



MEMORANDUM

March 10, 2009

To: Honorable David Wu
Attention: Elsa Tung

From: Cassandra Dortch
Analyst in Education Policy
202-707-0376

Subject: Asian American and Native American Pacific Islander Serving Institutions

This memorandum was prepared pursuant to your request for information regarding the number of institutions potentially eligible to receive grants under the Assistance to Asian American and Native American Pacific Islander-Serving Institutions Program. The Program is authorized by the Higher Education Act of 1965 (HEA), as amended by the Higher Education Opportunity Act (Public Law 110-315) (HEOA) enacted on August 14, 2008.

Under Title III, Section 320 of the HEA, an institution would be eligible to receive a grant if it had an enrollment of undergraduate students that is at least 10 percent Asian American and Native American Pacific Islander (AANAPI). Asian Americans are defined as “person[s] having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.”¹ Native American Pacific Islander is defined as “any descendant of the aboriginal people of any island in the Pacific Ocean that is a territory or possession of the United States.”² In addition to the percentage of AANAPIs, the institution must also satisfy basic eligibility requirements as specified in Title III, Section 312(b) of the HEA.³ According to Section 312(b), basic eligibility is met by institutions that:

- have low educational and general expenditures (E&G);⁴

¹ Office of Management and Budget’s Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity as published on October 30, 1997 (62 Federal Register 58789).

² HEOA Title III, Section 307.

³ The HEA Title III,

Section 312(b) eligibility requirements are also applicable to Title V of the HEA.

⁴ There are several waivers available for institutions that do not meet the Section 312(b) requirements for low educational and general expenditures. Institutions seeking a waiver of the low E&G requirements must submit evidence that is both persuasive (continued...)

- have a requisite enrollment of needy students;
- are legally authorized within their respective state to award bachelors degrees or are a community college; and
- are accredited by a nationally or state recognized accrediting agency.

An institution is considered to have met the enrollment of needy students criterion if (1) at least 50% of its degree-seeking students receive financial assistance under one or more of the following programs: Federal Pell Grant Program, Federal Supplemental Educational Opportunity Grant Program, Federal Work-Study Program and/or the Federal Perkins Loan Program or (2) the percentage of its undergraduate degree-seeking students who were enrolled at least half-time and received a Federal Pell Grant met or exceeded the average for similar institutions.

As you requested, we have constructed a list of institutions that are potentially eligible for AANAPI grants. To do so, we have drawn on the only publicly available data source we have been able to locate that lists institutions meeting the aforementioned Section 312(b) basic eligibility criteria. Lists of such institutions have been posted by the U.S. Department of Education (ED). ED has posted two lists that present a combined total of 1,325 institutions designated as eligible for new grants under any of the Title III, Part A Programs and the Title V, Developing Hispanic Serving Institutions Program⁵ in Fiscal Year 2005 and designated as eligible for the waiver of the non-federal share matching requirements for the same programs in Fiscal Year 2008.⁶ These are the most recent lists of eligible institutions available publicly.⁷ We have used Integrated Postsecondary Education Data System (IPEDS) data to identify institutions with at least 10 percent Asian or Pacific Islander⁸ (API) undergraduate enrollment and then matched these institutions with those ED has identified as having met Section 312(b) basic eligibility criteria. A list of 568 Title IV eligible postsecondary institutions⁹ with at least 10 percent API

(...continued)

and compelling to have this requirement waived.

⁵ Title V of the HEA, the Developing Hispanic Serving Institutions Program, provides grants to institutions that expand educational opportunities for and improve the academic attainment of Hispanic students and that expand and enhance the academic offerings, program quality, and institutional stability of institutions that are helping large numbers of Hispanic students and other low-income individuals complete postsecondary degrees. To qualify as a Hispanic Serving Institution (HSI) for the purposes of Title V, an institution must have undergraduate full-time equivalent enrollment of at least 25 percent Hispanic students and meet the same Title III, Section 312(b) basic eligibility requirements.

⁶ The first list for regular eligibility is available at <http://www.ed.gov/about/offices/list/ope/idades/t3eligibleinstitutions2005.pdf>, and the second list for institutions eligible for the waiver of the non-federal share matching requirements is available at <http://www.ed.gov/about/offices/list/ope/idades/t3t5-eligibles-2008.pdf> as of March 5, 2009.

⁷ OPE requests that institutions seeking designation as Title III and/or Title V eligible submit verification that the institution satisfies the aforementioned eligibility criteria every five years.

⁸ IPEDS defines Asian or Pacific Islander as a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian Subcontinent, or the Pacific Islands. This includes people from China, Japan, Korea, the Philippine Islands, American Samoa, India, and Vietnam. Students may be counted in only one category for race/ethnicity, which includes unknown; thus, these numbers are only estimates.

⁹ A Title IV eligible postsecondary institution must be one of the following: (1) an institution of higher education (public or private, non-profit control), (2) a proprietary institution (private for-profit control), or (3) a postsecondary vocational institution (public or private, non-profit control). In addition, it must meet the criteria in HEA for acceptable legal authorization, acceptable accreditation and admission standards, eligible academic program(s), administrative capability, and financial responsibility.

undergraduate enrollment was created from IPEDS, using the 2007 schools universe and Fall 2006 enrollment data for total undergraduates and total undergraduates who are Asian or Pacific Islander. We identified 116 institutions that appear on both lists or are specifically indicated as eligible in Title III, Section 312(b). These 116 institutions are presented below in **Table 1**.

It is important to note that the list of potentially eligible institutions in **Table 1** is not a definitive list since only institutions that have previously applied for eligibility for Title III and Title V programs are included. Some institutions that have not applied for eligibility under the Title III and Title V programs may be able to meet the eligibility criteria. Additional institutions may seek to establish eligibility or may become eligible as their financial circumstances and student populations change. Additionally, because institutional enrollment numbers change annually and institutions must certify—at the time of submitting an application—that they meet the minimum enrollment requirements, this list only represents those institutions that met the enrollment requirement for academic year 2006-2007.

You also requested that we indicate whether the institutions, which are potentially eligible for AANAPI grants, might also be eligible for other minority-serving institutions' grant programs in the HEA. As a result, **Table 1** indicates which institutions may also be eligible for the

- Alaska Native and Native Hawaiian Serving Institutions Program (ANNH), Section 317, for which institutions are eligible that meet basic eligibility under Title III, Section 312(b) and serve at least 20 percent Alaska Native students or at least 10 percent Native Hawaiian students;¹⁰
- Predominately Black Institutions Program (PBI), Section 318, for which institutions are eligible that meet basic eligibility under Title III, Section 312(b) and serve at least 40 percent Black American students; or
- Title V, Developing Hispanic Serving Institutions Program, for which institutions are eligible that meet basic eligibility under Title III, Section 312(b) and serve at least 25 percent Hispanic students.

¹⁰ Eligibility was determined by the lists of actual grantees from 2003 through 2008 as obtained from the U. S. Department of Education at <http://www.ed.gov/programs/idadesannh/awards.html> as of March 5, 2009. Data are not generally available for the enrollment of Alaska Native or Native Hawaiian students separate from the larger American Indian or Alaska Native and Asian or Pacific Islander ethnic groups.

Table I. Postsecondary Institutions with a Minimum 10 Percent Asian or Pacific Islander Enrollment That Have Satisfied HEA, Title III, Section 312(b) Eligibility Requirements or Received a Waiver

#	State	Institution	Percentage AANAPI Enrolled (Fall 2006)	Actual ANNH Grantee (2003-2008)	PBI Eligible (Fall 2006)	Title V Eligible (Fall 2006)
1	AS	American Samoa Community College	89			
2	CA	American River College	12			
3	CA	Berkeley City College	15			
4	CA	Cal State University - Fresno	14			✓
5	CA	Cal State University - Los Angeles	20			✓
6	CA	Cal State University, Northridge	12			✓
7	CA	California State Polytechnic University Pomona	30			✓
8	CA	California State University Long Beach	23			✓
9	CA	California State University San Marcos	12			
10	CA	California State University, East Bay	30			
11	CA	California State University, Fullerton	23			✓
12	CA	California State University, Sacramento	20			
13	CA	California State University, Stanislaus	12			✓
14	CA	Canada College	14			✓
15	CA	Cerritos College	13			✓
16	CA	Chabot College	30			
17	CA	Citrus Community College	10			✓
18	CA	Coastline Community College	21			
19	CA	College of Alameda	37			
20	CA	Cosumnes River College	31			
21	CA	Cypress College	27			✓
22	CA	De Anza Community College	37			
23	CA	East Los Angeles College	15			✓
24	CA	El Camino College	16			✓
25	CA	Evergreen Valley College	41			✓
26	CA	Fresno City College	10			✓
27	CA	Glendale Community College	15			
28	CA	Heald College Schools of Business and Technology, Milpitas	22			✓
29	CA	Heald College Schools of Business and Technology, Rancho Cordova	14			

#	State	Institution	Percentage AANAPI Enrolled (Fall 2006)	Actual ANNH Grantee (2003-2008)	PBI Eligible (Fall 2006)	Title V Eligible (Fall 2006)
30	CA	Heald College, Schools of Business and Technology, San Francisco	24			
31	CA	Heald College, Schools of Business and Technology, Stockton	13			
32	CA	Holy Names College	12			
33	CA	La Sierra University	24			✓
34	CA	Laguna College of Art and Design	15			
35	CA	Laney College	32			
36	CA	Los Angeles County College of Nursing and Allied Health	35			✓
37	CA	Los Angeles Pierce College	16			✓
38	CA	Los Medanos College	12			✓
39	CA	Loyola Marymount University	13			
40	CA	Merced College	12			✓
41	CA	Merritt College	19			
42	CA	Mount Saint Mary's College	22			✓
43	CA	Mount San Antonio College	25			✓
44	CA	Napa Valley College	15			
45	CA	Ohlone College	43			
46	CA	Orange Coast College	24			
47	CA	Pasadena City College	31			✓
48	CA	Sacramento City College	26			
49	CA	San Francisco Community College System Office	40			
50	CA	San Joaquin Delta College	21			✓
51	CA	San Jose City College	28			✓
52	CA	San Jose State University	36			
53	CA	Santa Ana College	11			✓
54	CA	Santa Monica College	14			
55	CA	Solano Community College	21			
56	CA	University of California, Riverside	41			✓
57	CA	University of San Francisco	23			
58	CA	University of Southern California	21			
59	CA	West Valley College	16			
60	CA	Woodbury University	11			✓

#	State	Institution	Percentage AANAPI Enrolled (Fall 2006)	Actual ANNH Grantee (2003-2008)	PBI Eligible (Fall 2006)	Title V Eligible (Fall 2006)
61	FM	College of Micronesia-FSM	100			
62	GU	Guam Community College	91			
63	GU	Pacific Islands Bible College	96			
64	GU	University of Guam	90			
65	HI	Chaminade University of Honolulu	49	✓		
66	HI	Hawaii Community College	66	✓		
67	HI	Heald College Honolulu	83			
68	HI	Honolulu Community College	81	✓		
69	HI	Kapiolani Community College	74	✓		
70	HI	Kauai Community College	69	✓		
71	HI	Leeward Community College	79	✓		
72	HI	Maui Community College	61	✓		
73	HI	University of Hawaii - West Oahu	70	✓		
74	HI	University of Hawaii at Hilo	45	✓		
75	HI	University of Hawaii at Manoa	62	✓		
76	HI	Windward Community College	69	✓		
77	IL	City Colleges of Chicago Harry S. Truman College	12			✓
78	IL	Harold Washington College	13		✓	
79	IL	Illinois Institute of Technology	15			
80	IL	Northeastern Illinois University	10			✓
81	IL	University of Illinois at Chicago	24			
82	MA	University of Massachusetts Boston	12			
83	MA	Urban College of Boston	11			✓
84	MD	Montgomery College	14			
85	MD	University of Maryland at College Park	14			
86	MH	College of the Marshall Islands	100			
87	MN	Century Community and Technical College	11			
88	NJ	Bergen Community College	11			
89	NJ	Hudson County Community College	17			✓
90	NJ	Middlesex County College	14			
91	NJ	Nevada State College	12			
92	NJ	City College of New York CUNY	15			
93	NY	College of Mount Saint Vincent	10			

#	State	Institution	Percentage AANAPI Enrolled (Fall 2006)	Actual ANNH Grantee (2003-2008)	PBI Eligible (Fall 2006)	Title V Eligible (Fall 2006)
94	NY	CUNY Bernard M. Baruch	29			
95	NY	CUNY Borough of Manhattan Community College	11			✓
96	NY	CUNY Hunter College	17			
97	NY	CUNY LaGuardia Community College	13			✓
98	NY	CUNY Queens College	19			
99	NY	CUNY York College	11		✓	
100	NY	Kingsborough Community College CUNY	11			
101	NY	New York City Technical College of the City University of New York	12			✓
102	NY	Polytechnic University	31			
103	NY	Pratt Institute	12			
104	NY	Vaughn College of Aeronautics and Technology	12			✓
105	OR	Portland State University	10			
106	PA	Harcum College	12			
107	PW	Palau Community College	100			
108	TX	Houston Community College	11			✓
109	TX	University of Houston Downtown	10			✓
110	TX	University of Saint Thomas	11			✓
111	TX	University of Texas at Arlington	12			
112	UT	Salt Lake Community College	10			
113	WA	Edmonds Community College	10			
114	WA	North Seattle Community College	12			
115	WA	Seattle Central Community College	12			
116	WA	South Seattle Community College	11			

Source: CRS analysis using IPEDS data and information on Title III, Section 312(B) eligibility from the U.S. Department of Education Website at <http://www.ed.gov/about/offices/list/ope/idades/t3eligibleinstitutions2005.pdf> and <http://www.ed.gov/about/offices/list/ope/idades/t3t5-eligibles-2008.pdf> as of March 5, 2009.

Notes: The College of the Marshall Islands, the College of Micronesia/Federated States of Micronesia and Palau Community College have been added as they are indicated as specifically eligible in Title III, Section 312(b) and have at least 10 percent AANAPI enrollment.

All of the institutions in **Table 1** are also, by definition, eligible for the Strengthening Institutions Program (SIP), Section 312, for which institutions are eligible that meet basic eligibility under Title III, Section 312(b). Although AANAPI institutions may be eligible for more than one program, no AANAPI institution that receives funding under the AANAPI Program can receive concurrent funding from another

Title III, Part A program or Title III, Part B or Title V. None of the institutions listed in **Table 1** are also potentially eligible for the

- American Indian Tribally Controlled Colleges and Universities Program (AITCCU), Section 316, for which institutions are eligible that qualify for funding under the Tribally Controlled Colleges and Universities Assistance Act of 1978 (25 U.S.C. 1801) or the Navajo Community College Assistance Act of 1978 (25 U.S.C. 640a) or is cited in section 532 of the Equity in Educational Land-Grant Status Act of 1994 (7 U.S.C. 301 note);
- Native American Serving, Nontribal Institutions Program (NASNTI), Section 319, for which institutions are eligible that meet basic eligibility under Title III, Section 312(b) and serve at least 10 percent Native American students and is not a Tribal College or University (as defined in section 316); or
- Title III, Part B programs, which serve historically Black colleges and universities, established prior to 1964, whose principal mission was, and is, the education of Black Americans, and that are accredited by a nationally recognized accrediting agency and the 18 legislatively designated historically Black graduate institutions.

The actual FY 2008 grantees for the AANAPI Program are shown in **Table 2**.¹¹ All of the institutions listed in **Table 2** are also listed in **Table 1** except Foothill-De Anza Community College District, which did not submit the relevant data to IPEDS for Fall 2006. The City College of San Francisco is listed in **Table 1** as part of the San Francisco Community College System Office.

Table 2. FY 2008 Grantees of the Assistance to Asian American and Native American Pacific Islander-Serving Institutions Program

Count	Institution	State
1	City College of San Francisco	CA
2	Foothill-De Anza Community College District	CA
4	Guam Community College	GU
4	University of Hawaii at Hilo	HI
5	University of Maryland, College Park	MD
6	Seattle Community Colleges	WA

Source: U.S. Department of Education's Web site at <http://www.ed.gov/programs/aanapicraa/aanapisgrantees2008.pdf> as of March 5, 2009.

¹¹ This list was obtained from the U.S. Department of Education at <http://www.ed.gov/programs/aanapicraa/aanapisgrantees2008.pdf> as of March 5, 2009.

If you have any questions or require additional information please do not hesitate to contact me at 7-0376 or CDortch@crs.loc.gov.
