

INTEROFFICE CORRESPONDENCE
Los Angeles Unified School District
Independent Analysis Unit

Memo

DATE: October 23, 2018

TO: Members, Board of Education
Austin Beutner, Superintendent

FROM: Glenn Daley, Director Independent Analysis Unit
Analyst: Dr. Q. Tien Le

SUBJECT: IDENTIFICATION OF AMERICAN INDIAN/ALASKA NATIVE STUDENTS

This memo responds to questions about the process for identifying American Indian/Alaska Native (AI/AN) students. When students enroll in the District, their parent/guardian fills out a [Student Enrollment Form](#) which asks for the students' primary race and additional race. This simple self-identification is what most statistical studies of District enrollment are based on.

However, self-identifying as AI/AN is **not** enough to qualify for Title VI Indian Education Formula Grant from the federal government. For a student to be counted for funding under the Title VI Indian Education Formula Grant, parents/guardians must complete [Form 506](#) which asks for the following information:

- Name of individual with tribal enrollment (must be a descendent in the first or second generation, and must be the student, a parent, or a grandparent)
- Name of tribe or band
- Proof of enrollment in tribe or band (via membership/enrollment number or other means)
- Name and address of tribe or band maintaining enrollment data

Since Form 506 requires parents/guardians to *provide proof of enrollment in tribe or band*, AI/AN counts obtained from the Student Enrollment Form are unlikely to match the counts obtained by Form 506. Some discrepancy is to be expected since it may be difficult for parents/guardians to access the information required by Form 506.

On the other hand, the Student Enrollment Form only allows selecting up to two race/ethnicity categories, while Form 506 allows a student to be identified as an Indian student down to the fourth generation (i.e., with a grandparent who has tribal enrollment as a descendent in the second generation). Thus, there may be students who meet the Form 506 criteria but who do not select AI/AN as a primary or secondary racial identification on the Student Enrollment Form.

Currently, there is concern about the declining number of students included in the tribally enrolled count for the Title VI Indian Education Formula Grant. One explanation for this decline is the District's implementation of a more comprehensive validation process for Form 506. *In the past several years, the District has made greater effort towards ensuring the completeness of Form 506 before submitting the final count of tribally enrolled students to the federal government*, resulting in the exclusion of some students who were previously included on the basis of an incomplete Form 506. Efforts are underway to obtain complete Form 506s and restore the correct status to these students where appropriate.

In sum, the process for identifying as AI/AN differs between the District's Student Enrollment Form and the federal government's Form 506, leading to differences in AI/AN counts. In addition, the District's process for validating Form 506 has changed in recent years, which may explain the declining number of students included in the count submitted for the Title VI Indian Education Formula Grant.