

DEPENDENT STUDENT UNUSUAL CIRCUMSTANCES:

Unusual Circumstances refer to the conditions that justify a financial aid administrator (FAA) making an adjustment to a student's dependency status based on a unique situation, more commonly referred to as a dependency override.

A student may be experiencing unusual circumstances if they:

- Left home due to an abusive or threatening environment
- Are abandoned by or estranged from their parents and have not been adopted
- Have refugee or asylee status and are separated from their parents, or their parents are displaced in a foreign country
- Are a victim of human trafficking
- Are incarcerated, or their parents are incarcerated and contact with the parents would pose a risk to the student, or
- Are otherwise unable to contact or locate their parents and have not been adopted

DEPENDENT STUDENT UNUSUAL CIRCUMSTANCES: SUPPORTING DOCUMENTATION

Provisionally independent student is required to provide documentation to the financial aid administrator (FAA) to support their circumstances.

Acceptable documentation in support of unusual circumstances include but are not limited to:

- A documented interview between the student and the financial aid administrator (FAA)
- Submission of a court order or official Federal or State documentation that the students' parents or legal guardian(s) are incarcerated
- A documented phone call or written statement from an attorney, a guardian ad litem, a court-appointed special advocate (or similar), or a representative of a TRIO or GEAR UP program that confirms the circumstances and the person's relationship to the student
- A documented determination of independence made by a financial aid administrator at another institution in the same or a prior award year
- Utility bills, health insurance, or other documents that demonstrate a separation from parents or legal guardians

Acceptable documentation (which confirms the unusual circumstance) may also include a documented phone call with or a written statement from:

- A State, county, or Tribal welfare agency
- An independent living case worker who supports current and former foster youth with the transition to adulthood
- A public or private agency, facility, or program servicing the victims of abuse, neglect, assault, or violence

WORK SESSION

Navigating Dependent Student Circumstances & Provisional Independent Status

DEPENDENT STUDENT OTHER CIRCUMSTANCES: UNACCOMPANIED HOMELESS YOUTH

To be considered an unaccompanied homeless youth on the FAFSA form, an individual must be a youth who is either unaccompanied and homeless or unaccompanied, self-supporting, and at risk of being homeless.

- Unaccompanied – when a student is not living in the physical custody of a parent or a legal guardian
- Homeless – lacking fixed, regular, and adequate housing
- At risk of being homeless – when a student’s housing may cease to be fixed, regular, and adequate, for example, a student who is being evicted or has been asked to leave their current residence and has been unable to find fixed, regular, and adequate housing
- Self-supporting – when a student pays for his or her own living expenses, which includes paying for fixed, regular, and adequate housing

DEPENDENT STUDENT OTHER CIRCUMSTANCES: SUPPORTING DOCUMENTATION

Provisionally independent student is required to provide documentation to the financial aid administrator (FAA) to support their circumstances.

The following entities may provide documentation in support of unaccompanied homeless youth circumstances:

- A local educational agency homeless liaison, as designated by the McKinney-Vento Homeless Assistance Act, or a designee of the liaison
- The director or designee of an emergency or transitional shelter, street outreach program, homeless youth drop-in center, or other program serving individuals who are experiencing homelessness
- The director or designee of a program funded under subtitle B of title IV of McKinney-Vento (relating to emergency shelter grants)
- The director or designee of a Federal TRIO program or a Gaining Early Awareness and Readiness for Undergraduate program (GEAR UP) grant
- A financial aid administrator (FAA) at another institution who documented the student’s circumstance in the same or a prior award year

In the absence of documentation from any of the entities/individuals described above, financial aid administrators must make a case-by-case determination:

- Based upon a written statement from, or a documented interview with, the student that confirms that they are an unaccompanied homeless youth, or unaccompanied, at risk of homelessness, and self-supporting; and
- Made without regard to the reasons that the student is unaccompanied and/or homeless

PROVISIONAL INDEPENDENT STATUS

If a dependent student indicates they either have unusual circumstances or are unaccompanied and homeless, or at risk of being homeless, the **FAFSA Processing System (FPS)** will consider the student to be **provisionally independent** and will allow them to fill out the FAFSA form **as an independent student**.

The Student Aid Index (SAI) will remain provisional and not official until the student's college or career school makes a final determination. **The Institutional Student Information Record (ISIR)** will have a specific reject code that will require the financial aid administrator (FAA) to review, and if applicable, confirm the student's independent status. The FAA will determine if the student's circumstances make them eligible to apply independently and, if so, make any necessary updates to formally make the student independent.

WORK GROUP: LIFE SCENARIOS

We will be looking at situations for dependent students in what Federal Student Aid (FSA) now refers to as Unusual and Other Circumstances for Dependent Students that lead to gaining Provisionally Independent Status in connection to the FAFSA.

Below you will find life scenarios describing dependent students experiencing unusual or other circumstances. Groups are tasked with reviewing each scenario and creating questions they may have for Financial Aid Administrators (FAA's) about the scenarios as well as identifying the types of supporting documentation they believe can be provided to FAA's in processing the FAFSA.

These questions and lists of supporting documentation will be collected at the end of the session to be compiled by ACPE. This information will be shared with FAA participants after the Summit to answer questions and provide guidance regarding supporting documentation. After responses are received from FAA's, ACPE will then create and distribute a usable resource for all in attendance to refer to when they work with students for FAFSA assistance.

SCENARIO 1:

Timothy is 18 years old and moves in with a friend. He is self-sufficient for two years and doing well. Parents move out of state. Timothy's friend loses a job and moves back in with their parents. Timothy struggles to pay the full rent on his own and is at risk of being homeless. He moves in with his girlfriend's parents and decides to go to college. Timothy's parents are now completely removed and have left him on his own. They are also out-of-state and difficult to locate and contact.

SCENARIO 2:

Michael's parents took a job in another country and left him to live with a relative. Michael graduated from high school and worked for three years before deciding to enroll in a career training school. The relative marries and Michael is having a hard time with the spouse of the relative and decides to move in with a friend. Michael's parents have given a power of attorney to the relative to care for/act on behalf of him.

SCENARIO 3:

John runs away to Alaska at the age of 18, leaving behind absent alcoholic parents who also dabble in drugs. They live in the Lower 48. John who was living with friends now finds himself in a situation where he was mandated by the state to attend a residency drug rehabilitation program. He is under the guardianship of the state and is about to finish the program. John's guardians advise that he should probably not get in contact with his alcoholic/drug addicted parents for fear that he may relapse.

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SCENARIO 4:

Stacy had escalating arguments with her parents over gender identification. They got to the point where Stacy's parents will no longer support Stacy in any way (including filling out the FAFSA) unless Stacy agrees to go to counseling and accepts her biological gender. Stacy feels financially threatened, pressured, and uncomfortable in her parents' home so she moves in with a friend. Stacy's parents refuse to complete the FAFSA unless Stacy complies with their rules. Stacy believes she has unusual circumstances, which she indicates on the FAFSA.

SCENARIO 5:

Olivia's aunt had legal guardianship over her only until she turned 18. She is now 18 years old, lives with her grandparents and has not been allowed to speak with her biological parents since she was in 9th grade; they have nothing to do with her. Olivia is working on her FAFSA but she is unsure of her status, as her aunt no longer has legal guardianship over her.

SCENARIO 6:

Rachel is living with aunt and uncle who provide a place to stay but not much else. She does not have contact with her parents. How can/should she proceed with her FAFSA? No one has contact with her biological parents to get help with the FAFSA and her aunt and uncle do not have legal guardianship over her. She is not at risk of being homeless, but she just does not know where her biological parents are nor has she had any contact with them for years.

SCENARIO 7:

Caleb was in foster care since he had been 11 but was legally adopted on his 13th birthday. Caleb is filling out the FAFSA and does not know how to answer the Student Personal Circumstances section, particularly whether the statement "At any time since the student turned 13, they were in foster care" would apply to his situation.

SCENARIO 8:

Lindsay's mother passed away when she was 15. Her father has been struggling with severe depression ever since. Lindsay's father started abusing her mentally and verbally after her mother's passing and she could not take it any longer. Lindsay worked part-time while in high school and once she graduated, she got a full-time job and moved out; she shares a small apartment with two of her friends. Lindsay is self-supporting herself and wants to become a nurse. She is filing out the FAFSA and believes she has an unusual circumstance due to abusive treatment from her father. However, Lindsay was always too embarrassed to share her experiences with a school counselor and no way of proving her mental/verbal abuse but with her own word.

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