## Minority Serving Institutions under Trump's presidency: Considerations for current policies and future actions

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### Introduction

Minority Serving Institutions (MSIs) are a critical group of postsecondary institutions in the nation that have secured federal appropriations since the first iteration of the Higher Education Act of 1965 because of their role in educating groups of students often left behind. MSIs continue to be underserved in their efforts to secure federal funding that support their work. I address two goals in this brief, both of which are undergirded by the premise that there is much to learn about our current and future postsecondary system through a deeper understanding of MSIs

First, I offer an overview of the various legislative decisions that have supported Minority Serving Institutions. As I underscore throughout the first section of this brief, the various legal interventions that gave rise to what we now collectively call MSIs represents the accumulation of incremental efforts, albeit imperfect, to redress a systemically inequitable postsecondary field. Alongside this legislative history, I also offer evidence from an increasingly robust body of educational scholarship that centers MSIs as a unit of analysis. This work is critical in advancing a more nuanced appreciation for both the opportunities and current challenges faced by these institutions. Indeed, what these works suggest is that the importance of MSIs extends beyond the way these institutions can support their own students.

Second, I offer evidence showing how—despite a public rhetoric of support for some MSIs—the current executive branch of our government has attempted to curtail appropriations for these institutions without offering compelling evidence to justify these choices. When read in concert with other papers commissioned for this Civil Rights Project/Proyecto Derechos Civiles summit, this particular brief underscores the growing chasm between current political speech that purports to offer equitable educational choices for students' gainful success and the opposing realities evidenced in current legislative proposals. These proposed actions would disproportionately and negatively affect MSIs, a cluster of institutions that offer valuable postsecondary preparation for the majority of low-income students of color currently enrolled in colleges and universities in the United States.

Despite the chronic histories of state and federal underfunding and the pernicious effects of hostile societal environments for youth of color, many MSIs continue to do a promising job of supporting students to degree completion, achieving future gainful employment and participating in meaningful civic opportunities (Conrad & Gasman, 2015; Espinosa, Turk & Taylor, 2017; Espinosa, Kelchen & Taylor, 2018l; Gasman, Spencer & Orphan, 2015). As such, MSIs do, indeed, have much to share with all institutions of higher education. Thus, MSIs can serve as the starting point to explore promising practices to better support the very students that decades of scholarship remind us have been least supported by our education system; students whose intersecting racial, ethnic, socioeconomic, migrant, sexual, and gender identities have been consistently minoritized through exclusionary educational practices (Nguyen, Castro Samayoa, Mobley & Gasman, 2018).

Both the U.S. House of Representative and Senate's committees for appropriations have categorically dismissed the executive branch's proposed request to decrease discretionary support for MSIs. Though this rebuff may provide a short-term reprieve on current leadership's impact on MSIs and their students, it nonetheless underscores the need to adequately understand why bolstering support for MSIs is not only morally just, but also a sound investment towards improving our postsecondary system.

# Section I. Why Use Minority Serving Institutions as a Unit of Analysis to Understand Our Country's Higher Education Landscape?

Legislators, policy analysts, and educational researchers alike are familiar with categorizing our nation's colleges and universities in particular dyads: public/private, two-year/four-year, rural/urban, open-enrollment/selective, for-profit/non-profit. All of these descriptors are meaningful ways of understanding a richly complex landscape of postsecondary organizations, though these approaches to clustering institutions of higher education (IHE) may not always tell us what students' experiences are like within IHEs. What, then, might we learn about our current postsecondary system if we encouraged a starting point that centers students of color's presence on these campuses?

This study offers one answer to this question by focusing on Minority Serving Institutions (MSIs) as a valuable taxonomy to understand higher education in the United States, and to explore how the current executive branch seeks to support (or not) students in the postsecondary system. Centering MSIs in our analysis enables us to meaningfully explore how we can work towards systematically improving our postsecondary education system to better support low-income students of color (Castro Samayoa & Gasman, *in press*). For one, focusing on MSIs allows us to ask different questions about our nation's colleges and universities by explicitly acknowledging how these institutions were built on *de jure* racial segregation and emerged within a legal framework that limited people of color's access to just educational opportunities (Wilder, 2014). Indeed, the inequitable foundations of our postsecondary landscape help us to understand how current policies claiming to be invested in every student's success are only truthful to the extent that we also confront these institutions' tarnished histories.

We are (and have been, for some time) in the midst of a political climate where colleges have fought to defend their right to consider race as one of several factors in holistic admission processes (Horn, Marin, Garcés, Miksch, Yun, 2018). In this context, we can benefit from better understanding how specific institutions strive to improve learning conditions for students whose experiences have most often been devalued within educational spaces. In effect, an increasing *de facto* resegregation of our K-12 system is well underway, coupled with rife inequities in funding for those in the public sector (U.S. Commission on Civil Rights, 2018). Purposeful efforts to amplify postsecondary institutions' work to support diverse student bodies is critical in any attempt to steward consistent progress towards more just educational opportunities in this country.

### Section II. Understanding the Emergence and Importance of MSIs

Though current federal appropriations for Minority Serving Institutions emerged from amendments introduced across multiple ratifications of the 1965 Higher Education Act (HEA), some of these institutions' founding precede the HEA by over a century. Specifically, Historically Black Colleges & Universities date their origins to the latter part of the 19<sup>th</sup> century (primarily between the late 1860s and early 1900s) during a time when racial segregation prohibited any opportunities for access to (higher) education for Blacks in 17 states. The passing of a second Morrill Land Grant Act in 1890 offered a framework for states to establish land-grant institutions for Blacks in states with segregated education systems. The uncoordinated efforts that followed the second land grant anticipated the "separate but equal" mentality of racial separation upheld by the Supreme Court six years later in Plessy v. Ferguson (1896).

Hardly equal in the apportioning of resources for infrastructure development since their inception, colleges with an expressed mission to support the education and development of Blacks formally received targeted funding through the 1986 Higher Education Amendments<sup>1</sup>. Further support for Historically Black Colleges & Universities has also been established to support particular Graduate programs within HBCUs.<sup>2</sup> Unlike other MSIs, HBCUs have also received federal support for a Capital Financing Program under the 1992 amendments to the HEA.<sup>3</sup> Passing of this legislation was a congressional attempt to recognize the difficulties for HBCU campuses to support the maintenance of academic and residential facilities because of "their small enrollments, limited endowments, and other financial risk factors" (Hegji, 2017, p. 26). In the states with a history of segregation by law, the states were required by the Civil Rights Act to develop plans to integrate their higher education systems in the 1970s.

Given that support for HBCUs is limited to institutions that were founded prior to 1964 with the intent to educate Blacks, Predominantly Black Institutions (PBIs) programs support IHEs with high enrollments of Black students that may not meet HBCU eligibility criteria. First authorized in 2007 by the College Cost Reduction and Access Act (CCRAA)<sup>4</sup>, PBIs are institutions that have a low educational and general expenditures, enroll at least 40% Black students and financially needy students, with at least 1,000 students.

As a response to the shifting demographics within postsecondary educations and in tandem with political lobbying from organizations like the Hispanic Association of Colleges & Universities (HACU), Hispanic Serving Institutions were first recognized in congressional legislation in the 1992 amendments to the HEA<sup>5</sup>. The reauthorization of the HEA six years later, in 1998, offered an opportunity for Congress to recognize "the importance of finding new ways of serving our Nation's rapidly growing Hispanic community, [Congress] has created a new part within Title V dedicated solely to supporting the needs of Hispanic-Serving Institutions" (as cited in Hegji, 2017, p. 35). Institutions that enroll at least 25% of Hispanic-identifying students within their undergraduate body and meet required enrollment of financially needy students are

<sup>&</sup>lt;sup>1</sup> P.L. 99-498 under Title III-Part B

<sup>&</sup>lt;sup>2</sup> Title VII, Part A, Subpart 4, of the HEA under the HEAO; P.L. 110-315; Section 326 of HEA.

<sup>&</sup>lt;sup>3</sup> P.L. 102-325

<sup>&</sup>lt;sup>4</sup> P.L. 110-84

<sup>&</sup>lt;sup>5</sup> P.L. 102-325

eligible for these grants. In 2008, through the Higher Education Opportunity Act<sup>6</sup>, Congress also established the Promoting Postbaccalaureate Opportunities for Hispanic Americans (PPOHA) which aims to support Hispanic students in graduate programs.

An attempt to recognize the specific needs of Asian Americans & Pacific Islanders through the Asian American Native American Pacific Islander Serving Institution (AANAPISI) designation was first proposed in 2002 by Robert Underwood in H.R. 4825. However, AANAPISIs were not authorized until 2007 under the CCRAA<sup>7</sup>. In addition to meeting requirements under HEA Section 312(b), IHEs wishing to receive AANAPISI funds must also enroll at least 10% Asian American or Native American Pacific Islander students within their undergraduate student population.

Recognition for the dispossession of indigenous lands and the specific needs of indigenous peoples' educational needs were recognized in the 1998 amendments of the HEA through the Strengthening American Indian Tribally Controlled Colleges & Universities Program (TCCU). Notably, though, Tribal Colleges had already been established decades prior, with Diné College first founded in 1968 under the auspices of the Indian Civil Rights Act of 1968 (Gasman, Nguyen & Conrad, 2015). In recognition of institutions that enroll Native American students but are not governed by indigenous leadership, the Strengthening Native American-Serving, Nontribal Institutions (NASNTIs) program was first authorized in 2007 under the CCRAA.

## Section III. A Current Snapshot of Minority Serving Institutions

Given the varied legislative contexts that have supported institutions serving low-income students of color, the number of IHEs receiving federal support under the MSI designation varies every year. The Office of Postsecondary Education (OPE) invites IHEs to submit materials to determine their eligibility for the various competitive grants offered through federal appropriations. The most recent Eligibility Matrix (2018) offers the following figures for institutional eligibility under the various grants earmarked for MSIs (see Table III.1):

Table III.1. Snapshot of Institutions' Status for MSI Grants for FY2018

	Potentially Eligible for Grant (Need a Waiver Request)	Eligible to Apply for Program Grants	Current Program Grantees		
AANAPISI	168	93	11		
AANAPISI-F	161	101	14		
ANNH	8	11	11		
ANNH-F	10	13	10		
HBCU	0	0	97		
HBCU Masters	0	0	18		
HBGI	0	0	24		
HSI Elig	53	244	154		
HSI Stem	74	308	88		
MSEIP	113	394	26		
NASNTI	10	14	6		
NASNTI-F	12	16	6		
PBI Comp	6	77	24		
PBI Mand	10	54	12		
PBI Masters	0	17	0		
PPOHA	12	110	17		
SIP	1,250	1,327	179		
TCCU	0	0	34		

<sup>&</sup>lt;sup>6</sup> P.L. 110-315

<sup>&</sup>lt;sup>7</sup> P.L. 110-85

The eligibility matrix shows how Tribally Controlled Colleges & Universities (TCCUs) and Historically Black Colleges & Universities (HBCUs) are fixed in their institutional counts across fiscal years given the specific language used to determine their eligibility. Similarly, some institutions may believe to be eligible for these grants given that they enroll particular proportion of students of color. However, the language for eligibility also notes that institutions must also demonstrate relatively low educational and general expenditures (E&GE) alongside their enrollment of financially needy students of color. When institutions do not automatically meet eligibility criteria for E&GE and enrollment of needy students, they are deemed partially eligible and must request a waiver from OPE for consideration for these funds.

However, only looking towards an institution's eligibility does not consider the difficulties that IHEs also face in procuring these competitive federal funds, given the stipulations that would prevent them from securing grants targeted for multiple ethnoracial populations. As Table III.2. shows (next page), IHEs are selectively eligible for multiple grants depending on whether they hold concurrent grants disbursed by other MSI programs. The potential MSI 'dual-designation' has posed an issue for IHEs as it animates competition between initiatives meant to support different groups of ethnoracial students within a specific campus (Yang & Masulit, 2018). As discussed below, one of the current federal proposals under executive leadership seeks to remedy this issue, altogether doing away with certain competitive MSI grants for the sake of efficiency. To date, the executive branch has not offered evidence to support how such a proposal would prevent further entrenchment of already inequitable educational outcomes by race and ethnicity.

<sup>&</sup>lt;sup>8</sup> Note that Howard University in Washington, D.C. is not included within the HBCU count in the Eligibility Matrix 'HBCU' category given that it was federally chartered in 1867 (20 U.S.C. 121 et seq.; 20 U.S.C. 128). An endowment for the University was also authorized in FY 1985 under Title II, P.L.98-480.

<sup>&</sup>lt;sup>9</sup> The Strengthening Institutions Program (SIP), is an exception to this categorization and often not considered within MSI scholarship, given that it supports institutions that serve a high percentage of low-income students alongside a relatively low E&GE regardless of their enrollment of students of color. Support for institutions under SIP has been available through the original Higher Education Act in 1965 (P.L. 89-329, §301).

# Section IV. Following the money: Examining the promise of support for Minority Serving Institutions

When Donald J. Trump and leaders of Historically Black Colleges & Universities met at the White House in February, 2017, media outlets covered the event as a historic moment that could signal increased support for HBCUs and other MSIs under his presidency (Douglas-Gabriel, 2017). At the gathering, Trump signed an executive order to move the White House Initiative on HBCUs from the Department of Education to the White House. Since the passing of the Executive Order in early 2017, however, the White House has played a role in attempting to undermine funding for HBCUs and other MSIs rather than supporting them.

Given that MSIs receive funds for competitive and mandatory grants through federal appropriations established every fiscal year, insights into current leadership's attitudes to MSIs can be gleaned from a scrutiny of how MSIs are proposed to be funded. Indeed, the scholarship on MSIs has demonstrated that securing funds through these various federal appropriations are critical to MSIs' ability to steward academic, administrative, and infrastructure improvements in the service of their students' development (Gasman, Castro Samayoa, Boland, & Esmieu, 2018). This section details the differences in funding from the past three fiscal years for MSIs as one way of understanding the changing tide of support for MSIs despite the public rhetoric alleging support for them.

In President Obama's last request to support MSIs for the FY2017 budget, both congressional Committees on Appropriations conferred the funds requested by the executive branch (see Table IV.1). Notably, however, both of these committees did not offer support for a new MSI Innovation Fund. In its rejection of this request, the House of Representatives' Committee on Appropriations added that it "continue[d] to support HBCUs and Minority-Serving Institutions through Aid for Institutional Development, and support[ed] efforts to improve college access and completion at these and other institutions through increased funding for TRIO programs." <sup>10</sup>

In Donald J. Trump's budget request during his first year in the White House, every single program for MSIs had a reduced budget, totaling close to \$95 million in proposed cuts (see Table IV.2). The largest requested reduction for a single program was for the Strengthening Historically Black Colleges fund (\$465,000). Of note, an Executive Order from the White House on Historically Black Colleges released later on would incorrectly assert that "President Donald J. Trump prioritizes Historically Black College & Universities" (2018).

The final congressional appropriations bill, however, increased the funding for the Strengthening Historically Black Colleges program by almost \$35 million, to \$279,624,000 in FY 2018 from the preceding FY 2017's \$244,694,000. Indeed, every single program for MSIs also received a larger appropriation than what was requested in the proposed presidential budget. Most notably, the president's request to altogether undo the Strengthening Institutions Program (SIP) was not supported by either of the congressional Committees on Appropriations.

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<sup>&</sup>lt;sup>10</sup> H. Rep. 114-699, at 142, 2016; this fund has been incorporated in language within H.R. 6543, *Aim Higher Act*, a bill to reauthorize the HEA.

In February 2018, the White House released *An American Budget*, its most recent budget request for FY 2019. Like its request from the previous year, it also aimed to reduce funds for MSIs, except this time it sought to achieve a substantive change in the existence of MSI grants. In its prose, the White House claimed to

provide \$501 million for Historically Black Colleges and Universities (HBCUs), Minority Serving Institutions (MSIs), and Hispanic-Serving Institutions (HSIs) through the HEA Title III and V programs to help close gaps among racial and socioeconomic groups in college enrollment and degree attainment by improving these institutions' academic programs, institutional capacity and student support services.

("A New Foundation for American Greatness", 2018, p. 2)

The presidential vision aspired to make the "Department [of Education] more efficient while reducing the federal role in education." In particular, this vision for renewed efficiency sought to consolidate a variety of funding sources for Minority Serving Institutions. The budget overview stated that it could achieve greater efficiencies by "merging six duplicative HEA Title III and V competitive grant authorities into a single institutional formula" (FY 2019 President's Budget, 2018, p. 11). The proposal suggested consolidating \$30.4 million from the current Aid for Institutional Development (Title III) with \$117.5 million from the Aid for Hispanic-Serving Institutions (Title V), claiming that these measures were implemented with the spirit of simplifying "the grant allocation process and redundant activities, improving alignment between Federal resources and need" (Fiscal Year 2019 Budget, p. 41).

Unacknowledged in this change, however, was the fact that the reduction of specific funds for various types of MSIs in favor of a "formula-based allocation," did not provide evidence of what would be the criteria for consideration within these new formula-based allocations (p. 43). Indeed, these attempts to curtail federal funds to support initiatives geared to low-income students of color were evidenced throughout the budget. Other unfounded claims, for example, criticized the "limited evidence of effectiveness" for programs, like the McNair, and thus proclaimed that these initiatives "could be supported with other resources, including through State and institutional funding" (p. 39). On the contrary, peer-reviewed evidence (Posselt & Black, 2012; Wilson & Gibson, 2011) suggests that McNair and others offer opportunities for students to develop valuable competencies and skills. The argument that programs, like McNair, are beyond the scope of federal resources belies the articulated commitment to advancing opportunities for students of color as expressed in the rhetoric used by the current executive leadership.

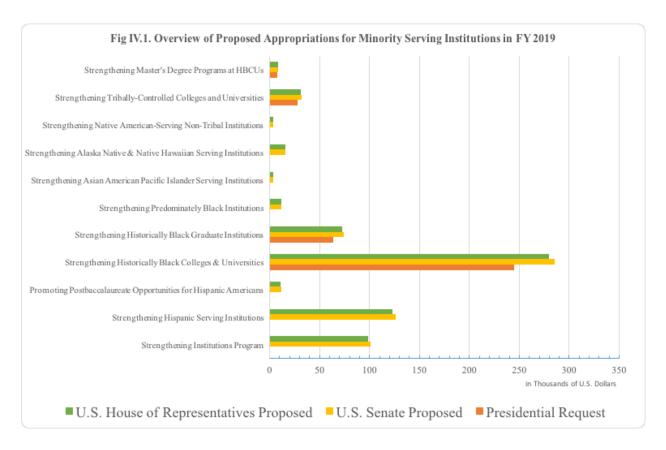
For consistency in displaying the information from prior FYs, Table IV.3 shows the current proposed funding. Notably, both the Senate's and House of Representatives' committees on Appropriations have dismissed the presidential request to consolidate grants for MSIs. In fact, the Senate report supported increases beyond FY 2018's appropriations for all MSI programs, though this level of support was not endorsed within the House of Representatives (see Fig. IV.1).

Table IV.3. Overview of Proposed Appropriations for Minority Serving Institutions in FY2019

Authorizing Legislation	Name of Grant	Presidential Request	U.S.	Senate Proposed	U.S. House of Pepresentatives Proposed
HEA Part III-A	Strengthening Institutions Program	\$ -	\$	101,067	\$ 98,886
HEA Part V-A	Strengthening Hispanic Serving Institutions	\$ -	\$	125,898	\$ 123,183
HEA Part V-B(512)	Promoting Postbaccalaureate Opportunities for Hispanic Americans	\$ -	\$	11,296	\$ 11,052
HEA Part III-B-323	Strengthening Historically Black Colleges & Universities	\$ 244,694	\$	285,788	\$ 279,624
HEA Part III-B-326	Strengthening Historically Black Graduate Institutions	\$ 63,281	\$	73,908	\$ 72,314
HEA Part III-A-318	Strengthening Predominately Black Institutions	\$ -	\$	11,611	\$ 11,361
HEA Part III-A-320	Strengthening Asian American Pacific Islander Serving Institutions	\$ -	\$	3,910	\$ 3,826
HEA Part III-A-317	Strengthening Alaska Native & Native Hawaiian Serving Institutions	\$ -	\$	16,120	\$ 15,772
HEA PartIII-A-319	Strengthening Native American-Serving Non-Tribal Institutions	\$ -	\$	3,910	\$ 3,826
HEA Part III-A-316	Strengthening Tribally-Controlled Colleges and Universities	\$ 27,599	\$	32,234	\$ 31,539
HEA Part VII A-4-723	Strengthening Master's Degree Programs at HBCUs	\$ 7,500	\$	8,760	\$ 8,571
	Subtotal for Institutional Aid	\$ 343,074	\$	674,502	\$ 659,954

(HEA = Higher Education Act; in Thousands)

Sources: S. Rep 115-289, at 202 (2018); H. Rep. 115-862, at 150 (2018); Presidential FY 2019 Budget Summary and Background Information; Presidential FY 2019 Budget Request for Higher Education



The current discrepancies across both congressional Committees on Appropriations and the presidential requests for FY 2019 point to the inconsistent vision for federal programs seeking to support students of color, not just within MSIs, but also across other programs geared to support low-income students of color throughout their educational trajectories. For example, both the House of Representatives' Committee on Appropriations and the Senate Committee of Appropriations, respectively, caution DOE's unwarranted changes to programs like TRIO. The presidential request to streamline TRIO programs from a competitive grant into a single State formula program was rejected on grounds that "the Department was unable to provide any

information on the details of how the formula grant would be implemented or how accountability for performance would be maintained" Similarly, the Senate's Committee on Appropriations stated it "is concerned with the level of burden TRIO grantees and first-generation students face in documenting their income to meet the definition of 'low-income individual' as required under section 401A(h)(4) of the HEA"<sup>12</sup>.

### Section V. A brief note on institutional accountability and MSIs

As other briefs in this series note, efforts to do away with Public Service Loan Forgiveness alongside accountability measures for institutions whose students have difficulty paying loans directly affect the future success of students of color. Others have already cautioned that institutions that serve "disadvantaged students may not have sufficient resources to improve repayment outcomes," yet the scant details on how these measures of accountability will be implemented offer little evidence disproving that they will not inequitably affect MSIs (Chou, Looney & Watson, 2018, p. 19). Said simply: the vestiges of inequitable support for MSIs must be addressed if we are to then hold them to the same accountability standards that presume a "traditional" student as those served by other institutions. For further discussion of this issue see paper by Nicholas Hillman in this collection.

In tandem to these concerns, federal oversight to support institutions who are recipients of MSI grants has dwindled. The current hiring freeze compounded by multiple early retirements and staff reallocations has left the federal Office of Postsecondary Education with leaner human capital than what is needed to ensure proper management. OPE's staff is charged with the oversight of IHEs who receive MSI grants. The disconnect between a call for greater accountability is mismatched with the staffing support offered to ensure that current grantees have the necessary support to make the most out the funding received through allocated appropriations. Notably, this is not an issue that is specific to programs supporting MSIs; rather it is emblematic of broader efforts from the current Secretary of Education to reduce federal oversight of equitable educational opportunities through staff reductions and rescinding federal guidance language (Balingit & Douglas-Gabriel, 2017).

### Section VI. Envisioning Next Steps & Agenda Setting

Drawing attention to the current divide between political speech and actions offers a fruitful opportunity to recalibrate forthcoming policy discussions. I conclude this brief by commenting on some of the potential opportunities afforded to MSIs by examining current proposed bills seeking to finally reauthorize the Higher Education Act. Both the Republicansponsored H.R. 4508, Promoting Real Opportunity, Success, and Prosperity through Education Reform Act [PROSPER] Act, and its Democratic counterpart, H.R. 6543, Aim Higher Act, would introduce meaningful departures from the current federal appropriations for MSIs. Even though the viability of success for both of these proposed bills is tempered by partisan divides, these bills, nonetheless, offer insights into what we can anticipate for MSIs' future under federal leadership. It behooves MSI leaders, policymakers, media, and researchers to understand these

<sup>&</sup>lt;sup>11</sup> H. Rep. 115-862, at 153

<sup>&</sup>lt;sup>12</sup> S. Rep. 115-289, at 205

potential changes to steward the conversation in directions that can better support MSIs' work through federal appropriations.

Donald J. Trump finally succeeded in signing his first major postsecondary legislation in late July 2018, over a year and a half after his election into the presidency. The relatively swift reauthorization of the Carl D. Perkins Career and Technical Education Act has been a telling development in understanding the direction of postsecondary initiatives under his administration. Most notably, it underscores the general support for measures that seek to expand opportunities for vocational preparation. Conflating vocational opportunities as a success to increase the participation of people of color in postsecondary education whitewashes a long history of differentiating 'tracks' in opportunities by race (Ainsworth & Roscigno, 2005).

Current congressional support for other proposed initiatives, like the Open Textbook Pilot first funded in the Consolidated Appropriations Act (2018), would benefit from looking to MSIs as institutions that can model what this might look like for other institutions. Paul Quinn College (PQC), a Historically Black College and the first urban work college in the nation (Castro Samayoa & Gasman, *in press*) would be one such institution. Faculty at PQC have already undertaken work seeking to increase the adoption of open-source resources specifically within MSI contexts (James, 2018).

The current Democratically-supported bill reintroduces language of further support for MSIs. For example, it reintroduces the MSI Innovation Fund which replicates a new source of funding for all MSIs, much like it had been proposed in Obama's FY2017 budget request. Of note, Representative Alma Adams (NC-12) had already introduced an amendment for an MSI Innovation fund to the proposed PROSPER Act, but was defeated by a 17-23 vote.

As other studies in this summit report, accountability measures within the PROSPER Act are particularly damaging for MSIs. Of note, the PROSPER Act would make MSI designation subject to an additional eligibility criterion: at least 25% graduation or transfer within 150% of the normal graduation time. Furthermore, the most recent development of the undoing of the Gainful-Employment Rules aligns with the retrenchment of federal oversight that will disproportionally affect students of color served by MSIs, as it primarily benefits the predatory tactics employed by for-profit institutions.

As documented in this analysis, the current Congress has, at best, maintained the status quo for MSIs' budgeting and rejected cuts proposed in the president's budget. In fact, however, anything but an increase of funding for MSIs represents a continued failure to adequately support MSIs and to offer real college opportunity to students of color and to close the deep persisting racial gaps in college completion.

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### **Appendix A. List of Common Acronyms**

**AANAPISI** Asian American and Native America Pacific Islander Serving Institutions

**ANNH** Alaska Native and Native Hawaiian Serving Institution

HBCU Historically Black Colleges & UniversitiesHBGI Historically Black Graduate Institutions

**HSI** Hispanic Serving Institutions

HSI-STEM Hispanic Serving Institutions - Science, Technology, Engineering, and MathMDHBCU Master's Degree Programs at Historically Black Colleges & Universities

MSEIP Minority Science and Engineering Improvement Program

**NASNTI** Native American Serving Non-Tribal Institutions

ANNH-NHSI Native Hawaiian Serving Institutions
PBI Predominantly Black Institutions

PBI-MA Master's Degree Programs at Predominantly Black Institutions
PPOHA Promoting Post Baccalaureate Opportunities for Hispanic Americans

**SIP** Strengthening Institutions Program

TCCU Tribally Controlled Colleges & Universities