



EXAMINING NEVADA'S NATIVE AMERICAN FEE WAIVER:

STUDENT AND ADMINISTRATIVE EXPERIENCES AND IMPACT

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EXECUTIVE SUMMARY

In 2021, the Nevada System of Higher Education (NSHE) implemented the Native American Fee Waiver Program across select NSHE institutions. It is currently one of four fee waiver programs available in the state to support specific groups who meet eligibility requirements by offering financial support through waived tuition and fees. Nevada is one of many states that have developed and implemented a fee waiver program in recent years for Native American students who are Tribal Citizens or descendants. A greater awareness of Indigenous issues has been growing among institutions in Nevada; for example, many institutions have leaned into the land acknowledgement movement, which aims to recognize Indigenous peoples as the original stewards of lands on which universities continue to operate and derive economic benefit. Offering financial assistance is one of many cited mechanisms for reparations in higher education institutions situated on homelands from which Indigenous communities were dispossessed. The increasing number of fee waiver recipients, along with student feedback on the program's benefits to both themselves and their families, underscores the program's success.



However, there is currently limited published research on the broader impact of the program and student experiences in participating institutions. To address this gap, this research: (1) examines how many Native American students have utilized the fee waiver; (2) identifies those who were eligible but did not use it; (3) reviews the reasons behind their decisions; and (4) explores barriers or challenges related to this program. These findings may help identify and address obstacles to further access for eligible students and streamline implementation across institutions.



KEY FINDINGS FROM THE STUDY

Complex Processes: Administrators and students report processing difficulties due to the different departments and offices involved. These offices include financial aid, admissions, registrar, cashier's office, and other services dedicated to helping students with the fee waiver. All of these offices must coordinate at different points in the process, which is unclear to students and leads to feelings of confusion and frustration.

Inconsistent Institutional Support: Staffing varies across institutions, including the roles and departments designated to help fee waiver students. Larger institutions have dedicated offices, while smaller ones rely on nesting support within other departments and offices (e.g., financial aid). However, this poses problems when there is turnover, and there is no longer a point of contact to provide additional support.

Gaps and Cultural Competency: It was expressed by both administrators and students that misconceptions surround the fee waiver and that a better understanding of the historical context of federally-recognized tribes is needed. Students across all institutions discussed the importance of cultural context and shared similar values of trust, family, community, and representation.

Inconsistent Outreach Methods: The ways in which universities engage in outreach activities vary. Methods depend on several factors, including institution size, funding, staffing, and processing systems. Institutions reported the need to improve outreach efforts outside of Nevada.

Additional Financial Costs: Both students and administrators discussed how the fee waiver helps to alleviate the financial burden of attending college. However, students must still apply for additional scholarships, awards, and private support including seeking employment to afford living expenses to attend college.



Key Policy Recommendations

1. Establish dedicated fee waiver offices or roles
2. Increase staff training
3. Strengthen tribal relationships
4. Automate identification systems
5. Increase post-enrollment engagement
6. Provide legislative funding
7. Create clear policies
8. Expand scholarship caps
9. Maintain a “first-dollar” structure
10. Standardize data collection



HISTORICAL AND LEGISLATIVE CONTEXT

The Native American Fee Waiver in Nevada reflects the intersection of federal Indian policy, the historical development of the Nevada System of Higher Education, and recent legislative efforts to improve educational access. Its establishment is grounded in a long history of federal policies that shaped the educational opportunities available to Native students who are federally-recognized tribal citizens or descendants, as well as in the unique structure and mission of Nevada's higher education system.

Topics discussed in this report are meant not only to provide an overview of current policies and perceptions surrounding the NSHE's Native American Fee Waiver, but also to facilitate a better understanding of the historical context related to such policies. The content presented in this report may be considered culturally sensitive. The history of many Native Nations within the United States is complex and includes violent acts and atrocities against them. This is evident especially during the documented era of Indian boarding schools and continues to occur today as indicated by the Missing and Murdered Indigenous People Crises. Indigenous People continue to be resilient despite past and present injustices.

TERMINOLOGY

This report utilizes terms such as American Indian, Indian, Indigenous, Native, and Native American interchangeably to refer to descendants of North America before European contact or colonization. Such use of interchangeable terms is a common practice in daily use and scholarly literature. Additionally, terms such as tribes, tribal, and nations are also utilized and are inclusive to bands, clans, colonies, councils, communities, and villages. We acknowledge that identifying language is complex, personal, political, and encompasses a wide range of cultural variables.

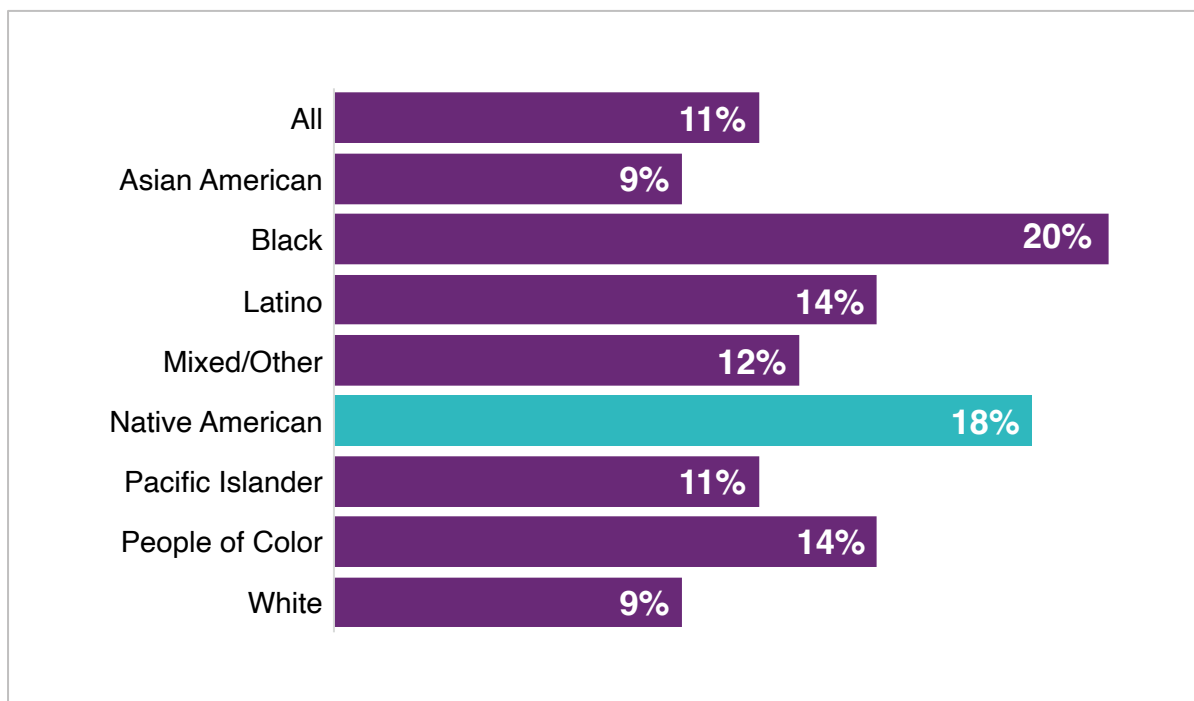


NEVADA CONTEXT

Nevada is home to more than 62,000 Urban Indians and 20 federally recognized tribes, including the Waši-šiw (Washoe), Numu (Northern Paiute), Newe (Western Shoshone), Nuwuvi (Southern Paiute), and Pipa Aha Macav (Fort Mojave). These communities maintain enduring connections to the lands that now host Nevada's institutions of higher learning and extend to 28 tribes when including Band and Community Councils (DNAA, n.d.). Despite these longstanding ties, Native students in Nevada continue to experience persistent disparities in higher education access

and attainment. In 2022, 18 percent of Native Americans in Nevada lived in poverty, compared to 12 percent of the state's population overall (National Equity Atlas, 2025). Graduation data from the Integrated Postsecondary Education Data System (IPEDS) further illustrate these inequities. For example, completion rates for American Indian/Alaska Native (AI/AN) students in NSHE institutions often remain below 30 percent, while the systemwide average across all student populations is closer to 45 percent. These indicators highlight the continuing need for targeted policy interventions.

Figure 1. Percent of Nevadans Below the Federal Poverty Level by Race/Ethnicity



FEDERAL POLICY CONTEXT

The broader federal policy landscape provides critical context for Nevada's efforts to address Native American education. The Morrill Acts of 1862 and 1890 created land-grant universities by transferring more than 11 million acres of Indigenous land across the United States to individual states, including over 81,000 acres in Nevada (Lee et al., 2020). Revenues from sales of these lands supported the establishment of the University of Nevada, Reno (UNR). The Dawes Act of 1887 further restructured Native landholdings by dividing communal reservation lands into individual allotments, a policy that ultimately reduced Native-held lands by over 90 million acres nationwide (National Park, 2021). The Dawes Act also introduced the concept of "blood quantum" as a legal measure for tribal membership, a mechanism that had significant implications that affected tribal citizenship requirements and sovereignty rights (Native Governance Center, 2025). The Indian Civilization Act of 1819 laid the groundwork for a federal boarding school system that removed Native children from their families to pursue assimilationist goals. Recent investigations have documented widespread mistreatment and deaths within these institutions (Newland, 2024).

Despite the profound disruptions caused by these policies, tribal nations continue to retain inherent sovereignty, a principle affirmed in the U.S. Constitution and in Supreme Court decisions such as *Worcester v. Georgia* (1832). Rights of tribal sovereignty are not race-based; they are an acknowledgment of the sovereign nations already present on the land that was later colonized.



More recent federal policies include the Indian Citizenship Act of 1924, which granted citizenship to American Indians born in the United States and the Indian Reorganization Act (IRA) of 1934. The IRA ended allotment policies and influenced how tribal governments are structured and self-govern. Congress sought to incentivize tribes to adopt constitutions and to comply with the IRA's provisions. It is reported that approximately 40 percent of the 574 federally recognized tribes that maintain government-to-government relationships with the United States operate under constitutions established under the IRA (Pevar, 2024). The impact of these federal policies extends to Nevada tribes and how they operate today.

NSHE INSTITUTIONS AND LAND-GRANT STATUS

Within this federal framework, the Nevada System of Higher Education plays a central role in the state's approach to educational access. Two research universities are included under the NSHE, along with one state university, one research institute, and four community colleges. Collectively, these institutions serve over 100,000 students and represent Nevada's most significant public investment in higher education (Nevada System of Higher Education, 2025). Founded in 1874 as Nevada's first land-grant university, UNR was financed in part through the transfer of 81,224 acres of expropriated Indigenous land, which generated an endowment of \$107,364 (Lee et al., 2020). The university has since grown into a comprehensive research university and continues to play a leading role in statewide initiatives. The University of Nevada, Las Vegas, initially an extension of UNR, became a separate institution in 1954 and was designated a land-grant institution in 2021 through [Senate Bill 287](#). With one of the most diverse student populations in the nation, UNLV has emerged as an important access point for underrepresented groups, including Native students. The Desert Research Institute (DRI), also granted land-grant status in 2021, focuses exclusively on environmental and atmospheric research and does not administer undergraduate or graduate degree programs. As a result, DRI is not a participating institution in the Native American Fee Waiver.

Other NSHE institutions play an equally important role in broadening access across the state. Nevada State University, founded in 2002 in Henderson, serves a large proportion of first-generation and underrepresented students and has been an active participant in the waiver program. Great Basin College, based in Elko with multiple rural centers, extends access to higher education across northern and rural Nevada, including areas adjacent to several tribal communities. Truckee Meadows Community College in Reno provides a key entry point to postsecondary education in the north, while the College of Southern Nevada (CSN), the largest higher education institution in the state, serves tens of thousands of students across three main campuses in the Las Vegas Valley. Western Nevada College (WNC), located in Carson City with additional centers in Fallon and Douglas County, provides access to students across western Nevada. Together, these institutions ensure the waiver is available not only at research universities but also across community colleges and state colleges, thus extending its reach to students pursuing certificates, associate degrees, and bachelor's degrees in addition to graduate study.



NATIVE AMERICAN FEE WAIVER LEGISLATIVE HISTORY

The legislative history of the waiver reflects a growing recognition of the higher education needs and challenges of Native students. In 2021, [Assembly Bill 262](#) established the Native American Fee Waiver across the NSHE institutions. Eligibility was defined to include members of, or descendants from, federally recognized tribes with historical or current ties to Nevada. Students are also required to demonstrate Nevada residency, complete the Free Application for Federal Student Aid (FAFSA), and maintain a 2.0 grade point average. The waiver covers mandatory fees not otherwise supported through federal financial aid or tribal education benefits. Policymakers have modeled aspects of the program on the state's existing Foster Youth Fee Waiver, signaling a broader interest in targeted financial aid programs designed to close equity gaps (The Nevada System of Higher Education, 2022).

[Assembly Bill 150](#), passed in 2023, further expands the waiver. It extends eligibility to students residing on federally recognized tribal lands outside Nevada while retaining other core requirements. The bill also clarifies the program's funding sources, directing both state General Fund allocations and federal American Rescue Plan Act (ARPA) dollars to reimburse institutions. Through April 2024, institutions were fully reimbursed for waived fees through the 2023-25 Biennium allocation from the State General Fund and one-time allocation of ARPA dollars; after that period, some campuses absorbed portions of the costs as forgone revenue as the fees waived exceeded the allocation from the State General Fund. Legislative testimony for both AB 262 and AB 150 reflected a collaborative process that involved state policymakers, NSHE representatives, tribal leaders, and student advocacy organizations.

Today, seven of the NSHE's eight institutions (UNR, UNLV, Nevada State University, Great Basin College, Truckee Meadows Community College, the College of Southern Nevada, and Western Nevada College) participate in the Native American Fee Waiver.



The program represents both an immediate policy achievement and an ongoing consideration for state lawmakers, the NSHE administrators, and tribal partners.

The Native American Fee Waiver holds policy significance in several respects. First, it addresses equity in access by reducing financial barriers for a student population that has historically experienced lower enrollment and completion rates. Second, the program reflects systemwide implementation, spanning institutions that range from research universities to community colleges. This broad reach differentiates Nevada's approach from states where similar programs are restricted to a single institution or sector. Third, the program raises questions of financial sustainability. While ARPA funds and state appropriations supported the initial years of implementation, long-term funding sources will be necessary to maintain the waiver without placing disproportionate burdens on institutional budgets. As such, the program represents both an immediate policy achievement and an ongoing consideration for state lawmakers, NSHE administrators, and tribal partners.



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NATIVE AMERICAN TUITION WAIVER PROGRAMS IN OTHER STATES

Several states and public universities across the United States administer tuition waiver or reduction programs for Native American students. While Nevada's Native American Fee Waiver is relatively recent (2021), comparable programs elsewhere have long histories, some dating back nearly a century. These policies vary significantly in their origins, eligibility rules, and scope of coverage, but together they illustrate a national landscape of approaches to improving affordability and access for Native students (see Figure 2).

Historic programs such as those at Fort Lewis College in Colorado, the University of Minnesota

Morris, and the University of Maine were established as conditions of federal land transfers or the closure of Indian boarding schools. These programs typically offer broad eligibility and cover tuition for undergraduate, graduate, and in some cases non-degree students. For example, Fort Lewis College has provided tuition-free education for Native students since 1911, while the University of Minnesota Morris has operated under state statute since 1909. The University of Maine System began tuition assistance in 1934 and now waives both tuition and mandatory fees.

Other statewide policies, such as Michigan’s Indian Tuition Waiver (1976), extend tuition coverage across all public community colleges and universities but may impose additional eligibility criteria, including blood quantum requirements or state residency. More recently, states such as Arizona, California, Oregon, and Utah have adopted programs structured as “last-dollar” awards. These initiatives, launched between 2022 and 2023, typically cover tuition and mandatory fees for degree-seeking undergraduates after federal and institutional grants are applied, but do not extend to broader costs of attendance such as housing, transportation, or books. Comparatively, “first-dollar” awards are applied to tuition bills first regardless of additional funding and can be used for other university related expenses.

Programs also differ in how they define eligibility. While some states (e.g., California, Arizona, Utah) limit eligibility to enrolled members of federally recognized tribes, others (e.g.,

Minnesota, Maine) extend assistance to direct descendants of tribal members (i.e. individuals who can prove Native American descendency but who may not be an enrolled member of their tribe). Residency requirements further shape access: Maine requires state residency for non-Maine tribal members, while Minnesota’s program is open regardless of residence. Figure 2 illustrates a brief comparative overview of a small sample of available programs and is not an exhaustive list.

Taken together, these examples highlight a national policy landscape marked by variation in scope and inclusivity. Longstanding programs reflect historic federal and state commitments, while recent expansions demonstrate a broader movement among public universities to reduce barriers for Native students. However, across nearly all models, tuition assistance does not eliminate the additional costs of attendance, leaving affordability challenges for many students.



Figure 2. Comparative Overview

STATE	PROGRAM / INSTITUTION	YEAR EST.	ELIGIBILITY	COVERAGE
Arizona	Univ. of Arizona – Native Scholars Grant	2022	Enrolled member of one of 22 federally recognized AZ tribes; first bachelor's degree; FAFSA required; Tribal enrollment documentation	Tuition + mandatory fees (last dollar)
	Northern Arizona Univ. – Access2Excellence	2023 (expanded)	Newly admitted AZ first-year or transfer student; AZ residents with an adjusted gross income ≤ \$65,000 or member of one of 22 AZ tribes (no income limit or residency requirement); Tribal ID or Certificate of Indian Blood required; Full-time enrollment	Tuition (last dollar)
California	UC Native American Opportunity Plan	2022	Enrolled member of a federally recognized tribe; CA residency; FAFSA/Dream Act; Tribal enrollment documentation	In-state tuition + student services fees (UG, Grad, Prof.)
Colorado	Fort Lewis College Native American Tuition Waiver	1911 (federal act)	Enrolled citizen or the children of an enrolled citizen of a U.S. federally recognized American Indian tribe or Alaska Native village; Tribal enrollment or descendency documentation (no residency requirement)	Full tuition (UG, Grad, Non-degree)
	Colorado American Indian Tribes In-State Tuition Act (SB 29)	2021	Members of one of the 48 tribes with historical ties to CO; Tribal enrollment documentation	In-state tuition classification
Idaho	Idaho State Univ. – Native American Tuition and Fee Program	2018	Member of a U.S. federally recognized tribe; degree-seeking; FAFSA; maintain satisfactory academic progress; Tribal enrollment documentation	Reduced tuition rate of \$60 per credit hour (UG, Grad)
Maine	Univ. of Maine – Native American Waiver and Education Program	1934	Enrolled tribal citizen or direct descendant (with documentation); state residency (for non-ME tribes); FAFSA	Full tuition + mandatory fees (UG, Grad)
Michigan	Michigan Indian Tuition Waiver	1976	MI resident, 1/4 or more Native American blood quantum, enrolled tribal citizen; Tribal enrollment documentation	Tuition (community colleges and public universities)
Minnesota	Univ. of Minnesota Morris – American Indian Tuition Waiver	1909 (state law)	Proof of membership or proof of descendency of a member of a federally recognized American Indian tribe, Alaskan Native Village, or Canadian First Nation; Tribal enrollment documentation	Full tuition (UG, Non-degree)
Oregon	Portland State Univ.– Native American Tuition Program	2022	Enrolled tribal citizen (U.S. federally recognized); Tribal enrollment documentation	In-state tuition (UG, Grad, Post-baccalaureate.)
Utah	The Univ. of Utah – Native Student Scholarship	2023	Enrolled member of one of the federally recognized tribes in UT; full-time degree-seeking undergrad; FAFSA; satisfactory academic progress; Tribal enrollment documentation	Tuition + mandatory fees (last dollar)
Nevada	The Native American Fee Waiver	2021 (expanded)	Proof of membership or proof of descendency of an enrolled member of a federally recognized Native American tribe or nation; Nevada resident; FAFSA; maintain 2.0 GPA	Registration + laboratory + other mandatory fees (first dollar); (UG, Grad, Non-degree, Prof.)

OBSERVED TRENDS IN FEE WAIVER MODELS



Historical Foundations: Programs at Fort Lewis College, University of Minnesota Morris and the University of Maine trace back nearly a century and are tied to land transfers or federal boarding school closures. These programs tend to provide the most comprehensive coverage.



Expansion in 2020s: Recent initiatives in Arizona, California, Oregon, and Utah reflect a growing recognition of Native student needs but are generally narrower in scope (last-dollar, undergraduates only, and state residency restrictions).



Eligibility Variation: Some states (e.g., Michigan) continue to use explicit blood quantum requirements, while others (e.g., Minnesota) recognize descendency beyond immediate parents. California and Arizona restrict eligibility to federally recognized tribal membership, while Maine includes descendants but requires extensive documentation.



Costs Not Covered: Across programs, tuition waivers rarely address the broader cost of attendance, leaving students responsible for housing, meals, transportation, and books.



Administrative Requirements: FAFSA submission and proof of tribal enrollment are common requirements. Several states mandate residency, though programs like University of Minnesota Morris explicitly do not.

METHODOLOGY

This Institutional Review Board-approved study employed a mixed-methods design integrating qualitative and quantitative approaches. The project was conducted in two phases, following preliminary work identifying the NSHE institutions eligible to provide the Native American Fee Waiver and relevant administrative stakeholders.

Phase I focused on qualitative interviews with administrators, students, and alumni to explore experiences, barriers, and recommendations related to the waiver. Phase II analyzed de-identified, aggregated institutional data, supplemented by publicly available information. Findings from both phases, together with a review of existing literature, informed policy recommendations.



Sampling and Recruitment

Seven NSHE institutions were eligible for inclusion:

- College of Southern Nevada
- **Great Basin College**
- **Nevada State University**
- **Truckee Meadows Community College**
- **University of Nevada, Las Vegas**
- **University of Nevada, Reno**
- Western Nevada College

Of these, the five institutions **bolded** above participated. Recruitment emails were sent to administrators at all seven institutions, inviting them to designate one representative directly involved in administering or processing the waiver. Students and alumni from the five participating institutions were also invited to participate.

Participants

Administrators

Inclusion criteria:

- Age 18 or older;
- Ability to read, speak, and understand English; and
- Direct involvement in administering or processing the Native American Fee Waiver at a participating institution.

Students and Alumni

Inclusion criteria:

- Age 18 or older;
- Member or descendant of a federally or state-recognized Indian Tribe or Nation;
- Ability to read, speak, and understand English; and
- Current or former student at a participating NSHE institution.

Student and alumni participants were not required to be active fee waiver recipients, ensuring perspectives included both users and non-users of the program, as well as those who lost eligibility.

Qualitative Data Collection

Interviews

Semi-structured interviews were conducted online with five administrators and 17 students/alumni. Administrator interviews (45–60 minutes) explored:

1. Institutional context;
2. Program utilization and awareness;
3. Barriers and challenges; and
4. Recommendations for improvement.

Student and alumni interviews (45–60 minutes) focused on:

1. Awareness and understanding of the waiver;
2. Application and enrollment experiences; and
3. Barriers and challenges.

All interviews were audio-recorded, transcribed, and followed by a seven-item demographic survey distributed through the online Qualtrics data collection survey platform.

Quantitative Data

Aggregated, de-identified data were obtained from participating institutions and supplemented with publicly accessible NSHE data. These data were used to examine program reach, enrollment patterns, and institutional variation in waiver utilization. Additional information was collected using an online Qualtrics demographics survey.



Data Analysis

Two researchers independently reviewed interview transcripts, summarized content, and identified preliminary categories. Results were compared, discrepancies discussed, and consensus reached on final themes through an iterative review. Quantitative data were descriptively analyzed to contextualize qualitative findings.

Ethical Considerations

This study was approved by the University of Nevada, Reno, Institutional Review Board (IRB# 2285176) on March 18, 2025. All participants provided informed consent. Participation was voluntary, and individuals could withdraw at any time. Data were de-identified prior to analysis to ensure confidentiality.

DATA STORY

OVERVIEW

The role data plays in our everyday lives is essential for making informed decisions. Leaders at all levels rely on the collection of accurate information to ensure the success of small and large-scale projects with the aim of improving specific dimensions of society. Although data is often thought to provide an unbiased picture of a particular issue, the data collection methods employed are not without limitations and may lead to erroneous conclusions and misguided actions. The consequences can be dire, ranging from the misallocation of limited resources to missing vital emerging issues. Data challenges are especially observed relating to American Indian/Alaska Native populations and their respective tribal governments.

A complex history exists between data collection procedures enacted by governmental entities and Tribal communities. To date, American Indian/Alaska Native communities remain the most undercounted group by the United States Census Bureau. In the Census Bureau's 2020 post-enumeration survey, which measures the accuracy of its reports, a net coverage error rate of 5.64 percent was reported—the highest error rate of any reported group. What appears to be a simple data gap may point to deeper systemic issues. According to a 2025 report conducted by Brookings Metro and the Southern California Association of Governments, several data challenges remain. These include:

- Small sample sizes for Native Americans;
- Remote geographical locations of Tribal reservations;
- Failure to recognize political identity, in addition to race and ethnicity;
- Data sets not reflecting Tribal interests; and
- Inaccessibility of certain data.

Many of these challenges remain unaddressed and extend to educational services and the data systems utilized, such as IPEDS.

More than 62,000 Urban Indians reside in Nevada (DNAA, n.d.). The state is home to what are commonly referred to as the Great Basin Tribes, comprised of 28 different Native communities, 20 of which are federally recognized. The Silver State is also home to many Indigenous groups from outside Nevada. Figure 3 on the following page shows the 20 largest Indigenous groups in Nevada, from the 2020 Census.



To date, American Indian/Alaska Native communities remain the most undercounted group by the United States Census Bureau. In the Census Bureau's 2020 post-enumeration survey, which measures the accuracy of its reports, a net coverage error rate of 5.64 percent was reported—the highest error rate of any reported group.



Figure 3. Nevada's Twenty Largest Indigenous Groups

INDIGENOUS GROUP	NEVADA POPULATION
Cherokee	12,395
Aztec	9,807
Navajo Nation	4,282
Maya	3,612
Blackfeet Tribe of the Blackfeet Indian Reservation of Montana	3,388
Choctaw	2,541
Paiute	2,531
Shoshone	2,328
Apache	2,275
Sioux	1,511
Pyramid Lake Paiute Tribe of the Pyramid Lake Reservation, Nevada	1,478
Washoe Tribe of Nevada and California	1,240
Chippewa	1,030
Walker River Paiute Tribe of the Walker River Reservation, Nevada	941
Te-Moak Tribes of Western Shoshone Indians of Nevada	910
Shoshone Paiute	791
The Chickasaw Nation	741
Reno-Sparks Indian Colony, Nevada	737
Yaqui	708
The Muscogee (Creek) Nation	685

To meet annual reporting requirements, the NSHE collects data on the number of fee waiver recipients by institution. The reported numbers during the 2024-2025 enrollment period for each institution can be found in Figure 5, in addition to the total student enrollment and AI/AN student enrollment. Figure 6 illustrates AI/AN graduation rates across all NSHE institutions. However, it is important to note the following limitations and nuances of these data sets:

- AI/AN student enrollment will not capture all AI/AN students as some are categorized as “two or more races” when more than one race is selected. For example, if a student selects both Hispanic and AI/AN ethnicity checkboxes, then the IPEDS data will categorize the student as “two or more races” and not include that student in the AI/AN count. Therefore, the AI/AN student count is likely much lower than reality.
- The self-identified categorization does not result in automatic fee waiver enrollment as eligibility requirements must still be met; and

- Graduation rates are calculated such that only students who meet certain requirements are included.
 - It should be noted that IPEDS defines the graduation rate as, “the percentage of students entering the institutions as undergraduate, full-time, degree-seeking in a fall cohort year who complete their program within 150 percent of normal time (6 years for bachelors degrees, 3 years for associate degrees, 1.5 years or one and a half times the normal period of time for certificates). This rate is calculated as the total number of completers within 150 percent of normal time divided by the fall cohort.”
 - Additionally, the calculation of graduation rates is restricted to the specified criteria and misses those who take longer to graduate. It would be beneficial to know the graduation rates of fee waiver recipients, but that data is currently unavailable.

An institutional recommendation may be to include categories of graduation rates that account for the students who graduate outside of their cohort or the allotted time.

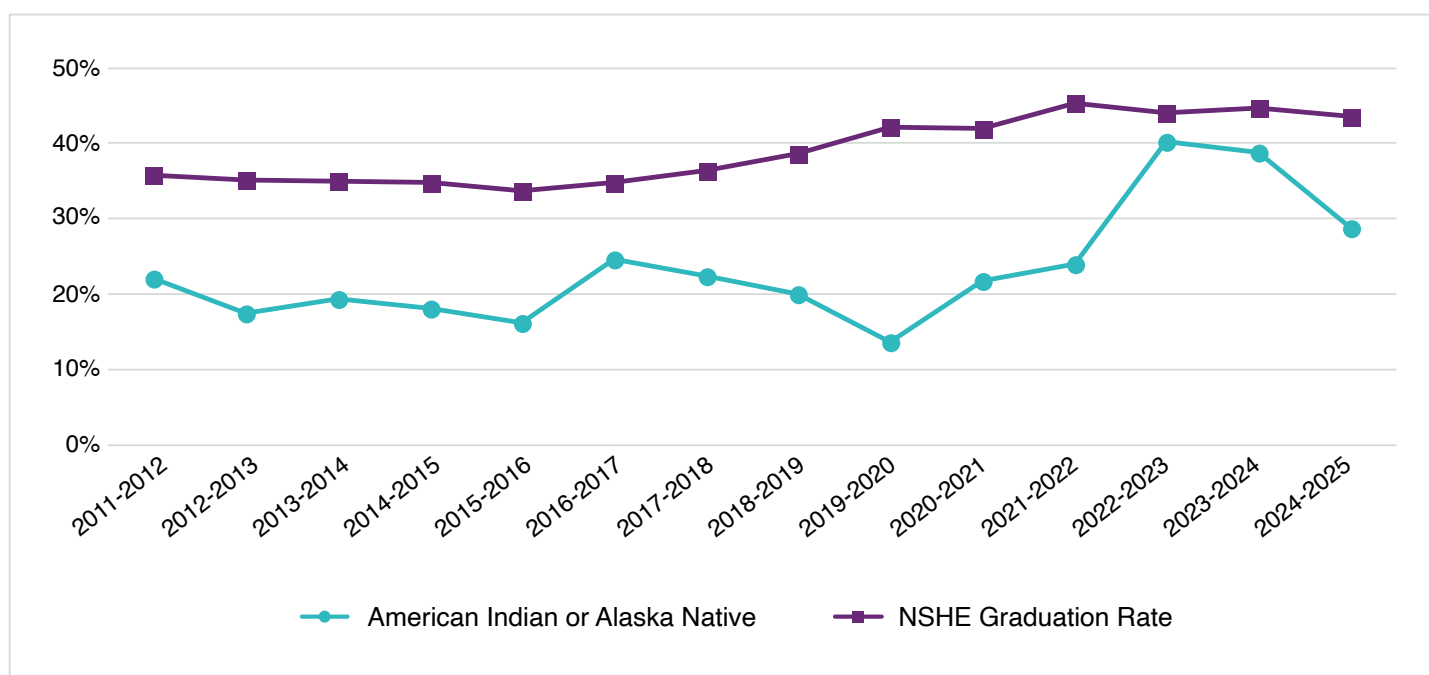


Figure 5. NSHE Student Enrollment for the 2024-2025 Academic Year

INSTITUTION	TOTAL STUDENT ENROLLMENT	AI/AN STUDENT ENROLLMENT	FEE WAIVER ENROLLMENT
UNLV	32,911	104	104
UNR	23,024	166	261
NSU	7,549	18	13
CSN	28,313	80	37
GBC	3,320	77	73
TMCC	10,885	125	158
WNC	4,284	71	62
Total NSHE	110,286	641*	708

**As noted on page 19, those AI/AN students who select a second ethnicity when they enroll are not included in the student enrollment count here. Thus, the total "Fee Waiver Enrollment" is greater than the total "AI/AN Student Enrollment"*

Figure 6. AI/AN Graduation Rates Across All NSHE Institutions



As previously noted, there are large gaps in available data at both state and institutional levels. The results of this study align with the reported ambiguity that accompanies such limited data and how NSHE institutions are impacted. One key message expressed by institutions is their desire for more guidance on what information they should track and how it should be used. This will be discussed in more detail below.

INTERVIEW THEMES

We interviewed the five participating institutions and requested de-identified aggregate data from each. We received data from UNR and NSU. Although the data we collected comes with its own limitations (e.g., small participant number), we include it here to inform institutions of the data currently being collected, which varies across institutions. For example, UNR collects data on student tribal affiliations, further categorizing them into Nevada and non-Nevada tribes. Both UNR and NSU also track student majors. Participant gender and ethnicity are also shown in Figure 7 and Figure 8.

Figure 7. Gender of Participants

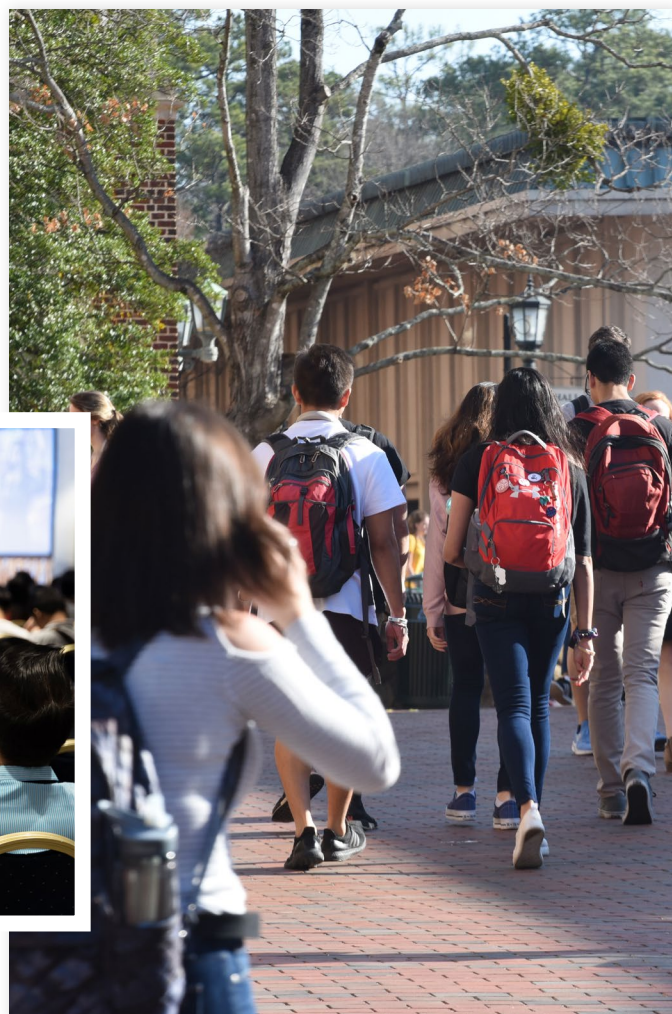
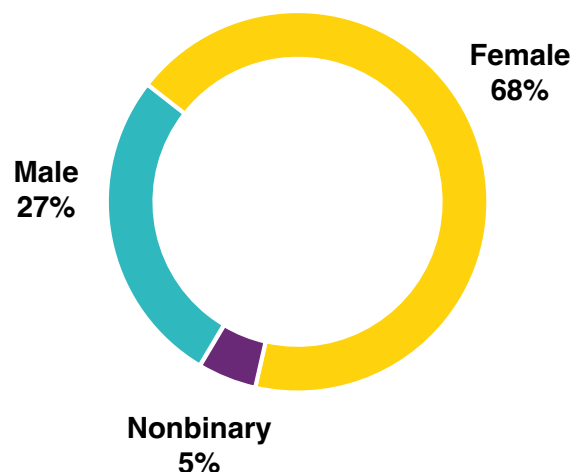
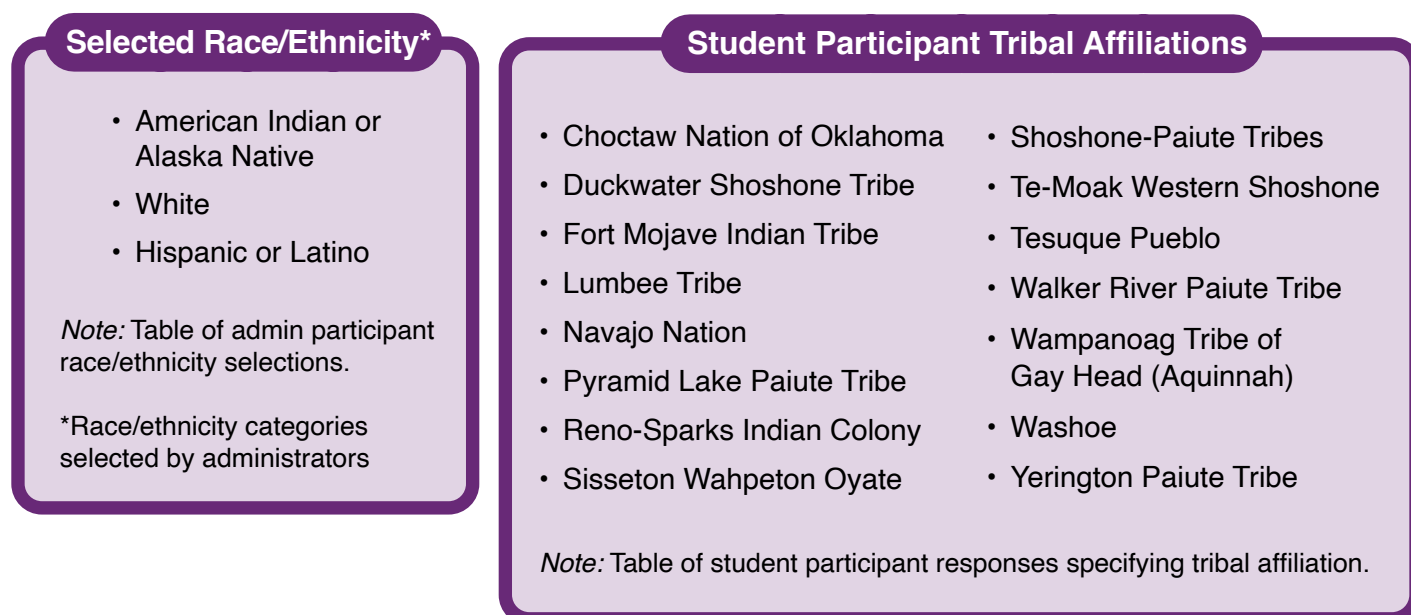


Figure 8. Student and Administrator Participant Data Collected



Prior to discussing some of the barriers and limitations to implementation, we want to acknowledge the significant benefit the fee waiver program has provided to students. Many students expressed how it has positively impacted their lives and ability to attend college. One student stated: *“There is absolutely no doubt in my mind, the fee waiver has changed my life. I have large amounts of undergraduate student loan debt. My parents were not able to contribute to my tuition or cost of living expenses as an undergraduate or now as a graduate student. The fee waiver has lifted some of the weight off my shoulders.”*

Another student also shared how they have benefited: *“It made a huge impact. I feel it helped me to stay motivated, and it relieved me of any stress for the out of pocket costs I had to pay that grants/scholarships did not cover.”*

The fee waiver has also helped to improve college accessibility: *“It made attending college much more accessible. Because I am, you know, a low-income family student, one of my biggest worries was how*

I was going to afford college. While I did receive a lot of other scholarships, it definitely took a weight off my mind, at least my tuition, classes, and fees would be covered.”

Another student similarly stated: *“I wouldn’t be in my program now if it wasn’t there...and it motivated me to get to this next part, where now I’m halfway through.”*

Another individual reported: *“If I didn’t qualify for this...I would not have come back to school. This tuition waiver really allowed me to come back to school...without it, I wouldn’t be back at [institution].”*

The fee waiver has also helped students from incurring additional debt: *“...having the tuition waiver is really great. I couldn’t afford to pay out of pocket for school if I didn’t want to take out student loans. So the tuition waiver is super helpful in that regard...I mean, this far exceeds anything else I’ve used, including scholarships for my undergrad, because I was never fully funded...this program’s amazing.”*

THEME 1: INSTITUTIONAL INFRASTRUCTURE AND PROCESSING COMPLEXITY

Both students and administrators emphasized the complexity of navigating and processing the Native American Fee Waiver, pointing to overlapping departmental responsibilities, limited staff awareness, and technical barriers. Institutions have developed varied infrastructure to support the waiver, often shaped by their size, staffing, and proximity to tribal communities. Larger universities, like UNR, have established centralized supports, such as the Office of Indigenous Relations, while others, like UNLV, embedded responsibilities in financial aid, admissions, or recruitment. Smaller colleges such as NSU, GBC, and TMCC reported fewer processing delays due to lower enrollment, though staff often managed the process informally: *“I notify the cashier’s office by email to apply it, and they usually apply it within that day... because we’re kind of a small college.”*

For students, this variation often translated into confusion about who to contact. *“All the universities were grappling with how to administer this, so each did it differently,” one recalled.* Another described, *“I eventually got my hands on the form, but I had no idea who to turn it into.”* Staff turnover and the absence of clearly designated contacts compounded this issue: *“With so many different departments, you can get different answers about the same question.”*

Administrators acknowledged these challenges, noting that processing the waiver typically requires coordination across multiple offices. As one put it, *“It takes three separate offices to review and process the waiver.”* Another added, *“It wasn’t as easy as I thought—it’s not just fill out the form and you’re good to go.”* To manage this, some institutions created internal workflows or centralized inboxes, while UNLV integrated its waiver process as an add-on to their admissions system. Yet reliance on systems like PeopleSoft remain labor-intensive: *“We could do it...but it’s a manual system. It becomes very laborious.”*



“Sometimes you’re going to your classes still wondering, am I a student? Did they get paid?”

The Free Application for Federal Student Aid requirement emerged as a recurring challenge for both students and staff. Administrators explained that FAFSA completion, while technically separate from waiver eligibility, often delayed processing: *“The simple form was not so simple, apparently...I had to keep waiting and waiting to get confirmation.”* Students described anxiously monitoring accounts, uncertain whether fees had been paid: *“Sometimes you’re going to your classes still wondering, am I a student? Did they get paid?”*

Verifying tribal enrollment or descendency is another area of complexity. Staff with Native backgrounds or liaison roles often provided critical guidance, offering training on interpreting tribal documents: *“They did have insight into what tribal IDs look like... and did provide training on that context.”* Students, however, noted the burden of repeatedly proving identity: *“We have to have everything—family trees, enrollment cards—because that’s the life of living on a reservation. You’re constantly asked to prove who you are.”*

Ultimately, both groups emphasized that successful navigation of the waiver often depended on personal connections to knowledgeable staff. As one student summarized, *“The biggest support is knowing folks on campus who know the system and the fee waiver.”* Without such guidance, students faced prolonged delays, bureaucratic runarounds, and heightened stress, while administrators continued to wrestle with system limitations and fragmented processes.

THEME 2: OUTREACH, IDENTIFICATION, AND ENGAGEMENT ACROSS SYSTEMS

Students reported learning about the Native American Fee Waiver most often through family members, peers, or tribal offices rather than directly from universities. One student recalled, *“all my information came from my tribal office since I wasn’t yet connected to [my institution].”* Another emphasized the role of peers and community ties: *“It came through folks I knew.”* For many, tribal liaisons and advocates at both the high school and college level were critical for connecting to the waiver and receiving guidance through unfamiliar institutional processes. As one student noted, *“I received guidance from the Native advocate at [my institution]—she is the one who informed me of the change in requirements for the waiver.”*

Universities confirmed that outreach is uneven and highly dependent on available systems and staff. At the K–12 level, districts rely on federal Form 506 to identify Native students, but completion rates vary widely and limit consistent outreach. One administrator explained, *“I think we need to make sure all school counselors are aware of the process, especially for students taking dual credit classes. If they’re not told, how are they even applying?”* Students echoed this concern: *“When I first applied as a dual credit student, it took a lot of communication between my counselor, my high school, and [my institution] to figure out what fees were being covered.”*

At the postsecondary level, outreach strategies differ by institution. For example, UNLV has integrated Native identity questions into its admissions application; once students select their tribe, *“it triggers a communication that is sent to them.”* Meanwhile, UNR relies on federal reporting data collected after enrollment, which can sometimes delay contact. Smaller institutions such as TMCC

and GBC lack sophisticated systems altogether, instead relying on direct outreach through school visits, community events, and tribal partnerships.

Students described this inconsistency firsthand. Some learned through campus flyers, faculty, or targeted emails, while others said, *“I feel like, had I not known about it, I don’t know that I would have known to ask.”* One explained, *“There wasn’t any info provided in the application process. I had to do all of that myself.”* Another urged more proactive outreach: *“When you apply and check the race or ethnicity box, someone should follow up and say, ‘Hey, you could qualify for this.’”*



“There wasn’t any info provided in the application process. I had to do all of that myself.”

Tracking and engagement after enrollment is also limited. Institutions reported challenges monitoring waiver recipients and providing follow-up support, often relying on manual systems. As one administrator acknowledged, *“Students enroll in the fee waiver, utilize it, and then there’s no check-in, no help for them on campus. Sometimes that’s enough, but sometimes it’s not.”*

Together, these perspectives highlight that while tribal networks and advocates are vital entry points for many students, institutional outreach remains fragmented and uneven. Success often depends on chance encounters with supportive staff or community leaders, leaving gaps for students without strong tribal connections or those from out-of-state tribes.

THEME 3: CULTURAL UNDERSTANDING AND ROLE FLUIDITY

Students consistently emphasized the importance of being supported by individuals they trust; people who not only understand institutional processes but also their cultural context and shared values. Trust, family, community, and representation emerged as core themes. As one student put it, *“In the Native American community, everybody knows everything... building trust is important.”*

Many described the difference it made when working with coordinators or liaisons who understood their lived experiences. One student explained that while financial aid staff often lacked detailed knowledge, *“the coordinators have been the most beneficial... as long as there’s somebody that the students know they can reach out to.”* Without this cultural grounding, students reported feeling isolated, misunderstood, or dismissed.



“It would be nice if people understood more of the history of why Native people would be getting this... there’s a whole history of why this is even on the table.”

Some students reflected on misconceptions about the waiver itself, such as outsiders framing it as a “free handout.” As one participant stressed, *“It would be nice if people understood more of the history of why Native people would be getting this... there’s a whole history of why this is even on the table.”*

The absence of cultural representation on campus was described as a major factor in student attrition. A former Native resident assistant shared, *“I had one of my students drop out and go back home... even though there were 11 or 12 other Indigenous students. They still chose to drop out because they*

wanted to be closer to their culture, their family, their friends.”

Others highlighted that without visible Native leadership or community, students often feel disconnected and unsupported: *“If your culture isn’t represented, you’re more likely to drop out and go back home.”*

Students also described experiences of cultural insensitivity in the classroom, ranging from being told they “don’t look Native enough” to being mislabeled by instructors. One student recalled, *“I have an instructor right now, and he’s calling me Indian. I’m like, no, I’m Native... it was pretty disappointing to have to have that conversation in this day and age.”*

Administrators echoed these challenges, noting that trust-building with Native communities can take years, and that institutions often lack staff with the cultural competence to provide consistent support. One staff member explained, *“I process student loans and I’m also the Native American liaison... I can take them by the hand and kind of guide them through the whole process.”* This kind of role fluidity, where staff take on multiple responsibilities to support Native students, was seen as both necessary and precarious. As another administrator reflected, *“I’m not an advisor, but I’m happy to talk to you... I want to help students regain eligibility, but my boss says, nope, that’s not your role.”*

Ultimately, students and staff alike stressed that institutional support must extend beyond financial aid to include culturally responsive advising, peer networks, and visible Native leadership. As one participant put it, *“The boat is being missed when it comes to just going back to what really matters, which is community.”*

THEME 4: NAVIGATING STUDENT FUNDING ACCESS AND ADMINISTRATIVE COMPLEXITIES

While the fee waiver eases tuition costs, both students and administrators emphasized that it only addresses part of the financial picture. Students still shoulder substantial living expenses: housing, food, transportation, books, and program-specific costs, which often exceed what federal, state, or tribal aid can cover. As one administrator explained, *“Just because your classes and your fees are paid for doesn’t necessarily mean it’s free... there are still costs that could potentially create barriers for our students.”*

For many, the waiver provided a life-changing foundation that made higher education feel possible. One student reflected, *“It was, like, the first semester where I didn’t really have to worry about paying for my tuition, and I could just focus on buying all my books and working my jobs to pay my bills.”* Another described how the program shifted long-term aspirations: *“As soon as somebody explained to me that the Native American Fee Waiver can pay for my med school, I was like—you mean this is actually realistic now? This isn’t just a dream?”* Others echoed how it enabled persistence: *“This tuition waiver really allowed me to come back to school... without it, I wouldn’t be back at [my institution].”*

Yet the broader funding landscape remains complex. Students often layer Pell Grants, tribal scholarships, institutional awards, and private support, but confusion around how these interact with the waiver can lead to unintended consequences. One student described, *“Every time a scholarship hit my account, they tried to take that on top of the waiver. So, it was always a fight to go get my money back.”* Another shared frustration that the waiver was coded as a scholarship, which then displaced other aid: *“It felt like I had successfully gotten them, and then gotten the fee waiver, and they took all my scholarships*

away from me... that was my money for books, bills, maybe even a car.”

Tribal funding is often limited and unreliable, leaving students with gaps to cover. One participant explained, *“Tribal funding is always tight and very slow... many times tuition was owed and the tribal check had yet to arrive to the university. It puts a lot of stress on tribes and it’s unfair to students that want to go to school, but there isn’t enough funding.”* Others noted tribal assistance often ends at the bachelor’s level: *“My tribal assistance only covered me through my bachelor’s. Once I achieved that, it was cut off. And it’s like, what if I want to do more?”*

As a result, most students continue to juggle work alongside their studies. *“I’ve always had a part-time job in addition to my full-time job,”* one explained. *“Since the fee waiver only covers tuition, there’s still the cost of books, a new laptop, subscriptions... and now I’m working less hours because of school.”* Others linked these financial strains directly to retention: *“Some students don’t have the opportunity to go, even though there’s this free education. If you can’t afford to live in the dorms or an apartment, then you just can’t go to school. That’s still a really big factor in the dropout rate for Native students.”*

Overall, while the fee waiver alleviates a significant portion of educational expenses, students must still navigate a complicated funding terrain marked by bureaucratic inconsistencies, overlapping aid rules, and the limits of tribal support. The waiver is consistently described as a “lifeline,” but its full impact depends on clearer coordination across institutions, tribal governments, and financial aid systems to ensure it complements, rather than displaces, other resources.

THEME 5: NEVADA POLITICS AND STUDENT IMPACT

Students were deeply aware of the political context surrounding the fee waiver and described a persistent sense of uncertainty about its future. This uncertainty shaped how they approached their education—at times with urgency, at times with hesitation.

For many, the shifting legislative discussions created a “use it or lose it” mentality. As one student shared, *“My thought was that I have to get on this quick, because it’s gonna be taken away, there’s gonna be changes... and if we start to prosper in a program, they’ll say we don’t need it anymore, and then all funds are cut.”* Another echoed the pressure to act quickly: *“There is a friction there, and without the pressure on the fee waiver to be taken away, I think I might not have enrolled in classes.”*

Others described the opposite reaction—choosing not to use the waiver out of fear that they might be taking resources away from someone else. One explained, *“I felt that maybe I would have been taking away from somebody else’s opportunity if I did join.”* Another admitted feeling guilty: *“I do feel bad... I always had financial aid, so in that respect I’m like, is this any better use on other people?”*



“With this change they were proposing... it was very, very scary. It would have left me without funding to finish my program.”

Students also described the emotional toll of legislative uncertainty. Proposals to limit the waiver to certain groups, such as graduate students, or to restructure the funding mechanism, created fear about program completion. One student recalled,

“With this change they were proposing... it was very, very scary. It would have left me without funding to finish my program.” Another noted, *“Getting a master’s degree or PhD is already difficult enough without having those concerns.”*

This political climate not only created stress but also influenced enrollment decisions. A student from outside Nevada described how rumors of change spurred action: *“I thought, well, darn, my window’s closing. So, I started to feel some urgency.”* Similarly, students who advocated for the bill or followed legislative hearings saw firsthand how political tactics fueled anxiety, *“Usually things don’t go too good for too long, so the skepticism was always there—okay, when are they gonna take this away?”*



“Having [my institution] reach out to people in advance to let students know about any possible changes the legislature is trying to make; that would help us prepare.”

Students consistently expressed the need for clearer, proactive communication from universities and tribal leadership. As one put it, *“Having [my institution] reach out to people in advance to let students know about any possible changes the legislature is trying to make; that would help us prepare.”* Without that, many described feeling caught between fear of missing out and fear of overusing limited resources, a dilemma that underscored both the personal and political stakes of the waiver.

KEY POLICY CONSIDERATIONS

Based on findings from this study, as well as existing literature (Greyeyes et al., 2023; Minthorn and Youngbull, 2023; National Native Scholarship Providers, 2022; Tachine et al., 2021) and stakeholder input, the following policy recommendations are proposed to strengthen the implementation and impact of the Native American Fee Waiver across the Nevada System of Higher Education.

1. Establish Dedicated Fee Waiver Offices or Roles

Create designated staff positions or offices at each NSHE institution to support students throughout the fee waiver process, from application to ongoing eligibility. A dedicated point of contact could reduce confusion, streamline communication, and provide culturally responsive support.

2. Increase Staff Training

Provide regular, systemwide training for staff on the fee waiver process, including cultural competency and tribal history in Nevada. Mandatory training for financial aid, admissions, and advising personnel can help ensure accurate and consistent guidance to students.



3. Strengthen Tribal Relationships

Formalize consultation processes with Nevada's federally recognized tribes and tribal organizations. Consider establishing advisory councils or regular meetings that include tribal leaders, university administrators, and Native student representatives to improve trust, collaboration, and transparency. To aid in these endeavors, NSHE could: (1) designate a central system-wide point of contact; (2) make that person available for systems-level questions, suggestions, and consultation; (3) annually send each Nevada tribe an update on the program with the latest contacts, forms, links, et cetera; (4) annually send a feedback survey to all participating institutions and students; and (5) share the results with participating community stakeholders.

4. Automate Identification Systems to Streamline Eligibility

Incorporate automated systems within admissions and enrollment processes to flag potentially eligible students early, ensuring they receive timely information about the waiver before and during application. Relatedly, fee waiver eligibility could be granted partially contingent on FAFSA confirmation to help further streamline eligibility.

5. Increase Post-enrollment Engagement

Implement proactive check-ins with students who use the waiver to monitor progress and provide resources for maintaining eligibility. Pair fee waiver access with academic supports such as tutoring, mentoring, and access to Native student centers.

6. Provide State Funding

Secure dedicated state funding to support the fee waiver across all NSHE institutions, including for non-credit and continuing education programs. A stable funding model could address concerns expressed by both students and institutions about the long-term viability of the waiver. If the fee waiver program is reduced or eliminated, fee-waiver students should be guaranteed coverage through the completion of their current degree to help eliminate uncertainty related to utilizing the fee waiver.

7. Create Clear Policies

Ensure consistent interpretation and application of waiver policies across the NSHE institutions, particularly regarding continuing education, professional certificate programs, and graduate study. Clear and accessible guidelines should be available to both staff and students. It may be beneficial for some of these activities to be centralized at the NSHE.

8. Expand Scholarship Caps

Revise policies to prevent the fee waiver from interfering with a student's eligibility for other scholarships, stipends, or awards. Expanding scholarship caps could allow eligible students to receive additional financial support beyond the fee waiver.



9. Maintain a “First-dollar” Structure

Retain the waiver as a first-dollar award, applied before other scholarships or aid. This ensures that Native students continue to benefit from additional forms of financial support without displacement of the waiver.

10. Standardize Data Collection

Develop systemwide standards for data collection on fee waiver utilization, including enrollment, retention, and graduation outcomes for Native students. Require annual public reporting from each institution to increase accountability and inform future policy decisions.



CONCLUSION

In 2021, the Nevada System of Higher Education implemented the Native American Fee Waiver as one of several tuition support programs available to eligible student populations. The number of recipients has grown since its inception from 140 during the Academic Year 2021-22 to 708 for the most recent Academic year 2024-25. This growth, in addition to student testimonials about how the fee waiver is improving their lives, shows the success of the fee waiver program. This report examines the experiences of students applying for and utilizing the fee waiver across the NSHE institutions to identify and address barriers, including opportunities for improving the process. Our research reveals several options to enhance the fee waiver program and the experiences of both students and administrators. Our key findings include unnecessary complexity in processing the fee waiver, inconsistent institutional support, cultural competency gaps, and inconsistent outreach methods. Furthermore, stakeholders noted the need for additional income or financial aid to cover the non-tuition costs related to attending college. Addressing these concerns may contribute to the continued success of the fee waiver program for current and future students.

Policy considerations include a need for universities to create dedicated offices or roles to help students navigate the fee waiver process to lessen delays and frustrations. This also relates to increasing staff training and further automating processes during the application process when first enrolling at a university to aid in identifying eligible students. Providing clear policies about how to apply the fee waiver to continuing education credits could eliminate additional barriers to utilization. Increasing post-enrollment engagement activities

(i.e., checking in with students) will be important for helping students maintain fee waiver eligibility. It is also important for fee waiver information to be disseminated to tribal communities, which will likely help strengthen their trust and overall relationship with universities.

Additionally, ensuring that the fee waiver maintains a “first-dollar” structure is pivotal for students to receive adequate financial support needed for living and other university related costs not covered by the fee waiver. Expanding scholarship caps to minimize the fee waiver interfering with receiving other awards can help address this issue. Dedicated State General Fund appropriations would also address concerns of limited availability of funds and is important for supporting non-credit courses. Finally, standardizing data collection processes, including the sorts of data that should be collected, will likely help to provide a clearer picture of program outcomes across the NSHE institutions in the state.



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APPENDIX A: GLOSSARY

Allotment: Under the General Allotment Act or Dawes Act of 1887, communal tribal lands were divided into separate parcels to be sold to individual tribal members, whereby nonallotted land could be sold to non-Native settlers. <https://www.archives.gov/milestone-documents/dawes-act>

Blood Quantum: A concept designed by White settlers to refer to the amount of “Indian blood” that someone is determined to possess by dividing an individual’s parents’ combined degree of “Indian blood” in half. <https://nativegov.org/resources/blood-quantum-and-sovereignty-a-guide/>

First-Dollar Program: Program dollars are applied to university tuition bills first, followed by the application of federal or state financial aid. <https://getschooled.com/article/6005-how-college-promise-programs-work/>

Indian Boarding School: Institutions developed under federal policies to allow Native American children to be forcibly removed from their homes for purposes of assimilation and cultural genocide. <https://boardingschoolhealing.org/us-indian-boarding-school-history/>

Institutional Review Board (IRB): A federally mandated committee responsible for protecting the rights and welfare of human research participants. <https://www.unr.edu/research-integrity/program-areas/human-research/researchers>

Integrated Postsecondary Education Data System (IPEDS): A system that conducts annual surveys from colleges, universities, and technical and vocational institutions that participate in federal student financial aid programs. <https://nces.ed.gov/ipeds>

Land Grant Status: A designation for colleges and universities receiving benefits under the Morrill Acts in 1862 and 1890. <https://www.congress.gov/crs-product/R45897#fn5>

Last-Dollar Program: Program dollars are applied to university tuition bills last, after the application of federal or state financial aid. <https://getschooled.com/article/6005-how-college-promise-programs-work/>

Scholarship Cap: A limit to how much financial aid a student can receive with respect to additional factors such as an institution’s cost of attendance. <https://studentaid.gov/help-center/answers/article/how-does-scholarship-affect-student-aid>



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