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Research Article

# COVID-19, Asian American and Native American-Serving Institutions, and Minority-Serving Institutions:

## Examining Federal Funding from the Coronavirus Aid, Relief, and Economic Security Act and the Coronavirus Response and Relief Supplemental Appropriations Act

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### **ABSTRACT**

This article examines and interrogates the formulas used to determine funding at both the designation and institutional levels for Minority-Serving Institutions (MSIs) and Asian American and Native American Pacific Islander-Serving Institutions (AANAPISIs), in the Coronavirus Aid, Relief, and Economic Security (CARES) Act and the Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA); as well as general annual appropriations for MSIs and AANAPISIs. In doing so, the authors aim to facilitate a greater understanding of the current AANAPISI funding landscape, while providing policy makers with new insights and implications to ensure greater equity in future appropriations for AANAPISIs and MSIs. Results indicate that AANAPISIs are severely underfunded, particularly given their large enrollment of Asian American and Pacific Islander students and high number of institutions that meet AANAPISI eligibility.

## **INTRODUCTION**

As colleges and universities are confronted with new challenges during the COVID-19 pandemic, the federal government provided financial resources to support postsecondary institutions. With the passage of the Coronavirus Aid, Relief, and Economic Security (CARES) Act, and more recently the Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA), higher education institutions received direct funding from the U.S. Department of Education to support their students and their ongoing operations. More specifically, institutions can use these federal funds to award “financial aid grants to students, student support activities, and to cover a variety of institutional costs, including lost revenue, reimbursement for expenses already incurred, technology costs associated with a transition to distance education, faculty and staff trainings, and payroll” (U.S. Department of Education, 2021a, para. 3).

Within both the CARES and CRRSAA were dedicated provisions that provided funding specifically for Minority-Serving Institutions (MSI), including for Asian American Native American Pacific Islander-Serving Institutions (AANAPISI). In this article, we examine and interrogate the formula used to determine funding at both programmatic and institutional levels for AANAPISIs and MSIs, in both statutes; as well as general annual appropriations for MSIs and AANAPISIs. In doing so, we aim to facilitate a greater understanding of current AANAPISI policy, while providing policy makers with new insights and implications to ensure greater equity in future appropriations for AANAPISIs and MSIs.

## **MSIS AND AANAPISIS**

MSIs are an integral part of the U.S. higher education system that typically, but not exclusively, serves low-income students of color. MSIs are rooted in our country’s history of racial inequity and injustice, namely Historically Black Colleges and Universities as well as Tribally Controlled Colleges and Universities, but contemporarily provide culturally relevant support and programming for all students, with a focus on students of color. Managed by the U.S. Department of Education, MSIs meet specific benchmarks based on mission or enrollment of students of color defined by the Higher Education Act of 1965, as amended. Today, there are eleven federally established MSI designations that include:

- Alaska Native and Native Hawaiian-Serving Institutions (ANNHSI)
- Asian American and Native American Pacific Islander-Serving Institutions (AANAPISI)
- Hispanic-Serving Institutions (HSI)
- Hispanic-Serving Institutions STEM (HSI STEM)
- Historically Black Colleges and Universities (HBCU)
- Historically Black Colleges and Universities Graduate Institutions (HBGI)
- Historically Black Colleges and Universities Masters Institutions (HBCU Masters)
- Native American-Serving Nontribal Institutions (NASNI)
- Predominantly Black Institutions (PBI)
- Promoting Postbaccalaureate Opportunities for Hispanic Americans (PPOHA)
- Tribally Controlled Colleges and Universities (TCCU)

Established in 2007 under the College Cost Reduction Act, AANAPISIs are colleges and universities that meet federally constructed eligibility requirements. Specifically, an institution must (1) maintain at least a 10 percent Asian American and Pacific Islander (AAPI) undergraduate population, and (2) meet Section 312(b) of the Higher Education Act's basic eligibility criteria of Title III and V programs. This requirement is often understood as "enrolling a significant proportion of low-income students and maintaining a low average of educational and general expenditures" (Nguyen et al., 2021, 5–6).

Like other enrollment-based MSIs (i.e., ANNHSI, HSI, HSI STEM, NASNI, PBI, PPOHA) once an institution is federally recognized as meeting these requirements, it can then apply for the AANAPISI competitive grant. If awarded, funded AANAPISIs typically develop an AANAPISI program on campus where a host of academic and cocurricular programming is created support the educational success of AANHPI students (Teranishi, 2011).

Since 2007, some 217 institutions have been eligible for AANA-PISI funding (5.1 percent of all colleges and universities in the United States), where these AANAPISIs enroll nearly 40 percent of all AAPI undergraduates in the nation. A total of fifty AANAPISIs have received more than \$100 million in federal funding since the designation's establishment. Yet compared to other MSIs, AANAPISIs are some of the most chronically underfunded MSIs (Nguyen et al., 2020).

## CARES ACT AND CRRSAA

The CARES Act was passed by Congress on March 27, 2020, and appropriated \$2.2 trillion in stimulus aid across various sectors of the U.S. economy. Within this law, the Higher Education Emergency Relief Fund (HEERF I) allocated \$13.95 billion for higher education institutions, where a specific provision within HEERF provided \$890 million for MSIs. The CARES Act provided an extraordinary level of emergency aid to MSIs, where amounts were first determined for each MSI designation. More specifically, the CARES funding amount for a specific MSI designation was based upon the same ratio of proportional funding that MSIs received in their general annual appropriations from the Further Consolidated Appropriations Act of 2020 (Public Law 116–94). Thus, AANAPISIs received \$6.1 million or 0.7 percent of the total MSI provision within the CARES Act (Table 1).

Once CARES funding for each MSI designation was established, a second formula was used to determine how much funding each institution within a designation received. This formula was based upon two criteria: (1) the number of students receiving Pell Grants; and (2) the enrollment of full-time equivalent students (U.S. Department of Education, 2020a). More specifically, and within each designation, 75 percent of an institution’s funds were allocated based on the enrollment of full-time students receiving Pell Grants, whereas 25 percent of the allocation was based on full-time students not receiving Pell Grants (*ibid.*).<sup>1</sup> Students enrolled in virtual learning were excluded from this funding model (*ibid.*).

As the COVID-19 pandemic raged on, the federal government passed a second relief bill to provide additional emergency aid. The CRRSAA was signed into law on December 27, 2020, and authorized \$21 billion for higher education through a second Higher Education Emergency Relief Fund (HEERF II). Similar to the CARES Act, a provision within HEERF II provided specific funding for MSIs. These dollars were also allocated “proportionally based on the relative share of funding these programs received in the Further Consolidated Appropriations Act” for each MSI designation (U.S. Department of Education, 2021b). Larger than the CARES Act, CRRSAA provided \$1.38 billion in stimulus funding within its MSI provision, where \$9.96 million was allocated to AANAPISIs. And within an MSI designation, CRRSAA funding was distributed differently per institution, particularly between mission-based and enrollment-based MSIs. For example, of the funding appropriated per institution for

**Table 1. MSI Provision Funding and Annual Appropriations, by Designation**

	MSI CARES	MSI CRRSAA	Total COVID-19 MSI Funding	COVID-19 MSI Funding % of Total	Annual Appropriations (Parts A & F)	Annual Appropriations % of Total	COVID-19 Funding % of Annual Appropriation	CARES Allocation as a % of CRRSAA
ANNAPISI	\$ 6,122,501	\$ 9,959,734	\$ 16,082,235	0.7%	\$ 9,149,000	1.0%	176%	61.5%
ANNH	\$ 25,239,472	\$ 41,058,427	\$ 66,297,599	2.9%	\$ 32,435,000	3.6%	204%	61.5%
TCCU	\$ 50,469,300	\$ 82,100,567	\$ 132,569,867	5.8%	\$ 64,863,000	7.3%	204%	61.5%
NASNIT	\$ 6,122,501	\$ 9,959,734	\$ 16,082,235	0.7%	\$ 9,149,000	1.0%	176%	61.5%
HBCU	\$ 447,466,079	\$ 655,120,970	\$ 1,102,587,049	48.3%	\$ 404,777,000	45.4%	272%	68.3%
HBCI	\$ 115,719,948	\$ 20,081,727	\$ 135,801,675	5.9%	\$ 83,995,000	9.4%	162%	576.2%
HBCU Masters	\$ 13,716,386	\$ 188,246,583	\$ 201,962,969	8.8%	\$ 9,956,000	1.1%	2025%	7.3%
PBI	\$ 18,181,513	\$ 29,576,643	\$ 47,758,156	2.1%	\$ 27,312,000	3.1%	175%	61.5%
HSI	\$ 197,122,756	\$ 320,668,009	\$ 517,790,765	22.7%	\$ 143,081,000	16.0%	362%	61.5%
HSI/STEM	-	-	-	-	\$ 94,100,000	10.6%	-	-
PPOHA	\$ 17,686,918	\$ 28,772,065	\$ 46,458,983	2.0%	\$ 12,838,000	1.4%	362%	61.5%
HBCU Total (HBCU+HBCI+HBCU Masters)	\$ 576,902,413	\$ 863,449,280	\$ 1,440,351,693	61.1%	\$ 498,728,000	55.9%	289%	66.8%
HSI Total (HSI+HSI STEM+PPOHA)	\$ 214,809,674	\$ 349,440,074	\$ 564,249,748	24.7%	\$ 250,019,000	28.0%	226%	61.5%
Total, All Designations	\$ 897,847,374	\$ 1,385,544,459	\$ 2,283,391,533	100.0%	\$ 891,655,000	100.0%	25.6%	64.8%

Note: This does not include any HEERF allocations to MSIs from CARES or CRRSAA.

Source : U.S. Department of Education (2020c, 2021d, 2021e).

HBCUs: (1) 70 percent was awarded based on the number of full-time students receiving Pell Grants who were not enrolled exclusively in online courses before the pandemic; (2) 20 percent of the funds were awarded based on the number of full-time students who did not receive Pell Grants and were not enrolled exclusively in online courses before the pandemic; and (3) the remaining 10 percent of funds were awarded based on an endowment factor (U.S. Department of Education, 2021b).

For enrollment-based MSIs, like AANAPISIs, funds were distributed proportionally with three major considerations: (1) students receiving Pell Grants; (2) the number of students not enrolled exclusively in online courses before the pandemic; and (3) headcount and full-time status (U.S. Department of Education, 2021c). In accordance with Section 314(a)(1) of CRRSAA, 75 percent of the funds were distributed based on the number of students receiving Pell Grants who were not enrolled exclusively in online courses before the emergency, 23 percent of the funds were distributed based on non-Pell Grant-receiving students who were not enrolled exclusively in online courses before the pandemic, and the remaining 2 percent of funds were distributed based on the number of Pell Grant students who were enrolled exclusively in online learning before the emergency. Half of each amount (37.5 percent, 11.5 percent, 1 percent, respectively) was based on total enrollment, while the other half was based on full-time enrollment (FTE) (*ibid.*).

Finally, it is important to note that funding for enrollment-based MSIs through CARES and CRRSAA was very unique. Specifically, all institutions that met enrollment-based MSI eligibility requirements received COVID funding. As discussed previously, regular funding from the U.S. Department of Education for AANAPISI funds, and other enrollment-based MSI designations, is often through a competitive grant application. If selected for an award, the institution receives federal funding from the AANAPISI designation, typically lasting for a five-year cycle. However, CARES and CRRSAA provided funding for all institutions that met AANAPISI eligibility requirements, as well as for other enrollment-based MSI. In other words, many more institutions received MSI funding from CARES and CRRSAA, than they normally would during a traditional MSI grant application cycle.

## METHODOLOGY

### Variables and Analysis

Data used for this analysis came from the U.S. Department of Education’s Office of Postsecondary Education, which published individual lists of institutional allocations from CARES (U.S. Department of Education, 2020c) and CRRSAA (U.S. Department of Education, 2021d), as well as annual appropriations for MSIs (U.S. Department of Education, 2021e). Additional data on institutional characteristics and student enrollment came from the U.S. Department of Education’s Integrated Postsecondary Education Data System (IPEDS). A complete list of variables and data sources can be found in Appendix A.

CARES and CRRSAA allocation data were imported into Stata and merged with 2017–18 data from IPEDS by matching the OPEid variable (Appendix A). When OPEids were linked to more than one IPEDS campus, the correct institution was identified using the OPEid eligibility indicator and institution names. In several cases, OPEids listed on the allocation tables did not match IPEDS OPEids. In those instances, we researched the institution to determine the correct ID and manually matched the allocations to the correct institutional characteristics and student enrollment. Institutional sectors were determined using IPEDS control (public, for profit, nonprofit) and 2018 Carnegie Basic Classifications. Associate’s degree–dominant institutions were classified as two-year and mixed Carnegie institutions were classified as four-year institutions. Tribal institutions were classified as two- or four-year following the IPEDS level variable. Institutions not in the Carnegie universe were given the IPEDS level, and those that were “less-than-two-year” were reclassified as two-year institutions.

MSI designations with more than one award type (i.e., HBCU, HBGI, and HBCU Masters; HSI and HSI STEM) were summed together in most analyses. General HEERF I and HEERF II awards were not included in analyses of MSI-specific funding; these awards were only included when comparing MSIs to predominantly white institutions (PWIs). Per-student calculations of MSI allocations used undergraduate twelve-month academic year enrollment and approximated the target population for each MSI designation. HBGI and HBCU Masters institutions and allocations were excluded in per-student calculations. Target populations were defined to include:

- Black students at HBCUs and PBIs
- Latinx students at HSIs



- American Indian and Alaska Native students at TCCUS and NASNTIs
- Asian American, Native Hawaiian, and Pacific Islander students at AANAPISIs
- American Indian and Alaska Native students and Native Hawaiian and Pacific Islander students at ANNHSIs

Due to data limitations within IPEDS, actual funding per targeted population is slightly understated for NASNTIs and ANNHSIs, as each group's target population includes students that are not considered under the MSI eligibility guidelines. For example, per federal statute, only enrollment of Native Hawaiian students should count toward meeting ANNHSI eligibility. However, given that IPEDS does not disaggregate data, all Pacific Islanders are lumped together with Native Hawaiian students, for one Native Hawaiian and Pacific Islander (NHPI) racial category. Thus, Pacific Islanders, such as Tongans and Samoans, for example, are included in per-student calculations for ANNHSI target group funding.

### **Analysis**

After our dataset was constructed, we conducted a series of descriptive statistics and crosstabulations of all variables of interest across MSI designations. This included an examination of funding levels for AANAPISIs and other MSIs under CARES, CRRSAA, and annual appropriations (Tables 1 and 2); the distribution of funding for AANAPISIs and other MSIs compared to PWIs (Tables 3 and 4); and per-student funding at AANAPISIs and other MSIs (Table 5).

For the MSI to PWI comparisons, per-student calculations included both undergraduate and graduate students, and HBGI and HBCU Masters institutions were included in the MSI sample. Some institutions received awards from multiple MSI designations. Because the primary focus of this chapter is on AANAPISIs, when we analyzed funding for AANAPISIs separately from other designations, dual-designated institutions were coded as AANAPISIs. Similarly, institutions that received both mission- and enrollment-based awards (mostly HBCUs that received PBI funding) were considered mission-based only for this analysis.

### **Positionality**

We are researchers committed to interrogating educational policy and public funding of higher education through a critical lens. In doing

**Table 2. MSI Provision Funding from CARES and CRRSAA, by Designation**

	Institutions	Percent of All Institutions	Mean	Std. Dev.	Min Award	Max Award
AANAPISI	165	22%	\$ 97,468	\$ 106,004	\$ 495	\$ 482,229
ANNH	16	2%	\$ 4,143,600	\$ 5,413,470	\$ 353,434	\$ 23,100,000
TCCU	35	5%	\$ 3,787,710	\$ 2,159,821	\$ 1,842,046	\$ 10,800,000
NASNTI	29	4%	\$ 554,560	\$ 417,982	\$ 54,844	\$ 1,816,360
HBCU	99	13%	\$ 14,500,000	\$ 14,100,000	\$ 423,334	\$ 62,200,000
PBI	81	11%	\$ 589,607	\$ 947,689	\$ 3,612	\$ 7,789,009
HSI	428	58%	\$ 1,318,341	\$ 1,560,695	\$ 5,097	\$ 9,501,799
<b>Total</b>	<b>738</b>	<b>100%</b>	<b>\$ 3,094,026</b>	<b>\$ 7,084,934</b>	<b>\$ 495</b>	<b>\$ 62,200,000</b>

Note: This does not include any HEERF allocations to MSIs from CARES or CRRSAA.

Totals do not add up to 100 percent due to dual designation.

Source : U.S. Department of Education (2020c, 2021d).

**Table 3. Funding Allocations of MSIs and PWIs**

*HEERF and MSI Funding*

	% of Institution	CARES Total	CRRSAA Total	Total Allocations	Allocations per FTE	Allocations per Headcount
MSIs	14%	\$ 5,023,925,911	\$ 9,130,490,479	\$ 14,154,416,390	\$ 3,107	\$ 1,748
PWIs	86%	\$ 8,381,175,968	\$ 12,776,831,172	\$ 21,158,007,140	\$ 1,839	\$ 1,202
<b>Total</b>	<b>100%</b>	<b>\$ 13,405,101,879</b>	<b>\$ 21,907,321,651</b>	<b>\$ 35,312,423,530</b>	<b>\$ 2,198</b>	<b>\$ 1,374</b>

*HEERF Only*

	% of Institution	CARES HEERF	CRRSAA HEERF	Total Allocations	Allocations per FTE	Allocations per Headcount
MSIs	14%	\$ 4,126,078,535	\$ 7,744,946,317	\$ 11,871,024,852	\$ 2,605	\$ 1,466
PWIs	86%	\$ 8,381,175,968	\$ 12,776,831,172	\$ 21,158,007,140	\$ 1,839	\$ 1,202
<b>Total</b>	<b>100%</b>	<b>\$ 12,507,254,503</b>	<b>\$ 20,521,777,489</b>	<b>\$ 33,029,031,992</b>	<b>\$ 2,056</b>	<b>\$ 1,285</b>

Source : U.S. Department of Education (2020c, 2021d, 2021e).

**Table 4. Funding Allocations of AANAPISIs, MSIs, and PWIs**

*HEERF and MSI Funding*

	% of Institution	CARES Total	CRRSAA Total	Total Allocations	Allocations per FTE	Allocations per Headcount
AANAPISI	3%	\$ 1,591,698,932	\$ 2,837,460,434	\$ 4,429,159,366	\$ 2,509	\$ 1,488
Enrollment-Based MSI	8%	\$ 2,437,697,526	\$ 4,722,195,840	\$ 7,159,893,366	\$ 2,850	\$ 1,513
Mission-Based MSI	3%	\$ 994,529,453	\$ 1,570,834,205	\$ 2,565,363,658	\$ 9,212	\$ 6,603
PWI	86%	\$ 8,381,175,968	\$ 12,776,831,172	\$ 21,158,007,140	\$ 1,839	\$ 1,202
<b>All Institutions</b>	<b>100%</b>	<b>\$ 13,405,101,879</b>	<b>\$ 21,907,321,651</b>	<b>\$ 35,312,423,530</b>	<b>\$ 2,198</b>	<b>\$ 1,374</b>

*HEERF Only*

	% of Institution	CARES HEERF	CRRSAA HEERF	Total Allocations	Allocations per FTE	Allocations per Headcount
AANAPISI	3%	\$ 1,485,336,985	\$ 2,671,569,295	\$ 4,156,906,280	\$ 2,355	\$ 1,396
Enrollment-Based	8%	\$ 2,274,284,129	\$ 4,449,188,544	\$ 6,723,472,673	\$ 2,676	\$ 1,421
Mission-Based	3%	\$ 366,457,421	\$ 624,188,478	\$ 990,645,899	\$ 3,557	\$ 2,550
PWI	86%	\$ 8,381,175,968	\$ 12,776,831,172	\$ 21,158,007,140	\$ 1,839	\$ 1,202
<b>Total</b>	<b>100%</b>	<b>\$ 12,507,254,503</b>	<b>\$ 20,521,777,489</b>	<b>\$ 33,029,031,992</b>	<b>\$ 2,056</b>	<b>\$ 1,285</b>

Source : U.S. Department of Education (2020c, 2021d, 2021e).

**Table 5: Per-Undergraduate Funding Allocations from CARES and CRRSAA MSI Provision, by Sector and Designation**

Target Race/Ethnicity Groups (12-Month Undergraduate Headcount)	Per-Student Funding			Undergraduate Headcount		
	Two-year	Four-year	Total	Two-year	Four-year	Total
AANAPISI	\$ 18	\$ 50	\$ 32	295,231	214,764	509,995
ANNHSI	\$ 10,545	\$ 9,897	\$ 10,108	2,135	4,424	6,559
HBCU	\$ 5,208	\$ 4,817	\$ 4,872	31,548	194,769	226,317
HSI	\$ 134	\$ 379	\$ 220	1,665,682	898,981	2,564,663
NASNI	\$ 505	\$ 1,109	\$ 762	12,135	8,974	21,109
PBI	\$ 181	\$ 337	\$ 219	164,502	53,148	217,650
TCU	\$ 9,380	\$ 5,861	\$ 6,887	5,614	13,635	19,249
<b>All Students (12-Month Undergraduate Headcount)</b>						
AANAPISI	\$ 3	\$ 10	\$ 6	1,562,909	1,117,336	2,680,245
ANNHSI	\$ 575	\$ 1,080	\$ 832	39,139	40,552	79,691
HBCU	\$ 2,204	\$ 3,725	\$ 3,378	74,540	251,906	326,446
HSI	\$ 59	\$ 170	\$ 98	3,762,342	2,002,269	5,764,611
NASNI	\$ 126	\$ 185	\$ 157	48,561	53,913	102,474
PBI	\$ 93	\$ 169	\$ 112	319,402	105,918	425,320
TCU	\$ 6,094	\$ 5,125	\$ 5,470	8,641	15,593	24,234

Note: For this table only, the HBCU designation excludes HBGI and HBCU-Masters and the HSI designation excludes PPOHA because those programs do not serve undergraduate enrollment. Two-year includes "less than two-year"

Source : U.S. Department of Education (2020c, 2021d)

so, we recognize the difficulty of studying AANAPISIs and MSIs, particularly when comparing them to one another. We do not take this approach lightly and do so to complicate how AANAPISIs are funded and pose questions as to why they are funded in these amounts. Our intent is not to pit different MSIs against one another, as we believe MSIs should collectively coordinate and advocate for greater equity in federal support. Thus, we also conducted an analysis of funding levels for AANAPISIs and MSIs, in comparison to PWIs. We hope that our efforts work to inform solutions that create greater equity in public policy and address systemic racism and inequality in our education systems.

## RESULTS

### Total Funding

Of the \$2.3 billion in emergency funding for MSIs from the CARES Act and CRRSAA, AANAPISIs received \$16 million or 0.7 percent, which was distributed to a total of 165 institutions (Tables 1 and 2). Separately within the CARES Act, a total of 160 AANAPISIs received funding, which ranged from \$171 to \$182,164. With respect to CRRSAA, 163 institutions were funded under the AANAPISI designation, where amounts ranged from \$324 to \$300,065. The combined mean award was \$97,468, which is significantly less in funding compared to other MSIs. For example, HBCUs received an average award of \$14.5 million, while HSIs received an average of \$1.3 million. Despite these funding levels, AANAPISIs comprised 22 percent of all MSIs. In other words, more than one in five MSIs are AANAPISIs, yet they are receiving significantly less funding compared to other MSIs.

With respect to annual appropriations for MSIs, in fiscal year 2020, AANAPISIs received the lowest amount, \$9.1 million of the \$891 million slated for all MSIs. For example, TCCUs received nearly \$65 million in annual appropriations; while HSIs and HBCUs received a combined total of \$250 million and \$498 million, respectively. However, as previously noted, annual appropriations for enrollment-based MSIs (i.e., AANAPISIs, ANNHSI, HSIs, HSI STEMs, PPOHAs, PBIs, NASNTIs) are only awarded to a small percentage of these institutions, given that these MSI programs are five-year competitive grants. For example, of the 165 AANAPISIs that were awarded emergency funds through CARES and CRRSAA, only fifty institutions have been funded through annual appropriations through a competitive grant application since AANAPISIs were established in 2007.

### **AANAPISIs, MSIs, and PWIs**

When considering the totality of all emergency allocations from CARES and CRRSAA, PWIs received more funding than MSIs. Specifically, PWIs received \$21 billion, while MSIs received \$14 billion (Table 3). However, considering that MSIs account for 14 percent of all institutions, while PWIs make up 86 percent, MSIs received a considerable amount of stimulus funding. Thus, when calculating for enrollment at both of these institutional types, MSIs received \$1,748 per student, while PWIs received \$1,202.

Of the allocations, AANAPISIs were appropriated \$4.4 billion in total funding from CARES and CRRSAA (both the MSI provision and from HEERF I and II). Similar to other MSIs, AANAPISIs make up only a small percentage of all institutions (3 percent), while PWIs account for 86 percent. Furthermore, when calculating funding by student, AANAPISIs received \$1,488 per student (Table 4). Thus, while overall allocations may seem low compared to PWIs when considering the number of institutions as well as student enrollment, AANAPISIs are receiving slightly more funding per student from CARES and CRRSAA compared to PWIs.

### **Funding Levels Per Student for AANAPISIs and MSIs**

Although AANAPISIs received greater amounts of funding per student when compared to PWIs, the opposite is true with respect to other MSIs. With funding levels from both CARES and CRRSAA combined, AANAPISIs, received the lowest funding levels of all MSIs, when calculated per student (Table 5). With respect to funding allocations based upon target student enrollment, AANAPISIs were allocated \$32 per AAPI student. When considering differences between institutional types, two-year colleges received \$18 per AAPI student, while four-year institutions received \$50 per AAPI student. However, HBCUs received \$4,872 per African American student and TCUs received \$6,887 per Native American student, while HSIs received \$220 per Latinx student.

When calculating funding allocations based upon all students, AANAPISIs continue to receive the least amount of funding, at \$6 per student. This amount is cut in half to \$3 for two-year institutions and increases to \$10 for four-year institutions. However, at other MSIs, the funding levels shifted, where HSIs received the second-lowest amount at \$98 per student. HBCUs (\$3,378) and TCUs (\$5,470) continue to receive some of the largest amounts of funding when calculating allocations for all students.

## DISCUSSION

This article analyzed federal emergency funding from the CARES Act, the CRRSAA, as well as FY 2020 annual appropriations for MSIs. With respect to total funding, the results revealed that AANAPISIs were severely underfunded compared to other MSIs. This outcome can be simply attributed to the mechanism in which funds were appropriated to the specific MSI designations based upon the Further Consolidated Appropriations Act of 2020 (Public Law 116–94). By relying on this approach, overall funding from both stimulus funding packages did not account for the large number of institutions and the relatively high enrollment at AANAPISIs.

When comparing AANAPISIs and MSIs to PWIs, PWIs did receive twice the amount of emergency funding. However, when calculated based upon per student enrollment, AANAPISIs and MSIs received more CARES and CRRSAA funds than PWIs. And with the specific MSI provision within both funding packages, the amount of funding that AANAPISIs and MSIs received further modestly increases; except in the case of mission-based MSIs (i.e., HBCUs, HBCU Masters, HBGI, TCCUs), which saw a dramatic increase in funding. This can simply be attributed to the overall appropriation that each MSI designation received. Taken in totality, the legislation did prioritize funding of AANAPISIs and MSIs over that of PWIs, which is typically not the case when it comes to overall federal funding to MSIs, where PWIs often receive dramatically greater proportion of resources (National Academies of Sciences, Engineering, and Medicine, 2019).

Finally, AANAPISIs received the least amount of funding, when calculated per student. Again, this outcome is based upon the limited overall funding that AANAPISIs received as a designation and is exacerbated by the combination of the high number of institutions within the AANAPISI designation and large enrollment of students at AANAPISIs. Other MSIs, particularly those that are mission-based, often have much smaller numbers of institutions in comparison (e.g., AANAPISI = 165; HBCU = 99; TCCU = 35), while receiving higher amounts of dollars for their designation. However, within each designation, the formula remains consistent across all designations, except for TCCUs, which offered their own distribution formula (U.S. Department of Education, 2020b). As noted previously, this formula steered greater amounts of funding to institutions with larger enrollment sizes, as well as more low-income students. However, overall funding for each MSI designation creates dramatically different funding levels across all

MSIs, with AANAPISIs receiving the smallest amount of funding per student, and by a large margin.

## **IMPLICATIONS AND CONCLUSION**

Since the passage of the CARES Act and the CRRSAA, the federal government has provided a third COVID-19 stimulus package, which included an additional round of financial support for colleges and universities. And as higher education begins to emerge from this pandemic, our results indicate that the AANAPISI designation is sorely underfunded. To support AAPI students, the federal government should fund AANAPISIs at increased levels. However, we are in no way arguing that this increase should result in a reduction of funding for other MSIs. Instead, any increases made for AANAPISIs should also be made for all other MSIs, where the greater MSI community should advocate for this goal collectively.

Indeed, the Biden–Harris Administration has announced the American Families Plan, which would increase the overall annual appropriations for AANAPISIs by five times if the current funding ratio is maintained. While this proposed initiative would certainly be celebrated by the AANAPISI and broader MSI community, this also serves as an opportune time for Congress to consider moving away from funding MSIs as one unified entity. Instead, policy makers should recognize the historical and ongoing contributions of the various MSI designations and should determine funding levels not in comparison to each other, but based upon the unique characteristics of each MSI designation, as well as in consideration of the vast amounts of federal resources that PWIs receive from the entire suite of federal departments and agencies, such as the National Science Foundation, the National Institute of Health, NASA, along with U.S. Department of Education. Thus, we hope that within these new pieces of legislation, policy makers will increase their support of AANAPISIs and offer new and reimaged distributive models that seek to close the funding gap for AANAPISIs, and simultaneously, increase their support of all MSIs, which continues to be severely underfunded across the entire federal bureaucracy.

Appendix A

Variable Name	Description
unitid	unitid
institution	School
year	IPEDS year
opeid	OPEID
fallenroll	DRVEF2018.Total enrollment
fallenroll_pt	DRVEF2018.Part-time enrollment
completions_total	C2018_B_RV.Grand total
completions_aian	C2018_B_RV.American Indian or Alaska Native total
completions_asian	C2018_B_RV.Asian total
completions_black	C2018_B_RV.Black or African American total
completions_latinx	C2018_B_RV.Hispanic or Latino total
completions_nhpi	C2018_B_RV.Native Hawaiian or Other Pacific Islander total
completions_white	C2018_B_RV.White total
completions_tworaces	C2018_B_RV.Two or more races total
completions_raceunknown	C2018_B_RV.Race/ethnicity unknown total
completions_nonresident	C2018_B_RV.Nonresident alien total
finaid_cohort	SFA1718.Total number of undergraduates - financial aid cohort
finaid_anygrant	SFA1718.Number of undergraduate students awarded federal, state, local, institut
finaid_pellgrant	SFA1718.Number of undergraduate students awarded Pell grants
state	State
gradrate_total	DRVGR2018.Graduation rate, total cohort
gradrate_aian	DRVGR2018.Graduation rate, American Indian or Alaska Native
gradrate_asian	DRVGR2018.Graduation rate, Asian
gradrate_nhpi	DRVGR2018.Graduation rate, Native Hawaiian or Other Pacific Islander
gradrate_black	DRVGR2018.Graduation rate, Black, non-Hispanic
gradrate_latinx	DRVGR2018.Graduation rate, Hispanic
gradrate_white	DRVGR2018.Graduation rate, White, non-Hispanic
gradrate_tworaces	DRVGR2018.Graduation rate, two or more races
gradrate_raceunknown	DRVGR2018.Graduation rate, Race/ethnicity unknown
gradrate_nonresident	DRVGR2018.Graduation rate, Nonresident alien
avg_netprice_ug	SFA1718.Average net price-students awarded grant or scholarship aid, 2017-18
avg_netprice_ug2	SFA1718.Average net price-students awarded grant or scholarship aid, 2017-18
headcount_12mo	DRVEF122018_RV.12-month unduplicated headcount, total: 2017-18
fte_12mo	DRVEF122018_RV.12-month full-time equivalent enrollment: 2017-18
institution2	Alternate institution name - ignore this
opeidelig	HD2018.OPE Title IV eligibility indicator code
size	HD2018.Institution size category
ipeds_control	HD2018.Control of institution
degree_granting	HD2018.Degree-granting status
ipeds_hbcu	HD2018.Historically Black College or University
ipeds_tcu	HD2018.Tribal college
urbanization	HD2018.Degree of urbanization (Urban-centric locale)
level	Calculated institution level (not from IPEDS)
corerevenues	corerevenues (sum of GASB, FASB, for-profit)
fallenroll_total	fall enrollment total (headcount)
fallenroll_aian	fall enrollment American Indian or Alaska Native
fallenroll_asian	fall enrollment Asian
fallenroll_black	fall enrollment Black or African American
fallenroll_hispanic	fall enrollment Hispanic
fallenroll_nhpi	fall enrollment Native Hawaiian or Other Pacific Islander
fallenroll_white	fall enrollment White

Appendix A (continued)	
Variable Name	Description
fallenroll_tworaces	fall enrollment Two or more races
fallenroll_raceunknown	fall enrollment Race/ethnicity unknown
fallenroll_nonres	fall enrollment Nonresident alien
hbcu_cares	CARES act MSI allocations to HBCUs
hbcumasters_cares	CARES act MSI allocations to HBCUs
hbgi_cares	CARES act MSI allocations to HBCUs
tccu_cares	CARES act MSI allocations to TCCUs
aanapisi_cares	CARES act MSI allocations to AANAPISIs
annh_cares	CARES act MSI allocations to ANNHs
nasnti_cares	CARES act MSI allocations to NASNTIs
pbi_cares	CARES act MSI allocations to PBIs
hsi_cares	CARES act MSI allocations to HSIs
ppoha_cares	CARES act MSI allocations to HSIs
aanapisi_crrsaa	CRRSAA MSI allocations to AANAPISIs
annh_crrsaa	CRRSAA MSI allocations to ANNHs
nasnti_crrsaa	CRRSAA MSI allocations to NASNTIs
pbi_crrsaa	CRRSAA MSI allocations to PBIs
hsi_crrsaa	CRRSAA MSI allocations to HSIs
ppoha_crrsaa	CRRSAA MSI allocations to HSIs
tccu_crrsaa	CRRSAA MSI allocations to TCCUs
hbcu_crrsaa	CRRSAA MSI allocations to HBCUs
hbcumasters_crrsaa	CRRSAA MSI allocations to HBCUs
hbgi_crrsaa	CRRSAA MSI allocations to HBCUs
heerf_cares	CARES act HEERF allocations to all institutions
heerf_crrsaa	CRRSAA HEERF allocations to all institutions
hbcutotal_cares	CARES act MSI allocations to HBCUs (total)
hsitotal_cares	CARES act MSI allocations to HSIs (total)
hbcutotal_crrsaa	CRRSAA act MSI allocations to HBCUs (total)
hsitotal_crrsaa	CRRSAA act MSI allocations to HSIs (total)
msi_cares	CARES act total MSI funding (sum of any MSI allocations)
total_cares	CARES act total funding (MSI+HEERF)
msi_crrsaa	CRRSAA total MSI funding (sum of any MSI allocations)
total_crrsaa	CRRSAA total funding (MSI+HEERF)
msi_award	Total MSI allocations across CARES and CRRSAA
total_award	Total MSI and HEERF allocations across CARES and CRRSAA
aanapisi	Total MSI funding to AANAPISIs
annh	Total MSI funding to ANNHs
nasnti	Total MSI funding to NASNTIs
tccu	Total MSI funding to TCCUs
pbi	Total MSI funding to PBIs
hsi	Total MSI funding to HSIs
hbcu	Total MSI funding to HBCUs
is_aanapisi	Denotes an institution that received AANAPISI funding from either CARES or CRRSAA
is_annh	Denotes an institution that received ANNH funding from either CARES or CRRSAA
is_nasnti	Denotes an institution that received NASNTI funding from either CARES or CRRSAA
is_tccu	Denotes an institution that received TCCU funding from either CARES or CRRSAA
is_pbi	Denotes an institution that received PBI funding from either CARES or CRRSAA
is_hsi	Denotes an institution that received HSI funding from either CARES or CRRSAA
is_hbcu	Denotes an institution that received HBCU funding from either CARES or CRRSAA
is_msi	Denotes an institution that received any MSI funding from either CARES or CRRSAA. Blanks did not receive any HEERF
msi_type	Groups institutions as either PWI, enrollment-based, mission-based, or AANAPISI. Blanks did not receive any HEERF



## NOTES

1. Interestingly, and at the unanimous request from all thirty-five TCCUs, a different formula was used to determine individual institutional funding for all thirty-five TCCUs (U.S. Department of Education, 2020b).

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