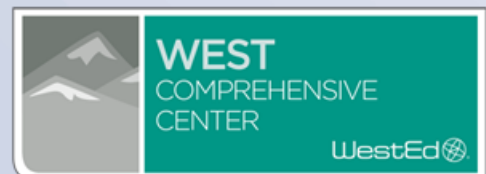


Underuse of Title VII Funding for Indian Education in Arizona, Nevada, and Utah

June 2015

Prepared for the
West Comprehensive Center
at WestEd



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RMC Research Corporation, an approved subcontractor, produced this report for the West Comprehensive Center at WestEd. This work has been funded with monies received from the U.S. Department of Education under Grant Award S283B120006. The content does not necessarily reflect the position or policy of the U.S. Department of Education, nor does mention or visual representation of trade names, commercial products, or organizations imply endorsement by the federal government.

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Contents

Executive Summary	i
Title VII Funding Patterns in Arizona, Nevada, and Utah	i
Findings from Interviews with LEA Representatives	i
Introduction	1
Background	2
Other Funding for AI/AN Student Education	4
Title VII Funding Patterns in Arizona, Nevada, and Utah	5
Title VII Funding Eligibility: Data Sources and Analysis	7
Interviews with LEA Representatives: Methodology	9
Recruitment for Interviews	9
Telephone Interview Protocol	10
Study Limitations	11
Findings from LEA Interviews	12
References	16
Appendices	17
Appendix A: Johnson-O'Malley Funding, by State, 2000–2014	18
Appendix B: Impact Aid Funding, by State, 2008–2013	19
Appendix C: Local Education Agencies That Participated in Telephone Interviews	20
Appendix D: Title VII Needs Assessment Telephone Interview Protocol, July 2014	22

List of Exhibits

1. Title VII Funding for Arizona, by Fiscal Year, 2008 to 2013	5
2. Title VII Funding for Nevada, by Fiscal Year, 2008 to 2013	6
3. Title VII Funding for Utah, by Fiscal Year, 2008 to 2013	6
4. Numbers of LEAs in Arizona, Nevada, and Utah, by Title VII Eligibility and Funding Status	8
5. Numbers of Students Served and Unserved by Title VII in Arizona, Nevada, and Utah, 2013	8
6. Distribution of Respondents, by State and Title VII Funding Status	10

Executive Summary

This report explores why some schools and districts have not been accessing federal Title VII funds for which they are eligible, potentially resulting in American Indian/Alaska Native (AI/AN) students missing out on programs targeted to their needs. The report presents results from analyses of recent public data and interviews with representatives of local education agencies (LEAs).

Specifically, the study was designed to: (1) identify which LEAs in Arizona, Nevada, and Utah were eligible for but *not* receiving Title VII funding in fiscal year 2013; (2) determine why some eligible LEAs were not receiving Title VII funding; (3) identify strategies for improving access to Title VII funding; and (4) learn from the experiences of eligible LEAs that *did* apply for and receive Title VII funding.

According to data from the U.S. Department of Education (2014), LEAs' participation in the Title VII program has fluctuated in recent years in a number of states.

Title VII Funding Patterns in Arizona, Nevada, and Utah

To gather data for the study, researchers first analyzed publicly available data (e.g., from the National Center for Education Statistics [NCES, 2014] and from USASpending.gov [2014]) to identify Title VII funding patterns in recent years for Arizona, Nevada, and Utah, and to identify LEAs that were eligible for funding, and then sorted the data by whether the eligible LEAs received funding or not.

The data analysis indicated the following findings:

The amount of Title VII funding that LEAs received fluctuated across the five years that researchers examined for the three Western states (2008–2013). Two other sources of support for the education of AI/AN students, Impact Aid and Johnson-O'Malley funding, also fluctuated across those years.

Data analysis suggests that a considerable number of AI/AN students in eligible LEAs in the region were not receiving Title VII services.

Findings from Interviews with LEA Representatives

During the summer and fall of 2014, researchers attempted to contact representatives of all the LEAs they had identified as eligible-but-unfunded. Ultimately researchers interviewed individuals from 39 LEAs to ask about their knowledge of and experience with Title VII funding.

Researchers asked interviewees a series of questions to determine why the eligible LEAs had not been funded by Title VII. Although the focus was on contacting LEAs identified as eligible-but-unfunded, shortcomings in the data sources for determining funding status meant that a number of these LEAs that had been identified as unfunded turned out to have actually received Title VII funding. Researchers used the opportunity to ask representatives of these funded LEAs about how their districts were using the funds. Researchers analyzed responses for trends and patterns, organizing the findings based on each LEA's Title VII funding status.

- 1. The primary difference between eligible LEAs that received Title VII funding versus eligible LEAs that did not receive this funding was in terms of knowledge about the Title VII program.**
- 2. Respondents from eligible-but-unfunded LEAs often held misconceptions about the Title VII program, particularly its eligibility requirements.**
- 3. A number of respondents from unfunded LEAs wanted to be sure that the effort needed to procure funds was worthwhile in terms of benefits to the students.**
- 4. Generally, respondents wanted more information about Title VII, recommended that state leaders be more proactive in providing the information, and had many suggestions for how to convey the information to LEAs.**
- 5. Respondents had suggestions for the particular kinds of information that they would find helpful, such as information about eligibility, program implementation, and best practices for using the funds.**
- 6. Respondents from LEAs that did receive Title VII funding expressed general satisfaction with their experiences with the Title VII program and application process.**
- 7. Nonetheless, respondents from funded LEAs wanted to receive more information to help them engage in effective practices and were interested in timely updates on any changes to reporting requirements.**
- 8. Respondents from LEAs with Title VII funding reported using the funds to hire staff and to expand services for AI/AN students.**

Introduction

Out of concern that eligible local education agencies (LEAs) may not be applying for funding from the federal Title VII program to support the education of American Indian/Alaska Native (AI/AN) students,¹ state-level education leaders in Arizona, Nevada, and Utah—the region served by the West Comprehensive Center (WCC) at WestEd—asked WCC researchers to look into the issue. This report is based on the researchers’ analysis of recent public data and on interviews with selected LEA representatives. The report investigates funding patterns and identifies strategies that may help LEAs in the WCC region to access Title VII funds so that more AI/AN students have opportunities to benefit from programs targeted to their needs.

The study was designed to: (1) identify which LEAs in Arizona, Nevada, and Utah were eligible for but *not* receiving Title VII funding in fiscal year 2013; (2) determine why some eligible LEAs were not receiving Title VII funding; (3) identify strategies for improving access to Title VII funding; and (4) learn from the experiences of eligible LEAs that *did* apply for and receive Title VII funding.

To explore these topics, researchers gathered and analyzed data from publicly available sources, identified trends in the acquisition and use of Title VII funds in the three western states, and identified individual LEAs that were eligible for but not receiving Title VII funding. Researchers then contacted representatives of these LEAs and interviewed them by telephone to better understand the context and implementation of Title VII funding in Arizona, Nevada, and Utah. Specifically, the study sought to address the following overarching questions:

1. What were the trends in the acquisition and use of Title VII funds in Arizona, Nevada, and Utah in recent years?
2. To what extent were eligible LEAs in these states knowledgeable about Title VII funding, and how did they learn about the Title VII program?
3. To what extent were eligible LEAs that did not receive Title VII funding interested in the Title VII program?
 - What, if anything, might prevent eligible LEAs in Arizona, Nevada, and Utah from applying for Title VII?
 - What kinds of assistance might be provided to encourage eligible LEAs to apply for Title VII funding?

¹ With some exceptions related to specific citations, the terms Indian, Native, Native American, American Indian/Alaska Native (AI/AN), and Native Hawaiian are used to refer generally to sovereign/indigenous people of the United States.

4. What general advice do eligible LEAs have for improving information about Title VII funding?
5. To what extent were some eligible LEAs that received Title VII funding impacted by the Title VII program?
 - How were Title VII funds utilized?
 - What kinds of assistance could help funded LEAs better implement Title VII funds and meet reporting requirements?

Background

The United States government has a statutory obligation to provide support for the education of American Indian/Alaska Native (AI/AN) students. Title VII of the federal Elementary and Secondary Education Act (1968) is one of the programs serving this function. Title VII provides funding based on a formula grant available to school districts, charter schools, and other agencies considered to be LEAs, based on the number of AI/AN students enrolled in the LEA. According to data from the U.S. Department of Education (2014), participation in the Title VII program has fluctuated in recent years in a number of states.

According to the U.S. Department of Education National Center for Education Statistics (NCES) (2014), there were an estimated 601,000 American AI/AN students enrolled in public elementary and secondary schools in 2009. This number dropped to 547,000 by 2011 (the most recent data available). During this same time period, enrollment in the U.S. Bureau of Indian Education (BIE) schools was relatively stable at 49,220 students in 2009 (U.S. Bureau of Indian Education, 2014a); 49,152 students in 2010 (U.S. Bureau of Indian Education, 2014b), and 49,079 students two years later in 2012 (U.S. Bureau of Indian Education, 2014c). The Education Trust (2013) reported that only 7 percent of AI/AN students attended BIE schools, while the rest attended regular public schools. In fact, more AI/AN students attended Arizona public schools in 2013 (53,387 students) than attended all BIE schools combined throughout the United States (41,051 students) (U.S. Bureau of Indian Education, 2015).

Research suggests that AI/AN students perform lower on common academic measures compared to other student subpopulations. For example, AI/AN students were less likely to score proficient on National Assessment of Educational Progress (NAEP) assessments than other students; only 18 percent of 4th grade AI/AN students were proficient or above in reading in 2011, compared to 42 percent of white students; and only 17 percent of AI/AN 8th grade students were proficient or above in mathematics in 2011, compared to 43 percent of white students (Education Trust, 2013). In addition, the Education

Trust (2013) reports that the national average for graduation rates for AI/AN students was lower than for white students, with AI/AN students averaging 69 percent and white students 83 percent. AI/AN students were also less likely to have access to and participate in high-level courses in high school, compared to other students. For example, 91 percent of white students and 97 percent of Asian students had access to these courses, while only 76 percent of AI/AN students had access (Education Trust, 2013). Another achievement gap disparity is that 52 percent of AI/AN students enrolled in college right after high school compared to 74 percent of white students (Education Trust, 2013).

Title VII funding provides one avenue of support to improve the achievement of AI/AN students. The purpose of Title VII funding is to:

Support the efforts of local educational agencies, Indian tribes and organizations, postsecondary institutions, and other entities to meet the unique educational and culturally related academic needs of American Indian and Alaska Native students, so that such students can meet the same challenging State student academic achievement standards as all other students are expected to meet.
(U.S. Department of Education, 2014, Section 7102)

An LEA qualifies for Title VII funding if it has a minimum of 10 AI/AN students, or at least 25 percent of its students represent this demographic group (U.S. Department of Education, 2014). However, identification of individuals as AI/AN students is the least stable student identification, compared to identification in other demographic groups (Snyder & Dillow, 2013). It has recently become apparent that sizable numbers of AI/AN students are not being counted in some datasets, while AI/AN students are more accurately enumerated in other datasets. For example, American Indians were undercounted on reservations (U.S. Census Bureau, 2012). If these students are not being counted, they are likely not being served by the Title VII program.

There are plausible explanations for this undercounting. For example, some districts in Colorado have reported that recent changes in how the U.S. Census Bureau defines AI/AN people have led to some confusion regarding how AI/AN students are being identified (Jesse & Parra, 2014). It is possible that the economic downturn in 2009 led to some mobility for AI/AN families and may have influenced how students have been counted.

Another possibility is that LEAs eligible for Title VII funding are not applying for or receiving this funding for reasons other than undercounting AI/AN students. Regardless of the reasons why some eligible LEAs neither apply for nor receive this funding, LEAs without Title VII funds may be unable to provide additional services to AI/AN students. There is very little information in the research literature about why eligible LEAs do not apply for Title VII.

Other Funding for AI/AN Student Education

There are two other prominent sources of funding to support the education of AI/AN students: Johnson-O'Malley and Impact Aid. (See Appendices A and B, respectively, for funding levels by state for these two sources.)

Johnson-O'Malley funding is designed to provide supplemental programming to meet “the special educationally related needs of eligible Indian students” (General Services Administration, 2015). States, school districts, tribal organizations, or Indian Corporations are eligible to apply. These entities must “have eligible Indian children attending public school districts and have established Indian Education Committees to approve supplementary or operational support programs beneficial to Indian students” (General Services Administration, 2015). Eligible beneficiaries include children from age three through twelfth grade “who are enrolled members of, or at least one-fourth or more degree of Indian blood descendant of a member of a federally recognized Indian tribal government eligible for service by the Bureau” (General Services Administration, 2015). The program is administered by the BIE.

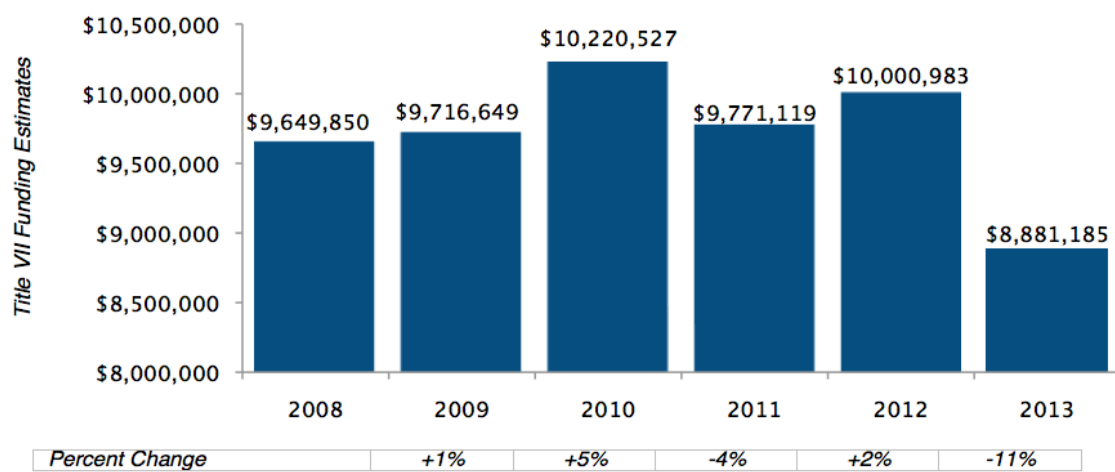
Impact Aid replaces funding that would have been collected through property taxes on lands that are not being taxed because they are federally controlled, placing a financial burden on LEAs that are responsible for the education of AI/AN students.

Title VII Funding Patterns in Arizona, Nevada, and Utah

To determine the extent to which districts and schools in Arizona, Nevada, and Utah receive Title VII funding, researchers analyzed data from USASpending.gov (2014), which lists federal funding transactions by fiscal year (i.e., October 1 through September 30). This source was used to determine total amounts of new awards of Title VII funding received by LEAs in the three states each year from 2008 through 2013.

According to the USASpending.gov (2014) data, Title VII funding for new awards for LEAs in Arizona remained relatively stable from 2008 to 2012, fluctuating no more than +5 percent, peaking in 2010, and then declining by 11 percent from 2012 to 2013. See Exhibit 1 below.

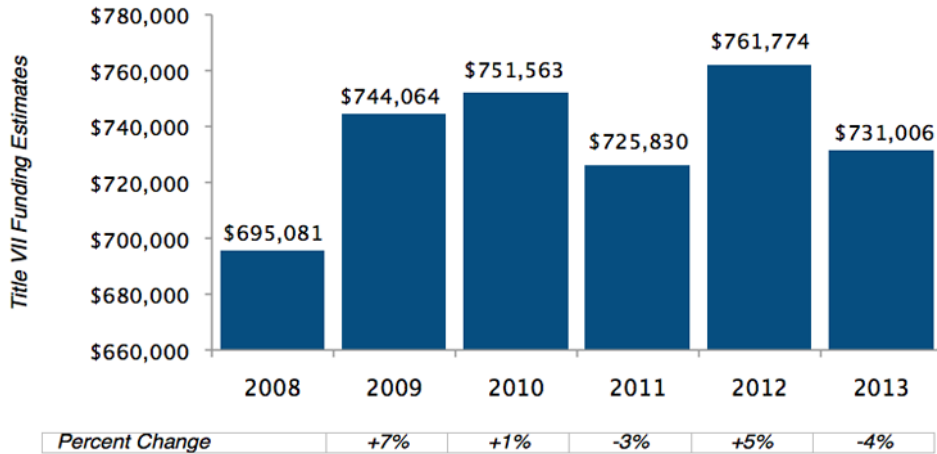
Exhibit 1. Title VII Funding for Arizona, by Fiscal Year, 2008 to 2013



Source: <https://www.usaspending.gov/>, new awards only for designated years, estimates extracted during summer 2014.

In Nevada, Title VII funding of new awards for LEAs reached its highest level in 2012 and dropped by about 4 percent from 2012 to 2013. Nevada funding increased 7 percent from 2008 to 2009, then fluctuated no more than +5 percent from 2010 to 2013. See Exhibit 2 below.

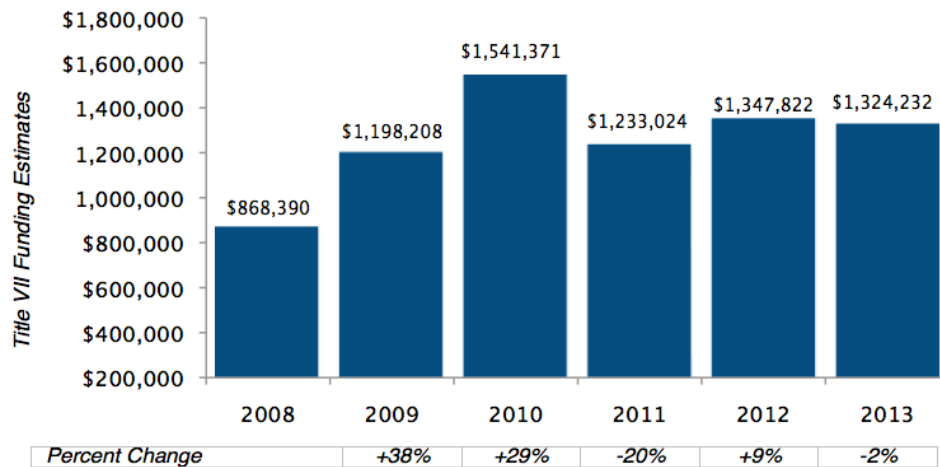
Exhibit 2. Title VII Funding for Nevada, by Fiscal Year, 2008 to 2013



Source: <https://www.usaspending.gov/>, new awards only, estimates extracted during summer 2014.

LEAs in Utah experienced the greatest fluctuations in Title VII funding of new awards, which increased 38 percent from 2008 to 2009, another 29 percent in 2010, then dropped 20 percent in 2011, and increased 9 percent in 2012. Title VII new awards funding peaked in 2010 for Utah LEAs, then stabilized around \$1.3 million in 2012 and 2013, dropping just 2 percent in 2013. New awards funding levels were 14 percent lower in 2013 compared to 2010. See Exhibit 3 below.

Exhibit 3. Title VII Funding for Utah, by Fiscal Year, 2008 to 2013



Source: <https://www.usaspending.gov/>, new awards only, estimates extracted during summer 2014.

Title VII Funding Eligibility: Data Sources and Analysis

In order to interview representatives of LEAs that were eligible for but not funded by Title VII grants, researchers first sought to determine which LEAs in the three states were eligible for Title VII funding. To determine this, researchers compared Title VII eligibility requirements, which are based on an LEA's enrollment of AI/AN students, against enrollment estimates from NCES for each LEA in each state. The enrollment data were from the 2011/12 academic year, the most recent NCES data available. Title VII eligibility requirements change from year to year. To provide information that can best inform future policy decisions, researchers used the eligibility criteria for the most recent school year (2014/15), which are as follows: the LEA is eligible for Title VII funding if (1) it has a minimum of 10 AI/AN students, or (2) at least 25 percent of its student population consists of AI/AN students.

By comparing the NCES enrollment data against the eligibility criteria, researchers generated a list of eligible LEAs that consisted of 681 LEAs in Arizona, 18 in Nevada, and 141 in Utah, for a total of 840 eligible LEAs in the three states.

Researchers then compared the eligibility lists for each state's LEAs against the funding data derived from USASpending.gov (2014) to create a tally of how many eligible LEAs in each of the three states recently *did* receive new Title VII funding awards and how many LEAs *did not*.

The results show that not all eligible LEAs in these states applied for the Title VII funding. The final lists consist of 91 eligible LEAs that *did* receive new awards for Title VII funds between 2008 and 2013, and 195 LEAs (68 percent) that appeared to be eligible but were *not* on the Title VII grants list in 2013. This "eligible-but-unfunded" list consists of 171 LEAs from Arizona, 8 LEAs from Nevada, and 16 LEAs from Utah. Of the 236 Arizona LEAs that were eligible to receive Title VII funding, 65 LEAs (28 percent) were awarded these funds in 2013. About 47 percent (7 of the 15) of eligible LEAs in Nevada received Title VII funding. About 54 percent (19 of 35) of the eligible LEAs in Utah received Title VII funding. See Exhibit 4 below.

Exhibit 4. Numbers of LEAs in Arizona, Nevada, and Utah, by Title VII Eligibility and Funding Status

	Arizona	Nevada	Utah	Total
<i>Number of LEAs</i>	681	18	141	840
<i>Number of LEAs Not Eligible for Title VII</i>	445	3	106	554
<i>Number of LEAs Eligible for Title VII</i>	236	15	35	286
Eligible and Funded in 2013	65	7	19	91
Eligible and Not Funded in 2013	171	8	16	195

Notes. Totals include state charters in Nevada; "Not Eligible" designation is based on no data, no AI/AN students, data not applicable, fewer than 10 AI/AN students, or AI/AN students comprise less than 25% of total enrollment in the LEA; and "Eligible" designation is based on 10 or more AI/AN students, or AI/AN students comprise 25% or more of total enrollment in the LEA.

Sources. <http://nces.ed.gov/ccd/elsi/expressTables.aspx>, 2011/12 data (most current data available); and <https://usaspending.gov/>, 2013 data (most current data available).

The eligible-but-unfunded LEAs serve an estimated 11,848 AI/AN students, meaning that approximately 18 percent of AI/AN students in the three states were likely to not receive services funded by Title VII during the period covered by this study. See Exhibit 5 below.

Exhibit 5. Numbers of Students Served and Not Served by Title VII in Arizona, Nevada, and Utah, 2013

	Arizona	Nevada	Utah	Total
<i>Estimated number of AI/AN students in eligible LEAs that received Title VII funding</i>	43,347	3,966	6,678	53,991
<i>Estimated number of AI/AN students in eligible LEAs that did not receive Title VII funding</i>	10,040	1,050	758	11,848
Total AI/AN Student Estimates	53,387	5,016	7,436	65,839

Note. Students attending BIE schools are not included in these numbers.

Sources. <http://nces.ed.gov/ccd/elsi/tableGenerator.aspx> and <https://www.usaspending.gov/>.

Interviews with LEA Representatives: Methodology

Recruitment for Interviews

Between May 28, 2014, and November 20, 2014, researchers attempted at least once to contact each of the 195 LEAs identified as unfunded but eligible for Title VII funding. Researchers attempted to contact non-respondent LEAs up to three times, and 38 percent of the total number of LEAs did not respond after being contacted two or three times. A total of 19 LEAs in Arizona (10 percent of the sample) could not be reached due to inaccurate contact information (5 percent) or the inability to leave a message (5 percent). Individuals from 12 LEAs (11 in Arizona, 1 in Nevada) elected not to participate in the study, stating that they lacked the time or interest, did not believe they had a sufficient number of AI/AN students, or did not know who would be the best person to participate in the telephone interview. Researchers continued to contact LEA sites and conduct telephone interviews until they determined that all information being received was repetitious and nothing new was being learned. Further attempts to contact potential LEA participants were discontinued at this point.

When contacting LEAs, researchers attempted to speak to representatives who were knowledgeable about Title VII funding and AI/AN education. It was often necessary to speak to several individuals before reaching an informed representative and, in some cases, a knowledgeable representative was not identified. All respondents were informed that the interview was voluntary and that any information they provided would be confidential. Telephone interviews typically lasted between 5 and 10 minutes.

The recruitment effort resulted in a final sample of 39 LEAs for which representatives were interviewed. Respondents from 10 of these LEAs (26 percent of the final sample) stated that their LEAs had received Title VII funding, even though initial data analysis had indicated that these LEAs had *not* received Title VII funding. Respondents from the other 29 LEAs in the sample (74 percent of the total sample) confirmed that their LEAs had not received Title VII funding. See Exhibit 6 below.

Exhibit 6. Distribution of Respondents, by State and Title VII Funding Status

	Receives Title VII Funding	Does Not Receive Title VII Funding	Total Sample
<i>State (N)</i>	<i>n</i>	<i>n</i>	<i>n</i>
Arizona (171)	3	26	29
Nevada (8)	3	1	4
Utah (16)	4	2	6
Total	10	29	39

Respondents were school and administrative staff or school and district personnel, such as grant managers, business development directors, and superintendents. The final sample includes large and small districts, charter schools, and respondents from various parts of Arizona, Nevada, and Utah. (See Appendix C for a list of all of the LEAs that participated in the telephone interviews.)

Telephone Interview Protocol

The telephone interview protocol consisted of 14 open-ended questions. All respondents were asked what they knew about Title VII funding, how they learned about the program, and if their school or district received Title VII funding.

When interviewing representatives of LEAs that received Title VII funding, researchers asked how funding was being utilized, whether assistance was needed to implement the Title VII program, and, if so, what assistance would be helpful, and whether respondents needed help with reporting requirements. The LEA representatives were also asked what their respective LEAs' needs were, what types of assistance they would like from the West Comprehensive Center (WCC) at WestEd, and what advice respondents would give state directors of Indian education about the Title VII program.

When interviewing representatives of LEAs without Title VII funding, researchers asked why the eligible LEAs did not receive Title VII funding, what might prevent eligible LEAs from applying for Title VII funding, what advice they have for disseminating information about Title VII, and what their suggestions were for the kinds of assistance that state education agencies, state directors of Indian education, and the WCC could provide to encourage and help eligible LEAs to apply for Title VII funding. Representatives of the unfunded LEAs also were asked if they wanted to receive additional information about Title VII funding. (See Appendix D for a copy of the interview protocol.)

Researchers analyzed the qualitative data from the telephone interviews to identify key themes, trends, and patterns using an approach that closely follows methods explicated by Miles, Huberman, and Saldaña (2014).

Study Limitations

Because this study involved a relatively informal data-gathering process done over a short period of time in three specific states, its findings should not be considered broadly generalizable. The primary limitation of this study is the small sample size, although a point of response saturation was reached when additional respondents provided only information that essentially repeated what had already been provided by earlier respondents, which may indicate that conducting more interviews with a larger sample would not have resulted in any different findings (see Carley-Baxter et al., 2009; Creswell, 1998). With representatives of eligible LEAs that did not receive Title VII funding (n=29), saturation was reached during the first wave of interviews, specifically after the first 19 interviews in summer 2014. Additional interviews with this group during fall 2014 did not reveal new information. With representatives of eligible LEAs that did receive Title VII funding (n=10), saturation was not reached.

Another factor contributing to the small sample size is that some eligible LEAs appeared uninformed about Title VII, and the incorrect individual may have been solicited for participation. Researchers took steps to limit this possibility, such as contacting three to four individuals in an effort to reach the representative most knowledgeable about Title VII funding. Interviews were typically conducted with grant or business development managers, and sometimes with principals or those who implemented programs for AI/AN students. A targeted effort was made to reach the best representative of the LEA who would be the most knowledgeable about Title VII.

Another limitation involves the procedures used to identify LEAs' eligibility for Title VII funding. Because multiple datasets were used, and those datasets contained some inaccurate information, the estimates for LEAs that are eligible may have inaccuracies. Researchers anticipated the possibility of contacting LEAs that were funded and used the opportunity to collect additional information from the LEAs and to gain other perspectives about the funding process. Although consistent themes emerged, these findings should be interpreted with caution given the small sample size of LEAs that participated.

Findings from LEA Interviews

1. The primary difference between eligible LEAs that received Title VII funding versus eligible LEAs that did not receive Title VII funding was in terms of knowledge about the program.

Respondents from LEAs that received Title VII funding reported that they had been funded for many years and were very familiar with the grant program. Most LEAs received direct Title VII funding from the U.S. Department of Education. A few LEAs received Title VII funding through partnerships with nearby tribes or reservations.

By contrast, respondents from eligible LEAs that were not funded by Title VII were generally unfamiliar with the program, and the eligibility requirements were often unclear or unknown to them. Many respondents indicated that participation in this study was the first time they had learned about Title VII as a mechanism to serve the educational and cultural needs of AI/AN students in their school or district.

Respondents who were familiar with Title VII had learned about it from several sources, which include:

- the state education agency;
- tribes or reservations;
- federal program information sources; and
- school staff with previous experience with this federal program.

2. Respondents from eligible-but-unfunded LEAs often held misconceptions about the Title VII program, particularly its eligibility requirements.

Some respondents thought that their LEAs were ineligible because of a low number or percentage of AI/AN students. Five respondents thought (incorrectly) that they could not apply because they already received Impact Aid or Johnson-O'Malley funding. This inaccurate understanding demonstrates that some eligible LEAs were misinformed. A couple respondents discussed the process of applying for Title VII funds from a cost-benefit perspective, stating it was not worth the effort if the staff time required to apply for and manage the funds exceeded the amount of money received. A few respondents believed that applying for the Title VII program would force them to compete with neighboring tribes and reservations for funding.

The full range of responses that respondents from eligible-but-unfunded LEAs provided for not pursuing funding is as follows:

- Lack of knowledge about Title VII (n=9)
- A belief that they did not meet eligibility criteria (n=9)
- Did not know why they had not applied (n=6)
- Had not applied previously (n=4)
- Change in staff (n=3)
- Reticence to spend the time required to complete the application and monitor the funding (n=1)
- Misconceptions about Title VII requirements (n=2)
- A belief that there was no need for additional support for AI/AN students (n=2)

3. A number of respondents from unfunded LEAs wanted to be sure that the effort needed to procure funds was worthwhile in terms of benefits to the students.

One particular area of uncertainty or lack of knowledge about Title VII concerned the details of what participation in the Title VII program entails. Some respondents said that they would be more likely to apply for Title VII grants if they knew that the benefits outweighed the costs for application, management, and reporting. These respondents saw the benefit of providing programming for AI/AN students, but emphasized that sufficient funds to directly serve the AI/AN students, once administrative staff time was covered, were needed.

4. Generally, respondents wanted more information about Title VII, recommended that state leaders be more proactive in providing the information, and had many suggestions for how to convey the information to LEAs.

Most respondents indicated that they thought more should be done to make LEAs aware of Title VII, particularly that state education agencies and Indian education departments may need to be more proactive in sharing information with eligible LEAs about Title VII. When asked about assistance and support that might be provided to inform LEAs about Title VII and to encourage eligible LEAs to apply for Title VII, respondents identified a variety of dissemination strategies and a range of communication channels, including the following:

- Provide Title VII trainings (n=9)
- Provide examples of best practices (n=8)
- Sponsor Title VII webinars (n=7)
- Identify LEAs that are eligible to apply, and reach out to them (n=7)
- Send emails about Title VII (n=6)
- Send instructions or a simple fact sheet that outlines how to apply (n=6)
- Provide Title VII liaisons or contacts (n=5)

- Present information about Title VII at Title I and other funding meetings (n=4)
- Ensure that Title VII information is provided through grants management systems (n=3)
- Call eligible LEAs and encourage them to apply (n=2)
- Provide informative PowerPoint presentations to eligible LEAs (n=2)
- Send applications, as well as provide technical assistance to complete applications (n=2)
- Send letters to eligible LEAs about Title VII (n=2)

When asked how service providers such as state education agencies, state Indian education directors, and the WCC could improve Title VII funding acquisition and implementation, five LEA representatives suggested that providers should become more proactive in sharing information with eligible LEAs. Eight other respondents suggested communicating through the state education agencies, and particularly through federal program directors, to disseminate information about the funding, perhaps through calendared events. Five respondents recommended that information be sent to individuals in the grants management office, school administrators, and LEA personnel, in addition to superintendents, since superintendents are often too busy to distribute information.

5. Respondents had suggestions for the particular kinds of information that they would find helpful, such as information about eligibility, program implementation, and best practices for using the funds.

Ten respondents believed that information should be shared about eligibility criteria, funding allocations, ideas for implementation, and fund management. Seven respondents suggested that the WCC provide ideas about the best ways to serve AI/AN students with this funding. Four respondents' suggestions focused on identifying best practices and interventions specific to AI/AN student populations, and two respondents expressed interest in receiving thorough reviews of the literature to guide the implementation of practices and interventions for this population. Six respondents mentioned that it would help to know how much money a Title VII grant offered and how they could spend the funding. And five respondents thought the program should be better funded.

6. Respondents from LEAs that did receive Title VII funding expressed general satisfaction with their experiences with the Title VII program and application process.

Respondents indicated that they thought the application process was simple and the program was worth implementing. Several respondents characterized the reporting requirements and process as relatively straightforward, easy to follow, and not particularly

stringent compared to requirements for other programs. The respondents said that they did not need additional technical assistance to help them fulfill reporting requirements.

7. Nonetheless, respondents from funded LEAs wanted to receive more information to help them engage in effective practices and were interested in timely updates on any changes to reporting requirements.

Some respondents from the funded LEAs thought it would be helpful to have program updates and additional guidance from the state education agency on how to improve education for AI/AN students and more information on how other LEAs were using Title VII funds. Four respondents suggested that it would be helpful if they could be provided with additional information and technical assistance regarding implementation and best practices.

One respondent from a funded LEA was unfamiliar with the reporting requirements and thought it might be helpful to clarify exactly what needed to be reported. For example, a respondent noted that reporting requirements had recently changed and asked about how to report student achievement.

8. Respondents from LEAs with Title VII funding reported using the funds to hire staff and to expand services for AI/AN students.

Respondents from five of the funded LEAs reported that they allocated most of their Title VII funds to staff positions, such as AI/AN liaisons, mentors, and instructional assistants who directly worked with and monitored AI/AN students. Three respondents described applying these funds toward programs, and one respondent said funds were used for educational software (e.g., credit recovery software) intended to help improve graduation rates, cultural programming, and parental involvement for the benefit of AI/AN students.

References

Carley-Baxter, L. R., Hill, C. A., Roe, D. J., Twiddy, S. E., Baxter, R. K., & Ruppenkamp, J. (2009). Does response rate matter? Journal editors' use of survey quality measures in manuscript publication decisions. *Survey Practice*, 2(7). ISSN: 2168-0094.

Creswell, J. W. (1998). *Qualitative inquiry and research design: Choosing among five traditions*. Thousand Oaks, CA: SAGE Publications, Inc.

Education Trust. (2013). *The state of education for Native students*. Washington, DC: Author. Retrieved from <http://edtrust.org/resource/the-state-of-education-for-native-students/>

General Services Administration. (2015). *Catalog of federal domestic assistance* ["Program information" and "Impact aid" pages]. Retrieved from <https://www.cfda.gov/index?s=program&mode=form&tab=core&id=ac707cf589029a80e05e509d9ba4a50c> and <https://www.cfda.gov/index?s=program&mode=form&tab=core&id=4ee7c66c1998f589a763b6740ddcc176>

Jesse, D., & Parra, M. (2014, September 10). *Mountain Plains Desert Collaborative Title VII progress report*. Presented at the meeting of the Mountain Plains Desert Collaborative, Denver, CO.

Miles, M. B., Huberman, A. M., & Saldaña J. (2014). *Qualitative data analysis: A method sourcebook* (3rd ed.). Thousand Oaks, CA: Sage Publications Inc.

National Center for Education Statistics (NCES). (2014). *Enrollment and percentage distribution of enrollment in public elementary and secondary schools, by race/ethnicity and region: Selected years, fall 1995 through fall 2023* [Table 203.30]. Advance release of selected digest tables. Retrieved from http://nces.ed.gov/programs/digest/d13/tables/dt13_203.50.asp

Snyder, T. D., & Dillow, S. A. (2013). *Digest of Education Statistics 2012* (NCES 2014-015). Washington, DC: National Center for Education Statistics, Institute of Education Sciences, U.S. Department of Education. Retrieved from <http://nces.ed.gov/pubs2014/2014015.pdf>

U.S. Bureau of Indian Education (BIE). (2014a). *School report cards archive*. Retrieved from <http://www.bie.edu/cs/groups/xbie/documents/text/idc012921.pdf>

U.S. Bureau of Indian Education (BIE). (2014b). *School report cards archive*. Retrieved from <http://www.bie.edu/cs/groups/xbie/documents/text/idc016697.htm>

U.S. Bureau of Indian Education (BIE), Division of Performance and Accountability. (2014c). *Bureau-wide annual report SY2012-2013*. Retrieved from <http://www.bie.edu/cs/groups/xbie/documents/text/idc1-026197.pdf>

U.S. Bureau of Indian Education (BIE). (2015). *Reports* [agency website page]. <http://www.bie.edu/HowAreWeDoing/index.htm>

U.S. Census Bureau. (2012). *Census Bureau releases estimates of undercount and over-count in the 2010 Census*. (release CB12-95). Retrieved from http://www.census.gov/newsroom/releases/archives/2010_census/cb12-95.html

U.S. Department of Education. (2014). *Title VII—Indian, Native Hawaiian, and Alaskan Native education*. (Sec. 7102). Retrieved from <http://www2.ed.gov/policy/elsec/leg/esea02/pg98.html>

USASpending.gov. (2014). *USASpending.gov: An official website of the United States Government*. Retrieved from <https://www.usaspending.gov/>

Appendices

Appendix A: Johnson-O'Malley Funding, by State, 2000–2014

Appendix B: Impact Aid Funding, by State, 2008–2013

Appendix C: Local Education Agencies That Participated in Telephone Interviews

Appendix D: Title VII Needs Assessment Telephone Interview Protocol:
July 2014

Appendix A: Johnson-O'Malley Funding, by State, 2000–2014

Year	Arizona	Nevada	Utah
2000	403,398	ª	ª
2001	6,034,019	265,181	73,888
2002	117,157	94,308	3,072
2003	602,406	94,074	48,038
2004	5,846,867	257,570	71,725
2005	10,335,744	467,216	70,726
2006	5,587,260	285,647	69,239
2007	ª	ª	ª
2008	ª	0	0
2009	0	0	0
2010	ª	ª	ª
2011	ª	ª	ª
2012	ª	ª	ª
2013	3,696,012	111,925	ª
2014	3,648,051	96,131	52,031
Total	\$36,270,914	\$1,672,052	\$388,719

ª Information not available from <https://www.usaspending.gov/>

Note. Negative dollar amounts were excluded from these total calculations.

Source: <https://www.usaspending.gov/>

Appendix B: Impact Aid Funding, by State, 2008–2013

Year	Arizona	Nevada	Utah
2008	162,098,595	4,202,543	9,441,356
2009	173,217,035	4,070,402	9,382,871
2010	181,846,342	3,611,851	8,360,261
2011	172,237,998	3,798,639	9,623,676
2012	105,081,432	2,160,479	8,431,328
2013	157,361,813	3,378,071	9,090,992
Total	\$951,843,215	\$21,221,985	\$54,330,484

Note. Negative dollar amounts were excluded from these total calculations.

Source: <https://www.usaspending.gov/>

Appendix C: Local Education Agencies That Participated in Telephone Interviews

Name	City	Number of AI/AN Students*	Total Number of Students*	Percentage
Arizona				
1. Academy of Mathematics and Science Inc.	Tucson	10	334	3%
2. Apache Junction Unified District	Apache Junction	45	4,833	1%
3. Cartwright Elementary District	Phoenix	224	18,359	1%
4. Casa Grande Elementary District ^a	Casa Grande	495	7,342	7%
5. Coconino County Regional Accommodation School District	Flagstaff	94	138	68%
6. Colorado City Unified District	Colorado City	15	410	4%
7. Colorado River Union High School District	Bullhead City	35	2,272	2%
8. E-Institute Charter Schools Inc.	Glendale	17	559	3%
9. Gila County Regional School District	Globe	29	103	28%
10. Ha:san Educational Services	Tucson	151	173	87%
11. Heber-Overgaard Unified District	Heber	15	493	3%
12. Ira H. Hayes Memorial Applied Learning Center, Inc.	Bapchule	63	70	90%
13. Liberty Elementary District	Buckeye	23	3,225	1%
14. Littleton Elementary District	Avondale	69	5,090	1%
15. Miami Unified District	Miami	45	1,223	4%
16. Northeast Arizona Technological Institute of Vocational Education	Kayenta	23	23	100%
17. Oracle Elementary District	Oracle	14	698	2%
18. Payson Unified District	Payson	64	2,399	3%
19. Peoria Unified School District	Peoria	343	36,620	1%
20. Pillar Charter School	Phoenix	19	38	50%
21. Pinnacle Education-Tempe Inc.	Tempe	29	722	4%
22. Portable Practical Educational Preparation Inc.	Tucson	23	950	2%
23. Precision Academy Systems Inc.	Phoenix	10	452	2%
24. Queen Creek Unified District	Queen Creek	49	5,212	1%
25. Shonto Governing Board Of Education Inc.	Shonto	93	94	99%
26. Somerton Elementary District	Somerton	65	2,676	2%

Name	City	Number of AI/AN Students*	Total Number of Students*	Percentage
27. South Pointe Public Charter Elementary School	Phoenix	19	367	5%
28. University Public Schools Inc.	Tempe	10	584	2%
29. Valentine Elementary District	Peach Springs	54	75	72%
Nevada				
30. Carson City School District ^b	Carson City	178	7,805	2%
31. Churchill County School District	Fallon	230	3,923	6%
32. Douglas County School District ^c	Minden	226	6,286	4%
33. Nye County School District	Tonopah	115	5,605	2%
Utah				
34. Box Elder District	Brigham City	74	11,449	1%
35. Iron District	Cedar City	237	8,675	3%
36. Millard District ^d	Delta	28	3,006	1%
37. San Juan District	Blanding	1,546	3,030	51%
38. Sevier District	Richfield	175	4,769	4%
39. South Sanpete District	Manti	18	3,193	1%

a. Telephone survey respondent indicated that this district did not participate in Title VII.

b. Telephone survey respondent indicated that Title VII funds were turned over to the local tribe.

c. Telephone survey respondents indicated that they indirectly dealt with Title VII through the local tribe.

d. Telephone survey respondent anticipated receiving a Title VII award at the time of the interview, but this cannot be verified through <https://www.usaspending.gov/>.

Notes. Asterisk (*) Indicates 2011 data obtained from <https://nces.ed.gov/>. **Bold** indicates sites that received Title VII funding at least once between 2008 and 2013.

Appendix D: Title VII Needs Assessment Telephone Interview Protocol, July 2014

Hello my name is _____ and I am part of a team of subcontractors for the West Comprehensive Center at WestEd. Who would be the best person for me to talk to regarding Title VII Funding at your school or district?

(Transfer to appropriate staff member who is either directly knowledgeable about Title VII funding or knowledgeable about applying for grants in general).

My name is _____ and I am part of a team of subcontractors for the West Comprehensive Center at WestEd to collect some information for Indian Education Directors in states in the region (AZ, NV and UT). We would like to get your ideas about Title VII so that school and district access to and use of this funding can be improved. We are interested in your ideas as a district or school administrator about the application process, how this funding impacts schools, districts and students, and reporting requirements. The interview will take no more than 20 minutes.

This interview is voluntary, the information you provide will be kept completely confidential, and all information collected will be aggregated before it is reported. You can stop the interview at any time with no negative consequences, and your name will not be used in the report back to the West Comprehensive Center.

Do you have any questions before we begin?

1. What do you know about Title VII? If you know about it, how did you learn about Title VII?
2. Do you have Title VII funding now in your school or district? (go to number 2 if yes, go to number 8 if no)
3. **(If yes to Number 2):** Do you know what these funds are being used for? If so, can you describe or explain?
4. What kinds of assistance do you need to implement Title VII in your school or district?
5. What kinds of assistance do you need with reporting requirements related to Title VII?
6. What kinds of advice would you give state Directors of Indian Education about Title VII?
7. What kinds of assistance might be provided by the West Comprehensive Center?

8. **(If no to Number 2):** If you do not have Title VII funding, do you know why not?
 - a. Probe: Did you apply for it and not get it?
 - b. Probe: If you decided not to apply for it, why not?
9. What might prevent schools/districts like yours from applying for Title VII funding? Please explain.
 - a. Probe: If you decided not to apply for Title VII funding, what could be done to change your thinking about it?
 - b. Probe: What kind of help would you need to apply for Title VII funding?
 - c. Probe: What kind of help would you need to administer a Title VII program, based on what you know about it?
10. What advice would you give to state directors of Indian education about sharing information about Title VII?
11. What kinds of assistance might be provided by states to help schools/districts like yours apply for Title VII?
12. What kinds of assistance might be provided by the West Comprehensive Center to encourage schools/districts like yours to apply for Title VII?
13. Do you have any other advice or comments about Title VII?
14. Would you like to receive additional information about Title VII?

Thank you for your time!