

KNOWLEDGE PAPER

MAXIMUM REPRESENTATION AT SCHOOL DISTRICTS

Maximum Representation is a set of policies and practices schools can implement to honor every dimension of a student’s identities throughout data collection, analysis, and reporting. These practices address longstanding issues around undercounting and misclassifying Native students. More specifically, when an American Indian/Alaska Native (AI/AN) or Pacific Islander (PI) student identifies with a race(s) or ethnicity(ies), their tribal affiliation and Native identity is often obscured in data. Similarly, multiracial and multiethnic students are often lumped into a “Two or More Races” category. This results in inaccurate educational research, undistributed federal education funding, and potential violations in government-to-government relationships with tribal nations. In addition, inaccurate data impacts school leadership’s understanding of Native students’ academic performances, disciplinary rates, postsecondary trajectories, and other assessments. **In the State of Washington, roughly 55,000 or 80%¹ of Native students are undercounted in public schools.** To learn more about the historical background of this issue and statewide recommendations, please refer to this [separate report](#).

Meanwhile, **this report focuses on how Washington school districts can apply Maximum Representation to support their students.** This report provides recommendations for schools’ interactions with Native families and caregivers, data practices, and tribal partnerships. The first section overviews the types of student demographics data that school districts collect (i.e., data around a student’s tribal affiliation, race, and ethnicity). Then, the following two sections outline recommendations for family engagement and school district data practices. Finally, we cover several Maximum Representation implications for tribal consultations and policy recommendations.

ABOUT THE WRITER AND PARTNERS

This knowledge report is a collaborative effort with Dr. Kenneth Olden, Amanda Rambayon, the Native American Parent Advisory Committee for Federal Way Public Schools Native Education Program (NAPAC), the Office of Native Education (ONE), and Washington STEM. This report emerged from conversations between the Office of Native Education (ONE) and Washington STEM staff members, particularly Dr. Jenée Myers Twitchell, Tana Peterman, Angie Mason-Smith, and Susan Hou.

This knowledge report is written in the format of a series of conversations. We do so to exemplify the relationships between the writer and partners, and at times we mention partners by their first names to signal how we refer to one another. However, we do so not to erase the immense expertise and training that each partner embodies. We also include the writer and partners’ tribal affiliations and settler relations to name the communities that we are accountable to and that have shaped our perspectives. The conversations took place between Susan Hou, a Washington STEM Community Partner Fellow, and our partners. Susan is a Han Taiwanese settler and a Ph.D. candidate at the University of Washington, College of Education. While Susan was the main person drafting this report, this report reflects a shared

¹ This figure was shared by Dr. Kenneth Olden and Elise Washines ABD, and the data was accessed from the Office of Superintendent of Public Instruction (OSPI) Comprehensive Education Data and Research System (CEDARS) on April 20, 2023.

effort that would not be possible without the collaborators' expertise and knowledge. This report exemplifies how Susan and the staff of Washington STEM are still learning alongside Native experts and communities. As an organization, Washington STEM owns up to the limits of our knowledge while we continue to gather resources to further the Maximum Representation conversation.

SCHOOL FORMS AND STUDENT DEMOGRAPHICS DATA

Data about students' identities, or student demographics data, first enters the system through school forms. Specifically, Washington schools and school districts collect student demographics data from these two forms:

1. **The Student Ethnicity and Race Form** collects information about the student's tribal affiliation(s), race(s), and ethnicity(ies)² and is provided to students and their families upon their enrollment.
2. **The American Indian Student Eligibility Certification Form for Title VI Indian Education Formula Grant Program (ED 506)** collects information about the student's and their family's tribal affiliation(s). This form is usually provided to students who identify as Native on the Student Ethnicity and Race Form.

The collected student demographics data records information about the student's race(s), ethnicity(ies), and tribal affiliation(s). For race, students are provided multiple options and can select several different racial identities at the same time. For ethnicity, students are asked whether they identify as "Hispanic/Latino". For tribal affiliation, students may fill in whether they or their family members are enrolled tribal members. Tribal affiliation is different from race and ethnicity because affiliation points to a student's political identity and their relation to tribal nations. Tribal nations have their own unique system of government, constitution, and legislations. For more, [the Native Governance Center](#) has a series of informative videos.

How is Title VI funding implicated by the ED 506 forms?

The second form, the ED 506 form, documents the number of students eligible for federal funding under Title VI. This funding is meant to support Native students in learning about their Native communities, languages, histories, traditions, and cultures through culturally sustaining curriculum, extracurriculars, scholarships, and career preparation resources. School districts receive Title VI federal funding for each eligible student who fills out the ED 506 form. However, since the form is not normally in the enrollment package, there is an undercount of Native students across Washington. School districts could be missing out on their appropriate share of federal funding. **We recommend that schools provide the ED 506 form to every student upon enrollment to ensure that schools receive their designated share of federal funding.** Students are also eligible for Title VI funding if they are an enrolled member or descendant of a federally- or state-recognized tribal nation. So, while a student's tribal nation is not recognized federally or in Washington, they may still be eligible for funding. Even if a school only has a few Native students, accurate data collection can increase a school's Native education programming capacity. Title VI programming at school districts can happen when schools have at least 10 Native students.

ACCURATE DATA COLLECTION AND ENGAGING WITH NATIVE FAMILIES/CAREGIVERS

To ensure accurate student demographics data collection, respectful engagement with Native families and caregivers is crucial to inform caregivers about the purpose of the school forms and to assist them in filling out the forms. The Native American Parent Advisory Committee for Federal Way Public Schools Native Education Program (NAPAC) provided valuable insight and recommendations about how schools could interact with Native caregivers. Federal Way Public Schools is one of the [most diverse](#) school districts in the U.S., with more than 120 languages spoken in the schools. The district is also the home base for NAPAC, a powerful group of Native student parents, grandparents, and caregivers

² Since publishing the last report, in March 2024 the Office of Management and Budget has [revised federal standards](#) for collecting and representing race and ethnicity data. One major relevant change is the newly combined race and ethnicity question, which makes "Hispanic or Latino" a racial category rather than a separate ethnicity question. This would potentially minimize the under-identification of Native and Hispanic/Latino students as only Hispanic/Latino. These federal changes are the first since 1977 and reflect efforts from federal agencies as well as long-term advocacy from Indigenous data experts and data coalitions, such as the [Indigenous Education State Leaders Network \(IESLN\)](#).

whose voices have created positive changes for their school district, such as [changing an inappropriate Native American school name](#) to Evergreen Middle School. Amanda Rambayon is the Title VI Coordinator at Federal Way Public Schools and one of the key people who brought NAPAC together. She is also an enrolled member of the Little Shell Tribe and a descendant of the Turtle Mountain Band of Chippewa. The following sections are based on a conversation with Amanda and a conversation during one of the regular NAPAC board meetings, where people shared homemade food, joked and poked fun at one another, and gushed over the brilliance of their kids and grandkids.

Relationships Matter When it Comes to Native Student Data

The most important theme emphasized repeatedly in the conversations is that **preexisting, caring relationships with Native parents, families, and caregivers are vital for good conversations, accurate data, and promoting effective changes at schools**. So much of Native student data collection comes down to trust and relationships between schools and Native caregivers, or as a grandparent at NAPAC said, **“Everything related to Native kids is about trust, or the lack thereof.”** Distrust because of legacies of colonial violences around formal identifications may also surface when filling in school forms. Relatedly, students and caregivers may decide not to provide information about their identities when they receive incomplete information about the purposes of the forms. As a last resort, [schools may complete the student forms on behalf of the students](#), but this may create errors and breaches of consent. Instead, listening and fostering genuine relationships with Native caregivers is the path forward. Amanda, the Federal Way Title VI Coordinator, emphasized that relational work such as home visits and calls are needed to clarify the form and build trust with Native caregivers. However, this can be taxing for Title VI Coordinators, especially since relational work often exceeds their work hours on paper.

Consistent and caring relationships in schools ensure that Native student needs are met and that their data is handled ethically. **“Relationships are the biggest things to bring people in,”** said a grandparent about how NAPAC came together. NAPAC is influential because it is a larger community of caregivers whose kids are at different grade levels in the school district. These larger webs of relationships support Native student enrollment and graduation rates. In addition, relationships help schools understand their students’ situations. For example, since the pandemic, there has

Here are several recommendations for school districts to build genuine relationships with Native students, families, and caregivers:

1. Increase Native representation in teachers, school staff, principals, superintendents, and general school leadership. Students need to see their identities reflected in the adults around them. Having Native representation from local tribal nations is particularly important.
2. Increase Native representation on advisory boards to facilitate conversations about Native student needs with school leadership. Continuous conversations and participation in community events can provide school leadership insights into Native students’ school experiences and needs.
3. Educate school leadership, staff, and teachers about tribal sovereignties and government-to-government relationships at principal meetings and staff meetings, particularly registrars and staff who manage student records. Often, race and tribal affiliations are falsely conflated with one another.
4. Educate teachers and advisors about the available Native education programs and resources on a regular basis so that they may share them with their students.
5. Minimize harm towards Native students. This includes addressing racism and holding students accountable for racial discrimination. This also means changing the names of schools and school spaces to prohibit stereotypes and inaccurate Native representations.
6. Create partnerships with local nonprofits that support Native students.

been significant student disenrollment in school districts across Washington. Preexisting relationships help schools understand why students disenrolled and whether they would like to re-enroll.

Recommendations Around School Forms and Native Student Data

Related to how school forms are shared with Native students, families, and caregivers, this report organized the following challenges and recommendations from speaking with NAPAC and Amanda. **In particular, providing a breakdown of the Student Race and Ethnicity Form questions would be helpful for Native students, families, and caregivers.** How a student self-identifies does not always align with whether they qualify for resources. Thus, providing additional information and breaking down the questions on school forms can be helpful. For example, instead of asking a student whether they self-identify as Native, it might be easier for a student to answer, “Is your mom, dad, parent, or grandparent Native?” Similar questions help to identify whether the student is eligible for certain resources, regardless of how they identify, which may change over time.

Here are some common challenges and recommendations for school districts when it comes to filling out school forms, both during and after a student is enrolled:

During Student Enrollment

Challenges	Recommendations
<p>Misinformation and miscommunication about the form questions and options.</p> <ul style="list-style-type: none"> In particular, this can happen with language barriers. Immigrant families might choose “American Indian” because it includes the word “American.” 	<p>Schools can create additional information to break down what the questions mean and the impact of the question responses. For example, create printed pamphlets to accompany enrollment packets or an online pamphlet to accompany online forms.</p>
<p>A Native student’s tribal affiliation is not on the form.</p> <ul style="list-style-type: none"> This can happen when the tribal nation is not federally recognized by the U.S. or the student is Native to lands and waters outside of the U.S. (e.g., First Nations in what we now call Canada, Indigenous Peoples of South and Central Americas). 	<p>While the student might not qualify for federal funding, schools can still add the students to listservs for Native education programs and resources. Schools must not decide whether or not a student is Native.</p>
<p>A Native student does not have legal documentation to prove their tribal affiliation(s).</p> <ul style="list-style-type: none"> This can happen when the student is in foster care and may have difficulties obtaining their documents. 	<ol style="list-style-type: none"> As mentioned above, schools can still add the student to listservs. To qualify for Title VI funding, a student needs to be enrolled or have a parent or grandparent who is enrolled in a federally recognized tribe, a state recognized tribe, a terminated tribe, or is Alaska Native. Proof of membership or enrollment number (if readily available) is required. Several other sources of federal funding, such as Title III, only require self-identification.

After Student Enrollment

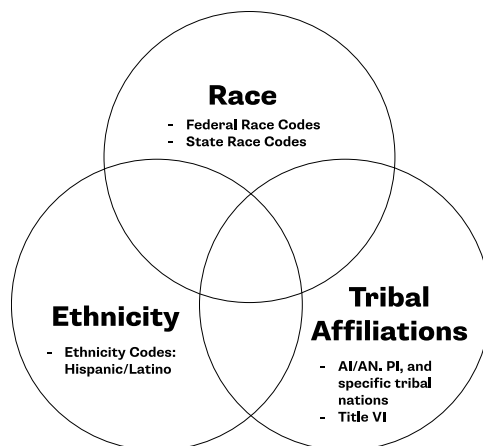
Challenges	Recommendations
<p>Often, caregivers and students are not informed that they can request edits to their identifications post-enrollment.</p>	<p>Schools can regularly remind caregivers and students to update their forms, for example, at parent-teacher conferences.</p>
<p>When tribal nations update citizenship requirements, students might then change their legal tribal affiliation(s).</p>	<p>Schools can follow up with students when tribal nations update their citizenship requirements or when a student’s siblings or cousins change their tribal affiliations.</p>
<p>A Native student chooses not to identify as Native on the form.</p>	<ol style="list-style-type: none"> 1. Teachers need to be aware of their students’ identities and lived experiences so they can share Native education programs and resources when appropriate, regardless of whether they choose to self-identify on the form. 2. School districts can promote Native education programs and community events throughout the whole school district so that Native students and families can still access resources.

ACCURATE DATA REPORTING AND MAXIMUM REPRESENTATION DATA PRACTICES

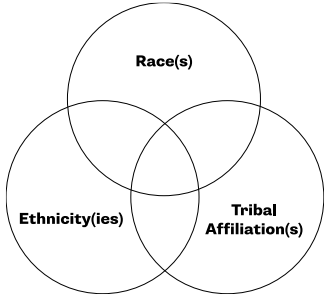
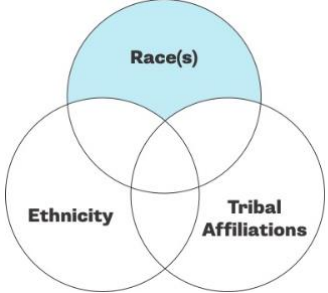
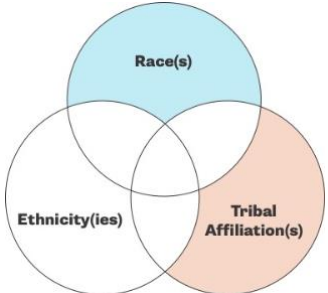
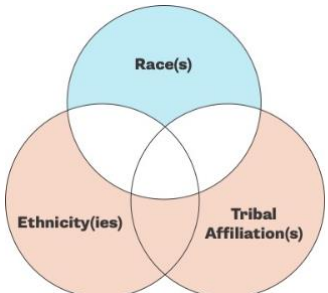
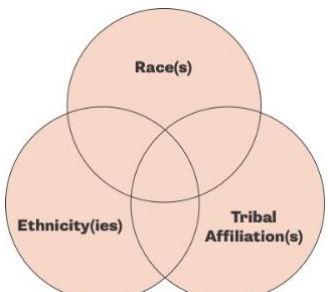
This section focuses on data strategies and practices to apply Maximum Representation to student demographics data at school district levels. In other words, this section outlines how to work with data collected from the school forms to ensure that students’ identities are fully represented. This section is based on a conversation with Dr. Kenneth Olden, who is the Director of Assessment and Data at Wapato School District. He is also a Descendant of the Yakama Nation as well as a data analyst who has been working on creating these data best practices for years.

While each school district may store student demographics data in a different data storage system, there are some similarities and generalizable data guidelines. Kenneth’s school district uses Skyward as their data storage system and he has created various [manuals](#) that describe the exact steps to download data from Skyward and apply Maximum Representation to the data. Below is also a generalizable process for other data storage systems. In general, there are three different axes for each student’s identities: race, ethnicity, and tribal affiliation. Typically, school districts can download student demographics data related to race (federal race codes, state race codes), ethnicity (Hispanic/Latino or not), tribal affiliations (AI/AN, Pacific Islander, and specific tribal nations), and whether the student qualifies for Title VI (see Figure 1). Additionally, it can also be helpful to cross-reference the languages spoken at home.

Figure 1. Student identities and corresponding student demographic data in school districts.



A Generalizable Process to Apply Maximum Representation to School District Data

<p>1. Download the student demographics data as a spreadsheet from the school district’s data storage system (e.g., Skyward). Then create a new column in the spreadsheet. In the next fill steps, fill in this new, empty column with identities that align with Maximum Representation.</p>	
<p>2. Students with one racial identity: Fill in the new column with the racial codes of students who only identify with one racial identity.</p> <ul style="list-style-type: none"> This is done by filtering out Hispanic/Latino students, AI/AN students and multiracial students. You are then left with students who only identify with one race. It can be helpful to check whether the students who identify only with one race speak Spanish at home. If they do, they might also identify as Hispanic/Latino. 	
<p>3. Students who only identify as AI/AN or PI: Fill in the new column with the tribal affiliation(s) for students who only identify as AI/AN or PI.</p> <ul style="list-style-type: none"> This is done by filtering out students who listed any race(s) or ethnicity(ies). You are then left with students who only identify with AI/AN or PI. Of the students who only identify as AI/AN or PI, make a note about whether they qualify for Title VI on the form. If they do not, it can be helpful to reach out to them and ask if they would like to fill out the ED 506 form. 	
<p>4. Students who identify as Native and Hispanic/Latino: Fill in the new column with students who identify as AI/AN or PI and Hispanic/Latino, or only Hispanic/Latino.</p> <ul style="list-style-type: none"> This is done by filtering out students who listed a race(s) or already have an identity filled into the new column. You are then left with students who identify as Hispanic/Latino and might also identify as AI/AN or PI. 	
<p>5. Students with multiracial (and multiethnic) identities – Fill in the remaining blanks with all the racial and ethnic codes that the student identifies with.</p> <ul style="list-style-type: none"> For all the remaining empty cells in the new column, fill in the student’s identities by referring to their race(s), ethnicity(ies), and tribal affiliation(s). This includes multiracial students and students who identify with a race and also with Hispanic/Latino³, AI/AN, or PI. 	

³ Since students must fill in an option for their racial identity, some students who only identify as Hispanic/Latino fill in the “White” race code as their default.

While there are federal standards in reporting aggregated student identities, there are no legal limitations from disaggregating student identities at state and school district levels. **We highly recommend disaggregating student demographics data to better support students and to advocate for funding and policy changes.** For example, it can be helpful to report that there are significant student numbers from a certain tribal nation, a certain group of multiracial students, or a specific country of origin. In addition, when students identify as AI/AN and yet do not report that they qualify for Title VI funding, the school can follow up with these students to ensure that the school receives all the federal funding they qualify for.

HONORING TRIBAL PARTNERSHIPS WITH REGARDS TO NATIVE STUDENT DATA

While an entirely new report could be written about tribal consultations with school districts, in this report we touch upon some key topics relevant to Native student data. **Tribal nations often do not have real-time data about their Native kids in public schools.** Data is usually accessed a year later through school report cards, which makes it difficult for tribal nations to understand Native student performances at the given moment. To gain access to real-time data, tribal nations must create data agreements with every school district in Washington. This is a labor-intensive process in contrast to how several states, such as Minnesota and Wisconsin, have direct relationships between the state government and tribal nations. Currently, data sharing agreements are still necessary in the State of Washington to honor government-to-government relationships with tribal nations.

As a Title VI Coordinator, Amanda shared various insights about supporting sustainable and respectful relationships between school districts and tribal nations. **There needs to be cultural awareness and respect when working with tribal nations.** For example, there needs to be an understanding that some school district policies and procedures, such as collecting fingerprints for background checks, may violate the cultural norms of tribal partners and the Native community. In addition, when working with tribal nations around Native student data, it is also important to recognize data sovereignty, that **Native student data rightfully belongs to tribal nations, and that requesting funding from tribal nations to support data sharing would then be inappropriate.** Continuous conversations and tribal consultations are needed to foster a respectful space for schools and tribal partners to learn about one another. It can also be helpful to designate points of contact at the school for tribal partners and clarify the school's capacity and timelines for addressing requests.

Training and professional development can help school districts reframe tribal consultations as working alongside, rather than leading, tribal nations. Further resources for government-to-government trainings can be found at [Washington State School Directors' Association \(WSSDA\)](#), [Governor's Office of Indian Affairs \(GOIA\)](#), and the [Office of Native Education \(ONE\)](#) (ONE's trainings are only open to school administrators).

POLICY RECOMMENDATIONS

- **Increase funding for Native education programs and resources in school districts.** Title VI funding per student has stayed relatively the same over decades, despite inflation.
- **Increase funding for Title VI Coordinators and create additional positions to support Native student education programs in school districts.** There needs to be additional capacity for data management, family engagement, and education program creation and management.
- **Disaggregate student demographics data for a more accurate understanding of student performance and needs.** While federal reporting requires aggregate categories, school districts can disaggregate data to create inclusive counts of Native students and even counts of students affiliated with each specific tribal nation.
- **Increase data analysis and research capabilities at both school districts and tribal organizations to enact Maximum Representation at the school district level.** This includes having the capacity to have regular data quality assessments.