POLICY BRIEF

OCTOBER 26, 2026

SBCTC AGENCY PRACTICE FOR MAXIMUM IDENTIFICATION ON AMERICAN INDIAN AND ALASKA NATIVE STAFF AND STUDENT DATA REPORTING

Executive Summary

This proposal outlines the SBCTC's agency-initiated practice to adopt Maximum Identification (MaxID), duplicated reporting for American Indian and Alaska Native (AIAN) counting in internal and external staff and student data reporting. Under current federal race reporting requirements, individuals who identify as American Indian or Alaska Native in combination with one or more other races are classified in the 'Two or more races' (2+) category instead of the AIAN alone category. This leads to the undercounting, and underrepresentation of Native staff and students, rendering them statistically invisible in standard reporting.

The agency is implementing an internal practice that requires MaxID reporting on AIAN staff and students—capturing all individuals who identify as AIAN, whether alone or in combination with another race—alongside the standard federal unduplicated counts. Ultimately, SBCTC hopes that colleges will follow by adopting the same practice in their publication of AIAN data, and that the agency will adopt this practice as and agency policy.

Why This Matters

Tribal Nations are sovereign political entities, and through MaxID, sovereignty is acknowledged and respected by providing accurate counts of Tribal members in the CTCs system.

Federal race categories were designed for civil rights compliance reporting, not for understanding the full scope of AIAN representation.

Multiracial AIAN individuals have equal claims to AIAN identity, community membership, and culturally responsive services, including federal based services.

Exclusive reliance on unduplicated federal categories perpetuates undercounting and can misdirect equity resources.

This practice corrects the record at the agency level while maintaining full federal reporting compliance.

COMMUNITY AND TECHNICAL COLLEGES
Washington State Board

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Except where otherwise noted

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Background and Problem Statement

Federal Race Reporting and Its Limitations

Federal race and ethnicity reporting standards—established under the Office of Management and Budget's (OMB) Statistical Policy Directive No. 15 and implemented through the U.S. Department of Education's race/ethnicity collection guidance—require that individuals who select two or more races be reported in a single, aggregate '2 or more races' category for federal purposes. This unduplicated counting method prevents double-counting across racial groups and satisfies federal civil rights reporting requirements.

However, this approach has a significant consequence for AIAN populations: individuals who identify as AIAN and any other race are classified as '2+' and are removed from the AIAN count entirely. Their Tribal identity, cultural affiliation, and eligibility for AIAN-specific services and programs are rendered statistically invisible in standard reports.

The Scope of Hidden Native Representation

Nationally and in Washington State, a substantial proportion of people who hold AIAN identity—including enrolled Tribal members and Tribal descendants —are multiracial. This reflects both the historical reality of Indigenous communities and the lived experience of contemporary Native peoples. The practical effect in agency data is that the reported 'AIAN' count materially understates the number of AIAN individuals the agency serves or employs.

The gap between the federal AIAN count and the MaxID (duplicated) AIAN count represents real people whose needs, experiences, and outcomes may not be captured in equity analyses, program evaluations, or outcome assessments that rely solely on standard federal categories.

Relationship to Federal Reporting Requirements

This practice does not alter how the agency fulfills its federal reporting obligations. Federal reports will continue to use the standard unduplicated OMB categories, including the '2+ races' classification, exactly as required. The MaxID, duplicated, AIAN count is an additional, internal analytical layer—used alongside, not in place of, federal counts. Both counts will be presented together wherever AIAN data is reported, clearly labeled to avoid confusion.

Proposed Agency Policy

The practice defined above will be brought forward as a proposal for SBCTC Agency policy.

Policy Statement

Proposed Policy Language (Draft)

It is the policy of SBCTC to provide MaxID (duplicated) counts of American Indian and Alaska Native (AIAN) staff and students—defined as all individuals who identify as AIAN, whether alone or in combination with one or more other races—wherever race and ethnicity data are reported internally.

MaxID (duplicated) AIAN counts shall be presented alongside the standard federal unduplicated race/ethnicity counts. Both counts shall be clearly labeled to distinguish between: (1) the federal unduplicated count, which follows OMB Statistical Policy Directive No. 15 requirements; and (2) the agency's inclusive duplicated count, which includes all individuals with AIAN identity regardless of multiracial status.

This policy applies to all internal and external reports, dashboards, equity analyses, program evaluations, and other publications that include race and ethnicity data. It does not modify how the agency fulfills any federal or state reporting obligation.

Scope of Application

This policy applies to all internal data contexts where race and ethnicity are reported, including:

- Employee data reports: hiring, classification, compensation, promotion, retention, and exit data
- Student and program participant data: enrollment, completion, outcomes, and service utilization
- Equity analyses and dashboards distributed internally or externally
- Grant and program reports prepared for internal purposes (separate from required federal submissions)
- Any ad hoc data reports or analyses that include race/ethnicity breakdowns

Reporting Format Standard

To implement this policy consistently, the agency will adopt the following display convention for any table or visualization that includes American Indian and Alaska Native data:

Table: Reporting Format Standards

Race/Ethnicity Category	Federal Unduplicated Count	Agency Inclusive Count
Am. Indian / Alaska Native (alone)	Included	Included
Am. Indian / Alaska Native (in combination)	Counted in '2+ races'	Included
2 or more races	Includes AIAN combinations	Includes AIAN combinations *
All other categories	As reported	As reported
Where cell sizes are too small for reliable reporting, standard suppression rules apply to both counts equally.		

* Note: '2+' in the inclusive column may still include other multiracial combinations not involving AIAN.

Rationale and Equity Justification

- **Self-identification is the foundation of race data collection.** An individual who identifies as AIAN—regardless of what other racial identities they also hold—has expressed a Native identity, or specific Tribal Affiliation, that carries meaning for their experience, potential service needs, and representation. Excluding them from AIAN counts based on multiracial status contradicts the principle of self-identification.
- **Undercounting perpetuates invisibility.** When AIAN staff and students are absorbed into the '2+' category, equity analyses may fail to identify disparities, program needs, or representation gaps that disproportionately affect AIAN peoples.
- **Duplicated counting is established practice in other equity contexts.** Multiple states, Tribal nations, and research institutions have adopted inclusive or duplicated AIAN counts specifically because

standard federal categories are widely recognized as inadequate for understanding AIAN representation.

- **This approach has minimal cost and requires few system changes to implement.** All information needed to produce the inclusive count already exists in the agency's data systems, as individuals' full multiracial selections are collected at intake. Implementation requires only a reporting convention, not new data collection. Changes will need to be made to existing system dashboards.

Agency Implementation Plan

Implementation Phases

Phase	Activity	Timeline
1 — Policy Adoption	Finalize policy language; obtain agency director or appropriate authority sign-off; communicate policy internally, and submit to agency Policy Review Committee.	Fall 2026
2 — Data Audit	Identify all existing reports, dashboards, and recurring analyses that include race/ethnicity data; flag those requiring update.	Fall-Winter 2026=27
3 — Reporting Updates	Update templates, dashboards, and standard reports to include duplicated Native counts per the display convention in Section 3.3.	Winter-Spring 2027
4 — Staff Training	Communicate to agency data analysts and report authors on the policy, display convention, and suppression rules. Develop a brief research brief and reference guide.	Winter 2027-Fall 2027
5 — Quality Review	Audit updated reports for consistency and accuracy; correct any errors before public or leadership distribution.	Spring-Summer 2027
6 — Ongoing	Apply policy to all new reports and analyses as standard practice. Review annually for consistency with evolving state and federal standards.	Ongoing

Risks and Mitigations

Risk	Likelihood	Mitigation
Confusion between duplicated and unduplicated counts in reporting	Medium	Consistent labeling convention (Section 3.3); staff training; one-page reference guide
Suppression issues in small populations	Low–Medium	Apply existing cell-size suppression rules equally to both counts; note suppression explicitly
Inconsistency across agency units over time	Medium	Policy formalization, designated data steward accountability, and annual review
Misinterpretation of inclusive count as replacing federal count	Low	Clear documentation that federal reporting is unchanged; both counts always shown together

Success Measures

- All internal race/ethnicity reports produced a policy effective date include a MaxID (duplicated) AIAN count alongside the federal unduplicated count.
- Staff responsible for data reporting can correctly explain the difference between duplicated and unduplicated AIAN counts.
- Equity analyses identify any previously hidden disparities or representation gaps among multiracial AIAN staff or students.