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# Implementation of the Title VI Indian Education Formula Grants Program

## Volume I: Final Report

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# Executive Summary

The Title VI Indian Education Formula Grants program<sup>1</sup> represents the U.S. Department of Education's largest investment in addressing the unique academic and cultural needs of American Indian and Alaska Native children. The program is aimed at supporting services that (1) are responsive to the unique cultural, language, and educational needs of American Indian and Alaska Native students and (2) help these students meet academic standards. School districts, tribes, Indian organizations, Indian community-based organizations, and Bureau of Indian Education schools receiving this grant are required to consult with parents and local tribes in the effort to shape grant-funded services that supplement and enrich regular school programs.

This study examined the nationwide operations of the Title VI grants program to inform the field about the strategies grantees used in their implementation of the grant projects. Specifically, the study addressed the following questions:

1. What services do Title VI grants support?
2. How do grantees work with stakeholders to identify program-eligible children and plan services to meet the needs of those children?
3. How do grantees measure progress toward their project objectives?

Key findings from the study included the following:

- According to grant coordinators, the most common Title VI-funded services were academic support, cultural enrichment, and parent involvement.
- Most grantees supported culturally responsive education by incorporating American Indian and Alaska Native history and culture into the curriculum and employing American Indian and Alaska Native teachers and support staff.
- Most grantees reported relying on three strategies to identify eligible students: (1) including questions about students' American Indian and Alaska Native status in the school registration process, (2) including Title VI student eligibility certification forms in enrollment packets, and (3) generating reports on students who identified as American Indian and Alaska Native on school enrollment forms.
- Most grantees collected information about students' needs from a Title VI Parent Advisory Committee and other stakeholder groups, commonly through public hearings, convenings with the stakeholder groups, and surveys.
- Title VI grantees reported using multiple data sources for project planning, including administrative data and information from parents, teachers, administrators, and from public hearings.

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<sup>1</sup> The Indian Education Formula Grants to Local Educational Agencies program is authorized under Title VI, Part A, of the *Elementary and Secondary Education Act of 1965 (ESEA)* as reauthorized under the *Every Student Succeeds Act of 2015 (ESSA)*, Pub. L. No. 114-95 (2015).

- Most grantees used state standardized assessment scores, attendance data, and graduation/dropout data to measure progress toward Title VI project objectives.

## Title VI Program Description

The authorizing legislation calls for culturally responsive teaching and learning services that supplement and enrich the regular school program. The program requires that grantees identify goals or “objectives” for their local project that are (1) based on a needs assessment and (2) developed in open consultation with parents, teachers, representatives of Indian tribes,<sup>2</sup> and secondary students (if appropriate). Local project objectives could include, for example, increasing American Indian and Alaska Native students’ academic achievement, knowledge of cultural identity and awareness, and school attendance. Grantee services should support these objectives and may include, for example, culturally responsive academic support, mentoring, and educator professional development; native language instruction; and parent involvement. Grantees are expected to assess progress toward their project objectives.

Under the Title VI program, school districts,<sup>3</sup> tribes, Indian organizations, Indian community-based organizations, and Bureau of Indian Education (BIE) schools submit an application and receive funds based on the number of eligible students. For the 2017–18 school year, the Title VI program provided grants to 1,304 grantees, mostly school districts (88 percent). School districts include both single-applicant local education agencies (LEAs) (i.e., traditional school districts or charter schools) and LEA consortia (i.e., two or more school districts that coordinated their grant activities). Schools funded or operated by the BIE accounted for 10 percent of grantees; 6 percent were BIE funded but operated by a tribe, and 4 percent were operated by the BIE. The remaining 2 percent of grantees included tribes applying in lieu of one or more LEAs and two Indian community-based organizations.

In 2017–18, more than half the Title VI grant awards were under \$40,000, with a median size of \$36,608. The average amount per pupil was \$216. Grant award sizes ranged from the minimum award of \$4,000 to a high of \$3.3 million.

## Study Design

The study had four components: an extant data analysis, a review of the literature, a survey of all 2017–18 Title VI grantees, and case studies of nine Title VI grantees. The analysis of extant data was designed to characterize the universe of grantees, inform case study site selection, and guide survey and interview protocol development. To further inform survey and interview protocol development, the literature review focused on efforts to provide culturally responsive education, identify eligible American Indian and Alaska Native students, and involve parents, tribes, and communities in planning services. The survey of grant coordinators associated with all 1,304 Title VI grantees was designed to provide information on the full population of 2017–18 grantees; 92 percent of grantees completed the survey. The grantee survey covered the following topics: Title VI-funded services, coordination of Title VI-funded services with other programs and service providers, methods for identifying and counting eligible students, planning services for eligible students, and measuring progress toward project objectives. Case studies of nine Title VI grantees allowed for an in-depth exploration of program

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<sup>2</sup> A requirement that school districts meaningfully collaborate with local Indian tribes, and that all grantees engage in open consultation with local tribes and tribal organizations, was added in the 2015 reauthorization of the *Elementary and Secondary Education Act, Every Student Succeeds Act (ESSA)* (see *ESEA* § 6114(b)(7) and (c)(3)(C)).

<sup>3</sup> In this report, the terms “local education agencies” (LEAs) and “school districts” are used interchangeably.

planning and implementation in a subset of sites. The case study sites were selected to include variation across three dimensions: grant award size, grantee type, and geographic region. The interview protocols were designed to generate concrete, detailed examples to illustrate and provide context for the survey findings, so the topics covered in the protocols paralleled those in the survey.

## Summary of Findings

### ***Title VI-Funded Services***

As reported by coordinators, grantees used Title VI grants to supplement funding for an array of academic support and cultural enrichment activities and services intended to bolster American Indian and Alaska Native children's educational outcomes.

**The most common Title VI-funded services were academic support such as homework and study skills assistance (87 percent), cultural enrichment such as field trips and special events (74 percent), and parent involvement (62 percent).**

Less common services supported through Title VI funds included college and career preparation, including college preparation (45 percent) and career preparation (37 percent); school readiness, including family literacy (26 percent) and early childhood programs (26 percent), and various prevention programs, including dropout prevention (42 percent) and substance abuse prevention (24 percent).

**More than two thirds of grantees supported culturally responsive education by incorporating American Indian and Alaska Native history and culture into the curriculum (70 percent) and using American Indian and Alaska Native teachers and support staff (68 percent).**

Less frequently, Title VI grantees connected students with mentors or counselors from the tribal community (48 percent) and delivered instruction in American Indian or Alaska Native languages (32 percent).

**The greatest challenge in Title VI grantees' delivery of services using culturally responsive practices was the availability of school staff with relevant knowledge of and expertise in native languages, culturally responsive education, and students' cultural background.**

Despite the requirement to deliver Title VI-funded services using culturally responsive practices, about three-fifths of grantees (58 percent) reported that it was somewhat challenging or very challenging to do so. Of these, most reported challenges with the availability of school staff knowledgeable about American Indian or Alaska Native languages (87 percent) or with expertise in culturally responsive education (80 percent). Other factors were the availability of school staff knowledgeable about students' cultural backgrounds (72 percent) or the availability of staff within their organization (e.g., school district, BIE, or tribe) with expertise in culturally responsive education (72 percent).

**The vast majority of grantees (89 percent) reported coordinating Title VI-funded services with at least one other program. The most common programs were Title I, Part A programs (67 percent), *Individuals with Educational Disabilities Act* programs (57 percent), and the BIE-funded Johnson-O'Malley programs (45 percent).**

Other programs with which Title VI-funded services were coordinated included the Education for Homeless Children and Youth program (authorized under the *McKinney-Vento Homeless Assistance Act*) (43 percent), programs delivered by local service providers (35 percent), and Impact Aid (34 percent).

**The strategies that grantees most commonly adopted to facilitate coordination with other programs included sharing data on students (76 percent) and sharing information on programs and services they believed to be effective (70 percent).**

Additional but less commonly reported coordination strategies included sharing costs associated with providing services (61 percent) and building programmatic linkages among programs, agencies, and organizations (53 percent).

### ***Identifying Program-Eligible Children and Planning Services to Meet Their Needs***

Title VI funding is calculated with a formula based on the number of students who have submitted an Office of Indian Education Title VI ED 506 Indian Student Eligibility Certification Form (ED 506 form) documenting their American Indian or Alaska Native status.

**Most grantees reported relying on three strategies to identify eligible students: (1) including questions about students' American Indian and Alaska Native status in the school registration process (76 percent), (2) including ED 506 forms in enrollment packets (75 percent), and (3) generating reports for students who were identified as American Indian and Alaska Native on enrollment forms (66 percent).**

Grantees less frequently conducted awareness-raising activities (e.g., trainings, presentations, meetings) (39 percent), coordinated with organizations that work with American Indian and Alaska Native families to notify them about available Title VI-funded services (35 percent), or included common tribal affiliations on the ED 506 form (24 percent).

**To confirm the accuracy and completeness of information collected on ED 506 forms, most grantees collected physical copies of the forms and conducted annual reviews of the forms to update information on eligible students.**

Nearly all grantees (95 percent) collected physical copies of ED 506 forms from families to confirm that the information provided was accurate and complete. Most grantees conducted an annual review of the ED 506 forms to update information on eligible students by removing students who had left the district and removing any duplicate student entries (85 percent), and the majority reported linking data collected through ED 506 forms to district student enrollment systems (66 percent). Fewer grantees reported linking data collected through the ED 506 form to state student enrollment systems (27 percent) or collecting electronic ED 506 forms from newly registered American Indian and Alaska Native families (17 percent).

**More than two in five grantees reported that helping parents and guardians collect and submit acceptable information to confirm their child's eligibility was somewhat or very challenging.**

Grantees had mixed experiences in their efforts to identify eligible children. While fewer than half (45 percent) reported that helping parents and guardians collect and submit acceptable information (e.g., tribal membership or enrollment number, letter from tribe) to confirm their child's eligibility to

receive Title VI-funded services was somewhat or very challenging, more than half (55 percent) found that helping parents collect and submit information was minimally challenging or not challenging.

**Most grantees collected information about students' needs from a Title VI Parent Advisory Committee and other stakeholder groups, commonly through public hearings, convenings with stakeholder groups, and surveys.**

In conducting the needs assessment, grantees most commonly collected information from Title VI Parent Advisory Committees, educators (i.e., schools administrators, teachers), students, school boards and/or district administrators, and school- or tribe-based parent committees. They used a variety of strategies to collect information from key stakeholders. They tended to rely on face-to-face communication such as public hearings (70 percent) and convenings (64 percent), although many also used surveys (62 percent).

**Most grantees reported using multiple data sources for project planning, including administrative data and information from parents, teachers, and administrators and from public hearings.**

In planning grant-funded services, most grantees used the information gathered through their needs assessments, including administrative data such as course grades, test scores, and attendance data (94 percent) and ideas and recommendations from parents (86 percent), from teachers and administrators (82 percent), and from public hearings (73 percent).

### ***Measuring Progress Toward Title VI Project Objectives***

All grantees are required to identify the data sources they will use to measure progress toward meeting their projects' objectives, which could include, for example, increasing American Indian and Alaska Native students' academic achievement, knowledge of cultural identity and awareness, and school attendance.

**Most grantees used state standardized assessment scores (83 percent), attendance data (80 percent), and graduation/dropout data (66 percent) to measure progress toward Title VI project objectives.**

Less commonly used data sources for measuring progress toward Title VI project objectives included survey or focus group data collected from parents, guardians, or families (46 percent), from students themselves (43 percent), or from school staff (39 percent). School districts were more likely than BIE schools and tribes to use standardized assessment scores, graduation rates, and college acceptance data to measure progress; BIE schools and tribes were more likely than school districts to rely on culturally relevant measures.

# Chapter 1. Introduction

The Title VI Indian Education Formula Grants<sup>1</sup> program is the U.S. Department of Education’s largest investment in addressing the unique academic and cultural needs of American Indian and Alaska Native children. Grantees are charged with planning and delivering services that (1) are responsive to the unique cultural, language, and educational needs of American Indian and Alaska Native students and (2) help these students meet academic standards. There is some evidence suggesting that culturally responsive schooling may help Indigenous students meet challenging academic standards (Castagno and Brayboy 2008; Lomawaima and McCarty 2006). The importance of the charge to Title VI grantees is magnified by the challenges that Indigenous communities in the United States may face (e.g., poverty, unemployment) (DeVoe and Darling-Churchill 2008).

## Title VI Program Description

The authorizing legislation calls for grantees to provide culturally responsive teaching and learning services that supplement and enrich the regular school program. The program requires that grantees identify project objectives and services that are (1) based on a needs assessment and (2) developed in consultation with community stakeholders, including parents, teachers, students (if appropriate), and local tribes and tribal organizations. Local project objectives could include, for example, increasing American Indian and Alaska Native students’ academic achievement, knowledge of cultural identity and awareness, and school attendance. Grantee services should support these objectives and may include, for example, culturally responsive academic support, mentoring, and educator professional development; native language instruction; and parent involvement. Grantees are expected to assess progress toward project objectives.

Prospective grantees submit a two-part application. In the first part, they select their “applicant type” as grantees may be school districts,<sup>2</sup> tribes, Indian organizations, Indian community-based organizations, and Bureau of Indian Education (BIE) schools and submit their “Indian student count.”<sup>3</sup> The second part of the application enables grantees to identify objectives, services, and data sources for measuring progress towards objectives, as described above.<sup>4</sup>

Most Title VI grants were allocated to school districts. In 2017–18, 88 percent of the 1,304 grantees were school districts, both single-applicant LEAs (i.e., traditional school districts or charter schools) and LEA consortia (i.e., two or more school districts that coordinate their grant activities). Schools that received BIE funding constituted 10 percent of the grantees; these included BIE-operated elementary and secondary schools as well as BIE grant or contract schools (i.e., BIE-funded but operated by a tribe). The remaining 2 percent of grantees were 23 tribes applying in lieu of one or more LEAs and two Indian

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<sup>1</sup> The Indian Education Formula Grants to Local Educational Agencies program is authorized under Title VI, Part A, of the *Elementary and Secondary Education Act of 1965 (ESEA)* as reauthorized under the *Every Student Succeeds Act of 2015 (ESSA)*, Pub. L. No. 114-95 (2015).

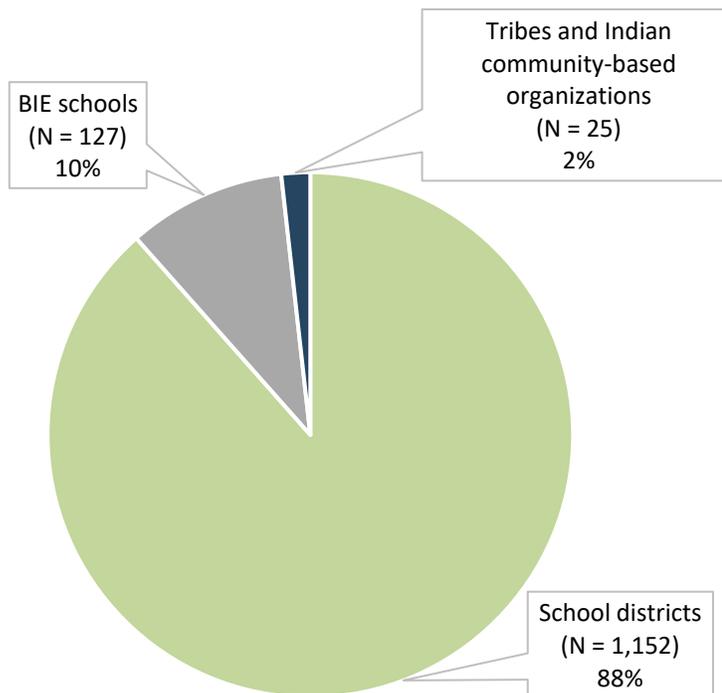
<sup>2</sup> In this report, the terms “local education agencies” (LEAs) and “school districts” are used interchangeably.

<sup>3</sup> The “Indian student count” is based on the number of eligible students served by the grantee. Most grantees must maintain completed Office of Indian Education Title VI ED 506 Indian Student Eligibility Certification Forms (ED 506 forms) for each student. BIE schools may use an alternate form. The process for identifying eligible students is described in detail in Chapter 3.

<sup>4</sup> Additional information about the two-part application process and program requirements is available through the Department’s [Frequently Asked Questions page](#).

community-based organizations (Exhibit 1). Tribes and Indian organizations may apply in lieu of an otherwise eligible LEA if the LEA does not establish the required Parent Advisory Committee and the tribe or Indian organization represents at least half the eligible children served by the LEA. Indian community-based organizations may apply under the same circumstances, if neither a tribe nor an Indian organization applies.

**Exhibit 1. Distribution of Title VI grantees, by type, 2017–18**

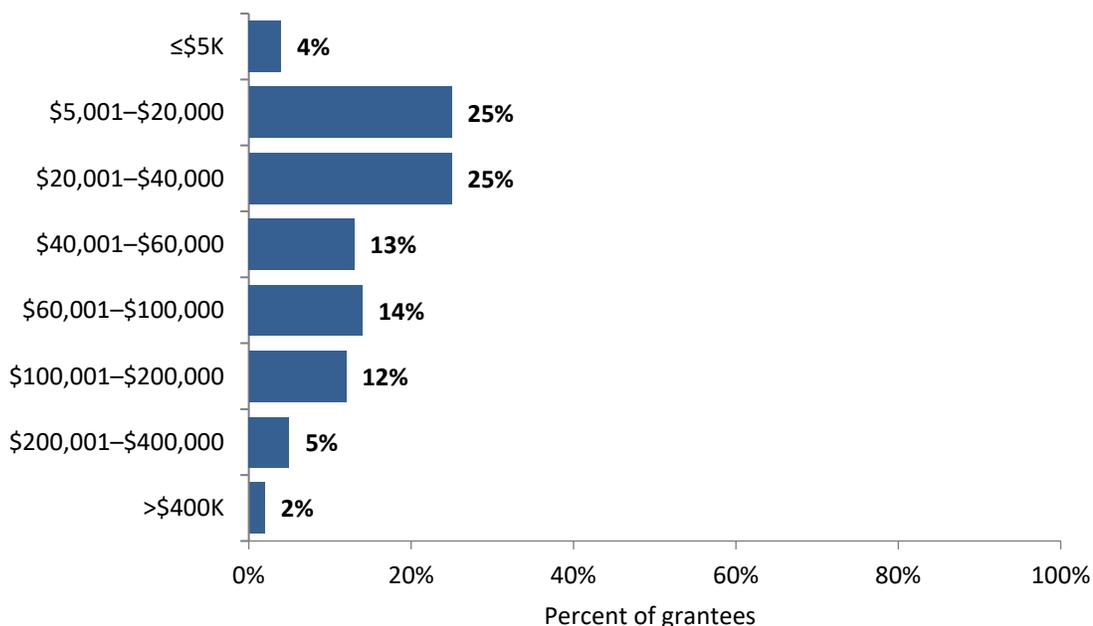


**Exhibit reads:** In 2017–18, 88 percent of grantees were school districts (including both single-applicant school districts and consortia of school districts), 10 percent were BIE schools (including schools run under a contract with the BIE and schools operated by the BIE), and 2 percent were tribes and Indian community-based organizations.

Source: Data provided to this study by the Office of Indian Education, U.S. Department of Education ( $n = 1,304$ ; see Exhibit A-1 in the Technical Appendix).

In 2017–18, more than half the Title VI grant awards were under \$40,000, with a median size of \$36,608. The average amount per pupil was \$216. Title VI grant awards ranged from a statutory minimum of \$4,000 to a maximum of \$3,254,999. Of the 1,304 grants awarded in 2017–18, 54 percent were under \$40,000, 29 percent were under \$20,000, and 4 percent were \$5,000 or less (Exhibit 2). At the high end of the spectrum, 19 percent of grantees received \$100,000 or more, and the seven largest grant awards were over \$1 million. Except for one BIE-operated school that received just over \$4,000, the largest and the smallest grants were awarded to districts.

**Exhibit 2. Distribution of Title VI grantees, by grant award size, 2017–18**



**Exhibit reads:** In 2017–18, 4 percent of Title VI grantees were awarded \$5,000 or less.

Source: Data provided to this study by the Office of Indian Education, U.S. Department of Education ( $n = 1,304$ ; see Exhibit A-2 in the Technical Appendix).

## Study Design

The purpose of this study was to learn about nationwide operations of the Title VI Indian Education Formula Grants program to inform the U.S. Department of Education’s Office of Indian Education (OIE) and its grantees about the strategies grantees used to implement the grant. Specifically, the study addressed the following questions:

1. What services do Title VI grants fund?
2. How do grantees work with stakeholders to identify program-eligible children and plan services to meet the needs of those children?
3. How do grantees measure progress toward their project objectives?

The study had four components: an extant data analysis, a review of the literature, a survey of all 2017–18 Title VI grantees, and case studies of nine Title VI grantees. This section describes the role of each study component and, where relevant, the sample.

### ***Extant Data Analysis***

The analysis of extant data was designed to characterize the universe of grantees, inform case study site selection, and guide survey and interview protocol development. We analyzed 2017–18 data from grantee applications drawn from the U.S. Department of Education’s Electronic Application System for Indian Education (EASIE), the Indian Education Formula Grant EASIE Budget Report, and Annual Performance Reports. The applications contained information on grantee type and project objectives,

the EASIE Budget Report contained information on grant award size, and the Annual Performance Reports provided information on the types of grant-funded services and the data sources used to measure project outcomes.

### ***Literature Review***

To situate the study in the context of existing programs, services, partnerships, and initiatives that promote education for American Indian and Alaska Native students, we reviewed the research literature with a focus on efforts to provide culturally responsive education, identify eligible American Indian and Alaska Native students, and involve parents, tribes, and communities in planning and developing programming. The information gained from the review was used in the development of data collection instruments, including the grantee survey and interview protocols.

### ***Grantee Survey***

The study-administered survey of grant coordinators associated with all 1,304 Title VI grantees was designed to provide information on the full population of 2017–18 grantees. Surveying the entire population rather than a sample was feasible because of the relatively small grantee population size. Moreover, surveying the entire population was more cost-efficient than designing a sampling frame that would be representative of key grantee characteristics (e.g., grantee type and award size), and it yielded the smallest margin of measurement error.

Designed to align with the study questions, the grantee survey covered the following topics: Title VI-funded services, coordination of Title VI-funded services with other programs and service providers, methods for identifying and counting eligible students, planning services for eligible students, and assessing the outcomes and impact of Title VI-funded services on participating American Indian and Alaska Native students. The survey was tailored slightly to reflect the differences between the three main types of grantees—school districts, BIE-funded schools, and tribes.

### ***Case Studies***

Case studies of nine grantees were conducted to provide a more in-depth exploration of program planning and implementation in a subset of sites. The case study sites were selected to include variation across three dimensions: grant award size (as defined by quartiles), grantee type, and geographic region (Exhibit 3). Additionally, case study sites varied in the number and concentration of program-eligible students, grade levels targeted (i.e., pre-K, elementary, middle, and high), and project objectives and services.

**Exhibit 3. Case study sample, by grantee type, geographic region, and award size**

	LEA (single)	LEA (consortium)	BIE grant or contract school	BIE-operated school	Tribe in lieu of LEA(s)	Total
Pacific	1 large award 1 medium award	1 large award				3
Mountain				1 medium award	1 large award	2
North Central			1 medium award			1
South Central	1 large award 1 very small award					2
Atlantic	1 small award					1
<b>Total</b>	5	1	1	1	1	9

**Exhibit reads:** In the Pacific region, the case study sample comprised three LEA grantees, including two single LEA grantees (one with a large award and one with a medium-size award) and one LEA consortium with a large award.

The interview protocols were designed to elicit concrete, detailed examples to illustrate and provide context for the survey findings; the topics covered in the protocols paralleled those in the survey. The quantitative survey data and qualitative case study data were integrated to provide a fuller picture of the context in which grantees operated; how they supported ED 506 form completion and engaged with key stakeholders; how they developed, implemented, and refined programs (including supports and challenges); and how they measured progress toward project objectives.

## Data Collection Activities and Analysis Methods

### *Grantee Survey Administration and Analysis*

Data collection started in early March and ended in early May 2018. The survey was administered to Title VI grant coordinators through an online platform. To promote high participation, the U.S. Department of Education sent letters notifying the grant coordinators about the study before the survey launch. The grant coordinators then received emails with unique links to the survey. Follow-up with nonrespondents occurred first by email and then by telephone. The final survey response rate was 92 percent.

Stata software was used to generate descriptive statistics (frequencies, means, counts, and standard deviations), including disaggregation of the data by grantee type and grant award size. In comparing grantees by type of organization, we combined tribes, Indian community-based organizations, and BIE schools because they were small in number<sup>5</sup> and compared them as a group with district grantees. In comparing grantees by award size, we compared grantees above and below the median. References in the text to differences between groups of grantees only discuss differences that are statistically significant using a significance level of  $p < .05$ .<sup>6</sup>

<sup>5</sup> Because there were just two Indian community-based organizations, this group is referred to as “BIE schools and tribal grantees.”

<sup>6</sup> When the  $p$  level is less than .05, there is less than a 5 percent chance that the observed difference between the two groups was simply due to chance.

## **Case Study Site Visits and Analysis**

Prior to the site visits, site visitors gathered and reviewed background information on their sites, including grant applications, Annual Performance Reports, the EASIE Budget Report, the grantee's survey responses, and publicly available information about the community and the tribe or tribes it serves. In addition, site visitors received training on the data collection protocols and procedures. At this training, study team members based at the Center for Indian Education at Arizona State University led a workshop on culturally responsive practices when working with American Indian and Alaska Native respondents and gathering information in Indigenous communities. This workshop conveyed information about how to think of research as a relational rather than a transactional process, including the importance of responsibility, respect, and reciprocity when working with Indigenous communities.

Seven site visits were conducted in April and May 2018 and two in August 2018, for a total of nine. For each site, a pair of researchers spent approximately two days on site, conducting interviews with the Title VI grant coordinators and other grantee staff members including program administrators, leaders, instructional personnel, and counselors; an education leader such as a superintendent, board member, or tribal education leader; and tribal leaders. Focus groups were held with parents. All site visit interviews were audio recorded and the recordings transcribed.

After completing a visit, the two site visitors collaborated to complete a prestructured debrief guide, which closely aligned with the study questions. The site visitors coded the interview transcripts for their site according to the debrief guide topics and then summarized findings across multiple interviews and parent focus group(s). Interview data were labeled by respondent type to support drawing on the perspectives of diverse respondent types as well as to track the consistency and discrepancies of interviewee responses. Site visitors also participated in large-group briefings to share lessons learned from their data collection experiences and to discuss findings across all sites.

## **Study Limitations**

The nine case study sites are not nationally representative; data collected through site visits were intended to be illustrative and did not represent the full range of views of grantee personnel, parents, or tribal leaders at the case study sites or at the 1,295 sites not visited. Interviewees' statements about program processes, challenges, and successes represented the perspectives of the individuals making them.

## **Technical Appendices**

This report is accompanied by a separate volume containing the following technical appendices:

- Appendix A: Supplemental Exhibits
- Appendix B: Data Collection Instruments
- Appendix C: Title VI Student Eligibility Certification Form

## Chapter 2. Providing Title VI-Funded Services to Eligible American Indian and Alaska Native Students

The Title VI Indian Education Formula Grants program seeks to improve the education opportunities and outcomes of American Indian and Alaska Native children by supporting services responsive to their unique cultural, language, and educational needs and by helping them meet state academic standards. While definitions vary, culturally responsive education aims to build a bridge between children’s identities and cultures and their schools (Castagno and Brayboy 2008). Title VI grants are to be used to supplement and enrich the regular school program and must not supplant existing funding sources. Specific activities may include native language programs and culturally related activities; early childhood and family programs that emphasize school readiness; academic and enrichment programs that directly support the attainment of state standards; college and career preparation activities; dropout prevention strategies and programs preventing violence, suicide, and substance abuse; and strategies to meet the educational needs of students in correctional facilities. Additionally, the statute requires all grantees to offer professional development “as needed,” to ensure that new teachers and other professionals are prepared to work with Indian children, and that all teachers involved have been properly trained to carry out the project (*ESEA* § 6114(b)(5)).

This chapter describes the types of academic, cultural, readiness, preparation, and prevention services Title VI grantees provided American Indian and Alaska Native students and their families in 2017–18. It also describes practices that grantees reported using to support a culturally responsive education and the challenges they faced. Finally, this chapter describes the types of federal, state, and local programs with which grantees coordinated Title VI-funded services and activities.

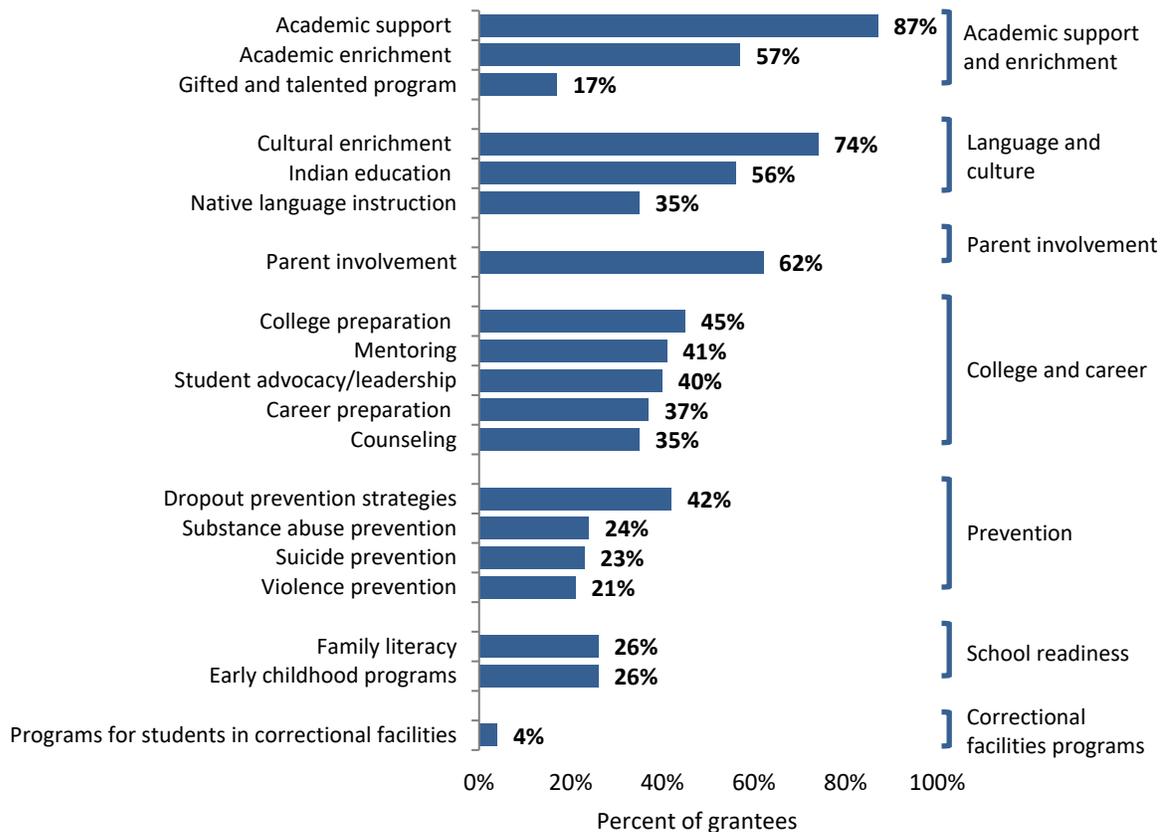
### Title VI-Funded Services

As reported by coordinators, grantees used Title VI grants to supplement funding for an array of academic support and cultural enrichment activities and services to bolster American Indian and Alaska Native children’s educational outcomes.

**The most common Title VI-funded services were academic support such as homework and study skills assistance (87 percent), cultural enrichment such as field trips and special events (74 percent), and parent involvement (62 percent).**

Less common services supported through Title VI grant funds included college and career preparation, including college preparation (45%) and career preparation (37%); school readiness, including family literacy (26%) and early childhood programs (25%); and various prevention programs, including dropout prevention (42%) and substance abuse prevention (24%) (Exhibit 4).

**Exhibit 4. Services and activities provided through Title VI grants, by service category, 2017–18**



**Exhibit reads:** In 2017–18, 87 percent of grantees used Title VI funds to provide academic support.

Source: Survey of Title VI Grant Coordinators, Item 14 (n = 1,152; see Exhibit A-3 in the Technical Appendix).

Case study interviewees provided examples of the services and activities Title VI grants supported. A Title VI grant coordinator at one site described using grant funds to provide students with a range of services they would not otherwise receive.

*Our kids get to participate in so much more than the school can provide for them. There would be no more college campus tours. Our K–5 and middle school groups plan field trips where they go to museums and aquariums and things like that. The career and college readiness stuff would go away.... The resources that are purchased for cultural instruction would go away, because there would be nobody here to help when you have the majority of teachers [who are] nonnative.*

At another site, the grant coordinator described targeting the Title VI resources at the high school by funding the coordinator’s salary, a portion of a para-educator’s time, and school supplies for students. “It’s a small program,” he explained, “a small grant spread out.... We pull in that population of native students and then try to apply services where we can. It’s a challenge.”

BIE-funded schools and tribes were more likely than school districts to use Title VI funds to support American Indian and Alaska Native students’ language and culture, including native language instruction

and Indian education (e.g., language and history). School districts, however, were more likely than BIE and tribal grantees to fund services related to academic support and enrichment (e.g., college preparation and academic support) and dropout prevention (Exhibit 5).

**Exhibit 5. Title VI grant-funded services and activities provided, by grantee type, 2017–18**

	School districts	BIE schools and tribes	Percentage point difference
<b>More commonly used by BIE schools and tribal grantees</b>			
Native language instruction	31%	75%	44
Indian education	53	84	31
<b>More commonly used by district grantees</b>			
College preparation	47	23	24
Academic support	89	67	22
Career preparation	39	24	15
Dropout prevention strategies	43	28	15

**Exhibit reads:** In 2017–18, 47 percent of district grantees and 23 percent of BIE and tribal grantees used grant funds to provide college preparation services, a 24 percentage point difference.

Note: All differences between groups are statistically significant at  $p < .05$ .

Source: Survey of Title VI Grant Coordinators, Item 14 (school districts  $n = 1,032$ ; BIE schools and tribes  $n = 120$ ; see Exhibit A-4 in the Technical Appendix).

On average, Title VI grantees reported providing eligible students with approximately 7.5 types of services and activities. The menu of service types varied, but most grantees (65 percent) provided both academic support (e.g., help with homework and developing study skills) and cultural enrichment (such as field trips and special events). However, grantees with larger awards (above the median) provided more services and activities (an average of 8.3 services and activities) than grantees with smaller awards (an average of 6.7 services and activities) (see Exhibit A-5 in the Technical Appendix). Accordingly, grantees with larger awards were more likely than grantees with smaller awards to provide many specific services (Exhibit 6).

**Exhibit 6. Title VI grant-funded services and activities provided, by grant award size, 2017–18**

	Larger awards (above median)	Smaller awards (below median)	Percentage point difference
Indian education (e.g., language and history)	65%	47%	18
Dropout prevention	50	33	17
Native language instruction	43	28	15
Career preparation	44	30	14
College preparation	51	38	13
Student advocacy/leadership	46	33	13
Cultural enrichment	80	68	12
Parent involvement	68	57	11
Family literacy	31	20	11
Academic enrichment	61	52	9
Mentoring	45	37	8
Suicide prevention	26	19	7

**Exhibit reads:** In 2017–18, 65 percent of grantees with larger awards and 47 percent of grantees with smaller awards used grant funds for Indian education, an 18 percentage point difference.

Note: All differences between groups are statistically significant at  $p < .05$ .

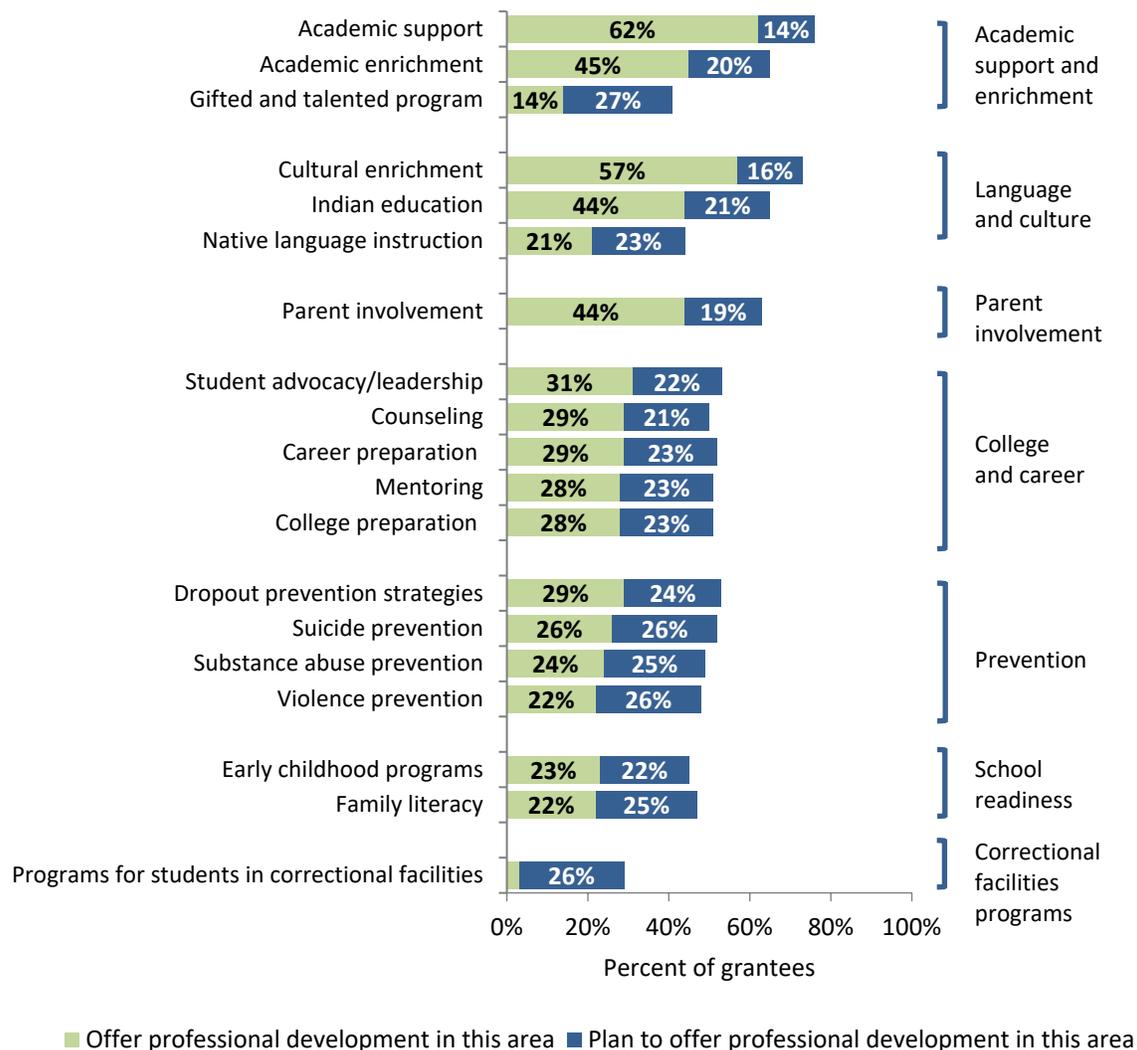
Source: Survey of Title VI Grant Coordinators, Item 14 (grantees with larger awards  $n = 594$ ; grantees with smaller awards  $n = 558$ ; see Exhibit A-7 in the Technical Appendix).

**More than half the grantees offered professional development to teachers and support staff to support academics (62 percent) and cultural enrichment (57 percent).**

Slightly less than half the grantees offered professional development in support of academic enrichment (45 percent), Indian education (44 percent), and parent involvement (44 percent) (Exhibit 7).

Approximately one in five grant coordinators reported *planning to offer* professional development on these topics.

**Exhibit 7. Grantees reporting offering teachers and support staff professional development on Title VI-funded services and activities, 2017–18**



**Exhibit reads:** In 2017–18, 62 percent of grantees offered teachers and support staff professional development for academic support, and 14 percent planned to offer professional development in this area.

Source: Survey of Title VI Grant Coordinators, Item 15 (n = 1,146; see Exhibit A-8 in the Technical Appendix).

In the case study interviews, teachers in one school district described having received some professional development to address the culturally specific needs of American Indian and Alaska Native students. The teachers participated in professional development the local tribe provided to help school staff learn about American Indian and Alaska Native cultures. As one school staff member explained,

*[The tribe] actually did a kind of mini-camp for us. It was a day when they went over different types of cultural taboos and things that for me as a teacher were very helpful to understand more about... [their] beliefs about animals and beliefs about family members*

*and why every female family member is called an aunt or a grandma, even though they're not related. Several things like that.*

In another case study site, teachers had direct experiences to help them incorporate culturally responsive education into their professional practice. The superintendent described how the district inducted new teachers as follows.

*We will have all new teachers come here first, in [town], and then...they are going to become familiar with the expectations for the state standards and the state cultural standards, overall district perspectives on the cultural piece of our program, and then go [to area villages to] become more engaged in how it is actually applied in our different villages.*

School districts and BIE-funded schools and tribes differed in the areas they provided professional development to support the delivery of Title VI-funded services and activities (Exhibit 8). School districts, for example, were more likely than BIE-funded schools and tribes to report offering (or planning to offer) professional development to teachers and support staff on dropout prevention, mentoring, career preparation, and college preparation. Grantees from BIE-funded schools and tribes were significantly more likely than those from school districts to report offering (or planning to offer) professional development for teachers and support staff on Indian education (e.g., language, history) and native language instruction.

**Exhibit 8. Title VI-funded services and activities for which professional development was offered or planned, by grantee type, 2017–18**

	School districts	BIE schools and tribes	Percentage point difference
Programs for students in correctional facilities	27%	69%	42
Native language instruction	39	77	38
Indian education	64	85	21
Gifted and talented program	40	58	18
Substance abuse prevention	47	64	17
Suicide prevention	50	64	14
Family literacy	45	59	14
Student advocacy/leadership	52	64	12
Violence prevention	50	61	11

**Exhibit reads:** In 2017–18, 27 percent of district grantees and 69 percent of BIE and tribal grantees offered or planned to offer professional development in programs for students in correctional facilities, a 42 percentage point difference.

Note: All differences between groups are statistically significant at  $p < .05$ .

Source: Survey of Title VI Grant Coordinators, Item 15 (school districts  $n = 1,027$ ; BIE schools and tribes  $n = 119$ ; see Exhibit A-9 in the Technical Appendix).

Finally, grantees with larger awards were more likely than grantees with smaller awards to report offering (or planning to offer) professional development to teachers and support staff to support the delivery of the services and activities they funded (Exhibit 9).

**Exhibit 9. Title VI-funded services and activities for which professional development was offered or planned, by grant award size, 2017–18**

	Larger awards (above median)	Smaller awards (below median)	Percentage point difference
Indian education	73%	58%	15
Cultural enrichment	79	67	12
Dropout prevention strategies	58	47	11
Career preparation	57	46	11
College preparation	56	47	9
Native language instruction	47	39	8

**Exhibit reads:** In 2017–18, 73 percent of grantees with larger awards and 58 percent of grantees with smaller awards offered or planned to offer professional development in Indian education, a 15 percentage point difference.

Note: All differences between groups are statistically significant at  $p < .05$ .

Source: Survey of Title VI Grant Coordinators, Item 15 (grantees with larger awards  $n = 590$ ; grantees with smaller awards  $n = 556$ ; see Exhibit A-10 in the Technical Appendix).

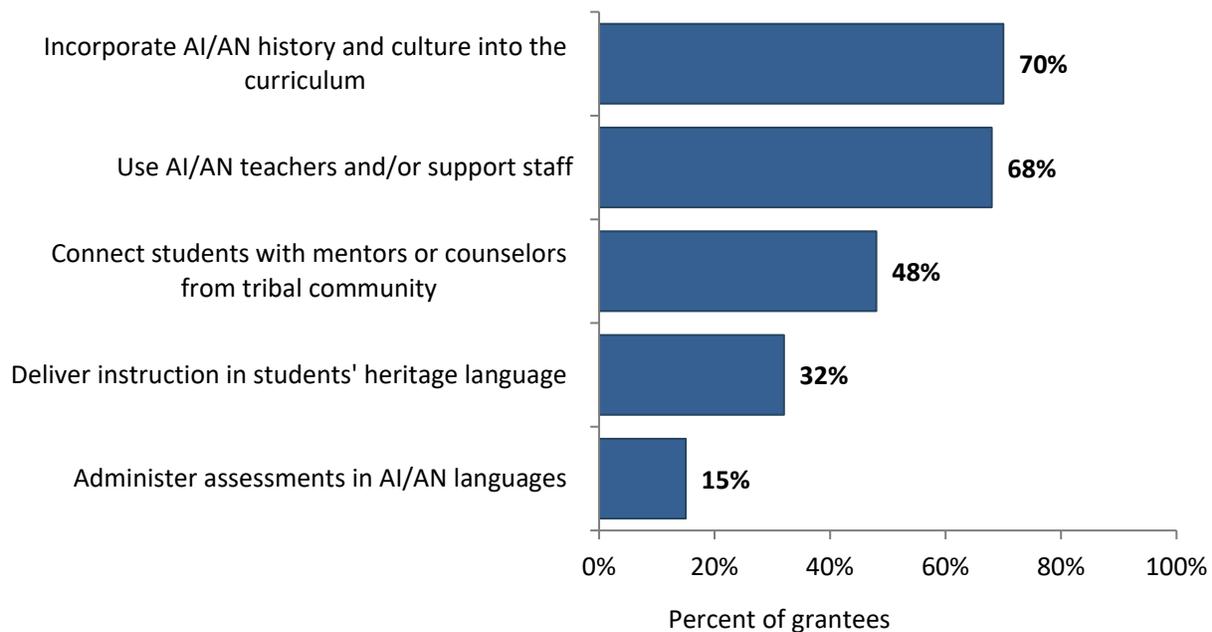
## Supporting Culturally Responsive Education

Title VI grantees relied on several strategies to provide activities and services using culturally responsive educational practices.

**More than two thirds of grantees supported culturally responsive education by incorporating American Indian and Alaska Native history and culture into the curriculum (70 percent) and using American Indian and Alaska Native teachers and support staff (68 percent).**

Less frequently, Title VI grantees connected students with mentors or counselors from the tribal community (48%) and delivered instruction in students’ heritage language (32%) (Exhibit 10).

**Exhibit 10. Title VI grantee practices to support culturally responsive education for American Indian and Alaska Native (AI/AN) students, 2017–18**



**Exhibit reads:** In 2017–18, 70 percent of grantees reported that they supported culturally responsive education by incorporating American Indian and Alaska Native history and culture into the curriculum.

Note: Analyses excluded respondents selecting “Not applicable” or “Don’t know.”

Source: Survey of Title VI Grant Coordinators, Item 16 ( $n = 1,150$ ; see Exhibit A-11 in the Technical Appendix).

In case study interviews, respondents described the strategies they implemented to support a culturally responsive education for students, such as by using American Indian and Alaska Native teachers and support staff to teach native languages, providing guidance and support to nonnative staff, and strengthening school-parent relationships. One case study grantee used Title VI funding to fund a part-time coordinator as well as part-time afterschool staff. The coordinator served as a cultural resource teacher who also supported culturally responsive education throughout the school day. For example, the coordinator visited classrooms to lead activities in American Indian culture, stories, and arts and crafts. At another site, Title VI funds supported a culture class in which students learned tribal history and customs as well as the native language.

Another Title VI grantee described having elders and community members engage students in activities related to tribal traditions and cultural knowledge. The superintendent explained,

*In [one of the villages], they have a fish camp and... they go up there and do all the traditional activities, the hunting and the fishing, [and] how to survive in this environment. We just try to integrate those essential subsistence activities that [the tribes] do.*

Grantees also explained how they incorporated American Indian and Alaska Native history and culture into their curricula. One grantee had students do project-based learning that included culturally relevant

hands-on math, science, and career-tech while ensuring that they stayed active and outdoors in the winter. A grantee staff member described the program as follows.

*Starting this year, [we did] a high school mushing program. We're building in carpentry. The kids made doghouses....They put up the fish, and in science we take that fish and look under a microscope for bacterial growth, depending on how we cure that fish and compare different brines to see how the process was done, to see what's going to grow mold, what's not going to grow mold.... We also had the [name] native veterinarian come out and they allowed our kids to be sitting in on the process of spaying and neutering [mushing dogs]... [They are also developing the] life skill of how to keep yourself busy...and really just getting out and enjoying the sound of the sled and the tug that it always gives you.*

A middle school counselor encouraged the teachers to assign academic work that acknowledged tribes in the area so that students could see themselves and their culture as connected to academic work. She explained her rationale:

*A lot of the [American Indian and Alaska Native] kids...are just trying to figure out who they are, and it's a hard time for them. A lot of them are just trying to blend in with everybody else. It's really hard to own that native identity. It's important to show them that it's OK. We're still here.*

The principal of a Title VI-funded school provided a specific example of how he looked for connections between the native culture and the curriculum. He described how he would weave American Indian studies into American history by drawing on the parallels between the two experiences:

*If I was looking at the strategies of General Patton, who had tanks, [I would compare them to the Battle of Little Big Horn], where the Indians had horses and they had scouts.... They all had to have a battle plan. They all used terrain and maps... [Y]ou have to do scenarios like that to show that the strategies are the same; it's just that the instruments of war are different because of technology and time.*

BIE schools and tribes were more likely than school districts to support a culturally responsive education through a variety of practices. BIE and tribal grantees were more likely than district grantees to deliver instruction in students' native languages (68 percent vs. 28 percent), administer assessments in students' languages (38 percent vs. 12 percent), use American Indian and Alaska Native teachers and support staff (83 percent vs. 66 percent), and incorporate American Indian and Alaska Native history and culture into the curriculum (83 percent vs. 69 percent) (Exhibit 11).

**Exhibit 11. Title VI grantee practices to support culturally responsive education, by grantee type, 2017–18**

	School districts	BIE schools and tribes	Percentage point difference
Deliver instruction in AI/AN students' heritage language	28%	68%	40
Administer assessments in AI/AN languages	12	38	26
Use AI/AN teachers and support staff	66	83	17
Incorporate AI/AN history and culture into the curriculum	69	83	14

**Exhibit reads:** In 2017–18, 28 percent of district grantees and 68 percent of BIE schools and tribal grantees supported a culturally responsive education by delivering instruction in students' heritage language, a 40 percentage point difference.

Note: All differences between groups are statistically significant at  $p < .05$ . Analyses excluded respondents selecting "Not applicable" or "Don't know."

Source: Survey of Title VI Grant Coordinators, Item 16 (school districts  $n = 1,030$ ; BIE schools and tribes  $n = 120$ ; see Exhibit A-12 in the Technical Appendix).

Finally, grantees with larger awards were more likely than grantees with smaller awards to use multiple strategies to support culturally responsive education (Exhibit 12).

**Exhibit 12. Title VI grantee practices to support culturally responsive education, by grant award size, 2017–18**

	Larger awards (above median)	Smaller awards (below median)	Percentage point difference
Use AI/AN teachers and support staff	79%	55%	24
Connect students with mentors or counselors from the tribal community	58	38	20
Incorporate AI/AN history and culture into the curriculum	77	64	16
Deliver instruction in AI/AN students' heritage language	40	24	16
Administer assessments in AI/AN languages	19	10	9

**Exhibit reads:** In 2017–18, 79 percent of grantees with larger awards and 55 percent of grantees with smaller awards supported a culturally responsive education by using American Indian and Alaska Native teachers and support staff, a 24 percentage point difference.

Note: All differences between groups are statistically significant at  $p < .05$ . Analyses excluded respondents selecting "Not applicable" or "Don't know."

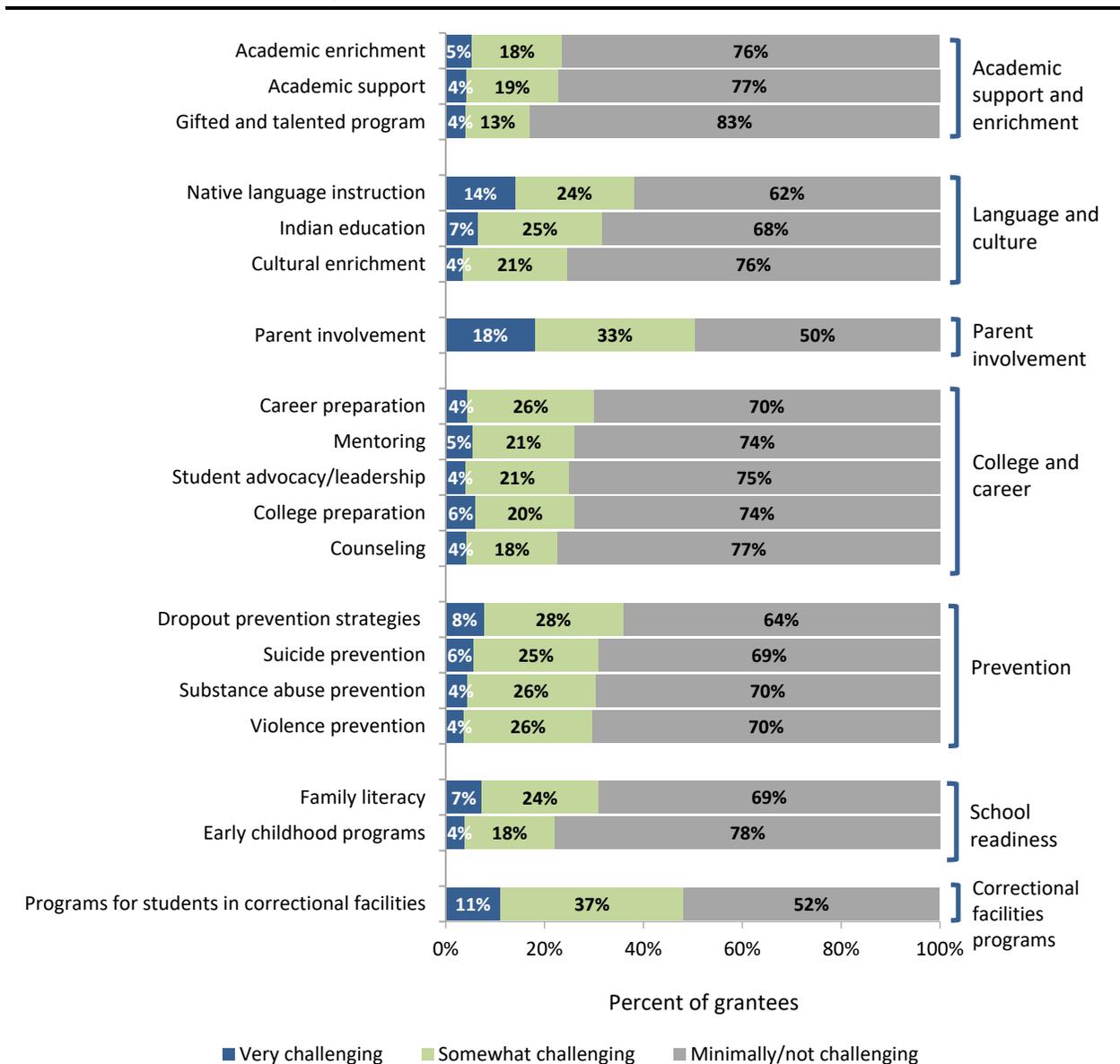
Source: Survey of Title VI Grant Coordinators, Item 16 (larger awards  $n = 592$ ; smaller awards  $n = 558$ ; see Exhibit A-13 in the Technical Appendix).

**The majority of grantees reported minimal or no challenges delivering their Title VI services using culturally responsive practices; yet, a sizable minority did report challenges in certain areas.**

Services that grant coordinators most often reported as somewhat challenging or very challenging to deliver using culturally responsive practices included parent involvement and programs for students in correctional facilities. Specifically, 51 percent of grantees who used grant funding to provide parent involvement services reported that using culturally responsive practices to do so was somewhat challenging (33%) or very challenging (18%); 48 percent of grantees who used grant funding to deliver

programs for students in correctional facilities reported that it was somewhat challenging (37%) or very challenging (11%) to use culturally responsive practices.

**Exhibit 13. Grantees reporting challenges to using culturally responsive practices to deliver Title VI-funded services, 2017–18**



**Exhibit reads:** In 2017–18, among grantees that provided academic enrichment, 5 percent reported that using culturally responsive practices to deliver academic enrichment was very challenging, 18 percent reported that it was somewhat challenging, and 76 percent reported that it was minimally challenging or not challenging.

Note: The number of respondents for this exhibit varies because the question was asked only of those respondents that reported providing each type of practice (see Exhibit 4). Analyses excluded respondents selecting “Not applicable” or “Don’t know.” Numbers may not add to 100% due to rounding.

Source: Survey of Title VI Grant Coordinators, Item 18 (n = 27–943; see Exhibit A-14 in the Technical Appendix).

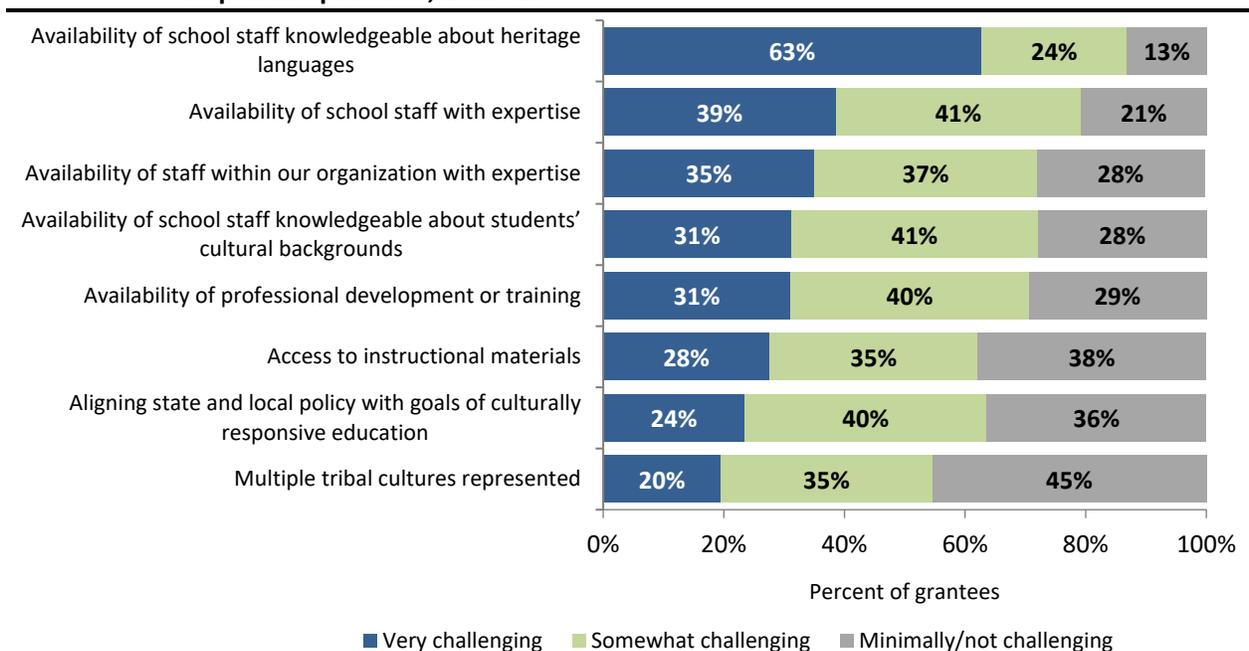
In addition, 38 percent of grantees providing native language instruction found this somewhat or very challenging to do using culturally responsive practices, as did 32 percent of those providing Indian

education (e.g., language and history). Case study grantees that served multiple tribes noted that they did not have the capacity to provide language instruction in all of the students’ native languages so, while they did provide native language instruction, they were not able to do so in a way that is culturally responsive *for all students*. Among grantees who reported delivering other types of services, more than 30 percent or more found it somewhat or very challenging to use culturally responsive practices for dropout prevention (36 percent), family literacy (31 percent), and suicide prevention (31 percent) (Exhibit 13).

**The greatest challenge in Title VI grantees’ delivery of services using culturally responsive practices was the availability of school staff with relevant knowledge of and expertise in native languages, culturally responsive education, and students’ cultural background.**

Of those grantees that found it somewhat or very challenging to deliver Title VI grant-funded services using culturally responsive practices (58 percent), most reported challenges with the availability of school staff knowledgeable about heritage languages (87 percent) or with expertise in culturally responsive education (80 percent) (Exhibit 14). Other factors were the availability of school staff knowledgeable about students’ cultural backgrounds (72 percent) or the availability of staff within their organization (e.g., school district, BIE, or tribe) with expertise in culturally responsive education (72 percent).

**Exhibit 14. Factors challenging grantees’ efforts to deliver Title VI-funded services using culturally responsive practices, 2017–18**



**Exhibit reads:** In 2017–18, among grantees who found using culturally responsive practices to deliver grant-funded services somewhat or very challenging, 63 percent reported that the availability of school staff knowledgeable about heritage languages was very challenging, 24 percent found it somewhat challenging, and 13 percent found it minimally challenging or not challenging.

Note: Only grantees that considered it “somewhat” or “very” challenging to deliver services using culturally responsive practices on Item 18 responded to this question. Analyses excluded respondents selecting “Not applicable” or “Don’t know.” Numbers may not add to 100% due to rounding.

Source: Survey of Title VI Grant Coordinators, Item 19 (n = 653; see Exhibit A-18 in the Technical Appendix).

A teacher interviewed at a case study site offered some insight into the specialized skills and investment of time required to provide a culturally responsive education. She explained that integrating native culture into a teacher's regular curriculum is difficult in terms of finding appropriate cultural materials, weaving the materials effectively into the instructional plan, and then striking a good balance between academics and culture. In another site, the Title VI grant coordinator said that the physical distance between the school and the tribe hindered the site's efforts to offer language classes at the school; the travel time between the tribe and the school meant that project staff members coming from the reservation were unable to visit the school frequently.

The types of challenges Title VI grantees confronted in delivering grant-funded services using culturally responsive practices varied by grantee type, with school districts reporting more significant challenges than BIE schools or tribes with the availability of staff with expertise within their organizations (74 percent of school districts and 54 percent of BIE schools and tribes identified this as somewhat or very challenging) and with the availability of school-based staff with knowledge of students cultural backgrounds (74 percent vs. 58 percent) (see Exhibit A-19 in the Technical Appendix).

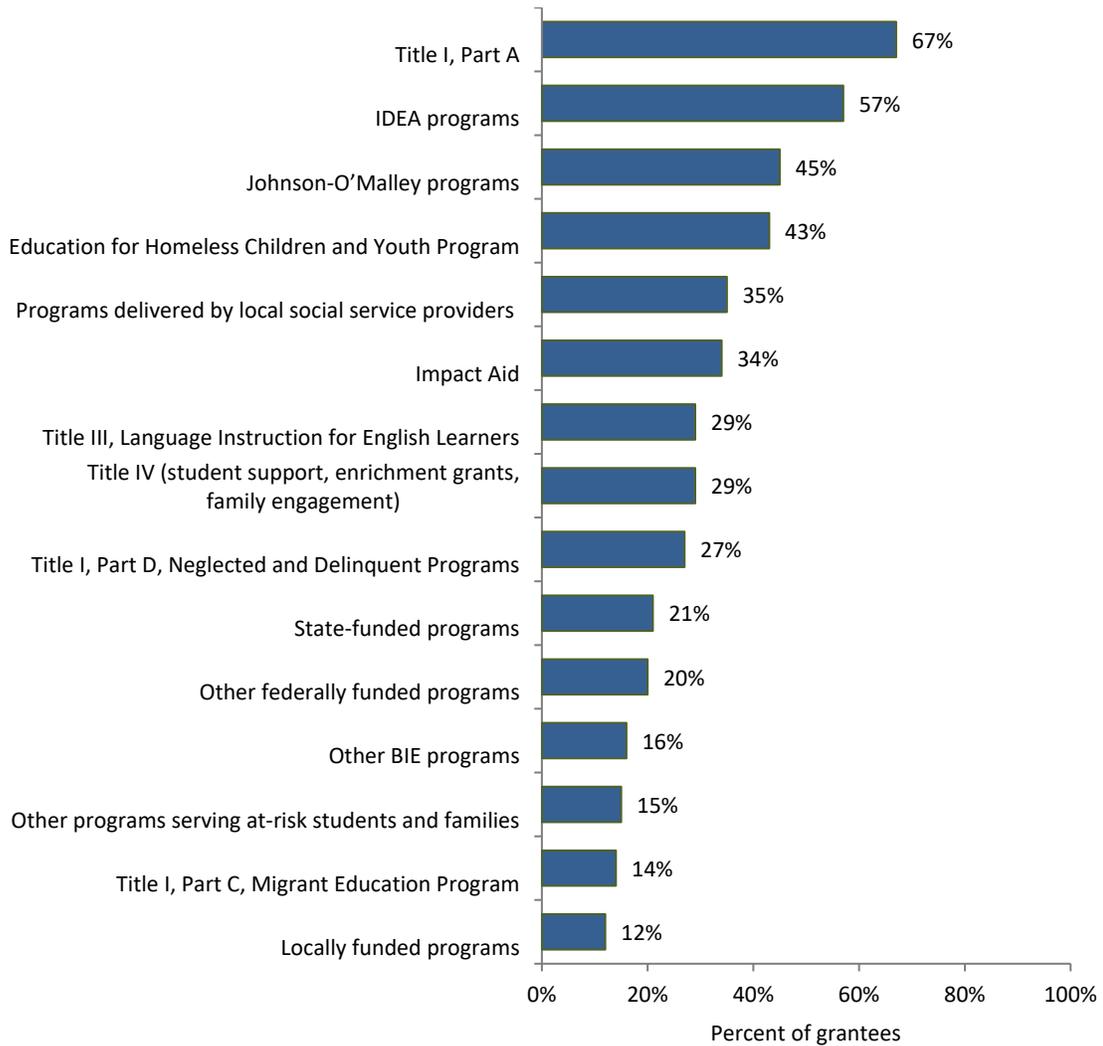
## Coordinating with Other Programs

Many federal, state, and local programs share the goal of improving academic outcomes for disadvantaged students. Title VI grants program funds must be supplemental, thus grantees are required to coordinate with other federal programs so as to create coherence and alignment across programs that serve many of the same students.

**The vast majority of grantees (89 percent) reported coordinating Title VI-funded services with at least one other program. The most common programs were Title I, Part A programs (67 percent), *Individuals with Educational Disabilities Act* programs (57 percent), and the BIE-funded Johnson-O'Malley programs (45 percent).**

Other programs with which the Title VI-funded services were commonly coordinated included the Education for Homeless Children and Youth program (43 percent), programs delivered by local social service providers (35 percent), and Impact Aid (34 percent) (Exhibit 15). Grantees less frequently coordinated Title VI-funded services with Title IV (student support and enrichment) (29 percent), Title III Language Instruction for English Learners (29 percent), and Title I, Part D Neglected and Delinquent Programs (27 percent).

**Exhibit 15. Federal, state, and local programs with which Title VI grantees coordinated grant-funded services and activities, 2017–18**



**Exhibit reads:** In 2017–18, 67 percent of grantees reported coordinating services and activities with Title I, Part A.

Note: The five programs referenced by their Title number (e.g., Title I, Part A) are authorized under the *Elementary and Secondary Education Act (ESEA)*. The Title IV programs covered in the survey questionnaire specifically included Student Support and Academic Enrichment Grants (Part A) and 21st Century Community Learning Centers (Part B).

Source: Survey of Title VI Grant Coordinators, Item 23 ( $n = 1,146$ ; see Exhibit A-21 in the Technical Appendix).

The size of the grant award was associated with differences in coordination with some federal programs. Grantees with larger awards were more likely than grantees with smaller awards to coordinate with programs such as Johnson-O'Malley (63 percent vs. 46 percent), the Education for Homeless Children and Youth Program (59 percent vs. 43 percent), and Title VI, Part D (43 percent vs. 29 percent) (Exhibit 16).

**Exhibit 16. Programs with which grantees coordinated Title VI-funded services and activities, by grant award size, 2017–18**

	Larger awards (above median)	Smaller awards (below median)	Percentage point difference
Johnson-O’Malley programs	63%	46%	17
Education for Homeless Children and Youth Program	59	43	16
Title I, Part D, Neglected and Delinquent Programs	43	29	14
Impact Aid	49	36	13
Title III, Language Instruction for English Learners	42	30	12
Title I, Part C, Migrant Education Program	23	15	8

**Exhibit reads:** In 2017–18, 63 percent of grantees with larger awards and 46 percent of grantees with smaller awards reported coordinating services and activities with Johnson-O’Malley programs, a 17 percentage point difference.

Note: All differences between groups are statistically significant at  $p < .05$ . Analyses excluded respondents selecting “Not applicable” or “Don’t know.” The three programs referenced by their Title number (e.g., Title I, Part D, Neglected and Delinquent Programs) are authorized under ESEA.

Source: Survey of Title VI Grant Coordinators, Item 23 (grantees with larger awards  $n = 545$ ; grantees with smaller awards  $n = 495$ ; see Exhibit A-22 in the Technical Appendix).

There were also differences by grantee type in the frequency with which Title VI projects were coordinated with other programs. BIE and tribes coordinated more frequently with some programs (e.g., Title I, Part D, Neglected and Delinquent Programs and *IDEA* programs), and school districts coordinated more frequently with others (e.g., Johnson-O’Malley programs and Impact Aid) (Exhibit 17).

**Exhibit 17. Programs with which grantees coordinated Title VI-funded services and activities, by grantee type, 2017–18**

	School districts	BIE schools and tribes	Percentage point difference
<b>More commonly done by BIE schools and tribes</b>			
Title I, Part D, Neglected and Delinquent Programs	34%	57%	23
<i>IDEA</i> programs	63	84	21
Title IV (student support, enrichment)	36	55	19
Programs delivered by local service providers	41	54	13
Title III, Language Instruction for English Learners	35	47	12
<b>More commonly done by districts</b>			
Johnson-O’Malley programs	57	40	17
Impact Aid	44	27	17

**Exhibit reads:** In 2017–18, 34 percent of district grantees and 57 percent of BIE and tribal grantees reported coordinating services and activities with Title I, Part D programs, a 23 percentage point difference.

Note: All differences between groups are statistically significant at  $p < .05$ . Analyses excluded respondents selecting “Not applicable” or “Don’t know.” The three programs referenced by their Title number (e.g., Title I, Part D, Neglected and Delinquent Programs) are authorized under ESEA. The Title IV programs covered in the survey questionnaire specifically included Student Support and Academic Enrichment Grants (Part A) and 21st Century Community Learning Centers (Part B).

Source: Survey of Title VI Grant Coordinators, Item 23 (school districts  $n = 940$ ; BIE schools and tribes  $n = 100$ ; see Exhibit A-23 in the Technical Appendix).

**The strategies grantees most commonly adopted to facilitate coordination with other programs included sharing data on students (76 percent) and sharing information on programs and services they believed to be effective (70 percent).**

Additional but slightly less commonly reported coordination strategies included sharing costs associated with providing services (61 percent) and building programmatic linkages among programs, agencies, and organizations (53 percent). Title VI grantees did not distinguish among programs when employing strategies to facilitate coordination of Title VI-funded services and activities. For example, more than half the grantees reported sharing data with each of 15 programs, including state-funded programs, Johnson-O'Malley programs, Title I Part A, and *IDEA* programs (see Exhibit A-24 in the Technical Appendix). Similarly, approximately half the grantees reported sharing information on programs and services they believed to be effective with most other programs, including state-funded programs, programs serving at-risk students and families, and Johnson-O'Malley programs.

In case study interviews, Title VI grant coordinators described coordinating funding with Title I, *IDEA* special education programs, Title III programs serving English learners, and Carl D. Perkins Career and Technical Education Improvement grants. One grantee coordinated Title III dollars and state dollars for English learners to support its native language program. Another grantee shared the cost of—and provided—professional development for paraprofessionals with the district's multilingual and special education departments. A principal in a third site described coordinating Title VI programming with funding from the Perkins program.

*It's not always a perfect fit, but if you're learning building skills and stuff like that, then that can apply to making the [culturally relevant product]. It's not exactly home construction or anything, but it's certainly vocational in the sense that there is money to be made in making the [culturally relevant product] and just life skills.*

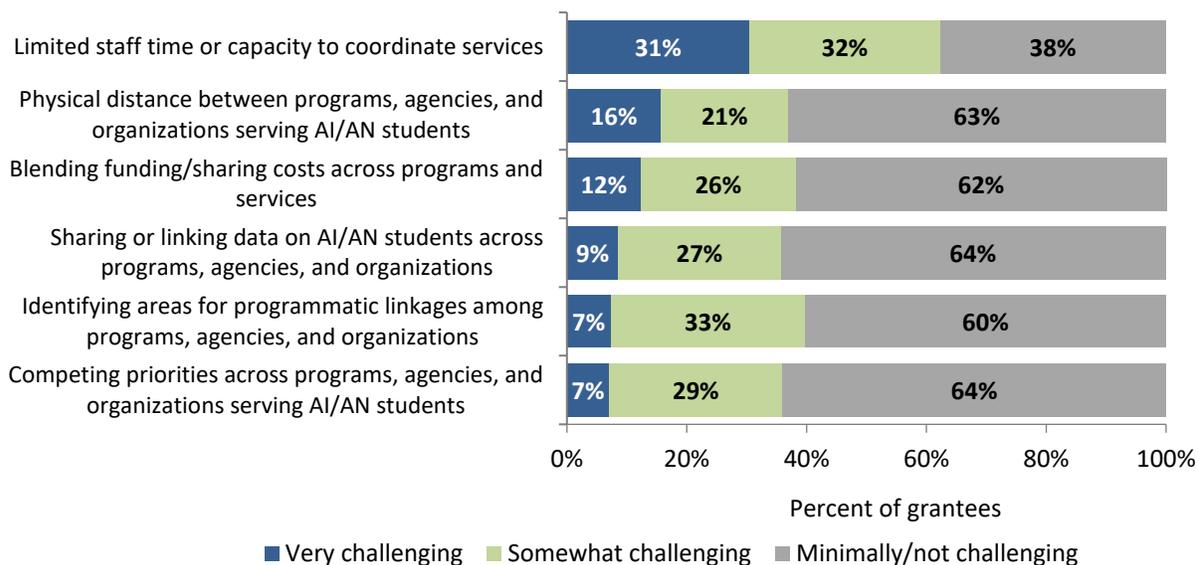
**Limited staff time and capacity were the greatest challenges to coordinating services across programs.**

Grantees faced challenges coordinating services across programs. Nearly a third (31 percent) of grantees reported that limited staff time or capacity to coordinate services was among the very challenging aspects of coordinating Title VI-funded services with other programs, while another third (32 percent) identified limited staff time or capacity as somewhat challenging (Exhibit 18).

In an interview, a grant coordinator described a challenge in coordinating Title VI-funded services with Johnson-O'Malley services. Even though they both serve American Indian and Alaska Native students, not all students are eligible for or enrolled in both programs and it can be a challenge to communicate to students and families why students may not be eligible for certain services. The grant coordinator explained:

*[Johnson-O'Malley has] a school clothing program and things like that, but if you are not a tribal member, you don't get help with that.... I deal with it all the time. I've got some girls [who] are enrolled [in a tribe] and some who aren't. Some of them get help with this, and then the others don't.*

**Exhibit 18. Grantees reporting challenges to coordinating Title VI-funded services with other programs, 2017–18**



**Exhibit reads:** In 2017–18, 31 percent of grantees reported that limited staff time or capacity was very challenging, 32 percent reported it was somewhat challenging, and 38 percent reported that limited staff time or capacity was either minimally challenging or not challenging to their efforts to coordinate with other federal, state, and local programs.

Note: Analyses excluded respondents selecting “Not applicable” or “Don’t know.” Numbers may not add to 100% due to rounding.  
Source: Survey of Title VI Grant Coordinators, Item 25 (n = 1039; see Exhibit A-28 in the Technical Appendix).

## Chapter Summary

Title VI grantees reported using the funding to support an array of activities and services intended to support American Indian and Alaska Native students’ education. Common Title VI-funded services included academic support such as homework and study skills assistance, cultural enrichment such as field trips and special events, and parent involvement. In their delivery of funded activities and services, grantees most frequently said they incorporated culturally responsive education practices by incorporating American Indian and Alaska Native history and culture into the curriculum and using American Indian and Alaska Native teachers and support staff. Efforts to deliver culturally responsive education were not without challenges, the most common being the availability of school staff knowledgeable about native language, with expertise in culturally responsive education, or knowledgeable about students’ cultural backgrounds. Finally, to improve coherence and alignment of services and activities, grantees reported coordinating their Title VI-funded services with other federal, state, and local programs. Coordination strategies included sharing information across services to address the needs of American Indian and Alaska Native students. Limited staff time or capacity to coordinate services was among the somewhat or very challenging aspects of coordinating Title VI-funded services with other programs.

## Chapter 3. Identifying Program-Eligible Children and Planning Services to Meet Their Needs

School districts, BIE-funded schools, tribes, Indian organizations, and Indian community-based organizations may apply for Title VI grants if they serve or represent a minimum number of eligible American Indian and Alaska Native children. Grant award amounts are based on the number of eligible children the grantee serves, so timely, accurate, and complete identification and counting of eligible children are critical.

In addition to the identification of program-eligible children, the Title VI Indian Education Formula Grants program requires school districts to plan services with the participation and approval of a committee of parents and family members of the children, tribal representatives, teachers, and students (*ESEA* § 6114(c)(4)) and to develop the program through meaningful collaboration with Indian tribes (*ESEA* § 6114(b)(7)). All grantees must base those services on a comprehensive assessment of “the unique educational and culturally related academic needs of the Indian students for whom the local educational agency is providing an education” (*ESEA* § 6114(c)(3)(A)) and plan services through “open consultation with parents of Indian children and teachers, representatives of Indian tribes..., and, if appropriate, Indian students from secondary schools, including through public hearings” (*ESEA* § 6114(c)(3)(C)).

This chapter describes grantees’ practices for identifying and counting program-eligible children and planning services in collaboration with stakeholders and based on an assessment of student needs. Also discussed are the challenges grantees reported in these endeavors.

### Identifying Program-Eligible Children

As Title VI funding is calculated with a formula based on the number of eligible students, the identification of eligible students directly influences the amount of a Title VI grantee’s funding. The Office of Indian Education has issued an OMB-approved form entitled “Title VI ED 506 Student Eligibility Certification Form” (ED 506 form) which school districts must use for this purpose (the form is available in Appendix C of Volume II of this report). This form includes the statutory definition of Indian:

*[A]n individual who is (1) A member of an Indian tribe or band, as membership is defined by the Indian tribe or band, including any tribe or band terminated since 1940, and any tribe or band recognized by the State in which the tribe or band resides; (2) A descendant of a parent or grandparent who meets the requirements described in paragraph (1) of this definition; (3) Considered by the Secretary of the Interior to be an Indian for any purpose; or (4) An Eskimo or Aleut or other Alaska Native; or (5) A member of an organized Indian group that received a grant under the Indian Education Act of 1988 as it was in effect October 19, 1994.*

The form requires families to provide the name of the tribe or band for which their child (or child’s parent or grandparent) claims membership and to provide proof of enrollment through either a

membership or enrollment number “if readily available” or “other evidence of membership.”<sup>7</sup> Grantees must maintain on file a form for each eligible student that contains the elements required by the statute, though the form only needs to be completed once and can stay on file for the duration of the student’s education as part of their education record.

All Title VI grantees except for BIE-funded schools are required to use the ED 506 form to document eligible students. BIE-funded schools have the option of using either the Indian Education School Equalization Program (ISEP) count (using the most current BIE-certified Indian student count) or ED 506 form. Of the BIE schools that participated in the survey, 89 percent used the ISEP count and 11 percent used the ED 506 form.

### ***Strategies Used to Identify Eligible Students***

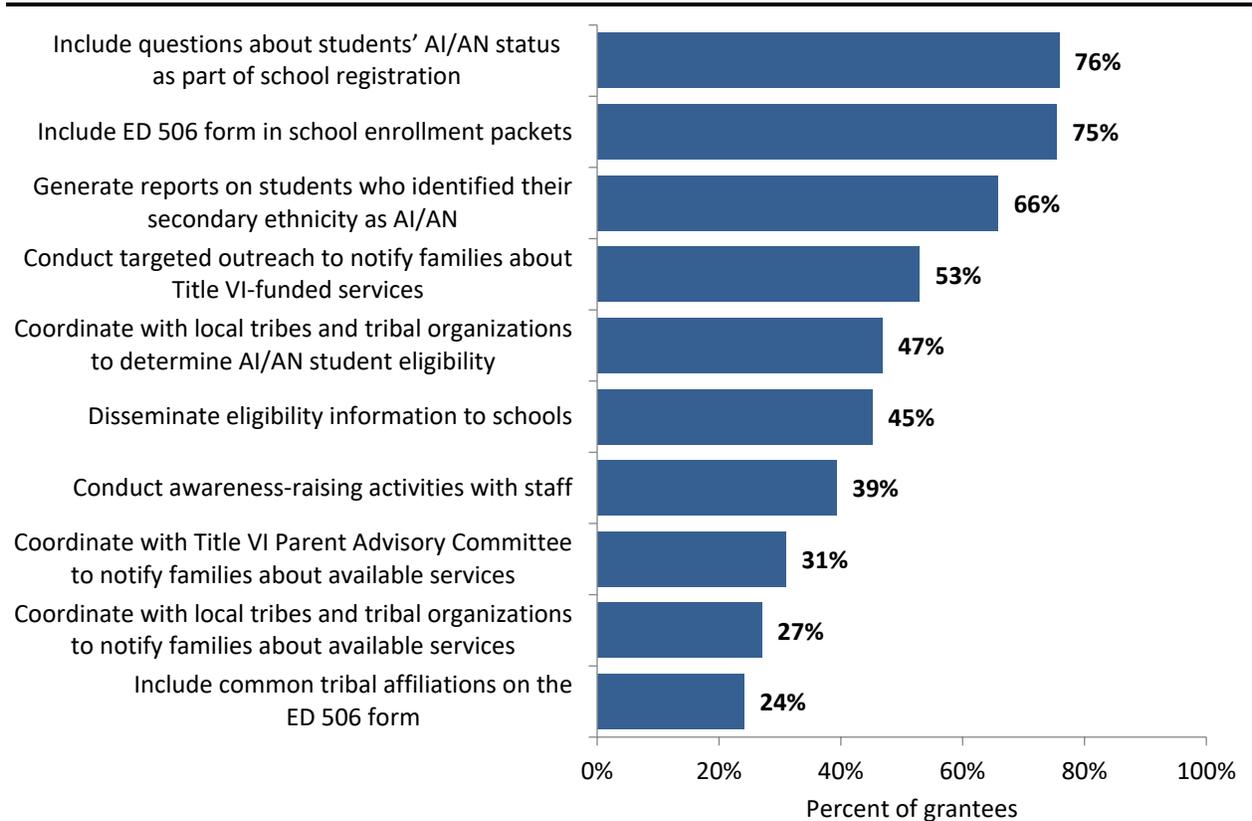
**Most grantees reported relying on three strategies to identify eligible students: (1) including questions about students’ American Indian and Alaska Native status in the school registration process, (2) including ED 506 forms in enrollment packets, and (3) generating reports for students who were identified as American Indian and Alaska Native on enrollment forms.**

Three fourths of grantees reported including questions about students’ American Indian and Alaska Native status in the school registration process (76 percent) and including the ED 506 form in school enrollment packets (75 percent) (Exhibit 19). In case study interviews, a school administrator commented that asking about student status in the school registration process was a more systematic process to identify students that did not depend on staff judgment or knowledge. Another district administrator explained that they used an online registration system that automatically directed people to the ED 506 form if they selected American Indian or Alaska Native (either on its own or in combination with other race/ethnicities).

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<sup>7</sup> The Office of Indian Education provide the following guidance for cases in which a student’s tribal enrollment membership number: “Tribal enrollment criteria are set forth in tribal constitutions, articles of incorporation or ordinances. The criterion varies from tribe to tribe, so uniform membership requirements do not exist. Each tribe determines whether an individual is eligible for membership and maintains its own enrollment records and records about past members. Some tribes require conditions such as tribal blood quantum, tribal residency, or continued contact with the tribe. To obtain information about tribal enrollment documentation, you must contact the tribe. More information can be found at <https://www.doi.gov/tribes/enrollment>” (U.S. Department of Education 2019).

**Exhibit 19. Strategies grantees used to identify students eligible to receive Title VI-funded services, 2017–18**



**Exhibit reads:** In 2017–18, 76 percent of grantees included questions about students’ American Indian and Alaska Native status as part of the school registration process.

Note: BIE schools that used the ISEP count in place of the ED 506 form did not respond to this question.

Source: Survey of Title VI Grant Coordinators, Item 2 (*n* = 1,071; see Exhibit A-31 in the Technical Appendix).

The third most commonly reported strategy was to generate reports on students who identify as American Indian and Alaska Native (66 percent of grantees). For example, in case study interviews a grantee staff member from a district consortium reported searching the data system to see which students identified as American Indian or Alaska Native on enrollment forms and then mailing and emailing an ED 506 form to their families. In another district, the online enrollment system collected demographic information about students, which grantee staff used to identify families who should complete the ED 506 form.

Other common strategies included conducting targeted outreach to families (53 percent) and collaboration between school districts and local tribes and tribal organizations (47 percent). For example, in case study interviews, a grantee staff member commented that parents sometimes did not know about the Title VI program and explained the importance of having someone they trust reach out to them. A Title VI-funded teacher at another site noted that relying on staff known to the community helped with these outreach efforts: “It goes back to being somebody from the community, somebody that they trust.... Somebody who is looking out for their child and is trying to do what’s best to help them.” Case study participants also provided examples of how collaboration between school districts

and local tribes to build positive relationships with families can ease the process of identifying students and getting completed ED 506 forms. For example, a staff member from a tribe grantee described how they had worked with school district staff during the past three years to build trust and relationships with families, participating in enrollment activities at the various school districts that serve the tribe’s students and explaining to parents the need for the ED 506 form. However, the interviewee commented that this strategy was not feasible for collaborating with districts that serve small numbers of eligible students and are located too far from the tribe to use this in-person approach to build relationships.

The strategies grantees used to identify eligible students also varied by grant award size. For example, grantees with larger awards were more likely than those with smaller awards to report coordinating with local tribes and tribal organizations to notify families about available services (35 vs. 19 percent) and determine student eligibility for services (54 percent vs. 40 percent); conducting awareness-raising activities such as trainings, presentations, or meetings (46 percent vs. 32 percent); and coordinating with the Title VI Parent Advisory Committee to notify families about available Title VI-funded services (37 percent vs. 24 percent) (Exhibit 20).

**Exhibit 20. Strategies grantees used to identify students eligible to receive Title VI-funded services, by grant award size, 2017–18**

	Larger awards (above median)	Smaller awards (below median)	Percentage point difference
Coordinate with local tribes and tribal organizations to notify families about available services	35%	19%	16
Collaborate and coordinate with local tribes and tribal organizations to determine AI/AN student eligibility	54	40	14
Conduct awareness-raising activities	46	32	14
Coordinate with Title VI Parent Advisory Committee to notify families about available services	37	24	13
Disseminate eligibility information to schools	50	40	10
Include ED 506 form in school enrollment packets	80	71	9
Coordinate with school or tribal-based committees to notify families about available services	26	18	8

**Exhibit reads:** In 2017–18, 35 percent of grantees with larger grant awards (above the median) and 19 percent with smaller awards coordinated with local tribes and tribal organizations to notify families about available services, a 16 percentage point difference.

Note: All differences between groups are statistically significant at  $p < .05$ . BIE schools that used the ISEP count in place of the ED 506 form did not respond to this question.

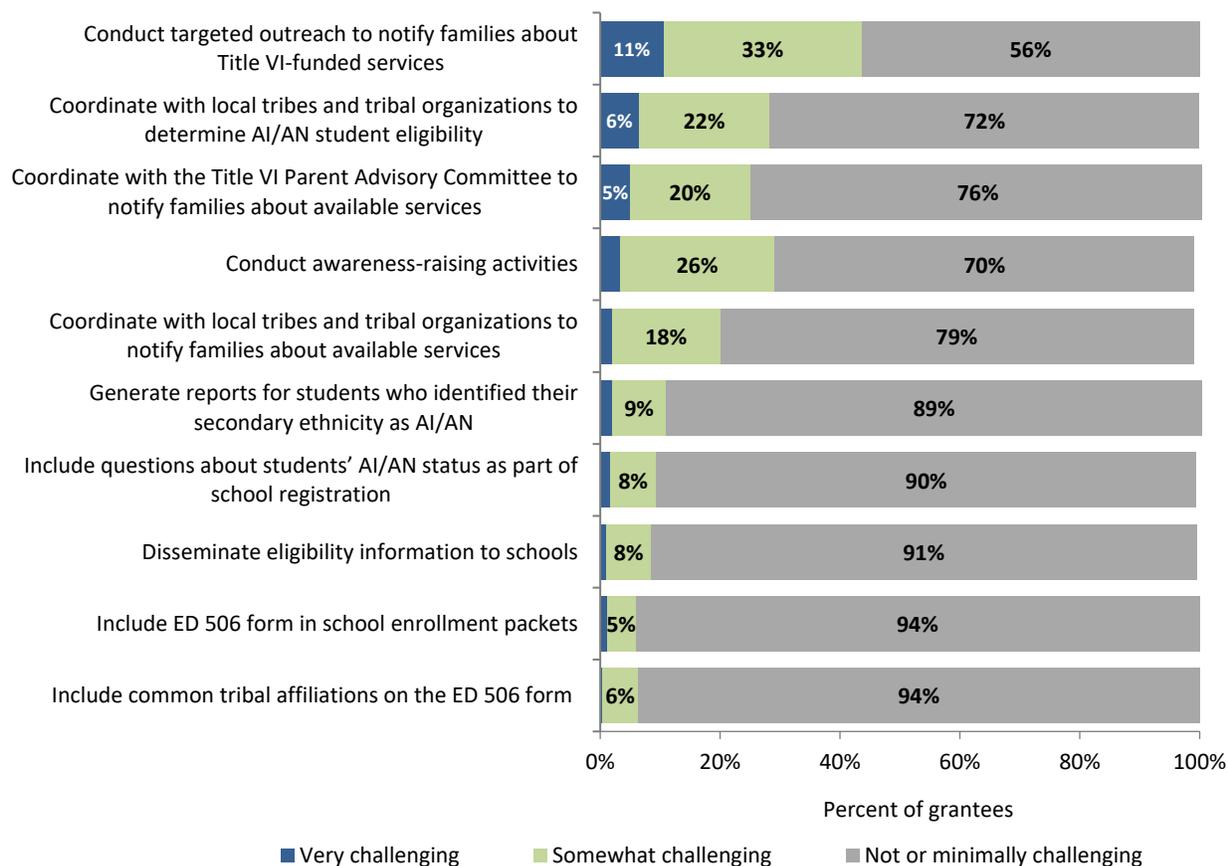
Source: Survey of Title VI Grant Coordinators, Item Q2 ( $n = 1,071$ ; see Exhibit A-32 in the Technical Appendix).

**The majority of grantees indicated that they did not experience significant challenges with the strategies they used to identify eligible children. However, challenges remain for some.**

Among Title VI grantees that conducted targeted outreach (e.g., by phone or email) to notify families about grant-funded services for eligible children, 44 percent reported that it was somewhat challenging (33 percent) or very challenging (11 percent) (Exhibit 21). In interviews, several grantees also said that conducting targeted outreach required significant staff time and resources. One grant coordinator noted that reaching out to families to collect ED 506 forms was time intensive, commenting, “All of my staff

have to chase forms. My office staff is chasing forms. Our school district personnel are chasing forms. All of that time and effort is [spent] away from our students.” A teacher at this site explained how she built at least one hour a week into her schedule—and a lot more time at the beginning of the school year—to collect ED 506 forms.

**Exhibit 21. Title VI grantees reporting challenges with strategies to identify eligible children, 2017–18**



**Exhibit reads:** In 2017–18, among Title VI grantees that conducted targeted outreach to notify American Indian and Alaska Native families about available grant-funded services for eligible students, 11 percent reported that conducting targeted outreach was very challenging, 33 percent reported it was somewhat challenging, and 56 percent reported it was minimally challenging or not challenging.

Note: BIE schools that used the ISEP count in place of the ED 506 form did not respond to this question. The number of respondents for this exhibit varies because the question was asked only of those respondents that reported using each strategy to identify Title VI-eligible children (see Exhibit 19). Numbers may not add to 100% due to rounding.

Source: Survey of Title VI Grant Coordinators, Item 3 (n = 114–808; see Exhibit A-34 in the Technical Appendix).

Targeted outreach could also be challenging in cases where families did not trust public officials, including school staff. For example, one interviewee explained that some parents lacked trust in the government and were cautious about providing the information requested on the ED 506 form: “I have had parents that say... ‘What is this form?’ It’s very intimidating to them. It’s a government form. They look at it and say, ‘I am not signing anything.’ Because they do not want to divulge...[their] tribal ID number...because that’s like your Social Security number.”

Title VI grant coordinators reported varied experiences in collaborating and coordinating with local tribes and tribal organizations to determine student eligibility for services. Although about a quarter of coordinators reported that this type of collaboration was somewhat challenging (22 percent) or very challenging (6 percent), 72 percent indicated that it was not challenging or minimally challenging. Some examples from the case study interviews shed light on how the degree of challenge was associated with relationship building. A staff member at one case study site noted that where they had existing relationships with tribal administrators, they could probably receive help with the ED 506 forms, but establishing new relationships took effort. She commented, “A lot of it is just taking the time to do it. That’s really what it is, planning and making it happen.” In contrast, a tribal education department staff member at a case study site said that such collaboration and coordination were not at all challenging, citing a high level of trust and a positive relationship between the tribe and schools. The staff member noted:

*It hasn’t been a challenge because the secretaries and the administrators [at the schools] that we work with, they already know what the process is and they are not hesitant to give us that information. We just call them up or I’ll email them and say, “I need the numbers. I am doing the Title VI application.” Then, either they do it that day or the next day, but it’s really easy. I haven’t seen a challenge in trying to get the numbers. It’s been very easy to get everything.*

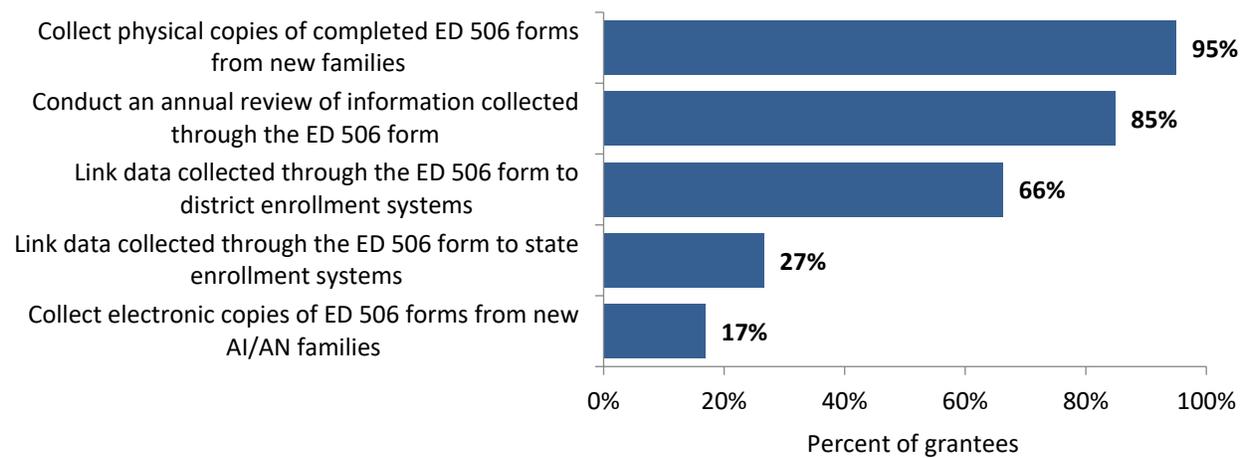
### **Strategies Used to Confirm the Accuracy and Completeness of ED 506 Forms**

As described, the ED 506 form is required for each student to receive Title VI-funded services (except at BIE-funded schools). Two items of information required on the ED 506 form are the name of the student’s tribe and proof of tribal membership.

**To confirm the accuracy and completeness of the information collected on the ED 506 forms, most grantees collected physical copies of eligibility forms and conducted annual reviews to update information on eligible students.**

Nearly all grantees (95 percent) collected physical copies of ED 506 forms from families to confirm that the forms were accurate and complete. Most grantees conducted an annual review of information collected on the ED 506 forms to remove students who had left the district and any duplicate entries (85 percent), and the majority reported linking data collected through ED 506 forms to district student enrollment systems (66 percent) to verify the data (e.g., to confirm continued enrollment). Fewer Title VI grantees reported linking data collected through the ED 506 form to state student enrollment systems (27 percent) or collecting electronic copies of the ED 506 form from new American Indian or Alaska Native families (17 percent) (Exhibit 22).

**Exhibit 22. Strategies grantees used to confirm accuracy and completeness of the data collected on the ED 506 forms, 2017–18**



**Exhibit reads:** In 2017–18, 95 percent of grantees collected physical copies of completed ED 506 forms from new American Indian and Alaska Native families to promote that the data collected from the forms were accurate and complete.

Note: BIE schools that used the ISEP count in place of the ED 506 form did not respond to this question.

Source: Survey of Title VI Grant Coordinators, Item 5 ( $n = 1,039$ ; see Exhibit A-37 in the Technical Appendix).

In interviews, grantees attributed the low incidence of using online forms to parents and guardians not having computer or Internet access, parents and guardians being less familiar and comfortable using technology, and less opportunity for in-person contact and relationship-building, which can be important for obtaining completed ED 506 forms. One grantee staff member who described entering paper ED 506 forms into an online system noted that the community was not ready to adopt a fully online system. This respondent explained, “Probably 20 percent of our district has Internet access at home and has the tech savvy ability to actually do this, and then it falls apart.... I think we are going to be at the paper form stage for a while yet.”

Grantee staff members at another site described some of the challenges associated with using an online registration system and ED 506 forms, which were linked to an initial decline in the number of completed 506 forms. A teacher explained, “Most of the time, when you are rural and high poverty, a computer scares the devil out of you. Especially if you’re 30 and older.... When they have to register on a computer, already it’s intimidating to them.” In response to this challenge, the grant coordinator attached a letter to a physical copy of the 506 form that explained the form and addressed some frequently asked questions, such as “What if I’m only part Indian?” The grant coordinator at this site also explained that before moving to an online system, “When the individuals came into the school and you were seeing them face-to-face, you could say, ‘Don’t forget to complete this 506 or don’t forget to check here,’” which was not the case when using an online form. Although this grantee experienced challenges during the initial transition to an online system, within a year they were able to address some of the concerns and began to see the benefits of using an online ED 506 form.

This grantee refined their approach for communicating with parents about the electronic ED 506 form via school websites, newsletters, and Facebook, which helped them reach more parents. This grantee also attached the electronic ED 506 form to the electronic version of registration documents, which

improved dissemination of the form. The grant coordinator explained how use of the electronic ED 506 form eventually led to greater benefits including increased identification of eligible students, an increased number of collected applications, and improved efficiency collecting and storing this information. For example, after improving strategies for disseminating the electronic ED 506 form, this grantee identified 300 additional students. With respect to improved efficiencies, parents could more easily complete the form without having to travel to the school, which was often difficult for parents who did not have the time or access to transportation. In some cases, it was easier for parents to complete the online application at a tribal office versus at the school. The grant coordinator explained that the electronic ED 506 form and its associated online database also made it easier to compile and track information. The computer system could count the number of identified students who were eligible for the Title VI program. Further, it could track when children eligible for Title VI services changed schools. Parents could also upload the documents used to substantiate tribal membership, so that district and school personnel did not have to keep track of paper forms that might get lost.

Grantees with larger awards were more likely than those with smaller awards to link data through the ED 506 forms to district enrollment systems (73 percent vs. 59 percent) and collect electronic ED 506 forms from new families (23 percent vs. 10) (Exhibit 23).

**Exhibit 23. Title VI grantee strategies to promote accuracy and completeness of the data collected through the ED 506 forms, by grant award size, 2017–18**

	Larger awards (above median)	Smaller awards (below median)	Percentage point difference
Link data collected through ED 506 form to district enrollment system	73%	59%	14
Collect electronic copies of ED 506 forms	23	10	13
Conduct an annual review of information collected through the ED 506 form	88	81	7
Collect physical copies of completed ED 506 forms	97	93	4

**Exhibit reads:** In 2017–18, 73 percent of grantees with larger awards and 59 percent of grantees with smaller awards linked data collected through the ED 506 form to the district student enrollment system, a 14 percentage point difference.

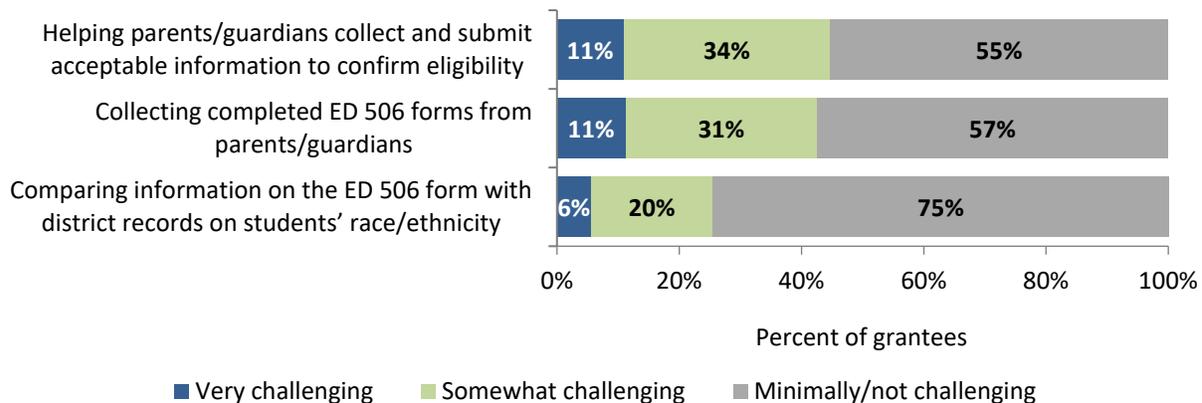
Note: All differences between groups are statistically significance at  $p < .05$ . BIE schools that used the ISEP count in place of the ED 506 form did not respond to this question.

Source: Survey of Title VI Grant Coordinators, Item 5 (grantees with larger awards  $n = 541$ ; grantees with smaller awards  $n = 498$ ; see Exhibit A-38 in the Technical Appendix).

**More than two in five grantees reported that helping parents and guardians collect and submit acceptable information to confirm their child’s eligibility was somewhat or very challenging.**

Grantees had mixed experiences in their efforts to identify eligible children. For example, while fewer than half (45 percent) reported that helping parents and guardians collect and submit acceptable information (e.g., tribal membership or enrollment number, letter from tribe) to confirm their child’s eligibility to receive Title VI-funded services was somewhat or very challenging, more than half (55 percent) found that helping parents collect and submit information was minimally challenging or not challenging (Exhibit 24).

**Exhibit 24. Title VI grantees reporting challenges using strategies to promote accuracy and completeness of the data collected through the ED 506 forms, 2017–18**



**Exhibit reads:** In 2017–18, 11 percent of grantees reported that helping parents/guardians collect and submit acceptable information to confirm their child’s eligibility to receive grant-funded services was very challenging, 34 percent reported that this was somewhat challenging, and 55 percent reported that this was minimally challenging or not challenging.

Note: Analyses excluded respondents selecting “Not applicable” or “Don’t know.” Numbers may not add to 100% due to rounding. Source: Survey of Title VI Grant Coordinators, Item 6 (n = 1,024; see Exhibit A-40 in the Technical Appendix).

In interviews, grantee staff members at two sites said that obtaining the information that they understood to be required to provide proof of tribal membership (in this case, tribal enrollment card or documentation of native blood)<sup>8</sup> made it difficult for parents/guardians to acquire documentation to confirm their child’s eligibility to receive Title VI-funded services and collect complete ED 506 forms. For instance, school counselors at one case study site stated that students often are not able to locate their Certificate of Indian Blood and that if parents no longer have it, they do not always see the value in putting in the effort to obtain a new one. One counselor at this site said that gathering the documentation (for example, a birth certificate) to complete the ED 506 form requires time and money. Parents at two case study sites described similar challenges with obtaining completed forms. One parent said, “Some people probably got a roll card when they were kids and don’t know what their roll numbers are. They don’t know where the card is. It’s a matter of going over there and either getting a new card or asking what your roll number is.”

Grantee staff at one case study site explained that enrolling children who are in foster care can pose particular challenges with documentation. These staff said that because children in foster care often have no contact with parents, they may not have their Certificate of Indian Blood or tribal enrollment information, and foster parents who try to get services to benefit these children may struggle to obtain the necessary documentation.

<sup>8</sup> Note that these specific documents are not required under the Title VI statute. Under the Title VI statute, the ED 506 form for a child may use alternative evidence of tribal membership.

## Planning Services

The Title VI program has required engaging parents and the community in planning grant-funded services since its inception in 1972. In the 1994 reauthorization of *Elementary and Secondary Education Act (ESEA)*, grant requirements were amended to include “a comprehensive plan to meet the academic and culturally related academic needs of American Indian and Alaska Native students.” School district grantees must provide assurances that these plans were developed based on a needs assessment and approved by an advisory committee. Because at least half (a majority) of the members must be parents, these advisory committees are often referred to as “Parent Committees.”<sup>9</sup> The Title VI legislation also calls for teachers as well as students (if appropriate) to serve on the committees. Under the 2015 reauthorization of *ESEA*, the *Every Student Succeeds Act (ESSA)*, grantees are also required to include tribal representatives on these advisory committees.

*ESSA* further sought to increase collaboration between school districts and local tribes, requiring that the district’s comprehensive plans describe “the process the local educational agency used to meaningfully collaborate with Indian tribes located in the community in a timely, active, and ongoing manner in the development of the comprehensive program and the actions taken as a result of such collaboration” (*ESEA* § 6114(b)(7)) and that all grantees provide assurance that the plan was developed in open consultation with representatives of Indian tribes or Indian organizations in addition to other stakeholders (*ESEA* § 6114(c)(3)(C)).

### **Assessing Students’ Needs**

Title VI-funded services are to be based on a “comprehensive local assessment and prioritization of the unique educational and culturally related academic needs of the Indian students” (*ESEA* § 6114(c)(3)(A)). Both the needs assessment and the planning process involve gathering information and input from stakeholders.

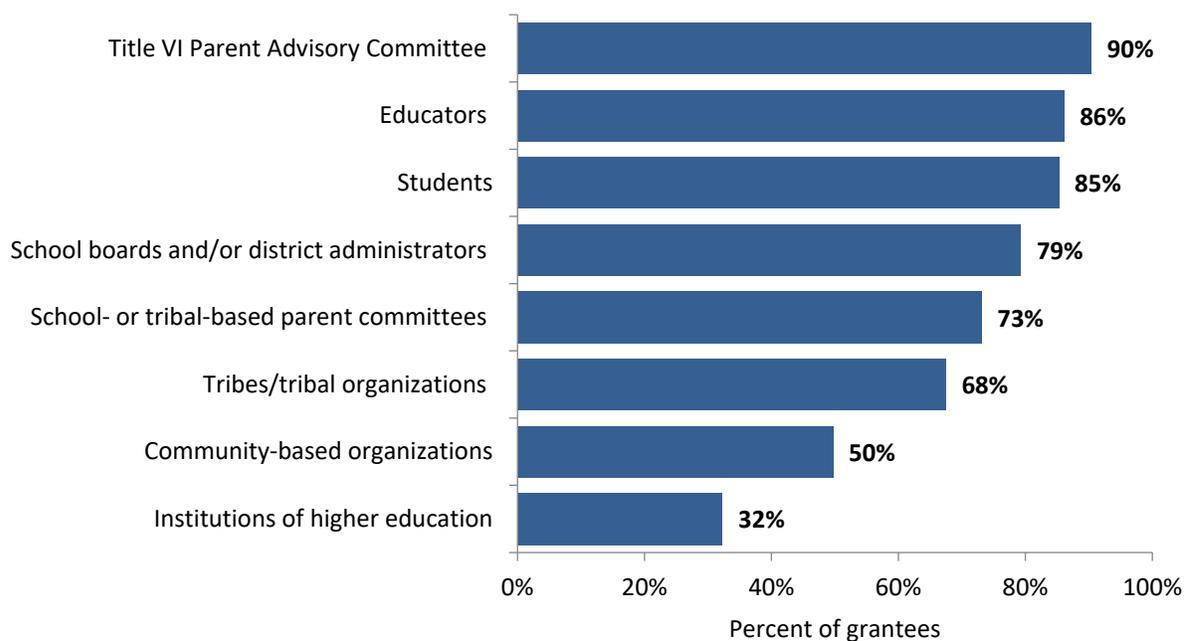
**More than two thirds of grantees reported collecting information about students’ needs from parent committees, educators, students, and tribes.**

In conducting the needs assessment, grantees most commonly collected information from a Title VI Parent Advisory Committee, educators (i.e., schools administrators, teachers), students, school boards and/or district administrators, school- or tribe-based parent committees, and tribes and tribal organizations (Exhibit 25).

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<sup>9</sup> The study survey referred to the required advisory committee as the Title VI Parent Advisory Committee.

**Exhibit 25. Stakeholder groups from which Title VI grantees collected information, 2017–18**



**Exhibit reads:** In 2017–18, among grantees that collected information from stakeholder groups, 90 percent collected information from the Title VI Parent Advisory Committee.

Note: Grantees that indicated on Item 9 that they did not consult with any stakeholders to identify American Indian and Alaska Native students' needs did not answer this question.

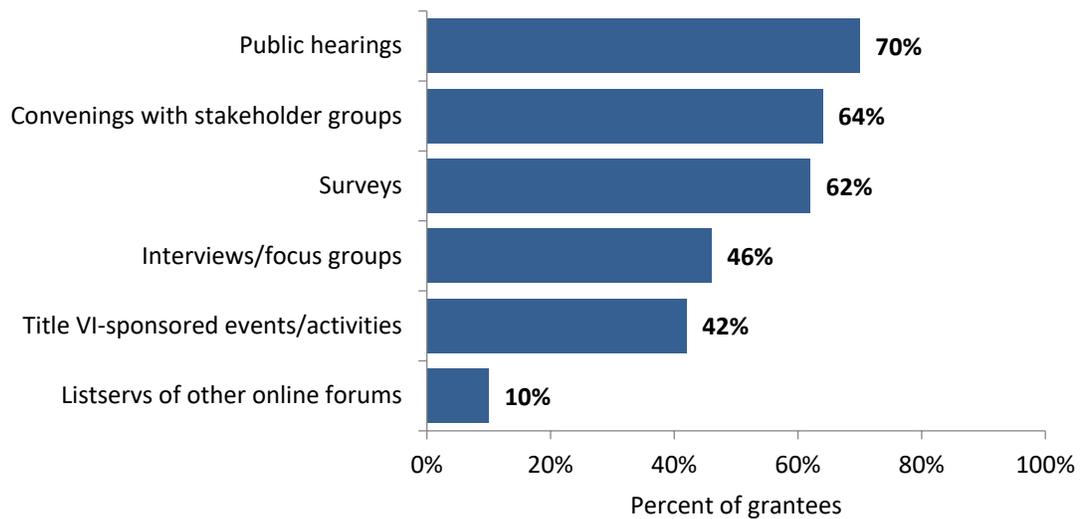
Source: Survey of Title VI Grant Coordinators, Item 9 (*n* = 972; see Exhibit A-43 in the Technical Appendix).

Grantees with larger awards were more likely than grantees with smaller awards to collect information from tribes/tribal organizations (77 percent vs. 57 percent) and institutes of higher education (40 percent vs. 25 percent) (see Exhibit A-44 in the Technical Appendix). School district grantees were more likely than BIE schools and tribes to collect information from Parent Advisory Committees (94 percent vs. 62 percent) and tribes/tribal organizations (71 percent vs. 31 percent) (see Exhibit A-45 in the Technical Appendix). It is expected that school districts are more likely to collect information from Parent Advisory Committees because BIE schools and tribes do not have the same requirement to collaborate with the advisory committees.

**Common methods for collecting information from stakeholders were public hearings, convenings with stakeholder groups, and surveys.**

In conducting their needs assessments, grantees used a variety of strategies to collect information from key stakeholders (Exhibit 26). They tended to rely on face-to-face communication such as public hearings (70 percent) and convenings (64 percent), although many also used surveys (62 percent).

**Exhibit 26. Strategies Title VI grantees used to collect information from stakeholder groups, 2017–18**



**Exhibit reads:** In 2017–18, among grantees that collected information from stakeholder groups, 70 percent collected information from stakeholder groups through public hearings.

Note: Grantees that indicated on Item 9 that they did not consult with any stakeholders to identify American Indian and Alaska Native students’ needs did not answer this question.

Source: Survey of Title VI Grant Coordinators, Item 9 (*n* = 945; see Exhibit A-46 in the Technical Appendix).

Grantees with larger awards were more likely than grantees with smaller awards to administer surveys, hold public hearings, and gather information at Title VI-sponsored events (Exhibit 27).

**Exhibit 27. Strategies Title VI grantees used to collect information from stakeholder groups, by grant award size, 2017–18**

	Larger awards (above median)	Smaller awards (below median)	Percentage point difference
Surveys	70%	52%	18
Public hearings	76	62	14
Title VI-sponsored events or activities	51	32	19

**Exhibit reads:** In 2017–18, among grantees that collected information from stakeholder groups, 70 percent of grantees with larger awards and 52 percent of grantees with smaller awards collected information from stakeholder groups through surveys, an 18 percentage point difference.

Note: All differences between groups are statistically significant at *p* < .05. Grantees that indicated on Item 9 that they did not consult with any stakeholders to identify American Indian and Alaska Native students’ needs did not answer this question.

Source: Survey of Title VI Grant Coordinators, Item 9 (grantees with larger awards *n* = 496; grantees with smaller awards *n* = 449; see Exhibit A-47 in the Technical Appendix).

School district grantees were more likely than BIE schools and tribes to convene stakeholder groups, hold public hearings, and gather information at Title VI-sponsored events (Exhibit 28).

**Exhibit 28. Strategies Title VI grantees used to collect information from stakeholder groups, by grantee type, 2017–18**

	School districts	BIE schools and tribes	Percentage point difference
Public hearings	73%	41%	32
Convenings with stakeholder groups	66	51	15
Title VI-sponsored events or activities	43	30	13

**Exhibit reads:** In 2017–18, 73 percent of district grantees and 41 percent of BIE and tribal grantees held public hearings, a 32 percentage point difference.

Note: All differences between groups are statistically significant at  $p < .05$ . Grantees that indicated on Item 9 that they did not consult with any stakeholders to identify American Indian and Alaska Native students’ needs did not answer this question.

Source: Survey of Title VI Grant Coordinators, Item 9 (school districts  $n = 852$ ; BIE schools and tribes  $n = 93$ ; see Exhibit A-48 in the Technical Appendix).

### ***Parent Advisory Committees: Composition and Role***

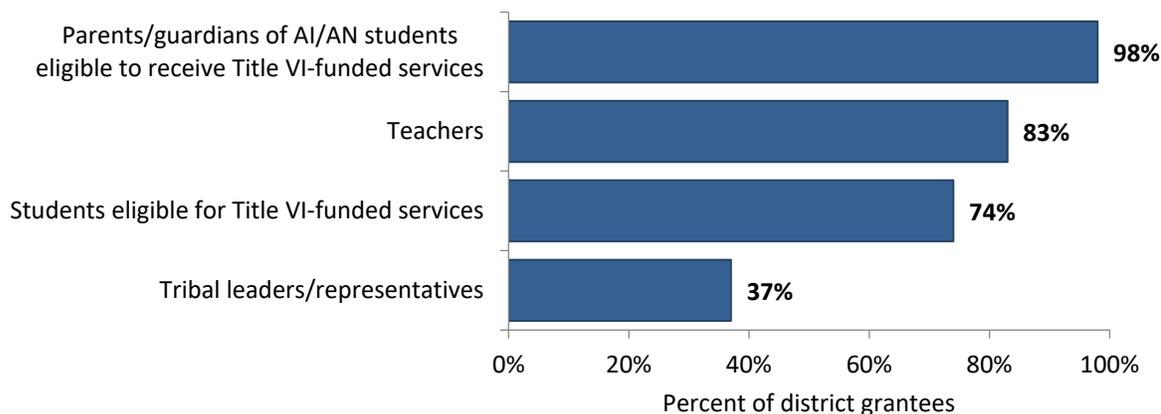
All school district grantees are required to have a Parent Advisory Committee that is made up of parents or family members, who must represent a majority, as well as representatives of Indian tribes, teachers, and, if appropriate, secondary school students.

**Most Parent Advisory Committees included parents, teachers, and students, while fewer than two in five included tribal representatives; they convened with varying frequency, from annually to monthly.**

As required by law, most grantee districts’ Title VI Parent Advisory Committees included multiple stakeholders: 98 percent of grantee districts reported that parents were represented, 83 percent reported that teachers served on the committee, 74 percent said they had student representation, and 37 percent included tribal leaders/representatives (Exhibit 29).

Grantees with larger awards were more likely than grantees with smaller awards to include students and tribal representatives on their Parent Advisory Committee (see Exhibit A-50 in the Technical Appendix). One case study site with a large award had a specific number of representatives for each group: six parents, two teachers, and three students.

**Exhibit 29. Groups represented on Title VI Parent Advisory Committees, 2017–18**



**Exhibit reads:** In 2017–18, 98 percent of district grantees reported that the parents/guardians of American Indian and Alaska Native students eligible for grant-funded services were represented on their Title VI Parent Advisory Committee.

Source: Survey of Title VI Grant Coordinators, Item 20 ( $n = 1,028$ ; see Exhibit A-49 in the Technical Appendix).

Overall, 30 percent of grantees reported that their Parent Advisory Committees met annually, 19 percent met once per semester, 21 percent met quarterly, and 21 percent met monthly (see Exhibit A-51 in the Technical Appendix). Case study sites provided examples of grantees that convened and collected input from Parent Advisory Committees and of those that did not. For instance, one district grantee’s Parent Advisory Committee held regular formal public hearings that community members attended to provide suggestions and raise concerns. Other grantees did not have functioning committees. One Title VI grant coordinator explained that they struggled to engage parents:

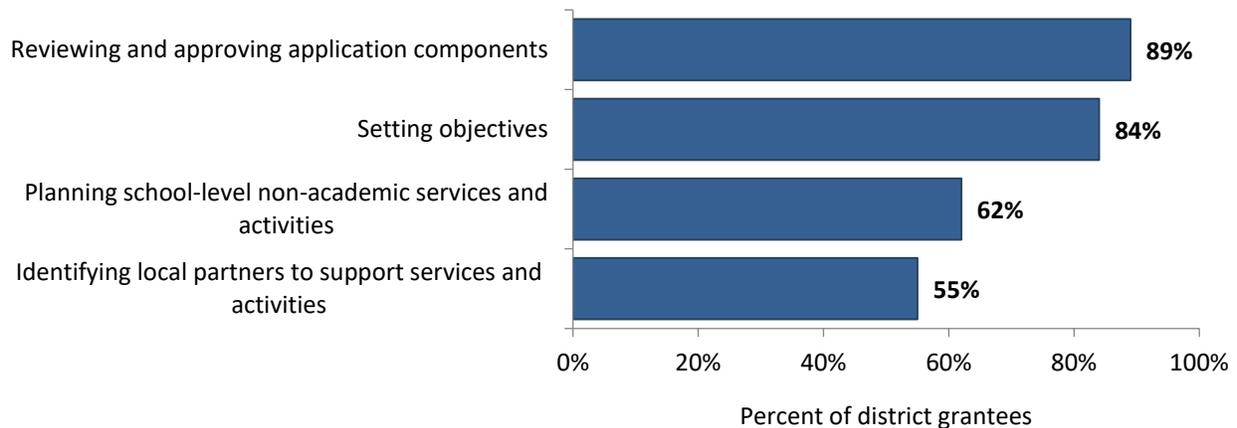
*We have trouble getting parents...coming to anything. [Grantee staff member] performs a Herculean task in contacting parents. There’s just not a lot of follow-up. Over the years, we’ve had a few individual parents that have been involved and very helpful, but as a committee itself, nope. We had a parent meeting a week or two ago, and no one showed up.*

Another grantee experienced similar struggles with parent attendance, and staff members noted that parents face many obstacles to participation, including long distances between home and school and a lack of transportation. Staff from this site noted that parent participation increased when they provided meals or other incentives (e.g., raffles for bookstore gift cards).

**Most Parent Advisory Committees reviewed and approved grant applications and set project objectives.**

In 2017–18, most Title VI Parent Advisory Committees reviewed and approved grant applications (89 percent) and set grant objectives (84 percent); a majority also helped to plan school activities (62 percent) and identify partners (55 percent) (Exhibit 30). One case study grantee held an annual parent committee meeting to review the grant application. The grant coordinator used an electronic whiteboard to examine the application as a group and described the parents as the “driving force” behind the application.

**Exhibit 30. Title VI Parent Advisory Committee support for planning, 2017–18**



**Exhibit reads:** In 2017–18, 85 percent of grantees reported that their Title VI Parent Advisory Committee reviewed and approved components of the Title VI grant application.

Source: Survey of Title VI Grant Coordinators, Item 22 ( $n = 1,146$ ; see Exhibit A-53 in the Technical Appendix).

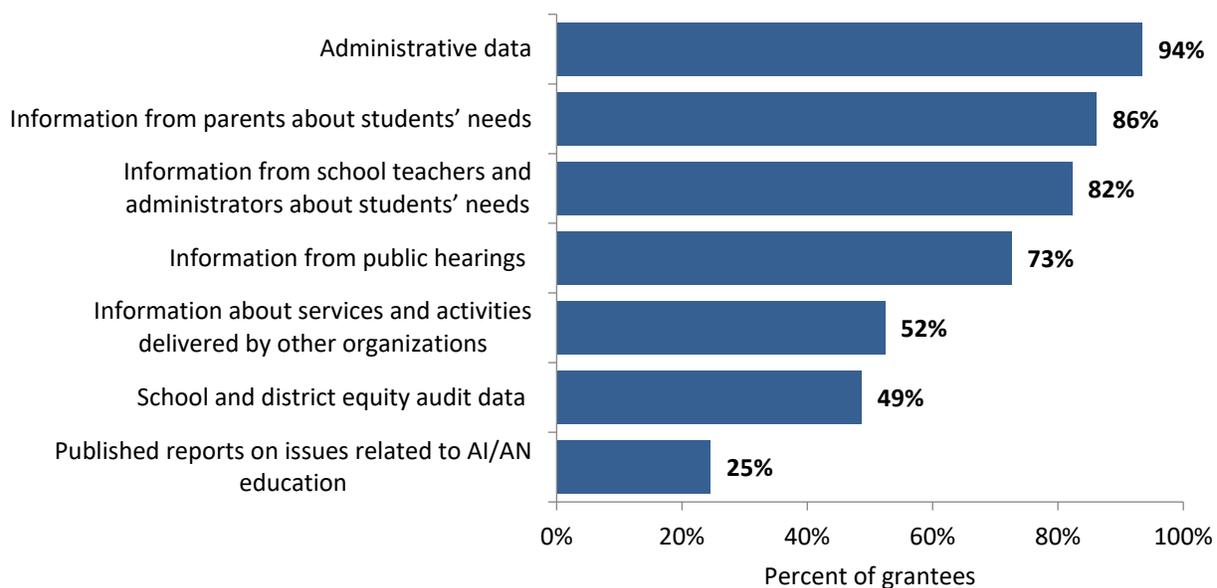
**Using Data and Stakeholder Input**

Title VI grantees are required to plan services and activities based on information gathered through the needs assessment and in open consultation with stakeholders through public hearings.

**Most grantees reported using multiple data sources for project planning, including administrative data and information from parents, teachers, and administrators and from public hearings.**

In planning grant-funded services, most grantees used the information gathered through their needs assessments, including administrative data such as course grades, test scores, and attendance data (94 percent) and ideas and recommendations from parents (86 percent), from teachers and administrators (82 percent), and from public hearings (73 percent) (Exhibit 31).

**Exhibit 31. Data sources Title VI grantees used to plan services, 2017–18**



**Exhibit reads:** In 2017–18, 94 percent of grantees used school district-collected administrative data (e.g., course grades, test scores, attendance rate, behavior data, graduation and/or dropout data, and college acceptance data) to plan grant-funded services and activities.

Source: Survey of Title VI Grant Coordinators, Item 12 ( $n = 1,155$ ; see Exhibit A-55 in the Technical Appendix).

Case study sites included grantees that relied on multiple sources of data and grantees that depended more narrowly on one or two data sources. For instance, the coordinator of a large Title VI-funded project explained that they drew on multiple sources—advisory group, focus groups, parents, teachers, extant data—to inform planning. The services this site offered were designed to address the diverse academic and cultural needs surfaced through this information gathering. The superintendent at another site described relying on test scores to determine supports:

*Our area of greatest need is in the elementary and particularly with the literacy.... So, we've really focused and targeted those literacy skills. This was guided by reviewing the data...all the data we have that comes from our state-mandated testing.*

Another superintendent described efforts to gather input from parents and the influence of parent perspectives on the planning process:

*The parents are the ones who know what their kids need. When I first came into the district, I did a summer trip and visited each site and met with the folks at each village.... Those people there, they knew exactly what they wanted for their kids, so my role is to facilitate that.*

A teacher spoke of the importance of being responsive to multiple stakeholder groups and trying to find some balance between academics and culture:

*The cultural aspect is what's important to the tribe. If you talk to teachers, they are going to tell you the academic part is...what's important to the school. If you talk to district personnel, they are going to tell you reading and math—academics—is going to be the most important. You've got to find the balance and finding that balance. Being the person who is teaching it, can sometimes be a little overwhelming.*

Grantees varied by both award size and grantee type in the data sources they used to plan Title VI-funded services. School districts were more likely than BIE schools and tribes to gather information from public hearings (76 percent vs. 47 percent) and from other organizations that serve American Indian and Alaska Native students (54 percent vs. 38 percent) (see Exhibit A-56 in the Technical Appendix). And grantees with larger awards were somewhat more likely than grantees with smaller awards to use data collected from other organizations that serve American Indian and Alaska Native students (59 percent vs. 45 percent), from public hearings (77 percent vs. 68 percent), and from parents (89 percent vs. 83 percent) (Exhibit 32).

**Exhibit 32. Data sources Title VI grantees used to plan services, by grant award size, 2017–18**

	Larger awards (above median)	Smaller awards (below median)	Percentage point difference
Information about services and activities delivered by other organizations that serve American Indian and Alaska Native students	59%	45%	14
Public hearings	77	68	9
Information from parents about students' culturally relevant academic needs	89	83	6

**Exhibit reads:** In 2017–18, 59 percent of grantees with larger awards and 45 percent of grantees with smaller awards used information about services and activities delivered by other organizations that serve American Indian and Alaska Native students to plan services, a 14 percentage point difference.

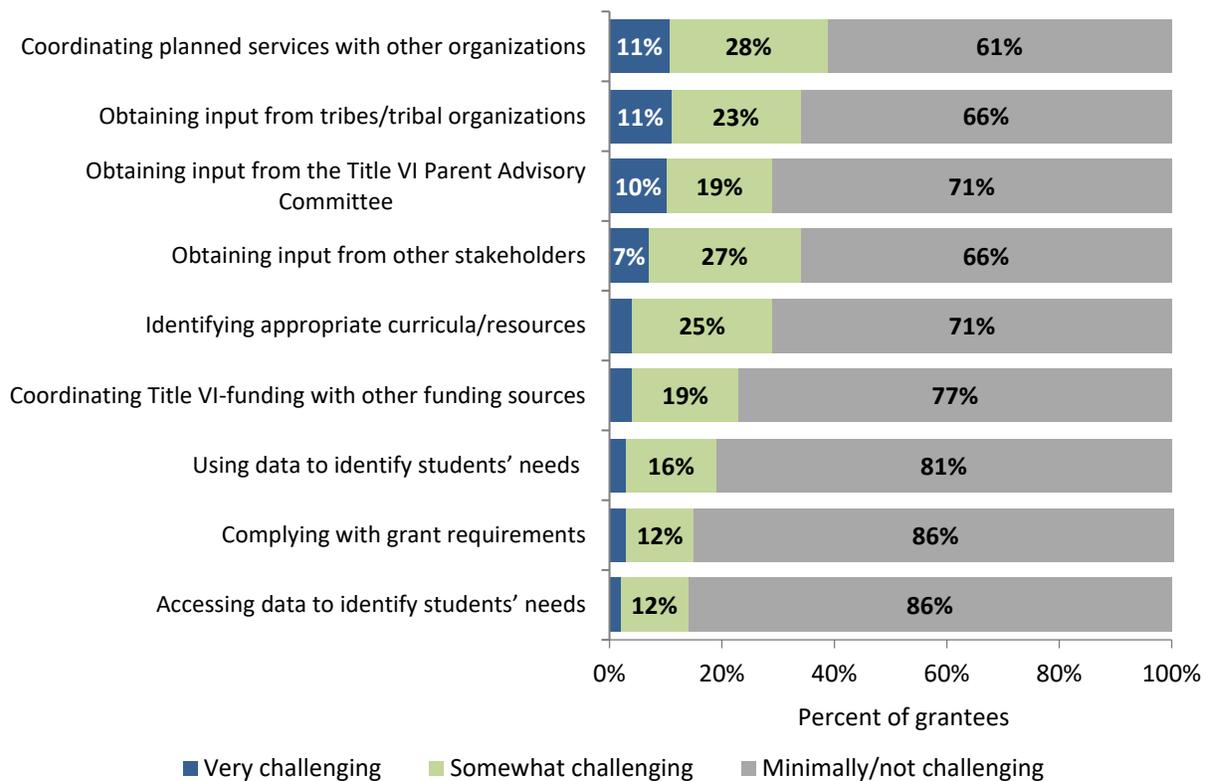
Note: All differences between groups are statistically significant at  $p < .05$ .

Source: Survey of Title VI Grant Coordinators, Item 12 (grantees with larger awards  $n = 596$ ; grantees with smaller awards  $n = 559$ ; see Exhibit A-57 in the Technical Appendix).

**About a fourth to a third of grantees found it somewhat or very challenging to coordinate planned services with other organizations and obtain input from stakeholders in the planning process.**

Grantees had different experiences planning Title VI-funded services. Approximately a third of grantees reported that some efforts, such as coordinating planned services with other organizations (e.g., coordinating mental health services with local health organization) and obtaining input from tribes, the Parent Advisory Committee, and other stakeholders, were either somewhat or very challenging, while the remaining two thirds found the same efforts minimally challenging or not challenging (Exhibit 33). Nearly a third (29 percent) reported that identifying appropriate curriculum or resources was either somewhat or very challenging. Fewer grantees (15 percent) reported that complying with grant requirements was either somewhat or very challenging.

**Exhibit 33. Grantees reporting challenges to efforts to plan Title VI-funded services and activities, 2017–18**



**Exhibit reads:** In 2017–18, 11 percent of grantees reported that it was very challenging to coordinate planned services with other organizations.

Note: Analyses excluded respondents selecting “Not applicable” or “Don’t know.” Numbers may not add to 100% due to rounding.  
 Source: Survey of Title VI Grant Coordinators, Item 13 (n = 1,116; see Exhibit A-58 in the Technical Appendix).

## Chapter Summary

Title VI grantees reported relying on a common set of strategies to identify program-eligible students. They asked families directly about their affiliation with American Indian and Alaska Native tribes, and they included ED 506 forms in school enrollment packets. Most grantees also relied on student information systems to locate students who had self-identified as American Indian and Alaska Native in response to questions about race and ethnicity. Just over half of grantees conducted targeted outreach to notify American Indian and Alaska Native families about available Title VI-funded services for eligible children. To verify the accuracy of student counts, most grantees conducted an annual review of information collected on the ED 506 forms.

To assess student needs, most Title VI grantees reported collected information from stakeholder groups. The grantees tended to rely on face-to-face communication such as public hearings and convenings, although many also used surveys. Ultimately, multiple data sources informed Title VI project planning. Most grantees reported relying on administrative data such as course grades, test scores, and attendance data; information gathered from parents, teachers, and administrators; and information gathered via public hearings.

## Chapter 4. Measuring Progress Toward Title VI Project Objectives

Each Title VI grantee includes in its application specific goals or “objectives” and a description of how the project will offer services and activities to meet those objectives. The grantees are required to assess progress toward their project objectives and then report the results to their Parent Advisory Committee, the broader community that a local school district serves, and the tribes whose children are served by the school district (*ESEA* § 6114(b)(6)). Additionally, grantees submit an Annual Performance Report (APR) to the Office of Indian Education to report on their progress towards these objectives.

This chapter describes the types of objectives that grantees established for their projects and the data sources they used to assess progress toward achieving those objectives. Example of project objectives include increasing American Indian and Alaska Native students' academic achievement, knowledge of cultural identity and awareness, and school attendance.

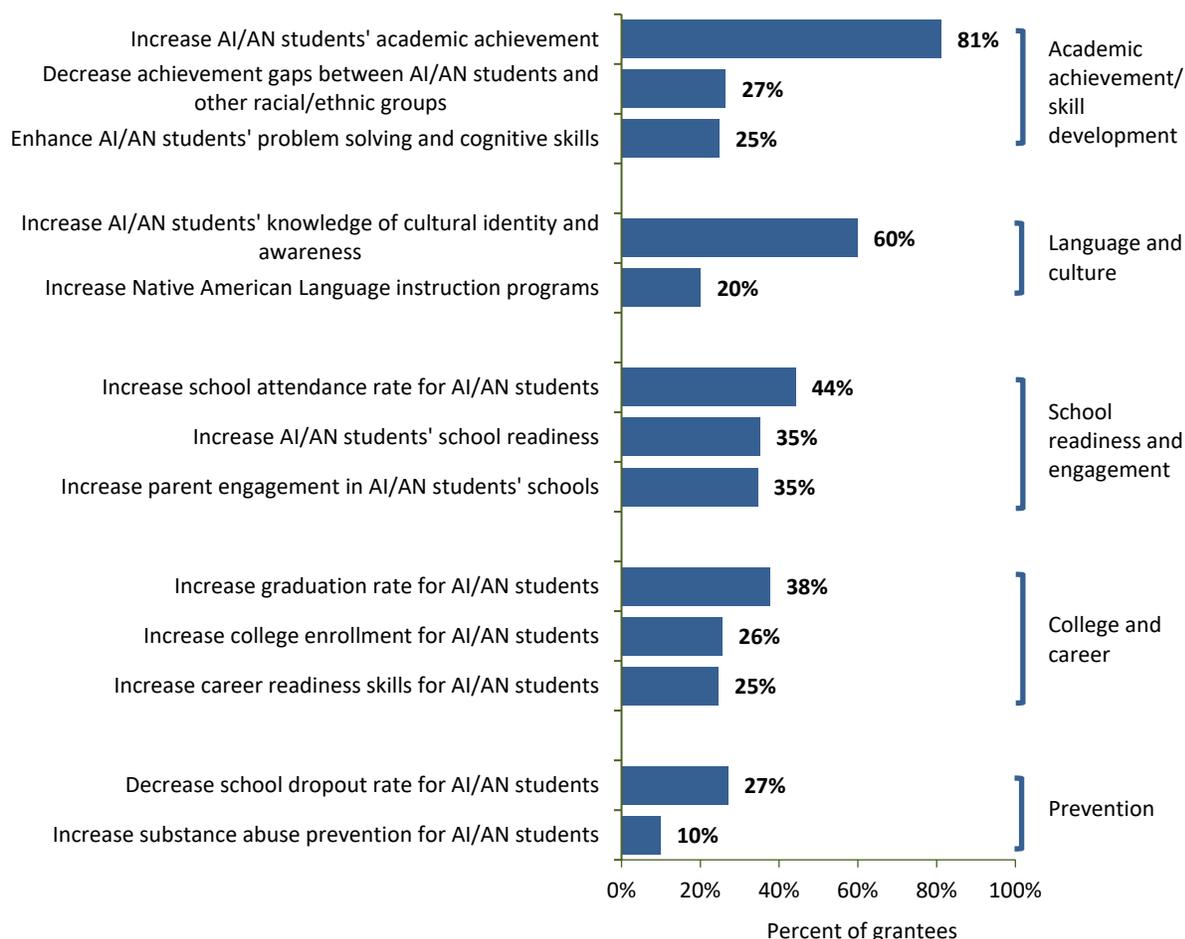
### Project Objectives

All Title VI grantees are required to conduct a community needs assessment to help them identify project objectives that support their school programs.

**The most common objectives of Title VI-funded projects were to increase Native American and Alaska Native students' academic achievement (81 percent), knowledge of cultural identity and awareness (60 percent), and school attendance (44 percent).**

Slightly more than one third of grantees reported that their project's objectives included increasing graduation rates (38 percent) and supporting parent engagement in schools (35 percent). Less commonly reported objectives were related to college enrollment and career readiness, increasing native language instruction programs, and increasing substance abuse prevention for American Indian and Alaska Native students (Exhibit 34).

**Exhibit 34. Objectives of Title VI-funded projects, 2017–18**



**Exhibit reads:** In their 2017–18 grant application, 81 percent of grantees included increasing American Indian and Alaska Native students’ academic achievement among their project objectives.

Source: Survey of Title VI Grant Coordinators, Item 10 (n = 1,161; see Exhibit A-62 in the Technical Appendix).

**School district grantees were more likely than BIE schools and tribes to include increasing graduation rates, college enrollment, and academic achievement among their project objectives. BIE schools and tribes were more likely to include increasing Native American language instruction programs and increasing knowledge of cultural identity and awareness as project objectives.**

District grantees were substantially more likely than BIE and tribal grantees to report that their project objectives included increasing graduation rates (40 percent vs. 24 percent) and decreasing school dropout rates (29 percent vs. 16 percent). In addition, a small but statistically significantly higher proportion of district grantees reported that their project objectives included increasing college enrollment, decreasing achievement gaps between American Indian and Alaska Native students and students from other racial and ethnic groups, and increasing academic achievement (Exhibit 35). In contrast, BIE schools and tribes were more likely than districts to report that their project objectives included increasing Native American language instruction programs (42 percent vs. 18 percent) and students’ cultural identity and awareness (73 percent vs. 59 percent).

**Exhibit 35. Objectives of Title VI-funded projects for American Indian and Alaska Native students, by grantee type, 2017–18**

	School districts	BIE schools and tribes	Percentage point difference
<b>More commonly used by BIE schools and tribal grantees</b>			
Increase Native American language instruction programs	18%	42%	24
Increase AI/AN students' knowledge and awareness of cultural identity	59	73	14
<b>More commonly used by district grantees</b>			
Increase graduation rate	40	24	16
Decrease school dropout rate	29	16	13
Increase college enrollment	27	14	13
Decrease achievement gaps between AI/AN students and other racial/ethnic groups	28	15	13
Increase academic achievement	83	71	12

**Exhibit reads:** In 2017–18, 18 percent of district grantees and 42 percent of BIE and tribal grantees included increasing Native American language instruction programs among their project objectives, a 24 percentage point difference.

Note: All differences between groups are statistically significant at  $p < .05$ .

Source: Survey of Title VI Grant Coordinators, Item 10 (school districts  $n = 1,036$ ; BIE schools and tribes  $n = 125$ ; see Exhibit A-62 in the Technical Appendix).

**Grantees with larger Title VI grant awards were more likely than those with smaller awards to include as project objectives increasing graduation rates, decreasing dropout rates, and increasing native language instruction programs.**

A smaller but statistically significant percentage of Title VI grantees' project objectives included increasing students' knowledge and awareness of their cultural identity and increasing college enrollment (Exhibit 36).

**Exhibit 36. Objectives of Title VI-funded projects, by grant award size, 2017–18**

	Larger awards (above median)	Smaller awards (below median)	Percentage point difference
Increase graduation rate	46%	30%	16
Decrease school dropout rate	33	21	12
Increase Native American language instruction programs	24	16	8

**Exhibit reads:** In 2017–18, 46 percent of grantees with larger awards and 30 percent of grantees with smaller awards included increasing the graduation rate of American Indian and Alaska Native students among their project objectives, a 16 percentage point difference.

Note: All differences between groups are statistically significant at  $p < .05$ .

Source: Survey of Title VI Grant Coordinators, Item 10 (grantees with larger awards  $n = 600$ ; grantees with smaller awards  $n = 561$ ; see Exhibit A-63 in the Technical Appendix).

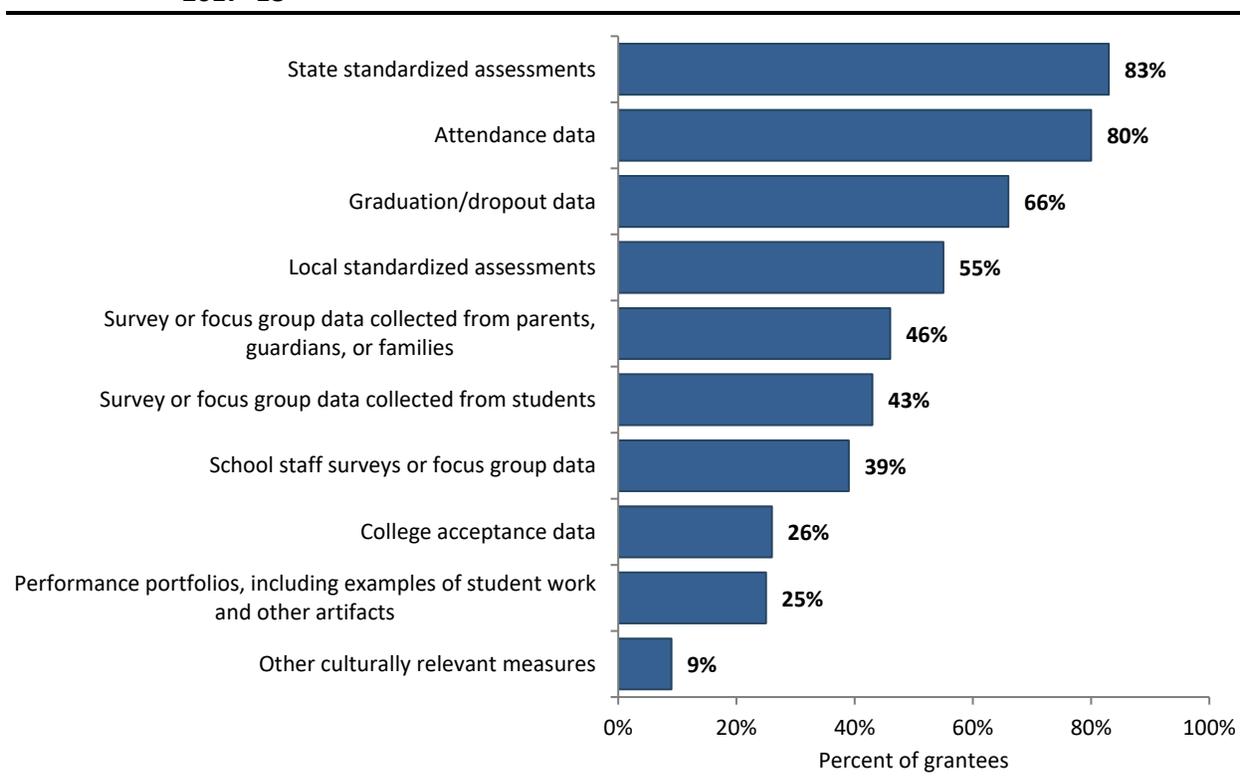
## Measuring Progress

In addition to identifying objectives, all grant applicants are required in their applications to identify the data sources they will use to measure progress toward meeting their project objectives.

**Most grantees used state standardized assessment scores (83 percent), attendance data (80 percent), and graduation/dropout data (66 percent) to measure progress toward Title VI project objectives.**

Less commonly used data sources for measuring progress toward Title VI project objectives included survey or focus group data collected from parents, guardians, or families (46 percent), from students themselves (43 percent), or from school staff (39 percent) (Exhibit 37).

**Exhibit 37. Data sources grantees used to measure progress toward Title VI project objectives, 2017–18**



**Exhibit reads:** In 2017–18, 83 percent of grantees used state standardized assessments to measure progress toward project objectives.

Source: Survey of Title VI Grant Coordinators, Item 26 ( $n = 1,146$ ; see Exhibit A-64 in the Technical Appendix).

**School districts were more likely than BIE schools and tribes to use assessment scores, graduation rates, and college acceptance data to measure progress; BIE and tribal grantees were more likely to use other culturally relevant measures.**

District grantees were more likely than BIE schools and tribal grantees to use graduation and dropout rates (69 percent vs. 41 percent), state standardized assessments (85 percent vs. 67 percent), and college acceptance data (27 percent vs. 15 percent) to measure progress toward their Title VI project

objectives. In contrast, BIE and tribal grantees were more likely than district grantees to use other culturally relevant measures to measure progress toward their project objectives, such as native language assessment data or data on mastery of cultural skills or completion of cultural projects (Exhibit 38).

**Exhibit 38. Data sources used to measure progress toward Title VI project objectives, by grantee type, 2017–18**

	School districts	BIE schools and tribes	Percentage point difference
<b>More commonly used by district grantees</b>			
Graduation/dropout data	69%	41%	28
State standardized assessments	85	67	18
College acceptance data	27	15	12
<b>More commonly used by BIE schools and tribal grantees</b>			
Other culturally relevant measures	8	21	13

**Exhibit reads:** In 2017–18, 69 percent of district grantees and 41 percent of BIE and tribal grantees used graduation/dropout data to measure progress toward project objectives, a 28 percentage point difference.

Note: All differences between groups are statistically significant at  $p < .05$ .

Source: Survey of Title VI Grant Coordinators, Item 26 (school districts  $n = 1,028$ ; BIE schools and tribes  $n = 118$ ; see Exhibit A-65 in the Technical Appendix).

**Grantees with larger Title VI awards were more likely than grantees with smaller awards to use each of five sources of data to measure their progress toward project objectives.**

Grantees with larger awards were more likely than those with smaller awards to measure progress toward their Title VI project objectives using graduation and dropout data; family, student, and staff surveys or focus groups; and other culturally relevant measures (Exhibit 39).

**Exhibit 39. Data sources used to measure progress toward Title VI project objectives, by grant award size, 2017–18**

	Larger awards (above median)	Smaller awards (below median)	Percentage point difference
Graduation/dropout data	74%	58%	16
Family surveys or focus groups	53	38	15
Student surveys or focus groups	49	36	13
Staff surveys or focus groups	44	34	10
Other culturally relevant measures	13	5	8

**Exhibit reads:** In 2017–18, 74 percent of Title VI grantees with larger awards and 58 percent with smaller awards used graduation/dropout data to measure progress toward project objectives, a 16 percentage point difference.

Note: All differences between groups are statistically significant at  $p < .05$ .

Source: Survey of Title VI Grant Coordinators, Item 26 (grantees with larger awards  $n = 592$ ; grantees with smaller awards  $n = 554$ ; see Exhibit A-66 in the Technical Appendix).

In interviews, Title VI grant coordinators and other staff members described the types of data they used to measure progress on their project objectives. For example, one grant coordinator explained that measuring progress requires relying on more than the standard measures of Title VI project progress (i.e., as reported in ED Facts) and considering state data with student experiences to paint an appropriately nuanced picture of their work:

*Because now we're recognizing the unique aspects [of the work] we're doing, but then how do we assess [the students] locally and validate that learning and the impact that we're having, that is not going to be seen on what is populated by ED Facts. And so, a lot of it has been through just personal narratives, stories, surveys that we do with the kids. And then at times we will have the parent focus groups, too.... But...it's been more informal and how we move forward to just kind of gauge what's effective, what should we do again this year or not, and it's just us coming together as a team, evaluating.*

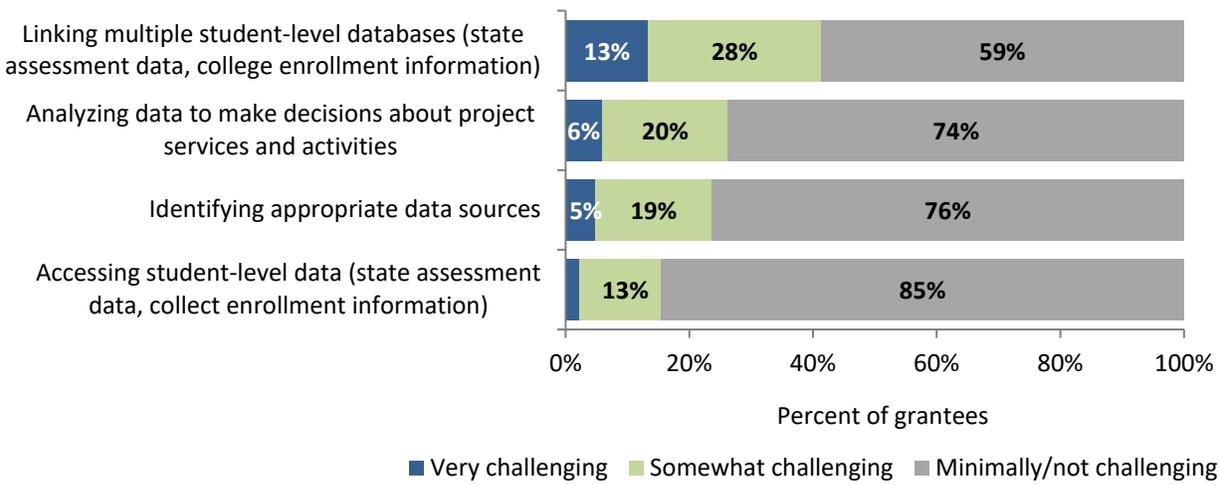
Additional interviewees described using other measures to gauge progress on their project objectives. One Title VI grant coordinator described looking at student engagement as a progress indicator: "One of the things that I do notice [is] that a lot of our native kids, they love the afterschool program. We have really good attendance in that." A counselor in another case study site described tracking American Indian and Alaska Native students' test scores and participation data:

*I'm the test coordinator, so we give the [District Assessment], and I personally have tracked...those [Title VI grant] students that [the Title VI grant intervention teacher] works with, and I have seen from the beginning of the year the growth that they were able to make with [the Title VI grant intervention teacher] being on the campus and being able to work hand in hand with that teacher, not just the students, but [the Title VI grant intervention teacher] goes into the teacher's classroom and sees what they need and then brings them in.*

**Most grantees did not report significant challenges collecting or using data to measure progress toward Title VI project objectives.**

Most grantees reported that collecting and using most types of data to measure progress toward project objectives was either minimally challenging or not challenging (Exhibit 40). Still, 20 percent of grantees reported that collecting data from parents of American Indian and Alaska Native students was very challenging, and another 35 percent found it somewhat challenging. The next most common challenges were related to collecting data from tribes or tribal organizations (47 percent reported that this was somewhat or very challenging) and linking multiple student-level databases (e.g., state assessment data or college enrollment information) (41 percent). The least challenging data collection or data use strategy was accessing student-level data for eligible students (15 percent).

**Exhibit 40. Title VI grantees reporting challenges to implementing data collection or data use strategies in 2017–18**



**Exhibit reads:** In 2017–18, 20 percent of Title VI grantees reported that collecting data from parents of Title VI-eligible students was very challenging, 35 percent reported it was somewhat challenging, and 45 percent reported it was minimally challenging or not challenging.

† Only school districts responded to this item.

Note: Analyses excluded respondents selecting “Not applicable” or “Don’t know.” Numbers may not add to 100% due to rounding.

Source: Survey of Title VI Grant Coordinators, Item 27 (n = 1,080; see Exhibit A-67 in the Technical Appendix).

Interviewees described some of the challenges associated with measuring progress toward nonacademic project objectives. For example, a teacher in a case study site noted that many of the Title VI grant students had experienced trauma and wondered how to measure progress on that:

*Trauma in kids’ lives, it’s so prevalent. Oftentimes, I don’t know how you measure [progress with] that...you know it takes years. I mean it takes a year for me to go through and specifically have certain kids in mind and say here’s my goal with this student, and it has nothing to do with academics. It has everything to do with bringing them to a place where they trust or are closer to trusting others.*

A Title VI-funded teacher described the challenges associated with measuring the cultural learning objectives of the program: “I think probably there is really no real way to measure the cultural aspect of it, except that kids come to school more often.”

## Chapter Summary

All grantees are required to define their project objectives and assess progress toward achieving them. Among the most common objectives Title VI grantees reported were increasing Native American and Alaska Native students’ academic achievement, knowledge of cultural identity and awareness, and school attendance. The data sources that most Title VI grantees reported using to measure progress toward meeting their project objectives included state standardized test scores, attendance data, and graduation/dropout data.

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