

Introduction: The concentration of Latinos¹ enrollment was first recognized by educators and policymakers in the 1980s and contributed to the invention of a new construct of institutions known as Hispanic-Serving Institutions (HSIs). These institutions were first recognized and defined in federal law in 1992 under the Higher Education Act (HEA) as follows: Hispanic-Serving Institutions are accredited and degree-granting, public or private nonprofit institutions of higher education with 25.0 percent or more total undergraduate Hispanic full-time equivalent (FTE) student enrollment.² At the time, the HEA included additional criteria for eligibility in a competitive institutional capacity-building grant program under Title III, Part A, section 316.

For more than 30 years, policymakers and institutional leaders have come to accept the HSI classification as socially and academically meaningful as well as a viable funding vehicle to improve the quality of education at institutions enrolling large concentrations of Latino students.

While federal law defines HSIs, the federal government does not designate institutions as HSIs. The U.S. Department of Education (ED) designates institutions eligible for the Developing HSIs grant program if they apply and meet the enrollment definition, as well as two additional criteria: high enrollment of needy students and low core expenses. Further, no government agency is charged with certifying an official list of HSIs. In Fall 2025, ED canceled \$350 million in HSI/MSI funding for FY25, and no active federal eligibility framework currently exists. As a result, the field has responded by creating multiple lists of HSIs developed for different purposes using definitions that vary from federal law. These multiple lists complicate efforts to establish a common understanding of HSIs, their strengths and needs, among researchers, policymakers, advocates, and students.

This essay provides a common definition and methodology for identifying HSIs that results in more accurate analysis. This essay also highlights the need for organizations to align on a single, clear definition of HSIs. For example, *Excelencia* in Education (*Excelencia*), a not-for-profit organization, has conducted research and worked with HSIs since its inception. Many researchers and others have used the same methodology for developing a list of HSIs to ensure accuracy and consistency in the community and for broader use by other federal agencies, researchers, and funders.

Background: HSIs first received federal funding in 1995 through the U.S. Department of Education to support improved capacity and academic quality at the institutions. In 1994-95, there were 189 institutions that met the HSI definition. In *Excelencia's* most recent analysis, 631 institutions met the definition of HSIs—an increase of 234 percent.³ As the number and attention to these institutions continue to grow, it is important to understand how HSIs are identified.

Definition: *Excelencia* creates the voluntary list of HSIs based on *Excelencia's* analysis applying the criteria for HSIs identified in Title V of the Higher Education Opportunity Act, as amended in 2008. As presented earlier, HSIs are defined in federal law as accredited and degree-granting public or private nonprofit institutions of higher education with 25 percent or more total undergraduate Hispanic full-time equivalent student enrollment.

¹ The terms "Latino" and "Hispanic" are used interchangeably.

² Summary of Title V of the Higher Education Act, as amended in 2008. To be eligible for the "Developing HSIs Program," the law further requires that an HSI have a high enrollment of needy students and low core expenditures.

³ As of 2025, *Excelencia* in Education has removed institutions from the list of HSIs that have less than 100 undergraduate students. See methodology below.

It is important to note that there is additional eligibility to participate in the Title V Developing HSIs grant. An institution must meet the enrollment definition provided and must also have a high enrollment of needy students and low core expenses. Our list does not include this additional program criteria since our HSI list has use beyond the Title V grant.

The constitutionality of HSIs is currently being challenged in federal court. In the interim, the current administration has signaled an intent to redistribute funds that Congress appropriated for Title V to Title III Strengthening Institutions Program (SIP). This redistribution of funding signals that HSIs will be competing for needed funds with more institutions from one pool of resources.

Data source: The data source *Excelencia* in Education uses to develop the annual list of HSIs is data from the National Center for Education Statistics' (NCES) Integrated Postsecondary Education Data System (IPEDS) maintained by the U.S. Department of Education. These data are self-reported by every institution of higher education participating in Title IV (federal student financial aid programs) and are publicly released with a one-year lag required for data collection. Publicly released IPEDS data can be accessed at <https://nces.ed.gov/>.

Methodology: The process for calculating a list of HSIs using IPEDS requires creating a custom data file using the latest year of institutional characteristics, enrollment, and completions data publicly released for 2- and 4-year public and private, not-for-profit, degree-granting, Title IV participating institutions. Puerto Rico is included in this dataset since HSIs there are accredited and eligible to receive both Title IV and Title V funding. Undergraduate fall enrollment data includes both full-time students and part-time students by race/ethnicity.

Once a custom file with these data has been created, undergraduate FTE student enrollment is calculated for institutions meeting the above criteria by race/ethnicity. Based on IPEDS policy, the FTE of the institution's part-time enrollment is calculated and then added to the full-time enrollment of the institution to calculate the total FTE. The FTE of part-time enrollment is estimated by multiplying the part-time enrollment by factors that vary by type and control of institution. The following multipliers are used by the NCES to create FTEs from part-time undergraduate enrollment.

Sector	Multiplier
Public 4-year institutions	.403543
Not-for-profit, 4-year institutions	.392857
Public 2-year institutions	.335737
All other sectors	.397058

Once these FTEs are calculated, the total undergraduate Hispanic FTE is divided by the total undergraduate FTE to calculate the percentage of undergraduate FTE that is Hispanic. To determine whether an institution meets the enrollment criteria of an HSI, data should then be further filtered on the percentage of undergraduate FTE Hispanic students. Institutions with a minimum of 25.0 percent undergraduate FTE Hispanic students are included in the HSI list. However, any institution whose program of study is entirely religious-based (e.g., seminary/divinity schools) is excluded from the HSI list because institutions with a sole mission to prepare students for religious purposes (ordination to serve as clergy or in Christian ministry) are not deemed eligible institutions. Institutions that have since closed after reporting their data to IPEDS are also excluded from the list, as well as institutions that offer only certificates at the

undergraduate level and not an associate's or bachelor's degree.⁴ Institutions that awarded no undergraduate degrees or only religious degrees are identified through IPEDS completions data.

Excelencia in Education has also removed institutions with fewer than 100 total undergraduate students enrolled from the list of HSIs since 2025. Enrollment at these institutions fluctuates enough year to year that HSI status can change based on a difference of one or two Latino students, which would produce inconsistent identification across years. For example, an institution enrolling 100 undergraduates needs 25 Latino students to meet the 25% threshold, meaning a single student's continued enrollment determines whether that institution appears on the list. The sustainability of these smaller institutions is limited, as their small enrollment signals a lack of viability and sufficient resources for operations long-term. Further, institutions of this size are unlikely to be competitive for Title V capacity-building funds relative to larger, more established institutions.

Conclusion: Since our founding in 2004, *Excelencia* in Education has created lists of HSIs starting from 1994 and will continue to conduct analysis to better understand the strengths and needs of these institutions and their impact on college access, retention, and completion for Latino and other underserved students.

Visit EdExcelencia.org/research for more information on HSIs or contact our staff at research@edexcelencia.org.

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⁴ For more information on criteria, please see [PL 110-315 - Higher Education Opportunity Act](#).