

Beyond Enrollment: Black-Serving Policy Challenges in Hispanic-Serving Institutions Today

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Achievement Gaps: Black Students at HSIs

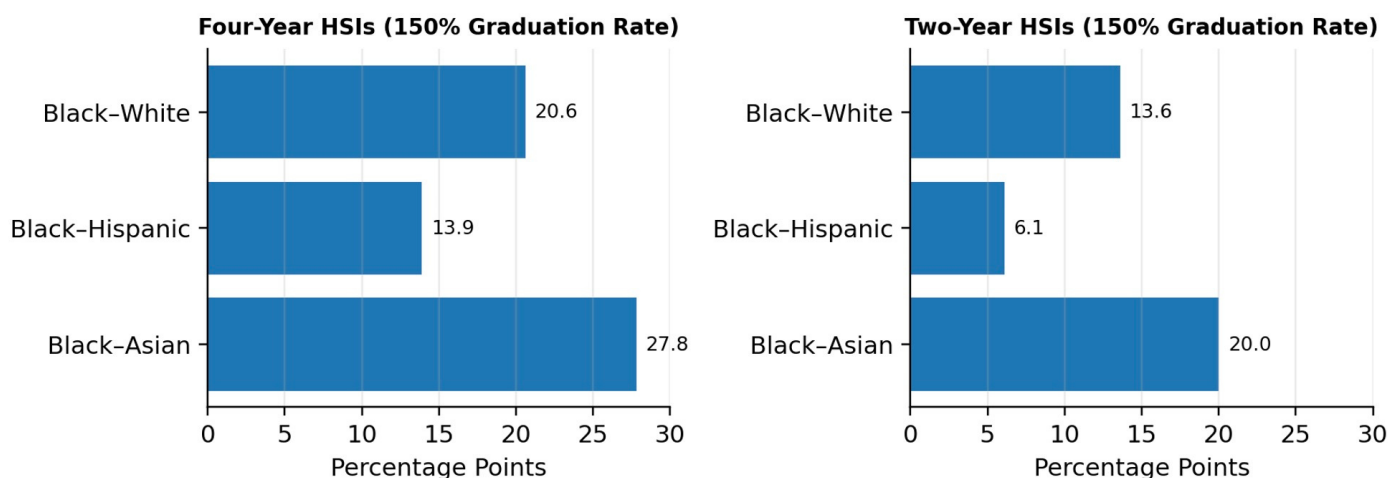


Figure 1. Achievement gaps in graduation rates for Black students at Hispanic-Serving Institutions, by race/ethnicity and sector, 2017-18 cohort. Source: National Center for Education Statistics, Integrated Postsecondary Education Data System, Graduation Rate Survey, 2017-18 cohort. Note: Gaps are expressed in percentage points relative to comparison groups and reflect 150 percent time-to-degree measures.

*The innovation gap is **not** a reflection of diminished inventive capacity. It is the predictable outcome of structural exclusion.*

Introduction

In California, a new policy designation to define what it means for colleges to serve Black students went into effect in 2025. The bill, SB 1348, introduced a statewide Black-Serving Institution designation. It stems from a growing concern that postsecondary institutions enrolling Black students are not always designed to meet their needs. The policy offers a measurable solution: define serving through enrollment baselines and hold institutions accountable (California State Assembly Committee on Higher Education 2024).

Enrollment-based designations are a starting point, but they fail to convey the need to pair access with appropriate supports. This is especially important in Hispanic-Serving Institutions, federally designated colleges enrolling at least 25 percent Latino students, which serve multiple student populations (Doran and Aguilar-Smith 2025). Policies shape funding, recognition, and accountability. Misalignment risks perpetuating inequalities.

Presence does not guarantee full citizenship. Students can be enrolled without being supported. Access does not mean equitable outcomes. When enrollment is used as a proxy for serving, it can cloud the efforts that determine student persistence, completion, and success.

The question is not whether institutions enroll Black students, but whether they are structurally organized to support Black students' success.

Policy Overview: What Black-Serving Institution Policy Requires

Under the new policy, colleges qualify in one of two ways. They can have at least 10 percent students who are Black or at least 1,500 Black students enrolled. The BSI designation requires a Black student success plan aligned with the institution's mission, written certification from the campus leader, key performance indicators over the five-year designation period, and documentation of resources to support the plan (California State Assembly Committee on Higher Education 2024).

Institutions must support structures promoting Black student success. This can include an African American Studies program, affinity centers or cultural support spaces, co-curricular learning programs, and outreach and support services.

Institutions must provide outcomes data. Four-year institutions must provide graduation rates for all students and Black students, completion rates within normal time and 150 percent time to degree. Community colleges must report degrees and certificates earned, completion rates, transfer data to four-year institutions, and data disaggregated for Black students.

Evaluations for the BSI designation will cover five domains: mission and leadership commitment, representation and belonging, student outcomes, curriculum and co-curricular learning, and student support and wellness.

The BSI policy designation aims to address historic underperformance for Black students. A lack of accountability has undermined Black student success. The quantifiable metrics of this policy will be actionable for policymakers because of their simplicity, comparability, and scalability.

Status: Enrollment Access Without Equal Outcomes

There are gaps in completion, transfer, and post-college outcomes for Black students nationally. Black students attending four-year institutions graduate within six years at a rate of 46.0 percent compared to 64.6 percent for all students. At two-year institutions, Black students graduate within three years at a rate of 25.3 percent compared to 34.1 percent for all students (Postsecondary National Policy Institute 2025).

These gaps persist even at Minority-Serving Institutions like Hispanic-Serving Institutions. At four-year HSIs, Black students graduate at a rate of 40.7 percent, compared to 54.6 percent for Hispanic students, 61.3 percent for white students, and 68.5 percent for Asian students. At two-year HSIs, Black students graduate at a rate of 14.5 percent, compared to 20.6 percent for Hispanic students, 28.1 percent for white students, and 34.5 percent for Asian students (National Center for Education Statistics 2017–18).

These figures illustrate institutional gaps across institution types. They do not merely show differences in student outcomes. They show that access alone is not enough. They reveal institutional gaps that enrollment-based designations do not remedy. What is revealed is that the problem is not just about who colleges enroll, but how they are organized to support students.

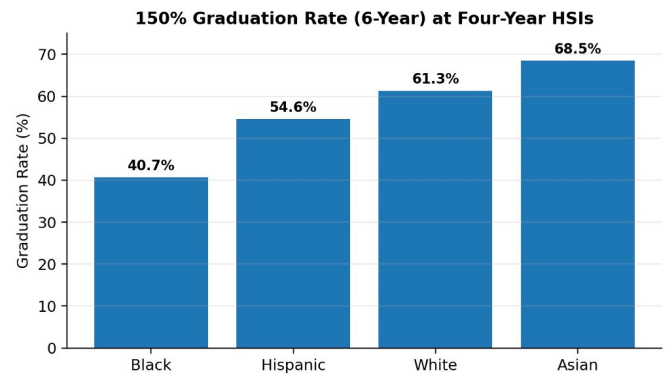


Figure 2. Black student completion gaps at four-year Hispanic-Serving Institutions demonstrate why enrollment-based designations alone cannot substitute for Black-serving accountability. Source: NCES IPEDS, Graduation Rate Survey, 2017–18 cohort.

Criteria: What Serving Black Students Requires

Serving students is about more than a designation. It requires structural alignment and appropriate resources for the work.

A Black-Serving Institution designation should not function only as a recognition of enrollment. It should evaluate whether institutions have the structures needed to support Black student success. This includes mission and leadership commitment, representation and belonging, student outcomes, curriculum and co-curricular learning, and student support and wellness.

Policy must move beyond access and interrogate outcomes on completion rates, transfer rates, and workforce earnings data. Institutions should focus on evaluating supports that make these outcomes possible. Funding should be aligned to support serving practices like integrated advising supports, basic needs frameworks, and targeted retention programs tied to clearly defined outcomes.

The credibility of equity policy depends on whether institutions are accountable not only for enrolling Black students, but for supporting their persistence, completion, transfer, and success.

Interpretation: Where Equity Policy Strains

This policy has not yet produced definitive outcome data. As BSIs are in the early stages of implementation, it will take time to assess the impact on graduation, transfer rates, workforce earnings, institutions hiring staff, and the building of programs and support systems (Vuong and Hairston 2012). Higher education is also changing. More students are pursuing shorter credential programs, the financial landscape is shifting, and workforce connections are moving (Lumina Foundation and Gallup 2025). Understanding BSIs will take time.

The challenge is that colleges do not operate within neat categories. HSIs enroll 5.6 million students and 33 percent of all undergraduate students nationwide. They enroll more Black students than all Historically Black Colleges and Universities combined and enroll the majority of undergraduate Hispanic students (Hispanic Association of Colleges and Universities 2018, 2025).

HSIs serve Latinx students and enroll diverse populations. Adding a new designation does not dismantle the existing mission. It renders visible a tension policy does not rectify. BSI policy aims to draw clean lines; colleges do not exist that way. In practice, colleges serve overlapping communities with distinct needs that do not fit neatly into policy designations. This misalignment is where the policy strains.

HSIs also enroll Black students, Indigenous students, Asian students, undocumented students, parenting students, and low-income students. They have a broader mission than their federal designation suggests (Espinosa, Kelchen, and Taylor 2018; Aguilar-Smith 2024; Rodrigues 2023).

These institutions are expected to meet many needs with limited resources. Funding for the BSI policy is not established but is under consideration, without sustained financial support. HSIs face resource challenges including funding limits, staffing constraints, and competing priorities. Support services are stretched thin across populations. New expectations do not automatically come with new capacity and support (Sanchez 2026; Watson 2025).

This is not a matter of institutions serving a particular identity. It is about structural barriers. While policy identifies categories, institutions must manage realities on the ground. It is in that gap where inequity lives.

The complexity of HSIs should not dilute institutional accountability to Black students. It should clarify why Black-serving policy must be tied to structures, resources, and outcomes.

Case Study: Compton College and the Limits of Enrollment Alone

Compton College reflects intentional institutional design. Serving students' needs is realized with sustained commitment and real investment, not assumed through enrollment.

The strain of the single-identity enrollment designation is visible at Compton College, a public Hispanic-Serving community college in Compton, California. The college sits in a community that was once one of America's most

vibrant Black cities. Compton College sits at the intersection of shifting demographics and inequities in the Compton community.

Compton's history has endured years of racial and economic inequality. Prior to World War II, Compton was 95 percent white. A demographic shift saw more Black families arrive through the 1960s, eventually becoming a 72 percent majority Black city by 1972. It has since experienced another cycle of demographic change in recent decades. Three out of four Compton residents today are Latinx, while the Black population is approximately 24 percent. The Latinx population increased dramatically in the late twentieth century, becoming the majority by the 2010s (Pascual 2019; U.S. Census Bureau n.d.).

Compton College leaders are working hard to respond to this complexity. The college has earned a reputation for developing programming that meets the holistic needs of students. The college has built a constellation of supports that address students' basic needs and academic success, including access to food, health care, affordable on-campus housing, and comprehensive advising structures (Marshall 2025).

Compton College hired its first director of Black and Males of Color Success in 2021. What Compton College illustrates is that serving students is not a passive enrollment result but an active leadership decision for the institutional project. These targeted programming supports reflect a system built around students' needs. These are not performative gestures; they are structural commitments. And they illustrate what enrollment-based policy alone cannot deliver.

Compton College demonstrates both the possibility and the challenge of Black-serving practice within an HSI context. It shows that institutions can respond to overlapping student populations, but only when support is intentional, resourced, and tied to measurable outcomes.

Outlook: Moving from Enrollment to Accountability

An emphasis on enrollment-only metrics produces shallow accountability. When institutions meet designated enrollment standards without building structures needed to support student success, they contribute to inequities in completion, transfer, and persistence outcomes. Policy must move beyond access and interrogate outcomes on completion rates, transfer rates, and workforce earnings data.

Institutions should focus on evaluating supports that make these outcomes possible. Funding should be aligned to support serving practices like integrated advising supports, basic needs frameworks, and targeted retention programs tied to clearly defined outcomes.

Policy must also evolve to recognize the needs of multi-serving institutions. Colleges like HSIs serve overlapping demographic groups with distinct needs. An improvement on current frameworks would account for the complexity on the ground and provide appropriate supports rather than viewing institutions through one-dimensional identity designations.

But the recognition of institutional complexity cannot become a reason to obscure Black student outcomes. It must become a reason to measure them more clearly.

The development of Black-Serving Institutions signals a shift in how leaders are thinking about equity in higher education. Enrollment access is not enough. Postsecondary institutions must be accountable for how they support students.

More than the effectiveness of BSIs is at stake. This is about the credibility of equity policy. When policy focuses on enrollment as a proxy for support, it perpetuates the very inequities it seeks to mediate.

Conclusion

HSIs show that colleges do not operate within neat categories. They serve overlapping student populations, with scarce resources and complex demands. But the question is not whether institutions enroll Black students. The question is whether they are structurally organized to support Black students' success.

Colleges demonstrate this work is possible and necessary, but only through intentional leadership, thoughtful coordination, sustained investment, and a reimagination of how institutions serve.

Presence does not guarantee full citizenship. Students can be enrolled without being supported. Access does not mean equitable outcomes. A Black-serving policy framework must therefore do more than count Black students. It must ensure that institutions are accountable for Black student persistence, completion, transfer, belonging, and success.



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