



“Working Harder Just to Be Seen and Heard:”

Barriers to Financial Aid for Homeless and Foster Youth



SchoolHouse
Connection

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Executive Summary

Approximately **4.2 million youth and young adults** experience homelessness on their own every year. These young people – referred to as “unaccompanied homeless youth” under federal education law – face unique barriers to accessing and completing higher education. Another more than **407,000 children** and youth are in the foster care system.

For both populations, lack of family and support, coupled with histories of neglect, abuse, trauma, mobility, and deep poverty, create roadblocks to their path to and through postsecondary education. Yet some form of education beyond high school remains their best opportunity for long-term stability, economic independence, health, and well-being.

Unaccompanied homeless youth are not living with, or supported by, a parent or guardian, and cannot obtain parental income information. Therefore, under the Higher Education Act, they are considered independent students and do not need to provide a parent’s signature or information about parental income on the FAFSA. Youth with experience in foster care on or after their 13th birthday also are considered independent students.

Despite this policy, these youth face barriers to higher education, including burdensome financial aid program rules that have made it more difficult for these youth to obtain federal financial assistance for college. These barriers were exacerbated by the pandemic, which brought disruption, isolation, and more economic hardship and trauma.



EXECUTIVE SUMMARY

Findings

This report examines recently released 2020-2021 federal data that help illustrate the impact of the pandemic on FAFSA completion for youth experiencing homelessness and youth with experience in foster care.

It finds that:

1

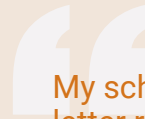
In the 2020-2021 academic year, the number of unaccompanied homeless youth (UHY) FAFSA determinations declined by almost 10% from the prior year (2019-2020). This decrease is nearly ten times greater than the percentage drop in the total number of FAFSA applications submitted in 2020-21, and the first decline in UHY determinations in five years of data collection.

2

The number of youth who requested FAFSA homeless determinations, but did not receive them by the end of the application cycle, increased by 23% from the prior year (2019-2020), and by 34% from 2018-2019. The increases in “undetermined requests for homelessness consideration” represent increases in the number of students whose homeless status remains unknown because a determination was not made in response to their requests for schools to consider their homelessness.

3

The number of FAFSA applicants who were determined to be independent because both parents were deceased, or the applicants were in foster care or dependents or wards of the court decreased by 7% from the prior year (2019-2020) – a significantly larger drop than the 1% decrease in the total number of FAFSA applications submitted in 2020-21. This continues a downward trend from previous years.



My school didn't return my financial aid letter recognizing my unaccompanied youth status until July 23, right before move-in. I had to nag heavily, and I still feel as if I didn't receive nearly as much as I deserve as an independent student and being in the situations I was in. I applied super early and it didn't help me unfortunately, but I'd still say to other youth to apply early because of things like this. I wish kids like us got more urgent help, as in **making sure we get all the financial help we need and deserve.** If anything, **students like us who yearn for an education yet are facing circumstances that may keep us from getting one, should be priority.** We constantly have to work harder than others just to be seen and heard and be granted the same opportunities.

Maya

SchoolHouse Connection Scholar
Class of 2022

EXECUTIVE SUMMARY

Recommendations

To remedy these concerning trends, we offer the following recommendations:

1

The U.S. Department of Education (ED) should act quickly to ensure robust and expeditious implementation of the homeless and foster youth provisions in the recently enacted FAFSA Simplification Act. The FAFSA Simplification Act (Public Law No: 116-260) removes many FAFSA barriers for youth experiencing homelessness and youth who have come from foster care. Congress recognized the urgency of these reforms by specifically authorizing ED to implement the homeless and foster provisions in the 2023-2024 award year. However, ED has not yet made these critical changes. ED should revise the online FAFSA for 2023-2024 immediately to ensure that it does not conflict with the new law. In addition, ED should issue strong guidance to financial aid administrators to help them comply with all of the new policies.



3

States should adopt policies to ensure FAFSA completion, including FAFSA completion laws and the designation of higher education homeless and foster liaisons. An increasing number of states are enacting state legislation to increase access to financial aid and provide additional support to youth experiencing homelessness and youth coming from foster care. These important measures can supplement federal efforts and provide direct assistance.

2

Congress should enact the Higher Education for Homeless and Foster Youth Act (HEASHFY) and the Fostering Success in Higher Education Act (FSHE). HEASHFY removes barriers to financial aid and postsecondary success by requiring institutions to post information on eligibility and processes for receiving FAFSA determinations on their websites, and by requiring the designation of higher education liaisons to connect youth to financial aid. FSHE removes barriers by appropriating funding for statewide initiatives to assist homeless and foster youth to transition to and succeed in higher education.

4

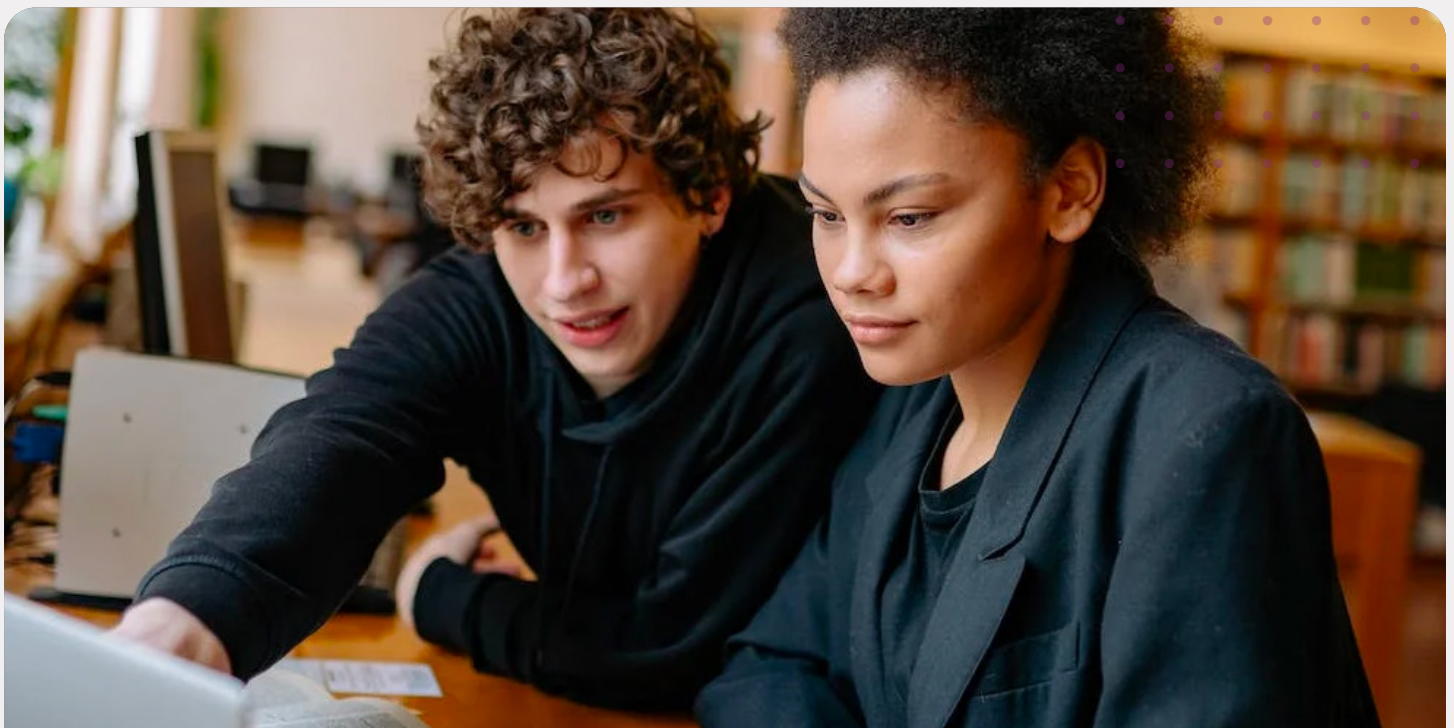
State and local education agencies, institutions of higher education, community service providers, and child welfare agencies should inform youth of their status for financial aid and help them obtain documentation, including through creative means such as awareness campaigns like FAFSA Challenges, or direct assistance through FAFSA Mentors.

Limitations of FAFSA Data on Homelessness and Foster Care

This analysis is based on data from responses to questions about homelessness and foster care on the FAFSA. These questions are asked for the sole purpose of determining independent student status. However, there are a number of other questions on the FAFSA used to determine independent status. Once an applicant provides a positive response on the online FAFSA on the Web form for any of the questions, most of the additional questions – including those for homelessness and foster care – are not presented. For example, based on the priority order of questions, homelessness questions are not presented to applicants who were 24 years or older, married, or who answered “Yes” to any of the questions about the following situations: in a graduate program, in active duty military, veteran, orphan, in foster care, ward of the court, emancipated minor, in legal guardianship, or providing more than half of a dependent’s support.

Therefore, FAFSA data on homelessness do not include applicants in any of those situations, including applicants who also may be experiencing homelessness. The FAFSA homeless data also exclude applicants who were determined to be independent by a school financial aid administrator for a special circumstance when homelessness was not specified.

In sum, the FAFSA data in this report do not represent all FAFSA applicants experiencing homelessness, nor all FAFSA applicants with experience in foster care. Rather, they describe applicants for whom their homeless or foster care status was (or would have been) the basis for being determined to be independent students. As such, they provide an important look at financial aid access for some of our nation’s most vulnerable youth, and a critical baseline against which to measure the implementation of the FAFSA Simplification Act and other initiatives to remove barriers and increase access.



Background

FAFSA completion is an important indicator of college enrollment and completion, particularly for marginalized and vulnerable students. Despite increasing skepticism about the value of higher education, it remains true that pursuing education beyond high school is the most reliable and enduring way out of poverty: [Eighty percent of “good jobs”](#) are held by workers with at least some postsecondary education. In [2021](#), the unemployment rate of individuals with only a high school degree was nearly twice that of those with a bachelor’s degree, and the median average weekly earnings for those with bachelor’s degrees was nearly 65% higher than for individuals with only a high school degree. Higher education also appears to be a protective factor against young adult homelessness: a [2019 study](#) shows four-year college enrollment to be nearly four times higher for young adults without experiences of homelessness in the prior 12 months (52% compared to 15%).

Approximately [4.2 million youth and young adults](#) experience homelessness on their own every year. These young people – referred to as “unaccompanied homeless youth” under federal education law – face unique barriers to accessing and completing higher education. In addition, another more than [407,000 children and youth](#) are in the foster care system and face similar barriers.

Yet youth experiencing homelessness and youth coming from foster care face unique barriers to accessing and completing higher education. Lack of family and support, coupled with histories of neglect, abuse, trauma, mobility, and deep poverty, create roadblocks to their path to and through postsecondary education. [Risk of homelessness](#) is higher among young people who are Black, Hispanic, or LGBTQ+, and is highest among youth who are parenting. [Racial disparities](#) also persist in foster care. While homelessness and foster care do not necessarily deprive

young people of their educational dreams and life aspirations, these experiences do pose significant impediments to pursuing them.

The pandemic has had a profound impact on the overall higher education prospects of all youth and young adults. Overall, FAFSA completions declined by about [4.8% for the high school class of 2021](#). [College enrollment also declined](#) due to COVID, rising costs, and students deciding not to pursue a postsecondary education. Early data of FAFSA completion from 2022 show a [rebound of about 4.6%](#), exceeding the past two years (2020-2021), but still falling short of the pre-pandemic FAFSA completion rates.

Recently released FAFSA data for the 2020-2021 school year for [youth experiencing homelessness](#) and [youth coming from foster care](#) suggest even greater barriers to financial aid for these vulnerable young people, and therefore more hurdles to obtaining the education that is the key to enduring stability.



Requirements for Independent Student Status for Homeless and Foster Youth

Unaccompanied homeless youth are not living with, or supported by, a parent or guardian, and cannot obtain parental income information for the FAFSA. These youth, and youth in foster care on or after the age of 13, are considered independent students under federal law, and do not need to provide a parent’s signature or information about parents’ income on the FAFSA. However, the federal higher education law that was in effect during the pandemic and through the 2022-2023 award year treats homeless youth differently than foster youth by requiring that the status of unaccompanied homeless youth be re-determined for each year in which they are submitting the application, and that it be determined by specific federal program designees, including school district homeless liaisons; directors or designees of Runaway and Homeless Youth Act

(RHYA) programs; directors or designees of Housing and Urban Development (HUD) Homeless Assistance programs; or financial aid administrators. In contrast, former foster youth are considered independent if they were in foster care at any time after turning age 13, and they are not required to have their status re-determined annually by specific designated authorities.

A 2016 U.S. Government Accountability Office (GAO) study found that these burdensome program rules hindered the ability of both homeless and foster youth to access federal supports. The recently enacted FAFSA Simplification Act, described in the recommendations section below, was designed to remove many of these barriers. However, the U.S. Department of Education has thus far failed to implement it.



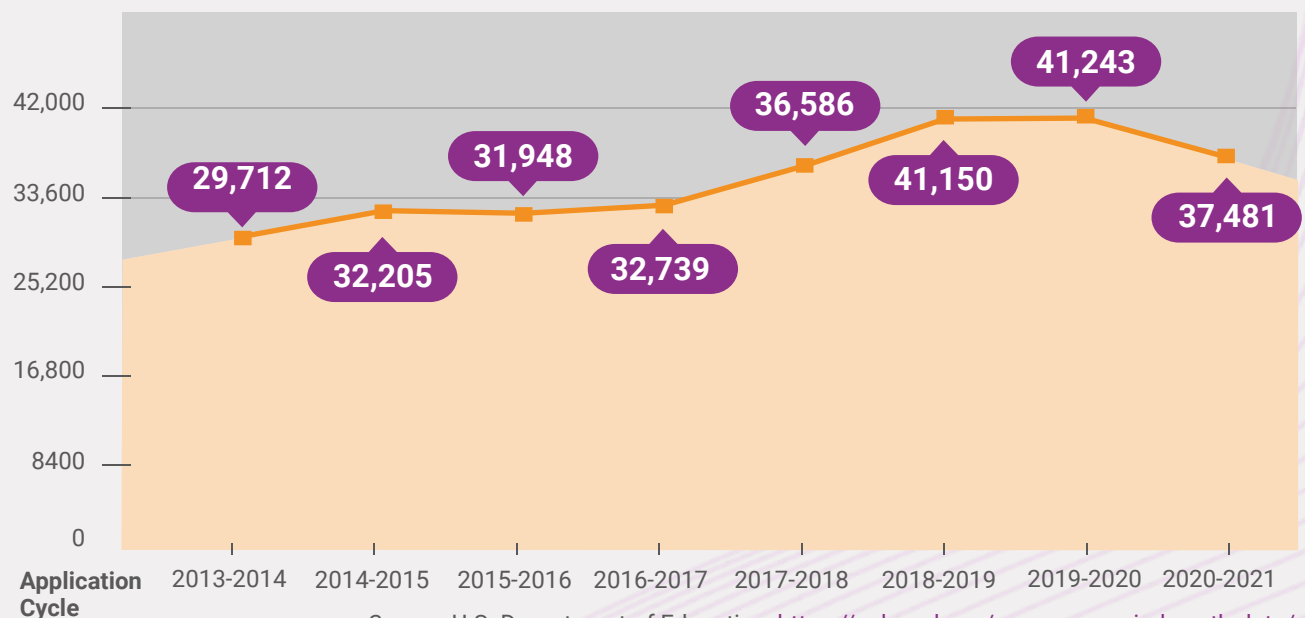
Findings

1

In the 2020-2021 academic year, the number of unaccompanied homeless youth (UHY) FAFSA determinations declined by almost 10% from the prior year (2019-2020). This decrease is nearly ten times greater than the percentage drop in the total number of FAFSA applications submitted in 2020-21, and the first decline in UHY determinations in five years of data collection.

While the number of unaccompanied homeless youth (UHY) FAFSA determinations declined by almost 10% from the prior year, [the total number of FAFSA applications](#) submitted by all students in 2020-21 decreased by only 1%, suggesting that the pandemic has had a disproportionate impact on the higher education prospects of unaccompanied homeless youth. It also represents the first overall decline in UHY determinations in five years of data collection.

Applicants Determined to be Unaccompanied Homeless Youth



Source: U.S. Department of Education, <https://nche.ed.gov/unaccompanied-youth-data/>

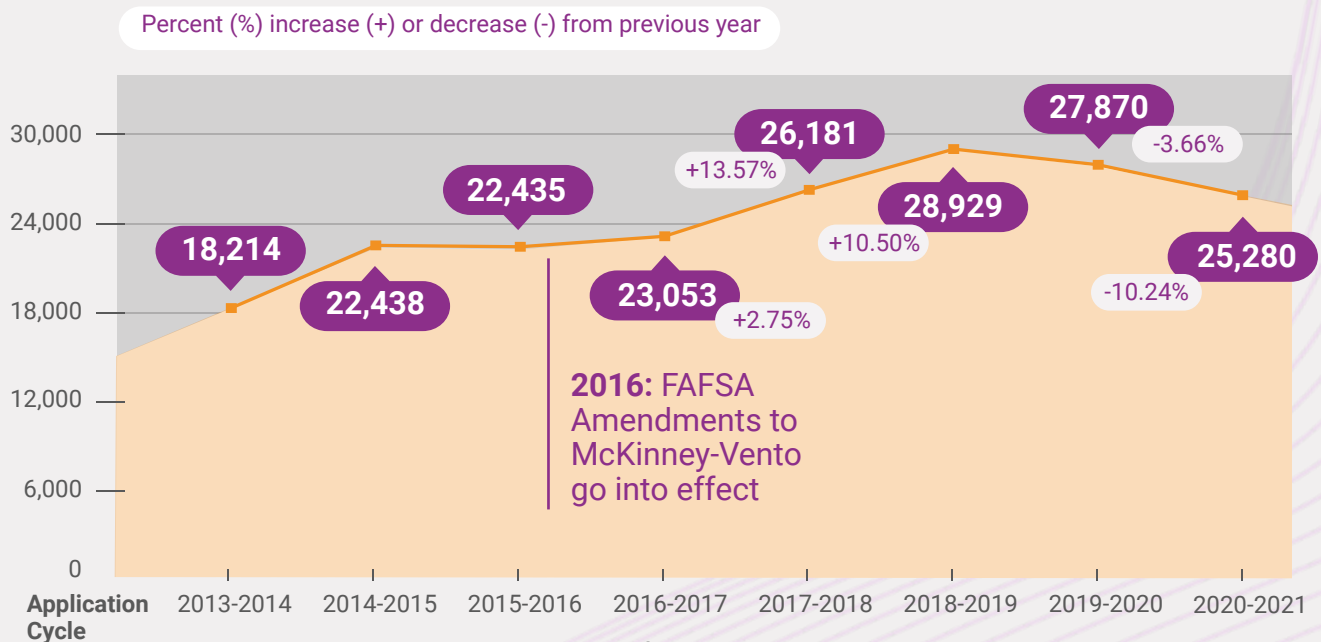
While 2020-2021 determinations decreased for all entities authorized to make homeless youth FAFSA determinations, there is no indication that youth homelessness itself decreased during the first full year of the pandemic. To the contrary, schools and service providers described [heightened needs](#) due to increased homelessness.

The greatest decrease among authorized entities was from HUD homeless assistance programs, which dropped by 15% from the previous year. Determinations from RHYA programs decreased by 7%. These drops may reflect the fact that many shelters and homeless programs closed or reduced capacity during the pandemic, and youth were even more fearful of seeking shelter.

Homeless youth FAFSA determinations from high school homeless liaisons continue to comprise a large majority of all homeless youth determinations (67%). However, determinations from school district liaisons declined by 9% in 2020-2021. These drops, too, likely result from the pandemic: during virtual learning and school building closures. Many homeless liaisons and counselors lost contact with youth experiencing homelessness, or faced difficulties identifying and staying in touch with them, and many youth experiencing homelessness disengaged from school.

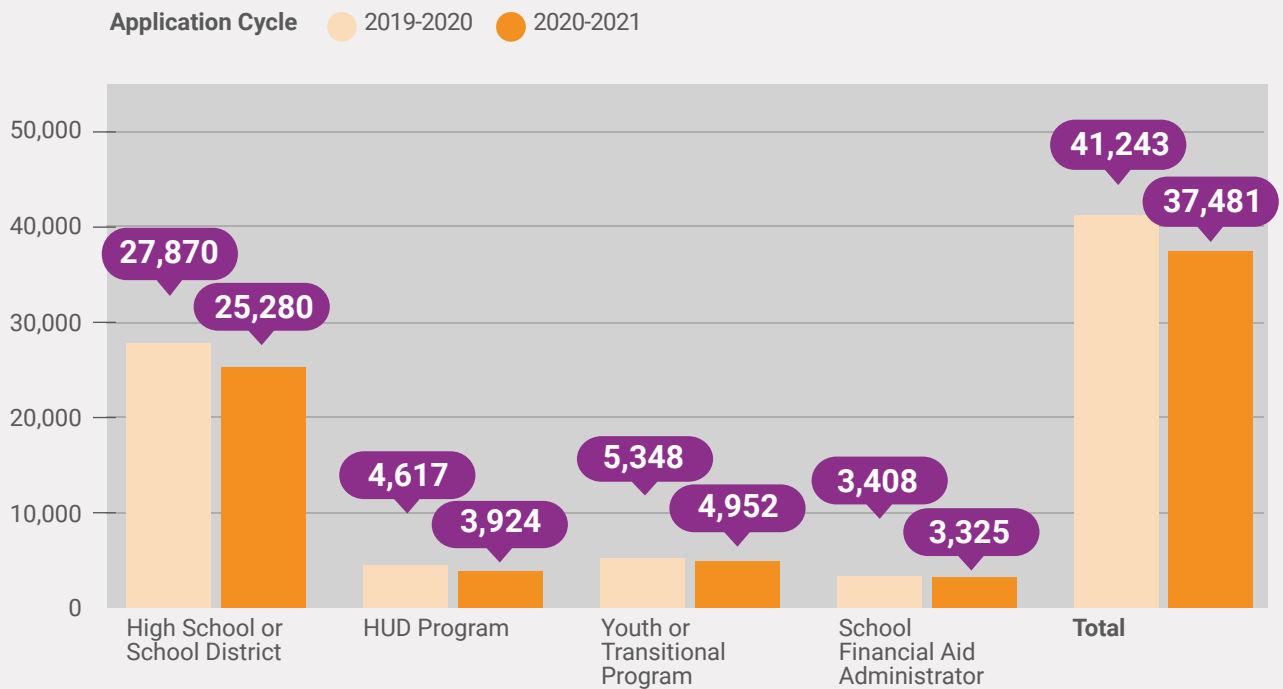
The pandemic and related challenges appear to have rolled back the steady progress that had been made in homeless youth determinations subsequent to amendments to the McKinney-Vento Act made in 2016. These amendments required local educational agency homeless liaisons to inform unaccompanied homeless youth of their status as independent students for financial aid, and assist them to obtain documentation. FAFSA UHY data showed the likely impact of the 2016 amendments, as the number of high school UHY FAFSA determinations increased significantly between 2016 and 2019 before it began to decline in 2020.

Unaccompanied Homeless Youth Determinations by School District Liaisons



Only nine states (DE, HI, IA, IN, NE, OK, RI, TN, WY) did not show a decline in the number of UHY determinations in 2020-2021. (See Appendix A).

Unaccompanied Homeless Youth Determinations by Authorized Entity



Source: U.S. Department of Education, <https://nche.ed.gov/unaccompanied-youth-data/>

2

The number of youth who requested FAFSA homeless determinations, but did not receive them by the end of the application cycle, increased by 23% from the prior year (2019-2020), and by 34% from 2018-2019.

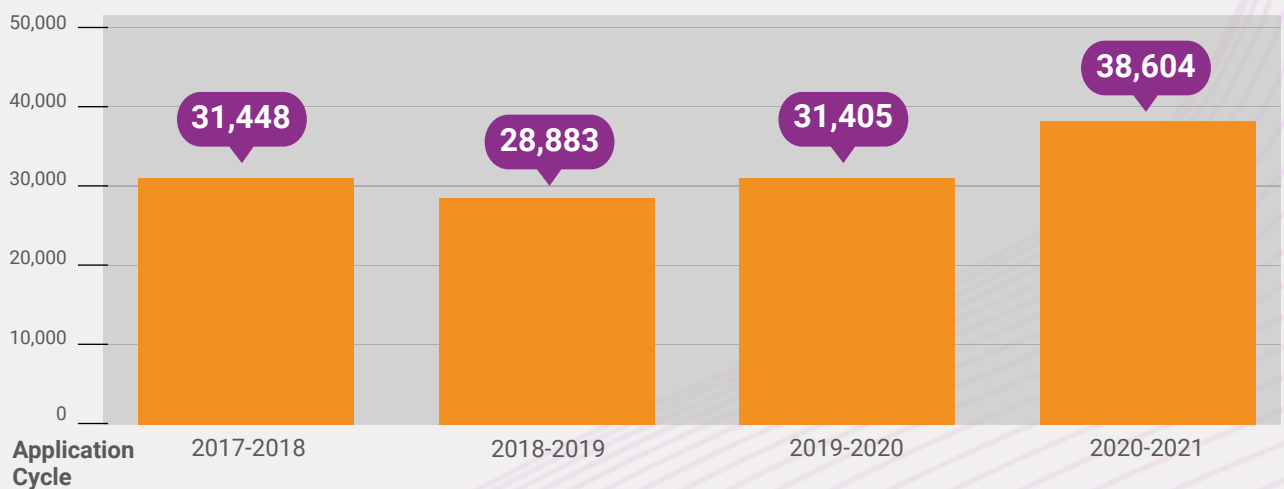
The increases in “undetermined requests for homelessness consideration” represent increases in the number of students whose homeless status remains unknown because a determination was not made in response to their requests for schools to consider their homelessness. According to the U.S. Department of Education, “Reasons for this are unknown, but could include not attending or following up with the school, or not being determined as an unaccompanied homeless youth.”

SchoolHouse Connection’s experience – both with the young people served directly in its Youth Leadership and Scholarship program, and with the network of educators and service providers working directly with young people – is that the pre-existing barriers to receiving determinations from financial aid administrators (FAAs) were exacerbated greatly by

the pandemic. Federal guidance allows FAAs to make homeless youth determinations based on documented interviews, and advises against burdensome documentation requirements. Yet homeless youth continue to be asked by FAAs to obtain documents substantiating their homelessness and the reasons for their estrangement from parents. Communications challenges during virtual learning, as well as increased mobility and deprivation experienced by students, made it even harder for youth to produce required documentation. In addition, young people struggled to find safe and private spaces to take part in Zoom meetings, especially on sensitive topics like their homeless status for FAFSA. Many young people were staying with others temporarily, or in shelters, where there were no private spaces. Youth staying in motels, uninhabitable buildings, cars, or outside struggled without internet access, and thus were forced to resort to public spaces, such as fast food chains, where there was no privacy to have discreet conversations. In addition, more youth may have experienced homelessness in 2020-2021, and requested determinations that ultimately were not made.

While homeless youth determinations from FAAs only declined by 2% in 2020-2021, FAAs continue to make the fewest FAFSA homeless youth determinations of all authorized parties: in 2020-2021, FAAs made only 8% of the total number of determinations. This is concerning because many youth are not identified as homeless in high school, and most do not stay at HUD or RHYA homeless programs. They are therefore unable to obtain FAFSA determinations from high school liaisons, or HUD or RHYA providers. Financial aid administrators are often the only parties who are able to make determinations for them. It would be expected then, that of all the parties authorized to make youth homelessness determinations, FAAs would make the greatest number of determinations, not the fewest. More intensive training and oversight is needed to ensure that FAAs make appropriate homeless youth FAFSA determinations and do not impose unnecessary barriers that prevent students from obtaining these determinations.

Undetermined Unaccompanied Homeless Youth Requests by Year



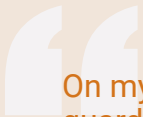
Source: U.S. Department of Education, <https://nche.ed.gov/unaccompanied-youth-data/>

3

The number of FAFSA applicants who were determined to be independent because both parents were deceased, or because applicants were in foster care, or were a dependent or ward of the court, decreased by 7% from the prior year (2019-2020) – a significantly larger drop than the 1% decrease in the total number of FAFSA applications submitted in 2020-21.

Nationwide, overall foster care numbers dropped dramatically in the first months of the pandemic. There were 426,566 children in the child welfare system in September 2019, but that number [dropped to 407,493](#) one year later. Rather than resulting from a decrease in abuse or neglect, this decrease in the number of children in foster care may have resulted from the closure of school buildings and other locations where children are typically observed by mandated reporters.

The decrease in the number of youth whose independent FAFSA student status was based on experience in foster care continued a trend from previous years. The overall number of FAFSA applicants who were determined to be independent because both parents were deceased, or because the applicants were in foster care, or were dependents or wards of the court, has declined by [over 35%](#) since 2013-2014, compared to a [16% drop](#) in the total number of FAFSAs submitted by all students over the same time period. The inability of youth with little to no safety net to afford the rising costs of college, and the perceived immediacy of the benefit of working compared to pursuing higher education, may help explain this significantly higher percentage decline for foster youth.



On my first attempt at completing the FAFSA, I recognized myself as having legal guardians. However, after being asked for supporting documents to prove I was under the supervision of legal guardians, I realized that in the state of Louisiana, legal guardianship and legal tutorship are not the same thing. For that reason I had to redo my FAFSA – but this time, I recognized myself as an orphan, since both of my biological parents have passed. This was challenging as well, because I had to submit supporting documents to my university. The process of retrieving death certificates for my parents was a long, stressful, and expensive process. **Overall I am not a fan of the FAFSA, for it is a very stressful process for minimal funding.**

Conrad

SchoolHouse Connection Scholar
Class of 2022

Recommendations

1

The U.S. Department of Education (ED) should act quickly to ensure robust and expeditious implementation of the homeless and foster youth provisions in the recently enacted FAFSA Simplification Act.

[The FAFSA Simplification Act \(Public Law No: 116-260\)](#) removes many FAFSA barriers for youth experiencing homelessness and coming from foster care. Congress recognized the urgency of these reforms by specifically authorizing ED to implement the homeless and foster provisions in the 2023-2024 award year. However, ED has not yet made these critical changes. ED should revise the online FAFSA for 2023-2024 immediately, at a minimum ensuring that it does not conflict with the new law. In addition, ED should issue strong guidance to financial aid administrators to help them comply with all of the new policies.

Key provisions of the FAFSA Simplification Act include:

- Homeless and foster care status does not need to be redetermined every year. Under the FAFSA Simplification Act, any student who is determined to be an unaccompanied homeless youth or a former foster youth for a preceding award year is presumed to be independent for each subsequent year the student is at the same institution.
- More officials and programs are authorized to make unaccompanied homeless youth determinations, increasing access to financial aid. Authorized entities include:
 - School district homeless liaisons or their designees
 - The director, or a designee of a director, of an emergency or transitional shelter, street outreach program, homeless youth drop-in center, or other program serving individuals who are experiencing homelessness
 - The director, or a designee of a director, of a program funded under a TRIO or Gaining Early Awareness and Readiness for an Undergraduate program (“GEAR UP”) grant
 - A financial aid administrator at the current institution or at another institution who previously made a determination
- Determinations of unaccompanied homeless youth and foster youth status must be made as quickly as practicable, and not later than 60 days after the date of the student’s enrollment during the award year for which the student initially submits an application. Determinations may be made as early as the year before the award year for which the student initially submits an application

- Financial aid administrators must consider and accept documentation from one of the entities who are authorized to verify a youth’s status as an unaccompanied homeless youth, unless there is “documented conflicting information.”
- The determinations of unaccompanied homeless youth status made by financial aid administrators for youth who cannot get determinations from other authorities must be based solely on the legal definitions of unaccompanied homeless youth, and without regard to why the youth is experiencing homelessness.
- If an institution requires documentation that a student was in foster care when the student was age 13 or older, the financial aid administrator must accept a wide range of documents.

Learn more about the [FAFSA Simplification Act’s provisions on homelessness and foster care](#).

“My homeless student verification form was **always a hassle**. Especially this semester, and my first semester. My high school told me they weren’t allowed to do mine after I graduated.

Eric
SchoolHouse Connection
Scholar, Class of 2021

2

Congress should enact the Higher Education for Homeless and Foster Youth Act (HEASHFY) and the Fostering Success in Higher Education Act (FSHE).

While the FAFSA Simplification Act directly amended the Higher Education Act’s provisions for financial aid for youth experiencing homelessness and youth coming from foster care, a number of [other important bills](#) have been introduced that would increase postsecondary access and success for youth experiencing homelessness and youth coming from foster care.

Two of these bills would improve access to financial aid. [The Higher Education Access and Success for Homeless and Foster Youth Act](#) (HEASHFY) removes barriers to financial aid and postsecondary success by requiring institutions to post information on eligibility and processes for receiving FAFSA determinations on their websites, and by requiring the designation of higher education liaisons to connect youth to financial aid. [The Fostering Success in Higher Education Act](#) removes barriers by appropriating funding for statewide initiatives to assist homeless and foster youth to transition to and succeed in higher education.

These bills should be reintroduced and enacted in the next Congress.

3

States should adopt policies to ensure FAFSA completion, including graduation FAFSA completion laws and the designation of higher education homeless and foster liaisons.

An increasing number of states are enacting state legislation to increase access to financial aid and provide additional support to youth experiencing homelessness and youth coming from foster care. These important measures can supplement federal efforts and provide direct assistance.

Currently, nine states mandate FAFSA completion and six other states have introduced similar legislation (see Appendix B). It is imperative that state FAFSA completion laws place appropriate responsibility on schools for ensuring FAFSA completion, rather than penalizing students who are unable to complete the FAFSA. This is particularly important for unaccompanied homeless youth and youth with experience in foster care, who may face particular difficulties completing the FAFSA because they may not be aware of their special status as youth experiencing homelessness or as a youth in foster care any time after turning 13. These youth need extra assistance in FAFSA completion. When implementing FAFSA completion legislation, states should ensure that schools do not automatically opt out youth experiencing homelessness or foster care simply because they do not have access to parental information, or because their FAFSA processes are different from other students. Schools should inform youth experiencing homelessness or from foster care who do choose to opt out of FAFSA completion that they can apply for the FAFSA in future years, and that opting out in high school does not preclude them from pursuing higher education later. States also can improve FAFSA completion, and access to higher education generally, by enacting legislation to provide targeted assistance to homeless and foster youth. California, for example, recently enacted [SB 860](#), which ensures that an individual is identified to assist youth in foster care complete the FAFSA.

Louisiana was the first state to enact legislation mandating FAFSA completion; every year since implementation, the numbers of unaccompanied homeless youth determinations increased, until last year. While other states with FAFSA completion laws or programs saw declines in homeless youth FAFSA determinations in 2020-2021, their laws are all very new and implementation will begin this fall.

New laws are not necessarily needed for states to successfully encourage FAFSA completion, however. For example, the District of Columbia initiated [a FAFSA completion initiative](#) to facilitate a higher FAFSA completion rate. We are hopeful that states will prioritize and provide the necessary tailored support to help youth experiencing homelessness fill out the FAFSA, so that FAFSA completion requirements assist these youth, rather than creating new barriers.

States also have enacted policies designating [homeless higher education liaisons](#). These individuals are analogous to the K12 system’s McKinney-Vento liaisons, and they connect students to available resources on and off-campus, removing barriers to their college

retention and success, and assisting with financial aid. Nine states (AR, CA, FL, IL, LA, ME, MD, NV, TN) have enacted laws that allow or require the designation of a homeless higher education liaison, and four states (AK, CA, LA, ME) specifically outline the liaison’s responsibility to help students navigate financial aid.

To learn more about other state policies for supporting college students experiencing homelessness, see [SHC’s summary of state laws](#).

4

State and local education agencies, institutions of higher education, community service providers, and child welfare agencies should inform youth of their status for financial aid and help them obtain documentation.

A number of states and communities have undertaken unique and innovative strategies to increase access to financial aid for youth experiencing homelessness and youth with experience in foster care, including through awareness campaigns or direct assistance.

For example, John Burton Advocates for Youth (JBAY) has hosted the Foster Youth FAFSA Challenge since 2017. The Foster Youth FAFSA Challenge is a statewide campaign to increase the number of foster youth who are prepared for college by ensuring that they are accessing financial aid. JBAY provides technical assistance to county-based [Foster Youth Services Coordinating Programs](#) (FYSCP), which work with local partners to help youth complete the FAFSA. This year, SchoolHouse Connection is partnering with JBAY for the first of its kind [Homeless FAFSA Challenge](#) in California. This challenge provides training and technical assistance with participating counties of education and local education agencies; support with data collection and tracking; and resources to identify and assist homeless youth filling out the FAFSA. SchoolHouse Connection hopes to help to replicate this initiative in other states across the country.

In addition, a record \$800 million was included in the American Rescue Plan to identify and support the education of children and youth experiencing homelessness. Some school districts are using these funds to increase postsecondary support, including assistance filling out the FAFSA. For example, the homeless education program in Frederick County in Maryland created a [FAFSA Mentor Program](#) which helps students complete the FAFSA and research scholarship options. Other schools are creating Graduation Coach positions that also assist students with the FAFSA and develop a plan for after graduation, whether it is pursuing a postsecondary education, joining the workforce, enlisting in the military, or another option. Schools can use their [American Rescue Plan-Homeless Children and Youth \(ARP-HCY\) funds](#) or their McKinney-Vento, or Title I Part A to support these roles.

To review more resources, tools, and best practices for helping youth experiencing homelessness fill out the FAFSA, see [here](#).

Appendix A

State-by-State Data on Unaccompanied Homeless Youth FAFSA Determinations

State	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021
AK	137	161	138	136	140	131	122	117
AL	378	403	391	451	457	521	422	367
AR	262	276	270	308	345	429	422	367
AZ	588	670	671	600	817	866	864	790
CA	3,432	3,697	3,660	3,871	4,584	5,674	5,945	5,381
CO	543	576	631	626	680	702	670	635
CT	190	171	203	205	212	259	226	206
DC	103	127	119	126	141	130	142	139
DE	97	94	104	97	98	105	83	89
FL	1,537	1,794	1,853	1,991	2,179	2,559	2,546	2,318
GA	813	966	960	939	1,085	1,235	1,237	1,176
HI	52	62	41	36	45	49	51	67
IA	226	255	280	269	324	326	310	312
ID	186	173	172	201	240	257	289	266
IL	2,084	2,336	2,222	2,104	2,203	2,338	2,328	2,000
IN	440	483	463	461	524	559	507	514
KS	247	271	311	307	307	320	359	343
KY	281	344	302	362	403	455	407	401
LA	419	421	492	523	573	685	686	614
MA	547	559	556	565	583	694	689	608
MD	444	538	558	601	688	815	818	748
ME	201	247	201	232	241	254	249	222

Appendix A (continued)

MI	1,582	1,617	1,707	1,626	1,720	1,830	1,848	1,618
MN	526	526	515	514	584	679	622	526
MO	1,020	1,108	1,153	1,227	1,424	1,442	1,384	1,222
MS	192	193	212	217	225	289	278	242
MT	60	90	88	109	138	168	156	147
NC	824	877	824	900	982	999	1,016	920
ND	46	43	38	44	71	71	62	59
NE	164	165	158	165	194	183	197	203
NH	123	133	139	107	132	150	135	94
NJ	405	461	426	430	448	600	618	448
NM	189	184	223	225	255	253	282	246
NV	291	323	335	304	337	356	365	338
NY	1,235	1,317	1,245	1,206	1,246	1,456	1,527	1,335
OH	845	814	784	815	878	878	895	773
OK	385	400	412	457	530	593	577	581
OR	1,194	1,112	1,001	1,117	1,233	1,255	1,262	1,151
PA	650	683	745	737	785	928	882	823
RI	59	48	53	45	55	52	60	61
SC	283	345	301	305	365	400	374	300
SD	40	41	50	40	32	50	40	35
TN	448	487	533	536	626	731	785	854
TX	2,918	3,400	3,397	3,535	4,107	4,615	4,622	4,280
UT	114	137	158	187	227	243	254	187
VA	447	563	506	543	536	534	529	457
VT	51	68	40	45	45	55	62	51
WA	1,477	1,475	1,427	1,428	1,535	1,845	1,808	1,703

Appendix A (continued)

WI	544	523	465	461	557	629	596	522
WV	148	189	155	188	233	224	261	241
WY	37	46	52	64	86	105	109	133
Other	208	213	208	151	131	174	195	140

Appendix B

State-by-State Data on Foster Youth FAFSA Determinations

*Missing FAFSA data on Foster Youth from 2017-2018

State	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018*	2018-2019	2019-2020	2020-2021
Total	141,391	130,339	122,300	114,500		109,256	97,670	90,890
AK	337	316	295	282		306	276	266
AL	2,037	1,978	1,895	1,955		1,868	1,602	1,551
AR	1,160	1,147	1,120	1,060		1,094	1,021	940
AZ	2,850	2,719	2,650	2,627		2,897	2,715	2,581
CA	25,895	24,253	22,727	21,117		19,785	18,077	16,550
CO	1,783	1,528	1,481	1,414		1,303	1,183	1,083
CT	1,753	1,552	1,461	1,329		1,269	1,071	963
DC	586	523	429	366		293	221	195
DE	339	286	301	261		258	260	229
FL	6,955	6,422	6,231	5,968		5,812	5,357	5,036
GA	4,239	3,843	3,572	3,286		3,110	2,787	2,755
HI	654	604	512	446		399	346	312
IA	1,483	1,371	1,259	1,204		1,185	958	891
ID	533	460	461	393		386	330	296
IL	5,288	4,779	4,241	3,824		3,406	2,795	2,567
IN	2,881	2,693	2,492	2,363		2,315	2,127	2,069
KS	1,558	1,489	1,468	1,366		1,419	1,250	1,276
KY	3,057	2,888	2,688	2,423		2,459	2,259	2,204
LA	1,588	1,608	1,491	1,524		1,618	1,484	1,397
MA	3,357	3,077	2,885	2,771		2,532	2,324	2,120
MD	3,103	3,015	2,705	2,342		2,010	1,639	1,432

Appendix B (continued)

ME	417	394	377	364		349	299	272
MI	5,463	4,748	4,202	3,854		3,505	3,060	2,700
MN	1,995	1,711	1,559	1,420		1,385	1,224	1,184
MO	2,889	2,565	2,433	2,388		2,284	2,024	1,883
MS	1,280	1,220	1,201	1,200		1,251	1,086	1,010
MT	330	269	275	292		296	295	275
NC	3,553	3,189	3,093	2,831		2,694	2,365	2,292
ND	310	272	249	276		300	238	268
NE	1,397	1,158	1,142	1,013		939	799	716
NH	413	299	321	293		292	242	209
NJ	3,087	2,801	2,667	2,410		2,254	1,995	1,743
NM	631	596	537	534		599	510	417
NV	1,089	1,128	1,046	902		894	806	777
NY	6,725	6,212	5,710	5,224		4,687	4,128	3,800
OH	4,749	4,266	3,872	3,689		3,278	3,012	2,775
OK	1,373	1,311	2,014 1,367	1,454		1,347	1,201	1,144
OR	2,772	2,408	2,140	2,014		1,817	1,623	1,451
PA	5,467	4,851	4,405	4,003		3,783	3,235	3,073
RI	559	511	494	443		375	327	292
SC	1,762	1,593	1,550	1,422		1,406	1,233	1,148
SD	256	234	223	220		198	171	176
TN	3,812	3,654	3,581	3,356		3,473	3,134	2,888
TX	7,810	7,304	7,056	7,033		7,191	6,713	6,327
UT	1,004	878	892	807		753	645	601
VA	3,145	2,906	2,663	2,450		2,171	1,863	1,719
VT	264	251	238	218		186	174	171

Appendix B (continued)

WA	2,906	2,758	2,566	2,313		2,273	2,005	1,846
WI	1,804	1,590	1,481	1,307		1,282	1,118	1,113
WV	1,012	980	981	990		1,070	985	988
WY	293	283	269	266		292	247	263
Other	1,388	1,448	1,346	1,193		908	831	656

Appendix C

State Legislation on FAFSA Completion

Enacted State Laws Mandating FAFSA Completion for High School Graduation

State	Effective Date	Policy Source
LA	SY 2017-18	SCR 95 - Requires FAFSA completion for graduation, includes opt-out
TX	SY 2021-22	HB3 of 2019 - Requires FAFSA and TAFSA completion, includes opt-out
IL	SY 2020-21	PA 101-1080 - Requires FAFSA completion, includes opt-out
CA	SY 2022-23	AB 469 - Requires FAFSA/CADAA completion as a graduation requirement, includes opt-out
AL	SY 2021-22	State Board of Education Rule - Requires FAFSA completion, includes waiver
CO	SY 2021-22 to 2024-2025	HB19-1187 & HB22-1366 - Creates grant program
NH	SY 2023-24	SB 147 - Requires FAFSA completion, includes opt-out
IN	SY 2022-2023	PL 51 of 2022 (SB 82) - Requires FAFSA completion with non-public schools allowed to choose who to give it to, includes opt-out
MD	SY 2022-23	7-212 - Request FAFSA or MDSAA completion, includes opt out

Appendix C (continued)

Introduced State Laws Mandating FAFSA Completion for High School Graduation

State	Current Status	Policy Source
HI	Passed the Senate in 2021 and was carried over to the House for the 2022 session, where it still sits.	SB 245 - Establish a working group to create a statewide plan to make FAFSA completion, or an opt-out, a graduate requirement by the 23-24 school year.
NY	Was introduced in Jan. 2021. Both versions are sitting in committee.	A 361/S 5409 - Requires FAFSA completion, with opt-out
SC	Introduced in Jan. 2021-22 session and passed the House. Currently in the Senate Ed Committee.	H361- Requires FAFSA completion, with opt-out
MI	Introduced in 2019 but did not advance.	HB 4614 - Requires FAFSA completion, with opt-out
NE	Vetoed in 2020.	LB1089 - Requires FAFSA completion as graduation requirement
FL	Both Senate and House bills did not advance through committee in March 2022.	SB 698/HB979 - Requires FAFSA completion, includes opt-out