homeless.

HHS Programs to Support Foster and Homeless Youth

HHS provides support services for older foster youth and youth transitioning out of foster care through the John H. Chafee Foster Care Independence Program and the related Chafee Education and Training Voucher Program (Chafee ETV Voucher Program).[18] HHS also provides support services for homeless youth through its Runaway and Homeless Youth Program.

- **The John H. Chafee Foster Care Independence Program:** This program provides funding to states for support services, including employment and educational assistance, to prepare foster youth for adulthood. Foster youth up to age 18 and former foster youth up to age 21 are eligible for this program.[19] The program was funded at about $140 million in fiscal year 2015.

- **Chafee ETV Voucher Program:** Youth who qualify for the Chafee Independence Program are eligible for the Chafee ETV Voucher Program, which authorizes funding to states to help eligible foster youth pay for college.[20] A youth who has aged out of foster care may be eligible for vouchers worth up to $5,000 annually to help pay for college costs. Eligible youth receiving a voucher before they turn 21

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[18]The federal foster care program, authorized by title IV-E of the Social Security Act as amended, helps to provide safe and stable out-of-home care for children who have experienced abuse or neglect until the children are safely returned home, placed permanently with adoptive families or placed in other planned arrangements for permanency. HHS also provides additional support services in states that have extended foster care for youth up to age 21. As provided for by the Fostering Connections to Success and Increasing Adoptions Act of 2008, Pub. L. No 110-351, § 201, 122 Stat. 3949, 3957, codified at 42 U.S.C. § 675, states have the option to seek federal reimbursement for part of the cost of providing foster care to eligible youth until age 19, 20, or 21. As of September 2015, HHS had approved plans for 21 states and Washington, D.C. to extend foster care and services up to age 21.

[19]The program was authorized by the Foster Care Independence Act of 1999, Pub. L. No. 106-169, § 101, 113 Stat. 1822, 1823, codified at 42 U.S.C. § 677.

[20]The Chafee ETV Voucher Program was authorized by the Promoting Safe and Stable Families Amendments of 2001, Pub. L. No. 107-133, § 201(b), 115 Stat. 2413, 2422, codified at 42 U.S.C. § 677(i).

may continue to participate in the program through age 22.[21] The program was funded at about $43 million in fiscal year 2015.

- **Runaway and Homeless Youth/Transitional Living Grant Program:** The Runaway and Homeless Youth Program has several grant programs. The Transitional Living Program provides grants to local entities that provide residential support services to homeless youth ages 16 through 21.[22] Grantees are required to provide homeless youth with safe living accommodations and services to help them prepare for adulthood, including college planning. In fiscal year 2015, the program was funded at about $44 million.[23]

Foster Youth Complete College to a Lesser Extent than Other Students, while Little Is Known about College Outcomes for Homeless Youth

[21]States may allow youth participating in the voucher program on the date they turn 21 to continue to participate in the program until they reach 23 years of age as long as they are enrolled and making satisfactory progress in a postsecondary education or training program. 42 U.S.C. § 677(i)(3). Foster youth are generally eligible for both the Chafee Independence Program and the Chafee ETV Voucher Program if they are expected to age out of foster care without being placed in a permanent family or if they left foster care for a permanent placement after age 16. Receipt of a Chafee ETV voucher does not affect foster youths' eligibility for Pell Grants and other federal aid except that the total amount of educational assistance cannot exceed the total cost of attendance. 42 U.S.C. § 677(i)(5).

[22]The Transitional Living Program—established as an amendment to The Runaway and Homeless Youth Act in 1988—was most recently reauthorized and amended by the Reconnecting Homeless Youth Act of 2008, Pub. L. No. 110-378, § 4, 122 Stat. 4068, 4069, codified at 42 U.S.C. §§ 5714-1 - 5714-2. Under certain circumstances, a 22- or 23-year-old homeless youth can participate in the program. 42 U.S.C. § 5732a(3)(A)(ii).

[23]For fiscal year 2015, Congress appropriated $97 million for the Transitional Living Program together with another shorter term program for runaway and homeless youth. HHS allocated $44 million of these funds to the Transitional Living Program.

One Study Suggests That a Lower Percentage of Foster Youth Attend College and Education Data Show Many Attend Public 2-Year Colleges

Little information is available on the percentage of foster youth who enroll in college. One major three-state study of foster youth in 2011 found a gap in college experience between foster youth and other youth. Specifically, 40 percent of former foster youth in the study reported completing at least 1 year of college, compared to an estimated 68 percent of youth in the general population.[24] According to our analysis of Education administrative data, about 72,000 foster youth received federal student aid in 2013-2014 (less than 1 percent of all undergraduates receiving aid).[25] However, this may be an undercount of foster youth because of how the FAFSA collects information from applicants.[26]

Foster youth who do attend college enrolled at public 2-year colleges to a greater extent than other youth. According to our analysis of Education data, 43 percent of the foster youth who received federal student aid in 2013-2014 attended public 2-year colleges, compared to 29 percent of other undergraduates receiving federal student aid (see fig. 2). Further, based on our analysis of Education's nationally representative National Postsecondary Student Aid Survey (NPSAS) data from 2011-2012, we estimated that foster youth attended public 2-year colleges at higher

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[24]M. Courtney, A. Dworsky, A. Brown, C. Cary, K. Love, & V. Vorhies, *Midwest Evaluation of the Adult Functioning of Former Foster Youth: Outcomes at Age 26* (Chicago, IL: Chapin Hall at the University of Chicago, 2011). See appendix I for more information on this analysis.

[25]These data are from Education's Common Origination and Disbursement System, which contains information on students who receive federal student aid. Data on foster youth come from the "foster care, ward of the court, or orphaned" question on the FAFSA. For FAFSA purposes, a student who was in foster care at any time after they turned age 13 is considered a foster youth. In our report, foster youth refers to both current and former foster youth. Based on data from Education's nationally representative National Postsecondary Student Aid Survey, we developed an estimate of the total number of foster youth enrolled in college, including those who did not receive federal student aid. For the 2011-2012 school year, NPSAS estimates that approximately 286,000 foster youth (about 1 percent of all students) were enrolled in college as undergraduates nationwide. The data on foster youth from NPSAS and the Common Origination and Disbursement system vary due to differences in the data sources, such as the specific student population and timeframes. For more information on our NPSAS analyses, see appendixes I and II.

[26]Data on foster youth based on FAFSA responses may represent an undercount of foster youth because of how the FAFSA screens applicants to determine whether they are dependent or independent students. Students who are considered financially independent because they are 24 years of age or older, serve or served in the military, or are married, among other things, do not answer the FAFSA questions about whether they were in foster care.

percentages (estimated 49 percent) than other low-income youth (41 percent).[27] Two studies we reviewed also found that a high percentage of college-enrolled foster youth attended 2-year colleges.[28]

Figure 2: Types of Colleges Attended by Foster Youth and All Other Undergraduates, Free Application for Federal Student Aid Award Year, 2013-2014

Foster youth receiving federal student aid

Non-profit
12%
For-profit **15%**
Public **73%**

Within the 73% attending public colleges

2-year college **43%**
4-year college **30%**
Less than 2-year college **<1%**

All other students receiving federal student aid

Non-profit **17%**
For-profit **18%**
Public **65%**

Within the 65% attending public colleges

2-year college **29%**
4-year college **36%**
Less than 2-year college **<1%**
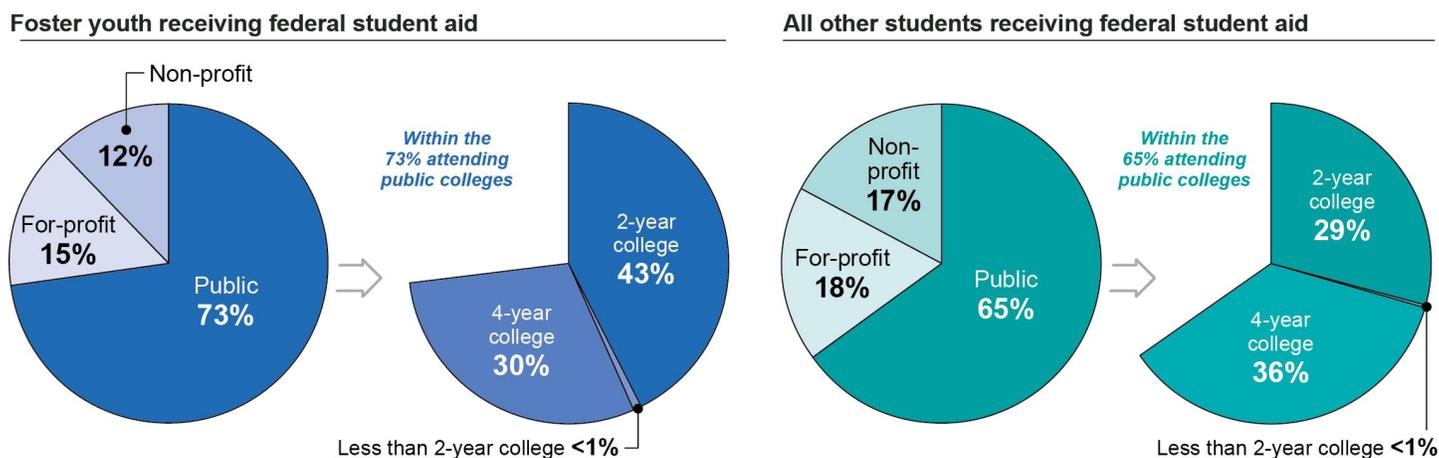
Source: GAO analysis of Common Origination and Disbursement System data. | GAO-16-343

Notes: Figures and subtotals may not add to 100 due to rounding. The non-profit category refers to private non-profit colleges. Data on 2-year colleges also include some certificate programs that are up to 3 years in length.

Consistent with attending 2-year colleges, foster youth who enrolled in college also pursued an associate's degree to a greater extent than other students. Specifically, an estimated 53 percent of foster youth enrolled in college in 2011-2012 pursued an associate's degree compared to 48

[27]All foster youth comparisons from NPSAS are statistically significant at the 95 percent confidence level unless otherwise indicated. NPSAS collects data on a large, nationally representative sample of students and colleges to examine how students and their families pay for college. Data on foster youth comes from the "foster, orphan, and ward of the court" question on the FAFSA. We use low-income students as a comparison group for our analyses of NPSAS data because most foster and homeless youth have incomes within the lowest income quartile of all college-enrolled youth. We defined "low-income" as students in the lowest income quartile for our analyses. All estimates have margins of error within plus or minus 10 percentage points, unless otherwise noted.

[28]Courtney, et al., *Midwest Evaluation*; J. Merdinger, A. Hines, K. Osterling, & P. Wyatt, "Pathways to College for Former Foster Youth: Understanding Factors That Contribute to Educational Success," *Child Welfare*, vol. 84, no. 6 (2005).

percent of low-income students, according to our analysis of NPSAS data. Conversely, foster youth pursued a bachelor's degree to a lesser extent than all other students.[29] For example, about 48 percent of all other students enrolled in bachelor's degree programs, compared to 38 percent of foster youth (see fig. 3).[30]

Figure 3: Comparison of Enrollment of Foster Youth and Other Students in College Degree Programs, by Estimated Percent of Students Enrolled, School Year 2011-2012

Less than Bachelor's degree ◄ ► Bachelor's degree

	Certificate	Associate's degree	Less than Bachelor total	Bachelor's degree
Foster youth	10	53	63	38
Low-income students	11[a]	48	59	41[a]
All other students	8[a]	44	52	48

Percentage of students

Legend:
- Certificate
- Associate's degree
- Bachelor's degree

Source: GAO analysis of 2011-2012 National Postsecondary Student Aid Survey data. | GAO-16-343

[a]Percentage estimate is not statistically different from the foster youth estimate at the 95 percent confidence level.

Notes: Percentages may not add to 100 due to rounding. All foster youth comparisons are statistically significant at the 95 percent confidence level, unless otherwise indicated. The percentage estimates for all populations have margins of error of within plus or minus 10 percentage points. We compared foster youth to low-income students because most foster youth have incomes within the lowest income quartile of all college-enrolled youth. The "all other students" category includes all students who are not foster youth, regardless of income level.

[29]The difference between foster youth and low-income youth enrolled in bachelor's degree programs was not statistically significant at the 95 percent confidence level, according to our NPSAS analysis.

[30]We also used dependent students as a comparison group because they are similar in age (under 24) to foster and homeless youth. These results were largely similar to the comparisons of foster youth with low-income youth and all other youth (see app. II).

A Lower Percentage of Foster Youth Graduate from College Compared to Other Low-Income Students

Available data suggest that a smaller percentage of foster youth who begin college ultimately finish with a degree compared to other students. According to our analysis of Education's Beginning Postsecondary Students (BPS) data, a smaller percentage of foster youth who began college for the first time in the 2003-2004 school year (an estimated 14 percent) graduated with a bachelor's degree as of June 2009—the latest data available at the time of our analysis—than all other students (31 percent).[31] Further, BPS data indicate that a high percentage of foster youth who enroll in college do not earn a degree compared to other low-income students. Specifically, 72 percent of foster youth had no degree or certificate within 6 years of first enrolling in college—a far greater percentage than for low-income students (57 percent), as well as for all other students (49 percent) (see fig. 4).[32]

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[31]BPS surveys a sample of first-time students at three points in time: at the end of their first year, and then 3 and 6 years after first starting college. It collects data on a variety of topics, including student demographic characteristics, school and work experiences, persistence, transfer, and degree attainment. BPS draws its initial cohorts from the NPSAS data set. We analyzed BPS data for the student cohort that began college in 2003-2004, and compared foster youth to other low-income students and all other students. We also compared foster youth to dependent students because they are similar in age (under 24) to foster and homeless youth. These results were largely similar to the comparisons with low-income youth and all other youth (see app. II). All foster youth comparisons from BPS are statistically significant at the 95 percent confidence level, unless otherwise indicated.

[32]Some smaller studies involving a few states or schools also indicate that a relatively low percentage of foster youth graduate from college. For example, a study of adults who had been in foster care in the Pacific Northwest found that 43 percent of foster youth who participated in the study received some education beyond high school, but only 2 percent completed a bachelor's degree or higher. P. Pecora, R. Kessler, K. O'Brien, C. Roller White, J. Williams, M. Herrick, "Educational and Employment Outcomes of Adults Formerly Placed in Foster Care: Results from the Northwest Foster Care Alumni Study," *Children and Youth Services Review*, vol. 28 (2006).

Figure 4: Comparison of Estimated College Degree Completion Rates within 6 Years of First Enrollment, for Foster Youth and Other Students, as of 2009

No degree ◄ ► Certificate or higher

Foster youth: 72 | 15 | 14 | 29

Low-income students: 57 | 22[a] | 21[a] | 43

All other students: 49 | 20[a] | 31 | 51

Percentage of students

Certificate or Associate's degree
Bachelor's degree

Source: GAO analysis of 2008-2009 Beginning Postsecondary Students Longitudinal Study data. | GAO-16-343

[a]Percentage estimate is not statistically different from the foster youth estimate at the 95 percent confidence level.

Notes: Percentages may not add to 100 due to rounding. All foster youth comparisons are statistically significant at the 95 percent confidence level, unless otherwise indicated. All estimates have margins of error of within plus or minus 10 percentage points, with the exception of the foster youth estimates: The confidence intervals for these estimates are: 58 to 82 percent for no degree, 7 to 26 percent for certificate or associate's degree, and 6 to 25 percent for bachelor's degree. We compared foster youth to low-income students because most foster youth have incomes within the lowest income quartile of all college-enrolled youth. The "all other students" category includes all students who are not foster youth, regardless of income level.

GAO-16-343 College Outcomes for Homeless and Foster Youth

Unaccompanied Homeless Youth Have College Enrollment Patterns Similar to Foster Youth but Little Is Known about Completion

Unaccompanied homeless youth have college enrollment patterns similar to those of foster youth, but the percentage of all homeless youth who enroll in college is not generally known, partly due to definitional and other issues that make it difficult to count these youth.[33] According to our analysis of Education administrative data, about 15,000 unaccompanied homeless youth received federal student aid in the FAFSA award year 2013-2014 (less than 1 percent of all undergraduates receiving aid).[34] Again, this number may represent an undercount because of how FAFSA collects information.[35]

Like foster youth, unaccompanied homeless youth enrolled at public 2-year colleges to a greater extent than other students. Specifically, Education's administrative data show that 46 percent of homeless students who received federal student aid in 2013-2014 attended public

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[33]GAO, *Homelessness: A Common Vocabulary Could Help Agencies Collaborate and Collect More Consistent Data,* GAO-10-702 (Washington, D.C.: June 30, 2010) and GAO, *Education of Homeless Students: Improved Program Oversight Needed,* GAO-14-465 (Washington, D.C.: July 31, 2014).

[34]Data on homeless youth are for students who are unaccompanied homeless youth and are considered independent for federal student aid purposes. In analyzing college outcomes for homeless youth, we focused on unaccompanied homeless youth (those who are not in the physical custody of their parents or guardians) rather than all homeless youth because data are available only for unaccompanied homeless youth. Administrative data cited are from Education's Common Origination and Disbursement System, which contains information on students who receive federal student aid. Further, our analysis of NPSAS data showed that about 21,000 of the approximately 23 million students enrolled in college during the 2011-2012 school year were unaccompanied homeless youth (less than 1 percent of all college students). The data on homeless youth from NPSAS and the Common Origination and Disbursement system vary due to differences in the data sources, such as the specific student population and timeframes.

[35]Data on unaccompanied homeless youth based on FAFSA responses may represent an undercount of homeless youth because of how FAFSA screens applicants to determine whether they are dependent or independent students. Students who are considered independent because they are 24 years of age or older, served in the military, or are married, among other things, do not answer the FAFSA questions about whether they are unaccompanied homeless youth.

2-year schools, compared to 30 percent of all other undergraduates receiving federal student aid (see fig. 5).[36]

Figure 5: Types of Colleges Attended by Unaccompanied Homeless Youth and All Other Undergraduates, Free Application for Federal Student Aid Award Year, 2013-2014

Unaccompanied homeless youth receiving federal student aid

For-profit

Non-profit **14%**

7%

Public **79%**

Within the 79% attending public colleges

2-year college **46%**

4-year college **32%**

Less than 2-year college **<1%**

All other students receiving federal student aid

Non-profit **17%**

For-profit **18%**

Public **65%**

Within the 65% attending public colleges

2-year college **30%**

4-year college **36%**

Less than 2-year college **<1%**
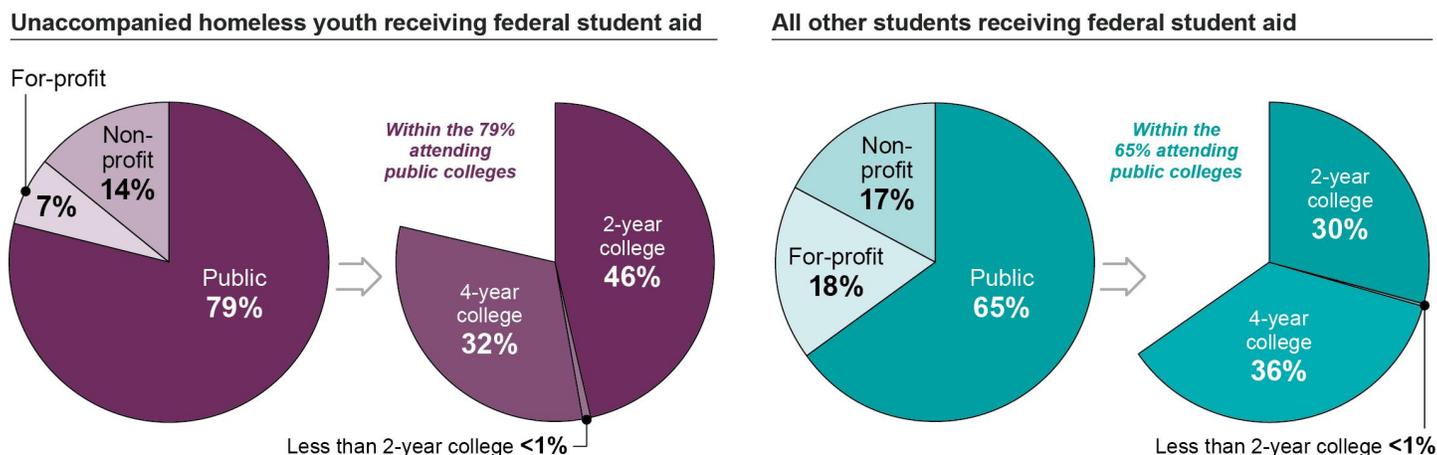
Source: GAO analysis of Common Origination and Disbursement System data. | GAO-16-343

Notes: Figures and subtotals may not add to 100 due to rounding. The non-profit category refers to private non-profit colleges. Data on 2-year colleges also include some certificate programs that are up to 3 years in length.

Like foster youth, unaccompanied homeless youth enrolled in college also pursued an associate's degree to a greater extent than other students. Specifically, an estimated 59 percent of unaccompanied homeless youth enrolled in 2011-2012 pursued an associate's degree program compared to 44 percent of all other students, according to our analysis of NPSAS data.[37] Conversely, unaccompanied homeless youth enrolled in a

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[36]All unaccompanied homeless youth comparisons from NPSAS are statistically significant at the 95 percent confidence level unless otherwise indicated. While our analysis of NPSAS data also indicated that a higher percentage of unaccompanied homeless students attended public, two-year colleges than other students, in this instance, the results of this additional analysis were not statistically significant. The small sample size for unaccompanied homeless youth in the NPSAS data may not be sufficient for detecting statistical significance.

[37]We compared unaccompanied homeless youth to other low-income students and all other students for our NPSAS analyses. We compared low-income students and unaccompanied homeless youth because most unaccompanied homeless youth have incomes within the lowest income quartile of all college-enrolled youth.

bachelor's degree program to a lesser extent than all other students (see fig. 6).[38]

Figure 6: Comparison of Degree Program Enrollment for Unaccompanied Homeless Youth and Other Students, By Estimated Percent Enrolled, School Year 2011-2012

Less than Bachelor's degree ◄ ► Bachelor's degree

Category	Certificate	Associate's degree	Bachelor's degree
Unaccompanied homeless youth (68)	9	59	32
Low-income students (59)	11[a]	48[a]	41[a]
All other students (52)	8[a]	44	48

Percentage of students

Legend:
- Certificate
- Associate's degree
- Bachelor's degree
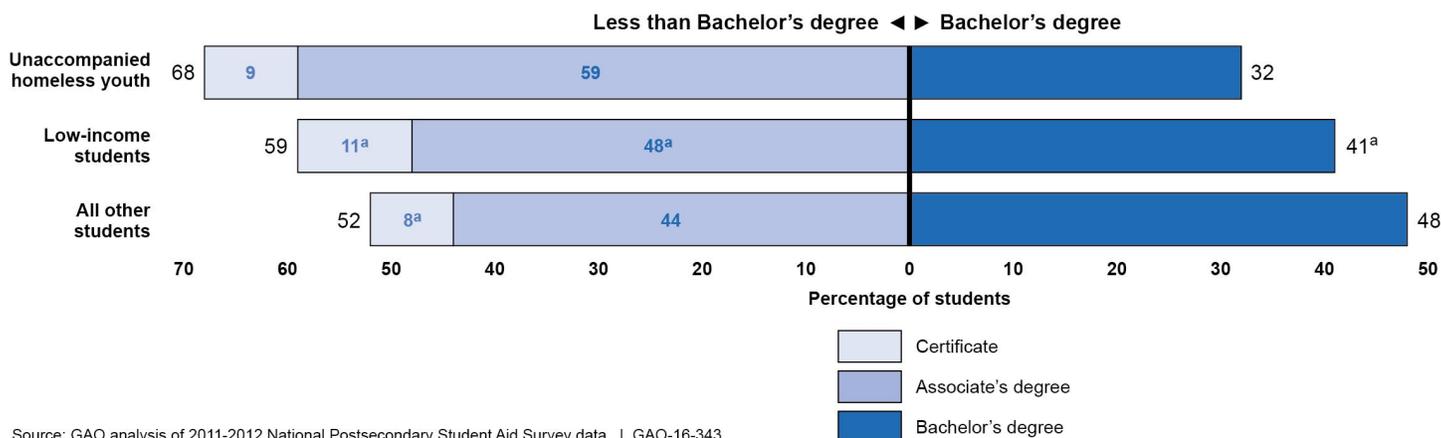
Source: GAO analysis of 2011-2012 National Postsecondary Student Aid Survey data. | GAO-16-343

[a]Percentage estimate is not statistically different from the unaccompanied homeless youth estimate at the 95 percent confidence level.

Notes: All unaccompanied homeless youth comparisons are statistically significant at the 95 percent confidence level, unless otherwise indicated. All estimates have margins of error of within plus or minus 10 percentage points, with the exception of the unaccompanied homeless youth estimates for associate's and bachelor's degrees: The confidence intervals for these estimates are 45 to 72 percent for associate's degree and 20 to 47 percent for bachelor's degree. We compared unaccompanied homeless youth to low-income students because most unaccompanied homeless youth have incomes within the lowest income quartile of all college-enrolled youth. The "all other students" category includes all students who are not unaccompanied homeless youth, regardless of income level.

While some information is available on the college enrollment patterns of unaccompanied homeless youth, little is known about their completion rates. Our literature review found no rigorous studies on the college graduation rates of homeless youth. In our past work, we found that information on homeless youth can be limited because of data collection challenges such as the stigma associated with homelessness and the existence of multiple federal definitions of homelessness.[39] An official at a

[38]We also compared unaccompanied homeless youth to dependent students because they are similar in age (under 24) to foster and homeless youth. The results were largely similar to the comparisons with low-income youth and all other youth (see app. II).

[39]GAO-14-465 and GAO-10-702.

national homeless organization said that she was not aware of any colleges or universities that were tracking graduation rates for unaccompanied homeless youth. Further, federal data on college completion for homeless youth are limited because Education did not collect information on homeless youth for either the NPSAS or BPS data sets prior to 2011-2012. However, more should be known about graduation rates for unaccompanied homeless youth in upcoming years. In 2011-2012, Education included a question to identify homeless youth for the first time in the BPS. Starting in 2017, when Education will have 6 years of data on homeless youth attending college, it will be possible to begin assessing college completion rates for unaccompanied homeless youth.[40]

Limited Academic Preparation, Family Support, and Awareness of Resources Make It Harder for Homeless and Foster Youth to Pursue College

From elementary school through high school, many homeless and foster youth face common challenges that can leave them unprepared and ill-equipped for college, according to stakeholders we interviewed and studies and reports we reviewed (see table 1 for a summary of these challenges). Many homeless and foster youth have weak academic foundations for college because of their frequent moves from school to school. They also typically have few supportive family members or other adults they can turn to for help and advice about how to apply for, enroll, and stay in college. Lastly, because they typically have low incomes, their financial resources for college are limited. These challenges can also be exacerbated by the extent to which homeless and foster youth lack awareness about federal financial resources that are available to help them pursue a college education.

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[40]The current student cohort for the BPS began college in 2012, was surveyed in 2014, and will be contacted again in 2017.

Table 1: Key College Challenges for Homeless and Foster Youth

Common characteristics of homeless and foster youth	Effect on college enrollment	Effect on college persistence and attainment
Academic preparation Frequent school changes lead to lower academic performance Take few or no college preparation courses	Difficulty meeting college admissions requirements	Unprepared for college-level courses (stuck in remedial classes)
Family supports Lack strong family support systems or other adult mentors Less access to high school counselors and college advisors	Difficulty navigating complex college application and financial aid processes	Lack emotional support Lack adult mentors
Financial Predominately from low-income backgrounds	Financial aid does not fully cover students' needs	Trouble balancing financial obligations of school and life Lack of stable housing

Source: GAO analysis of challenges and effects based on stakeholder views and reports and studies we reviewed. | GAO-16-343

Weak Academic Foundations Can Hinder College Progress and Success

While many homeless and foster youth deal with academic issues associated with other low-income and disadvantaged students, these youth can experience additional academic and other challenges that can hinder their ability to attend and succeed in college. For many homeless and foster youth, their early academic development is often disrupted by frequent changes in living arrangements and subsequent transitions into different schools. As we have previously reported, research suggests that student mobility has a negative effect on students' academic achievement.[41] Specifically, research has found that students who changed schools more frequently than other students tended to have lower scores on standardized reading and math tests and drop out of school at higher rates than their less mobile peers. Many homeless and foster youth change schools multiple times, according to officials from foster care and homelessness organizations we interviewed. A study we reviewed of more than 650 former foster youth indicated that 65 percent had changed schools seven or more times from elementary through high

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[41]GAO, *K-12 Education: Many Challenges Arise in Educating Students Who Change Schools Frequently*, GAO-11-40 (Washington, D.C.: Nov 18, 2010).

school.[42] Similarly, a homeless youth in one of our discussion groups said she and her family had lived out of a car in 11 different states, and she often spent just a few weeks or months at each new school. Frequent school changes can be disruptive for students' academic progress because they must adjust to new curriculums, classmates, and teachers.

The lack of sufficient academic preparation can make it difficult for some homeless and foster youth to qualify for college enrollment. College admission standards generally require students to have completed a high school degree or a recognized equivalent; however, homeless and foster youth generally have lower rates of high school completion than their peers, according to federal officials and studies we reviewed. For example, Education officials told us that available data from states indicate that a lower percentage of homeless students graduate from high school compared to non-homeless students. Foster and homeless youth also tend to be absent from classes more than other students, which impedes their academic progress.[43] In addition, homeless and foster youth who do graduate from high school may not have sufficient grades or may not have taken the necessary college preparatory courses to meet college admissions standards. For example, a homeless youth in one of our discussion groups said her high school grade point average was not high enough to be accepted into college. Similarly, many homeless youth acquire a General Education Development (GED) credential rather than a high school diploma, which HHS officials said can make it more difficult to get into college.

Weak academic foundations can continue to hinder these students when they are enrolled in college. Many homeless and foster youth are not sufficiently prepared for college-level classes, so they must enroll in remedial education courses during their first year in college, according to federal and state officials we interviewed. A foster youth in one of our discussion groups said she was not academically prepared for college so she had to take remedial English and other summer classes to catch up. As we have previously reported, students in remedial education have

[42]P.J. Pecora, et al., "Results from the Northwest Foster Care Alumni Study."

[43]Thomas R. Wolanin, *Higher Education Opportunities for Foster Youth: A Primer for Policy Makers*, The Institute for Higher Education Policy (Washington, D.C.: December 2005), and National Center for Homeless Education, *Best Practices in Homeless Education: Increasing Access to Higher Education for Unaccompanied Homeless Youth: Information for Colleges and Universities* (Washington, D.C.).

relatively low chances of completing their degrees or certificates within 8 years.[44] Education officials also said these students are using portions of their available student aid on remedial classes, which do not count toward a degree.[45] The cumulative effect of these academic challenges can make it more difficult for homeless and foster youth to achieve successful college outcomes.

Limited Family Support Can Make It Difficult to Enroll in and Succeed in College

Without the support of family members or mentors, homeless youth and youth in foster care may lack the impetus to pursue college or the knowledge to navigate the complex enrollment process. Homeless and foster youth may be less inclined to think of college as a viable option when they do not have relationships with supportive adults to convey the value of education or provide models of academic success, according to several reports and a homeless organization we interviewed.[46] A college financial aid administrator we interviewed told us that lack of encouragement and support from a caring adult and the generally low expectations of homeless and foster youth keep these students from applying to college. In addition, homeless and foster youth often lack the support of knowledgeable adults to help guide them through the complex processes of applying to and selecting a college, according to several officials from foster care and homelessness organizations we interviewed. As a result, homeless and foster youth who are interested in going to college often do not know how to start the process and lack information on different types of colleges and programs, according to federal and state officials we interviewed, as well as officials from foster care and homelessness organizations. For example, a representative for college admission counselors explained that it can be extremely challenging for homeless and foster youth to complete the numerous college admission requirements on their own, such as signing up for college admissions tests and completing the FAFSA.

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[44]GAO, *Community Colleges: New Federal Research Center May Enhance Current Understanding of Developmental Education,* GAO-13-656 (Washington, D.C.: September 2013).

[45]Students are eligible to receive Pell Grants for up to 12 semesters.

[46]Wolanin, *Higher Education Opportunities for Foster Youth: A Primer for Policy Makers;* A. Dworsky and A. Pérez, *Helping former foster youth graduate from college: Campus support programs in California and Washington State.* (Chicago: Chapin Hall at the University of Chicago, 2009).

Although many foster and homeless youth can turn to certain professionals to help them with college applications and planning, these professionals may not have the time or knowledge to provide the full extent of college guidance that some homeless and foster youth need, according to relevant reports we reviewed and interviews with officials from higher education organizations. High school counselors are often tasked with many responsibilities in addition to college counseling, and also have high caseloads, especially those who serve low-income students.[47] McKinney-Vento homeless liaisons in particular are often more focused on helping homeless students with fundamental needs, such as obtaining food and shelter and staying in high school, rather than helping them apply to college, according to Education officials and federal researchers we interviewed. Similarly, child welfare caseworkers are often more focused on helping foster youth transition to independence as they age out of the foster care system, according to foster care experts we interviewed.

Further, according to federal and other officials, some of these professionals are not fully aware of federal student aid or college application processes because these are not their areas of expertise. Yet child welfare systems are required to help youth aging out of foster care prepare to transition to adulthood, and this transition means going to college for many young people.[48] Similarly, under the McKinney-Vento Homeless Assistance Act, school districts are required to coordinate with social services agencies and other programs to help meet homeless

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[47]School counselors' responsibilities also include administrative duties (monitoring special education compliance), academic counseling (ensuring students are taking the right courses, counseling struggling students), and even social work (addressing student discipline and mental health issues). According to the National Association of College Admission Counseling, public high school counselors spend only about a quarter of their time on college admission counseling. M. Clindinst, et al., *State of College Admission 2012:* National Association of College Admission Counseling. Further, although the American School Counselors Association recommends a student-to-counselor ratio of 250:1, the ratio for counselors serving low-income students averages 1,000:1, according to a survey by the National Association of College Admission Counseling.

[48]State child welfare agencies are required to help youth aging out of foster care to develop a transition plan that must be implemented during a 90-day period prior to a youth's 18th birthday (or up to a youth's 21st birthday in states that offer extended foster care). The plan is to be directed by the youth and must include specific options on education, housing, and other matters. 42 U.S.C. § 675(5)(H).

students' academic and other needs.[49] Under the most recent change to the law, McKinney-Vento homeless liaisons are responsible for informing unaccompanied homeless youth that they may obtain help from them to verify their status as an unaccompanied homeless youth.[50]

These professionals from different fields are important resources for homeless and foster youth, who often lack any family support to help them navigate the college application and financial aid processes. However, these professionals work in different, complex systems with competing priorities, and the primary purpose of these systems is not to facilitate college planning and admissions. Further, these professionals have multiple responsibilities that make it challenging to provide this type of assistance. These systems may be able to take steps to more effectively encourage and enable these professionals to provide more active college planning. Given the complexities of these different systems, any effort to do so would need to carefully consider current workloads, responsibilities, and training needs of these professionals, as well as program goals, priorities, and incentives. Education and HHS are responsible for administering the McKinney-Vento program and child welfare programs, and as such would be well positioned to consider available options for encouraging college planning efforts among professionals in these programs who work with homeless and foster youth. Officials from Education and HHS agreed that it would be helpful to explore such options. Without additional support from professionals they encounter in school or through the child welfare system, homeless and foster youth may not receive the assistance they need to attend college and may struggle to establish independent, productive lives.

The lack of emotional support from caring adults can also make it more difficult for homeless and foster youth to be successful once enrolled in college. Youth in our discussion groups and officials from national organizations that work with homeless youth discussed how homeless and foster youth often feel alone and isolated on campus. For example, an official from an organization involved with homelessness issues shared a story of a homeless youth who felt depressed on college move-

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[49]42 U.S.C. § 11432(g)(5). Also, under the GPRA Modernization Act of 2010, federal agencies should collaborate on similar goals. Pub. L. No. 111-352, 124 Stat. 3866 (2011).

[50]Pub. L. No. 114-95, § 9102(5), 129 Stat. 1802, 2126 (2015), codified at 42 U.S.C. § 11432(g)(6)(A)(x)(III).

in day when her classmates brought personal belongings in U-Hauls and had parents helping them, but she had only two suitcases and had to move in by herself. A homeless youth in one of our discussion groups said she continued to face difficulties after she enrolled in college because she did not have anyone to provide emotional support or help validate that she was making the right decisions. Homeless students in both of our discussion groups said either that they had mentors who proved critical to their success at school or that they wished they had a mentor. To help such students, colleges in nine states have instituted Single Points of Contact (known as SPOCs) to offer guidance and counseling services to vulnerable populations such as homeless and foster youth, according to a national homelessness organization. The SPOC is a supportive college administrator who helps these youth address barriers by providing referrals to admissions, financial aid, and academic advising staff. A national homelessness organization is working to establish SPOCs at colleges in other states. Similarly, Virginia higher education officials told us the state has established coaches and case management support programs for foster youth at 18 of its community colleges.

Financial Challenges Can Be Exacerbated by Limited Awareness of Available Federal Resources

The vast majority of homeless and foster youth come from low-income backgrounds with limited access to financial supports. Foster youth are much more likely than their peers to be poor before, during, and after they are in foster care, and the lack of a stable income is common among homeless families, according to some studies.[51] Among college-enrolled foster youth, an estimated 95 percent had annual incomes of less than $25,000, along with 100 percent of college-enrolled homeless youth, according to our analysis of NPSAS data for 2011-2012.[52]

These financial challenges can create numerous obstacles to college enrollment for homeless and foster youth. The upfront cost of college entrance exams, transcripts, and application fees creates an immediate barrier that may deter some homeless and foster youth from considering

[51]For example, see Peter J. Pecora, et al., *Improving Foster Family Care: Findings from the Northwest Foster Care Alumni Study,* Casey Family Programs (Seattle, WA: 2005).

[52]These data are based on students who self-identify as having been in foster care or as unaccompanied homeless youth on the FAFSA and who would therefore be considered financially independent.

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college as an option, according to experts and students with whom we spoke. For example, one homeless youth said it was challenging on a limited budget to cover the cost of college application fees, some of which are as much as $150. Eligible youth can apply to obtain fee waivers for college entrance exams and application fees, although the extent to which students are aware of these waivers likely varies.[53] The financial challenges often persist after these students are accepted into schools because available federal grants are rarely sufficient to fully cover their tuition and living expenses.[54] In some cases, homeless and foster youth take out federal or private student loans to pay for college. A homeless youth in one of our discussion groups said her school provided some financial aid but she had to take out an additional $12,000 in loans her first year of college to cover expenses.

This financial stress can affect the ability of homeless and foster youth to complete college. In one three-state study, the need to work was the most common reason given by foster youth for why they dropped out of college.[55] While many students work during college, foster youth in our discussion groups also described having to work one or more jobs, often to the detriment of their classes. For example, one former foster youth told us she worked up to 60 hours a week to support herself while attending college part-time.[56] A particular financial concern for homeless and foster youth is finding affordable housing while in college, according

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[53]For example, homeless youth automatically qualify for the College Board's college application waiver. Some colleges also establish their own individual waiver policies.

[54]According to our analysis of NPSAS data, although college-enrolled foster youth received an estimated average of $7,175 in total federal grants and loans in 2011-12, they still needed to cover an estimated average of $8,099 in expenses out-of-pocket after all their financial aid was accounted for that year. According to the College Board, the average cost of tuition, fees, room and board at a public 4-year college for the 2014-15 school year was $18,943. College Board (2015). *Trends in higher education: Tuition and fees and room and board over time.* Retrieved from http://trends.collegeboard.org/college-pricing/figures-tables/tuition-fees-room-board-time

[55]Courtney, et al., *Midwest Evaluation*.

[56]The lack of a family safety net can be compounded for unaccompanied homeless youth, who worked full-time while in school to a greater extent than low-income students, according to our analysis of 2011-2012 NPSAS data. For example, about 32 percent of homeless youth were working full-time while enrolled in college, compared to 17 percent of low-income youth. The difference between unaccompanied homeless youth and all other youth working full-time while in college was not statistically significant, according to our NPSAS analysis.

to multiple experts and federal officials we interviewed. Students in our discussion groups talked about the stress of finding and affording stable housing, and a student in one discussion group expressed fear over becoming homeless again. Homeless and foster youth can face particular difficulty securing housing during school holidays and summer breaks when campus dorms are often closed, according to federal and other officials. According to a national homelessness organization, homeless students often focus on finding summer housing in May instead of concentrating on studying for final examinations.

Despite their financial and housing needs and without knowledgeable adults in their lives, many homeless and foster youth are not aware of federal programs that could help them, such as Pell Grants and Chafee ETV vouchers, according to federal officials and other stakeholders. Some research suggests that low-income and first-generation students—which may include many homeless and foster youth—lack general knowledge about how financial aid works and often do not realize that financial aid, including need-based aid, is available. For example, lower income respondents in a survey of prospective and recently-enrolled students reported less familiarity with Pell Grants than with scholarships from colleges or loans.[57] In addition, former foster youth in one of our discussion groups told us they were initially unaware that they were eligible for Chafee ETV vouchers. One of these students did not receive a Chafee ETV voucher until her junior year of college because she and administrators at her college were unfamiliar with the program.

Because they are commonly on their own, many homeless and foster youth must generally independently identify potential sources of funding or other financial support provided by government and other entities. While specialized resources are available for homeless and foster youth, such as Chafee ETV vouchers, test fee waivers, waivers for college application fees, and state tuition waivers for foster youth, there is no centralized federal online location for these youth to learn about existing resources.[58] While homeless or foster youth may not have access to the

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[57]Rachel Fishman, *2015 College Decisions Survey Part III, Familiarity with Financial Aid,* New America Foundation, August 2015, and unpublished data obtained from the author. This survey was based on a nonprobability sample of prospective and recently enrolled students who were participants in an online respondent panel that was designed to be representative of the general population.

[58]At least 22 states have passed tuition waivers to help former foster youth attend college, according to an organization knowledgeable about foster youth issues.

Internet where they live, they may have other ways to access online information, such as public library computers or cellphones. For example, students in two discussion groups told us that they were able to access the Internet at their school libraries during lunch hours, and one of them said Internet access was not an issue because everyone had a device.

Although Education provides federal student aid information on its website, little information on financial aid and college planning is readily available or tailored for homeless and foster youth. Education is required under the Higher Education Act to provide students and their families with information to help them make informed college decisions, including information about aid available from Education and other federal departments.[59] Further, Education is required to continue to improve the usefulness and accessibility of the information provided on college planning and student financial aid.[60] Education provides webpages with specialized information for certain types of students, including those with criminal convictions, intellectual disabilities, or parents killed in Iraq and Afghanistan. Education does have a webpage about foster youth that offers limited information about financial resources, but that information is generally not directed towards foster youth and is difficult to find. For example, Education's webpage about foster youth is largely targeted to policymakers and practitioners, such as financial aid administrators or grant applicants, and contains relatively little information to help foster youth seeking to enroll in college. It provides legal and technical information mostly about foster youth in elementary and secondary school. The webpage does contain a link to an easily understandable document on Chafee ETV vouchers explaining who is eligible, how they can apply, and how much funding they could receive. However, the other items related to college include a technical explanation of dependent versus independent students and a Dear Colleague Letter directed at college officials about how to treat foster care payments made directly to older youth. Finally, the webpage is not easy to find from the main

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[59] 20 U.S.C. § 1015(b), (d) and (g).

[60] 20 U.S.C. § 1015(e)(1).

Education webpage for students looking for college information: we were unable to locate the webpage without searching the website.[61]

Similarly, Education had little information for unaccompanied homeless youth until recently on its federal student aid website other than the FAFSA instructions for filling out the questions for unaccompanied homeless youth. During the course of our work, an Education official responsible for homeless issues for elementary and high school students said Education was planning a webpage about homeless students that would include some college information, but did not know when it would be finalized or what kind of college information would be included. In its technical comments, Education noted that it had just launched a new webpage that consolidates information on its resources for homeless children and youth from pre-kindergarten through higher education. While this new webpage provides important information on independent student status and federal resources for unaccompanied homeless youth, the webpage is directed to the public and practitioners, such as McKinney-Vento liaisons, not homeless students seeking to enroll in college. Furthermore, the page is not easily accessible and students need to click on multiple indirect links about the agency and its initiatives to find it. In addition, Education said that it was working to complete a factsheet for unaccompanied homeless youth that will consolidate resources from several places. In developing this factsheet, it will be important for Education to include easy-to-understand information that is relevant to unaccompanied homeless youth and post it in a place easy for students to find.

Tailoring financial aid information to unaccompanied homeless youth and foster youth would continue to improve the usefulness and accessibility of the information provided on college planning and student financial aid, as required under the Higher Education Act. While Education is developing more online information, the relative lack of readily available information about college resources directed towards homeless and foster youth makes it difficult for these highly vulnerable youth with limited adult

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[61] In addition, when foster youth report on the online FAFSA that they are or have been in foster care, the FAFSA online confirmation page provides a link to an HHS webpage. However, that information is not prominently displayed on the confirmation page. Further, the college-related information on the HHS webpage is not readily apparent—in addition to providing links to state coordinators for Chafee ETV vouchers, it lists a broad range of child welfare resources, such as hotlines, adoption information, and complaint offices that are unrelated to potential college applicants.

support to learn about programs to help them attend college. It also makes it difficult for professionals, such as child welfare caseworkers, who may be trying to help these youth but who lack the expertise to do so effectively without further information. As a result, foster and homeless youth, or the professionals who assist them, cannot easily locate clear information on available resources and may miss opportunities to obtain financial assistance for which they are eligible and which they need to successfully complete college.

Burdensome Program Rules Can Hinder the Ability of Homeless and Foster Youth to Access Federal Supports

Extensive Documentation Requests Can Impede Access to Aid for Homeless Youth

When unaccompanied homeless youth cannot obtain verification of their status from the specific federal program officials cited on the FAFSA, they must rely on financial aid administrators at individual colleges to determine if they are unaccompanied and homeless and therefore meet the definition of an independent student.[62] However, according to officials from organizations that work with homeless youth and homeless youth in our discussion groups, financial aid administrators have been reluctant to make these determinations without burdensome documentation requests. If a student does not have a homeless youth determination from one of the officials cited on the FAFSA, Education requires a financial aid administrator to evaluate the student's situation and determine if the student qualifies as an unaccompanied homeless youth.[63] According to

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[62]In discussing the barriers that homeless youth face for college, we focused primarily on unaccompanied homeless youth because they are asked to identify themselves as such when they apply for federal student aid on the FAFSA, while homeless youth living with their families are not distinguishable from other students.

[63]The authorized program directors cited in the FAFSA include school homeless liaisons or directors of HUD-funded emergency shelters or transitional housing programs or directors of runaway or homeless youth centers or programs funded by HHS. 20 U.S.C.A. § 1087vv(d)(1)(H)(i)-(iii).

Education's guidance, the financial aid administrator should document that a student meets the definition of an unaccompanied homeless youth—either with documentation from a third-party source provided by the student or, if the student does not have such documentation, the financial aid administrator can interview the student about his or her living situation and document the interview.[64] There are no specific requirements in law or Education's guidance about what kind or how much documentation is needed to demonstrate a student's status. Financial aid administrators can accept documentation of homelessness from recognized third-parties, such as high school counselors, social workers, mentors, doctors, and clergy, according to Education's guidance. Although these other professionals cannot directly make the determination of homelessness, financial aid administrators can use information from these professionals to support and document their own determinations.[65]

As noted in Education's most recent guidance, some colleges were unnecessarily restricting applicants' access to student aid by asking them to justify why they are homeless or unaccompanied rather than requesting evidence to demonstrate that they are homeless or at risk of being homeless. Similarly, homeless students in both of our discussion groups told us they were asked multiple times to explain why they were homeless and not living with their families, and one was asked to produce a copy of a police report to explain her family situation. Asking personal and intrusive questions often causes unaccompanied homeless students to walk away before completing the financial aid process, according to officials from higher education organizations. For example, homeless youth who are estranged from family because of parental sexual or other kinds of abuse do not want to repeatedly share these personal details and choose not to complete the process to obtain federal student aid, according to an official from a higher education organization and financial aid administrator we spoke with. To address this issue, Education issued guidance in July 2015 that institutions should limit any inquiries to

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[64]*Application and Verification Guide* from Education's 2015-2016 *Federal Student Aid Handbook*.

[65]Financial aid administrators' decisions cannot be appealed to Education, according to Education guidance. Data on administrators' denials of unaccompanied homeless youth status are not available, according to a national homeless youth organization we contacted.

whether—not why—an applicant meets the criteria for being an unaccompanied homeless youth.[66]

In addition, financial aid administrators frequently ask homeless youth to provide extensive documentation about their situations, some of which can be difficult to obtain, according to officials from homelessness and higher education organizations and homeless youth we spoke to. For example, an unaccompanied homeless youth in one of our discussion groups told us that she had to submit many documents, including documentation for a group home that she had lived in 3 years earlier that kept such records at an off-site storage facility. Financial aid administrators at two colleges told us that documentation is hard for homeless students who are not in a situation where there is a third party to substantiate their living circumstances, such as those who are temporarily sleeping on a friend's or relative's couch because they have nowhere else to go and who have never connected with a formal social service organization. A college official in Michigan said that some financial aid administrators require an unaccompanied homeless youth to submit three pieces of documentation about his or her situation and do not understand how difficult these are for students to obtain. Education's July 2015 guidance states that, if a college has no conflicting information about the student's status, the college should not request additional documentation, proof, or statements because of the sensitive nature of these situations. Officials from two homeless organizations noted that some youth feel a stigma associated with being homeless and feel uncomfortable asking multiple parties for documentation. Furthermore, many financial aid administrators often do not exercise the option to interview students to determine whether they are unaccompanied homeless youth, and then document that interview for their records, according to higher education and homelessness officials we interviewed.

Having to obtain extensive documentation can make it difficult for homeless youth to complete the financial aid process on time. Until a financial aid administrator signs off that a student is unaccompanied and homeless, the student's FAFSA application is considered incomplete. Students in this situation can miss deadlines for getting federal student

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[66]This guidance was issued first in a July 2015 *Dear Colleague Letter* (DCL-GEN-15-16). The most recent *Application and Verification Guide* from September 2015 further notes that financial aid administrators should respect students' privacy, that some information is confidential, and that police or child protective services reports are not necessary.

aid and consequently may have to pay upfront costs themselves. For example, a homeless youth in one of our discussion groups said that the process took so long that she had to pay tuition upfront to hold her classes and then wait for reimbursement after providing the requested documentation. Another homeless youth in one of our discussion groups had no financial aid for an entire quarter because the application took more than 6 weeks to process.

The reluctance by financial aid administrators to make an unaccompanied homeless youth determination without considerable documentation may stem from a number of factors, according to financial aid administrators we spoke with and officials from higher education organizations. First, financial aid administrators at schools that assist few homeless students each year are likely to be less accustomed to assessing a student's homeless status and less familiar with the process. According to two financial aid administrators and officials from a higher education and a homelessness organization, financial aid offices may not typically work with a lot of homeless youth. Second, financial aid administrators work in a particularly risk-averse culture, according to Education officials, and higher education and homelessness officials we interviewed—many are concerned that future audits and oversight activities by Education could cite them for not complying with agency requirements for documentation, even though administrators are allowed to make determinations on the basis of their own interviews. For example, financial aid administrators at several colleges told us they are concerned that Education could question their determinations if they did not have documentation from other parties. Education officials said they have heard similar concerns, even though administrators are authorized under the Higher Education Act to make unaccompanied homeless youth determinations. Lastly, according to higher education and homelessness officials, financial aid administrators are accustomed to receiving official documentation, such as a marriage license or military papers from veterans, as primary support for their decisions when they change a student's status from dependent to independent. One college financial aid administrator we spoke to said that financial aid administrators are trained "from day one" that they need documentation for these types of decisions. However, administrators

have had the option to interview homeless students and document that interview since at least 2009, according to Education guidance.[67]

A national higher education organization and several financial aid administrators suggested that making a form available to help determine and document whether students are unaccompanied and homeless could make the process easier for both students and financial aid administrators. While such a form has been developed by two homeless organizations, Education has not adopted or encouraged the use of such a form. These officials told us that having Education adopt or encourage the use of such a form would be more effective in promoting its use.[68] Such an optional form could offer financial aid administrators a tool to document homeless students' situations, especially during interviews, as well as provide just-in-time guidance on federal requirements to help them recognize when they have enough documentation. It could also be particularly helpful for administrators who do not see many homeless student applicants and who may be less comfortable with interviews or some third-party documentation, such as letters from mentors, doctors, or clergy. Similarly, a worksheet or form could also help students navigate this complicated process and let them know what kind of documentation they may need to prepare for meetings with financial aid staff, according to financial aid administrators we interviewed.

In discussing this possibility, an Education official said that the agency could highlight the availability and usefulness of such a form in future guidance. According to Education officials, the agency cannot require financial aid administrators to use a standard form for documenting a student's status as an unaccompanied homeless youth because the agency is prohibited from regulating in this area.[69] Making a voluntary worksheet or form available for administrators to use to document an

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[67]This guidance was issued in response to changes made by the College Cost Reduction and Access Act, which expanded the definition of independent students to include students verified as unaccompanied homeless youth. *Application and Verification Guide,* 2009-2010.

[68]The National Association for the Education for Homeless Children and Youth in collaboration with the National Center for Homeless Education developed a two-page form that financial aid administrators can use when evaluating whether a student meets the definition of an unaccompanied homeless youth.

[69]Education is prohibited from regulating any part of the process that determines a student's eligibility for federal student aid. 20 U.S.C. § 1087rr(a).

interview or third-party information would be consistent with Education's strategic plan goal to make federal student aid information easily accessible.[70] Such a worksheet or form would also help financial aid administrators document their homeless youth determinations and would also help unaccompanied homeless youth better understand the financial aid process, demonstrate their status, and obtain the federal student aid for which they are eligible.

Annual Re-Verification of Homelessness Poses Barrier for Unaccompanied Homeless Youth

The requirements and process for identifying unaccompanied homeless youth can pose a barrier to these students obtaining federal student aid. By law, to be considered independent students, they must have their status as an unaccompanied homeless youth in the aid year verified by a McKinney-Vento homeless liaison, a program director cited in the FAFSA, or a financial aid administrator. Further, the Higher Education Act requires homeless students seeking independent status to have their circumstances re-verified by an authorized program official or a financial aid administrator each school year.[71] The same requirements apply to a student's initial verification and any re-verification in subsequent years—if a student cannot obtain a determination from one of the authorized program officials, a financial aid administrator must evaluate the student's situation and document the student's eligibility as an unaccompanied homeless youth with documentation from a third-party or a documented interview.

Officials from homelessness and higher education organizations that work with homeless youth told us that having a McKinney-Vento homeless liaison or other authorized program official verify a student's status as an

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[70]In its fiscal year 2012-2016 Strategic Plan, Education's Office of Federal Student Aid outlines a goal of ensuring that all participants in the system of postsecondary education funding, such as college financial aid administrators, serve the interests of students, from policy to delivery. One of Education's objectives under this goal is to work to ensure that all participants in the postsecondary education funding system can easily access the information they need to support their role. U.S. Department of Education, Office of Federal Student Aid, *Federal Student Aid Strategic Plan, Fiscal Years 2012-2016* (December 2011).

[71]20 U.S.C. § 1087vv(d)(1)(H). All students applying for federal student aid as independent students have to annually attest to their current or past circumstances. The FAFSA form requires all students applying for aid to certify that all of the information they provided is true and complete and cites fines and other penalties for false or misleading information.

unaccompanied homeless youth can be increasingly difficult after a student's first year of college. Information these organizations provide to students and other stakeholders on how to complete the FAFSA note that a student cannot obtain a homeless youth determination from a McKinney-Vento homeless liaison or the other authorized program officials if the student is not in high school or is not receiving services from one of the authorized programs. McKinney-Vento liaisons do not provide services to students who have left high school, and the other authorized programs either do not serve college-age students or do not serve them for extended periods of time.[72] As a result, it may be difficult for youth to obtain a homeless determination from officials of these programs in multiple years. For example, officials from homelessness and higher education organizations told us that once homeless youth are out of high school and no longer receiving services from the McKinney-Vento homeless program, the McKinney-Vento liaison cannot provide an unaccompanied homeless youth determination in subsequent years when youth are already in college. Instead, students are told that college financial aid offices can make that determination.

Education's policy on the authority of these program officials to make a homeless youth determination if a student is not receiving program services is unclear. Education's written guidance to financial aid administrators says that authorized program officials make a homeless youth determination if the student is receiving services from their program or, in the case of a McKinney-Vento homeless liaison, if the student is in high school.[73] Similarly, its student guide for completing the FAFSA says that authorized program officials "only make these determinations if you are in high school or receiving their services" and tells students that they should seek a determination from their financial aid officer if they are no longer in high school or not receiving the services of these programs.[74] However, Education officials told us that McKinney-Vento homeless liaisons and other authorized program officials can make a homeless

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[72]For example, HHS's Basic Centers provide up to 21 days of shelter for runaway and homeless youth under 18 years old, while the Transitional Living Program supports projects that provide residential and other services to runaway and homeless youth ages 16 to 22, for up to 21 months.

[73]Education's September 2015 *Application and Verification Guide*.

[74]Department of Education, Federal Student Aid, *Guide for Completing the FAFSA 2016–17* (Washington, D.C).

youth determination even if a student is no longer in high school or is not receiving program services. Education officials said that some school districts allow McKinney-Vento liaisons to make homeless youth determinations for youth no longer in high school, while others do not. Education officials pointed out that Education guidance acknowledges the existing practice of some McKinney-Vento liaisons to not make determinations for students when they are no longer in high school, not that McKinney-Vento liaisons cannot make these determinations. Further, an Education official said the agency expects financial aid administrators to accept determinations from authorized program officials even if the student is not receiving program services; however, the official acknowledged that Education's guidance does not explicitly say this.

Education's views on this issue are not fully and clearly stated in its written guidance. As a result, students who keep in touch with a McKinney-Vento liaison after high school may not be aware that they can seek a homeless youth determination from that individual. Similarly, homelessness and higher education organizations may continue to provide information on federal student aid to homeless students that does not fully reflect Education's policy. Officials from a higher education organization said that some students do maintain contact with McKinney-Vento liaisons and that not being able to obtain a determination from them after high school creates a barrier to having their situation re-verified. Authorized program officials are also sometimes in a position to verify a student's situation even if he or she is not receiving program services. For example, an Education official described a situation in which the director of an authorized homeless shelter could verify that a student was eligible for services, but was not receiving services because the program was full. If students and financial aid administrators do not realize that these are options, it can make a difficult process even more challenging. Education officials acknowledged that their written guidance may not be as clear as it could be and said they were planning to update it but did not provide a timeframe for when changes would be made. Federal internal controls require agencies to use relevant and reliable communications. Without clear guidance from Education, students seeking federal student aid may not be aware that they can request a homeless youth determination from authorized program officials even if

they are not receiving program services, and financial aid administrators may not know that they should accept these determinations.[75]

In addition, unaccompanied homeless youth who must rely on a financial aid administrator to make a homelessness determination find it challenging to provide documentation of their circumstances, if, for example, they live in a car or tent or are temporarily sleeping on someone's couch, according to officials from homeless and higher education organizations we interviewed. Providing documentation of these circumstances for multiple years is even more challenging. While data are not available on the number of homeless youth who are unable to obtain a determination after their first year, officials from organizations who work with homeless youth told us that obtaining a determination in subsequent application years was a common problem. For example, an official from a national homeless organization said that the organization has received multiple calls on its hotline in the past 2 years from students who were having difficulty obtaining a subsequent FAFSA homeless determination even though their status had not changed while in college. In one example, a student experienced delays that led to her losing work-study funding and other financial aid. According to officials at this homeless organization, other students have had to skip a semester or have been dropped from their classes after not receiving aid by the college's deadline. Because of these issues, the homeless organization has recommended the elimination of the requirement for these students to be re-verified each year as unaccompanied and homeless, unless there is information suggesting a change of status.[76]

An Education official told us that eliminating the re-verification requirement for unaccompanied homeless youth seemed reasonable, and noted that Education is exploring administrative options to reduce the burden on FAFSA applicants who are homeless and that a legislative

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[75]According to federal internal controls, for an entity to run and control its operations, it must have relevant, reliable, and timely communications relating to internal as well as external events. Information is needed throughout the agency to achieve all of its objectives. Effective communications should occur in a broad sense with information flowing down, across, and up the organization. GAO, *Standards for Internal Control in the Federal Government.* GAO/AIMD-00-21.3.1 (Washington, D.C.: November 1999).

[76]National Association for the Education of Homeless Children and Youth, *Financial Aid for Unaccompanied Homeless Youth: A Survey Report* (Minneapolis, MN: 2014). The National Association of Financial Aid Administrators cosponsored the survey for this report.

solution could be helpful. To date, however, the agency has not sent a legislative proposal to Congress on this specific issue. Federal student aid policies, such as the annual re-verification requirement, seek to encourage access to funds for eligible students while also ensuring program integrity. Their purpose is to ensure that students are appropriately classified as dependent or independent so that federal student aid funds are appropriately provided for students who have a financial need. For unaccompanied homeless youth, however, an annual re-verification requirement may keep otherwise eligible students from accessing federal student aid.

While it is possible that a student could be unaccompanied and homeless one year but reunite with a parent in a subsequent year and no longer qualify as an independent student, several federal and state officials and officials from a national homelessness organization told us that students who receive a homeless youth determination are unlikely to experience a change in their living situation in subsequent years.[77] Homeless youth who have been subject to parental abuse may be unable to return home, for example, and homeless youth whose parents have died or are incarcerated may not have other family members to support them. According to an official at a national homeless organization, one unaccompanied homeless youth had to track down her homeless, abusive, and addicted mother in an attempt to obtain family income information when the student could not obtain a homelessness determination for a subsequent year. Colorado officials said that in some cases it can be dangerous for unaccompanied homeless youth to return and that they are aware of situations in which homeless youth have been physically attacked by their parents when they try to obtain signatures for the FAFSA.

As noted earlier, many foster and homeless youth have similar life experiences, including chaotic, unstable living situations and experiences with abuse and neglect. However, the financial aid process is more complicated and presents more barriers for unaccompanied homeless youth, according to officials we interviewed from a national homelessness

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[77]See also National Center for Homeless Education, *Best Practices in Homeless Education: Increasing Access to Higher Education for Unaccompanied Homeless Youth: Information for Colleges and Universities (*Washington, D.C.)

organization.[78] Specifically, while foster youth must also attest to their status each year on the FAFSA, they only have to indicate that they have been in foster care at any time since they were 13 years old.[79] In addition, the FAFSA also instructs foster youth to answer "yes" even if their situation has changed and they are no longer in foster care. For foster youth, it does not matter whether they were in foster care for 1 week or 8 years. This is different for unaccompanied homeless youth who have to typically document their continued homelessness each year in order to be re-verified.

This difference between foster youth and unaccompanied homeless youth places an additional burden on unaccompanied homeless youth, whose many challenges make them no better equipped to effectively navigate complex financial aid application processes. In 2007, the College Cost Reduction and Access Act expanded the definition of "independent students" to include unaccompanied homeless youth and enabled them to apply for federal student aid without reporting parental income. As noted during debate prior to enactment of the law, these provisions were designed to address the barriers these vulnerable students face in pursuing their education and simplify the process for applying for federal student aid.[80] However, the statutory requirement that a student's status as an unaccompanied homeless youth be verified each year can pose a barrier to their obtaining federal student aid. By developing a legislative proposal to change this requirement, Education could help address this barrier.

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[78]Runaway and homeless youth have described abuse and neglect as common experiences. Youth who run away often have a history of involvement in the foster care system. On the last day of fiscal year 2013, states reported 4,450 foster children (1% of all foster children) as "runaways." Adrienne L. Fernandes-Alcantara, Congressional Research Service, *Runaway and Homeless Youth: Demographics and Programs.* (Washington, D.C.: January 20, 2015). See also Courtney et al., *Midwest Evaluation*.

[79]The FAFSA notes that financial aid administrators may request proof that a student has been in foster care. If financial aid administrators request proof that a youth has previously been in foster care, these youth can request documentation from their child welfare agency. Officials in Michigan told us that, to make it easier for foster youth, they created a standard form that youth can use to document their foster care status for the FAFSA and noted that another state has created a data exchange to allow colleges to verify a student's foster care status. Such proof is easier for foster youth to obtain than the process unaccompanied homeless youth have to go through to prove their homelessness.

[80]Statement of Senator Murray, 153 Cong. Rec. S. 11241, 11252 (Sept. 7, 2007).

Age Eligibility Rule Hinders Some Foster Youths' Access to Chafee Education and Training Vouchers

While HHS offers Chafee ETV vouchers to help foster youth pay for college, this program also has age eligibility requirements that can make it harder for them to use these vouchers. Chafee ETV vouchers offer an important financial support that supplements other federal grants for which foster youth are eligible. However, the program has age eligibility rules that limit participation, according to foster youth in one discussion group and officials from organizations familiar with foster youth issues with whom we spoke. Under current law, former foster youth must be receiving Chafee ETV funds before they turn 21 in order to continue eligibility for the voucher through age 22. Specifically, the law introduces a two-part rule for ETV eligibility whereby, at states' discretion, former foster youth ages 20 and under who begin receiving Chafee ETV vouchers may continue receiving ETV vouchers until they turn age 23.[81] In contrast, former foster youth ages 21 and 22 who did not previously receive a Chafee ETV voucher are not eligible to receive a voucher.

One of the voucher program's key purposes is to make funds available for education to students who have aged out of foster care to help them achieve self-sufficiency.[82] This two-part eligibility rule can undermine that program goal and can be confusing to foster youth seeking support for college. Foster youth in one discussion group said they did not know about Chafee ETV vouchers until after they turned 21, when they were no longer eligible to receive funds. According to Congressional Research Service (CRS) and state officials, many foster youth start college at older ages than traditional students. If they start college at age 21, however, they may miss an opportunity to obtain a voucher for 2 years for which they would otherwise be eligible. Some state officials we spoke with said this rule creates an unnecessary barrier for foster youth. State officials in Colorado and foster youth told us that foster youth find it difficult to begin their college education without these funds. A foster youth in one of our discussion groups told us that he did not find out about the Chafee ETV voucher until after age 21 and had to leave college when he could not afford to pay for it. According to one major study of three Midwest states, 35 percent of former foster youth reported that they had dropped out of a

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[81]42 U.S.C. § 677(i)(3). To continue receiving the ETV vouchers through age 22, foster youth must be enrolled in a postsecondary education or training program and be making satisfactory progress toward completion of the program Currently, every state and the District of Columbia has extended their Chafee ETV programs through age 22.

[82]42 U.S.C. § 677(a)(5)-(6).

college program and the most commonly cited barrier to continuing their education, by a large margin, was being unable to pay for school.[83] According to HHS, 16 states returned more than $1.2 million in unused Chafee ETV voucher funds to the federal Treasury in 2012, the latest date for which we have data.[84] Allowing students to enter the Chafee ETV voucher program at an older age could allow more foster youth to benefit from this program without necessarily affecting program funding. HHS officials noted that simplifying the age eligibility requirements could help states provide these vouchers seamlessly to foster youth through age 23; however, the agency has not developed a legislative proposal to encourage congressional action on this issue. Doing so could help ensure that foster youth who start college after they turn 21 are able to take advantage of available Chafee ETV funds meant to help them go to college and achieve self-sufficiency, as the program intended.

Conclusions

Lacking a stable family home and support from parents, homeless youth and foster youth are a particularly vulnerable group of young people who face significant challenges in pursuing college. Federal program requirements call for child welfare caseworkers and McKinney-Vento homeless liaisons to have some role in helping these students plan for college. In practice, however, these professionals are often focused on helping these youth find housing and graduate from high school, and their expertise with college planning and federal student aid is often limited. School homeless programs and child welfare systems have different purposes and competing priorities that do not necessarily focus on college planning, and it is important that any effort to encourage these professionals to more effectively provide college planning for homeless and foster youth consider program goals, priorities, workload, and

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[83]Courtney, et al., *Midwest Evaluation*.

[84]CRS issued a 2013 memorandum on unused Chafee funds. In discussing policy options, the CRS report suggests that allowing entry into the ETV voucher program at an older age may enable more youth to benefit from the program and more states to expend their unused funds. CRS found that funds were returned for a variety of reasons, including a lack of financial aid knowledge on the part of child welfare workers and foster youth's lack of preparedness for college. Stakeholders CRS contacted emphasized that ETV funds are essential to provide supportive services for youth aging out of foster care, and that the unused funds should not suggest that the state has excessive resources for these services. CRS, *Memorandum, Chafee Foster Care Independence Program and Education and Training Voucher Program: Unused Funds and Program Evaluations* (Washington, D.C.: Aug. 21, 2013).

responsibilities. Education and HHS administer these programs, making them well positioned to study available options for encouraging better college planning efforts. Further, in the absence of knowledgeable adults to help navigate the complex college admissions and financial aid processes, it is important for these students to have easy access to information on federal student aid and other federal support programs to help them pursue college. However, Education's website has little centralized information on federal student aid and other college-related resources directed specifically to homeless and foster youth, even though the Higher Education Act requires Education to provide students with information to help make college decisions and to continually improve the usefulness and accessibility of this information.

Federal supports, such as federal student aid and HHS's Chafee Education and Training vouchers, are available to help pay for college, yet eligible homeless and foster youth face program barriers to accessing them. When college financial aid officers require homeless students to provide burdensome documentation beyond what is needed or are reluctant to verify students' homelessness, some homeless students may not apply for federal student aid for which they are eligible and would be unable to afford college. Making a voluntary worksheet or form available to guide and document homeless youth determinations could make the process easier for both students and financial aid administrators. Homeless youth can find it especially difficult to obtain verification of homelessness from the specific program directors authorized by law after their first year of college, when they may no longer be served by these programs. While Education officials stated that program officials authorized by law can make homeless youth determinations for students not receiving program services, this is not clearly communicated in Education's written guidance, making it harder for these students to obtain a homeless youth determination. Homeless youth also find it difficult to document their circumstances when they are in tenuous living arrangements not served by formal programs. Homeless youth who need a college financial aid administrator to verify their homelessness typically have to provide documentation of their continued homelessness each year—unlike foster youth who only need to attest on the FAFSA that they have previously been in foster care. This requirement, and the additional burden it can create, does not promote the goal of the College Cost Reduction and Access Act to improve college access for homeless youth. A legislative proposal from Education to change this requirement could help address this barrier. Finally, for some foster youth, the age eligibility requirements for HHS's Chafee Education and Training Vouchers can create a barrier to available financial assistance. The voucher program

provides funds to help foster youth go to college and achieve self-sufficiency, but when foster youth begin college at a later age or do not apply for these vouchers until they are 21, they are unable to use a key financial support that can help them pay for college for 2 additional years. A legislative proposal from HHS could help address this age restriction for foster youth who are otherwise eligible to use this support to attend and complete college.

Recommendations for Executive Action

1. To help foster and unaccompanied homeless youth better navigate the college admissions and federal student aid processes, the Secretaries of Education and HHS should jointly study potential options for encouraging and enabling child welfare caseworkers, McKinney-Vento homeless youth liaisons, and other adults who work with these youth to more actively assist them with college planning.

2. To help foster and unaccompanied homeless youth, as well as adults who assist these youth, better navigate the federal student aid process and obtain information about college resources, the Secretary of Education, in consultation with the Secretary of HHS, should create webpages directed to homeless and foster youth so they can more easily find tailored and centralized information about available federal and other resources, such as Pell Grants, Chafee ETV Vouchers, and waivers for college admission tests.

3. To help college financial aid administrators more effectively implement eligibility rules for unaccompanied homeless youth, the Secretary of Education should make available an optional worksheet or form that college financial aid administrators can voluntarily use to document unaccompanied homeless youth status or encourage the use of existing forms that are available.

4. To help homeless youth more easily access federal student aid, the Secretary of Education should clarify its guidance to financial aid administrators and students about whether financial aid administrators should accept any unaccompanied homeless youth determination provided by McKinney-Vento homeless liaisons or other authorized officials even if a student is not in high school or receiving program services.

5. To enhance access to federal student aid for unaccompanied homeless youth, the Secretary of Education should consider developing a legislative proposal for congressional action to simplify the application process so that once a student has received an initial determination as an unaccompanied homeless youth, the student will not be required to have that status re-verified in subsequent years but

attest to their current status on the FAFSA, unless a financial aid administrator has conflicting information.

6. To simplify program rules for Chafee ETV vouchers and improve access to these vouchers for former foster youth ages 21 and 22, the Secretary of HHS should consider developing a legislative proposal for congressional action to allow foster youth to be eligible for the Chafee ETV voucher until age 23 without also requiring that they start using the voucher before they turn 21.

Agency Comments and Our Evaluation

We provided a draft of the report to the Department of Education and the Department of Health and Human Services for review and comment. Education and HHS provided written comments, which are reproduced in appendixes III and IV, as well as technical comments, which we incorporated as appropriate.

In its written comments, Education agreed with one of our recommendations and did not specifically agree or disagree with the other recommendations; however, the agency generally noted actions it was taking to address the recommendations.

- In response to our recommendation for Education and HHS to jointly study options for encouraging professionals to more actively help homeless and foster youth with college planning, Education referred to its work with HHS and a national homelessness organization on federal student aid issues and said that the agency will continue to encourage more active assistance in college planning. It also mentioned that its grantees in Education's higher education programs work with disenfranchised youth, including unaccompanied homeless youth, and assist them with college planning.

- In its response to our recommendation that Education create webpages directed to homeless and foster youth, Education noted that it has a webpage about foster youth and that it had just created a new webpage with resources for homeless children and youth in mid-April, after we provided our draft report to Education for comment. Making more information available online is an encouraging step in the right direction. However, much of the information on these webpages is about programs unrelated to college and is not directed at foster or homeless youth who want to apply to college. Instead, they contain technical information largely directed to policymakers, practitioners, and the general public, rather than providing information homeless and foster youth can easily use to help plan for and apply to

college. In addition, these webpages are not easy to find from the main Education webpage for students looking for college information. As a result, we continue to believe that Education, in consultation with HHS, should create webpages tailored to the needs of homeless and foster youth that students can find without extensive searching. Education also said that it is working to complete a factsheet of resources for unaccompanied homeless youth. In completing this factsheet, it will be important for Education to make sure that the factsheet is directed towards these youth, contains information relevant to planning for and applying to college, and is located in such a place that students can easily find it.

- In response to our recommendation that Education make available an optional form that financial aid administrators can use for documenting the status of unaccompanied homeless youth, Education agreed that it would be helpful to make forms developed by outside organizations available for financial aid administrators. Education also said that it plans to highlight the availability of these forms and provide guidance at its annual conference and in updates to the *Federal Student Aid Handbook*.

- In response to our recommendation that Education clarify its guidance on unaccompanied homeless youth determinations, Education said that it will continue to issue guidance through conference presentations and publications, including the *Federal Student Aid Handbook.* In its technical comments, Education acknowledged that it could broaden its guidance and technical assistance to clarify that Runaway and Homeless Youth program directors and shelter directors funded by HUD can write these letters of verification even when their shelters are full and they turn the youth away. Given the lack of clarity, however, we continue to believe Education should revise its guidance to clarify when financial aid administrators should accept unaccompanied homeless youth determinations from authorized officials.

- Lastly, in response to our recommendation for Education to consider developing a legislative proposal so that youth with an initial unaccompanied homeless youth determination are no longer required to have their status re-verified in future years, Education noted that it will consider our recommendation within the context of its proposal for further FAFSA simplification contained in the agency's fiscal year 2017 budget.

In its written comments, HHS agreed with our recommendations.

- In response to our recommendation that Education and HHS jointly study options for encouraging professionals to more actively help homeless and foster youth with college planning, HHS said that it agreed. HHS further noted that both agencies were working together to develop a transition guide for youth in foster care that would provide foster youth, and the adults working with them, with more information about the range of federal and state educational resources available.

- In response to our recommendation that Education, in consultation with HHS, create webpages directed to homeless and foster youth, HHS agreed and said that the agency would continue to partner with Education on these webpages and other efforts to assist homeless and foster youth with college planning.

- HHS also agreed with our recommendation to consider a legislative proposal to simplify program rules for Chafee ETV vouchers.

We are sending copies of this report to the Secretaries of Education and HHS, relevant congressional committees, and other interested parties. In addition, the report is available at no charge on the GAO website at http://www.gao.gov.If you or your staff have any questions about this report, please contact me at (617) 788-0534 or emreyarrasm@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix V.

Sincerely yours,

Melissa Emrey-Arras
Director, Education, Workforce, and Income Security

Appendix I: Objectives, Scope, and Methodology

Overview

This report examines: (1) What is known about college enrollment and completion for youth who have been in foster care or who are homeless? (2) To what extent do the challenges identified by researchers and stakeholders affect the ability of foster and homeless youth to pursue college? (3) To what extent do program barriers exist that could hinder these youth from obtaining federal financial assistance for college?

We used multiple methodologies to conduct this study. To analyze federal postsecondary education data on foster care and homeless youth, including available data about financial assistance programs, we used data from three federal databases. These included (1) administrative data on recipients of federal student aid from the Department of Education's (Education) Common Origination and Disbursement System (COD); (2) data on college enrollment and degree program characteristics from the nationally representative National Postsecondary Student Aid Study (NPSAS); and (3) data on graduation rates from the Beginning Postsecondary Students Longitudinal Study (BPS). We assessed the reliability of COD, NPSAS, and BPS data by reviewing existing information about the data and the system that produced them and interviewing agency officials knowledgeable about the data. We determined that the data were sufficiently reliable for the purposes of describing enrollment and completion information for homeless and foster youth.

We also conducted a review of academic studies that were based on original research to determine what is known about foster and homeless youths' college enrollment and completion. We assessed the quality of these studies by evaluating their research methods and determined that the studies we selected were sufficiently reliable for our use. We also conducted an additional analysis of the comparison group used in one study—for this analysis, we obtained data from the National Longitudinal Study of Adolescent to Adult Health (Add Health).[1] We also reviewed relevant federal laws and guidance on federal student aid and other college support programs for homeless and foster youth. In addition, we conducted interviews with officials from Education, HHS, and the Department of Housing and Urban Development (HUD); state officials from selected states; and officials and experts from eight organizations

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[1] Kathleen Mullan Harris, *Wave IV, 2007-2009*, The National Longitudinal Study of Adolescent to Adult Health (Add Health), accessed November 24, 2015, http://www.cpc.unc.edu/projects/addhealth/data.

knowledgeable about child welfare, homelessness, or higher education issues. We selected these states based on the number of foster youth ages 16-21 in the state, the number of homeless applicants for federal student aid, promising postsecondary initiatives for homeless or foster youth, state approaches to the federal option to expand foster care up to age 21 instead of 18, and geographic distribution. Lastly, we convened two discussion groups with homeless youth and two discussion groups with foster youth in the greater Washington DC area to discuss any challenges they faced in enrolling in and completing college. We assessed Education's efforts to provide information on federal student aid and access to these programs with related provisions in the Higher Education Act as amended by the College Cost Reduction and Access Act as well as with Education's strategic plan and federal standards for internal controls. We also reviewed the college planning responsibilities of child welfare caseworkers and McKinney-Vento homeless liaisons as described in the Social Security Act and the McKinney-Vento Homeless Assistance Act.

We conducted this performance audit from October 2014 to May 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Data Sources and Analysis

COD: To provide information on the homeless and foster youth enrollment in college, as well as the types of schools they attended, we analyzed data on financial aid recipients for the 2013-2014 federal student aid award year from Education's Common Origination and Disbursement System. We chose this time period because it was the most recent and complete financial data available, according to Education officials. The Common Origination and Disbursement system provides a common student record reporting system for disbursements from federal student aid programs, including both Pell Grants and Direct Loans.

NPSAS: We used NPSAS data to analyze foster and homeless youth's enrollment in higher education. NPSAS compiles student-level records on college enrollment and financial aid provided by the federal government, states, colleges, employers, and private organizations. NPSAS data are collected every 3-4 years from a variety of sources for a large, nationally representative sample of all students, regardless of enrollment type, who

are enrolled in a Title IV eligible program during the relevant school year.
Student data are collected through web-based self-administered and
computer-assisted telephone interviews. NPSAS contains historical
information on foster care students, but data on homeless students are
only available for its most recent year—2011-2012—as of the date of this
report.

BPS: We used BPS data to analyze the extent to which foster youth who
began college completed a postsecondary degree. BPS tracks a cohort of
students over a 6-year period. The most recently completed BPS cohort
first enrolled in postsecondary education in the 2003-2004 school year.
The final follow-up with the group was the 2008-2009 school year. For our
analysis, we used the BPS variable for highest degree attained anywhere
through June 2009. We chose this variable because it allowed us to track
completion for students even if they transferred from their original
institution.

Add Health: We obtained Wave IV data from the National Longitudinal
Study of Adolescent to Adult Health (Add Health) to calculate estimates
and 95 percent confidence intervals of college experience, i.e. completion
of at least 1 year of college, of the general U.S. population for comparison
to those of foster youth in one academic study.[2] The Add Health
percentage estimates of educational attainment levels cited in this report
have a 95 percent confidence interval of within plus or minus 10
percentage points. Add Health is a longitudinal study of a nationally
representative sample of adolescents in the United States. The Add
Health study cohort has been followed from middle school into young
adulthood through in-home interviews, the most recent of which took
place in 2008.

Because the NPSAS and BPS data are based on probability samples,
estimates are formed using the appropriate estimation weights provided
with each survey's data. Because each of these samples follows a
probability procedure based on random selection, they represent only one
of a large number of samples that could have been drawn. Since each
sample could have provided different estimates, we express our
confidence in the precision of our particular sample's results as a 95
percent confidence interval (e.g., plus or minus 7 percentage points). This

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[2]Courtney, et al., *Midwest Evaluation.*

is the interval that would contain the actual population value for 95 percent of the samples we could have drawn. Unless otherwise noted, all percentage estimates cited in this report from NPSAS and BPS have 95 percent confidence intervals within +/- 10 percentage points, and are within +/- 10 percent of the estimate itself for other numerical estimates. We conducted t-tests and compared confidence intervals to identify statistically significant differences between foster/homeless youth and the comparison groups.

Laws and Policies

To determine the extent to which program barriers exist that can hinder homeless students and foster youth from obtaining federal financial assistance for college, we reviewed relevant federal laws, including the Higher Education Act of 1965, provisions of the Social Security Act governing the John H. Chafee Foster Care Independence Program and the Chafee ETV Voucher Program, provisions of the McKinney-Vento Homeless Assistance Act governing the Education for Homeless Children and Youth Program, and provisions of the Runaway and Homeless Youth Act governing the Transitional Living Grant Program We also reviewed relevant Education and HHS policies and guidance related to these federal programs that provide financial assistance to homeless students and foster youth for college.

Review of Studies

To determine what is known about college outcomes for homeless and foster youth, we conducted a literature search for quantitative studies that provided outcome data (e.g., enrollment and completion). To identify existing studies, we conducted searches of various databases, such as ERIC, ProQuest Education Journals, and WorldCat. Through these databases, we identified 76 studies that were published between 2005 and 2015 and were relevant to our research objectives on college outcomes for homeless and foster youth. We then identified 17 studies that met the following criteria: conducted original research and included a quantitative methodology. We assessed the quality and methodological rigor of each of the 17 studies that met our inclusion criteria according to generally accepted social science research standards. Each study was evaluated by a GAO analyst with specialized expertise in research methodology or statistics, and was reviewed by a second GAO analyst with similar expertise. Our review considered results from the 12 studies that we found were acceptable through this review process.

Interviews with Federal and Selected State Officials and Officials from Knowledgeable Organizations

To understand any challenges and barriers homeless students and foster youth face in accessing federal financial aid and pursuing college, we interviewed officials at the Department of Education, the Department of Health and Human Services (HHS), Department of Housing and Urban Development (HUD), and the Congressional Research Service (CRS). More specifically, at Education, we interviewed officials from the Office of Elementary and Secondary Education, the Office of Postsecondary Education, the Office of Federal Student Aid, the Budget Office, and the National Center for Education Statistics. At HHS, we interviewed officials from the Children's Bureau and the Family and Youth Services Bureau. At HUD, we interviewed officials from the Office of Special Needs Assistance Programs. At CRS, we interviewed officials knowledgeable about homeless students and foster youth seeking college.

To gather more in-depth information on any challenges and barriers homeless students and foster youth face in accessing federal student aid, we conducted interviews with officials in four states—California, Colorado, Michigan, and Virginia. We selected these states based on the number of foster youth ages 16-21 in the state, the number of homeless youth seeking college education, promising college initiatives for homeless or foster youth in that state, state approaches to the Title IV-E option to expand foster care up to age 21, and geographic distribution. Findings associated with our outreach to these selected states cannot be generalized to all states' homeless student and foster youth populations; rather, they provide insight into a range of views and experiences with federal programs that provide financial support to homeless and foster youth.

We also interviewed representatives from a broad range of organizations knowledgeable about homeless students and foster youth as well as programs that serve these populations, including: the American Bar Association's Center for Children and the Law's Legal Center for Foster Care and Education, Casey Family Programs, Foster Care to Success, the National Association of College Admissions Counseling, the National Association for the Education of Homeless Children and Youth, the

National Association of Student Financial Aid Administrators, and the
National Center for Homeless Education.[3]

To further understand how easily homeless students and foster youth can
access federal student aid and other support programs for college, we
interviewed financial aid directors at three community colleges located in
three states.[4] We focused on community colleges for these interviews
because our data analyses showed that the largest percentage of foster
and homeless youth attend this type of college. We identified these
financial aid directors with assistance from the National Association of
Student Financial Aid Administrators. We also interviewed a college
financial aid director as part of the Michigan state interview with higher
education officials. While financial aid directors we interviewed provide
some insight into the programmatic barriers of homeless students and
foster youth, their responses are not generalizable to all financial aid
directors.

Discussion Groups with Homeless and Foster Youth

To describe any challenges that homeless and foster youth face in
applying to and enrolling in college, and to illustrate issues raised by
experts and available studies and data, we held four discussion groups—
two with youth who had experienced homelessness and two with youth
previously or currently enrolled in foster care. To organize these
discussion groups, we identified organizations or programs through
interviews and other contacts with federal agencies and organizations
that support homeless or foster youth. The number of homeless or foster
youth participating in the discussion groups ranged from 7 to 12.

All four discussion groups took place in the greater Washington, D.C.
area; however, two of the four groups drew upon students from across
the United States. One discussion group was composed of homeless
youth at an HHS-funded shelter for runaway and homeless youth.
Another discussion group was composed of homeless, or formerly
homeless, youth from across the country who participated in a national

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[3]We also attended congressional briefings on foster or homeless youths' challenges and
barriers to higher education organized by the Congressional Coalition on Adoption
Institute and the National Association for the Education of Homeless Children and Youth
as well as policy presentations and discussions on these issues for foster youth organized
by the American Youth Policy Forum.

[4]The community colleges were located in Maryland, North Carolina, and Ohio.

homeless organization's student scholars program located in Washington, D.C. Similarly, one foster youth discussion group was made up of students selected for a national program who represented a diverse number of states. The other discussion group of foster youth was made up of local students participating in a state-run program for foster youth at a community college in Virginia.

Each discussion group was led by a trained facilitator using an interview protocol designed for either the homeless youth or foster youth population and specifically tailored for each program or site. In addition, we used a short questionnaire to capture basic background information on the discussion group members. Information and views obtained from these discussion groups are not generalizable to any other homeless or foster youth.

Appendix II: College Enrollment and Completion of Foster Youth and Unaccompanied Homeless Youth Compared to Dependent Students

In addition to comparing foster youth and unaccompanied homeless youth to low-income and all other students, we also compared foster youth and unaccompanied homeless youth to low-income dependent students and all other dependent students (see figures 7, 8, and 9). We used dependent students as a comparison group for our analyses because the ages of these students (under 24) are similar to those of college-enrolled foster and homeless youth. We also used low-income dependent students as a comparison group because both the ages and incomes of these students are more similar to those of college-enrolled foster youth and homeless youth. The results of these analyses were largely similar to comparisons made to all low-income youth and all other youth presented in the report.

Figure 7: Comparison of Enrollment of Foster Youth to Dependent Students in College Degree Programs, by Estimated Percent of Students Enrolled, School Year 2011-2012
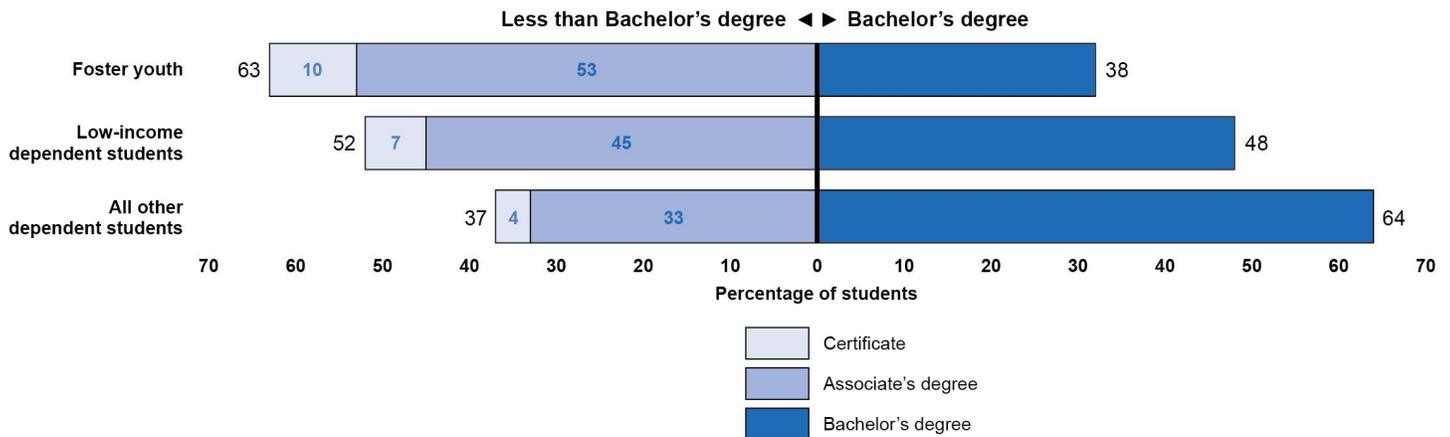

Source: GAO analysis of 2011-2012 National Postsecondary Student Aid Survey data. | GAO-16-343

Notes: Percentages may not add to 100 due to rounding. All foster youth comparisons are statistically significant at the 95 percent confidence level. All estimates have margins of error within plus or minus 10 percentage points. "Dependent students" refers to students who are considered financially dependent on their parents for the purposes of federal student aid programs and who must therefore report parental income to determine their eligibility for federal student aid. Foster youth are considered financially independent for the purposes of federal student aid programs and therefore report only their own income.

GAO-16-343 College Outcomes for Homeless and Foster Youth

Figure 8: Comparison of Estimated College Degree Completion Rates within 6 Years of First Enrollment, for Foster Youth and Dependent Students, as of 2009


Source: GAO analysis of 2008-2009 Beginning Postsecondary Students Longitudinal Study data. | GAO-16-343

[a]Percentage estimate is not statistically different from the foster youth estimate at the 95 percent confidence level.

Notes: Percentages may not add to 100 due to rounding. All foster youth comparisons are statistically significant at the 95 percent confidence level, unless otherwise indicated. All estimates have margins of error within plus or minus 10 percentage points, with the exception of the foster youth estimates: Confidence intervals for these estimates are 58 to 82 percent for no degree, 7 to 26 percent for certificate or associate's degree, and 6 to 25 percent for bachelor's degree. "Dependent students" refers to students who are considered financially dependent on their parents for the purposes of federal student aid programs and who must therefore report parental income to determine their eligibility for federal student aid. Foster youth are considered financially independent for the purposes of federal student aid programs and therefore report only their own income.

Figure 9: Comparison of Degree Program Enrollment for Unaccompanied Homeless Youth and Dependent Students, By Estimated Percent Enrolled, School Year 2011-2012

Less than Bachelor's degree ◄ ► Bachelor's degree

	Certificate	Associate's degree	Total (less than Bachelor's)	Bachelor's degree
Homeless youth	8	59	67	32
Low-income dependent students	7[a]	45	52	48
All other dependent students	4	33	37	64

Percentage of students

Certificate
Associate's degree
Bachelor's degree

Source: GAO analysis of 2011-2012 National Postsecondary Student Aid Survey data. | GAO-16-343

[a]Percentage estimate is not statistically different from the foster youth estimate at the 95 percent confidence level.

Notes: Percentages may not add to 100 due to rounding. All unaccompanied homeless youth comparisons are statistically significant at the 95 percent confidence level, except for the low-income dependent certificate category. All estimates have margins of error within plus or minus 10 percentage points, with the exception of unaccompanied homeless youth estimates in the associate's and bachelor's categories: Confidence intervals for these estimates are 45 to 73 percent for associate's and 20 to 48 percent for bachelor's degrees. "Dependent students" refers to students who are considered financially dependent on their parents for the purposes of federal student aid programs and who must therefore report parental income to determine their eligibility for federal student aid. Unaccompanied homeless youth are considered financially independent for the purposes of federal student aid programs and therefore report only their own income.

Appendix III: Comments from the U.S. Department of Education

April 14, 2016

Ms. Melissa Emrey-Arras
Director, Education, Workforce, and
  Income Security Issues
Government Accountability Office
Washington, DC 20548

Dear Ms. Emrey-Arras:

The U.S. Department of Education (Department) appreciates the Government Accountability Office's (GAO's) thorough report entitled, "Higher Education: Actions Needed to Improve Access to Federal Financial Assistance for Homeless and Foster Youth" (GAO-16-343). The report is a helpful description of some of the unique challenges faced by homeless and foster youth as they pursue postsecondary education.

The Department remains committed to removing barriers to education for homeless and foster youth. Department of Education Secretary John King was recently elected vice-chair of the U.S. Interagency Council on Homelessness and is eager to advance the federal government's goal of ending youth homelessness by 2020. In addition to the programs discussed in the report, there are other Federal programs, such as rental housing assistance (commonly referred to as Section 8 Housing) through the Department of Housing and Urban Development (HUD), where Federal rules and eligibility affecting these vulnerable populations could be examined.

With regard to the report's five recommendations for executive action by the Department of Education, we provide the following comments.

Recommendation 1: To help foster and unaccompanied homeless youth better navigate the college admissions and federal student aid processes, the Secretaries of Education and HHS should jointly study potential options for encouraging and enabling child welfare caseworkers, McKinney-Vento homeless youth liaisons, and other adults who work with these youth to more actively assist them with college planning.

Response: The Department has worked directly and consistently with community stakeholders, including Health and Human Services (HHS) and the National Association for the Education of Homeless Children and Youth (NAEHCY), on issues related directly to Title IV student aid. The Office of Postsecondary Education (OPE) and Federal Student Aid (FSA) will continue to work with adults who work with these youth to encourage more active assistance in the college planning process. Grantees in our higher education programs, including GEAR UP and TRIO Upward Bound, work actively with

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disenfranchised populations, including unaccompanied homeless youth, and assist participants with college planning. One of the absolute priorities in this year's TRIO Training Program grant competition is training on strategies for recruiting and serving hard to reach populations, including students who are homeless children and youths, and students who are in foster care or are aging out of the foster care system.

Recommendation 2: To help foster and unaccompanied homeless youth, as well adults who assist these youth, better navigate the federal student aid process and obtain information about college resources, the Secretary of Education, in consultation with the Secretary of HHS, should create webpages directed to homeless and foster youth so they can more easily find tailored and centralized information about available federal and other resources, such as Pell Grants, Chafee ETV Vouchers, and waivers for college admission tests.

Response: The Department has developed a webpage that addresses information related to students in foster care. The Department has also developed a new webpage (http://www2.ed.gov/about/inits/ed/supporting-homeless-students/index.html) that consolidates information on its resources for homeless children and youth from Pre-K through higher education, including information about independent status verification for the Free Application for Federal Student Aid (FAFSA). In addition, FSA is working to complete a factsheet for unaccompanied homeless youth that will combine all of the resources and information from studentaid.gov, ifap.ed.gov, and the FAFSA into one place.

Recommendation 3: To help college financial aid administrators more effectively implement eligibility rules for unaccompanied homeless youth, the Secretary of Education should make available an optional worksheet or form that college financial aid administrators can voluntarily use to document unaccompanied homeless youth status or encourage the use of existing forms that are available.

Response: The Department agrees that it would be helpful to highlight forms that outside agencies, nonprofits, or advocacy groups, including NAEHCY, have developed to assist Financial Aid Administrators (FAAs) in documenting unaccompanied homeless youth status. The Department intends to highlight the availability of such forms and provide guidance to the field about how to document unaccompanied homeless youth status through presentations at the annual FSA Conference and updates to the Student Aid Handbook.

This approach would avoid unintended consequences that could result from distribution of a Department-created form. The homeless youth determination as outlined in Department guidance must be done on a case-by-case basis and can be satisfied by conducting a documented interview if other written documentation is unavailable. An optional form created by the Department could discourage this type of case-specific analysis, and instead potentially lead to a "one size fits all" approach to homeless youth determinations. Thus, if the student appeared not to fit within the parameters of the

Page 3 - Ms. Melissa Emrey-Arras

Department-created form, a postsecondary institution might erroneously deny the homeless youth request.

Highlighting forms created by external agencies would provide a nimble and flexible approach to help FAAs rather than having the Department itself develop an optional form, because a Department-developed optional form would require clearance from the Office of Management and Budget under the Paperwork Reduction Act. Such clearance requirements would make it difficult for the Department to continually update and improve the form after approval in order to accommodate evolving issues within the unaccompanied homeless youth communities or in response to feedback from students, administrators, and institutions. Organizations such as NAEHCY have expertise on unaccompanied homeless youth as they work directly with these populations daily and can make quicker updates to forms as needed. The Department would not endorse any one form and would only highlight forms that already exist that may be helpful to FAAs. Ultimately, the FAA makes the final determination of homeless youth status regardless of which process or form is used, and that decision cannot be appealed to the Department.

Recommendation 4: To help homeless youth more easily access federal student aid, Education should clarify its guidance to financial aid administrators and students about whether financial aid administrators should accept any unaccompanied homeless youth determination provided by McKinney-Vento homeless liaisons or other authorized officials even if a student is not in high school or receiving program services.

Response: As noted in the report, the Department released a Dear Colleague Letter in 2015 that provided clarification to FAAs on conducting homeless youth determinations. We also provide yearly updates to the Federal Student Aid Handbook and present on homeless youth and Title IV issues each year at the Federal Student Aid Conference. We will continue to issue the most up-to-date guidance through presentations and publications.

Recommendation 5: To enhance access to federal student aid for unaccompanied homeless youth, Education should consider developing a legislative proposal for congressional action to simplify the application process so that once a student has received an initial determination as an unaccompanied homeless youth, the student will not be required to have that status re-verified in subsequent years but attest to their current status on the FAFSA, unless a financial aid administrator has conflicting information.

Response: In the President's FY 2017 budget proposal, the Department has proposed further simplification of the FAFSA. We will consider the simplification identified in Recommendation 5 within this context.

We look forward to continuing to work with students, Congress, higher education stakeholders, policy leaders, HHS, and our other Federal agency partners to ensure that homeless and foster youth are not hindered in accessing Federal financial assistance.

Page 4 - Ms. Melissa Emrey-Arras

Thank you for the opportunity to review the draft report and to provide comments on it.

Sincerely,

Ted Mitchell

Appendix IV: Comments from the U.S. Department of Health and Human Services

DEPARTMENT OF HEALTH & HUMAN SERVICES

OFFICE OF THE SECRETARY

Assistant Secretary for Legislation
Washington, DC 20201

APR 2 2 2016

Ms. Melissa H. Emery-Arras
Director, Education,
Workforce and Income Security Team
U.S. Government Accountability Office
441 G Street NW
Washington, DC 20548

Dear Ms. Emery-Arras:

Attached are comments on the U.S. Government Accountability Office's (GAO) report entitled, "*HIGHER EDUCATION: Actions Needed to Improve Access to Federal Financial Assistance for Homeless and Foster Youth*" (GAO-16-343).

The Department appreciates the opportunity to review this report prior to publication.

Sincerely,

Jim R. Esquea
Assistant Secretary for Legislation

Attachment

**GENERAL COMMENTS OF THE DEPARTMENT OF HEALTH AND HUMAN
SERVICES (HHS) ON THE GOVERNMENT ACCOUNTABILITY OFFICE'S DRAFT
REPORT ENTITLED: HIGHER EDUCATION: ACTIONS NEEDED TO IMPROVE
ACCESS TO FEDERAL FINANCIAL ASSISTANCE FOR HOMELESS AND FOSTER
YOUTH (GAO-16-343)**

The Department of Health and Human Services (HHS) appreciates the opportunity from the
Government Accountability Office (GAO) to review and comment on this draft report

GAO Recommendation#1:

The GAO recommends that the Secretaries of Education and HHS should jointly study potential
options for encouraging and enabling child welfare caseworkers, McKinney-Vento homeless
youth liaisons, and other adults who work with these youth to more actively assist them with
college planning.

HHS Response: HHS concurs with this recommendation and has already initiated work in this
area. The Administration for Children and Families (ACF) is currently working collaboratively
with the Department of Education (DOE). Both Departments are currently partnering to develop
a "*Transition Guide*" for youth in foster care. This technical assistance document will provide
resources to youth and the staff working with them about the range of federal and state
educational resources available to support youth in foster care and youth transitioning out of the
foster care system. The "*Transition Guide*" will also be used to encourage and enable child
welfare caseworkers, McKinney-Vento homeless youth liaisons, and other adults who work with
these youth to more actively assist them with college planning, and to improve access to federal
financial resources for homeless and youth in foster care. ACF anticipates the guides' release in
May of 2016.

GAO Recommendation# 2:

The GAO recommends that the Secretary of Education, in consultation with the Secretary of
HHS, should create webpages directed to homeless and foster youth so they can more easily find
tailored and centralized information about available federal and other resources, such as Pell
Grants, Chafee ETV Vouchers, and waivers for college admission tests.

HHS Response: HHS concurs with this recommendation and considers the creation of such
webpages as a product of the work described in our response to the first recommendation to
provide technical assistance to encourage and enable child welfare caseworkers, McKinney-
Vento homeless youth liaisons, and other adults who work with these youth to more actively
assist them with college planning, and to improve access to federal financial resources for
homeless and youth in foster care. HHS will continue to be a resource and partner to the
Department of Education in this endeavor.

Recommendation #3: The GAO recommends that HHS further simplify programs rules for
Chafee ETV vouchers and improve access to these vouchers for former youth ages 21 and 22,
HHS should consider developing a legislative proposal for congressional action to allow foster

youth to be eligible for the Chafee ETV voucher until age 23 without also requiring that they start using the voucher before they turn 21.

HHS Response: HHS concurs with GAO's recommendation to consider their suggested legislative proposal and will do so upon the approval of the Presidents fiscal year 2017 budget request. Where in the President proposed a legislative change to the Chafee ETV program to establish authority under the Chafee programs to redistribute any unobligated Chafee ETV funds available at the end of the two-year expenditure period to jurisdictions that indicate an interest in receiving additional funds for the program. The Administration looks forward to working with Congress to enact the proposed change. Should Congress decide to also include GAO's recommendation in legislation, we would be happy to discuss the recommendation with Congress.

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact

Melissa H. Emrey-Arras, (617) 788-0534 or emreyarrasm@gao.gov

Staff Acknowledgments

In addition to the contact named above, Michelle St. Pierre (Assistant Director), Deborah A. Signer (Analyst-in-Charge), Jessica Botsford, Nancy Cosentino, Maria Gaona, Ricky Harrison, Jean McSween, John W. Mingus, Jr., Amber Sinclair, Jeff Tessin, Shana Wallace, and Najeema Davis Washington made key contributions to this report. Also contributing to this report were Susan Aschoff, Rachel Beers, James Bennett, Deborah Bland, Will Colvin, Julia C. DiPonio, David M. Reed, Charlie Willson, and Paul C. Wright.

Appendix VI: Accessible Data

Agency Comment Letter

Text of Appendix III: Comments from the U.S. Department of Education

UNITED STATES DEPARTMENT OF EDUCATION

400 MARYLAND AVE. S.W., WASHINGTON, DC 20202

www.ed.gov

THE UNDER SECRETARY

April 14, 2016

Ms. Melissa Emrey-Arras

Director, Education, Workforce, and Income Security Issues

Government Accountability Office

Washington, DC 20548

Dear Ms. Ernrey-Arras:

The U.S. Department of Education (Department) appreciates the Government Accountability Office's (GAO's) thorough report entitled, "Higher Education: Actions Needed to Improve Access to Federal Financial Assistance for Homeless and Foster Youth" (GA0-16-343). The report is a helpful description of some of the unique challenges faced by homeless and foster youth as they pursue postsecondary education.

The Department remains committed to removing barriers to education for homeless and foster youth. Department of Education Secretary John King was recently elected vice- chair of the U.S. Interagency Council on Homelessness and is eager to advance the federal government's goal of ending youth homelessness by 2020. In addition to the programs discussed in the report, there are other Federal programs, such as rental

housing assistance (commonly referred to as Section 8 Housing) through the Department of Housing and Urban Development (HUD), where Federal rules and eligibility affecting these vulnerable populations could be examined.

With regard to the report's five recommendations for executive action by the Department of Education, we provide the following comments.

Recommendation 1: To help foster and unaccompanied homeless youth better navigate the college admissions and federal student aid processes, the Secretaries of Education and HHS should jointly study potential options for encouraging and enabling child welfare caseworkers, McKinney-Vento homeless youth liaisons, and other adults who work with these youth to more actively assist them with college planning.

Response: The Department has worked directly and consistently with community stakeholders, including Health and Human Services (HHS) and the National Association for the Education of Homeless Children and Youth (NAEHCY), on issues related directly to Title IV student aid. The Office of Postsecondary Education (OPE) and Federal Student Aid (FSA) will continue to work with adults who work with these youth to encourage more active assistance in the college planning process. Grantees in our higher education programs, including GEAR UP and TRIO Upward Bound, work actively with

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disenfranchised populations, including unaccompanied homeless youth, and assist participants with college planning. One of the absolute priorities in this year's TRIO Training Program grant competition is training on strategies for recruiting and serving hard to reach populations, including students who are homeless children and youths, and students who are in foster care or are aging out of the foster care system.

Recommendation 2: To help foster and unaccompanied homeless youth, as well adults who assist these youth, better navigate the federal student aid process and obtain information about college resources, the Secretary of Education, in consultation with the Secretary of HHS, should create webpages directed to homeless and foster youth so they can more easily find tailored and centralized information about available federal and other resources, such as Pell Grants, Chafee ETV Vouchers, and waivers for college admission tests.

Response: The Department has developed a webpage that addresses information related to students in foster care. The Department has also

developed a new webpage (http://www2.ed.gov/about/inits/ed/supporting-homeless-students/index.html) that consolidates information on its resources for homeless children and youth from Pre-K through higher education, including information about independent status verification for the Free Application for Federal Student Aid (FAFSA). In addition, FSA is working to complete a factsheet for unaccompanied homeless youth that will combine all of the resources and information from studentaid.gov, ifap.ed.gov, and the FAFSA into one place.

Recommendation 3: To help college financial aid administrators more effectively implement eligibility rules for unaccompanied homeless youth, the Secretary of Education should make available an optional worksheet or form that college financial aid administrators can voluntarily use to document unaccompanied homeless youth status or encourage the use of existing forms that are available.

Response: The Department agrees that it would be helpful to highlight forms that outside agencies, nonprofits, or advocacy groups, including NAEHCY, have developed to assist Financial Aid Administrators (FAAs) in documenting unaccompanied homeless youth status. The Department intends to highlight the availability of such forms and provide guidance to the field about how to document unaccompanied homeless youth status through presentations at the annual FSA Conference and updates to the Student Aid Handbook.

This approach would avoid unintended consequences that could result from distribution of a Department-created form. The homeless youth determination as outlined in Department guidance must be done on a case-by-case basis and can be satisfied by conducting a documented interview if other written documentation is unavailable. An optional form created by the Department could discourage this type of case-specific analysis, and instead potentially lead to a "one size fits all" approach to homeless youth determinations. Thus, if the student appeared not to fit within the parameters of the

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Department-created form, a postsecondary institution might erroneously deny the homeless youth request.

Highlighting forms created by external agencies would provide a nimble and flexible approach to help FAAs rather than having the Department itself develop an optional form, because a Department-developed optional form would require clearance from the Office of Management and Budget under the Paperwork Reduction Act. Such clearance requirements would

make it difficult for the Department to continually update and improve the form after approval in order to accommodate evolving issues within the unaccompanied homeless youth communities or in response to feedback from students, administrators, and institutions. Organizations such as NAEHCY have expertise on unaccompanied homeless youth as they work directly with these populations daily and can make quicker updates to forms as needed. The Department would not endorse any one form and would only highlight forms that already exist that may be helpful to FAAs. Ultimately, the FAA makes the final determination of homeless youth status regardless of which process or form is used, and that decision cannot be appealed to the Department.

Recommendation 4: To help homeless youth more easily access federal student aid, Education should clarify its guidance to financial aid administrators and students about whether financial aid administrators should accept any unaccompanied homeless youth determination provided by McKinney-Vento homeless liaisons or other authorized officials even if a student is not in high school or receiving program services.

Response: As noted in the report, the Department released a Dear Colleague Letter in 2015 that provided clarification to FAAs on conducting homeless youth determinations. We also provide yearly updates to the Federal Student Aid Handbook and present on homeless youth and Title IV issues each year at the Federal Student Aid Conference. We will continue to issue the most up-to-date guidance through presentations and publications.

Recommendation 5: To enhance access to federal student aid for unaccompanied homeless youth, Education should consider developing a legislative proposal for congressional action to simplify the application process so that once a student has received an initial determination as an unaccompanied homeless youth, the student will not be required to have that status re-verified in subsequent years but attest to their current status on the FAFSA, unless a financial aid administrator has conflicting information.

Response: In the President's FY 2017 budget proposal, the Department has proposed further simplification of the FAFSA. We will consider the simplification identified in Recommendation 5 within this context.

We look forward to continuing to work with students, Congress, higher education stakeholders, policy leaders, HHS, and our other Federal

agency partners to ensure that homeless and foster youth are not hindered in accessing Federal financial assistance.

| Page 4 | Thank you for the opportunity to review the draft report and to provide comments on it. |

Sincerely,

Ted Mitchell

Text of Appendix IV: Comments from the U.S. Department of Health and Human Services

| Page 1 | DEPARTMENT OF HEALTH & HUMAN SERVICES |

OFFICE OF THE SECRETARY

Assistant Secretary for Legislation

Washington, DC 20201

APR 22 2016

Ms. Melissa H. Emery-Arras

Director, Education,

Workforce and Income Security Team

U.S. Government Accountability Office

441 G Street NW

Washington, DC 20548

Dear Ms. Emery-Arras:

Attached are comments on the U.S. Government Accountability Office's (GAO) report entitled, "HIGHER EDUCATION: Actions Needed to

Improve Access to Federal Financial Assistance for Homeless and Foster Youth " (GA0- 16-343).

The Department appreciates the opportunity to review this report prior to publication.

Sincerely,

Jim R. Esquea

Assistant Secretary for Legislation

Attachment

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GENERAL COMMENTS OF THE DEPARTMENT OF HEALTH AND HUMAN SERVICES (HHS) ON THE GOVERNMENT ACCOUNTABILITY OFFICE'S DRAFT REPORT ENTITLED: HIGHER EDUCATION: ACTIONS NEEDED TO IMPROVE ACCESS TO FEDERAL FINANCIAL ASSISTANCE FOR HOMELESS AND FOSTER YOUTH (GA0-16-343)

The Department of Health and Human Services (HHS) appreciates the opportunity from the Government Accountability Office (GAO) to review and comment on this draft report

GAO Recommendation#1:

The GAO recommends that the Secretaries of Education and HHS should jointly study potential options for encouraging and enabling child welfare caseworkers, McKinney-Vento homeless youth liaisons, and other adults who work with these youth to more actively assist them with college planning.

HHS Response: HHS concurs with this recommendation and has already initiated work in this area. The Administration for Children and Families (ACF) i s currently working collaboratively with the Department of Education (DOE). Both Departments are currently partnering to develop a "Transition Guide" for youth in foster care. This technical assistance document will provide resources to youth and the staff working with them about the range of federal and state educational resources available to support youth in foster care and youth transitioning out of the foster care system. The "Transition Guide" will also be used to encourage and enable child welfare caseworkers , McKinney-Vento homeless youth liaisons, and other adults who work with these youth to more actively

assist them with college planning, and to improve access to federal financial resources for homeless and youth in foster care. ACF anticipates the guides' release in May of2016.

GAO Recommendation# 2:

The GAO recommend s that the Secretary of Education, in consultation with the Secretary of HHS, should create webpages directed to homeless and foster youth so they can more easily find tailored and centralized information about available federal and other resources, such as Pell Grants, Chafee ETV Voucher s, and waivers for college admission tests.

HHS Response: HHS concurs with this recommendation and considers the creation of such webpages as a product of the work described in our response to the first recommendation to provide technical assistance to encourage and enable child welfare caseworkers, McKinney- Vento homeless youth liaisons, and other adults who work with these youth to more actively assist them with college planning, and to improve access to federal financial resources for homeless and youth in foster care. HHS will continue to be a resource and partner to the Department of Education in this endeavor.

Recommendation #3: The GAO recommends that HHS further simplify programs rules for Chafee ETV vouchers and improve access to these vouchers for former youth ages 21 and 22, HHS should consider developing a legislative proposal for congressional action to allow foster

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youth to be eligible for the Chafee ETV voucher until age 23 without also requiring that they start using the voucher before they turn 21.

HHS Response: HHS concurs with GAO's recommendation to consider their suggested legislative proposal and will do so upon the approval of the Presidents fiscal year 2017 budget request. Where in the President proposed a legislative change to the Chafee ETV program to establish authority under the Chafee programs to redistribute any unobligated Chafee ETV funds available at the end of the two-year expenditure period to jurisdictions that indicate an interest in receiving additional funds for the program. The Administration looks forward to working with Congress to enact the proposed change. Should Congress decide to also include GAO's recommendation in legislation, we would be happy to discuss the recommendation with Congress.

Data Tables

Accessible Text for Figure 1: Federal Student Aid Application Process for Unaccompanied Homeless Youth

1. Student answers questions on Free Application for Federal Student Aid (FAFSA) form.

2. [General screening question to determine homeless status] On or after July 1, 2015, were you homeless or were you self-supporting and at risk of being homeless?

   a. If student answers "no," he/she is not considered homeless

3. If student answers "yes," student answers specific screening questions to determine unaccompanied homeless youth status:

   a. At any time on or after July 1, 2015, did your high school or school district homeless liaison determine that you were an unaccompanied youth who was homeless or were self-supporting and at risk of being homeless?

   b. At any time on or after July 1, 2015, did the director of an emergency shelter or transitional housing program funded by the U.S. Department of Housing and Urban Development determine that you were an unaccompanied youth who was homeless or were self-supporting and at risk of being homeless?

   c. At any time on or after July 1, 2015, did the director of a runaway or homeless youth basic center or transitional living program determine that you were an unaccompanied youth who was homeless or were self- supporting and at risk of being homeless?

4. If student answers "yes," student submits a completed FAFSA and the student is eligible for federal student aid as an independent student

5. If student answers "no" to any of the specific screening questions, the student submits incomplete FAFSA and must work with college financial aid administrator to obtain determination as an unaccompanied homeless youth

6. If the college financial aid administrator determines student to be homeless, the student is eligible for federal student aid as an independent student

   a. If the college financial aid administrator does not determine student to be homeless, the student is not considered independent for federal student aid purposes

Source: GAO analysis of Education's FAFSA application process. | GAO-16-343

Data Table for Figure 2: Types of Colleges Attended by Foster Youth and All Other Undergraduates, Free Application for Federal Student Aid Award Year, 2013-2014

Foster youth receiving federal student aid

College type	Percentage of all Foster youth receiving federal student aid	Size of college attended by the 73% of foster youth receiving federal student aid and attending public colleges	Percentage of the 73 percent attending public colleges
Public	73	Less than 2-year college	<1
For-profit	15	2-year college	43
Non-profit	12	4-year college	30

All other students receiving federal student aid

College type	Percentage of all other students receiving federal student aid	Size of college attended by the 65% of all other youth receiving federal student aid and attending public colleges	Percentage of the 65 percent attending public colleges
Public	65	Less than 2-year college	<1
For-profit	18	2-year college	29
Non-profit	17	4-year college	36

Source: GAO analysis of Common Origination and Disbursement System data. | GAO-16-343

Data Table for Figure 3: Comparison of Enrollment of Foster Youth and Other Students in College Degree Programs, by Estimated Percent of Students Enrolled, School Year 2011-2012

	Certificate	Associate's degree	Bachelor's degree
Foster youth	10	53	38
Low-income students	11	48	41
All other students	8	44	48

Source: GAO analysis of 2011-2012 National Postsecondary Student Aid Survey data. | GAO-16-343

Data Table for Figure 4: Comparison of Estimated College Degree Completion Rates within 6 Years of First Enrollment, for Foster Youth and Other Students, as of 2009

	No degree	Certificate or Associate's degree	Bachelor's degree
Foster youth	72	15	14
Low-income students	57	22	21
All other students	49	20	31

Source: GAO analysis of 2008-2009 Beginning Postsecondary Students Longitudinal Study data. | GAO-16-343

Data Table for Figure 5: Types of Colleges Attended by Unaccompanied Homeless Youth and All Other Undergraduates, Free Application for Federal Student Aid Award Year, 2013-2014

Unaccompanied homeless youth receiving federal student aid

College type	Percentage of all unaccompanied homeless youth receiving federal student aid	Size of college attended by the 79% of unaccompanied homeless youth receiving federal student aid and attending public colleges	Percentage of the 79 percent attending public colleges
Public	79	Less than 2-year college	<1
For-profit	7	2-year college	46
Non-profit	14	4-year college	32

All other students receiving federal student aid

College type	Percentage of all other students receiving federal student aid	Size of college attended by the 65% of all other youth receiving federal student aid and attending public colleges	Percentage of the 65 percent attending public colleges
Public	65	Less than 2-year college	<1
For-profit	18	2-year college	30
Non-profit	17	4-year college	36

Source: GAO analysis of Common Origination and Disbursement System data. | GAO-16-343

Data Table for Figure 6: Comparison of Degree Program Enrollment for Unaccompanied Homeless Youth and Other Students, By Estimated Percent Enrolled, School Year 2011-2012

	Certificate	Associate's degree	Bachelor's degree
Unaccompanied homeless youth	9	59	32
Low-income students	11	48	41
All other students	8	44	48

Source: GAO analysis of 2011-2012 National Postsecondary Student Aid Survey data. | GAO-16-343

Data Table for Figure 7: Comparison of Enrollment of Foster Youth to Dependent Students in College Degree Programs, by Estimated Percent of Students Enrolled, School Year 2011-2012

	Certificate	Associate's degree	Bachelor's degree
Foster youth	10	53	32
Low-income dependent students	7	45	48
All other dependent students	4	33	64

Source: GAO analysis of 2011-2012 National Postsecondary Student Aid Survey data. | GAO-16-343

Data Table for Figure 8: Comparison of Estimated College Degree Completion Rates within 6 Years of First Enrollment, for Foster Youth and Dependent Students, as of 2009

	No degree	Certificate or Associate's degree	Bachelor's degree
Foster youth	72	15	14
Low-income dependent students	53	21	26
All other dependent students	39	15	46

Source: GAO analysis of 2008-2009 Beginning Postsecondary Students Longitudinal Study data. | GAO-16-343

Figure 9: Comparison of Degree Program Enrollment for Unaccompanied Homeless Youth and Dependent Students, By Estimated Percent Enrolled, School Year 2011-2012

	Certificate	Associate's degree	Bachelor's degree
Homeless youth	8	59	32
Low-income dependent students	7	45	48
All other dependent students	4	33	64

Source: GAO analysis of 2011-2012 National Postsecondary Student Aid Survey data. | GAO-16-343