

INTERSECTING CLASSIFICATIONS:

The Landscape of
Dual- and Multi-Designated
Hispanic-Serving Institutions



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INTERSECTING CLASSIFICATIONS:

The Landscape of Dual- and Multi-Designated Hispanic-Serving Institutions

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INTRODUCTION

The number of Hispanic-Serving Institutions (HSIs) is on the rise, and these institutions now represent about one in five colleges and universities in the United States (*Excelexia* in Education 2024). HSIs—in brief—are accredited, not-for-profit postsecondary institutions with generally low educational expenditures that meet a minimum Hispanic or Latino undergraduate enrollment of 25 percent and a low-income, full-time equivalent undergraduate enrollment of at least 50 percent.¹ Collectively, per the most recent Integrated Postsecondary Education Data System (IPEDS) data, these two-year and four-year colleges and universities enroll just over a third of all undergraduate students in the nation.

HSIs also represent the largest segment of minority serving institutions (MSIs)—an umbrella that encompasses *mission-based institutions* (i.e., Historically Black Colleges and Universities (HBCUs) and American Indian Tribally Controlled Colleges and Universities (TCCUs)) and *enrollment-based institutions* (i.e., 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)).² The MSI umbrella also includes *dual- and multi-designated institutions*—colleges and universities that are eligible for more than one MSI classification.

The growth of HSIs has gone hand in hand with the growth of dual- and multi-designated institutions, with just under a quarter (22 percent) of all HSIs that qualified for another MSI classification.³ The number of institutions that were only eligible for HSI status grew by 40 percent from 2017 to 2024, whereas the number of eligible dual- and multi-designated HSIs experienced a staggering 95 percent increase during the same time period (see table 1).



About one in five HSIs are dual-designated HSIs.⁴

The increase in dual- and multi-designated MSIs largely stems from the enrollment-based criteria for most MSI classifications. As more institutions opened their doors to students of color, the number of enrollment-based MSIs rose over time. The number of HSIs and other enrollment-based MSIs (i.e., AANAPISIs, ANNHSIs, NASNTIs, and PBIs) varies from year to year, however, due to fluctuations in student enrollment and demographics (Aguilar-Smith 2024, 4).

1 [Higher Education Act of 1965](#), 20 U.S.C. § Pub. L. No. 89-329. 2024.

2 This brief uses American Indian Tribally Controlled Colleges and Universities or TCCU to be consistent with statutory language in [Section 316 \(20 U.S.C. 1059\) of the Higher Education Act of 1965](#) (20 U.S.C. § Pub. L. No. 89-329) and the [Tribally Controlled Colleges and Universities Assistance Act of 1978](#) (25 U.S.C. § Pub. L. No. 95-471). For more information about enrollment-based institutions, refer to M. H. Nguyen, Ramirez, and Laderman 2023 and Espinoza 2024b.

3 The universe of eligible HSIs referred to in this brief was constructed by aggregating institutions that were either *currently funded* or *eligible, not funded* per Title V Part A, Developing Hispanic-Serving Institutions Program; Title V Part B, Promoting Postbaccalaureate Opportunities for Hispanic Americans (PPOHA) Program; and Title III Part F, Hispanic-Serving Institutions—Science, Technology, Engineering, and Mathematics (STEM) and Articulation Programs. For more details on the data and methodology, please refer to the technical appendix.

4 Data are from the U.S. Department of Education’s (ED) eligibility matrix for fiscal year 2024.

Table 1. Unduplicated Count of Eligible HSIs, by Number of MSI Classifications: 2017–24

MSI Classification Count	2017	2018	2019	2020	2021	2022	2023	2024
1	318	349	366	369	398	423	414	444
2	64	71	82	90	96	121	122	125
3	0	1	1	2	2	1	1	0
Total	382	421	449	461	496	545	537	569

Sources: Data on eligible MSIs for 2017–21 are from the MSI Data Project dataset V1.1 (Nguyen, Laderman, et al., 2023), and such data for 2022–24 are from the U.S. Department of Education’s (ED) eligibility matrices.

Note: When estimating the number of MSIs and their corresponding intersecting configurations, we included colleges and universities that met statutory definitions for any given MSI designation or were current grantees of federal Title III and/or Title V funding. For more details on the data and methodology, please refer to the technical appendix.

Amid these trends, this brief sketches the landscape of dual- and multi-designated HSIs to provide a fuller picture of these racialized organizations and the communities they serve.⁵ As such, it explores how colleges and universities should serve Hispanic or Latino students in practice to advance *servingness*—a multidimensional concept proposed by Garcia et al. 2019 that is useful in “understand[ing] what it means to move from simply *enrolling* Latinx students to actually *serving* them” (Garcia 2019, 1). Importantly, the emergence and growth of dual- and multi-designated HSIs prompts considering—or reconsidering—how these institutions should serve their increasingly diverse campus communities.

Recognizing the resource needs of most HSIs, this brief also discusses federal funding for HSIs. Even more, it identifies federal statutes that limit dual- and multi-designated HSIs’ access to this often much-needed support.

In sum, by highlighting dual- and multi-designated HSIs alongside funding conditions that are likely shortchanging these institutions, this brief addresses intersectional servingness (Garcia and Cuellar 2023). This brief specifically adopts an institutional-level perspective to show how intersecting structures (i.e., MSI classifications) can not only stymie capacity-building efforts of MSIs but ultimately the experiences and outcomes of racially and ethnically minoritized college students as well. Above all, this brief aims to help policymakers and educational leaders to better understand and support dual- and multi-designated HSIs and their diverse student bodies.

THE LANDSCAPE OF DUAL- AND MULTI-DESIGNATED HSIS

Diversity extends beyond the characteristics of individual students to the institutions that are serving them. In the case of HSIs, this group of nearly 600 colleges and universities varies along numerous lines, such as institutional control (i.e., public and private), level (i.e., two-year and four-year), size, location, student racial and ethnic composition, and more (Aguilar-Smith 2024). Importantly, the diversity of HSIs’ student populations means that some of these institutions classify for other MSI designations, as most MSIs are enrollment-based (Espinoza 2024a).

Data from the [MSI Data Project](#) and the U.S. Department of Education’s (ED) eligibility matrices from 2017 to 2024 indicate that there had been six dual- and multi-designated HSI combinations: AANAPISI–HSI, AANAPISI–HSI–PBI, ANNHSI–HSI–NASNTI, HBCU–HSI, HSI–NASNTI, and HSI–PBI (see table 2).⁶ However, in 2024, four dual-designated HSI combinations (i.e., AANAPISI–HSI, HBCU–HSI, HSI–NASNTI, HSI–PBI) spanned 16 states and the District of Columbia.

⁵ HSIs are racialized organizations, as this designation hinges on students’ racial or ethnic identities (Garcia 2019).

⁶ Espinoza (2024a) identified these combinations as part of a larger descriptive quantitative study of all dual- and multi-designated MSIs from 2017 to 2023. Additionally, similar to other scholars (e.g., Alcantar et al. 2020), we present the combinations in alphabetical order so as to not privilege one classification over another. We also use an en dash (–) to represent a connection between these federal classifications instead of a forward slash (/), which traditionally symbolizes division or either/or.

Table 2. Unduplicated Count of Dual- and Multi-Designated HSIs, by Combination: 2017–24

HSI Classification Combination	2017	2018	2019	2020	2021	2022	2023	2024
AANAPISI–HSI	60	61	68	80	88	109	111	113
AANAPISI–HSI–PBI	0	1	1	1	1	1	1	0
ANNHSI–HSI–NASNTI	0	0	0	1	1	0	0	0
HBCU–HSI	0	0	0	0	0	1	1	1
HSI–NASNTI	1	2	2	1	2	3	2	3
HSI–PBI	3	8	12	9	6	8	8	8
Total	64	72	83	92	98	122	123	125

Sources: Data for eligible MSIs for 2017–21 are from the MSI Data Project dataset V1.1 (Nguyen, Laderman, et al., 2023), and such data for 2022–24 are from the ED’s eligibility matrices.

Note: When estimating the number of MSIs and their corresponding intersecting configurations, we included colleges and universities that met statutory definitions for any given MSI designation or were current grantees of federal Title III and/or Title V funding. For more details on the data and methodology, please refer to the technical appendix.

WHERE ARE THESE INSTITUTIONS?

While four combinations of dual-designated HSIs currently exist, institutions that met the criteria for classification as an HSI and an AANAPISI saw the most growth; this dual-designation represented the majority, with 113 institutions classified as AANAPISI–HSIs per the most recent eligibility matrix data. These 113 colleges and universities spanned 15 states across the continental United States (see table 3).

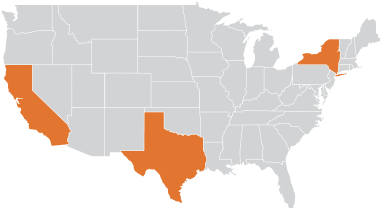
Table 3. Unduplicated Dual-Designated HSI Combinations, by State: 2024

	AANAPISI–HSI	AANAPISI–HSI–PBI	HBCU–HSI	HSI–NASNTI	HSI–PBI	Total
California	71	0	0	0	1	72
Colorado	1	0	0	0	0	1
Connecticut	3	0	0	0	0	3
District of Columbia	0	0	0	0	1	1
Florida	1	0	0	0	0	1
Georgia	1	0	0	0	0	1
Illinois	3	0	0	0	3	6
Maryland	1	0	0	0	0	1
Nevada	3	0	0	0	0	3
New Jersey	3	0	0	0	2	5
New Mexico	0	0	0	2	0	2
New York	14	0	0	0	1	15
Oregon	1	0	0	0	0	1
Tennessee	1	0	0	0	0	1
Texas	8	0	1	0	0	9
Virginia	1	0	0	0	0	1
Washington	0	0	0	1	0	1
Wisconsin	1	0	0	0	0	1
Total	113	0	1	3	8	125

Source: Data are from the U.S. ED’s eligibility matrix for fiscal year 2024.

Note: When estimating the number of MSIs and their corresponding configurations, we included colleges and universities that met statutory definitions or were current grantees of federal Title III and/or Title V funding. The technical appendix provides more details on the data and methodology.

Given historical and present demographic settlement and migratory patterns, however, most AANAPISI–HSIs (63 percent) were in California as of 2024 (N = 71). Next were New York and Texas, which had 14 and eight AANAPISI–HSIs, respectively, as of 2024. Notably, at this time, Texas had the only eligible HBCU–HSI in the nation—Huston–Tillotson University.⁷

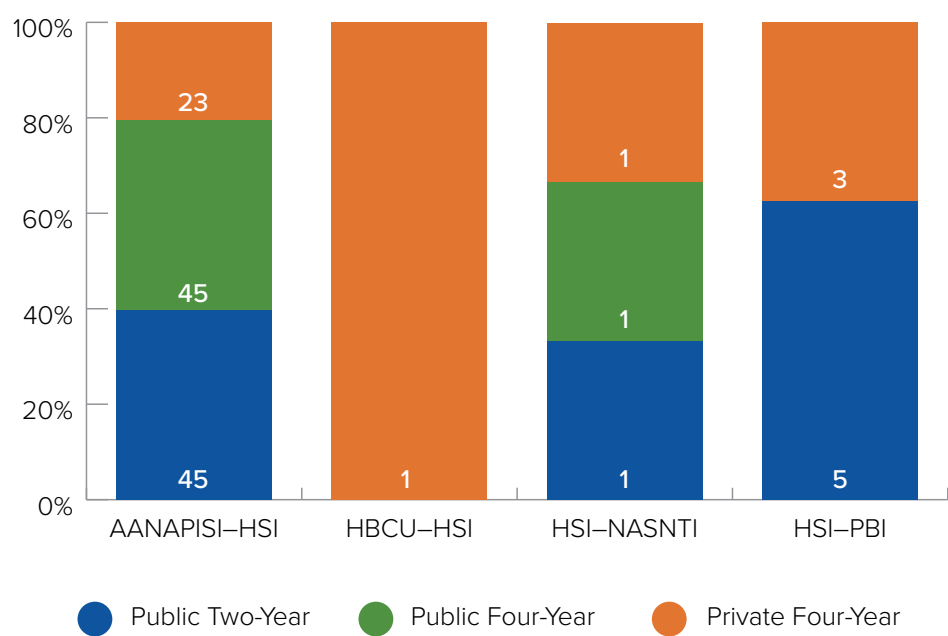


California had 63 percent of all dual- and multi-designated HSIs. New York and Texas had the second and third-highest numbers of dual- and multi-designated HSIs.⁸

WHAT IS THIS GROUP’S SECTOR BREAKDOWN?

As of 2024, almost 80 percent of all dual-designated HSIs were public institutions (97 of 125). Specifically, as shown in figure 1, 51 were public two-year institutions and 46 were public four-year institutions. A little over one-fifth were private four-year institutions (28 of 125).

Figure 1. Unduplicated Dual-Designated HSI Combinations, by Sector: 2024



Sources: Data are from the U.S. ED’s eligibility matrix for fiscal year 2024. Data for an institution’s sector characteristics (i.e., control and level) are from 2022–23 IPEDS for those with missing information in the eligibility matrix.

Note: When estimating the number of MSIs and their corresponding configurations, we included colleges and universities that met statutory definitions or were current grantees of federal Title III and/or Title V funding. The technical appendix provides more details on data and methodology.

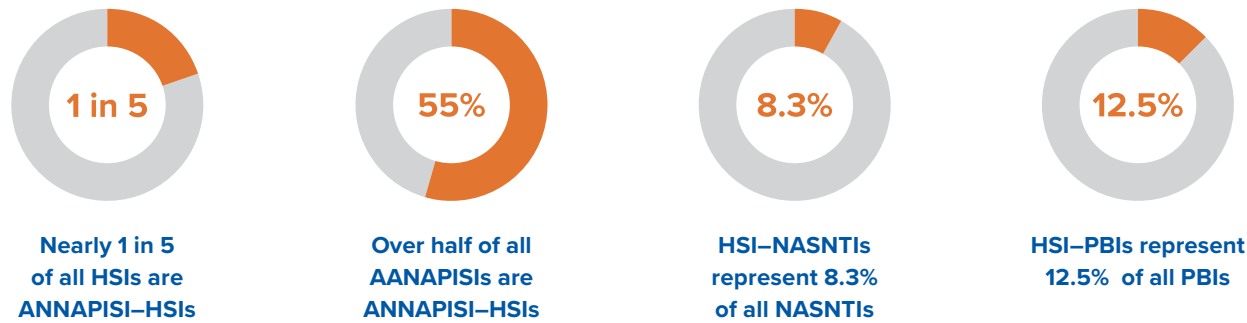
⁷ Traditionally, St. Philip’s College has been recognized as an HBCU and an HSI. Indeed, the college publicizes itself accordingly (St. Philip’s College 2025). However, ED’s eligibility matrix did not list St. Phillip’s College as an eligible HSI in 2024. This surfaces the variable nature of enrollment-based MSIs; such institutions need to routinely reapply for these designations because they largely depend on student demographics, which may fluctuate from year to year, as might waivers (see ED 2024).

⁸ Data are from the U.S. ED’s eligibility matrix for fiscal year 2024.

WHERE DO DUAL-DESIGNATED HSIs STAND AMONG ALL INTERSECTING MSI CLASSIFICATIONS?

Compared with all intersecting MSI classifications, dual-designated HSIs represented the largest share (see figure 2). For example, in 2024, one in five eligible HSIs were AANAPISI–HSIs (again, 113 of the 569 eligible HSIs). In contrast, 55 percent of all eligible AANAPISIs were AANAPISI–HSIs (113 of the 207 eligible AANAPISIs in 2024). Meanwhile, although HSI–PBIs represented about 1 percent of all eligible HSIs, these eight institutions represented about 13 percent of the 64 PBIs across the country. Similarly, while the three current HSI–NASNTIs represented less than 1 percent of all eligible HSIs, about 8 percent of the 36 current NASNTIs were also classified as HSIs.

Figure 2. Breakdown of Dual-Designated HSIs Among MSIs: 2024



Source: Data are from the U.S. ED’s eligibility matrix for fiscal year 2024.

Note: When estimating the number of MSIs and their corresponding configurations, we included colleges and universities that met statutory definitions or were current grantees of federal Title III and/or Title V funding. The technical appendix provides more details on the data and methodology.

Finally, as table 4 indicates, one-third of all undergraduate students who were enrolled at HSIs across the country attended a dual-designated HSI.

Table 4. Total Undergraduate Fall Enrollment, by HSI Classifications Nationwide: 2024

HSI Classifications	N	Total Enrollment	%	Minimum Enrollment	Maximum Enrollment	Average Enrollment	Standard Deviation
AANAPISI–HSI	113	1,511,297	32.85	32	57,512	13,374	11,508
HBCU–HSI	1	991	0.02	991	991	991	N/A
HSI–NASNTI	3	2,775	0.06	796	1,154	925	199
HSI–PBI	8	23,204	0.50	426	6,466	2,901	2,051
HSI	443	3,062,383	66.56	34	68,415	6,913	9,502
HSI Total	568	4,600,650	100.00	32	68,415	8,100	10,198

Sources: Data are from the U.S. ED’s eligibility matrix for fiscal year 2024. The total undergraduate fall enrollment headcount was derived from 2022–23 IPEDS Fall Enrollment data.

Note: When estimating the number of MSIs and their corresponding configurations, we included colleges and universities that met statutory definitions or were current grantees of federal Title III and/or Title V funding. The technical appendix provides more details on the data and methodology.

THE CASE OF CALIFORNIA: AN OVERVIEW OF DUAL-DESIGNATED HSIs

California is home to the largest number of HSIs overall (*Excelexencia* in Education 2024) and the largest number of dual-designated HSIs. We report on the landscape of dual-designated HSIs by IPEDS institutional sector (i.e., control and level), the Carnegie Classification of Institutions of Higher Education, U.S. congressional districts, and fall enrollment.⁹

HOW MANY ARE PUBLIC? HOW MANY ARE PRIVATE?

When disaggregated by institutional control, most were public institutions (78 percent)—particularly public AANAPISI–HSIs. Specifically, there were 55 public AANAPISI–HSIs and one public HSI–PBI in California (see table 5).

Table 5. Unduplicated Dual- and Multi-Designated HSIs in California, by Combination and Sector: 2024

HSI Classification Combination	Public		Private	Total
	Two-Year	Four-Year	Four-Year	
AANAPISI–HSI	35	20	16	71
AANAPISI–HSI–PBI	0	0	0	0
ANNHSI–HSI–NASNTI	0	0	0	0
HBCU–HSI	0	0	0	0
HSI–NASNTI	0	0	0	0
HSI–PBI	1	0	0	1
Total	36	20	16	72

Sources: Data are from the U.S. ED’s eligibility matrix for fiscal year 2024. Data for an institution’s sector characteristics (i.e., control and level) are from 2022–23 IPEDS Institutional Characteristics data for those with missing information in the eligibility matrix.

Note: When estimating the number of MSIs and their corresponding configurations, we included colleges and universities that met statutory definitions or were current grantees of federal Title III and/or Title V funding. The technical appendix provides more details on the data and methodology.

Dual-designated HSIs span California’s three public higher education systems, with 40 in the California Community Colleges (CCC) system, 11 in the California State University (CSU) system, and five in the University of California (UC) system. Examples of such institutions include Pasadena City College, CSU Sacramento, and UC Riverside—all of which have been classified as AANAPISIs and HSIs.

Notably, the UC system is on the verge of becoming an AANAPISI–HSI system, as UC Davis, UC Berkeley, UCLA, and UC San Diego are moving toward becoming HSIs. Indeed, nearly all of the baccalaureate degree-granting institutions within the UC system will soon be AANAPISI–HSIs.

In 2024, just over one in five dual-designated HSIs (16 out of 72) in California were four-year private AANAPISI–HSIs, and half of these were religiously affiliated. Examples of such universities include Azusa Pacific University and the University of the Pacific.

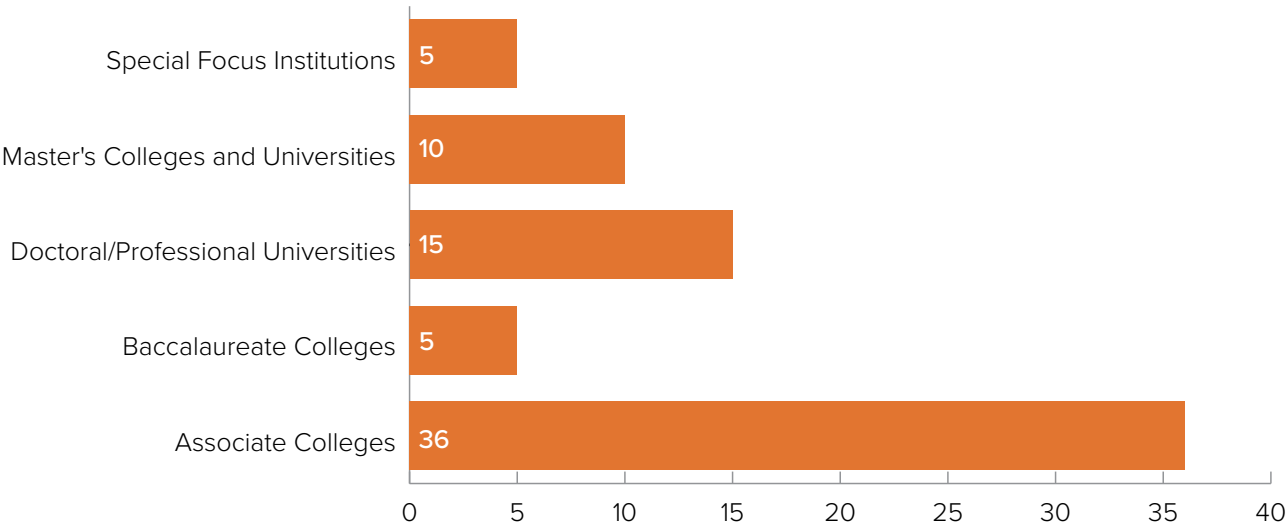
⁹ U.S. congressional districts in California were derived from the State of California Senate Office of Demographics’ [Zip Code Directory](#) in 2023–24.

HOW MANY ARE COMMUNITY COLLEGES? HOW MANY ARE FOUR-YEAR INSTITUTIONS?

California was found to have equal numbers of four-year and two-year public dual-designated HSI; each group consisted of 36 institutions (see table 5). However, of the 72 total dual-designated HSIs in California, two-year public colleges accounted for half and represented the largest single segment.¹⁰ The CCC system was home to most of these colleges, including Mt. San Antonio College and Pasadena City College.

Dual-designated HSIs in California were also considered according to the Carnegie Classifications’ 2021 Basic Classifications (see figure 3). Again, half were associate colleges (n = 36). However, among their four-year peers within the state, most were doctoral and/or professional universities (n = 15), followed by master’s colleges and universities (n = 10).

Figure 3. Dual-Designated HSIs in California, by Carnegie Classifications: 2024



Source: Data are from the U.S. ED’s eligibility matrix for fiscal year 2024.

Notes: When estimating the number of MSIs and their corresponding configurations, we included colleges and universities that met statutory definitions or were current grantees of federal Title III and/or Title V funding. The technical appendix provides more details on the data and methodology. We aggregated Carnegie’s 2021 Basic Classifications: associate colleges, baccalaureate colleges, doctoral and/or professional universities, master’s colleges and universities, and special focus institutions.

WHERE IN CALIFORNIA ARE THESE INSTITUTIONS?

The majority of AANAPISI–HSIs in California were identified in congressional districts 14, 16, and 47 (see figure 4). District 14—in the heart of the East Bay, including Hayward, Livermore, and Oakland—was home to five dual-designated HSIs.¹¹ Four such institutions were in District 16, which spans the South Bay, Midpeninsula, and coastal San Mateo County in northern California, and another four were in District 47, which includes the cities of Costa Mesa, Huntington Beach, and Irvine. District 43, which covers parts of the southern part of Los Angeles County, is home to not only two AANAPISI–HSIs but also to the sole HSI–PBI in California—Los Angeles Southwest College.

10 As some community colleges have expanded to offer baccalaureate degrees, these primarily associate-awarding colleges have been reclassified in IPEDS as four-year institutions (Fink and Jenkins 2020; Soler 2019). For example, among the dual-designated HSIs in California in 2024, there are four institutions that are traditionally understood as public community colleges classified as four-year institutions: Cypress College, Foothill College, San Diego Mesa College, and Solano Community College.

11 Although Holy Names University closed in 2023, it was included in this analysis because ED listed this university within its 2024 eligibility matrix.

Figure 4. Dual-Designated HSIs in California



- Dual-designated HSIs in California were primarily public institutions
- Over one in five of the California AANAPISI–HSIs were private four-year institutions
- The San Francisco Bay Area had the largest number of AANAPISI–HSIs in the state
- Los Angeles had the second-largest concentration of AANAPISI–HSIs in the state and was home to the only HSI–PBI

Source: Data are from the U.S. ED’s eligibility matrix for fiscal year 2024.

Note: When estimating the number of MSIs and their corresponding configurations, we included colleges and universities that met statutory definitions or were current grantees of federal Title III and/or Title V funding. The technical appendix provides more details on the data and methodology.

HOW MANY STUDENTS ATTEND THESE DUAL-DESIGNATED COLLEGES AND UNIVERSITIES?

As indicated in table 6, dual-designated AANAPISI–HSIs in California accounted for 54 percent of the total undergraduate fall enrollment across all HSIs in the state.

Table 6. Total Undergraduate Fall Enrollment, by HSI Classifications in California: 2024

HSI Classifications	N	Total Enrollment	%	Minimum Enrollment	Maximum Enrollment	Average Enrollment	Standard Deviation
AANAPISI–HSI	71	880,119	53.98	32	35,432	12,396	9,422
HSI–PBI	1	4,913	0.30	4,913	4,913	4,913	N/A
HSI	87	745,470	45.72	45	32,181	8,569	6,879
HSI Total	159	1,630,502	100.00	32	35,432	10,255	8,300

Sources: Data are from the U.S. ED’s eligibility matrix for fiscal year 2024. The total undergraduate fall enrollment headcount was derived from 2022–23 IPEDS Fall Enrollment data.

Note: When estimating the number of MSIs and their corresponding configurations, we included colleges and universities that met statutory definitions or were current grantees of federal Title III and/or Title V funding. The technical appendix provides more details on the data and methodology.

Over half (53.4 percent) of the total undergraduate fall enrollment at HSIs in California were from AANAPISI–HSIs.¹²

¹² Data are from the U.S. ED’s eligibility matrix for fiscal year 2024. The total undergraduate fall enrollment headcount was derived from 2022–23 IPEDS Fall Enrollment data.

FEDERAL GRANT PROGRAMS FOR MINORITY SERVING INSTITUTIONS

Beyond formally recognizing institutions that assume the bulk of the work of educating communities of color, the federal government has also set aside money to support MSIs, given most of these institutions' historical and present underfunding. Table 7 presents a selection of federal grant programs that are administered by ED, which are especially relevant considering the current slate of dual-designated HSIs.¹³

As table 7 suggests, Title III Part A and Title III Part F include separate programs for the various enrollment-based MSIs. This title includes standalone grant programs for AANAPISIs, ANNHISIs, NASNTIs, and PBIs that are relevant to current and emerging dual-designated HSIs across the country. With the exception of formula-based funding for PBIs available through Title III Part A, all of these programs are discretionary—meaning that eligible institutions compete for this funding. Similarly, ED awards Title V grants on a competitive basis.

In the case of competitive programs, MSIs prepare extensive proposals to apply for the corresponding federal grants. For example, HSIs that award graduate or professional degrees may compete for Title V Part B funding when ED invites applications for such awards. Likewise, HSIs may compete for Title V Part A grants when a cycle opens. As with all competitions, not all eligible beneficiaries participate, and not all applicants succeed in securing this funding. Case in point, an analysis of the distribution of Title V Part A grants from 2009 to 2017 showed that approximately a third of HSIs never pursued this funding during this period, and only 30 percent of applicants successfully obtained this federal support despite most applying several times during this eight-year window (Aguilar-Smith and Yun 2023).

Although most federal funding for MSIs is competitively awarded, the government also provides formula-based awards to HBCUs, PBIs, and TCCUs. In these cases, designated institutions receive a set amount based on specified funding formulas—assuming that congressional appropriations allow for disbursement.

Whether competitively awarded or formula-based, the overall purpose of these grants is to help build MSIs' institutional capacity. With this overarching aim, ED directs money to institutions for a range of authorized activities instead of to individual students, as with Pell Grants, or to researchers, like with most U.S. National Science Foundation or National Institutes of Health grants. Illustratively, Los Angeles Harbor College, an AANAPISI–HSI community college, obtained a Title V Part A grant in 2023 for its *Alcanzando el Éxito* (Reaching Success) program, which aims to improve “Hispanic and low-income students” success and transfer rates by “building an aspirational and continuous student pipeline from high school to college to transfer to 4-year universities and by offering integrated academic and student support services” (ED 2023, 23).¹⁴

More broadly, ample studies testify to the transformative potential of these competitively awarded grants, particularly for AANAPISIs and HSIs (Maramba and Fong 2020; Museus et al. 2018; Museus et al. 2022; B. M. D. Nguyen et al. 2022; M. H. Nguyen 2025; M. H. Nguyen, Gogue, et al. 2023; Petrov and Garcia 2021; Roberts and Lucas 2022). Indeed, scholars have increasingly documented how these federal resources have been leveraged to build or strengthen the critical infrastructures that are key to serving certain student populations. For instance, some MSIs have invested this federal funding to create undergraduate research opportunities (Museus et al. 2018; M. H. Nguyen 2025), establish holistic advising (Petrov and Garcia 2021), develop or expand curricular alignment with ethnic studies (Museus et al. 2018; M. H. Nguyen 2024; M. H. Nguyen, Gogue, et al. 2023), and expand campus counterspaces (Roberts and Lucas 2022).

13 See Dortch 2023 for more information on federal grant programs for MSIs authorized by the Higher Education Act, and refer to the Office of Postsecondary Education's “[Eligibility Designations for Higher Education Programs](#)” on ED's website for eligibility designations, processes, and matrices from 2005 to 2024.

14 To date, Los Angeles Harbor College has not been awarded Title III Part A or Part F AANAPISI funding but has obtained state-level funding via the Asian American, Native Hawaiian, and Pacific Islander Student Achievement Program, authorized by [California Education Code Sections 79510–79511](#). This funding enabled the college to expand its Asian Pacific American Student Success program (Olson et al. 2024).

Overall, these studies have mainly addressed the activity and impact of this federal funding for AANAPISIs or HSIs rather than for dual-designated institutions. Accordingly, there is a prime opportunity to attend to the transformative possibilities of this funding among institutions that have intersecting MSI classifications, including dual-designated HSIs. As the number of dual-designated HSIs grows, policy, practice, and research must evolve to intentionally contend with servingness in this distinct organizational context.

Table 7. Selected U.S. Department of Education Programs for Minority Serving Institutions

	AANAPISI	ANNHSI	HBCU	HSI	NASNTI	PBI	PMI	TCCU
Title II Part B: Augustus F. Hawkins Centers of Excellence Program*	✓	✓	✓	✓	✓	✓	x	✓
Title III Part A: Strengthening Institutions								
AANAPISI Program*	✓	x	x	x	x	x	x	x
ANNHSI Program*	x	✓	x	x	x	x	x	x
TCCU Program*	x	x	x	x	x	x	x	✓
NASNTI Program*	x	x	x	x	✓	x	x	x
PBI Program—Formula Grants	x	x	x	x	x	✓	x	x
Strengthening Institutions Program*	✓	✓	✓	✓	✓	✓	✓	✓
Title III Part B								
Strengthening HBCUs Program*	x	x	✓	x	x	x	x	x
Strengthening Historically Black Graduate Institutions Program (HBGI)**†	x	x	✓	x	x	x	x	x
Title III Part E Subpart 1: Minority Science and Engineering Improvement Program**‡	x	x	x	x	x	x	✓	x
Title III Part F								
AANAPISI Program*	✓	x	x	x	x	x	x	x
ANNHSI Program*	x	✓	x	x	x	x	x	x
HSI-STEM and Articulation Programs*	x	x	x	✓	x	x	x	x
NASNTI Program*	x	x	x	x	✓	x	x	x
PBI Program—Competitive Grants*	x	x	x	x	x	✓	x	x
TCCU Program	x	x	x	x	x	x	x	✓
Title V: Developing Institutions								
Part A: Developing HSIs*	x	x	x	✓	x	x	x	x
Part B: PPOHA*§	x	x	x	✓	x	x	x	x
Title VII Part A Subpart 4: Master's Degree Programs								
Master's Degree Programs at HBCUs (HBCU MA)**	x	x	✓	x	x	x	x	x
Master's Degree Programs at PBIs#	x	x	x	x	x	✓	x	x

Source: Data are from the U.S. ED's [Office of Postsecondary Education](#).

* The program is discretionary or competitive, not formula-based. A PMI refers to a predominantly minority institution—a not-for-profit college or university that enrolled mostly students of color.

† Of all 24 Historically Black Graduate Institutions (HBGIs), 23 were HCBUs, with Charles R. Drew University of Medicine and Science as the exception. However, not all HBCUs were HBGIs; thus, they were not all eligible for funding via the Title III Part B: Strengthening HBGIs Program.

‡ Institutions that enrolled a minimum of 50 percent Pell Grant recipients were eligible for Title III Part E Subpart 1: Minority Science and Engineering Improvement Program funding—not only MSIs. However, given the criteria for most MSI classifications and most MSIs' student demographics, nearly all MSIs were eligible for this funding.

§ Only HSIs that award graduate or professional degrees or certificates are eligible for Title V Part B funding.

|| Only a select group of 18 HBCUs may receive funding via Title VII Part A Subpart 4: Master's Degree Programs at HBCUs. This funding is designed to improve master's programs in mathematics, engineering, physical or natural sciences, computer science, information technology, nursing, allied health, or other scientific disciplines in which Black or African American students are underrepresented.

Only a select group of five PBIs may receive funding via Title VII Part A Subpart 4: Master's Degree Programs at PBIs. This funding is designed to improve master's programs in mathematics, engineering, physical or natural sciences, computer science, information technology, nursing, allied health, or other scientific disciplines wherein Black or African American students are underrepresented.

STATUTORY BARRIERS TO ACCESSING FEDERAL FUNDING FOR DUAL-DESIGNATED HSIs

The creation of and continual investment in these federal grant programs is cause for celebration. The increasing number of dual-designated HSIs somewhat tempers this victory, however, given existing statutes that prohibit MSIs from simultaneously accessing some of these funding streams. In particular, relevant to the current set of dual-designated HSIs, the U.S. Code (last enacted on December 11, 2024) maintains the following:

TITLE III PART A SEC. 318. 20 U.S.C. § 1059e(h)(i) SPECIAL RULE ON ELIGIBILITY. No Predominantly Black Institution that receives funds under this section shall concurrently receive funds under any other provision of this part, part B, or part A of subchapter V.

TITLE III PART A SEC. 319. 20 U.S.C. § 1059f(d3)(A) SPECIAL RULES—ELIGIBILITY. No Native American-serving, nontribal institution that receives funds under this section shall concurrently receive funds under any other provision of this part, part B, or part A of title V.

TITLE III PART A SEC. 320. 20 U.S.C. § 1059g(d3)(A) SPECIAL RULES—ELIGIBILITY. No Asian American and Native American Pacific Islander-serving institution that receives funds under this section shall concurrently receive funds under any other provision of this part, part B, or title V.

TITLE III PART B SEC. 326. 20 U.S.C. § 1063b.(h) INTERACTION WITH OTHER GRANT PROGRAMS. No institution that is eligible for and receives an award under section 512, 723, or 724 for a fiscal year shall be eligible to apply for a grant, or receive grant funds, under this section for the same fiscal year.

TITLE V PART A SEC. 505. 20 U.S.C. § 1101d. SPECIAL RULE. No Hispanic-serving institution that is eligible for and receives funds under this title may receive funds under part A or B of Title III during the period for which funds under this title are awarded.

Plainly, this statutory language means that an HSI cannot be concurrently the lead awardee of a Title V and a Title III Part A grant or Title III Part B funding.¹⁵ In effect, these special rules force AANAPISI–HSIs to pursue either Title V grants or Title III AANAPISI grants but not both at the same time. In this way, this statute upholds a binary understanding of MSIs and flattens the dynamism of MSIs that have intersecting classifications and serve diverse communities (Yang and Masulit 2018). If this issue goes unaddressed, the full potential of these promising federal programs may not be realized.

¹⁵ Legally, an institution can be the lead or primary institution on an individual or cooperative Title III or Title V grant and a partner institution on a cooperative Title III or Title V grant at the same time. For example, in 2021, California State University, Sacramento obtained a Title V Part A grant and a Title III Part F cooperative grant (Morales 2021; Reid 2021).

CALL TO ACTION

Dual-designated HSIs represent a growing share of HSIs, meaning that the makeup and needs of this racialized group of organizations are in flux. In response to HSIs' ongoing evolution and increasing diversity, we urge researchers, practitioners, and policy advocates to:

1. Rethink servingness within this context to better support the many communities this growing set of HSIs serves.
2. Estimate the potential financial impact of the current statutory limitations on dual- and multi-designated MSIs (i.e., how much Title III and Title V funding have these institutions potentially forgone, through which they could have advanced servingness?).
3. Reconsider the rules, regulations, and statutes regarding federal funding for MSIs, particularly as the number of institutions with intersecting MSI classifications grows.
 - › For instance, repealing the statute limiting access to Title III and Title V funding among dual- and multi-designated MSIs—including those that are perniciously underresourced—merits consideration.
4. Advocate for a version of the previously introduced Minority-Serving Institution Fairness Act, which would allow institutions to concurrently receive funding under Title III and Title V.¹⁶
5. Strengthen coalitions across advocacy networks, congressional caucuses, and White House initiatives, among other avenues to advance intersectional servingness via public policy within and among (dual- and multi-designated) MSIs.¹⁷

In the interest of advancing intersectional servingness and considering the documented and reasonably anticipated growth of dual- and multi-designated HSIs, the need to contend with the diversifying context of HSIs that already exists is greater now than ever.

¹⁶ See the [Minority-Serving Institution Fairness Act, H.R. 4098 114th Congress](#) (2015) and [Minority-Serving Institution Fairness Act, S. 2317 114th Congress](#) (2015).

¹⁷ Building support among, for example, the Congressional Asian Pacific American Caucus, Congressional HSI Caucus, Congressional PBI Caucus, Congressional Bipartisan HBCU Caucus, and the Congressional Native American Caucus would be beneficial. Also, although the current administration eliminated most standing MSI-relevant White House initiatives (Executive Office of the President 2025), collaboration with the White House Initiative on Advancing Educational Equity, Excellence, and Economic Opportunity for Black Americans through HBCUs and members previously involved in the following defunct initiatives would be apt: White House Initiative on Advancing Educational Equity, Excellence, and Economic Opportunity Through Hispanic-Serving Institutions; White House Initiative on Asian Americans, Native Hawaiians, and Pacific Islanders; and White House Initiative on Advancing Educational Equity, Excellence, and Economic Opportunity for Native Americans and Strengthening Tribal Colleges and Universities.

TECHNICAL APPENDIX

DATA SOURCES AND METHODOLOGY

This policy brief draws on different sources to identify accredited, not-for-profit two-year and four-year colleges and universities that are eligible for federal MSI classifications—namely, dual- and multi-designated HSIs. The list of eligible MSIs and their corresponding classifications was manually constructed using two data sources: the MSI Data Project dataset V1.1 and the U.S. Department of Education’s (ED) eligibility matrices. Specifically, data for eligible MSIs (i.e., “eligible, not funded” and “currently funded”) for 2017–21 are from the MSI Data Project dataset V1.1 (M. H. Nguyen, Laderman, et al. 2023), and such data for 2022–24 are from ED eligibility matrices. Upon appending these data, the universe of possible dual- and multi-designated MSI classifications was created.

Institutional UnitID, sector (i.e., control and level), zip codes, and undergraduate fall enrollment were downloaded from ED’s National Center for Education Statistics Integrated Postsecondary Education Data System (IPEDS) and matched to the eligible dual- and multi-designated MSI list using UnitIDs. Missing institutional identification numbers (i.e., UnitID) were corrected using ED’s Office of Postsecondary Education Database of Accredited Postsecondary Institutions and Programs (DAPIP).

U.S. Congressional Districts for California were constructed by matching IPEDS zip codes with the State of California Senate Office of Demographics’ [Zip Code Directory](#) in 2023–24.

Additional notes are detailed herein:

2017–21 Eligible MSIs from the MSI Data Project Dataset V1.1

M. H. Nguyen, Laderman, et al. (2023) published version 1.1 of the MSI Data Project’s dataset in July 2023. Based on M. H. Nguyen, Ramirez and Laderman’s (2023) typology, the dataset pulls from ED eligibility matrices for fiscal years 2017–21 and IPEDS from 2015–19. For more details on the MSI Data Project dataset V1.1, refer to M.H. Nguyen, Heckert, et al.’s (2023) technical appendix.

The MSI Data Project variables used are listed parenthetically.

- Eligible AANAPISIs were identified by filtering for institutions that were “currently funded” for AANAPISI Part A (aanapisi_funded) and AANAPISI Part F (aanapisi_f_funded) and “eligible” for AANAPISI Part A (m_elig_aanapisi) and AANAPISI Part F (m_elig_aanapisi_f).
- Eligible ANNHSIs were identified by filtering for institutions that were “currently funded” for AANAPISI Part A (annhsi_funded) and ANNHSI Part F (annhsi_f_funded) and “eligible” for ANNHSI Part A (m_elig_annhsi) and AANAPISI Part F (m_elig_annhsi_f).
- Eligible HSIs were identified by considering all institutions that were “currently funded” and “eligible, not funded” for Developing HSI, HSI–PPOHA, or HSI–STEM grants.
- Eligible HBCUs were identified by filtering for institutions that were classified as a “current grantee” or “currently funded” HBCU, HBGI, or HBCU MA.
- Eligible PBIs were identified by filtering for institutions that were “currently funded” for PBI Part A (pbi_a_funded), PBI Part F (pbi_f_funded), or PBI MD (pbi_md_funded) and “eligible” for PBI Part A (m_elig_pbi), PBI Part F (m_elig_pbi_f), or PBI MD (m_pbi_md).
- Eligible TCCUs were identified by filtering for institutions that were classified as a “currently funded TCCU” (fundedtxt) or “current grantee” for TCCU (m_tccu).
- Eligible NASNTI were identified by filtering for institutions that were “currently funded” for NASNTI Part A (nasnti_funded) or NASNTI Part F (nasnti_f_funded) and “eligible” for NASNTI Part A (m_elig_nasnti) or NASNTI Part F (m_elig_nasnti_f).

2022–24 Eligible MSIs from ED Eligibility Matrices

Unlike ED eligibility matrices for fiscal years 2017–21, those for fiscal years 2022–24 present the MSI classifications on separate Microsoft Excel sheet tabs. Except for the HBCU and TCCU sheet tabs, all other MSI classification sheet tabs had columns that indicated whether institutions meet “General Eligibility” (“Yes” or “No”) and if they meet the Title III or V definition (“Yes” or “No”).

- Eligible AANAPISIs, ANNHSIs, HSIs, NASNTIs, and PBI were identified by filtering for institutions that were listed as “Yes” under either meeting statutory definitions or under having an open MSI grant of any kind.
- Eligible TCCUs were identified by filtering for institutions that were listed as “Yes” under the “TCCU” column.
- Eligible HBCUs were identified by filtering for institutions that were listed as “Yes” in the “HBCU” column. To note, HBCUs include institutions that were eligible for any of the following federal grant programs:
 - › (a) Title III Part B: Strengthening HBCU Program
 - › (b) Title III Part B: Strengthening HBGI Program
 - › (c) Title VII Part A: Master’s Degree Programs at Historically Black Colleges and Universities
- HBGIs and master’s degree programs at HBCUs were manually generated using the lists of institutions indicated within the authorizing legislation.

Additional Notes for Eligible HSIs from ED’s 2023 Eligibility Matrix

Certain institutions were manually added or corrected due to missing information; such instances are detailed in the following information.

- Manually added Dewey University–Hato Rey to the aggregate eligible HSI list.
 - › Dewey University–Hato Rey showed “NULL” under “Meets the 2023 Title V HSI Definition,” but it was marked as “Yes” under the “Open HSI Grant” column.
- Manually added Notre Dame de Namur University to the aggregate eligible HSI list.
 - › Notre Dame de Namur University showed “NULL” under “Meets the 2023 Title V HSI Definition,” but it was marked as “Yes” under the “Open HSI Grant” column.

Additional Notes for Eligible HSIs from ED’s 2024 Eligibility Matrix

Certain institutions were manually added or corrected due to missing information; such instances are detailed in the following information.

- Manually added Dewey University–Hato Rey to the aggregate list of “eligible, not funded” and “funded” HSIs.
 - › Dewey University–Hato Rey was listed as “N/A” under “Meets the 2024 Title V HSI Definition,” but it was a “Current Grantee” under the “Open HSI Grant” column and marked as “Yes” under “PPOHA Eligible.”
- Manually added Notre Dame de Namur University to the aggregate list of “eligible, not funded” and “funded” HSIs.
 - › Notre Dame de Namur University was listed as “No” under “Meets the 2024 Title V HSI Definition,” but it was a “Current Grantee” under the “Open HSI Grant” column and marked as “Yes” under “PPOHA Eligible.”

- Manually corrected for missing institutional control and level based on IPEDS's institutional control and level for the following institutions:
 - › Lone Star College System–Montgomery
 - › Lone Star College System–Tomball
 - › Miami Dade College–North Campus
 - › Miami Dade College–Wolfson Campus
 - › Pima County Community College–East Campus
- Manually corrected for UnitIDs for the following institutions:
 - › Lone Star College System–Tomball
 - › Lone Star College System–Montgomery

ED's 2024 Eligibility Matrix and 2022–23 IPEDS Merge

Zip Codes

- Zip codes were based on the 2022–23 IPEDS zip code variable. However, in three cases, the zip codes were manually added due to missing data: Cuesta College, San José State University, and the University of California, Merced.
- California's congressional districts ($N = 52$) were constructed by matching IPEDS zip codes with the subsequent congressional district indicated within the State of California Senate Office of Demographics' [Zip Code Directory](#) in 2023–24.
- All IPEDS zip codes matched except for Holy Names University in Oakland, California, which has since closed (Holy Names University 2022). Holy Names University's zip code was manually added for the congressional district analysis. In short, the final reported number includes defunct institutions (i.e., Holy Names University) if they were included within the U.S. Department of Education's eligibility matrix.

Fall Enrollment for Eligible HSIs, 2024

- Eight HSIs had missing fall enrollment data with the initial IPEDS download:
 - › Alliance University¹⁸
 - › Altierus Career College–Bissonnet
 - › Altierus Career College–Norcross
 - › American University of Puerto Rico–Bayamon
 - › American University of Puerto Rico–Manati
 - › Holy Names University
 - › Notre Dame de Namur University¹⁹
 - › Union Institute & University²⁰

With the exception of Notre Dame de Namur University, the fall enrollment of these institutions was subsequently located via IPEDs and merged with the rest of the data.

¹⁸ Alliance University closed in August 2023 (MSCHE 2023).

¹⁹ Notre Dame de Namur University's undergraduate school closed, and the university transitioned to focus on graduate programs in 2021 (Golden, n.d.).

²⁰ Union Institute & University closed in June 2024 (Moody 2024).

Carnegie Classifications for Eligible HSIs in California, 2024

Basic Classifications were pulled from 2022–23 IPEDS, which uses Carnegie’s 2021 Basic Classifications. For clarity, we use the following aggregated classifications: (a) associate colleges, (b) baccalaureate colleges, (c) doctoral/professional universities, (d) master’s colleges and universities, and (e) special focus institutions. We provide additional details:

- The reported count of associate colleges ($N = 36$) in California represents an aggregate unduplicated count of the following Basic Carnegie Classifications:
 - › Associate Colleges: High Career and Technical-High Nontraditional
 - › Associate Colleges: High Career and Technical-High Traditional
 - › Associate Colleges: High Career and Technical-Mixed Traditional/Nontraditional
 - › Associate Colleges: High Transfer–High Nontraditional
 - › Associate Colleges: High Transfer–High Traditional
 - › Associate Colleges: High Transfer–Mixed Traditional/Nontraditional
 - › Associate Colleges: Mixed Transfer/Career and Technical–High Nontraditional
 - › Associate Colleges: Mixed Transfer/Career and Technical–High Traditional
 - › Associate Colleges: Mixed Transfer/Career and Technical–Mixed Traditional/Nontraditional
- The reported count of baccalaureate colleges ($N = 5$) represents an aggregated unduplicated count of three Basic Classifications:
 - › Baccalaureate Colleges: Arts and Sciences Focus
 - › Baccalaureate/Associate’s Colleges: Associate Dominant
 - › Baccalaureate Colleges: Diverse Fields
- The reported count of doctoral or professional universities ($N = 15$) represents an aggregate unduplicated count of three doctoral- and professional-level Basic Classifications:
 - › Doctoral Universities: Very High Research Activity
 - › Doctoral Universities: High Research Activity
 - › Doctoral/Professional Universities
- The reported count of master’s colleges and universities ($N = 10$) represents an aggregate unduplicated count of three Basic Classifications:
 - › Master’s Colleges and Universities: Larger Programs
 - › Master’s Colleges and Universities: Medium Programs
 - › Master’s Colleges and Universities: Small Programs
- The reported count of special focus institutions ($N = 5$) represents an aggregate unduplicated count of four Basic Classifications:
 - › Special Focus Four-Year: Faith-Related Institutions
 - › Special Focus Four-Year: Business and Management Schools
 - › Special Focus Four-Year: Other Health Professions Schools
 - › Special Focus Two-Year: Health Professions

Table A1. Dual- and Multi-Designated Eligible HSIs in California, by Congressional Districts: 2024

District Name	District Label	AANAPISI– HSI	AANAPISI– HSI–PBI	ANNHSI– HSI– NASNTI	HBCU–HSI	HSI– NASNTI	HSI–PBI	Total
Congressional District 1	CD 01	0	0	0	0	0	0	0
Congressional District 2	CD 02	1	0	0	0	0	0	1
Congressional District 3	CD 03	1	0	0	0	0	0	1
Congressional District 4	CD 04	1	0	0	0	0	0	1
Congressional District 5	CD 05	1	0	0	0	0	0	1
Congressional District 6	CD 06	1	0	0	0	0	0	1
Congressional District 7	CD 07	2	0	0	0	0	0	2
Congressional District 8	CD 08	2	0	0	0	0	0	2
Congressional District 9	CD 09	2	0	0	0	0	0	2
Congressional District 10	CD 10	3	0	0	0	0	0	3
Congressional District 11	CD 11	0	0	0	0	0	0	0
Congressional District 12	CD 12	3	0	0	0	0	0	3
Congressional District 13	CD 13	1	0	0	0	0	0	1
Congressional District 14	CD 14	5	0	0	0	0	0	5
Congressional District 15	CD 15	1	0	0	0	0	0	1
Congressional District 16	CD 16	4	0	0	0	0	0	4
Congressional District 17	CD 17	3	0	0	0	0	0	3
Congressional District 18	CD 18	2	0	0	0	0	0	2
Congressional District 19	CD 19	2	0	0	0	0	0	2
Congressional District 20	CD 20	1	0	0	0	0	0	1
Congressional District 21	CD 21	1	0	0	0	0	0	1
Congressional District 22	CD 22	0	0	0	0	0	0	0
Congressional District 23	CD 23	1	0	0	0	0	0	1
Congressional District 24	CD 24	1	0	0	0	0	0	1
Congressional District 25	CD 25	0	0	0	0	0	0	0
Congressional District 26	CD 26	0	0	0	0	0	0	0
Congressional District 27	CD 27	1	0	0	0	0	0	1
Congressional District 28	CD 28	1	0	0	0	0	0	1
Congressional District 29	CD 29	0	0	0	0	0	0	0
Congressional District 30	CD 30	2	0	0	0	0	0	2
Congressional District 31	CD 31	1	0	0	0	0	0	1
Congressional District 32	CD 32	2	0	0	0	0	0	2
Congressional District 33	CD 33	0	0	0	0	0	0	0
Congressional District 34	CD 34	2	0	0	0	0	0	2
Congressional District 35	CD 35	0	0	0	0	0	0	0
Congressional District 36	CD 36	0	0	0	0	0	0	0
Congressional District 37	CD 37	0	0	0	0	0	0	0
Congressional District 38	CD 38	2	0	0	0	0	0	2
Congressional District 39	CD 39	1	0	0	0	0	0	1
Congressional District 40	CD 40	1	0	0	0	0	0	1

District Name	District Label	AANAPISI– HSI	AANAPISI– HSI–PBI	ANNHSI– HSI– NASNTI	HBCU–HSI	HSI– NASNTI	HSI–PBI	Total
Congressional District 41	CD 41	2	0	0	0	0	0	2
Congressional District 42	CD 42	1	0	0	0	0	0	1
Congressional District 43	CD 43	2	0	0	0	0	1	3
Congressional District 44	CD 44	1	0	0	0	0	0	1
Congressional District 45	CD 45	2	0	0	0	0	0	2
Congressional District 46	CD 46	2	0	0	0	0	0	2
Congressional District 47	CD 47	4	0	0	0	0	0	4
Congressional District 48	CD 48	0	0	0	0	0	0	0
Congressional District 49	CD 49	0	0	0	0	0	0	0
Congressional District 50	CD 50	1	0	0	0	0	0	1
Congressional District 51	CD 51	3	0	0	0	0	0	3
Congressional District 52	CD 52	1	0	0	0	0	0	1
Total		71	0	0	0	0	1	72

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