



MEMORANDUM

March 21, 2014

To: Honorable Judy Chu
Attention: Krystal Kaai

From: Alexandra Hegji
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Subject: Asian American and Native American Pacific Islander-Serving Institutions

This memorandum is in response to your request for a list of the institutions of higher education (IHEs) that are potentially eligible to receive grants under the Strengthening Asian American and Native American Pacific Islander-Serving Institutions (AANAPISIs) programs, authorized by sections 320 and 371 of the Higher Education Act of 1965, as amended (HEA; P.L. 89-329).

The first section of the memorandum describes the eligibility criteria IHEs must meet to be receive Strengthening AANAPISI program grants. The next section then describes the methodology CRS used to identify potentially eligible IHEs and presents a table of those potentially eligible IHEs.

Information in this memorandum may be of general interest to Congress. As such, this information may be provided by CRS to other congressional requesters, and may be published in CRS products for general distribution to Congress at a later date. Your confidentiality as a requester would be preserved in any case.

Eligibility

Under Title III, sections 320 and 371 of the HEA, an IHE is eligible to receive a Strengthening AANAPISI grant if it meets the basic eligibility criteria for HEA Titles III and V programs, found in HEA section 312(b) and has, at the time of application, an enrollment of undergraduate students that is at least 10% Asian American and Native American Pacific Islander (AANAPI). Asian Americans are defined as “person[s] having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.”¹ Native American Pacific Islander is defined as “any

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

descendant of the aboriginal people of any island in the Pacific Ocean that is a territory or possession of the United States.”² To meet the section 312(b) basic eligibility requirements, an institution must:

- be an institution of higher education (IHE), as defined in section 101 of the HEA;
- have lower than average educational and general (E&G) expenditures per full-time equivalent (FTE) undergraduate student compared to institutions that offer similar instruction;³
- have a requisite enrollment of needy students;
- be legally authorized within its respective state to award bachelor’s degrees; be a community college; or be the College of the Marshall Islands, the College of Micronesia/Federated States of Micronesia, or Palau Community College;
- be accredited or making progress toward accreditation by a nationally recognized accrediting agency or association recognized by the Secretary of Education (the Secretary); and
- be located in one of the 50 states, the Commonwealth of Puerto Rico, the District of Columbia, Guam, American Samoa, the United States Virgin Islands, the Commonwealth of the Northern Mariana Islands, or the freely associated states.

Branch campuses of institutions that meet the section 312(b) eligibility criteria are also eligible if they have lower than average E&G expenditures per FTE undergraduate student and have a requisite enrollment of needy students. An institution is considered to have met the enrollment of needy students criterion if (1) at least 50% of its degree-seeking students receive financial assistance under one or more of the following programs: Federal Pell Grant, Federal Supplemental Educational Opportunity Grant, Federal Work-Study, or the Federal Perkins Loan or (2) the percentage of its undergraduate degree-seeking students who were enrolled at least half-time and received a Federal Pell Grant met or exceeded the median percentage at comparable institutions.⁴

² HEA sections 320(b)(3) and 371(c)(7).

³ The Secretary of Education may waive the requirement of lower than average E&G expenditures per FTE undergraduate student if the institution submits persuasive evidence that the data are distorted by certain factors and designation of the institution as an eligible program is otherwise consistent with the program’s purposes.

⁴ The Secretary of Education may waive the enrollment of needy students requirement if the institution demonstrates one of the following: (1) the state provides more than 30% of the institution’s budget and the institution charges not more than \$99 for tuition and fees for an academic year; (2) at least 30% of the students served by the institution were students from low-income families; (3) the institution substantially increases the higher education opportunities for low-income students who are also educationally disadvantaged, underrepresented in postsecondary education, or minority students; (4) the institution substantially increases the higher education opportunities for individuals who reside in an area that is not included in a “metropolitan statistical area” as defined by the Office of Management and Budget and who are unserved by other postsecondary institutions; (5) the institution is located on or within 50 miles of an Indian reservation or a substantial population of Indians, and the institution will, if granted the waiver, substantially increase higher education opportunities for American Indians; (6) the institution is a tribal college or university; or (7) the institution will, if granted the waiver, substantially increase the higher education opportunities for Black Americans, Hispanic Americans, Native Americans, Asian Americans or Pacific Islanders, including Native Hawaiians.

Potentially Eligible Institutions

For institutions to participate in the HEA Titles III and V programs, there is a two-step application process. In step one, an institution applies to the Department of Education (ED) to be designated as eligible under the HEA section 312(b) basic eligibility criteria. If approved by ED, the institution must then apply for a specific Title III or V program grant and demonstrate that it meets the relevant minority student enrollment criteria (e.g., Strengthening AANAPISIs, Strengthening Hispanic Serving Institutions).

To estimate the institutions that are potentially eligible for Strengthening AANAPISI grants, CRS compiled a single list from ED's lists of institutions that met the aforementioned Titles III and V section 312(b) basic eligibility criteria for at least one year from FY2007 through FY2013.⁵ CRS used these ED lists, because certain data elements relevant to the eligibility criteria are not available to CRS in existing national datasets, and for this exercise, CRS assumes that an institution eligible in FY2007 through FY2013 may still meet the basic 312(b) eligibility criteria today.⁶ The ED Titles III and V eligibility lists contained a combined total of 1,607 institutions and branch campuses designated as eligible under section 312(b).⁷

CRS then used ED Integrated Postsecondary Education Data System (IPEDS) data to identify the institutions designated as eligible under section 312(b) that also have at least a 10% Asian/Native Hawaiian/Other Pacific Islander⁸ (ANHPI) unduplicated undergraduate enrollment for the 12-month 2011-12 academic year (AY). We have also used IPEDS data to identify the institutions eligible under section 312(b) that have at least a 10% ANHPI fall 2011 enrollment.⁹ Institutions that have closed, are currently operated as for-profits, or could not be matched between IPEDS and the section 312(b) list were eliminated. Of the 1,607 institutions and branch campuses designated as eligible under section 312(b), we identified 151 institutions that had at least 10% ANHPI enrollment in either fall 2011 or AY2011-12 and

⁵ The ED lists were available at U.S. Department of Education, "Title III Part A Programs - Strengthening Institutions, Eligible Institutions," downloaded from <http://www2.ed.gov/programs/duesititle3a/eligibility.html> on March 5, 2014.

⁶ Although an institution may meet the section 312(b) basic eligibility criteria, other factors may limit its ability to receive a Title III/V grant. For instance, an institution that receives an individual development grant of five years under the Strengthening Institutions program (sections 311-315 of the HEA) may not subsequently receive another Title III/V individual development grant for a period of two years from the date on which the five-year grant period terminates. Therefore, some institutions may not find it necessary to reapply for basic eligibility for seven years, after the five-year award and two-year wait-out period.

⁷ Although institutions receiving an individual grant under the Strengthening Institutions program may not subsequently receive another grant for a period of two years from the date on which the five-year grant period terminates, they may still meet the section 312(b) eligibility criteria and are still included in ED's list of eligible institutions. Thus, current and former Title III and Title V program grantees appear on the ED list and the list constructed by CRS of institutions potentially eligible for the Strengthening AANAPISI grant program.

⁸ IPEDS defines Asian/Native Hawaiian/Other Pacific Islander as a person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian Subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam or a person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

⁹ The unduplicated undergraduate enrollment for the 12-month AY2011-2012 is the most recently available data on IPEDS. Therefore, for consistency, the fall 2011 undergraduate enrollment data was used, even though fall 2012 undergraduate enrollment data is currently available on IPEDS.

are thus, potentially eligible to receive Strengthening AANAPISI program grants.¹⁰ These 151 institutions are presented below in **Table 1**.

It is important to note that the list of potentially eligible AANAPISIs in **Table 1** is not a definitive list for three major reasons. First, only institutions and branch campuses that have previously applied for basic eligibility for the Title III and Title V programs are included. Some institutions or branch campuses that have not applied for eligibility under the Title III and Title V programs may meet the basic eligibility criteria now or in the future; while some previously eligible institutions may no longer meet the criteria. Second, IPEDS demographics data may represent a single branch campus or the aggregate demographics of the main and branch campuses of an institution. For this reason, additional branch campuses may be eligible, and some branch campuses may not be eligible. Finally, because institutional enrollment numbers change annually and institutions must certify at the time of submitting an application that they meet the minimum enrollment requirements, this list only represents those institutions that met the enrollment requirement for either fall 2011 or AY2011-12.

Analysis of **Table 1** reveals some characteristics of potentially eligible AANAPISIs. Almost half (49%) of the potentially eligible AANAPISIs are in the state of California, while the next largest proportion (11%) is in New York. Approximately half (52%) of the potentially eligible AANAPISIs are public two-year institutions. The remaining institutions are primarily divided between public four-year institutions (28%) and private not-for-profit four-year institutions (18%). The majority (89%) of potentially eligible AANAPISIs have no more than 40% ANHPI enrollment, and over half (62%) have no more than 20% ANHPI enrollment.

Table 1. Postsecondary Institutions Eligible under HEA Section 312(b) with a Minimum 10 Percent Asian/Native Hawaiian/Other Pacific Islander (ANHPI) Undergraduate Enrollment

State	Institution ^a	Sector	% ANHPI AY2011-12	% ANHPI Fall 2011
AS	American Samoa Community College	Public, 4-year	91.9%	92.7%
CA	American River College	Public, 2-year	10.1%	9.9%
CA	Berkeley City College	Public, 2-year	17.3%	15.7%
CA	California State Polytechnic University-Pomona	Public, 4-year	25.4%	25.6%
CA	California State University-East Bay	Public, 4-year	26.2%	26.5%
CA	California State University-Fresno	Public, 4-year	15.2%	15.3%
CA	California State University-Fullerton	Public, 4-year	21.9%	22.1%
CA	California State University - Long Beach	Public, 4-year	23.1%	23.3%

¹⁰ Keweenaw Bay Ojibwa Community College in Baraga, Michigan was eliminated manually because its reported ANHPI enrollment was assumed to be a data error. Additionally, State Center Community College District in Fresno California was also eliminated manually, as it is an administrative unit aggregating and reporting enrollment data for several individual institutions whose enrollment data cannot be disaggregated.

State	Institution^a	Sector	% ANHPI AY2011-12	% ANHPI Fall 2011
CA	California State University-Los Angeles	Public, 4-year	17.5%	17.5%
CA	California State University-Northridge	Public, 4-year	11.4%	11.5%
CA	California State University - Sacramento	Public, 4-year	20.4%	20.6%
CA	California State University - San Marcos	Public, 4-year	10.0%	10.0%
CA	California State University-Stanislaus	Public, 4-year	11.2%	11.1%
CA	California College of the Arts	Private not-for-profit, 4-year	15.7%	16.0%
CA	Cañada College	Public, 2-year	13.6%	12.2%
CA	Cerritos College	Public, 2-year	10.6%	10.4%
CA	Chabot College	Public, 2-year	25.7%	26.1%
CA	City College of San Francisco	Public, 2-year	33.6%	34.6%
CA	Coastline Community College	Public, 2-year	26.6%	28.2%
CA	Coleman University	Private not-for-profit, 4-year	14.0%	15.4%
CA	College of Alameda	Public, 2-year	29.7%	29.6%
CA	Contra Costa College	Public, 2-year	19.8%	19.4%
CA	Cosumnes River College	Public, 2-year	25.3%	26.1%
CA	Cypress College	Public, 2-year	22.6%	22.4%
CA	De Anza Community College	Public, 2-year	39.2%	37.7%
CA	East Los Angeles College	Public, 2-year	11.8%	11.4%
CA	El Camino Community College District	Public, 2-year	14.9%	14.8%
CA	Evergreen Valley College	Public, 2-year	34.8%	38.8%
CA	Fresno City College	Public, 2-year	15.9%	16.9%
CA	Fullerton College	Public, 2-year	14.2%	13.3%
CA	Glendale Community College	Public, 2-year	11.3%	10.1%
CA	Golden West College	Public, 2-year	29.1%	29.6%
CA	Holy Names University	Private not-for-profit, 4-year	16.9%	15.7%
CA	La Sierra University	Private not-for-profit, 4-year	19.4%	19.1%
CA	Laguna College of Art & Design	Private not-for-profit, 4-year	18.4%	18.9%
CA	Laney College	Public, 2-year	26.4%	26.6%
CA	Long Beach City College	Public, 2-year	14.5%	14.6%
CA	Los Angeles City College	Public, 2-year	14.1%	14.4%
CA	Los Angeles County College of Nursing and Allied Health	Public, 2-year	29.5%	28.3%
CA	Los Angeles Harbor College	Public, 2-year	13.1%	13.3%
CA	Los Angeles Pierce College	Public, 2-year	12.5%	12.8%
CA	Los Medanos College	Public, 2-year	11.0%	11.0%
CA	Merced College	Public, 2-year	10.6%	11.0%

State	Institution ^a	Sector	% ANHPI AY2011-12	% ANHPI Fall 2011
CA	Merritt College	Public, 2-year	17.9%	16.6%
CA	Mills College	Private not-for-profit, 4-year	11.0%	10.7%
CA	Mission College	Public, 2-year	45.7%	44.7%
CA	Monterey Peninsula College	Public, 2-year	10.4%	10.5%
CA	Mount Saint Mary's College	Private not-for-profit, 4-year	17.7%	18.6%
CA	Mount San Antonio College	Public, 2-year	19.6%	19.4%
CA	Napa Valley College	Public, 2-year	14.2%	15.2%
CA	National University	Private not-for-profit, 4-year	9.2%	12.0%
CA	Notre Dame de Namur University	Private not-for-profit, 4-year	13.6%	14.0%
CA	Orange Coast College	Public, 2-year	21.8%	22.5%
CA	Otis College of Art & Design	Private not-for-profit, 4-year	34.0%	35.0%
CA	Pacific Union College	Private not-for-profit, 4-year	18.5%	21.1%
CA	Pasadena City College	Public, 2-year	25.8%	26.0%
CA	Sacramento City College	Public, 2-year	20.6%	20.8%
CA	Saddleback College	Public, 2-year	10.8%	9.8%
CA	San Diego City College	Public, 2-year	10.7%	10.2%
CA	San Francisco State University	Public, 4-year	27.6%	28.0%
CA	San Joaquin Delta College	Public, 2-year	18.6%	19.0%
CA	San Jose City College	Public, 2-year	26.4%	25.2%
CA	San Jose State University	Public, 4-year	34.2%	34.6%
CA	Santa Monica College	Public, 2-year	12.3%	11.9%
CA	Solano Community College	Public, 2-year	14.2%	13.4%
CA	Southwestern College	Public, 2-year	14.0%	13.8%
CA	University of California - Irvine	Public, 4-year	49.2%	49.1%
CA	University of California - Merced	Public, 4-year	29.4%	29.4%
CA	University of California - Riverside	Public, 4-year	38.0%	37.7%
CA	University of California - Santa Cruz	Public, 4-year	20.6%	20.7%
CA	University of San Francisco	Private not-for-profit, 4-year	19.0%	19.5%
CA	University of the Pacific	Private not-for-profit, 4-year	34.0%	32.7%
CA	West Valley College	Public, 2-year	17.4%	16.1%
CA	Whittier College	Private not-for-profit, 4-year	9.9%	10.3%
CA	Yuba College	Public, 2-year	11.8%	12.0%
FM	College of Micronesia - FSM	Public, 2-year	99.7%	99.9%
GA	Georgia State University	Public, 4-year or above	10.2%	10.6%
GU	Guam Community College	Public, 2-year	93.5%	94.4%
GU	Pacific Islands University	Private not-for-profit, 4-year	85.9%	81.9%

State	Institution ^a	Sector	% ANHPI AY2011-12	% ANHPI Fall 2011
GU	University of Guam	Public, 4-year	91.0%	91.4%
HI	Chaminade University of Honolulu	Private not-for-profit, 4-year	32.6%	35.8%
HI	Hawaii Community College	Public, 2-year	31.5%	32.3%
HI	Honolulu Community College	Public, 2-year	51.5%	53.6%
HI	Kapiolani Community College	Public, 2-year	47.8%	49.7%
HI	Kauai Community College	Public, 2-year	38.0%	39.1%
HI	Leeward Community College	Public, 2-year	46.6%	47.1%
HI	University of Hawaii at Hilo	Public, 4-year	30.8%	31.9%
HI	University of Hawaii at Manoa	Public, 4-year	44.8%	45.1%
HI	University of Hawaii Maui College	Public, 4-year	40.6%	41.7%
HI	University of Hawaii - West Oahu	Public, 4-year	48.1%	48.8%
HI	Windward Community College	Public, 2-year	31.0%	30.9%
IL	City Colleges of Chicago - Harold Washington College	Public, 2-year	13.3%	12.1%
IL	City Colleges of Chicago – Harry S Truman College	Public, 2-year	13.2%	13.2%
IL	College of Du Page	Public, 2-year	10.0%	9.4%
IL	East West University	Private not-for-profit, 4-year	10.0%	8.0%
IL	Harper College	Public, 2-year	10.3%	11.0%
IL	Illinois Institute of Technology	Private not-for-profit, 4-year	11.5%	11.4%
IL	Oakton Community College	Public, 2-year	19.4%	19.2%
IL	University of Illinois at Chicago	Public, 4-year	21.3%	21.8%
MA	Middlesex Community College	Public, 2-year	9.9%	10.3%
MA	University of Massachusetts - Boston	Public, 4-year	9.6%	11.5%
MA	Urban College of Boston	Private not-for-profit, 2-year	12.9%	15.7%
MD	Montgomery College	Public, 2-year	12.4%	12.3%
MD	University of Maryland - College Park	Public, 4-year	14.9%	15.0%
MH	College of the Marshall Islands	Public, 2-year	99.8%	99.5%
MN	Century College	Public, 2-year	14.4%	15.1%
MN	North Hennepin Community College	Public, 2-year	10.5%	11.2%
MN	Saint Paul College	Public, 2-year	12.4%	12.3%
MP	Northern Marianas College	Public, 4-year	82.4%	81.3%
NE	Creighton University	Private not-for-profit, 4-year	10.3%	9.9%
NJ	Middlesex County College	Public, 2-year	15.3%	13.9%
NJ	New Jersey Institute of Technology	Public, 4-year	21.3%	22.0%
NJ	Rutgers University – New Brunswick	Public, 4-year	24.5%	24.9%
NJ	Saint Peter's University	Private not-for-profit, 4-year	8.6%	11.6%

State	Institution ^a	Sector	% ANHPI AY2011-12	% ANHPI Fall 2011
NV	Nevada State College	Public, 4-year	12.2%	12.0%
NV	University of Nevada - Las Vegas	Public, 4-year	17.4%	18.7%
NY	Bramson ORT College	Private not-for-profit, 2-year	17.2%	16.9%
NY	CUNY Bernard M Baruch	Public, 4-year	32.3%	33.7%
NY	CUNY Borough of Manhattan Community College	Public, 2-year	11.4%	11.2%
NY	CUNY Brooklyn College	Public, 4-year	15.5%	16.2%
NY	CUNY City College	Public, 4-year	19.3%	20.5%
NY	CUNY Hunter College	Public, 4-year	21.8%	22.9%
NY	CUNY Kingsborough Community College	Public, 2-year	13.6%	13.0%
NY	CUNY LaGuardia Community College	Public, 2-year	18.8%	18.5%
NY	CUNY New York City College of Technology	Public, 4-year	15.7%	16.4%
NY	CUNY Queens College	Public, 4-year	23.0%	23.6%
NY	CUNY Queensborough Community College	Public, 2-year	20.7%	20.8%
NY	CUNY York College	Public, 4-year	19.7%	19.3%
NY	Long Island University – Brooklyn Campus	Private not-for-profit, 4-year	14.4%	15.2%
NY	New York Institute of Technology	Private not-for-profit, 4-year	13.3%	13.7%
NY	Polytechnic Institute of New York University	Private not-for-profit, 4-year	32.5%	33.2%
NY	Pratt Institute - Main	Private not-for-profit, 4-year	13.7%	15.5%
NY	St John's University – New York	Private not-for-profit, 4-year	15.4%	16.0%
NY	Vaughn College of Aeronautics and Technology	Private not-for-profit, 4-year	11.8%	12.7%
OR	Pacific University	Private not-for-profit, 4-year	15.9%	16.4%
PW	Palau Community College	Public, 2-year	99.8%	99.6%
TX	Brookhaven College	Public, 2-year	11.6%	11.4%
TX	Houston Community College	Public, 2-year	10.7%	10.0%
TX	North Lake College	Public, 2-year	13.6%	12.7%
TX	Richland College	Public, 2-year	14.6%	14.9%
TX	University of Houston	Public, 4-year	20.6%	21.3%
TX	University of St Thomas	Private not-for-profit, 4-year	10.9%	11.3%
VA	Northern Virginia Community College	Public, 2-year	16.5%	14.6%
WA	Bellevue College	Public, 4-year	17.2%	17.6%
WA	Edmonds Community College	Public, 2-year	11.0%	10.8%
WA	Highline Community College	Public, 2-year	15.3%	15.6%
WA	Renton Technical College	Public, 2-year	11.2%	12.6%
WA	Seattle Community College – Central Campus	Public, 4-year	10.6%	11.4%
WA	Seattle Community College – North Campus	Public, 2-year	10.2%	9.8%

State	Institution^a	Sector	% ANHPI AY2011-12	% ANHPI Fall 2011
WA	Seattle Community College – South Campus	Public, 4-year	12.8%	13.4%
WA	Shoreline Community College	Public, 2-year	10.9%	11.0%

Source: CRS analysis using IPEDS data and information on institutions designated eligible for Title III Parts A and F and Title V from FY2007 through FY 2013 from the U.S. Department of Education website, at <http://www2.ed.gov/about/offices/list/ope/itudes/eligibility.html#el-inst> as of March 5, 2014.

Notes:

- a. Keweenaw Bay Ojibwa Community College in Baraga, Michigan was eliminated manually because its reported ANHPI enrollment was assumed to be a data error. State Center Community College District in Fresno California was also eliminated manually, as it is an administrative unit aggregating and reporting enrollment data for several individual institutions whose enrollment data cannot be disaggregated.

