



Improving Titles III & V of the Higher Education Act to Better Serve Students of Color and Students From Low-Income Backgrounds





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THE HIGHER EDUCATION ACT (HEA) INCLUDES TWO TITLES, TITLES III AND V, THAT DIRECT THE U.S. DEPARTMENT OF EDUCATION TO PROVIDE FEDERAL FUNDING FOR POSTSECONDARY INSTITUTIONS THAT APPLY AND RECEIVE FEDERAL DESIGNATION AS MINORITY-SERVING INSTITUTIONS (MSIS).

There are seven MSI designations: Historically Black Colleges and Universities (HBCUs), American Indian Tribally Controlled Colleges and Universities (TCCUs), Hispanic-Serving Institutions (HSIs), and Alaska Native and Native Hawaiian-Serving Institutions (ANNHSIs), Asian American and Native American Pacific Islander-Serving Institutions (AANAPISIs), Predominantly Black Institutions (PBIs), and Native American-Serving Nontribal Institutions (NASNTIs).

HBCUs and TCCUs were founded with a unique mission to educate Black students amid the enslavement and segregation of Black Americans, and TCCUs were founded and chartered by tribal nations for the self-determination of Indigenous communities. Because HBCUs and TCCUs were founded specifically to provide higher education opportunities to Black and Indigenous students, respectively, they are considered mission-based MSIs. Hispanic-serving institutions (HSIs), Alaska Native and Native Hawaiian-serving institutions (ANNHSIs), Asian American and Native American Pacific Islander-serving institutions (AANAPISIs), predominantly Black institutions (PBIs), and Native American-serving nontribal institutions (NASNTIs) are considered “enrollment-based” MSIs, because their federal designation as MSIs is based on the percentage of students of color they enroll at the undergraduate level.

Currently, 1 in 5 higher education institutions are designated as minority-serving institutions (MSIs).¹ Collectively, these institutions enroll more than 25% of all undergraduate students in the entire country,² and half of all undergraduate students of color in the U.S.³ Many of these students come from low-income backgrounds and are Pell Grant recipients,⁴ and nearly half of all MSI students are the first in their families to attend college.⁵

Despite the growing enrollment of students of color at postsecondary institutions, the subsequent rise of higher education institutions meeting enrollment thresholds for MSI designations, the disproportionate impact of the COVID-19 pandemic on students of color and the institutions that serve them, and the outsized contributions of MSIs, which are important drivers of economic mobility, Titles III and V of HEA have not been revised since their inception. It's high time they were updated.

With that in mind, EdTrust researchers interviewed practitioners and leaders at federally designated MSIs to learn how Congress and the U.S. Department of Education (ED) could update Titles III and V to better serve students of color and students from low-income backgrounds at MSIs. We spoke with leaders at 22 different higher education institutions representing a total of five MSI designations and a total of nine U.S. Department of Education federally funded programs for institutions with MSI designations. Leaders were asked to think about how they would amend Titles III and V to better fit the needs of 21st-century students and ensure their students' success. They were also asked to consider how COVID relief funds provided to higher education institutions at the start of the pandemic impacted students and institutions and whether that funding legislation might be a model for additional investment in the nation's MSIs. We conducted one-hour interviews on Zoom with one to three leaders at each institution from March to November 2022. We spoke to current and former Title III/V project directors, MSI program evaluators, institutional presidents, vice presidents, and directors of institutional advancement.

The eight insights summarized below were gleaned from conversations with MSI leaders:

- 1.** Competitive Title III/V funding for enrollment-based MSIs does not account for institutional diversity (type, size, and location) within MSI designations, and funding varies per enrollment-based MSI designation.

- 2.** Allowable activities for Title III/V funding are broad, but there is room to include additional allowable activities based on current student needs, which were heightened by the COVID-19 pandemic.

- 3.** A growing number of higher education institutions meet multiple MSI designations.

- 4.** There is a time lag between dispersal of Title III/V funds by the U.S. Department of Education and Title III/V program implementation at higher education institutions.

- 5.** Federally mandated Annual Performance Reports (APRs), program evaluation plans, and U.S. Department of Education site visits leave room for improvement.

- 6.** Use of Title III and V funds for establishing or increasing institutional endowments is limited.

- 7.** Title III and V funding is insufficient to cover all Title III/V project costs, and some Title III/V projects aren't institutionalized.

- 8.** Title III formula funding is crucial for HBCUs and TCCUs but insufficient to meet their broader physical and technological infrastructure needs.

Based on these insights from MSI leaders, EdTrust developed recommendations on specific ways that Congress and ED could update Titles III and V. We asked interview participants, MSI scholars, and advocates from academia, policy organizations, associations, and special interest groups to provide feedback on these recommendations. In addition, we met with members of ED to learn more about the department's Title III and Title V program implementation as we drafted these policy recommendations. ED's comments are reflected in this report.

Here are EdTrust's seven policy recommendations for updating Titles III and V of the HEA:

1. Congress should increase annual Title III and V program funding for HBCUs, TCCUs, and MSIs. Funding for HBCUs and TCCUs, which have unique missions, and funding for enrollment-based MSI programs should be based on different considerations.

2. The Department of Education should include program selection criteria outlining proposed institutionalization efforts for competitive Title III/V programs that do not currently include them and weigh these criteria more heavily.

3. The Department of Education should publish information about institutions that receive Title III/V competitive funding eligibility waivers.

4. The Department of Education should provide guidance to competitive Title III/V applicants on how best to include allowable activities that are not explicitly outlined in HEA Titles III and V.

5. The Department of Education should provide guidance to all Title III/V grantees about pre-award costs.

6. The Department of Education should provide additional specialized technical assistance to competitive Title III and V funding recipients to better leverage Title III/V funding for students of color.

7. The Department of Education, White House Initiatives, and all federal agencies with MSI funding opportunities should increase efforts to help higher education institutions learn about and apply for additional federal MSI funding outside of HEA Titles III and V.

1. Allen W. R., Jewell J. O. (2002). "A backward glance forward: Past, present and future perspectives on historically Black colleges and universities." *Review of Higher Education*, 45(3), 241–261.

2. Espinosa, L.L., Turk, J.M., Taylor, M. (2017). *Pulling Back the Curtain: Enrollment and Outcomes at Minority Serving Institutions*. American Council on Education. <https://www.acenet.edu/Documents/Pulling-Back-the-Curtain-Enrollment-and-Outcomes-at-MSIs.pdf>.

3. Allen W. R., Jewell J. O. (2002). "A backward glance forward: Past, present and future perspectives on historically Black colleges and universities." *Review of Higher Education*, 45(3), 241–261.

4. "Total Number of Degree-Granting Title IV Institutions and Their Average Percentage of Low-Income Undergraduates, by Sector, Minority-Serving Status of Institution, and Population Served: Fiscal Year 2004." *IPEDS Data Explorer*, U.S. Department of Education Institute of Education Sciences, nces.ed.gov/ipeds/Search/ViewTable?tableId=4012.

5. "A Brief History of MSIs (2014)." Rutgers Center for Minority Serving Institutions, <https://cmsi.gse.rutgers.edu/content/brief-history-msis#:~:text=And%20not%20surprisingly%2C%20almost%20one,Resources>.



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Introduction

The Origin of MSI Designations in the Higher Education Act

To understand how Minority-Serving Institution (MSI) designations in the Higher Education Act came about, we must start with the founding of this country and its earliest education policies. Enslaved Black people in this country were only considered three-fifths of a person until 1868. Native Americans were not given full birthright citizenship by the government inhabiting their ancestral lands until 1924. As our formal education systems were established, they replicated and exacerbated these inequities. Many states made it illegal to teach free or enslaved Black people to read. To “kill the Indian but save the man,” the federal government forced Native Americans into boarding schools rife with abuse and banned teaching in Indigenous languages.

When the Second Morrill Land-Grant Act of 1890 mandated that each state desegregate their designated land-grant institution, or establish a separate institution for Black students, it was not out of goodwill, but a compromise with the new South.¹ Along with Black Codes, states used the Morrill Act to enforce segregation, creating a pattern of inequity for these institutions from their beginnings.² States limited the institutions to teaching industrial trades, rejecting classical, liberal arts, or professional programs. Even after the landmark *Brown v. Board of Education* ruling in 1954, states continued to underfund and disenfranchise institutions that served Black and Indigenous students.

With the Higher Education Act of 1965 (HEA), Congress later designated funding to strengthen institutions' infrastructure, institutional capacity, and financial stability. Tribally controlled colleges and universities (TCCUs) received federal recognition in the Tribally Controlled Colleges and Universities Assistance Act of 1978, and historically Black colleges and universities (HBCUs) received formal designation in the 1986 amendments to HEA. Today, there are seven different U.S. Department of Education (ED) minority-serving institution (MSI) designations in Title III and Title V of HEA, and the U.S. Department of Education (ED) provides federal funding for each MSI designation through several programs. See Table 1 below for detailed definitions of each of the seven MSI designations and the respective ED federal funding programs available within each MSI designation.

While HBCUs and TCCUs are MSI designations, we separate these two designations from the other five MSI designations, given that HBCUs were founded with the unique mission of educating Black students amid the enslavement and segregation of Black Americans, and TCCUs were founded and chartered by tribal nations for the self-determination of Indigenous

communities. Additionally, there are more than 400 treaties between the federal government and tribal nations, and several Supreme Court decisions, outlining the responsibility of the federal government to ensure the health, welfare, and education of tribal nations, in exchange for land given by tribal nations to the federal government.³ Thus, the federal government has a legal responsibility to provide an education to Indigenous communities.

Because HBCUs and TCCUs were founded specifically to provide higher education opportunities to Black and Indigenous students, respectively, they are considered “mission-based” MSIs. Hispanic-serving institutions (HSI), Alaska Native and Native Hawaiian-serving institutions (ANNHSI), Asian American and Native American Pacific Islander-serving institutions (AANAPISI), predominantly Black institutions (PBI), and Native American-serving nontribal institutions (NASNTI) are subsequently considered “enrollment-based” MSIs, because their federal designation as MSIs is based on the percentage of students of color they enroll at the undergraduate level. As such, we use the terms “HBCUs, TCCUs, and MSIs” throughout this report. The distinction between “mission-based” and “enrollment-based” MSIs is important as we discuss how to ensure that federal investments to these institutions ultimately serve the students of color who are the intended beneficiaries of these investments. Most mission-based MSIs serve student bodies in which students of color are the majority, but this can differ per enrollment-based MSI.

Updating Titles III and V of the Higher Education Act to Better Serve Students of Color at MSIs

Currently, 1 in 5 higher education institutions are designated as MSIs.⁴ Collectively, these institutions enroll 4.8 million students — that’s more than 25% of all undergraduate students in the entire country,⁵ and half of all undergraduate students of color in the U.S.⁶ What’s more, these institutions not only educate students of color, but they also disproportionately invest in students from low-income backgrounds. Nearly half of all students at MSIs are the first in their families to attend college⁷ and are Pell Grant recipients.⁸ In 2012, roughly 98% of Black students at HBCUs and Indigenous students at TCCUs qualified for federal need-based aid.⁹

Yet, while a significant number of higher education institutions are designated as MSIs, HBCUs, TCCUs, many are significantly underfunded compared to their non-MSI counterparts, and have been from the start. An analysis of per-pupil state funding at the nation’s 18 public land-grant HBCUs in the South compared to their predominantly white land-grant school counterparts over the last three decades found that these institutions have been underfunded by an aggregate of \$12.8 billion.¹⁰ A look at federal and state revenue per full-time-equivalent (FTE) student at MSIs versus non-MSIs found that four-year MSIs receive less revenue per full-time-equivalent (FTE) student than do four-year non-MSIs. As of FY 2010, there was a total revenue difference (this includes education and general expenditures minus auxiliaries and other expenses) of \$13,185 per FTE student between four-year MSIs and their non-MSI counterparts.¹¹ Federal investments in MSIs under Titles III and V of the HEA recognize the need for “equalizing educational opportunity” for students of color and students from low-income backgrounds,¹² given federal and state underfunding of these institutions compared to non-MSIs.

Despite chronic federal and state underinvestment in these institutions, HBCUs, TCCUs, and MSIs play a major role in ensuring the success of students of color and contribute significantly to local and national economies. In 2014 alone, HBCUs accounted for only 3% of public and nonprofit private institutions receiving federal student aid, yet were responsible for 17% of all bachelor’s degrees earned by Black Americans and 24% of degrees earned by Black Americans in STEM fields.¹³ As of 2014, the 50,000-plus HBCU graduates could collectively expect to earn \$130 billion over their lifetimes — 56% more than they could expect to earn without their college credentials.¹⁴ Meanwhile, the nation’s HBCUs generate \$14.8 billion in economic impact annually — which is equivalent to a ranking in the top 200 on the Fortune 500 list of America’s largest corporations.¹⁵ They also generate 134,090 jobs annually for their local and regional economies.

Similarly, in 2019-2020, HSIs represented only 18% of all colleges and universities,¹⁶ yet produced over half of the Latinos who earned a college degree in those years.¹⁷ In 2018, AANAPISIs represented only 5% of all colleges and universities,¹⁸ yet were responsible for half of all AAPI associate degrees, and a quarter of all AAPI bachelor's degrees.¹⁹ Additionally, research on the ability of MSIs to help students move up the economic ladder found that four-year MSIs move more students from the bottom two income quintiles to the top two income quintiles than four-year non-MSIs.²⁰ Four-year HSIs, PBIs, and HBCUs, in particular, have a mobility rate that is double that of four-year non-MSIs (approximately 20% compared to 9%).²¹

Despite the outsized presence, impact, and growth of MSIs — the Department of Education projects that students of color will make up almost half of all college students by 2025,²² which will, in turn, increase the number of institutions that are eligible to be designated as MSIs — Titles III and V of HEA have not been revised since their inception.

Given the increased enrollment of students of color in postsecondary institutions, the subsequent rise of higher education institutions meeting enrollment thresholds for MSI designations, and the outsized impact of MSIs on our local and national economies, it is crucial that Titles III and V be updated by Congress and the administration of federal programs under these titles be evaluated by the U.S. Department of Education to better serve students of color and students from low-income backgrounds enrolling at MSIs.

Moreover, legislative and administrative updates to Titles III and V to strengthen support for the nation's MSIs are urgently needed, given students' and institutions' heightened needs in the wake of the COVID-19 pandemic, the Supreme Court's ruling on affirmative action in college admissions, and state legislation defunding and banning college access and success initiatives that support students of color on college campuses.

Learning From COVID-19 Relief

The COVID-19 pandemic was difficult for students at higher education institutions, and for the institutions themselves, which had to rapidly adapt to the global pandemic. In recognition of this, Congress authorized several bills providing funding to higher education institutions and students to support them at the start of the pandemic.

Signed in March 2020, Congress authorized the bipartisan CARES Act — the largest stimulus bill in U.S. history, totaling roughly \$2 trillion dollars. More than \$14 billion were allocated specifically for higher education. And roughly \$1 billion of those funds were earmarked for HBCUs and MSIs. The other \$12.5 billion were distributed to higher education institutions based on their national share of Pell Grant recipients, and the formula considered part-time and full-time students equally. In addition to using an equitable formula, the CARES Act required colleges to put at least half of the funds received toward direct emergency aid to students.

The Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) signed by Congress in December 2020 provided \$22.7 billion to higher education institutions,²³ while the American Rescue Plan of 2021 set aside 5% of the \$39.5 billion allocation for HBCUs, TCCUs, and MSIs. All the bills allowed a wide variety of uses for funds, but the emphasis was on providing emergency grants to the students who needed them most. Institutions were also required to implement evidence-based practices to monitor and stop the spread of COVID-19 and inform students how to apply for emergency aid and financial aid adjustments.

As Congress considers ways to strengthen support for MSIs, it should look to the COVID-19 relief bills adopted at the start of the pandemic and their success in addressing student and institutional needs at MSIs. Additional fiscal investment in MSIs through these relief bills and the flexible use of relief funds provided to students had an outsized impact on the retention and completion of students of color at these institutions. As such, Congress should consider additional fiscal investments in MSIs and provide direct grants with flexible use to students at these institutions. Barriers faced by students of color and students from low-income backgrounds to accessing and completing a postsecondary education were only exacerbated by the COVID-19 pandemic and have not yet been fully dismantled; hence the crucial need to strengthen support for the nation's MSIs.



TABLE 1: MINORITY-SERVING INSTITUTIONS (MSIS) DEFINED IN TITLES III & V OF THE HIGHER EDUCATION ACT (HEA)

MSI Designation	Federal Recognition	Federal Eligibility	Corresponding Title III and V ED Federally Funded Programs
Historically Black colleges and universities (HBCUs)	Higher Education Act of 1965 ²⁴	Any Historically Black College or University that was established prior to 1964, whose principal mission was, and is, the education of Black Americans.	Strengthening HBCUs Program (HEA Title III, Part B) [Formula Grants] Strengthening Historically Black Graduate Institutions (HBGI) Program (HEA Title III, Part B) [Formula Grants]
American Indian tribally controlled colleges and universities (TCCUs)	Tribally Controlled College or University Assistance Act of 1978 ²⁵	An institution that qualifies for funding under the Tribally Controlled Colleges and Universities Assistance Act of 1978 (25 U.S.C. 1801 et seq.) or the Navajo Community College Act (25 U.S.C. 640a note) or is cited in Section 532 of the Equity in Educational Land-Grant Status Act of 1994 (7 U.S.C. 301 note).	Strengthening Institutions Program (HEA Title III, Part A) [Formula Grants] Strengthening HBCUs and Other MSIs Program (Title III, Part F) [Formula Grants]
Hispanic-serving institutions (HSIs)	Higher Education Act of 1992 ²⁶	An institution that has an enrollment of undergraduate full-time equivalent students that is at least 25% Hispanic students at the end of the award year immediately preceding the date of application, has an enrollment of “needy students,” ²⁷ and low average educational and general expenditures per full-time equivalent undergraduate student, in comparison with the average educational and general expenditures per full-time equivalent undergraduate student of institutions that offer similar instruction.	Developing Hispanic-Serving Institutions Program (HEA Title V, Part A) [Competitive Grants] Promoting Postbaccalaureate Opportunities for Hispanic Americans Program (HEA Title V, Part B) [Competitive Grants] HSI Science, Technology, Engineering, or Mathematics (STEM) and Articulation Programs (Title III, Part F) [Competitive Grants]
Alaska Native and Native Hawaiian-serving institutions (ANNHSIs)	Higher Education Act of 1998 ²⁸	An Alaska Native-serving institution is an institution that has an enrollment of undergraduate students that is at least 20% Alaska Native students, has an enrollment of “needy students,” ²⁹ and low average educational and general expenditures per full-time equivalent undergraduate student, in comparison with the average educational and general expenditures per full-time equivalent undergraduate student of institutions that offer similar instruction. A Native Hawaiian-serving institution is an institution that has enrollment of undergraduate students that is at least 10% Native Hawaiian students, has an enrollment of “needy students,” ³⁰ and low average educational and general expenditures per full-time equivalent undergraduate student, in comparison with the average educational and general expenditures per full-time equivalent undergraduate student of institutions that offer similar instruction.	Strengthening Institutions Program (HEA Title III, Part A) [Competitive Grants] Strengthening HBCUs and Other MSIs Program (Title III, Part F) [Competitive Grants]

MSI Designation <i>continued</i>	Federal Recognition <i>continued</i>	Federal Eligibility <i>continued</i>	Corresponding Title III and V ED Federally Funded Programs <i>continued</i>
Asian American and Native American Pacific Islander-serving institutions (AANAPISIs)	College Cost and Reduction and Access Act of 2007 ³¹	An institution that has an enrollment of undergraduate students that is at least 10% students who are Asian American or Native American Pacific Islander, has an enrollment of “needy students,” ³² and low average educational and general expenditures per full-time equivalent undergraduate student, in comparison with the average educational and general expenditures per full-time equivalent undergraduate student of institutions that offer similar instruction.	Strengthening Institutions Program (HEA Title III, Part A) [Competitive Grants] Strengthening HBCUs and Other MSIs Program (Title III, Part F) [Competitive Grants]
Predominantly Black institutions (PBIs)	Higher Education Opportunity Act of 2008 ³³	An institution that has an enrollment of undergraduate students that is at least 40% Black American students, has an enrollment of “needy students,” ³⁴ and low average educational and general expenditures per full-time equivalent undergraduate student, in comparison with the average educational and general expenditures per full-time equivalent undergraduate student of institutions that offer similar instruction.	Strengthening Institutions Program (HEA Title III, Part A) [Formula Grants] Strengthening HBCUs and Other MSIs Program (Title III, Part F) [Competitive Grants]
Native American-serving non-tribal institutions (NASNTIs)	Higher Education Opportunity Act of 2008	An institution that has an enrollment of undergraduate students that is at least 10% Native American students and is not a tribally controlled college or university (TCCU), has an enrollment of “needy students,” ³⁵ and low average educational and general expenditures per full-time equivalent undergraduate student, in comparison with the average educational and general expenditures per full-time equivalent undergraduate student of institutions that offer similar instruction.	Strengthening Institutions Program (HEA Title III, Part A) [Competitive Grants] Strengthening HBCUs and Other MSIs Program (Title III, Part F) [Competitive Grants]

**It is important to note that all institutions, except HBCUs and TCCUs, must apply to the Department of Education to receive federal designation as a specific MSI. Only after these institutions have been federally designated as a specific MSI type by the Department of Education can these institutions apply for competitive federal funding for MSIs from the U.S. Department of Education or other federal agencies. Given that this federal funding is competitive, not all MSIs that apply for federal funding from the Department of Education or other federal agencies receive funding. Explore data on the number of institutions that have received federal MSI designations from the Department of Education and institutions that have gotten competitive federal funding from the Department Education from 2017 to 2021 [here](#).³⁶*

Project Description

This report is the product of interviews with institutional leaders at MSIs. The leaders were asked to think about the ways in which they would amend Titles III and V to ensure their students' success and to better fit the needs of 21st-century students. We also asked leaders to consider how COVID relief funds impacted students and their institutions and whether that funding legislation could be a model for additional investment in the nation's MSIs and amending Titles III and V.

This project centers the perspectives of institutional leaders at MSIs as experts on the needs of their institutions and the students who attend them. While those closest to the problem are closest to the solution, their voices are often left out of research and key discussions about changing laws that impact their work and students. We spoke with leaders at 22 different higher education institutions representing a total of five MSI designations and a total of nine U.S. Department of Education (ED) federally funded programs for institutions with MSI designations. Each of these institutions has a federal ED MSI designation and has also received Title III/V funding under one or more of the ED federally funded programs within their respective MSI designation. Table 2 below describes the key characteristics of each institution. Table 1 provides detailed definitions of each of the seven MSI designations and lists the respective ED federal funding programs available within each MSI designation.

This is not an exhaustive list of all the MSI designations or ED federal funding programs available within each MSI designation. We intentionally interviewed leaders from institutions of diverse sizes, settings, sectors, and geographical regions because student and institutional needs vary based on these factors. An AANAPISI in a metropolitan city in the Northeast, a TCCU on a reservation in the Midwest, and an HSI in a coastal suburb have very different students, very different resources, and very different needs.

We conducted one-hour interviews on Zoom with one to three leaders at each institution from March to November 2022. In addition to current and former Title III/V project directors, we spoke to program evaluators for MSIs, institutional presidents, vice presidents, and directors of institutional advancement. Our interview protocol is included in the Appendix. Our team analyzed interview responses for themes, divergences, and innovations. The insights below are a summary of interview participants' firsthand perspectives.

We relied on external experts in various ways. First, we interviewed three scholars who are current or former leaders, faculty, and advocates of HBCUs and AANAPISIs. Second, we asked interview participants, scholars and advocates from academia, policy organizations, associations, and special interest groups to provide feedback on legislative and administrative recommendations for Titles III and V, which Ed Trust researchers developed based on insights gathered from interview participants. Third, we met with members of ED to learn more about the department's Title III and Title V program implementation. Their comments are reflected in this report. Our recommendations for changes to Titles III and V are based on leaders' insights, conversations with members of ED, and our own expertise and commitment to racial equity.

Amending Titles III and V to further support higher education institutions that serve students of color (MSIs) could lead states to invest in similar efforts. In the meantime, we hope leaders like those we interviewed will keep pushing for changes to the law that prioritize the needs of underserved students of color who've long been given short shrift but are just as deserving of educational resources and opportunities as their peers at PWIs.

TABLE 2: DESCRIPTIONS OF INSTITUTIONS IN THE PROJECT

Institution Type	Region	Sector	Size	Setting
AANAPISI 1	Northwest	Public 4-yr	5,000-9,999	Suburb
AANAPISI 2	West	Public 4-yr	20,000 +	City
AANAPISI 3	Northeast	Public 4-yr	20,000 +	City
AANAPISI 4	Northeast	Public 4-yr	10,000-19,999	City
ANNH	Pacific	Public 4-yr	1,000-4,999	City
TCCU 1	West	Public 4-yr	Under 1,000	Rural
TCCU 2	Midwest	Public 2-yr	Under 1,000	Rural
TCCU 3	Midwest	Private 4-yr	Under 1,000	Suburb
TCCU 4	West	Public 4-yr	Under 1,000	Rural
TCCU 5	Midwest	Public 2-yr	Under 1,000	Rural
HBCU 1	Southeast	Private 4-yr	Under 1,000	City
HBCU 2	Southeast	Public 4-yr	5,000-9,999	City
HBCU 3	Southeast	Private 4-yr	1,000-4,999	City
HBCU 4	Southeast	Public 2-yr	1,000-4,999	City
HSI 1	Southwest	Public 4-yr	20000 +	City
HSI 2	West	Public 2-yr	5000-9999	Rural
HSI 3	West	Public 2-yr	10,000 - 19,999	City
HSI 4	Southwest	Public 4-yr	20,000 +	City
HSI 5	West	Public 4-yr	20,000 +	City
HSI 6	West	Public 4-yr	20,000 +	Suburb
HSI 7	West	Public 4-yr	5,000-9,999	Suburb
HSI 8	Northwest	Public 2-yr	1,000-4,999	City

About HEA Titles III & V

The Higher Education Act of 1965 (HEA) governs the administration of federal higher education programs.³⁷ These programs support students who aspire to pursue or are pursuing a higher education and provide federal support to higher education institutions. The HEA is organized into eight titles. Two of them — Titles III and V — specifically detail federal assistance for institutions that have large concentrations of students of color and students from low-income backgrounds.

Title III of the Higher Education Act provides aid to these higher education institutions for the purpose of “equalizing educational opportunity” for students of color and students from low-income backgrounds.³⁸ Within this title, there are seven parts (A, B, C, D, E, F, and G) that detail aid from ED to these institutions for varying purposes. Part C has not been funded since 1995, some programs within Part E have never been funded, and Part G contains general provisions.

HEA Title III, Part A: Strengthening Institutions Program awards competitive grants to multiple higher education institutions, including those listed below — with the exception of tribally controlled colleges and universities (TCCUs) and predominantly Black institutions (PBIs), which receive [formula grants](#), rather than competitive grants — for the purpose of helping those institutions “plan, develop, or implement activities that promise to strengthen the institution.”³⁹ The five types of institutions that are eligible for funding under this part are:

1. Tribally controlled colleges and universities (TCCUs)
2. Alaska Native-serving and Native Hawaiian-serving institutions (ANNHSIs)
3. Predominantly Black institutions (PBIs)
4. Native American-serving, non-tribal institutions (NASNTIs)
5. Asian American and Native American Pacific Islander-serving institutions (AANAPISIs)

To be eligible for this competitive funding, all the institutions above (except TCCUs) and any higher education institution seeking funding under this part must not only enroll a certain percentage of undergraduate students of color, but must meet two main requirements (see Table 1 above for detailed definitions of each MSI designation, including respective institutional enrollment requirements):

1. An institution must have a substantial percentage of enrolled students receiving federal need-based assistance,⁴⁰ and
2. have lower average educational and general expenditures per full-time equivalent (FTE) undergraduate student than those of comparable institutions that offer similar instruction.⁴¹

Additionally, institutions can apply to have either or both requirements waived by the Department of Education.⁴²

Higher education institutions may be eligible for more than one federal MSI designation based on the students they serve. However, Titles III and V limit the federal grants they can receive simultaneously

HEA Title III, Part B: Strengthening Historically Black Colleges and Universities allocates formula grants to historically Black colleges and universities (HBCUs), including graduate institutions, that were established prior to 1964, for the purpose of “enhancing Black postsecondary institutions to ensure their continuation and participation in fulfilling the federal mission of equality of educational opportunity.”⁴³

HEA Title III, Part C: Endowment Challenge Grants for Institutions Eligible for Assistance Under Part A or Part B awards competitive grants to higher education institutions listed under HEA Title III, Part A, and Title III, Part B, that offer a postgraduate degree, for the purpose of establishing or increasing endowment funds at these institutions.⁴⁴ The program has not been funded since FY 1995.⁴⁵

HEA Title III, Part D: Historically Black College and University Capital Financing provides loans to public and private HBCUs that were established prior to 1964 to help finance capital improvements at these institutions.⁴⁶ Through this program, institutions receive loans issued as bonds by a designated bonding authority chosen by the secretary of education. To date, the program has originated 126 loans to 51 HBCUs, including 16 public HBCUs and 35 private HBCUs.⁴⁷

HEA Title III, Part E: Minority Science and Engineering Improvement Program awards competitive grants to higher education institutions and partners with higher education institutions where more than 50% of all students enrolled are students of color to increase the participation of students of color in science, technology, engineering, or mathematics (STEM) careers.⁴⁸

HEA Title III, Part F: Strengthening Historically Black Colleges and Universities and Other Minority-Serving Institutions awards competitive grants to qualifying MSIs (see the five designations outlined in HEA Title III, Part A), HBCUs, and Hispanic-serving institutions (HSIs). Part F provides funding to HSIs for “HSI STEM and Articulation Programs” that are designed to increase the number of Hispanic and other low-income students attaining degrees in STEM fields and develop model transfer and articulation agreements between STEM programs at two-year HSIs and four-year institutions. Part F also provides competitive grants to eligible PBIs for programs that are designed to improve the educational outcomes of African American males in areas such as STEM; health education; internationalization and globalization; and teacher preparation.



Title V of the Higher Education Act provides competitive grants to HSIs to “improve and expand their capacity to serve Hispanic students and other low-income individuals.”⁴⁹ This title has two parts (A and B) that provide aid to these institutions for varying purposes. To be eligible for this competitive funding, HSIs must meet key two requirements, in addition to having the required 25% full-time equivalent undergraduate enrollment of Hispanic students (see Table 1 above for detailed definitions of each MSI designation, including their enrollment requirements):

1. An institution must have a substantial percentage of enrolled students receiving federal need-based assistance, and
2. have lower average educational and general expenditures per full-time equivalent undergraduate student than institutions that offer similar instruction.⁵⁰

Additionally, institutions can apply to have either or both requirements waived by the Department of Education.⁵¹

HEA Title V, Part A: Hispanic-Serving Institutions awards competitive grants to HSIs to “assist the institutions to plan, develop, undertake, and carry out programs to improve and expand” their capacity “to serve Hispanic students and other low-income students.”⁵²

HEA Title V, Part B: Promoting Postbaccalaureate Opportunities for Hispanic Americans awards competitive grants to HSIs, to “expand postbaccalaureate educational opportunities for, and improve the academic attainment of, Hispanic students.”⁵³

Higher education institutions may be eligible for more than one federal MSI designation based on the students they serve. However, Titles III and V limit the federal grants they can receive simultaneously (see Table 3 below).



TABLE 3: CONCURRENT ED FUNDING LIMITATIONS FOR MINORITY-SERVING INSTITUTIONS (MSIS) IN THE HIGHER EDUCATION ACT (HEA)

ED MSI Program Stream	AAAPISI-A	AAAPISI-F	ANNH-A	ANNH-F	HBCU-B**	HBCU-F	HBGI**	DHSI	HSI-STEM	MASNTI-A	MASNTI-F	ANNH-NHSI-A	ANNH-NHSI-F	PBI-A	PBI-F	PPOHA	TCCU-A**	TCCU-F**
AAAPISI-A		Y		Y					Y		Y		Y		Y			Y
AAAPISI-F	Y		Y	Y				Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
ANNH-A		Y		Y					Y		Y		Y		Y			Y
ANNH-F	Y	Y	Y						Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
HBCU-B**						Y	Y											
HBGI**					Y													
DHSI		Y		Y				Y	Y	Y	Y		Y	Y	Y	Y		Y
HSI-STEM	Y	Y	Y	Y				Y		Y	Y	Y	Y	Y	Y	Y	Y	Y
NASNTI-A		Y		Y					Y		Y		Y		Y			
NASNTI-F	Y	Y	Y	Y				Y	Y	Y	Y	Y	Y	Y	Y	Y		
ANNH-NHSI-A		Y		Y					Y		Y		Y	Y	Y			Y
ANNH-NHSI-F	Y	Y	Y	Y				Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
PBI-A		Y		Y					Y		Y		Y	Y	Y	Y	Y	Y
PBI-F	Y	Y	Y	Y				Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
PPOHA		Y		Y				Y	Y		Y		Y		Y			Y
TCCU-A*		Y		Y					Y				Y		Y			Y
TCCU-F**	Y	Y	Y	Y				Y	Y			Y	Y	Y	Y	Y	Y	Y

* Limited to tribal colleges and universities that qualify for funding under the Tribally Controlled College or University of 1978 or the Navajo Community College Assistance Act of 1978.

** Limited to institutions as defined by the Higher Education Act of 1965, as amended. The HBCU program is limited to institutions that meet the criteria in Section 322(2) of the HEA, the HBGI program is limited to the 24 institutions and programs listed in section 326(e) of the HEA.

All ED MSI Program Stream Names with an “-A” at the end refer to the program cited in HEA Title III, Part A. All ED MSI Program Stream Names with an “-F” at the end refer to the program cited in HEA Title III, Part F. “HBCU-B” refers to HEA Title III, Part B.

The table above was adapted from the [U.S. Department of Education’s FY 2023 Eligibility Matrix for Title III and V Programs](#).

Insights from MSI Interviewees

Below are eight key insights gleaned from our conversations with institutional leaders across 22 different institutions representing five different MSI designations.

In addition to current and former Title III/V project directors, we spoke to program evaluators for MSIs, institutional presidents, vice presidents and directors of institutional advancement. Most of the institutional leaders we spoke to are Title III/V project directors. The project directors we spoke to have varying years of experience managing Title III/V projects.

While the insights below are summaries based on participants' firsthand perspectives, we added additional context about Title III and Title V program implementation based on our conversations with members of ED.

Insight 1: Competitive Title III/V Funding for Enrollment-Based MSIs Does Not Account for Institutional Diversity (Type, Size, and Location) Within MSI Designations, and Funding Varies per Enrollment-Based MSI Designation

Institutions that receive Title III and Title V funding vary in size, sector, setting, resources, and research activity, and have different needs. Many of the leaders we spoke with noted that competitive Title III and V funding for enrollment-based MSIs (all MSI designations but HBCUs and TCCUs) does not account for the diversity of institutions within these MSI designations and differs per enrollment-based MSI designation.

As if to highlight the range of institutions with enrollment-based MSI designations, a leader from HSI 8 noted that their institution is a community college on a tribal reservation that, at the start of the COVID-19 pandemic, struggled to ensure that students had access to the internet because access in their region is limited. Meanwhile, a leader from HSI 3 noted that their institution is a large community college that serves students from both sides of the U.S.–Mexico border. What's more, differences in resources and capacity among higher education institutions serving students of color may directly impact an institution's ability to apply for competitive Title III/V funding once they receive an MSI designation from ED. For example, a leader from HSI 2, a rural community college, explained that their institution — like many minority-serving community colleges and rural MSIs — lacks the staff capacity to successfully apply for competitive Title V funding. They have no dedicated grant management office or staff person and rely on regular faculty and staff to apply for grants on top of their regular workload. This leader said that having a grant office at their institution would “transform the way that we do business from a grants perspective at the college, period.” The HSI 2 leader also noted that their institution is among the few in their geographic area.

Regarding the different levels of funding across MSI designations, one of the AANAPISI scholars we spoke to shared that over the past decade, there have been varying levels of funding across MSI designations. This scholar noted that the number of higher education institutions that can compete for Title III and Title V funds differs per MSI category and some competitive Title III and V programs have many more institutions competing for funds than others. For example, [as of FY 2023](#), across competitive Title III and V funding eligible for HSIs (Title III Part F, Title V Part A, and Title V Part B), there are about 500 institutions that meet the Title V HSI definition and can compete for this funding. AANAPISIs are eligible for Title III, Part A and Title III, Part F, and some 200 institutions are designated as AANAPISIs and can compete for this funding. The same scholar noted that current levels of competitive Title III and V funding across enrollment-based MSI designations do not account for the number of institutions that are eligible for each MSI designation — nor do these levels account for the total number of students — including the number of students of color — enrolled at each of these institutions. He suggested that competitive Title III and V funding across all enrollment-based MSI designations should be equitable and awarded based on a host of considerations, including the number of institutions eligible for funding in each enrollment-based MSI designation and the total number of students enrolled at an institution. Given that mission-based MSIs like HBCUs and TCCUs were established

for the purpose of educating Black and Indigenous students, respectively, these institutions should be funded at levels based on their historic and ongoing missions, he suggested, not based on the number of institutions that are eligible for funding under their designation or the number of students they enroll. He added that policymakers should recognize the historical and ongoing contributions of all seven MSI designations and should set funding levels for the designations not in comparison to each other, but based upon the unique characteristics of each MSI designation, and keeping in mind the vast resources that predominantly white institutions receive from federal departments and agencies, such as the National Science Foundation, the National Institutes of Health, the National Aeronautics and Space Administration, along with the Department of Education.

Another AANAPISI scholar we spoke to seconded the need to create equitable funding across enrollment-based MSI designations, while noting that there are a growing number of research-intensive MSIs with “more resources” and a different focus than other less-resourced MSIs and that policymakers should consider what funding a research-intensive MSI versus a lower-resourced MSI means. “Research-intensive MSIs could have more of a focus on improving the pipeline to graduate education” this scholar said.

Other leaders we spoke to questioned whether MSIs with more resources should be eligible for the same competitive MSI funding streams for enrollment-based MSI designations. Some suggested that institutions with more resources could apply for either/both waivers of the two key eligibility requirements in Titles III and V.

One of the AANAPISI scholars we spoke to asked: “What does it mean for institutions with a lot of resources to be MSIs? Should they be eligible [for Title III/V funding]? Should they be receiving money, if by receiving money, are they taking away from other campuses that have greater needs? Or are they contributing in a way [that’s] good for society.”



Insight 2: Allowable Activities for Title III/V Funding Are Broad, but There Is Room to Include Additional Allowable Activities Based on Current Student Needs, Which Were Heightened by the COVID-19 Pandemic

Parts A-F of HEA Title III and Parts A-B of HEA Title V describe the “allowable activities” that higher education institutions may carry out with competitive and formula funding they receive. In Table 4 (linked below) we list the collective allowable activities outlined by HEA Titles III and V for all seven MSI designations.

[TABLE 4: ALLOWABLE GRANT ACTIVITIES FOR HEA TITLE III \(PARTS A – F\) AND TITLE V \(PARTS A – B\) PROGRAM FUNDING](#)

While allowable activities for these grants are broad and provide flexibility for recipients to use these funds in various ways — particularly to strengthen student success — the leaders we spoke to agree that the range of allowable activities should be expanded to better reflect the current needs of the students they serve.

For example, many of the leaders suggested that allowable activities should be expanded to include mental health counseling and direct emergency aid to students. A leader from TCCU 1 noted that student mental-health demands, which were rising even before the COVID-19 pandemic, are now at crisis levels, yet the demand for more campus mental-health resources is outstripping funding for those supports. While this leader said that their campus was able to put some of the federal pandemic-relief money it received toward providing more mental-health resources for their students, the institution would not have been able to do so were it not for those funds.

A leader from HBCU 3 noted that in the wake of the pandemic, students are struggling to meet basic needs: A growing number of them lack access to adequate food, housing, medical care, utilities, transportation, and/or can't afford to travel home to be with family after the loss of a loved one. Thanks to the federal COVID relief funding that HBCU 3 received, it was able to give students direct emergency aid for basic needs, which helped many students avoid eviction.

U.S. Department of Education officials confirmed that while the above activities are not explicitly listed as allowable uses, HEA Title III and V funds may be used to support these activities, depending on how Title III/V project proposals are written for consideration by the department. That said, ED discourages institutions from using their Title III/V funds to provide direct aid to students because this activity is not sustainable over the long term.

Current levels of competitive Title III and V funding across enrollment-based MSI designations do not account for the number of institutions that are eligible for each MSI designation — nor do these levels account for the total number of students enrolled at each of these institutions

Insight 3: A Growing Number of Higher Education Institutions Meet Multiple MSI Designations

Some institutions qualify or will qualify for multiple federal MSI designations, and as such, could attempt to pursue concurrent streams of competitive Title III/V funding. The leaders we spoke to, however, noted that there are limits in Titles III and V on concurrent competitive MSI funding that make it difficult for institutions with multiple MSI designations to pursue multiple streams of competitive Title III/V funds in service of the various groups of students of color they serve. A leader from AANAPISI 2 said that over half of all campuses in their state higher education system are federally designated by the U.S. Department of Education as both HSIs and AANAPISIs. One of the AANAPISI scholars we spoke to also noted that about half of all federally designated AANAPISIs in the U.S. are also federally designated HSIs, and there has been a rise in institutions that qualify for multiple MSI designations. City University of New York (CUNY) York College, for example, has three federal MSI designations: AANAPISI, PBI, and HSI.

Various HSI and AANAPISI leaders noted that Titles III and V don't allow HSIs that receive competitive Title V, Part A funding to simultaneously receive a competitive grant from Title III, Part A for AANAPISIs. They also noted that competitive funding levels for enrollment-based MSI designations vary per program (in other words, some MSI enrollment-based designations are allotted more money than others). As a result, higher education institutions with multiple MSI designations are often forced to choose one (higher-paying) grant over another, which can create tensions between faculty and staff who are advocating for federal funding for the student group(s) left behind by such decisions — be they Asian American, Black, Native American, Pacific Islander, or Hispanic. For reference, in FY 2022, the average new award size of a competitive Title III, Part A grant for an AANAPISI was \$294,000 per year.⁵⁴ Because Title III, Part A program grants are awarded for five-year periods, the total average award size for an AANAPISI under this part was \$1.5 million. In comparison, in FY 2022, the average new award size of a competitive Title V, Part A grant for an HSI was \$586,000 per year.⁵⁵ Because Title V, Part A program grants are also awarded for five-year periods, the total average award size for an HSI under this part is \$2.93 million, or almost double that for AANAPISIs under Title III, Part A.

In addition, it is important to note that the concurrent funding limitation that leaders described, where an institution dually designated as an HSI and AANAPISI cannot receive concurrent funding from HEA Title V, Part A for HSIs and Title III, Part A for AANAPISIs, is one of two concurrent funding limitations that exist out of all possible concurrent funding combinations available from Titles III and V for HSIs and AANAPISIs.

As a reminder (see Table 1), institutions that are federally designated as HSIs can apply for federal funding from the following three corresponding ED programs:

1. Developing Hispanic-Serving Institutions Program (HEA Title V, Part A) [Competitive Grants]
2. Promoting Post baccalaureate Opportunities for Hispanic Americans Program (HEA Title V, Part B) [Competitive Grants]
3. HSI Science, Technology, Engineering, or Mathematics (STEM) and Articulation Programs (Title III, Part F) [Competitive Grants]

Institutions that are federally designated as AANAPISIs can apply for federal funding from the following two corresponding ED programs:

1. Strengthening Institutions Program (HEA Title III, Part A) [Competitive Grants]
2. Strengthening HBCUs and Other MSIs Program (Title III, Part F) [Competitive Grants]

As such, institutions that are dually designated as HSIs and AANAPISIs could attempt to pursue the following six funding combinations. According to [ED'S 2023 eligibility matrix](#), institutions can only receive concurrent funding from the first four funding combinations below.

1. AANAPISI funding: Strengthening HBCUs and Other MSIs Program (Title III, Part F) [Competitive Grants]

- i. Average annual award size (FY 2022): \$306,000
HSI funding: Developing Hispanic-Serving Institutions Program (HEA Title V, Part A) [Competitive Grants]
 - ii. Average annual award size (FY 2022): \$586,000
TOTAL award amount for AANAPISI and HSI funding: \$892,000
-

2. AANAPISI funding: Strengthening HBCUs and Other MSIs Program (Title III, Part F) [Competitive Grants]

- i. Average annual award size (FY 2022): \$306,000
HSI funding: Promoting Postbaccalaureate Opportunities for Hispanic Americans Program (HEA Title V, Part B) [Competitive Grants]
 - ii. Average annual award size (FY 2022): \$588,000
TOTAL award amount for AANAPISI and HSI funding: \$894,000
-

3. AANAPISI funding: Strengthening HBCUs and Other MSIs Program (Title III, Part F) [Competitive Grants]

- i. Average annual award size (based on FY 2022): \$306,000
HSI funding: HSI Science, Technology, Engineering, or Mathematics (STEM) and Articulation Programs (Title III, Part F) [Competitive Grants]
 - iii. Average annual award size (FY 2022): \$943,000
TOTAL award amount for AANAPISI and HSI funding: \$1.2 million
-

4. AANAPISI funding: Strengthening Institutions Program (HEA Title III, Part A) [Competitive Grants]

- i. Average annual award size (FY 2022): \$294,000
HSI funding: HSI Science, Technology, Engineering, or Mathematics (STEM) and Articulation Programs (Title III, Part F) [Competitive Grants]
 - iv. Average annual award size (FY 2022): \$943,000
TOTAL award amount for AANAPISI and HSI funding: \$1.2 million
-

5. AANAPISI funding: Strengthening Institutions Program (HEA Title III, Part A) [Competitive Grants]

i. Average annual award size (FY 2022): \$294,000

HSI funding: Promoting Postbaccalaureate Opportunities for Hispanic Americans Program (HEA Title V, Part B) [Competitive Grants]

v. Average annual award size (FY 2022): \$588,000

TOTAL award amount for AANAPISI and HSI funding: \$882,000

6. AANAPISI funding: Strengthening Institutions Program (HEA Title III, Part A) [Competitive Grants]

i. Average annual award size (FY 2022): \$294,000

HSI funding: Developing Hispanic-Serving Institutions Program (HEA Title V, Part A) [Competitive Grants]

vi. Average annual award size (FY 2022): \$586,000

TOTAL award amount for AANAPISI and HSI funding: \$880,000

The leaders we spoke to also noted that the pursuit of concurrent competitive funding among institutions with multiple MSI designations is a contested point because some leaders believe that there are institutions that receive competitive federal MSI funding through an enrollment-based MSI designation but fail to use this funding to improve outcomes for the students of color these grants are meant to help. A leader from AANAPISI 2 noted that some AANAPISIs “take the money and throw it into a reading center, and just by osmosis, [think they’re] helping Asian students,” instead of putting it toward more intentional and targeted initiatives and practices that have been shown to effectively address the needs of Asian American, Native American, and Pacific Islander students on campus. Thus, allowing institutions to pursue two competitive federal MSI program grants could inadvertently send more money to institutions that may not be using this funding in the most impactful way for the students these grants are supposed to serve.

Scholars who study MSIs have argued that institutions that receive competitive federal MSI funding must use it intentionally to serve their students of color. One such scholar, Gina Garcia, a professor at the University of California, Berkeley School of Education and author of [“Hispanic Serving Institutions \(HSIs\) in Practice: Defining ‘Servingness’ at HSIs,”](#) found that many HSIs are not centering Latino students or students of color in their HSI grant proposals or initiatives and are proposing race- and identity-neutral initiatives instead. Moreover, Garcia has introduced the concept of “servingness,” along with a framework, to help HSIs produce more equitable outcomes for Latino students and ensure their holistic success during and after college by centering racial identity, equity, and consciousness.

The leaders we spoke to noted that there are institutions that receive competitive federal MSI funding through an enrollment-based MSI designation but fail to use this funding to improve outcomes for students of color

Insight 4: There Is a Time Lag Between Dispersal of Title III/V Funds by the U.S. Department of Education and Title III/V Program Implementation at Higher Education Institutions

The lengths of competitive and formula funded Title III/V grants awarded to higher education institutions are outlined in HEA Titles III and V. For example, all competitive Title III and V grants are awarded over five years. The Department of Education disperses annual Title III/V grant funds to institutions based on the federal fiscal year (which runs from October 1– September 30), a process which is largely influenced by annual congressional appropriations.

From our conversations with leaders, we learned that the timeline on which the Department of Education disperses annual Title III/V grant funds to institutional recipients doesn't align with the timeline on which institutions operate. While the federal government disperses grant funds on October 1, higher education institutions operate during the academic year, which begins as early as August or as late as September. The leaders said that when institutions receive Title III and V funds after the start of the academic year, the execution of these grants is often delayed. They explained that receiving federal Title III/V grant funds after the academic year is underway makes it nearly impossible to implement Title III/V programs in the same academic year because only after receiving those funds can an institution begin the process of hiring staff to execute the Title III/V project — and the hiring process usually takes eight months to a year, not counting staff training and onboarding. MSI leaders also noted that they must account for project implementation delays in the federally mandated project annual performance reports (APRs) they submit to the Department of Education. Although institutions can ask the Department of Education for a one-year, no-cost extension to their federal Title III/V grant so they can fully implement it, there wouldn't be a need for this if the department's dispersal of federal MSI funds aligned with the academic year, the leaders said.

U.S. Department of Education officials acknowledged the lag and noted that grantees can seek prior approval from ED to expend funds for “pre-award costs” up to 90 days before the October 1 effective date of the Title III/V award.

Insight 5: Federally Mandated Annual Performance Reports (APRs), Program Evaluation Plans, and U.S. Department of Education Site Visits Leave Room for Improvement

The Department of Education evaluates institutions' applications for competitive Title III/V grant funding based on each Title III/V program's selection criteria.⁵⁶ For example, the Title III, Part A program for AANAPISIs has various selection criteria worth a total of 100 points. The “quality of the project evaluation” criterion is worth 15 points and requires institutions to detail their proposed objectives and identify the metrics/data they will use to measure progress toward achieving project objectives.⁵⁷

Additionally, the department requires federal grant recipients who receive multiyear awards to submit an annual performance report (APR) that includes the most current performance and financial expenditure information for the grant received. The MSI leaders we spoke to expressed interest in using required program evaluation plans and APRs to receive feedback from the department on the implementation of their MSI grants and their success in supporting students.

With regard to MSI program evaluation plans, the MSI leaders we spoke to said that Title III/V grantees typically hire external program evaluators to analyze data gathered on progress toward project objectives and measure achievement. Practitioners can also work with individuals from their campus institutional research office or college of education to measure progress on proposed project objectives and analyze their program data. A leader from AANAPISI 1, however, noted that some external program evaluators lack specific expertise in Title III/V project management — including in achieving grant objectives, data collection and analysis, grant budget management, compliance oversight, or specific cultural programming — which may minimize the effectiveness of their evaluations.

Regarding the mandated APRs for these grants, practitioners said that, although they are required to submit reports to the Department of Education, they rarely, if ever, receive feedback from the department, despite a desire for it.

Lastly, although not outlined in federal grant program requirements, MSI leaders noted that the Department of Education has, on occasion, conducted in-person site visits to Title III/V grantee institutions to view the implementation of grant projects. MSI leaders noted that site visits don't take place on a regular schedule, and when the department contacts recipients about an upcoming site visit, practitioners often aren't given guidance on how to prepare for site visits. Practitioners expressed a desire to receive guidance about site visits from the department, so they can make the most of these visits and use them as opportunities to get additional feedback about program implementation, and ultimately, student impact.

U.S. Department of Education officials said that they occasionally conduct in-person site visits to ensure compliance, see how projects are being implemented, and see the great work Title III/V grantees are doing up close. They also noted that they sometimes conduct virtual site visits. During site visits (in-person or virtual), ED staff talk to some students, faculty, and others at the institution to learn more about Title III/V project implementation efforts, but the department doesn't officially publish anything about the site visits it has conducted.



Insight 6: Use of Title III and V Funds for Establishing or Increasing Institutional Endowments Is Limited

As noted earlier, one allowable use of competitive and formula-based Title III/V funds is to establish or improve an institution's endowment fund. But Titles III and V state that institutions may not use more than 20% of the funds received to establish or increase an institutional endowment.⁵⁸ Additionally, the institution must also provide matching funds from non-federal sources, in an amount equal to or greater than the federal funds used to establish or increase the endowment fund.

Our conversations with MSI leaders found that few institutions have capitalized on this allowable use and that leaders are often solely responsible for convincing senior campus leadership to use Title III/V funds for this allowable use, given the matching requirement. Yet the use of Title III/V grant funds to improve or establish an endowment fund could be a powerful tool for MSIs, which have been grossly underfunded for decades and have endowments that are a fraction of the size of those at predominantly white schools, and are, therefore, hindered from using their endowments to support students.

For example, a leader at one AANAPISI said that she successfully urged her institution's development office to use federal AANAPISI grant funds to establish an endowment fund for Asian American and Pacific Islander (AAPI) students. First, though, she had to educate the institution's development team about the large presence, impact, and needs of AAPI students on campus, so the team could determine how to raise money for these students to meet the Title III/V grant-matching requirement. The institution now uses this endowment fund to provide scholarships to AAPI students.

U.S. Department of Education officials said that some institutions that received multiple Title III/V grants over the years have been able to use those funds to establish or boost endowment funds. They noted that the department is responsible for guiding multiple grantees on this allowable activity.

Insight 7: Title III and V Funding Is Insufficient to Cover All Title III/V Project Costs and Some Projects Aren't Institutionalized

Competitive HEA Title III and V funding allows MSIs to fund evidence-based initiatives for students of color and students from low-income backgrounds. These initiatives — as many MSI leaders shared during our conversations — would not be possible without this source of federal funding, especially considering the historical state and federal underfunding of MSIs. While this funding is crucial to MSIs and the students they serve, leaders said that current competitive federal funding for these programs is insufficient, given program costs, and often, initiatives are not institutionalized after their federal grant funding period ends.

Conversations with Title III and V project directors, along with a quick review of public Title III and V project abstracts, revealed the many uses of Title III/V funds in program budgets, all of which require continued funding. For example, regardless of whether program budgets consider “one-time costs” such as curriculum renovation, faculty development, and construction/renovations, or other costs such as program personnel, technology, and annual external program evaluation, all these uses require continued funding to ensure that Title III/V initiatives run smoothly amid growth or change in staff, technology needs, etc. As such, although competitive Title III and V funding serves as one-time funding for institutions and the initiatives they seek to build, funding for these initiatives requires maintenance of funding, especially as their grant period ends.

A leader at AANAPISI 4 highlighted the importance of Title III and V funding, explaining that there's no other source of federal funding with the authorized uses outlined in these titles that will address the long-neglected needs of students of color, students from low-income backgrounds, and the institutions that serve them. Other leaders mentioned that competitive federal Title III/V funds are not enough to cover all Title III and V project costs, including pay for project personnel. A leader

at AANAPISI 2 noted that most of their AANAPISI Title III project personnel is paid for with competitive Title III funds, and the institution supplements what is not covered by program funds — something that was mentioned by almost all the leaders of institutions with enrollment-based MSI designations that we spoke to.

Additionally, in our conversations, MSI leaders shared that, in some cases, the end of an institution's competitive Title III/V grant means the end of a Title III/V project for students and the dismissal of project personnel. A leader at HSI 2 said that, although their institution was able to further support Hispanic students using Title V funds, institutional leaders were ultimately unable to institutionalize the program created with those funds after their Title V grant ended due to a lack of consensus among senior campus leaders on program institutionalization and program costs. This leader said that the institutionalization of projects from competitive Title III and V grants always starts “at the helm of the institution.” Unless an institution's president supports Title III/V project institutionalization, “tying the project to the vision, mission, and values of the institution,” the Title III/V project will not be sustained. This leader also noted that a campuswide understanding of Title III and V project activities — their value, importance, and impact — is crucial to ensuring that senior campus leaders buy in to Title III/V project institutionalization and, more importantly, understand that Title III/V funds are federal funds specifically tailored to meet the needs of students of color and students from low-income backgrounds, and as such serve as catalysts to ensure that institutions that enroll a significant population of students of color don't just enroll them, but intentionally “serve”⁵⁹ these students of color, as Berkeley scholar Gina Garcia argues. The lapse of such Title III and V projects without institutionalization is especially concerning since these federally funded projects offer multiple supports to students, including personnel who work closely with students and develop strong, supportive relationships with them. The end of Title III/V project activities can leave students who previously relied on them distraught and put program personnel who worked closely with students out of a job.

U.S. Department of Education officials confirmed that institutionalization of Title III/V projects is crucial to strengthening MSIs, but should focus on maintaining only effective, evidence-based elements of these projects that have been shown to improve project outcomes for students of color and students from low-income backgrounds based on collected program data. They also recognize that institutionalization largely depends on institutional leaders, and their efforts to sustain Title III/V projects before the end of the grant period.

Our analysis of program selection criteria listed in U.S. Department of Education notices for new competitive Title III/V program applications for fiscal years 2022 and 2021 via the U.S. Federal Register found that all but the HSI STEM and Articulation Program; AANAPISI Title III, Part A and F Programs; and NASNTI Title III, Part A and F Programs include selection criteria for applicants to outline plans for project institutionalization and whether project coordinators/activity directors have direct access to the president or chief executive officer for the purpose of quality project management.

Leaders mentioned that competitive federal Title III/V funds are not enough to cover all Title III and V project costs, including pay for project personnel

Insight 8: Title III Formula Funding Is Crucial for HBCUs and TCCUs, but Insufficient to Cover Their Broader Infrastructure Needs

Institutional leaders at mission-based MSIs (HBCUs and TCCUs) emphasized the importance of Title III formula funding to address the needs of students of color and students from low-income backgrounds at their institutions, while noting that current funding levels do not address larger institutional needs that affect student learning and success in the long term.

Leaders at TCCUs and HBCUs described Title III formula funding as “core operational funding.” A leader at HBCU 2 shared that, as recipients of the Strengthening HBCUs Program and the Strengthening Historically Black Graduate Institutions (HBGI) Program, their institution is able to fund 16 undergraduate academic programs, activities, and certain core functions, including online education, the school library, technology needs, and financial literacy programs for students. This funding also supports multiple graduate academic programs, including the architecture and pharmacy programs and the doctoral program in engineering, among others. A leader at HBCU 3 said that the bulk of their Title III funding goes toward supporting their academic affairs division, and intimated that “without Title III funds, our doors would likely close.” Similarly, a leader at TCCU 2 noted that Title III funds support about half of their institution’s business office and much of the information technology (IT) software and infrastructure used by students and faculty on campus, including major online learning platforms such as Canvas, Empower (their student records management system), and their accounting system. A leader at TCCU 5 also said that Title III is a core funding source for the institution’s IT system.

Data on institutional revenue from federal and state appropriations at HBCUs and TCCUs compared to that at non-MSIs supports these statements from TCCU and HBCU leaders and highlights the importance of Title III funding to these institutions’ operations.⁶⁰ Research on institutional revenue from federal appropriations at TCCUs and public non-TCCUs found that in Academic Year (AY) 2013-14, TCCUs received a significantly higher proportion of their total revenue from federal sources, averaging between 71% to 74% at two- and four-year TCCUs, respectively.⁶¹ In comparison, public non-TCCUs received less than 25% of their revenue from federal sources.⁶² In addition, most states do not fund the operations of TCCUs, unlike other public higher education institutions, because states are not legally obligated to do so, since TCCUs were founded and chartered by tribal nations, and more than 400 treaties between the federal government and tribal nations outline the responsibility of the federal government to ensure the health, welfare, and education of tribal nations, in exchange for land given by tribal nations to the federal government. In other words, the federal government, rather than state governments, has a legal responsibility to provide education to Indigenous communities.⁶³ Research on institutional revenue from state appropriations at TCCUs and public non-TCCUs found that in AY 2013-14, TCCUs received less than 3% of their institutional revenue from state funding sources. In contrast, two- and four-year public non-TCCUs received between 32% to 34%, on average, respectively.⁶⁴

Data on institutional revenue sources at HBCUs tells a similar story. Research on average revenue shares at public nonprofit four-year HBCUs and non-HBCUs in 2015 found that HBCUs rely far more heavily on federal, state, and local funds than non-HBCUs. Fifty-four percent of overall revenue at public four-year HBCUs came from federal, state, and local funding, whereas only 38% of overall revenue at public four-year non-HBCUs came from government sources.⁶⁵

While HBCU and TCCU leaders stressed the importance of Title III formula funding to their respective institutions, they noted that current funding levels are insufficient to fully meet the broader physical and technological infrastructure needs of their institutions. A leader at TCCU 4 said that their institution is in dire need of new academic brick-and-mortar buildings that can withstand the heavy rains and bad weather of the region but their institution lacks the funds to invest in infrastructure. The institution had previously purchased modular buildings, using the limited funds that were available at the time, but these modulares are now old and decayed, and many have quality issues and mold, thanks to the region’s extreme rains.

The institution was recently able to purchase two new modulators with COVID-19 relief funds — something that would have been difficult without those funds. A leader at TCCU 3 said that their institution was able to upgrade its IT infrastructure using COVID-19 funds, but this leader was quick to add that IT infrastructure is an ongoing and ever-evolving campus need. A leader at TCCU 2 said that the drinking water infrastructure system at one of the institution's campuses is in serious need of maintenance, but they haven't been able to address this need on account of limited campus funds. Similarly, a leader at HBCU 4 said that many of their buildings were originally built in the 1960s, while the building this leader's office is in was constructed in 1930. Many of these buildings were in such dire need of maintenance and updates to their air conditioning and filtration systems (many still had the original heat/air and two-pipe boiler systems that were installed when the buildings were erected) that the institution feared it would need to tear them down. But thanks to the COVID-19 funds HBCU 4 received, the institution was able to update the air conditioning and air filtration systems in many of these buildings. Without those funds, however, HBCU 4 would have been unable to update its physical infrastructure.



Policy Recommendations

After considering the above insights from leaders at enrollment-based and mission-based MSIs, our own review and analysis of Title III and V ED programs through an equity lens, and conversations with staff at the U.S. Department of Education, EdTrust developed the following seven administrative and legislative recommendations for the U.S. Department of Education and Congress to improve HEA Title III and V programs, so that Title III/V funds can better support students of color at HBCUs, TCCUs, and MSIs.

Congress should increase annual Title III and V program funding for HBCUs, TCCUs, and MSIs. Funding for HBCUs and TCCUs, which have unique missions, and funding for enrollment-based MSI programs should be based on different considerations.

HBCUs were established with the unique mission of educating Black students amid the enslavement and segregation of Black Americans, while TCCUs were founded by tribal nations to support the self-determination of Indigenous communities. Yet while HBCUs and TCCUs have long played a crucial role in educating Black and Indigenous people, these institutions have been grossly and systematically underfunded from the start. Enrollment-based MSI designations were later established to support the growing number of students of color pursuing a higher education, which is why we argue that increased program funding for enrollment-based MSI designations should be based on different factors — such as institutional diversity (type, size, and location) among enrollment-based MSIs, equity in funding across enrollment-based MSIs, and projected enrollment trends at these institutions — than mission-based MSI designations.

Program funding increases for HBCUs and TCCUs must account for the historic underfunding of these institutions compared to their non-MSI counterparts. As noted earlier, it would take \$12.8 billion to remedy the systemic disinvestment in the nation's 18 public land-grant HBCUs in the South over the past three decades alone.⁶⁶ Moreover, as various HBCU and TCCU leaders noted in this report, HBCUs and TCCUs have vast unaddressed physical and technological infrastructure needs — thanks to decades of underfunding — which must also be addressed through additional program funding to HBCUs and TCCUs. To produce a comprehensive estimate of how much increased funding is needed for formula-funded Title III and V programs, we would urge the U.S. Government Accountability Office (GAO) to assess the cost of the current infrastructure needs of HBCUs and TCCUs, the cost of remedying past and current underinvestment in HBCUs and TCCUs compared to their non-MSI counterparts, what percentage of Title III formula funds for HBCUs and TCCUs and other federal funds for these institutions are used for core expenses, and projected enrollment trends at HBCUs and TCCUs.

We recommend a separate assessment for increased funding to enrollment-based Title III and V programs that includes current infrastructure needs of institutions with enrollment-based MSI designations, and accounts for the diversity of institutional types and resources among institutions with enrollment-based MSI designations and projected enrollment trends at these institutions and other emerging enrollment-based MSIs.

Assessment of current infrastructure needs for mission and enrollment-based MSIs should give special attention to broadband and data systems and lessons learned during the COVID-19 pandemic and should also account for deferred maintenance at these institutions, campus modernization needs to allow these institutions to be more competitive, and the continuing need to meet historical building requirements.⁶⁷ We support Congress' recent investment in bolstering the infrastructure of HBCUs, TCCUs, and MSIs via the [Fiscal Year 2023 HBCU, TCCU, and MSI Research and Development Infrastructure Grant Program](#), which will allow those institutions to improve their physical and technological infrastructure to strengthen their capacity to engage in research. Congress should invest additional funds in the program in the next appropriations cycle and beyond.

In addition, increased competitive Title III and V funding should include funding for one-year planning grants for enrollment-based MSIs that have yet to receive competitive Title III/V funding, as permitted by Sections 313(c) and 504(b) of the Higher Education Act, so that colleges can adequately prepare for the Title III/V application process. Enrollment-based MSIs with the largest percentages of enrolled students receiving federal need-based assistance and with the lowest averages of educational and general expenditures per full-time equivalent undergraduate student should receive preference for these one-year planning grants, since they may have fewer resources and/or less capacity to plan for the application of these federal grants.

The Department of Education should include program selection criteria outlining proposed institutionalization efforts for competitive Title III/V programs that do not currently include them and weigh these criteria more heavily.

To ensure that practices that serve students of color and stem from competitive Title III and V funds are institutionalized before competitive Title III/V grants end, we recommend that the U.S. Department of Education require selection criteria outlining proposed institutionalization efforts for competitive Title III/V programs that currently lack them — namely the HSI STEM and Articulation Program; AANAPISI Title III, Part A and F programs; and NASNTI Title III, Part A and F programs. As mentioned earlier, EdTrust conducted an analysis of program selection criteria listed in U.S. Department of Education notices for new competitive Title III/V program applications for FY 2022 and 2021 via the U.S. Federal Register. We found that all but the HSI STEM and Articulation Program; AANAPISI Title III, Part A and F Programs; and NASNTI Title III, Part A and F programs include selection criteria requiring applicants to outline plans for project institutionalization and whether project coordinators/activity directors have direct access to the president or chief executive officer for the purposes of quality project management.

A review of the FY 2022 notice for new awards for the [Title V, Part A \(Developing HSIs\) Program](#) outlines selection criteria worth five points (out of a total of 110 possible points) under the “(a) Quality of the applicant’s comprehensive development plan” section for institutions that develop a project plan that “clearly and comprehensively describes the methods and resources the institution will use to institutionalize practice and improvements developed under the proposed project, including, in particular, how operational costs for personnel, maintenance, and upgrades of equipment will be paid with institutional resources.” We encourage the Department of Education to weigh these criteria more heavily across all competitive Title III/V programs, ensure that practices and improvements that are institutionalized have produced significant evidence of effectiveness for students of color, and require college presidents and chief financial officers (CFO) to sign off on these criteria. We recommend that the department implement the same measures for the competitive Title III/V programs that currently lack these criteria.

To further encourage collaboration between college presidents, the individuals responsible for drafting program applications for competitive Title III and V programs, and staff executing the Title III/V projects after the funding has been awarded, we also encourage the Department of Education to revise their “quality of evaluation plan” selection criteria for all competitive Title III/V programs. More specifically, we recommend that the department require applicants to clearly and comprehensively describe how project personnel and the individual(s) conducting the project evaluation will annually review data on progress toward achieving activity objectives and goals of the comprehensive development plan with the college president and require the college president to sign off on the plan.

The Department of Education should also require Title III/V grantees to note their progress on this revised “quality of evaluation plan” selection criterion in their federally mandated Annual Performance Reports (APRs). Additionally, we encourage the Department of Education to make APRs, including program data and evaluation outcomes, available to the general public, so members of the public can understand and identify best practices across projects for students of color and students from low-income backgrounds.

The Department of Education should publish information about institutions that receive Title III/V competitive funding eligibility waivers.

The MSI leaders we spoke to questioned whether well-resourced institutions should be eligible for the same competitive MSI funding streams as less well-resourced MSIs. Leaders defined institutions with “more resources” as those that could apply for either/both waivers for the two main eligibility requirements in Titles III and V:

- the requirement that institutions applying for Title III/V funding have a substantial percentage of enrolled of students receiving federal need-based assistance and,
- the requirement that they have a lower average of educational and general expenditures per full-time equivalent undergraduate student than the average educational and general expenditures per full-time equivalent undergraduate student at institutions that offer similar instruction.⁶⁸

In light of the concerns about whether competitive Title III/V funding is equitably serving students of color and students from low-income backgrounds at some institutions with differing levels of resources for these students, we recommend that the Department of Education publish information about waiver requests and approvals — including which higher education institutions submitted waiver requests, which were granted waivers, as well as the criteria under which waiver requests were approved. Sharing this information would help Title III/V grantees and higher education advocates like EdTrust better understand how waiver requests are approved and ensure that competitive Title III/V funds are used to effectively meet the needs of students of color and students from low-income backgrounds.

The Department of Education should provide guidance to competitive Title III/V applicants on how best to include allowable activities that are not explicitly outlined in HEA Titles III and V.

While there are flexible allowable uses for competitive Title III and V funds, the institutional leaders we spoke to expressed an interest in using competitive Title III and V funds for the following activities, which aren't explicitly listed in Titles III and V:

- **Basic-needs support** to assist students facing food and housing insecurity, as well as transportation and child-care needs
- **Emergency aid** to support students who are in need of natural disaster relief and/or facing basic needs insecurity, economic hardship, and unexpected financial expenses, like medical bills and car repairs, that can derail their education
- **Mental-health support**, including counselors, resources, and external partnerships
- **Student-parent needs**, such as child care, transportation, and systems that facilitate flexible scheduling
- **Developmental education**, including corequisite education, supplemental instruction, improving assessment and placement, and other approaches
- **Experiential learning**, such as undergraduate research, internships, practicums, service learning, study abroad, and student teaching

ED officials confirmed that while these allowable uses are not mentioned in HEA, Title III and V funds may be used to support these activities, depending on how Title III/V project proposals are written for consideration by the department. ED also discourages institutions from providing direct aid to students because it's not sustainable for institutions to do so over the long term.

We encourage the department to provide guidance to prospective competitive Title III/V program applicants, so they may better understand how to include these activities in their project proposals.

The Department of Education should provide guidance to all Title III/V grantees about pre-award costs.

MSI leaders highlighted the lag between the time the department disperses annual Title III/V grant funds to institutional recipients (on October 1, per the start of the federal fiscal year) and when institutions begin the academic year (as early as August and runs through May), which can delay grant implementation by as much as a year and significantly decrease the number of students who might benefit from more timely program implementation.

Department of Education officials confirmed that there is a delay between the time the department disperses annual Title III/V grant funds to institutional recipients and when institutions begin their operations. They noted that department regulations allow ED to approve pre-award costs — i.e., costs incurred prior to receiving Title III/V funding — so that institutions can start paying for program costs 90 days before they receive annual Title III/V funding on October 1.

We encourage ED to provide guidance to all Title III/V grantees about how to get pre-award cost approval. And, when possible under current law, the department should disperse Title III and V funds to recipients before the start of an institution's academic year to allow practitioners to more seamlessly and confidently provide program services and supports to students, and in turn, allow more students to benefit from such programs. Additionally, Congress should consider reforms to Titles III and V to facilitate earlier dispersal of these funds.



The Department of Education should provide additional specialized technical assistance to competitive Title III and V funding recipients to better leverage Title III/V funding for students of color.

Given this interest, we recommend that the Department of Education, in partnership with the Institute of Education Sciences (IES), MSI associations such as the Alliance for Hispanic Serving Institution Educators (AHSIE), and MSI researchers such as Berkeley scholar Gina Garcia, Robert Teranishi, a professor of social science and comparative education at the University of California, Los Angeles, and Mike Hoa Nguyen, an assistant professor of education at New York University, create a mandated training program for Title III and V funding recipients. This training program would help institutions improve the operation and success of Title III and V projects, and ensure that competitive Title III and V grants produce equitable outcomes for students of color and ensure the holistic success of these students during and after college by centering racial identity, equity, and [consciousness](#). Congress should appropriate federal funds for the creation of such training.

Priorities for this training program should include the following to leverage funding for improving outcomes for students of color at recipient institutions:

Project Management and Leadership Development for Title III/V Program Implementation

- Evidence-based Title III/V program evaluation, recordkeeping, and reporting student/project performance
 - Program evaluation guidance mirroring What Works Clearinghouse (WWC) standards
- Budget management and statutory/regulatory requirements
- Hiring, training, and retaining Title III/V project personnel
- Preparing Interim Performance Reports (IPRs) and Annual Performance Reports (APRs)
- Preparing for U.S. Department of Education site visits
- Title III/V project pathways toward institutionalization and mobilization of campus communities toward institutionalization
- Coordinating project management and communication for cooperative Title III/V projects

Capitalizing on Title III/V Projects to Ensure the Success of Students of Color at Higher Education Institutions

- Recruiting and serving students of color
 - Best practices for recruiting students of color to participate in Title III/V projects
 - Crafting culturally responsive project materials and curricula
- Using Title III/V projects to launch institutional transformation for students of color
 - Using Title III/V projects for institutional transformation in service of students of color (prioritizing college access, retention, and success for students of color)
 - Defining servingness; building an institutional MSI identity

In the suggested training provided on Title III/V program evaluation, the Department of Education can encourage institutions to work with individuals from their campus institutional research office or college of education, or individuals outside their institution who understand the purposes of Titles III and V and can conduct a program evaluation.

The Department of Education, White House Initiatives, and all federal agencies with MSI funding opportunities should increase efforts to help higher education institutions learn about and apply for additional federal MSI funding outside of HEA Titles III and V.

MSI leaders noted that while Titles III and V offer significant federal funding opportunities for MSIs, other federal agencies — including the U.S. Department of Health and Human Services, National Science Foundation, Department of Agriculture, Department of Defense, and more — also provide funding opportunities for MSIs.⁶⁹ While the Department of Education's [White House Initiatives](#) help amplify other federal funding opportunities for MSIs, it is crucial that all MSI leaders be made more aware of the vast array of federal funding opportunities for MSIs beyond the Department of Education and how to apply for them — especially given the vast number of federal resources that go to predominantly white institutions. The department should increase efforts to refer MSIs to other federal agencies with funding opportunities. While some federal agencies currently provide direct technical assistance to MSIs on applying for federal funding opportunities within these agencies, we recommend that all agencies do more to help MSIs successfully secure funding, so students at HBCUs, TCCUs, and MSIs can receive more robust support.

Appendix

Interview Protocol

Questions:

1. What were the top needs of students at your institution before the pandemic? What are their top needs today?
2. What are the top needs of your institution?
3. Can you describe some of your institution's uses of Title III/V funds?
 - a. What does the sustainability of Title III-/V-funded projects at your institution look like?
 - b. [If necessary] Does your institution use Title III/V funds to address unmet needs (such as in facilities, student services, academic programs, etc.) or new initiatives?
4. As you know, allowable uses for Title III/V funding include academic supports; faculty development; facilities, equipment, and technology; strengthening the institution's fiscal health; and other activities to support an institution's ability to serve students of color and students from low-income backgrounds. Do you think that the currently allowed uses are appropriate to address the current needs of students at your institution and the needs of your institution?
5. How would you describe the state of your institution's infrastructure, both physical, such as facilities, and digital, such as broadband? What are your institution's most pressing infrastructure needs?
 - a. [If necessary] Can you describe the extent of deferred maintenance on your campus? Has your campus recently constructed any new facilities?
6. How does Title III/V funding fit into your institution's broader funding strategy?
7. What limitations are there on the use of your institution's Title III/V funds? How could federal funds — including Title III/V, as well as other federal funding streams — better serve students of color and students from low-income backgrounds?
8. Is there anything else you'd like to share with us? Is there anyone else we should talk to at your institution or another institution for our project?



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EdTrust is committed to advancing policies and practices to dismantle the racial and economic barriers embedded in the American education system. Through our research and advocacy, EdTrust improves equity in education from preschool through college, engages diverse communities dedicated to education equity and justice and increases political and public will to build an education system where students will thrive.

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