

An Analysis of Title III Funding in Support of Native American-Serving Nontribal Institutions' Strengthening of American Indian/Alaska Native Postsecondary Attainment

Native American-Serving Nontribal Institutions (NASNTIs) play a vital role in meeting the educational needs of American Indian/Alaska Native (AI/AN) students throughout the country. The U.S. Department of Education's Title III grants provide essential competitive funding opportunities for NASNTIs to develop institutional capacities and strategies to implement sustainable student support systems, academic programming, vital technology, and capital improvements.

The importance of the Title III grants for two- and four-year institutions serving this population of students cannot be overstated and continues to escalate. AI/AN students are underserved and largely invisible in higher education policy and programming. Despite increasing AI/AN student enrollment in postsecondary institutions, they are the least likely student group to earn a bachelor's degree.¹ Across the United States, 43 percent of all adults have obtained an associate degree or higher, in contrast to 25 percent of AI/AN adults. These data suggest that higher education systems and policies are failing to foster sufficient access and success for AI/AN students and raise questions about what additional policies, investments, and programs are needed.

Over the past three years, the Western Interstate Commission for Higher Education (WICHE) has worked directly with NASNTIs through a Lumina Foundation funded project, *Reducing the Postsecondary Attainment Gap for American Indians and Alaska Natives: Linking Policy and Practice*. The goal of the initiative is to engage NASNTIs in a new consortium through networking and engagement strategies to support their efforts to increase American Indian/Alaska Native students' attainment rates and to formulate collective strategies to drive supportive policy implementation at the state and federal levels.

Key Findings

- Native American-Serving Nontribal Institutions have a deep commitment to American Indian/Alaska Native student academic success that is evident in special programming interventions and student support initiatives .
- These efforts are largely funded through U.S. Department of Education Title III funding, which is a vital financial resource to NASNTIs.
- Support of academic success is rooted in recognition of unique cultures and experiences of American Indian/Alaska Native students.
- Increases in American Indian/Alaska Native student retention and graduation rates are associated with factors such as student belongingness, cultural engagement, and cultural awareness opportunities in student support services and academic programs.

The purpose of the study was threefold: 1) to highlight the methods that NASNTIs used to implement grant activities to enhance institutional capacity and educational opportunities for American Indian/Alaska Native and low-income students through the lens of the legislation's permissible activities under Title III; 2) to analyze grant activities for key themes across all projects; and, 3) to track dollars spent across each legislatively allowable activity for each reporting year. WICHE staff also reviewed national data about the current status of AI/AN students overall in higher education and compared it to NASNTIs data related to performance measures described in the Title III legislation related to

enrollment, retention, graduation rates. The findings hold lessons for other institutions, and indicate continuing policy and programmatic needs to be addressed to support AI/AN students.

Designation of NASNTIs and Title III Funding

Background

NASNTIs are a federally designated type of Minority Serving Institution (MSI) established as part of the Higher Education Opportunity Act of 2008. The legislation authorizes competitive federal grant funding based on an eligibility criterion for institutions with an undergraduate enrollment population that is at least 10 percent AI/AN students and being qualified to receive Title III funds. Title III eligibility requires that at least 50 percent of an institution's degree-seeking students receive need-based assistance under Title IV of the Higher Education Act, or a substantial number of enrolled students receive Pell Grants, and the institution has low educational and general expenditures per low-income student in comparison to the national average.

Currently, 39 mostly public two- and four-year institutions of higher education have qualified as NASNTIs and collectively educate nearly 15,000 AI/AN undergraduate, which is about 13 percent of the nation's AI/AN undergraduates.² NASNTIs are located across the United States. They are mostly adjacent to American Indian reservations and are often the institution of choice for many Native American students who wish to remain close to their home communities. NASNTIs are currently located in 11 states, including Alaska, Arizona, Colorado, Minnesota, Montana, New Mexico, North Carolina, Oklahoma, Utah, Washington, and Wyoming.

Overview of Title III Funding

Unlike other designated MSIs, such as Historically Black Colleges and Universities (HBCUs) and Tribal Colleges and Universities (TCUs), that are codified in federal legislation, NASNTIs are not. Instead, an institution receives NASNTI designation when it achieves a 10 percent threshold of AI/AN undergraduate student enrollment and is classified as a Title III institution.³ Since federal recognition is established by percent enrolled, the determination of which institutions are NASNTIs can fluctuate over time, depending on shifts in overall enrollment patterns.

In response to request for proposals, eligible institutions can propose and submit five-year projects to plan, develop, and implement activities that strengthen the institution in four broad areas: academic quality, student

support services, institutional management, and fiscal stability. Below in Table 1 are the authorized activities allowable under Title III.

The legislative intent of the NASNTI Title III program is to provide grants and related assistance to Native American-Serving Nontribal Institutions to enable them to *“improve and expand their capacity to serve Native Americans and low-income individuals.”*⁴

Table 1. Authorized Activities under Title III

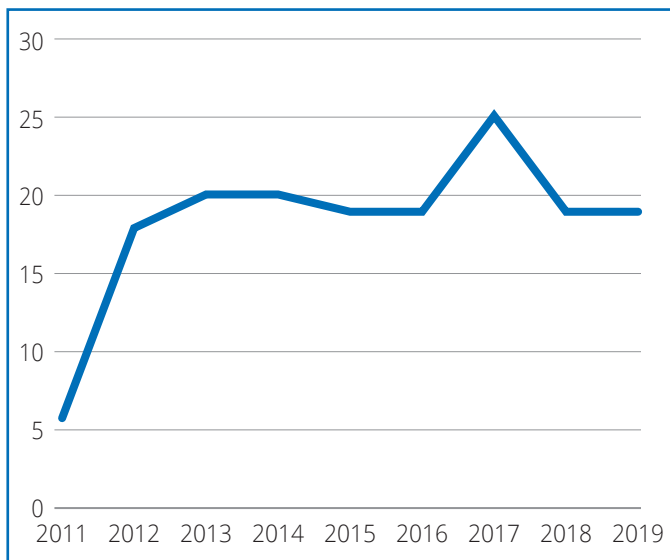
Purchase, rental, or lease of scientific or laboratory equipment for educational purposes, including instructional and research purposes
Renovation and improvement in classroom, library, laboratory, and other instructional facilities
Support of faculty exchanges, and faculty development and faculty fellowships to assist faculty in attaining advanced degrees in the faculty's field of instruction
Curriculum development and academic instruction
Purchase of library books, periodicals, microfilm, and other educational materials
Funds and administrative management and acquisition of equipment for use in strengthening funds management
Joint use of facilities such as laboratories and libraries
Academic tutoring and counseling programs and student support services
Education or counseling services designed to improve the financial and economic literacy of students or the students' families

Title III funding is competitive and supports institutional capacity building and enhancement of academic programs for low income and AI/AN students. It is the only targeted source of federal support expressly intended to increase institutional capacity to improve AI/AN student academic attainment for NASNTIs. The importance of these funds cannot be overstated since, by definition, eligible institutions serve financially disadvantaged student populations and financially

disadvantaged institutions. There are two types of discretionary grants awarded under this program: individual development grants and cooperative arrangement development grants ranging from \$200,000 to \$400,000 per year. As their name suggests, the latter grant category supports collaborations with another NASNTI or non-NASNTI to encourage resource sharing and avoid duplicative efforts.

Figure 1 shows that from 2011 to 2019 the number of Title III awards to NASNTIs increased 68 percent from six to 19 grants, to a total of 25 unique institutions. The federal funding allocation for NASNTIs from inception under the reauthorization of the Higher Education Act of 2008 is approximately \$5 million annually. This amount has not been adjusted over time to accommodate an increased number of qualifying institutions.

Figure 1. Number of NASNTI Proposals Funded from 2011-2019



NASNTIs tend to be excluded from other federal initiatives focusing on MSIs, such as those supported by the National Science Foundation and National Institutes of Health, due to a lack of understating about NASNTIs and their role in the MSI ecosystem. Historically Black Colleges and Universities (HBCUs) and Tribal Colleges and Universities (TCUs) are codified in federal legislation and are not based on percent enrolled of the minority student body or financial factors. Title III is the only designated federal funding for NASNTIs. In the recent Coronavirus, Aid, Relief, and Economic Security (CARES) Act, NASNTIs were eligible for less than 1 percent (.06) or \$6 million of the MSI allocation of these funds.⁵ This allocation was small relative to other groups of MSIs with similar numbers of member institutions (34) and

combined enrollments (approximately 12,000) with distributions that ranged between \$25 million and \$50 million. In addition to the discretionary funding, MSIs are eligible for other federal funding that encourages diversity in the workforce, particularly in the scientific workforce. There is a lack of consistency among the federal agencies in regard to including NASNTIs in the set of MSIs that are encouraged or in some cases are eligible to apply for federal funds, similar to Hispanic Serving Institutions (HSIs), HBCUs, Asian American Native American Pacific Islander Serving Institutions (AANAPISIs), and TCUs that are the more common set of MSIs noted among the federal agencies. This lack of recognition results in inequitable funding appropriations for this group of institutions.

NASNTIs play a vital role in the education of AI/AN students, both in terms of the number of students that enroll and graduate from these institutions, but also for the development of institutional practices that support the educational advancement of AI/AN undergraduates. As reflected in their Title IV and Title III eligibility, NASNTIs are under-resourced institutions serving a high proportion of historically underserved students in higher education. Understanding how these institutions have used the funding they have secured under Title III provides some insight into their priorities, needs, and strategies for improving AI/AN student success into the future.

Analysis Goals and Design

NASNTI Title III Annual Report Document Review

In fall 2019, WICHE staff submitted a Freedom of Information Act (FOIA) request through the U.S. Department of Education to receive all Title III annual progress reports for NASNTIs awards. The purpose of this analysis is to highlight the methods that NASNTIs used Title III funding to implement grant activities to enhance institutional capacity and educational opportunities for American Indian/Alaska Native and low-income students.

In September 2020, WICHE received 166 annual reports across 46 projects at 25 institutions between 2011 and 2019. Since these are annual reports of multiyear awards, some projects are still ongoing and the reports submitted do not include all of their grant-supported years. In addition, one institution's annual report was removed from this analysis because it lacked sufficient detail. The 24 remaining institutions became the "NASNTI set" used in the data analysis to contextualize the demographic characteristics of these institutions and their grant-supported accomplishments.

NASNTI Two-Year Institutions

Name	Location
Carl Albert State College	Poteau, OK
Connors State College	Warner, OK
Eastern Oklahoma State College	Wilburton, OK
Murray State College	Tishomingo, OK
Navajo County Community College	Holbrook, AZ
New Mexico State University, Grants	Grants, NM
Northern Oklahoma College	Tonkawa, OK
Redlands Community College	El Reno, OK
Robeson Community College	Lumberton, NC
San Juan College	Farmington, NM
Seminole State College	Seminole, OK

NASNTI Four-Year Institutions

Name	Location
East Central Oklahoma University	Ada, OK
Fort Lewis College	Durango, CO
Heritage University	Toppenish, WA
Montana State University, Northern	Havre, MT
Northeastern State University	Tahlequah, OK
Northeastern Oklahoma A&M College	Miami, OK
Southeastern Oklahoma State University	Durant, OK
University of Minnesota, Morris	Morris, MN
University of Alaska, Anchorage (Kodiak College)	Anchorage, AK
University of Alaska, Fairbanks	Fairbanks, AK
University of North Carolina, Pembroke	Pembroke, NC
University of Oklahoma Science and Arts	Chickasha, OK
Utah State University, Blanding	Blanding, UT

As WICHE conducted its content analysis, staff reviewed each institution's annual reports and documented the primary goal and key grant-supported activities described in the reports. Three research questions guided this analysis, which were:

1. What are the key grant activities undertaken by NASNTIs?
2. How do NASNTI grant activities connect with legislative intent (academic quality, student services, institutional management, fiscal stability)?
3. How are NASNTI funds used to support Legislative Allowable Activities?

Each NASNTI's activities were organized into broad categories of academic quality, student support, institutional management, and fiscal stability – the four focus areas outlined in the Title III reporting framework. The subsequent categorical coding was WICHE's interpretation of how reported grant activities represented the legislative intent of Title III. The coding of these activities and themes discussed in this analysis incorporate the terminology used by institutions in their annual progress reports. In addition to documenting the reported grant activities, WICHE staff also recorded the annual dollars spent in each grant activity that were documented in each institution's annual report. Institutions are required to disclose these expenditures in their Title III annual reports.

Throughout WICHE's analysis, a focus was placed on identifying ways that institutions utilized aspects of cultural engagement and awareness to amplify their existing retention and persistence strategies and practices. The rationale for reviewing the reports through this lens was to increase understanding of the role of cultural responsiveness in AI/AN student attainment at NASNTIs, which can contribute to best practices for AI/AN students in higher education more broadly.

Institutional Data Review

To supplement the review of Title III annual reports, WICHE staff compiled descriptive data about enrollments and expenditures from each NASNTI that received a grant during the period of analysis. The intent was to contribute additional information regarding the current status of support for AI/AN students in higher education, compare NASNTIs to general higher education trends, and to focus on the performance measures laid out in the legislation related to enrollments, retention, and graduation. Although data were drawn from annual reports, some were incomplete or inconsistent across years to be able to generate a cohesive set of data.

This report excludes any institutions that received a NASNTI award outside of the years of our analysis (2011 – 2019). Due to the nature of NASNTI eligibility based on undergraduate enrollment and other institution factors, the list of active NASNTIs has potential to fluctuate after grants are awarded.

The set of NASNTIs that received a Title III grant between 2011 and 2019 consists of 11 public two-year and 13 public four-year institutions that collectively educate about 11 percent of the nation’s AI/AN undergraduates. Additionally, these NASNTIs enrolled significantly larger populations of AI/AN undergraduates compared to non-NASNTIs. For example, in 2019, 17.4 percent of undergraduates attending a NASNTI identified as AI/AN compared to less than 1 percent of student populations at non-NASNTIs.⁶

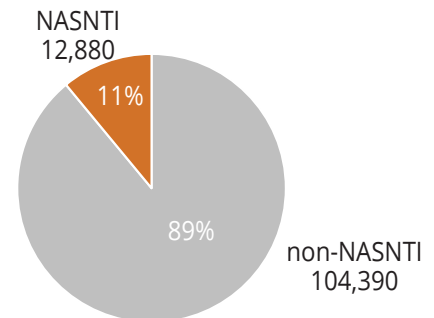
As is the case across MSIs, Title III eligibility is contingent on financial factors, such as core expenditures per student. This analyzed set of NASNTIs report, on average, lower levels of expenditures per student than non-NASNTIs. In 2018, the 24 NASNTIs spent on average \$27,553 per Full Time Equivalent (FTE) enrollment, which was about 67 percent of average expenditures per FTE at non-NASNTIs.⁷ In addition, since most NASNTIs are public institutions, including mostly regional comprehensive four-year institutions and community colleges, they are likely to be impacted by fluctuating state support and to lack the additional revenue streams that exist at larger, more well-resourced institutions. Title III funding therefore serves as a key funding opportunity for these institutions to improve their capacity to support AI/AN students that may not otherwise be available under constrained fiscal environments.

Analysis of Title III Grant Reports/ Findings

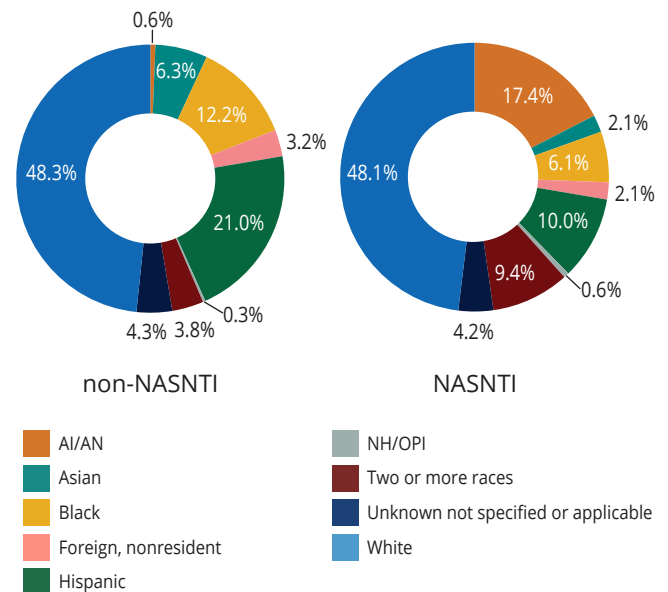
Analysis of grant reports show that institutions typically centered their Title III NASNTI grant projects on a single goal of increasing AI/AN attainment through targeted grant activities spanning the four focus areas of the Title III program. Although not a specific requirement of the funding, intentional efforts to increase cultural awareness and engagement are apparent in nearly every facet of the reported projects, including academic programs, professional development, student support activities, and culturally relevant pedagogy. The following sections provide more detail about the activities pursued by the NASNTIs to achieve the goals of the projects.

Profile of Native American-Serving Nontribal Institutions

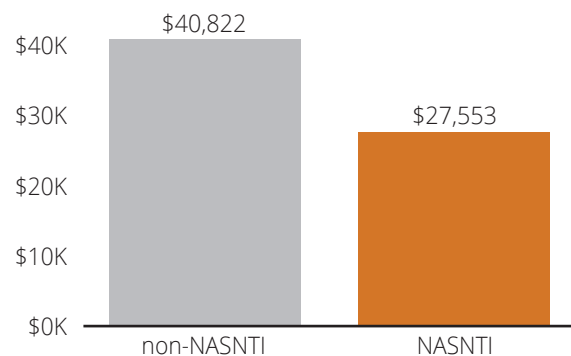
Number and Percent of AI/AN Undergraduates Enrolled by NASNTI Status, Fall 2019



Share of Undergraduate Enrollments by Race/Ethnicity, Fall 2019



Expenditures per FTE, FY 2018



Title III Grant Project Goals

The goals of individual NASNTI projects reflected with the overall Title III program goal of “increasing institutional capacity to serve American Indian/Alaska Natives and low-income students.” Institutions pursued grant projects designed to meet the unique needs of their institution and/or students. For example, several institutions focused on very specific academic programs, such as STEM majors or nursing programs. Other institutions opted to focus on developing their curriculum to better serve and support their AI/AN students, particularly in areas of developing a culturally relevant curriculum and distance education. Another subset of institutions opted to focus on the co-curricular components of a student’s education through the bolstering of student support services that are intended to improve academic outcomes and enhance a sense of belonging, such as focused mentoring, tutoring, and advising. Lastly, some institutions stated broad goals, such as “increasing attainment for AI/AN students” or “eliminating attainment gaps.” These institutions often undertook a multi-pronged approach to their grant activities that targeted specific aspects of their operations as a mechanism for advancing their broad project goal.

Key Grant Activities

WICHE staff used the four focus areas of Title III grants outlined in the funding opportunity – academic quality, student support services, institutional management, and fiscal stability – as a framework to identify how institutions proposed and pursued their grant activities. It is important to reassert that NASNTI grants are complex, multiyear projects that require ongoing monitoring and reporting.

Academic Quality

Within the area of academic quality, institutions incorporated a range of grant activities that focused on curriculum development, the enhancement of specific components of academic programming and curriculum, and/or development of new academic offerings that addressed specific student-focused activities, such as language preservation and guided pathways.

Curriculum Development

Institutions that engaged in activities focused on curriculum development included both the creation of new academic programs and culturally appropriate enhancements made to existing curriculum offerings. For example, several institutions used Title III funding to establish a new program in a high- need content area that correlates to regional or tribal workforce needs and

included new programs in areas such as agriculture, nursing, or computer engineering. More often, institutions used grant funds to redesign courses to focus on specific curriculum development in the areas of cultural relevancy, distance education, or developmental education to increase and/or diversify academic course offerings with culturally relevant curriculum.

Culturally Relevant Curriculum Development

An emerging body of research indicates that advancing the educational attainment of AI/AN students requires higher education institutions to develop and implement student success strategies that reflect the unique cultures and identities of AI/AN students and incorporate targeted engagement of both AI/AN students and their communities.⁸ Multiple institutions undertook grant activities that incorporated culturally relevant curriculum into existing course offerings through a variety of methods. For example, one institution focused more broadly on advancing a sense of belonging for students in the classroom and did so by offering faculty stipends to redesign courses through increased use of culturally appropriate pedagogy. Other institutions opted to focus on content areas, such as nursing, that enrolled large numbers of their AI/AN students and used grant dollars to develop curriculum strategies such as incorporating culturally sensitive instructional practices into their teaching and developing new elective courses focused on health issues prevalent among the AI/AN population. Another institution developed a culturally relevant curriculum designed to connect students with each other, their culture, and their natural environment by developing courses that included language learning opportunities, Indigenous arts and crafts, place-based STEM, and Indigenous pedagogy within the course context. Yet another institution engaged an outside expert to develop general education courses across three disciplines based on “Native Ways of Knowing” pedagogy.⁹ Other examples of developing a culturally relevant curriculum were combined with undergraduate research opportunities. This included offering research-focused curriculum in areas of ethnography, oral histories, and inquiry-based practices that were intended to support a student’s engagement with their own culture and history.

Distance Education/Remote Learning

Some institutions developed curriculum designed for distance delivery of courses. Their focus on distance education stems from their geographical context, as they addressed the need to better support their more physically remote students, including many AI/AN students residing within their service regions. Some

institutions enhanced distance education by supporting distance education opportunities with Quality Matters, an internationally recognized program that provides a peer-review process for quality assurance of online courses. Other institutions enhanced remote learning opportunities in a specific program. For example, one institution developed distance-learning opportunities that include 2+2 transfer pathways with four-year institutions within their athletic training associate program. Lastly, some institutions invested resources in their technology infrastructure and classrooms to more effectively offer distance education. An example of these efforts is an institution that chose to focus on the remote communities they serve through the development of teaching centers on campus that allow for broad dissemination of courses throughout the isolated areas of their service region. It is also important to point out that while the bulk of activities for these projects focused on online course delivery, some institutions also enhanced student support services in the areas of online tutoring and mentoring to parallel efforts with online courses.

Developmental Education

Recognizing the impediments developmental education frequently creates for completion of an undergraduate credential or degree, a few of the two-year institutions utilized grant funds to redesign developmental education offerings to better support completion goals. These strategies included changing placement models, piloting co-requisite models, developing cohort-learning models for students needing remediation, and creating student success courses to supplement other educational offerings.

Language Preservation

As NASNTIs, these institutions typically serve students within their respective service region, which may include one or more Tribal nations. It became apparent that several campuses have long-standing relationships with one or more tribes. Many incorporated activities that focus on language preservation, which has been found within the Tribal College setting to support cultural identity and belonging for students.¹⁰ These activities include regular tutoring, immersive learning sessions, or offering Native language courses. There was also some crossover between language preservation and undergraduate research opportunities for students. For example, a couple of institutions used grant dollars to support the development of a digital humanities lab to support undergraduate research in the area of language preservation and digital storytelling.

Pathways

A key focus of the Title III NASNTI program is to advance AI/AN student outcomes, particularly in relation to their retention and graduation. One way in which NASNTIs used their grant funding to support AI/AN student attainment was by identifying pathways that would provide students a streamlined track to a degree through transfer pathways. Some of the two-year institutions established partnerships with nearby four-year institutions and formalized Memoranda of Understanding (MOUs) and 2+2 programs. From the four-year viewpoint, this included supporting transfer students into the institution through targeted outreach and mentoring opportunities.

Another way in which institutions supported AI/AN students was through specific programming focused on key transitional points within their academic journeys. For example, multiple institutions developed “Summer Bridge” programs for AI/AN students transitioning into college. Other institutions established first-year experiences or first-year cohorts for AI/AN students to help them develop peer connections and to provide targeted support at the most critical transitional points for a student.

Student Support Services

Student support services were found to be the most commonly incorporated area for NASNTI grant activities and often included a suite of co-curricular activities that engage students in and out of the classroom to increase attainment goals. Ultimately, most institutions included some aspect of co-curricular activities. However, for the purpose of this analysis, there was a particular focus on identifying ways that institutions included specific aspects of cultural engagement and awareness to amplify existing retention and persistence strategies and practices.

Cultural Engagement

Existing research on effective ways to support AI/AN students highlights the need to incorporate components of family and community into student services in a manner that reflects a student’s cultural identity.¹¹ Across NASNTI projects, institutions focused on offering a range of cultural engagement opportunities that support a student’s sense of belonging within the campus environment. This broad categorization of activities includes the staffing and development of dedicated spaces on campuses, such as AI/AN student success centers that provide a centralized place for AI/AN students to come together, engage in activities, and provide a ‘home away from home’ space. Research suggests that these centralized hubs for AI/AN students

yield positive outcomes and serve as a source for advancing student success.¹² Another common example of ways that institutions offered cultural engagement opportunities was with workshops and speaker series to bring Indigenous scholars or elders onto campus. Cultural activities taking place outside of the classroom setting were also common, such as pow wows and art showcases, that served as an opportunity for AI/AN students to celebrate their culture and also as an opportunity to celebrate various AI/AN cultures in a large campus-wide setting.

It is also important to note that traditional retention strategies were encompassed within the grant programming, such as tutoring, mentoring, and advising. However, many institutions specifically incorporated cultural relevancy within these practices in a manner that was reflective of student experience and cultures. Additional research by WICHE ([NASNTI Exemplars Report](#)¹³) underscores the importance of recognizing the unique cultures and experiences of AI/AN students as a way to amplify high-impact practices on campus in a manner that engages AI/AN students and supports their ability to succeed within their institutional environments.

Tutoring, Mentoring, and Advising

Tutoring, mentoring, and advising were among the most commonly included components of grant activities. Although they were typically not the sole focus of a project, these strategies provided a supplemental support structure to increase degree completion. A common example was the development of new courses or majors in STEM fields that included tutoring opportunities for students enrolled in these courses as a means to provide additional access points to support services within the institution. Other institutions developed tutoring programs more broadly through their grant programming through peer and professional tutoring services in areas of study skills, test taking, and specific course materials.

Research finds that structured mentoring opportunities for AI/AN students play a significant role in student success and help students overcome barriers to completion, and a large number of NASNTIs used grant funding to offer mentoring for their AI/AN students.¹⁴ Similar to tutoring and advising, these mentoring programs were often established as a supplement to other grant activities, such as creating a cohort mentoring model for students of a specific major or program. Several institutions facilitated peer-to-peer mentoring programs to enhance students' sense of belonging on campus. In addition to these student mentoring opportunities, some institutions included members of the community in their mentoring programs

through facilitated elder mentoring or professional mentoring programs.

Advising serves an important role in student success by helping students navigate degree maps and time to completion at postsecondary institutions. There are many reported benefits of formal and informal advising for AI/AN students.¹⁵ Within the context of Title III grants, advising was often a component of the services of an institution's centralized AI/AN student success center services. Several institutions highlighted the focus on culturally inclusive advising practices and the need for professional development for faculty and staff advisors to best support AI/AN students. Lastly, some institutions focused on specific subjects for advising, such as financial literacy and career services. These are important, if often overlooked, approaches to student support services since they look beyond graduation as the metric of success for a student and instead focus on the long-term outcomes of students entering into a workforce.

Institutional Management

The development of processes, staffing, and resources plays a critical role in an institution's ability to serve AI/AN students. The NASNTI grant activities identified within the scope of institutional management focused on the ways in which institutions utilized Title III funding in a manner that enhanced staffing, resources, and physical infrastructure to complement and expand other grant efforts to support AI/AN students.

Professional Development

Recognizing the critical role that faculty and staff play in student success, most institutions incorporated professional development into their grant activities.¹⁶ These opportunities were among the most cited activities in grant reports and the range of opportunities reflected the variety of the projects themselves. Professional development was used as a tool to encourage faculty and staff to adopt culturally relevant pedagogy and offer culturally relevant student support services, such as advising and mentoring. For example, as institutions engaged in curriculum development for new academic programs, they incorporated academic strategies to increase culturally relevant pedagogical practices.

Data Systems and Software

The ability of an institution to support AI/AN students through evidence-based practices was demonstrated by the large number of institutions that developed data infrastructure to better understand student outcomes and inform decision-making. The use of data and analytic software was a common thread throughout projects and highlighted how institutions were seeking to improve

services offered to AI/AN students in a targeted manner that would support student outcomes. The software purchased through the grant activities included early alert systems as way to support students earlier in their academic career and identify student support services that would most benefit students as well as student management software programs that were used to more efficiently support student progression from admission to graduation.

Renovations/Purchasing

As found through this analysis, NASNTI projects are dedicated to supporting AI/AN students through a range of student-focused projects, but within those projects there are additional resources that must be purchased or renovated in order to carry out the goals of the project. For example, as some institutions focused on developing a distance learning environment that would expand opportunities within their communities, there was a need to dedicate resources to enhance the technology infrastructure within the campus environment and the community. Additionally, as institutions established tutoring and mentoring programs to support students there was a need for dedicated space on campus for these activities, which required several institutions to renovate current spaces or re-dedicate existing space to provide a physical location for AI/AN students to convene and take part in student services. Other institutions used funds to improve laboratory and library facilities for new STEM majors, such as nursing and computer engineering that require modern instrumentation and labs, as well educational resource materials for libraries to complement new courses and research needs.

Tribal Partnerships and Community Outreach

Research suggests that maintaining a connection to family and tribal communities is a significant factor attributed to AI/AN student success, and structured institutional strategies and systems are needed to facilitate this connection.¹⁷ In practice, through grant activities, institutions included their Tribal partners in many different capacities. While some institutions focused on broader partnership and relationship building through tribal liaison roles and committees, other institutions focused on establishing MOUs to support research partnerships that can foster expanded educational opportunities. Additionally, other institutions expanded their community outreach, by focusing on potential students through youth outreach programs, campus visits, and dual credit opportunities.

Fiscal Stability

A key component of building institutional capacity to serve AI/AN students is ensuring that institutions are well positioned fiscally to ensure institutional strength and continued ability to provide high-quality education opportunities. Through the analysis of grant-supported activities, it became apparent that while the institutions rarely explicitly mentioned fiscal stability, it was central to all activities conducted by these institutions for ultimately benefiting the students. For example, central to goals laid out by institutions in their work within the Title III grant, most institutions offered some variation of “improving outcomes for AI/AN students” or “reducing time to degree for AI/AN students” or “offering guided pathways to degree completion.” All of these reflect a desire on the institutions’ part to increase student retention, which relates to sustaining enrollment and long-term fiscal stability.

Within the academic quality focus area, institutions concentrated on high-demand programs that meet specific workforce needs within their community that will be supported by increased enrollment. The focus on distance education and development of new academic programs represents an institutional shift to meet the workforce needs of their service region. It is through this multifaceted instructional approach that institutions could provide additional educational opportunities for AI/AN students beyond the traditional classroom setting and meet regional workforce needs.

In terms of student support services, most institutions implemented retention strategies that will support the AI/AN students that are already enrolled on their campus, rather than focusing on shifting resources to access and recruitment strategies that will increase enrollment. It also demonstrates the institutions commitment to supporting their AI/AN students who are enrolled, which better positions their institutions to serve additional AI/AN students in the future. This emphasis on retention highlights the cost/benefits of focusing on retaining students already enrolled rather than expending resources on recruiting new students. This exemplifies the care and commitment of these institutions to the AI/AN students they serve.

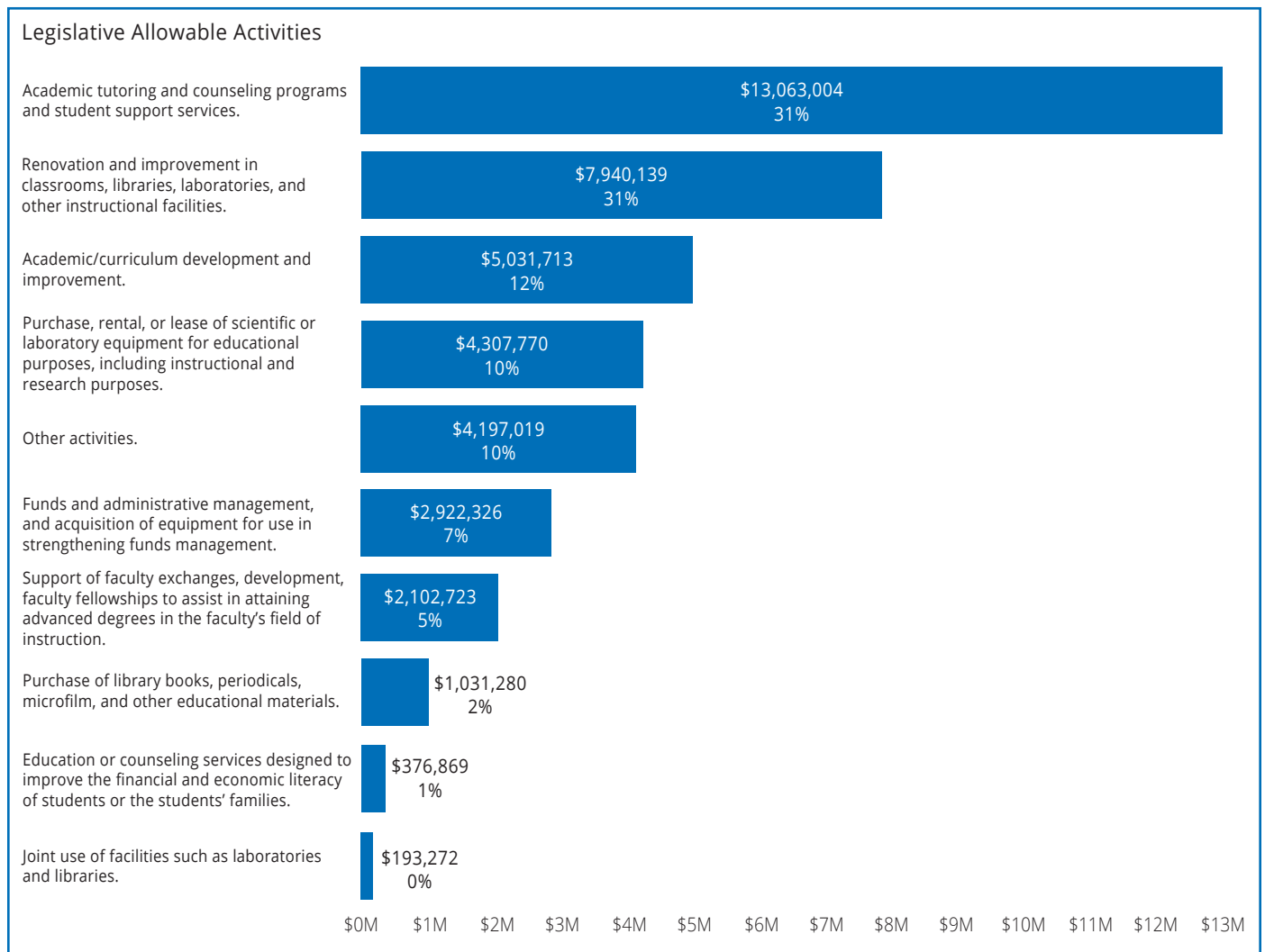
Lastly, the activities discussed within the focus area of institutional management go hand-in-hand with fiscal stability, as these activities highlighted the ways that institutions put resources into the staffing and infrastructure of their institutions in a manner that would advance long-term support of AI/AN students beyond NASNTI grants. While Title III NASNTI grants provide significant financial resources, in terms of overall institutional budgets, they are relatively small dollars to

carry out critical work on campuses. It is essential for institutions to utilize the federal grants to develop the appropriate infrastructure that is going to be sustainable to continue to advance AI/AN student support and outcomes beyond the life cycle of their NASNTI grants. Using funds for technology and data infrastructure, faculty and staff development, and renovations are examples of necessary first steps of creating long-term, sustainable outcomes for AI/AN students.

In summary, through the review of grant activities, it was found that while institutions used a common suite of programming – professional development, curriculum development, tutoring and direct student support, and purchasing of relevant software, research instrumentation, and library materials – the manner in

which they implemented their NASNTI Title III grants reflected the unique needs and environments of the institutions. For many institutions, this was recognized through the direct connection to their institution’s mission, and particularly their mission to support AI/AN students and communities. The enrollment of AI/AN students serves as the key eligibility factor of NASNTI grants, but it is important to note that there are lengthy historical contexts among NASNTIs and their role of educating AI/AN students that extend beyond NASNTI grants. These institutions have a deep commitment to serving AI/AN students, and the NASNTI grants offered one additional avenue for them to carry out this commitment to advancing AI/AN student educational opportunities.

Figure 2. Dollars Spent and Distribution of Funds by Legislative Allowable Activity at NASNTIs, 2011 to 2019



Overview of Title III Legislative Allowable Activities

In addition to the review of grant activities, WICHE staff reviewed the financial reporting of each institution's NASNTI grant to assess how institutions allocated federal funds to each of the 10 Legislative Allowable Activities (see Figure 2). The analysis showed that resources were more heavily concentrated in areas related to direct students support services and academic improvement activities.

From a resource allocation perspective, tutoring and counseling programs designed to improve student support services received the most support across all NASNTIs. This supports the findings of the review of the grant activities, as direct support to students and their academic and personal success seems to be a priority the most referenced key area of grant implementation. As shown in Figure 2, over \$13 million dollars were spent on 'academic tutoring and counseling programs and students support services which was about 31 percent of all dollars spent between 2011 and 2019.

The second highest category of spending, renovation and improvement in classrooms, libraries, laboratories, and other institutional facilities, represented 19 percent of expenditures and totaled nearly \$8 million. This category was not as salient in the overview of grant activity components but given the nature of larger costs associated with renovations and construction it is not surprising that although few institutions incorporated these activities into their project that it would represent such a large share of overall spending.

The third highest spending category, academic and curriculum development had about \$12 million in total dollars spent between 2011 and 2019. Again, it is not unexpected that this was the third highest spending category given the high number of institutions that included aspects of curriculum development within their project activities.

The remaining 37 percent of dollars spent were across the remaining seven categories, including 10 percent spent on purchase, rental, or lease of scientific or lab equipment for education purposes and another 10 percent spent on other activities.

Conclusion

Title III grants provided by the U.S. Department of Education represent an important and rare resource for eligible NASNTIs to improve their institutional capacities to support AI/AN student attainment. The findings from this descriptive analysis of Title III reports submitted by NASNTIs show how they leveraged permissible activities to build institutional capacity to serve AI/AN students and highlight ways that additional resources can be used in a manner that enhances sustainable, culturally appropriate institutional practices for supporting AI/AN students. NASNTIs used their Title III projects to pursue varied activities to address the needs of their institutions and AI/AN student populations, including efforts to increase Native American cultural awareness across the institution in order to provide high quality academic programs to retain students.

The interconnectedness of grant activities across the four focus areas also highlights how NASNTIs have developed holistic approaches to their Title III grants that expand educational opportunities and support for AI/AN students in and out of the classroom, while also strengthening the necessary institutional systems to sustain these programs. For example, the focus on targeted retention strategies demonstrates an institution's commitment to increase its capacity to serve their current AI/AN students, while the allocation of resources to professional development highlights a desire for institutions to prepare faculty and staff with the resources to better support current and future AI/AN students. This analysis provides insights about how NASNTIs support their large AI/AN student populations, engage with tribal community partners, and advance education opportunities and outcomes for AI/AN students. Future investigation is needed about continuing financial and capacity constraints of NASNTIs and how additional policy and programming opportunities could best address these needs.

Endnotes

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