

Experimental Sites Initiative Second Chance Pell

**Evaluation Report for Award Years
2016-2017 and 2017-2018**

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Table of Contents

Background on the Experimental Sites Initiative	3
Second Chance Pell Experiment	4
Implementation by Federal Student Aid	5
Application and Screening Timeline and Process.....	5
Program Participation Agreement Amendment Procedures.....	6
FSA System Updates	6
FSA Evaluation	6
Formative Assessment.....	8
School Participation.....	8
Region	14
Locale	16
Type of School	17
Enrollment	19
Tuition.....	21
School Implementation	22
School Survey Results	22
Challenges Schools Encountered.....	22
Unanticipated Benefits	26
Restrictions on Student Participation.....	28
Unintended Negative Consequences	30
Staff Roles	32
Tuition Charged	33

Second Chance Pell Experiment

Student-Level Data	35
FSA Systems / COD / Upload Process	35
Student Participants	35
Characteristics of Student Participants	39
Measures of Experimental “Outcomes”	43
Average Credit Completion	43
Results Not Yet Observed	50
Preliminary Implications	51
Next Steps	53
Experiment Moving Forward	53
2018-2019 and Beyond	53
Conclusion	53
Summary	53
Implications for the Experiment	54
Appendix A – Second Chance Pell experiment Program Participation Agreement (PPA) Amendment	55

Background on the Experimental Sites Initiative

Under section 487A(b) of the Higher Education Act of 1965 (HEA), as amended, Congress authorized the Experimental Sites Initiative (ESI). This initiative – or "experiments," as they are frequently called – tests the effectiveness of statutory and regulatory changes by providing limited flexibilities to postsecondary institutions participating in an experiment in administering and disbursing Title IV student financial aid. By analyzing the results achieved with the experimental waivers in place, the U.S. Department of Education (Department) has information to evaluate potential outcomes of proposed changes to current statute and regulation that govern Title IV student aid programs. The experiments authorized through ESI potentially benefit all postsecondary institutions and the students they serve by providing information to law and policy makers' that supports informed decisions concerning the elimination, continuation, or modification of current statute and regulations governing Title IV aid programs and delivery.

As of the date of publication the current experiments under the ESI are (in alphabetical order):

- [Competency-Based Education \(CBE\)](#)
 - [Split Disbursement](#)
 - [Satisfactory Academic Progress \(SAP\)](#)
 - [Subscription Period Disbursement](#)
- [Direct Loan Program - Limiting Unsubsidized Loan Amounts](#)
- [Dual Enrollment](#)
- [Educational Quality through Innovative Partnerships \(EQUIP\)](#)
- [Federal Work Study \(FWS\) - Near-Peer Counseling](#)
- [Limited Direct Assessment](#)
- [Loan Counseling](#)
- [Prior Learning Assessment](#)
- [Second Chance Pell](#)

Second Chance Pell Experiment

On April 15, 2003, the U.S. Department of Justice, Bureau of Justice Statistics published a “Special Report” that concluded the prison population in the United States of America is significantly less educated than the general population. For nearly half of all incarcerated individuals in Federal or State facilities, a high school diploma or General Educational Development (GED) certificate is their highest level of education. Only 11 percent of incarcerated individuals in State correctional facilities and 24 percent of individuals incarcerated in Federal prisons have completed at least some postsecondary education, compared to about 48% of the general population.¹ In addition, educational offerings at Federal and State correctional institutions are limited in that they generally focus on adult basic education and secondary education that aim to improve foundational reading, writing, numeracy, and English language skills. Surveys of Federal and State prisons have found that only about 40 percent offer postsecondary education programs.²

Section 401(b)(6) of the HEA prevents students who are incarcerated in a Federal or State penal institution from receiving Federal Pell Grant funds. This prohibition is included in the Department of Education's regulations at [34 CFR 668.32\(c\)\(2\)\(ii\)](#). Through the ESI, the Second Chance Pell experiment waives this prohibition by allowing participating postsecondary institutions to provide Federal Pell Grant funding to otherwise eligible students enrolled as regular students in an eligible Title IV program while they are incarcerated in Federal or State penal institutions. These students were also required to be eligible for release into the community, with a priority given to those individuals likely to be released within five years of beginning participation in the Second Chance Pell experiment. All other provisions and regulations of the Title IV, HEA programs still apply to institutions and students participating in this experiment.

This report presents information on the Second Chance Pell experiment through the first and second year of the experiment, which were the 2016-2017 and 2017-2018 award years. The Second Chance Pell experiment was announced in a Federal Register notice that was published on August 3, 2015.

The objectives stated in the Federal Register Notice for the Second Chance Pell experiment are to:

- Learn how Federal Pell Grant funding can expand postsecondary educational opportunities for incarcerated individuals,
- Explore how awarding Pell Grant funding to incarcerated students expands access to higher education and fosters other positive outcomes, and

¹ Caroline Wolf Harlow. “Education and Correctional Populations.” U.S. Department of Justice, Office of Justice Programs. January 2003. Accessed on June 12, 2015 at: www.bjs.gov/content/pub/pdf/ecp.pdf.

² Wendy Erisman and Jeanne Bayer Contardo. “Learning to Reduce Recidivism: A 50-state Analysis of Postsecondary Correctional Education Policy.” Institute for Higher Education Policy. November 2005. Accessed on June 12, 2015 at: www.ihep.org/sites/default/files/uploads/docs/pubs/learningreducerecidivism.pdf.

- Provide the Department of Education with information regarding the types of postsecondary schools that would be interested in providing postsecondary instruction, and the characteristics of prisoners who would likely pursue higher education if the statutory and regulatory prohibition for awarding Pell Grant funds to individuals incarcerated in Federal or State penal institutions were modified or rescinded.

Consistent with the waiver authority granted to the Secretary under section 487A(b) of the HEA, the Department of Education is using this experiment to examine the extent to which waiving the prohibition on providing Federal Pell Grants to students incarcerated in Federal or State penal institutions affects their postsecondary enrollment, progression toward a degree or credential, as well as other positive educational and broader life outcomes after incarceration.

Implementation by Federal Student Aid

The Department of Education began this set of experiments after the Federal Student Aid (FSA) office solicited ideas from postsecondary stakeholders for experiments that would assist law and policy makers in determining ways to improve the delivery of Federal Title IV aid programs. From these ideas, the Department of Education formulated experiments to allow a trial run of the proposed changes to the rules governing the delivery of Federal Title IV student aid. After these experiments were formulated, the Department identified the specific statutory and regulatory requirements associated with each of the experiments that would need to be waived for the experiments to proceed and then invited postsecondary institutions to apply for participation in one or more of the proposed experiments. FSA also updated its internal systems to accommodate the experiments and the relevant, temporary waivers to “normal” policies and procedures.

Application and Screening Timeline and Process

- FSA published a notice in the August 3, 2015 [Federal Register](#) inviting postsecondary institutions to participate in the Second Chance Pell experiment
- Postsecondary institutions submitted letters of interest to FSA expressing interest in participating in the experiment
- FSA reviewed the letters of interest from the postsecondary institutions as well as each applicant institution’s recent history of administration of Title IV funds, evaluating compliance with current regulations
- FSA contacted the postsecondary institutions with satisfactory recent compliance histories, asking them to supply details about the academic program(s) they would offer under the experiment; their partnership with correctional institutions, and how many students and Pell Grant eligible students they estimated would enroll in their academic programs.
- FSA used the information supplied by interested postsecondary institutions as well as their characteristics (location, type of postsecondary institution, academic programs) to select a diverse group of qualified postsecondary institutions to participate in the experiment.

- FSA informed each postsecondary institution of their acceptance or denial of their application to participate in the experiment during May of 2016.

Program Participation Agreement Amendment Procedures

Before a postsecondary institution could begin implementing this experiment, the institution's Program Participation Agreement (PPA), with the U.S. Department of Education, had to be amended. Generally, the PPA allows postsecondary institutions to participate in Title IV programs. The amendment (provided as Appendix A to this report) includes:

- The name of the experiment and a brief summary of the experimental design and desired outcome
- All applicable exemptions and waivers permitted for experimental purposes
- School reporting requirements
- Procedures for withdrawing and terminating participation in the experiment

To help schools understand the requirements and flexibilities available in the PPA amendment, FSA conducted webinars with the interested postsecondary institutions which included a review of the experiment and the participation requirements. Postsecondary institutions that remained interested in participating in the experiment returned their signed PPA and could begin implementation of the experiment after receiving the counter-signed PPA from FSA.

FSA System Updates

To accommodate the postsecondary institution's participation in the experiment, postsecondary institutions participating in the Second Chance Pell experiment were identified within the Common Origination and Disbursement (COD) system, and the participating postsecondary institutions were provided procedures for reporting student-level data.

FSA Evaluation

As explained above, the primary reason Congress authorized the experimental sites program is to inform future decisions regarding certain statutory or regulatory requirements or prohibitions. The Department attempts to do this by monitoring and evaluating outcomes when the rules governing Title IV aid delivery are modified. In order to inform future Title IV statutory and policy decisions, the Department is charged with evaluating each of the experiments on a biennial basis.

All evaluations fall into one of two broad categories: formative or summative.³ The differences between formative and summative evaluations are timing, perspective, and the purpose of the evaluation rather than the research methods used. Formative evaluations are conducted during program development and implementation and are used to help refine the program or experiment while it is still underway. Summative evaluations address how well a program achieved its goals. The

³ <https://www.austinisd.org/dre/ask-the-evaluator/questions>

purpose of a summative evaluation is to determine whether a program had an effect on the stated “target,” to measure the magnitude of that effect, and in the case of randomized control trials, determine whether the program had an impact that was independent from other causes.⁴

In its second year of operation, the evaluation of the ESI Second Chance Pell experiment provided by FSA in this report is primarily formative. As the experiment moves forward and information from additional award years is collected and analyzed, FSA will be able to address aspects of a summative evaluation. However, this summative evaluation will largely focus on program characteristics, student success rates (while enrolled in the program and still incarcerated), and the statutory and regulatory changes that are required to enable institutions to serve inmates through this program in an efficient manner. This evaluation will inform future policy decisions in that it will highlight the additional regulatory changes required, if any, to enable effective administration of extending Pell grant program eligibility to incarcerated individuals.

It is not possible for FSA to conduct an evaluation of any causal relationships between making Pell grants available to inmates and improving key outcomes of returning citizens, such as improved employment and earnings and reduced recidivism. The Pell Grant eligibility of incarcerated individuals potentially affects the decisions of both people in prison to pursue higher education and postsecondary institutions to provide it. To fully address causality, the experiment would need to randomly select institutions to participate as educational providers and individuals from prison populations to be experimentally eligible for Pell Grants, comparing prisoner outcomes (and opportunities) with and without individual and institutional eligibility. Further complicating matters, in most cases, the prison determines which individuals, in their custody, may participate in this experiment, and often permission to participate is based on an inmate’s demonstrated responsibility and good behavior. Institutional (postsecondary and correctional) participation is voluntary in this experiment. The Department has not required postsecondary institutions to offer similar education programs nor use similar selection criteria. Due to the diverse nature and autonomy of American higher education institutions, it is not practical for the Department to require institutions to adhere to standard student selection and education delivery models. Therefore, the experiment does not enable us to evaluate the existence and nature of causal relationships between making Pell Grants available to inmates and longer-term outcomes.

There are other challenges associated with performing a rigorous experiment, including institutions being unable to track a participant’s outcomes if they transfer to another prison, move to another State, or reenter prison after release. Colleges and universities do not have access to information measuring these outcomes, especially if the participating student is subsequently incarcerated in a different prison or State. The Department is exploring ways in which it can work with other Federal

⁴ https://www.cdc.gov/nccdphp/dch/programs/healthycommunitiesprogram/tools/pdf/eval_planning.pdf

agencies to monitor longer-term outcomes, such as employment and earnings outcomes, reliance on Federal subsidy programs and return to prison. It will also likely take many years for participating students to finish their postsecondary program, complete their criminal sentence, and fully realize any labor market “returns” following release.

Even with these limitations, the Department’s evaluation of the Second Chance Pell experiment will provide valuable insight into the potential role that Pell grants could play in making educational opportunities more widely available to incarcerated individuals. The experiment will also highlight other statutory or regulatory changes that may be required in order to ensure that extending Pell Grant eligibility to incarcerated individuals could be efficiently and effectively administered by postsecondary institutions participating in Title IV. Finally, the experiment will provide a basis for making more accurate estimates of the potential costs and benefits of making the statutory and regulatory changes needed to provide Pell Grants to a larger population of incarcerated individuals.

Formative Assessment

School Participation

During the 2016-2017 award year (the initial year of the experiment), 52 postsecondary institutions from 23 States had signed a revised PPA and were actively participating in the Second Chance Pell experiment. In the following 2017-18 award year, the number of actively participating schools increased to 63. In this regard, “actively participating” means that the postsecondary institutions were enrolling incarcerated individuals who, as a result of this experiment, were eligible for consideration for Pell Grants. Any additional postsecondary institutions that had signed a PPA but were not actively participating during the 2016-2017 award year (13) were classified as “Not Participating.” The analysis of the Integrated Postsecondary Education Data Survey (IPEDS) data presented here includes only the 52 (2016-2017) and 63 (2017-2018) active participating schools during the indicated award year.

As FSA relied on voluntary participation in the experiment, results may not be representative of all Title IV eligible postsecondary institutions. To determine the degree to which participants differed from all Title IV postsecondary institutions, FSA reviewed five characteristics using data from IPEDS:

- **Region** – To determine if the experiment included postsecondary institutions from all regions of the United States- we created four regional categories: East, South, Midwest, and West.
- **Locale** – To determine if the experiment included postsecondary institutions from all types of metropolitan areas- we consolidated information about the location into four locale categories: City, Suburb, Town, and Rural.

- **Type of School** – To determine if the experiment included postsecondary institutions of all types, we created five categories- Public 4-year or above, Public 2-year, Public less-than 2-year, Private not-for-profit and Private for-profit.
- **Enrollment** – To determine if the experiment included postsecondary institutions of varying sizes, we defined three enrollment categories- Under 1,000 students, 1,000 to 4,999 students, and 5,000 or more students.
- **Tuition** – To determine the extent to which the experiment included postsecondary institutions across a wide spectrum of tuition levels, we sorted schools into three categories based on their tuition: lowest 25% (2016-2017: \$0 to \$4,768; 2017-2018: \$0 to \$5,122), middle 50% (2016-2017: \$4,769 to \$19,161; 2017-2018: \$5,123 to \$21,134), and highest 25% (2016-2017: \$19,162 or more; 2017-2018: \$21,135 or more).

The postsecondary institutions actively participating in the Second Chance Pell Experiment during either the 2016-2017 or 2017-2018 award year are listed in Table 1 by State, along with the five characteristics (discussed above) which were derived from IPEDS data. The Department notes that at least one participating institution provided distance learning education to incarcerated individuals in multiple States. The while IPEDS information in Table 1 reflects the values attributed to the main campus location, this institution actually served students in multiple States and regions of the country.

Table 1: Postsecondary Institutions Actively Participating in Second Chance Pell during the 2016-2017 and 2017-2018 Award Year by State

Publishing note: Please show title at the beginning of each page that includes Table 1.

State	School	Region	Locale	Type of School	Enrollment	Tuition
Alabama	Calhoun Community College	South	Rural	Public, 2 year	Highest 25%	Lowest 25%
	Auburn University	South	City	Public, 4 year	Highest 25%	Middle 50%
	Ingram State Technical College	South	Suburb	Public, 2 year	Lowest 25%	Lowest 25%
Arkansas	Arkansas State University – Newport	South	Rural	Public, 2 year	Middle 50%	Lowest 25%
	Shorter College	South	City	Private, not for profit	Lowest 25%	Lowest 25%
California	California State University - Los Angeles (2017-2018 only)	West	City	Public, 4 year	Highest 25%	Middle 50%
	Chaffey Community College	West	Suburb	Public, 2 year	Highest 25%	Lowest 25%
	Cuesta College	West	Suburb	Public, 2 year	Highest 25%	Lowest 25%
	Southwestern Comm College District (2017-2018 only)	West	Suburb	Public, 2 year	Highest 25%	Lowest 25%
Connecticut	Asnuntuck Community College	East	Suburb	Public, 2 year	Middle 50%	Lowest 25%
	Middlesex Community College	East	City	Public, 2 year	Middle 50%	Lowest 25%
	Quinebaug Valley Community College	East	Suburb	Public, 2 year	Middle 50%	Lowest 25%
	Three Rivers Community College	East	City	Public, 2 year	Middle 50%	Lowest 25%
Florida	Florida Gateway College	South	Town	Public, 4 year	Middle 50%	Lowest 25%
Iowa	Iowa Central Community College	Midwest	Town	Public, 2 year	Highest 25%	Middle 50%
Indiana	Holy Cross College	Midwest	Suburb	Private, not for profit	Lowest 25%	Highest 25%
Massachusetts	Mount Wachusett Community College	East	Rural	Public, 2 year	Middle 50%	Lowest 25%
Maryland	Anne Arundel Community College	East	Suburb	Public, 2 year	Highest 25%	Middle 50%

Second Chance Pell Experiment

State	School	Region	Locale	Type of School	Enrollment	Tuition
Maryland	Goucher College	East	City	Private, not for profit	Middle 50%	Highest 25%
	University of Baltimore	East	City	Public, 4 year	Highest 25%	Middle 50%
	Wor-Wic Community College	East	Rural	Public, 2 year	Middle 50%	Middle 50%
Maine	University of Maine – Augusta	East	Town	Public, 4 year	Middle 50%	Middle 50%
Michigan	Delta College	Midwest	Rural	Public, 2 year	Highest 25%	Middle 50%
	Jackson College	Midwest	Rural	Public, 4 year	Highest 25%	Lowest 25%
	Mott Community College	Midwest	City	Public, 2 year	Highest 25%	Lowest 25%
Minnesota	Pine Technical and Community College	Midwest	Town	Public, 2 year	Middle 50%	Lowest 25%
	Fond du Lac Tribal & Community College (2017-2018 only)	Midwest	Town	Public, 2 year	Middle 50%	Lowest 25%
	South Central College	Midwest	City	Public, 2 year	Middle 50%	Middle 50%
Nebraska	Metropolitan Community College	Midwest	City	Public, 2 year	Highest 25%	Lowest 25%
New Jersey	Raritan Valley Community College	East	Rural	Public, 2 year	Highest 25%	Lowest 25%
	Rutgers, the State University of New Jersey	East	City	Public, 4 year	Highest 25%	Middle 50%
New York	Bard College (2017-2018 only)	East		Private, not for profit	Middle 50%	Highest 25%
	CUNY Hostos Community College	East	City	Public, 2 year	Highest 25%	Middle 50%
	Marymount Manhattan College	East	City	Private, not for profit	Middle 50%	Highest 25%
	Mercy College	East	Suburb	Private, not for profit	Highest 25%	Middle 50%
	North Country Community College	East	Town	Public, 2 year	Middle 50%	Lowest 25%

Second Chance Pell Experiment

State	School	Region	Locale	Type of School	Enrollment	Tuition
New York	Nyack College	East	Suburb	Private, not for profit	Middle 50%	Highest 25%
Ohio	Ashland University	Midwest	Town	Private, not for profit	Highest 25%	Highest 25%
Oklahoma	Connors State College	West	Rural	Public, 2 year	Middle 50%	Lowest 25%
	Langston University	West	Rural	Public, 4 year	Middle 50%	Lowest 25%
	Tulsa Community College	West	City	Public, 2 year	Highest 25%	Lowest 25%
Oregon	Chemeketa Community College	West	Suburb	Public, 2 year	Highest 25%	Lowest 25%
Pennsylvania	Bloomsburg University of Pennsylvania	East	City	Public, 4 year	Highest 25%	Middle 50%
	Indiana University of Pennsylvania	East	Town	Public, 4 year	Highest 25%	Middle 50%
	Lehigh Carbon Community College	East	Suburb	Public, 2 year	Highest 25%	Middle 50%
	Villanova University	East	Suburb	Private, not for profit	Highest 25%	Highest 25%
South Carolina	Northeastern Technical College	South	Rural	Public, 2 year	Lowest 25%	Lowest 25%
Texas	Alvin Community College	West	Suburb	Public, 2 year	Highest 25%	Lowest 25%
	Clarendon College	West	Rural	Public, 2 year	Middle 50%	Lowest 25%
	Cedar Valley College (2017-2018 only)	West	Rural		Middle 50%	Middle 50%
	Lamar State College - Port Arthur	West	City	Public, 2 year	Middle 50%	Lowest 25%
	Lee College (2017-2018 only)	West	City		Middle 50%	Middle 50%

State	School	Region	Locale	Type of School	Enrollment	Tuition
Texas	Southwest Texas Junior College	West	Town	Public, 2 year	Highest 25%	Lowest 25%
	Wiley College (2017-2018 only)	West	Town	Private, Not for Profit	Middle 50%	Highest 25%
	University of Houston - Clear Lake	West	Suburb	Public, 4 year	Middle 50%	Middle 50%
Vermont	Bennington College (2017-2018 only)	East	Town	Private Not for Profit	Highest 25%	Lowest 25%
Virginia	Danville Community College	South	Town	Public, 2 year	Middle 50%	Lowest 25%
	Rappahannock Community College	South	Rural	Public, 2 year	Middle 50%	Lowest 25%
Wisconsin	Milwaukee Area Technical College	Midwest	City	Public, 2 year	Highest 25%	Lowest 25%
Washington	Centralia College (2017-2018 only)	West	Town	Public, 2 year	Middle 50%	Middle 50%
	Seattle Central Community College (2017-2018 only)	West	City	Public, 2 year	Middle 50%	Middle 50%
	Tacoma Community College (2017-2018 only)	West	City	Public, 2 year	Middle 50%	Middle 50%
West Virginia	Glenville State College	South	Town	Public, 4 year	Middle 50%	Middle 50%

Region

Using data from IPEDS, we examined the geographical representativeness of the postsecondary institutions participating in the experiment by creating four regional categories: East, South, Midwest, and West. Table 2 lists the specific States grouped within each of the four regional categories used in Figure 1 to compare the geographic distribution of postsecondary institutions participating in the experiment to the distribution of non-participating postsecondary institutions – that is all Title IV participants except the active participants in the Second Chance Pell experiment during the indicated award years.

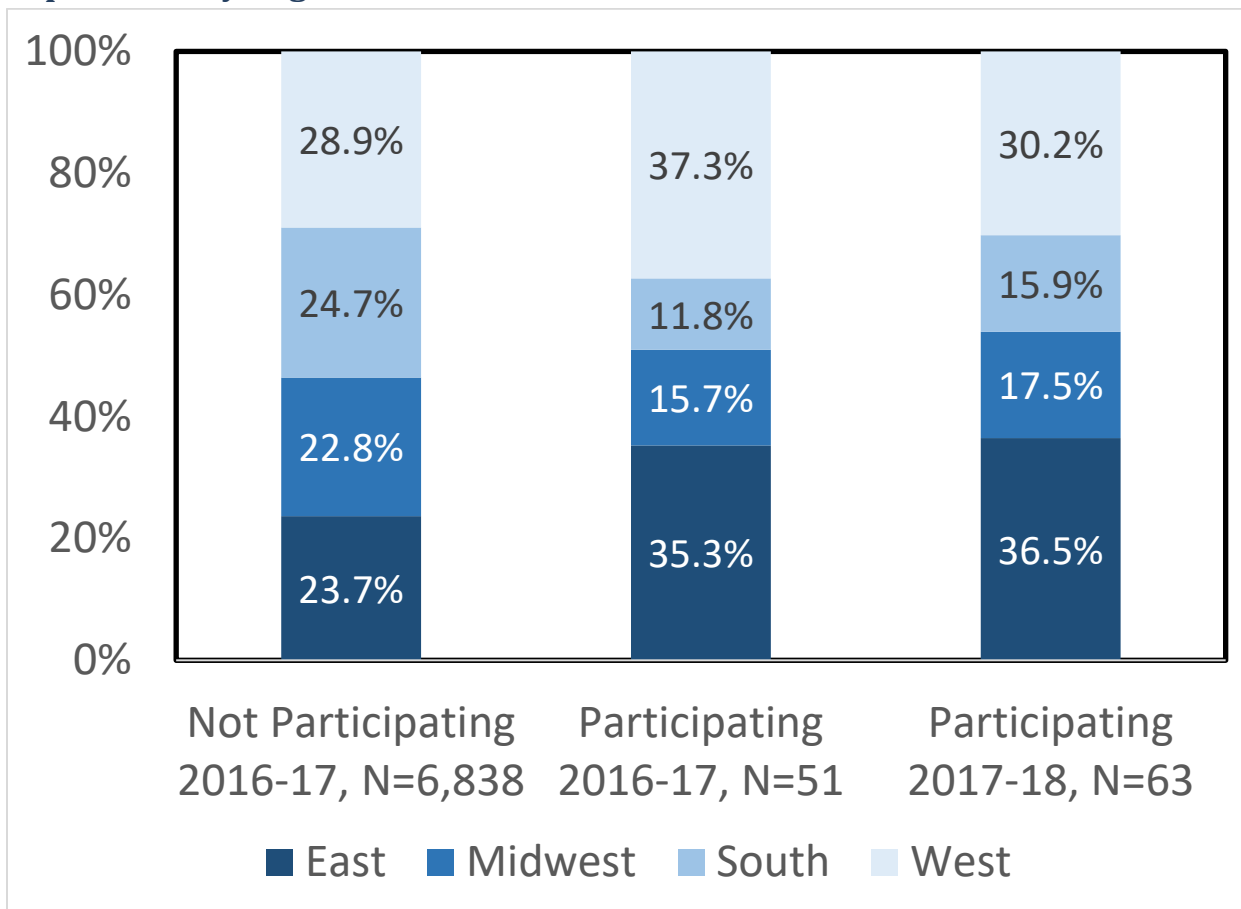
Included among the “non-participating” postsecondary institutions were a few postsecondary institutions that were invited to participate in the experiment, agreed to participate in the experiment, but decided, for various reasons, against participation in the experiment during the indicated award year.

Table 2: States by Region

East	South	Midwest	West
Connecticut	Alabama	Illinois	Alaska
Delaware	Arkansas	Indiana	Arizona
District of Columbia	Florida	Iowa	California
Maine	Georgia	Kansas	Colorado
Maryland	Kentucky	Michigan	Hawaii
Massachusetts	Louisiana	Minnesota	Idaho
New Hampshire	Mississippi	Missouri	Montana
New Jersey	North Carolina	Nebraska	Nevada
New York	South Carolina	North Dakota	New Mexico
Pennsylvania	Tennessee	Ohio	Oklahoma

East	South	Midwest	West
Rhode Island	Virginia	South Dakota	Oregon
Vermont	West Virginia	Wisconsin	Texas
			Utah
			Washington
			Wyoming

Figure 1: Postsecondary Institutions Actively Participating in the Second Chance Pell Experiment by Region



Observations

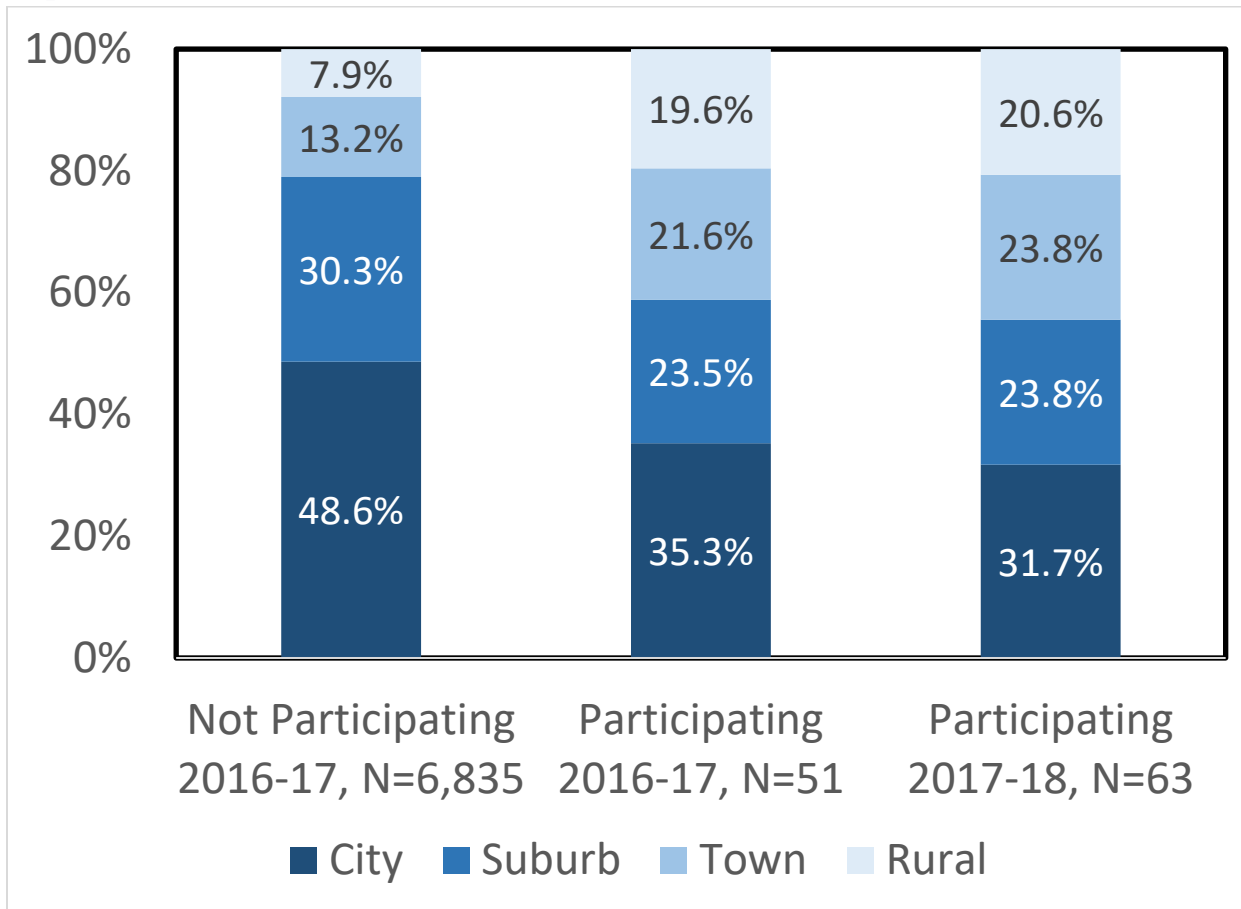
In this section of the report, the Department is providing descriptive data about the institutions that volunteered to participate in the experiment. However, we note that a single institution served almost one-third of the total number of students enrolled; thus, the student-level results may be biased by that overrepresentation. This institution is a large, private, non-profit institution that provides distance learning education to students at multiple correctional facilities. Therefore, if participation expands to include additional private, non-profit institutions, it is possible that the findings for that type of school could change.

Postsecondary institutions from all four regions participated in the Second Chance Pell experiment during its first two years. While postsecondary institutions from the East region were over-represented and those from the West and Midwest regions were under-represented relative to regional participation rates in Title IV programs more generally, postsecondary institutions from every region participated in the experiment. Given the Department of Education's desire to collect information from a sufficient number of postsecondary institutions and our dependency on voluntary participation, all postsecondary institutions that expressed interest in participating in the experiment that the Department of Education deemed administratively capable to adequately administer Title IV student aid programs were allowed to participate in the experiment. Therefore, the moderate over-representation of postsecondary institutions from the East region among participants represents heightened interest on the part of those schools.

Locale

Using IPEDS information on the type of community in which a postsecondary institution is located, we categorized locale as City, Suburb, Town, and Rural. Our classification combined original sub-categories of large, midsize, and small into single "City" and "Suburb" categories. Our recoding also removed the distinctions of fringe, distant, and remote from the "Town" and "Rural" categories.

Figure 2: Postsecondary Institutions Actively Participating in the Second Chance Pell Experiment by Locale



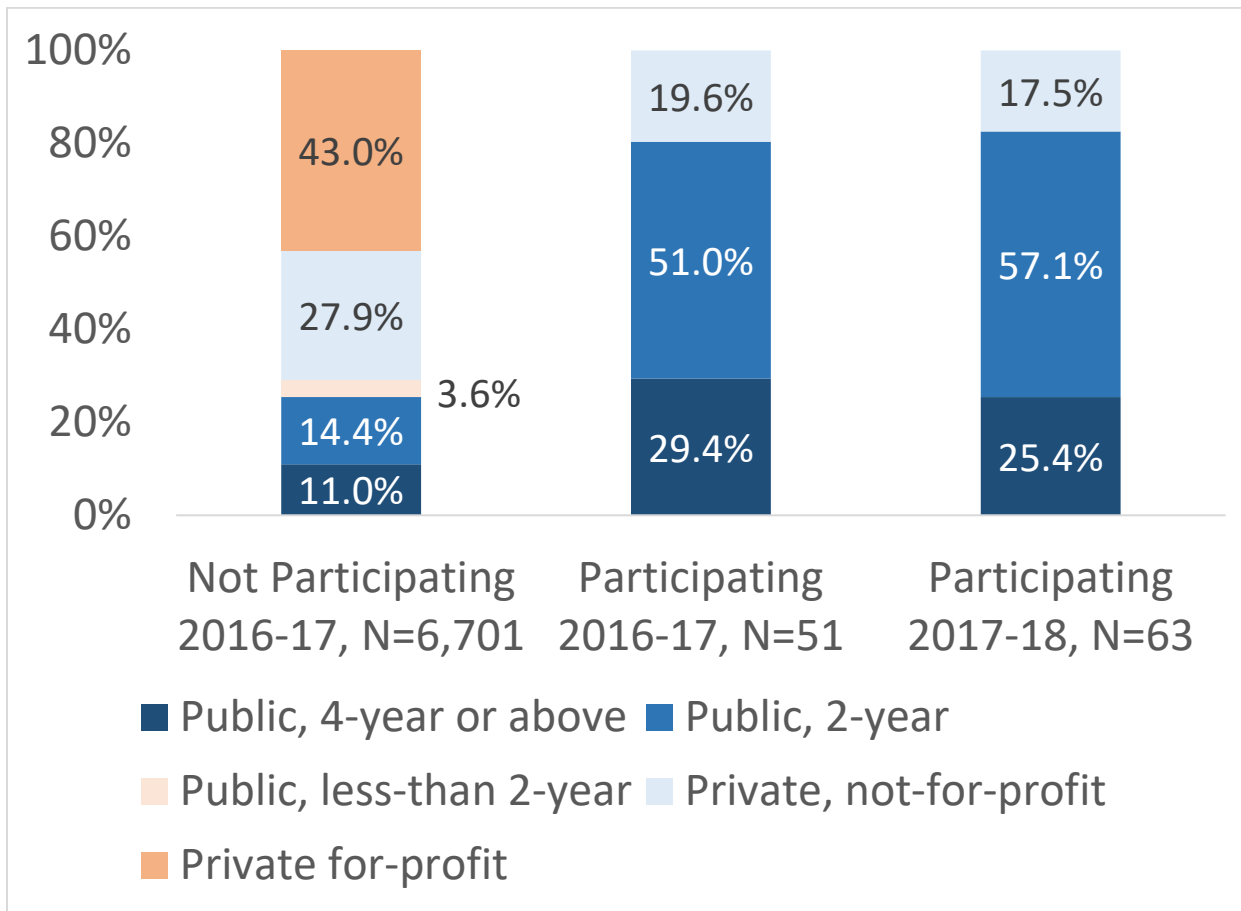
Observations

As was the case for regions, postsecondary institutions from all locale types participated in this experiment. While postsecondary institutions located in rural areas and towns were over-represented and schools in cities and to a lesser extent, suburbs were under-represented when compared to relative distribution of Title IV-participating schools in those locales. Nonetheless, the Department believes that there are a sufficient number of participating schools from each locale type to enable a meaningful analysis of implementation challenges and successes in a variety of schools .

Type of School

Combining IPEDS information on institutional control and program length, we categorized postsecondary institutions into one of five categories: private, proprietary; private not-for-profit; public less-than 2-year; public 2-year; or public 4-year or above. While IPEDS uses the same length of program classifications for private institutions (4 year or above, 2-year, and less-than 2-year), given the low participation rate of private institutions, for this analysis we combined all private proprietary institutions and all private not-for-profit institutions, respectively, into single categories. Only the three public sector categories distinguished postsecondary institutions by length of program.

Figure 3: Number of Postsecondary Institutions Actively Participating in the Second Chance Pell Experiment by Type



Observations

More than half of postsecondary institutions participating in the experiment were public, 2-year postsecondary institutions. No private proprietary postsecondary institutions participated, nor did any public “less than 2-year” institutions (though, given the very small number of public less than 2-year institutions that exist, it is not surprising that none participated in the experiment). Therefore, because the experiment did not include all types of institutions, nor did participation rates in the experiment match distribution rates in the total population of Title IV-participating IHEs, the results observed from this experiment may not apply to all institutions. We do not know which postsecondary institutions would offer postsecondary instruction to prison populations if the prohibition on providing Pell grants to incarcerated individuals was lifted.

Since school participation in the experiment was voluntary, these results only suggest that if eligibility for Pell Grants was expanded to include currently prohibited incarcerated students, public-2 year and public 4-year institutions would be the ones most likely to serve this population. This result may be due, in part, to the fact that other public subsidies, in addition to Pell Grants, reduce the cost of education to the students at public institutions. In addition, the participation of public institutions

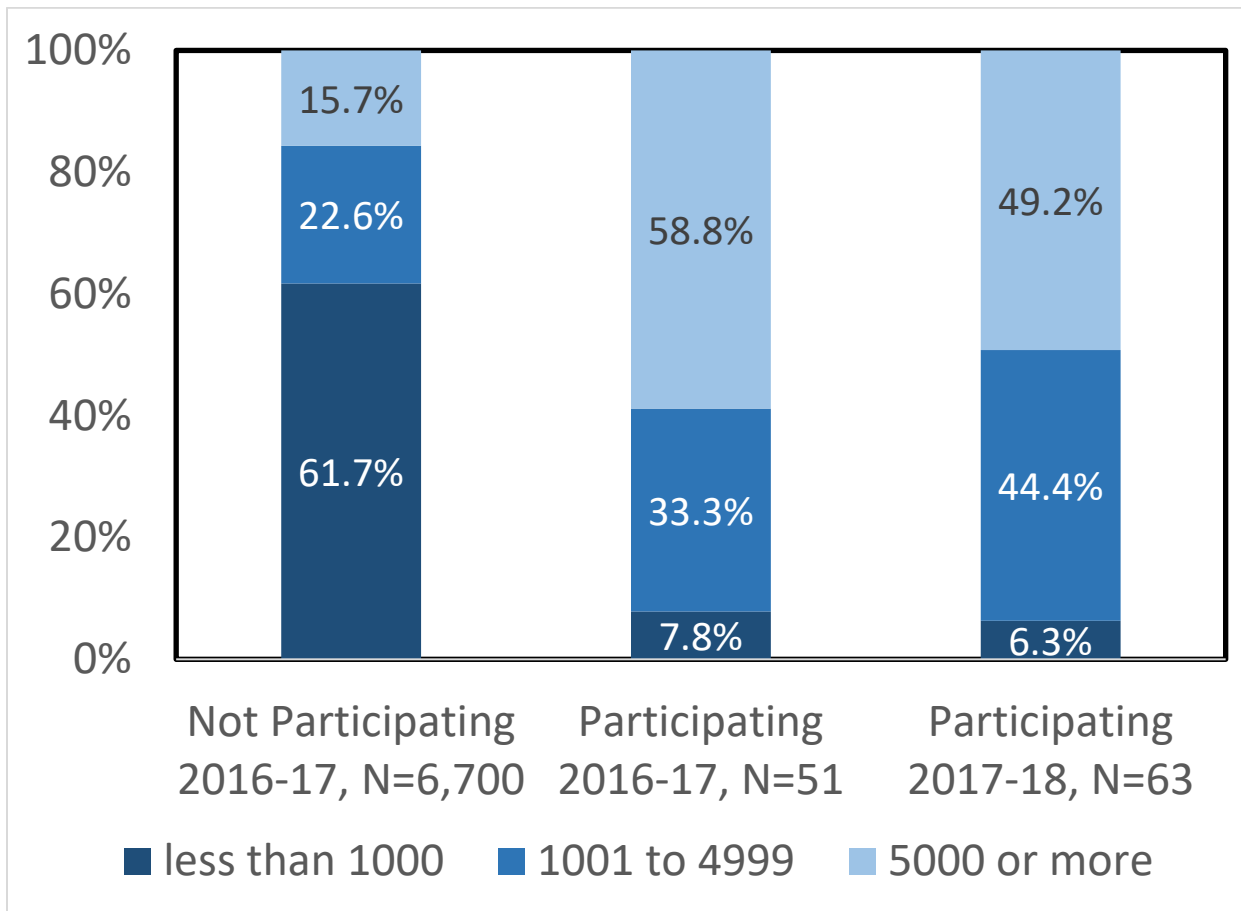
may also be driven by other goals of State government officials , including reducing the size of the prison population and reducing recidivism rates. It is likely more costly for a State to pay for an individual to be incarcerated than it is to subsidize the cost of their higher education and enable them to enter the workforce upon release. For public institutions, therefore, education subsidies for incarcerated individuals may make good economic sense, but the economics may look very different for private institutions that may be motivated by different factors, such as social benefit goals.

It is possible that the eligibility criteria established by the Department for postsecondary institutional participation, as well as normal limitations provided by Federal regulations and law, introduced bias regarding which postsecondary institutions volunteered or were accepted to participate in the experiment. The August 3, 2015, Federal Register Notice on Second Chance Pell made clear that postsecondary institutions selected for participation would need to “provide evidence that demonstrates a strong record on student outcomes and in the administration of title IV HEA programs, such as evidence of programmatic compliance, cohort default rates, financial responsibility ratios, completion rates, and, for for-profit institutions, “90/10” funding levels.” In addition, Section 472 of the HEA provides that cost of attendance for incarcerated students is limited to “tuition and fees, and if required, books and supplies” which can limit what services, amenities, and programs that participating postsecondary institutions can offer and charge to incarcerated students (limiting profitability in administering the experiment and offering academic programs to incarcerated students). These factors may have prevented some postsecondary institutions from applying or being selected to participate.

Enrollment

Using IPEDS total fall enrollment counts, we defined the following three postsecondary institution size categories: under 1,000, 1,000 – 4,999, and 5,000 and above.

Figure 4: Postsecondary Institutions Actively Participating in the Second Chance Pell Experiment by Enrollment



Observations

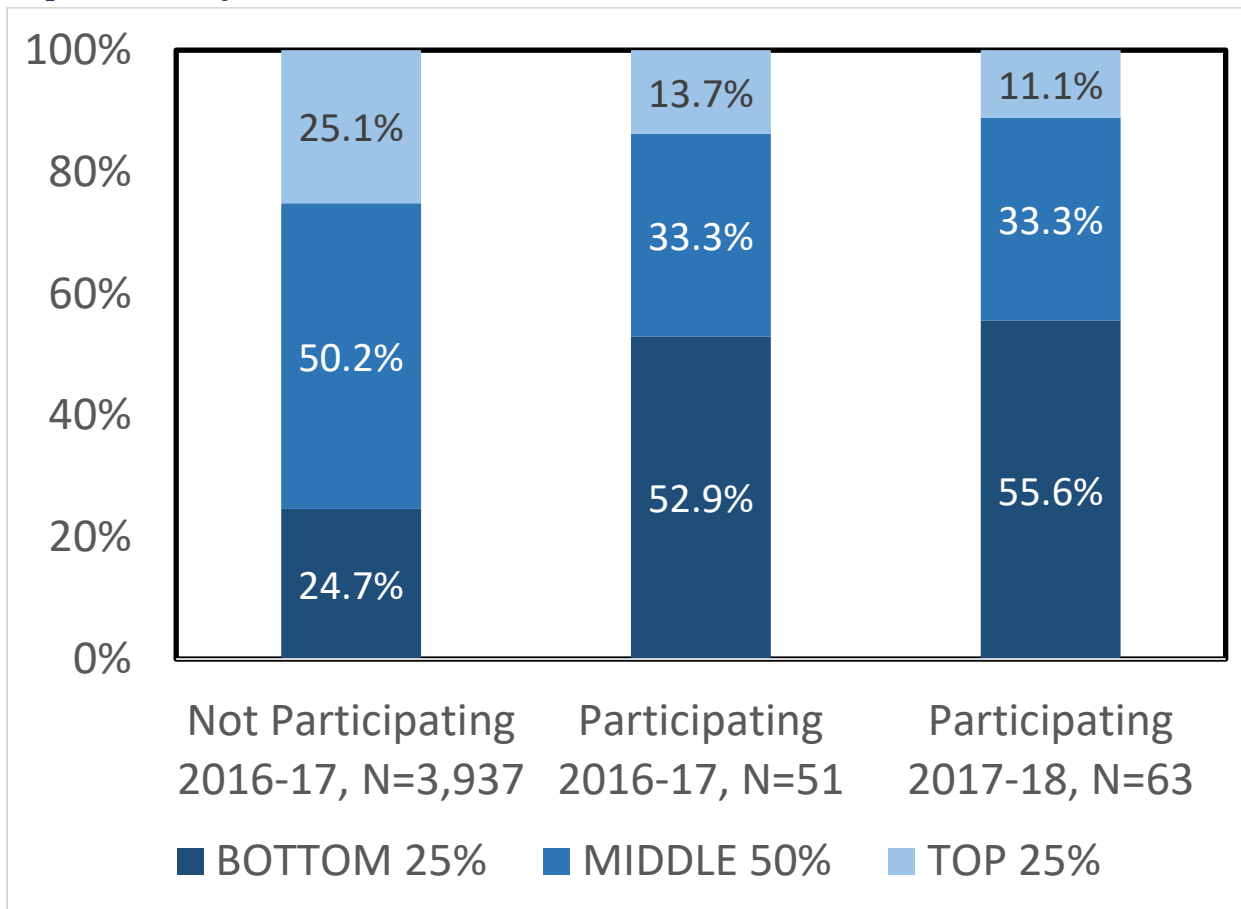
Postsecondary institutions in the smallest enrollment category, under 1,000 students, were dramatically underrepresented among participants in the experiment. This type of postsecondary institution accounts for just more than 60% of all postsecondary institutions but accounted for less than 10% of participants in this experiment. Participation among these institutions may have been limited due to the kinds of programs these institutions offer, since many small institutions offer only one or two academic programs that may be of limited interest to groups of students. In addition, because smaller institutions are typically more financially vulnerable and have limited staff resources, they may be underprepared or under-resourced to take on the responsibility of educating incarcerated individuals, or unable to serve enough students to make the program a worthy investment of time and resources for the correctional institution. It is also possible that prisons already have training programs for cosmetology or barbering, which is the focus on the largest number of small schools, and therefore do not need additional education programs, or that prisons will not enroll students in these programs as doing so provides ready access to instruments and chemicals that could be used inappropriately to harm others. Therefore, an expansion of Pell Grants

to include certain incarcerated individuals may not have an impact on enrollments at or Pell utilization by students enrolled at small schools.

Tuition

Using published, full-time (in-State, pre-financial aid) tuition data from IPEDS, we created three tuition categories. Schools were then placed in one of the three categories based on whether their tuition cost was in the highest 25% of all institutions, the middle 50% of all institutions, and lowest 25% of all institutions.

Figure 5: Postsecondary Institutions Actively Participating in the Second Chance Pell Experiment by Tuition



Observations

The least expensive schools (those with the lowest tuition) were over-represented amongst participants in this experiment. Postsecondary institutions with tuitions in the bottom quartile of all postsecondary institutions – in which the tuition for a full-time student was less than a maximum Pell Grant award – account for more than half of the participants in this experiment.

Summary

Postsecondary institutions from each region of the country and representing the full range of geographic types (urban, rural, etc.) participated in the experiment. However, public institutions, those with total enrollment more than 1,000, and those with low tuition participated in much higher

rates than other institutions. Therefore, an expansion of Pell grant eligibility to include incarcerated individuals may not result in equal distribution of enrollments across all institutional types, and may be most relevant to public 2-year institutions, though public and private 4-year institutions may also elect to serve those students.

School Implementation

During the 2016-2017 award year, the participating postsecondary institutions were at various stages of implementing the Second Chance Pell experiment. Fifty-two were “actively participating” in the experiment; that is, awarding Pell Grants to incarcerated students made eligible for Pell Grants by this experiment. By 2017-2018, eleven additional postsecondary institutions joined the list of active participants.

Postsecondary institutions implementing the Second Chance Pell experiment partnered with one or more correctional facilities to offer postsecondary academic courses to incarcerated individuals. Some of these partnerships between postsecondary institutions and correctional facilities existed prior to the introduction of this experiment; however, it is important to note that the experiment requires institutions to use Pell Grant funds to supplement, not supplant, existing investments by States, institutions, facilities or philanthropic organizations in prison-based education programs.

School Survey Results

To date 65 postsecondary institutions have returned a signed amended PPA to the Department of Education allowing them to participate in the Second Chance Pell experiment. Sixty-three of these 65 institutions responded to an FSA-administered survey that asked questions about their experiences conducting the experiment during the 2016-2017 award year. All 65 schools responded to the survey during the 2017-2018 award year.

The survey, which was identical in years 2016-17 and 2017-18, included questions that required both “closed” and “open-ended” responses. This evaluation provides a statistical analysis of all “closed” responses, and a sample of “open ended” responses that represent the breadth and nature of responses received from all participating institutions.

Challenges Schools Encountered

Participating postsecondary institutions confronted several common challenges as they implemented the experiment. During the fall of 2018, participants were asked to complete online surveys that captured their experiences implementing the experiment. While substantively identical, participating institutions were asked to complete an annual school survey. During the early fall of 2018, participants responded to questions about the 2016-2017 award year. Later in 2018, the Department collected school responses concerning the 2017-2018 award year.

Each survey asked respondents to: “Describe any challenges your postsecondary institution encountered in administering the Second Chance Pell experiment.” Several participants pointed to the challenges they had processing Free Application for Federal Student Aid (FAFSA®) forms from incarcerated students due to their restricted access to the internet. The responses included:

Financial Aid files were handled manually, which was time consuming and tedious. We could not use any automated processes for these students with regards to submitting FAFSA, completing verification, packaging aid, monitoring eligibility, disbursing Pell and reporting. The Financial Aid Office found all aspects of administering second chance Pell to be most challenging. Another primary problem is that students cannot be contacted through modern means (email, phone, etc.) and they do not have access to computers. These issues increases (sic) the time required to process financial aid eligibility.

Obtaining thorough and accurate information on the FAFSA continues to be our most challenging task. About 10% of our students must complete the FAFSA multiple times before all correct information is submitted. There are several reasons for this. Some students seem to have multiple SSNs, others have been selected for verification but have no way to track down tax forms from two years ago. Some just skip a required question. Students might be denied Pell funding for any one of the following reasons: 1. Under age 25, but essentially emancipated from parents with little or no contact. We have no appreciable way to collect parental financial information. 2. Did not register for selective service and are now too old to do so. Many students did not know that they needed to register; they were not in traditional high schools, do not have a driver's license, or were incarcerated as juveniles. Many of the traditional methods of registering were closed to them. 3. Default student loans. If our students took any kind of post-secondary coursework (including trade schools), they are almost certainly in default loan status. Obtaining HS transcripts or HSE certificates remains a challenge. Some schools have closed; in one case school records have been subpoenaed by the state and are not available to the public. Some records take months to obtain. We are working with new personnel in HCC Financial Aid in order to facilitate more accurate completion of the FAFSA during the first administration. I am hopeful that we can reduce the number of times students must complete the form.

Multiple schools singled out verification as being particularly challenging.

Our institution has found it challenging to complete the verification process. A majority of our students during 2016-2017 were selected for verification and we ran into many problems collecting tax returns, tax transcripts, W2s, parent information, etc. to complete the verification process. The IRS oftentimes rejected the 4506T request for tax information when the prison address was used. Many of our students had not registered for the selective service and/or were in default on prior student loans. Correctional staff worked directly with the student to set

up payments, which was very time consuming and was only successful if they had someone outside of prison who could assist them in making payments. Very few had someone on the outside to make the payments on their behalf, and if they did, correctional staff still need to assist the student with getting that arranged to ensure that the person on the outside had all of the proper authorities to make those payments. The students do not have access to technology so the entire financial aid process had to be completed on paper and then manually processed so it is more time consuming for financial aid staff than when we work with our traditional students.

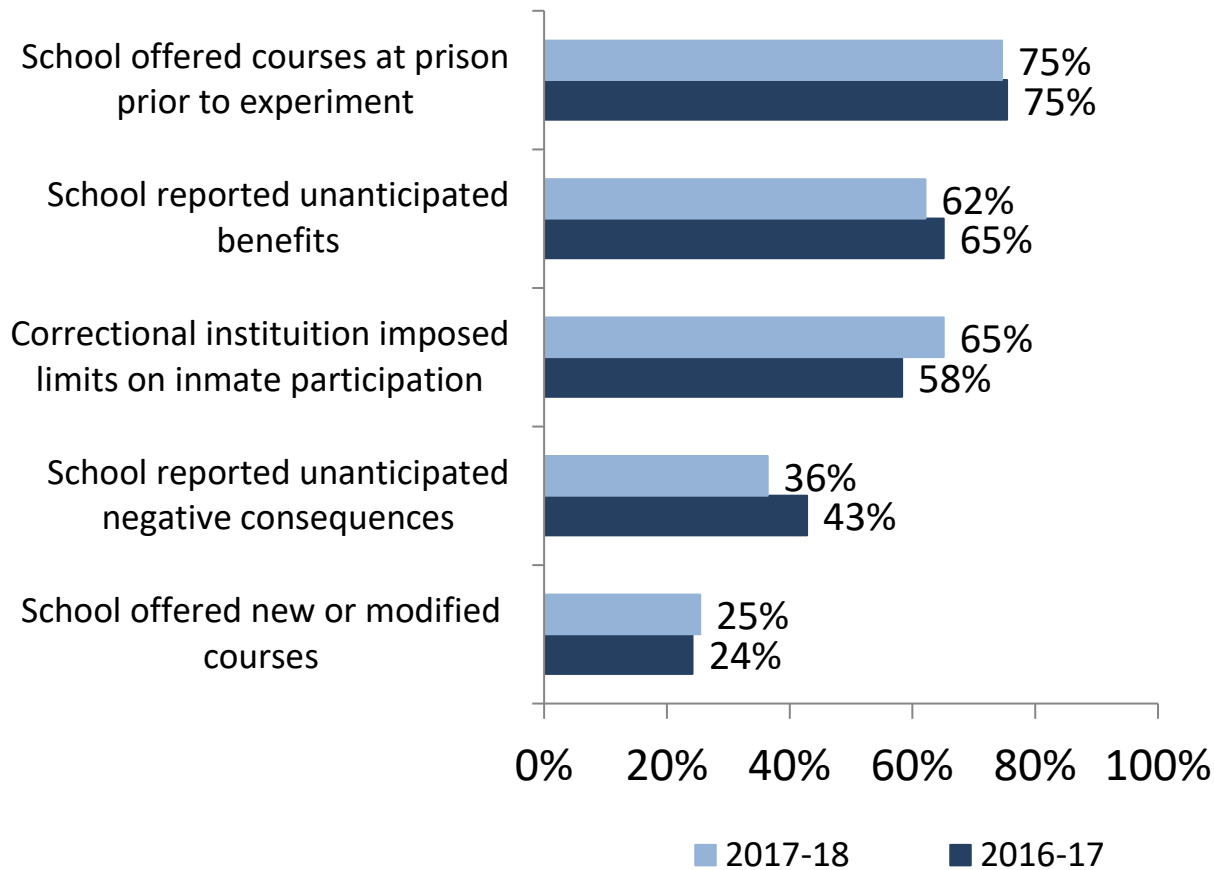
Ability to resolve verification - (i.e. student proximity, access to students, ability for students to produce documentation) Students in default of federal loans

IRS tax transcripts for tax filers continues to be a burden. Some students are never able to complete the verification process.

It is difficult to complete verification for these students, because we cannot simply mail the verification worksheets nor do they have online access to request tax transcripts, statements of non-filing status, etc. from the IRS. USDE should consider amending the verification requirements for this student population. Perhaps create a unique verification group? Similar issues are encountered when students have Comment codes regarding Selective Service, loan default, etc.

After collecting information on the “challenges” experienced, the survey asked participating postsecondary institutions several dichotomous “yes” or “no” questions about their implementation of the Second Chance Pell experiment. Figure 6 presents the percentage of participants responding “yes” to the five survey items of this type.

Figure 6: Percent of postsecondary institutions participating in the Second Chance Pell Experiment responding "Yes"



Sources: 2016-2017 Second Chance Pell School Survey, September 2018. N=63. 2017-2018 Second Chance Pell School Survey, November 2018. N=65.

These five survey questions were used to determine if the participating postsecondary institution already had an established academic program at a correctional facility, if they offered new or modified courses under the experiment, if they experienced unanticipated benefits or negative consequences, and if the correctional facility imposed limitations to student participation. Whenever a participant answered “yes” to a specific question, they were asked to provide additional details to elaborate on their response.

As seen in Figure 6, offering to incarcerated students participating in the Second Chance Pell experiment the same academic programs that are offered to the general student population was more common than creating/modifying programs for a correctional setting. Three quarters of the participating postsecondary institutions indicated that they offered unmodified courses to incarcerated students participating in the experiment. Below we provide several of the participants’ descriptions of these programs.

Our students complete the same Liberal Arts Associate's degree program as the students on campus. This is our most flexible academic program and allows each student to customize their degree with broad course choices. This is the most subscribed program on campus.

So far within the correctional facilities, we have offered courses in Welding, Supply Chain Management, Baking and Pastry Arts, Industrial Machinist, Business and Carpentry. The general nature of these programs not only matched up with interest of the students, but it also matched with the correctional facilities ability to host and hold course offerings within the walls. Their general space and facilities dictated much of what we could offer, so we looked at space and equipment requirements, and tried our best to match existing curriculum with student interest and ability, as well as instructional capacity, and offered the best courses we could to train students for future educational and employment opportunities.

[Redacted] staff enters the facility and teaches courses that are offered to our undergraduate population on the Main Campus. The only addition to our program was providing a free (non-credit bearing) precursory course called "College Prep" to ensure students entering the program [had] the writing and critical thought skills to be successful in the program.

Currently we offer our Associates of Arts in General Studies. Many of these courses are easily delivered and the degree transfers well.

Air Conditioning and Refrigeration Technology (Residential-Technical I Certificate) - Workforce Solutions of Greater Dallas's targeted occupations lists Heating and Air Conditioning (HVAC) mechanics as one of the high-growth areas this year, projecting 3,430 job openings at an average salary of \$21.09 per hour. America's Career Infonet projects job growth increase over the next decade of 22 percent for HVAC mechanics and installers. High job increase is defined as annual growth over 10 percent.

The College had previously offered the option of an associate's degree or a bachelor's degree program. While the academic program has not changed, the number of students we have been able to serve at the facility has increased. We are not at capacity (per said facility) and have a waitlist of students for future enrollment.

Unanticipated Benefits

FSA's school survey also asked if the participating postsecondary institution had "experienced unanticipated benefits" while participating in the Second Chance Pell Experiment. As indicated in Figure 6, approximately two-thirds of the participants indicated that they had experienced "unanticipated benefits."

When asked what unanticipated benefits participants experienced while administering the experiment, several participants pointed out that the experiment was allowing them to expand upon pre-existing programs aimed at providing postsecondary education to incarcerated individuals.

I think the Second Chance Pell project increased the college community's awareness of the work we were already doing with incarcerated students. As we reduce the stigma of working with incarcerated students, we increase the opportunities that those students have to better themselves and return to the community.

The [redacted] Prison Initiative has for years worked with students on financial aid and loan rehabilitation after they have left prison (in situations where students are still in the process of completing degrees after returning home). Through Second Chance Pell, this work has started much earlier, which means that students are more knowledgeable and better prepared once they leave prison and return home.

We are building stronger relationships with our Department of Corrections, as they work to provide access for us to complete the necessary financial aid work. As a direct result of the experiment, we now have a formally structured MOU with the DOC, resulting in clearer expectations on all ends. We have a truer understanding of the costs of our program. Our accounting within the college is much cleaner and is better documented with regard to program costs. The increased rigor in tracking the financials is driven by the need to have clear records for financial aid. We are more conscious of data accuracy and specificity.

The [redacted] Board of Regents and the President were very happy and supportive. [Redacted] saw an increase in demand for classes.

Other schools pointed to the positive experiences experimentally eligible students and their instructors were having.

Although only a few individuals were approved for Second Chance Pell, [those individuals] freed up funding for others who were not eligible or approved to utilize Second Chance Pell. Another unanticipated positive benefit has been to witness students who were approved to receive Second Chance Pell to seamlessly access traditional Financial Aid when they were released into the community due to their approval for Second Chance Pell while incarcerated.

... the level of commitment of the prisoners and how grateful they were for this opportunity.

We have received an overwhelming positive response from the instructors who have taught on-site to the Second Chance Pell students. They have truly enjoyed their time working with the students. In some departments in particular we have had other instructors ask to teach in this program because they have heard such great feedback from their colleagues.

One positive benefit was the increase in motivation and interest as the first students begin to graduate with their Associate of Arts-Direct Transfer degrees. Although the first cohort is still working, those who had prior college credits, are beginning to graduate. One person graduated in spring quarter and two more are graduating this quarter. This has led to increase interest

and is motivating those in the program to continue. The first two graduates, both earned highest honors and received the Presidential Medallion for earning a cumulative grade point average of 3.90 or above. Students on the main college campus are learning of this achievement, understanding the challenges the Second Chance Pell students have, and believing they could also do it. This is especially true of on-campus TRIO students. Students in this program are truly appreciative of the opportunity they are being given. They realize that this is an experiment and that the success of it depends upon them doing well not only in class but in life. Therefore, they have a strong incentive to stay out of trouble and follow prison rules. Moreover, they know that they could forfeit their Pell Grant if they are transferred out of the facility mid-quarter for disciplinary reasons. Most, if not all, of the students in this program are making a concerted effort to stay clear of all trouble and do well in courses. During the first few quarters of being in the program, students begin to identify themselves as college students instead of inmates. Students report that they have learned better time management skills that allow them to accomplish more and live life more fully. This gives them a sense of pride and the confidence to self-advocate for their needs in a productive, socially acceptable manner in many areas of their lives. Others in the prison are seeing this and it is raising the value of education within the prison. Thereby, changing the prison culture.

A wonderful opportunity for faculty, graduate student, and undergraduate engagement in diversity, professional development, and personal enrichment while fulfilling [redacted]'s land grant mission of giving back to the state of [redacted] and its people.

- Extraordinarily positive experience working with this population. Opportunity to provide this program has been transformative for our institution, staff and faculty. - Created opportunity to expand services to other incarcerated individuals as well. - Participants and succeeding at an impressive level and most are maintaining their academic commitment even after being released.

Restrictions on Student Participation

The school survey asked if “the correctional institution restricted the participation of any incarcerated individual(s) in the postsecondary opportunities offered under this experiment?” As shown in Figure 6, well more than half (58% in 2016-2017 and 65% in 2017-2018) of the participating schools indicated that the correctional institutions they were working with imposed restrictions affecting which inmates the prison allowed to participate in the experiment.

The specifics of the exclusions (requirements) varied across correctional institutions. We provide several examples below.

More serious offenders weren't allowed to participate.

Student must be infraction free for six months and be within ten years of their scheduled release date.

The correctional facilities limit participation in the Second Chance Pell Grant program to those inmates deemed in good standing, according to established [redacted] Dept. of Corrections policies.

If an inmate violated prison rules, he could lose the ability to participate in the college classes. It was situational on a case-by-case basis and the inmates are generally aware of the potential consequences of breaking the rules.

Did not allow for inmates serving life sentences or sexual offenders or inmates with negative institutional adjustment.

Any inmates who were deemed to be a poor representative (based on the type of offense they committed, or who would cause the victim's families distress by their participation were screened out by the correctional facility.)

The corrections facility generated a list of students based on criteria such as past offenses, behavior issues, and other internal limits. Then that list was narrowed down based on other criteria set by corrections.

The very first day our group came in to do the FAFSA's and ACCU-Placer test, there was a FIGHT! BOTH of the Inmates were immediately eliminated from the program. At OTHER times, IF an inmate did NOT comply with what was necessary, they were expelled from the program. However, in defense of the correctional institution, these inmates could be recalcitrant and by disobeying regulations.

At the state facility, they do not limit participation. However, at the federal facility, inmates are required to be on good behavior for at least one year prior to entering the program.

The warden at each unit has the final say on who is eligible to attend classes. Some students are not allowed due to disciplinary actions, work schedules or approaching release date.

It was limited by the number of prisoners in a class, due to safety and prison protocol.

They decide who can participate in educational programs even if they are Pell eligible. Disciplinary actions and [redacted] jobs keep student from participating in the educational program.

Some of our students were transferred to other facilities.

They do not initially limit any students, however if a student is enrolled in courses and receives multiple infractions (and multiple "lock ups") the prison will not allow that student to continue to participate in our program.

Such conditions and restrictions may be very understandable from the correctional institutions' point of view. However, as described earlier in this evaluation, these conditions and restrictions likely introduce selection bias into the experiment. The results of this experience, therefore, may not reflect the outcomes that would be achieved if a more expansive approach was taken to permit incarcerated individuals to receive Pell Grants and participate in postsecondary programs.

Unintended Negative Consequences

The survey also asked about the "unintended negative consequences" associated with implementing the experiment. While less than half of the postsecondary institutions reported that they had experienced unexpected negative consequences (see Figure 6), those participants that referred to the difficulties they experienced that were due to the lack of or restricted access to modern communication tools while in prison.

[It] would have been helpful if inmates had access to [the] internet to complete the FAFSA forms; add college code number to FAFSA, etc.

The challenges in following well-intended federal regulations is very burdensome without saving the government significant funds for this population. These students are not dependent on a spouse or parents. They are dependent on the government. They make about \$200 per year. They should be automatically [in]dependent and separated. Their EFCs should be automatically \$0. They have virtually no income and no support. Some students are being excluded from the program because of these roadblocks.

We try to help as many inmates as possible so we allow them to start classes while they try to complete their fafsa's since everything is done by mail it takes weeks to get information from all the agencies involved, IRS, Social Security, etc. When fafsa's can't be successfully completed, we cover the costs of the classes so the students receive grades and course credit. We are glad to do this and will continue to, but it is costly.

Administering the process requires a significant commitment of resources. Changes to the verification process would make a substantial difference.

Participating postsecondary institutions also lamented the additional work that was involved in participating in the experiment.

The politics in general of offering courses in a prison and on campus environment drew some negative attention to the college. The amount of coordination and additional work has been enormous. (We thought this would be easy)

Just not enough staff on campus to keep up with everything. Found myself having to work extra hours to accomplish verification, disbursement maintenance and all of the reporting. Mainly the year end reports that require the extra columns of information. ...

Although we are committed to administering the Second Chance Pell program an unintended negative consequence we have experienced is this program tends to be very labor intensive and involves a lot of manual data entry and multiple in person interactions with students participating the in program.

As stated above and shown in Figure 6, only one quarter of participating institutions indicated that they had added or modified courses especially for incarcerated students. This minority of schools, who created or modified an academic program, were asked to describe the correctional institutional course offerings. These descriptions generally depicted modifications of existing academic courses to accommodate the correctional environment.

Classes were modified to remove the use of any electronic equipment and internet, but still meet the educational outcomes of the program.

The curriculum stayed the same for the most part, but we had to refrain from use of online resources for the inmates and supplemental materials. The use of the internship had to be replaced by a course.

It is the same Communications Studies BA degree completion program we would offer on the main campus but we have to flexible with the ordering of classes and the pace which is different (we are only able to offer 2 classes a semester per cohort in the prison because of space limitations)

While less common, some participants also indicated that they created new courses.

[Redacted] added the following short-term certificates to our existing programs at [Redacted] Correctional Facility:

Design Drafting Technology	CIP Code 15.1301	
Design Drafting - Applied Architectural		26 semester hours
Design Drafting - Applied Civil		25 semester hours
Design Drafting - Basic Design		27 semester hours
Design Drafting - Applied Electro-Mechanical		26 semester hours
Horticulture	CIP Code 01.0601	
Horticulture - Creation and Care		26 semester hours
Horticulture - Plant Production		26 semester hours

An online associate General Studies Associate Degree was created for these students.

Staff Roles

The school survey also included questions that were not dichotomous, meaning answers were not limited to “yes or no (and elaborate if yes)”. One of these survey questions asked the participating postsecondary institution to describe the roles that postsecondary and correctional institution staff assumed while facilitating FAFSA completion among incarcerated applicants. Nearly all participants stated that the postsecondary institutional staff took primary (if not exclusive) responsibility for informing potential students about the FAFSA application process.

The Office of Student Financial Services staff traveled to our [redacted] Correctional Facility to meet with and assist students with completing the FAFSA process.

The Financial Aid Office staff, as well as the Coordinator of the program and educational liaisons at the facilities, go into the institutions and help the student’s complete paper FAFSAs and verification documentation.

[Redacted] staff entered the facility to assist students in completing the paper FAFSA, assuring accuracy, and then bringing them back to campus for processing.

We had to hire a consultant to go to the prison several times with paper FAFSAs (printed in-house at the college's expense). He helped the students complete the questions on the FAFSA. Then, the FAFSA forms were brought to the Financial Aid Office where staff members entered the data on the FAA Access to CPS online website. Follow up was required in most cases, including students who (unknown to us) had already completed the FAFSA.

Our Director of financial aid came to the prison to assist the inmates in filling out their FAFSA paperwork and to assist in enrollment into the college.

The school's Financial Aid Counselor conducts on-site FAFSA workshops once or twice each semester, to instruct and assist in FAFSA completion. The Financial Aid Counselor then enters the completed application information into the Dept. of Educations central processor.

We hold fafsa sessions in each facility to assist in completing the paper fafsa. We then manually enter that info into FAA Access to speed the return of ISIRs so we can get the rejects and verifications in to begin trying to collect that information. We then work with the inmates to try to get the information necessary to complete their fafsas. This is a huge challenge and a lot of work for our staff to coordinate efforts with the inmates.

The postsecondary institution staff completing the survey indicated that correctional institution staff primarily provided logistical support during their FAFSA education efforts.

We do not rely on [redacted] staff to assist with the applications other than to scan Inmate Interview Requests regarding the Second Chance Pell to [redacted] from the facility.

The prison staff granted our consultant access to the facility, arranged room scheduling, escorted inmates to the meeting and provided safety measures to all involved.

Notifying the inmate(s) of times when institution would be at the unit. Assist with lay-ins.

The correctional institution provides access for the college staff, security, classroom space and lab space, as well as staff to assist with student registration/enrollment.

Other participants described how, in some cases, staff at correctional institutions also assisted incarcerated students with their FAFSA applications, but that the help tended to focus on assisting the FAFSA applicant secure required documentation.

The (correctional) staff learned how to assist the inmates to complete the FAFSA.

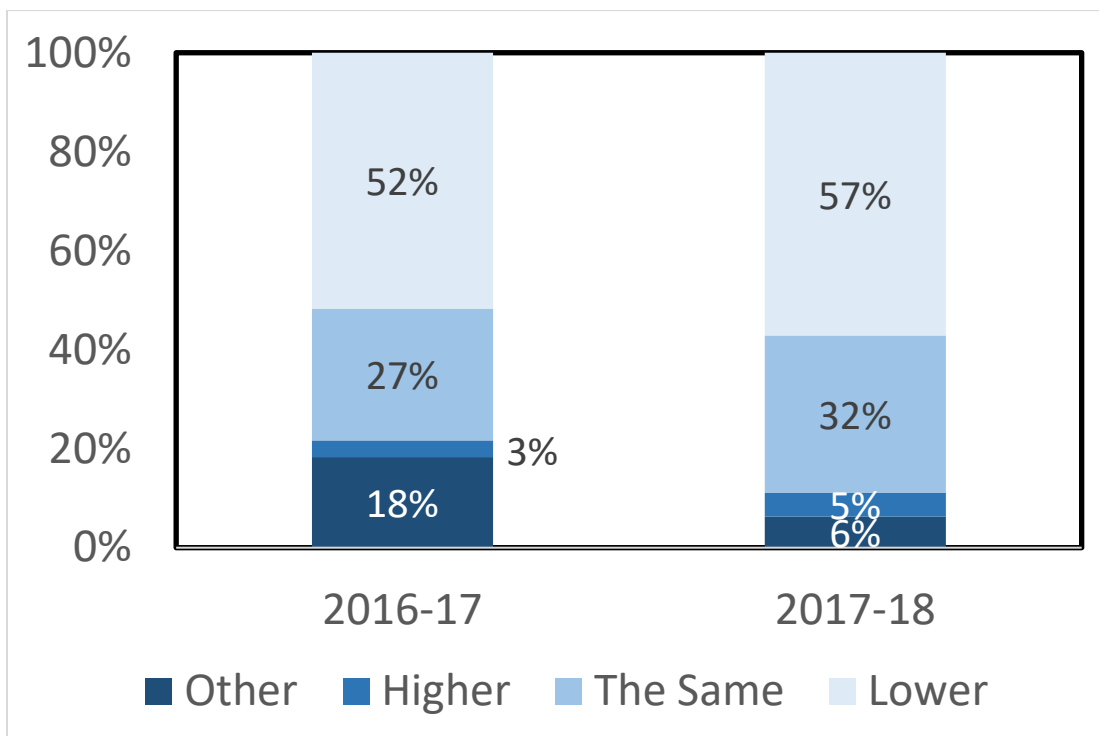
... staff at both correctional facilities encourage their students to complete the FAFSA and assists them in completion of any required documentation requested by the financial aid office.

Correctional staff establish times for meetings, request attendance of students, and when needed, locate documents such as IDs, GED completion evidence.

Tuition Charged

The school survey also asked if the institution charged the same or different tuition to incarcerated students, as opposed to the general student population served.

Figure 7: Tuition after Implementing the Second Chance Pell Experiment



Sources: 2016-2017 Second Chance Pell School Survey, September 2018. N=63. And 2017-2018 Second Chance Pell School Survey, November 2018. N=65.

As shown in Figure 7, more than half of the participating postsecondary institutions in both award years reported charging incarcerated students less than other students; even though offering courses and programs at correctional facilities may have resulted in additional institutional overhead.

Approximately one quarter of schools reported charging “the same” and smaller percentage of schools (18% in 2016-2017 and 6% in 2017-2018) reported “other.” Respondents who selected “other” were asked to describe tuition and fees charged to incarcerated students. These explanations often revealed that the selection of “other” was due to the postsecondary institution supplying and charging the student directly for textbooks and other course materials rather than having students buy these course materials independently (something that would be difficult if not impossible for inmates to do). It is not yet clear to the Department whether institutions purchasing textbooks on behalf of their students are aware that this practice changes the way that return-to-title-IV must be calculated for these students, based on the Department’s regulations regarding institutional charges. Conversely, the Department may need to consider a different regulatory requirement for institutions serving students who do not have access to purchasing materials independently.

All tuition charges are identical across all locations and modalities. Second Chance Pell students are charged a special fee which allows the college to provide textbooks and other required course supplies to them via Pell. There is no resulting difference in net cost to students across locations; non-incarcerated students have the added responsibility of procuring their own course supplies and textbooks.

Two participating postsecondary institution explained that they charged all Second Chance Pell students similar, but not identical tuition.

[Redacted] University has many different tuition rates for programs. It was decided to charge tuition for these (incarcerated) students at the same level as our lowest priced undergraduate program.

On campus we have a range of tuition rates that vary based on type of enrollment. For instance, an online class has a slightly different tuition than a campus class does. Our tuition for the prison education program is in a similar range as the campus tuitions. --The fees are different than on campus. We do not charge the campus fees for labs, technology use, etc. in the prison program. Rather we have fees designed to cover the cost of our book and material service and the supplemental effort required in travel and student servicing. For the incarcerated students, we also waive application fees and graduation fees.

Student-Level Data

The Department collected student-level data from each institution for students who applied for Title IV Federal student aid under the experiment. These data were collected for both the 2016-2017 and 2017-2018 award years.

FSA Systems / COD / Upload Process

In order to minimize the reporting burden on the postsecondary institutions participating in the experiment and maximize the accuracy of the information used in the analysis, FSA utilized the data extracted from FAFSA applications whenever possible. Each participating postsecondary institution was required to identify FAFSA applicants that were participating in the experiment, and to report additional information about those students, through the Common Origination and Disbursement (COD) system that all Title IV-eligible postsecondary institutions use to process Title IV Federal student aid. Participating postsecondary institutions uploaded an Excel template using the ESI Reporting Tool within COD. This template collected student identifying information that allowed the Department of Education to obtain and link other data (that had already been collected during the process of determining an applicant's eligibility for Title IV Federal student aid) for the evaluation of the experiments. In addition to the applicants' identifying information, the ESI template also gathered information about the applicant's postsecondary experience, which also was not generally available to FSA.

Student Participants

Table 3 presents the number of "applicants" – individuals completing a non-rejected FAFSA, applying to enroll in each postsecondary institution participating in the Second Chance Pell Experiment. Table 3 also provides the number of Pell Grant recipients. There was substantial variation in the number of individuals participating at different schools. The number of applicants in the 2017-2018 award year ranged from a low of 4 to a high of 2,473.

Table 3: Number of Applicants and Pell Grant Recipients at Each Postsecondary Institution Actively Participating in Second Chance Pell during the 2016-2017 and 2017-2018 Award Year by State and School

State	School	Number of Completed FAFSAs 2016-2017	Number of Pell Grant Recipients 2016-2017	Number of Completed FAFSAs 2017-2018	Number of Pell Grant Recipients 2017-2018
Alabama	Calhoun Community College	11	11	5	5
	Auburn University	17	17	33	33
	Ingram State Technical College	97	97	140	23
Arkansas	Arkansas State University – Newport	Missing data	Missing data	34	34
	Shorter College	414	409	544	541
California	California State University – Los Angeles (2017-2018 only)	Not participating	Not participating	9	6
	Chaffey Community College	28	28	75	1
	Cuesta College	Missing data	Missing data	245	106
	Southwestern Comm College District (2017-2018 only)	Missing data	Missing data	21	13
Connecticut	Asnuntuck Community College	Missing data	Missing data	334	279
	Middlesex Community College	24	21	30	28
	Quinebaug Valley Community College	Missing data	Missing data	101	92
	Three Rivers Community College	Missing data	Missing data	37	35
Florida	Florida Gateway College	63	61	66	62
Iowa	Iowa Central Community College	129	122	162	154

Second Chance Pell Experiment

State	School	Number of Completed FAFSAs 2016-2017	Number of Pell Grant Recipients 2016-2017	Number of Completed FAFSAs 2017-2018	Number of Pell Grant Recipients 2017-2018
Indiana	Holy Cross College	27	27	23	16
Massachusetts	Mount Wachusett Community College	57	33	73	73
Maryland	Anne Arundel Community College	16	16	16	16
	Goucher College	112	51	91	52
	University of Baltimore	Missing data	Missing data	54	53
	Wor-Wic Community College	Missing data	Missing data	34	34
Maine	University of Maine – Augusta	38	28	59	54
Michigan	Delta College	13	13	30	26
	Jackson College	1005	500	1335	702
	Mott Community College	Missing data	Missing data	44	40
Minnesota	Pine Technical and Community College	30	30	Missing data	Missing data
	Fond du Lac Tribal & Community College (2017-2018 only)	Not participating	Not participating	9	7
	South Central College	15	13	15	12
Nebraska	Metropolitan Community College	Missing data	Missing data	20	7
New Jersey	Raritan Valley Community College	395	274	407	295
	Rutgers, the State University of New Jersey	63	32	67	47
New York	Bard College (2017-2018 only)	Not participating	Not participating	81	80
	CUNY Hostos Community College	20	18	33	31

Second Chance Pell Experiment

State	School	Number of Completed FAFSAs 2016-2017	Number of Pell Grant Recipients 2016-2017	Number of Completed FAFSAs 2017-2018	Number of Pell Grant Recipients 2017-2018
New York	Marymount Manhattan College	53	53	75	74
	Mercy College	104	59	155	101
	North Country Community College	Missing data	Missing data	206	193
	Nyack College	71	71	91	88
Ohio	Ashland University	1395	924	1719	1132
Oklahoma	Connors State College	142	142	297	258
	Langston University	6	6	56	55
	Tulsa Community College	93	67	115	60
Oregon	Chemeketa Community College	54	54	65	64
Pennsylvania	Bloomsburg University of Pennsylvania	24	16	50	19
	Indiana University of Pennsylvania	1	1	19	19
	Lehigh Carbon Community College	22	22	31	31

State	School	Number of Completed FAFSAs 2016-2017	Number of Pell Grant Recipients 2016-2017	Number of Completed FAFSAs 2017-2018	Number of Pell Grant Recipients 2017-2018
Pennsylvania	Villanova University	3	3	Missing data	Missing data
South Carolina	Northeastern Technical College	Missing data	Missing data	54	48
Texas	Alvin Community College	396	88	448	95
	Clarendon College	146	71	177	99
	Cedar Valley College (2017-2018 only)	Not participating	Not participating	15	13
	Lamar State College - Port Arthur	243	109	377	194
	Lee College (2017-2018 only)	Not participating	Not participating	2373	631
	Southwest Texas Junior College	105	41	21	13
	Wiley College (2017-2018 only)	Not participating	Not participating	154	125
	University of Houston - Clear Lake	59	59	93	62
Vermont	Bennington College (2017-2018 only)	Not participating	Not participating	4	2
Virginia	Danville Community College	24	24	66	39
	Rappahannock Community College	Missing data	Missing data	52	39
Wisconsin	Milwaukee Area Technical College	Missing data	Missing data	129	127
Washington	Centralia College (2017-2018 only)	Not participating	Not participating	14	4
	Seattle Central Community College (2017-2018 only)	Not participating	Not participating	30	30
	Tacoma Community College (2017-2018 only)	Not participating	Not participating	21	21
West Virginia	Glenville State College	Missing data	Missing data	285	170

Characteristics of Student Participants

Our analysis of student participants focused largely on characteristics typically associated with Pell eligibility, based on data collected in the Department’s COD system. Specifically, we examined the

applicant’s Title IV dependency status (dependent or independent-as defined by the HEA), Pell Grant eligibility, and the attendance status (part-time or full-time) of the incarcerated individuals who applied for an experimental Pell Grant by completing a FAFSA.

Tables 4 (2016-17) and 5 (2017-18) show student characteristics in aggregated, and by institutional control.

Table 4: Descriptive Statistics of Incarcerated Individuals Who Applied to Participate in the Second Chance Pell Experiment: 2016-2017

	All Schools N=8,212	Public 4- Year N=1,468	Public 2- Year N=4,540	Private not for profit N=2,192
Dependency Status ⁵				
Dependent	1.2%	2.0%	0.8%	1.4%
Independent	98.8%	98.0%	99.2%	98.6%
EFC ⁶ Amount				
0	97.8%	96.9%	98.2%	97.5%
1 to 5234	1.4%	2.1%	1.2%	1.6%
5235 or more	0.8%	1.0%	0.6%	0.9%
Attendance Status				
Attended	89.9%	99.5%	84.3%	98.8%
Did not Attend	10.1%	0.5%	15.7%	1.2%

⁵ Dependency Status: The FAFSA asks a series of questions to determine whether the student is dependent or independent. These include age, marital status and the level of education being pursued. Applicants 24 years old or younger, single, and pursuing their first undergraduate degree are generally considered “dependent” on their parents. The FAFSA also asks about military service, the student’s own children and other dependents, homelessness, minor emancipation, and if the student’s parents are deceased. If one or more of these questions are answered with a yes, the student is considered an independent student. Dependent students must report income and asset information both for themselves and for their parents, while independent students report such information only for themselves and (if applicable) their spouses.

⁶ EFC: Expected Family Contribution (or EFC) is a measure of a family’s financial strength and is calculated according to a formula established by law using the information students report on the FAFSA. A family’s taxed and untaxed income, assets, and benefits (such as unemployment or Social Security), family size, and the number of family members who will attend college are all considered in the formula.

Table 5: Descriptive Statistics of Incarcerated Individuals Who Applied to Participate in the Second Chance Pell Experiment: 2017-2018

	All Schools N=10,844	Public 4- Year N=2,103	Public 2- Year N=5,789	Private not for profit N=2,945
Dependency Status				
Dependent	1.6%	2.4%	1.4%	1.5%
Independent	98.4%	97.6%	98.6%	98.5%
EFC Amount				
0	97.4%	97.2%	97.7%	97.0%
1 to 5328	1.7%	2.0%	1.5%	1.9%
5329 or more	0.9%	0.8%	0.8%	1.1%
Attendance Status				
Attended	89.8%	94.7%	84.1%	94.6%
Did not Attend	10.2%	5.3%	15.9%	5.4%

Note that nearly all the applicants to the Second Chance Pell experiment were considered independent and had a calculated Expected Family Contribution (EFC) low enough to be eligible for a Pell Grant. We observed these two patterns in both award years and for all three school types of schools participating in the experiment. Finally, note that while experiment-wide, approximately 9 in 10 applicants did in fact wind up attending an institution, nearly all decisions not to attend after completing a FAFSA occurred among those inmates who applied to attend Public 2-Year postsecondary institutions participating in the experiment. At the Public 4-Year and Private not for profit postsecondary institutions participating in the Second Chance Pell experiment, nearly 100 percent of the inmates who completed a FAFSA did, in fact, attend. Note that this observed disparity in attendance rates may reflect differences in the attractiveness of course offerings to potential students or merely the timing of inmates completing their FAFSAs.

As Tables 4 and 5 did above, Tables 6 and 7 below present descriptive statistics calculated combining the data from all participating postsecondary institutions and the measures recalculated separately for each of the three school types of postsecondary institutions participating in the experiment. Note that all the statistics in Tables 6 and 7 were calculated including only those incarcerated students who received an experimental Pell Grant award and thus include only individuals who were enrolled in at least one postsecondary academic course.

Table 6: Descriptive Statistics of Incarcerated Students Receiving a Pell Grant in the Second Chance Pell Experiment: 2016-2017

	All Schools	Public 4-Year	Public 2-Year	Private not for profit
	N=4,964	N=850	N=2,517	N=1,597
Average Pell Grant*	\$2,667	\$3,344	\$1,845	\$3,609
Percent of Second Chance Pell recipients also receiving non-Federal aid	52.7%	24.0%	48.3%	73.9%
Average non-Federal aid amount, if received	\$2,283	\$1,614	\$310	\$4,416
Average Number of Credits Attempted	16.9	15.9	16.1	18.7
Average Number of Credits Completed	14.9	15.1	15.0	14.6

*Note: the maximum Pell Grant award for the 2016-2017 award year was \$5,815.

Table 7: Descriptive Statistics of Incarcerated Students Receiving a Pell Grant in the Second Chance Pell Experiment: 2017-2018

	All Schools	Public 4-Year	Public 2-Year	Private not for profit
	N=6,750	N=1,364	N=3,171	N=2,215
Average Pell Grant*	\$3,398	\$4,084	\$2,184	\$4,714
Percent of Second Chance Pell recipients also receiving non-Federal aid	41.0%	33.4%	18.1%	69.0%
Average non-Federal aid amount, if received	\$2,801	\$1,339	\$378	\$3,865
Average Number of Credits Attempted	19.6	21.3	15.8	22.6
Average Number of Credits Completed	17.0	18.6	15.1	18.3

*Note: the maximum Pell Grant award was \$5,920 for the 2017-2018 award year.

Note that the average Pell Grant amounts in Tables 6 and 7 are considerably less than the maximum Pell Grant award for the given award years. This disparity may reflect less than full-time enrollment (See Figure 8) and/or relatively low cost of attendance (See Figures 5 and 7). The average Pell Grant award amount also varied considerably across school types. The average Pell Grant received by

incarcerated students enrolled at private not for profit postsecondary institutions was nearly double the average Pell Grant received by those enrolled at a public 2-Year postsecondary institutions.

We observed even starker differences in the non-Federal aid incarcerated students received across school types. While nearly three out of four incarcerated students attending a private not for profit postsecondary institution received non-Federal aid, just less than one quarter of those attending Public 4-Year institutions did. Furthermore, the average value of non-Federal awards received among incarcerated students attending private not for profit postsecondary institutions was more than twice that received at Public 4-Year colleges and more than ten times the average award at Public 2-Year institutions.

Measures of Experimental “Outcomes”

Because we are evaluating the first two years of the experiment, our outcomes assessment focused on short-term outcomes, such as the number of credits and credentials completed. As discussed earlier, the longer-term impact on the employment of participating students and their earnings after they return to their communities, as well as the impact on recidivism will require a longer-term evaluation of the experiment as well as access to data that schools and the Department are not currently able to access. The Department is exploring ways in which we could partner with other Federal agencies to identify which participants are earning income, what their annual income is, and whether or not the individual is receiving other social service benefits. We are also exploring ways to determine recidivism rates, which institutions and prisons have a difficult time tracking.

Average Credit Completion

While there were notable differences between school types in the dollar value of experimental Pell Grants received, as well as the percentage of students receiving non-Federal financial aid, and the dollar value of that non-Federal assistance, it should be noted that, as a general rule, the incarcerated students receiving Pell Grants during this experiment earned a high percentage of the credits they attempted. This was the case across all three school types. Incarcerated students participating in the Second Chance Pell experiment attempted an average of roughly 16 credits at public postsecondary institutions and roughly 18 credits at private not for profit schools, and successfully completed roughly 15 of those credits during the 2016-2017 award year. While the average number of credits attempted and completed were both slightly higher during the 2017-2018 award year, participants in the Second Chance Pell experiment continued to complete a high proportion of the postsecondary credits they attempted.

Assuming four credits per course, our findings translate into the average Second Chance Pell student attending either a four or two-year postsecondary institution enrolling in four courses during the 2016-2017 award year and failing to earn credit for a course one sixteenth of the time. Therefore, the average student would fail one course (4 credits) every four years (4 years x 4 courses per year x 4

credits per course = 64 credits attempted). Four divided by 64 reduces to 1 in 16 credits failed, which is equivalent to successfully completing 15 out of 16 credits attempted.

Table 8 provides additional insight into the enrollment intensity of the students participating in the Second Chance Pell experiment by disaggregating information not only by type of postsecondary institution but also by how many postsecondary credits incarcerated students attempted in 2016-2017. Note that a high percentage of the credits attempted by students made eligible for Pell Grants by the experiment were successfully completed regardless of the number of credits attempted or the type of postsecondary school. That said, completion rates generally increased with the number of credits students attempted and were higher at public than private not for profit postsecondary institutions. Note that schools participating in the experiment failed to report the number of credits attempted or completed for just over six percent of the students and therefore we do not have this information for those students.

Table 8: Average Pell Grants and Number of Credits Completed by Number of Credits Attempted and Type of Postsecondary Institution: 2016-2017**All Schools**

Credits Attempted	# of Students	Percent of Pell Grant Recipients	Avg Pell \$ Per Recipient	Avg Credits Completed	Credit Completion Percentage
1 – 6	643	13.0%	\$ 1,108	4.54	87.82%
7 – 12	1,257	25.5%	\$ 1,987	9.09	86.65%
13 – 18	1,090	22.1%	\$ 2,598	13.83	88.30%
19 – 24	925	18.7%	\$ 3,968	19.32	83.14%
> 24	707	14.3%	\$ 3,489	30.48	93.48%
Not reported*	342	6.3%	\$ 3,222		
Total	4,964	100.0%	\$ 2,672	14.90	88.11%

Public 4 Year

1 – 6	124	14.6%	\$ 1,160	4.44	86.28%
7 – 12	163	19.2%	\$ 2,186	9.17	87.58%
13 – 18	193	22.7%	\$ 3,334	15.53	95.66%
19 – 24	259	30.5%	\$ 4,706	21.49	96.61%
> 24	52	6.1%	\$ 5,084	25.15	95.27%
Not reported	59	6.9%	\$ 3,657		
Total	850	100.0%	\$ 3,344	15.06	94.48%

Public 2 Year

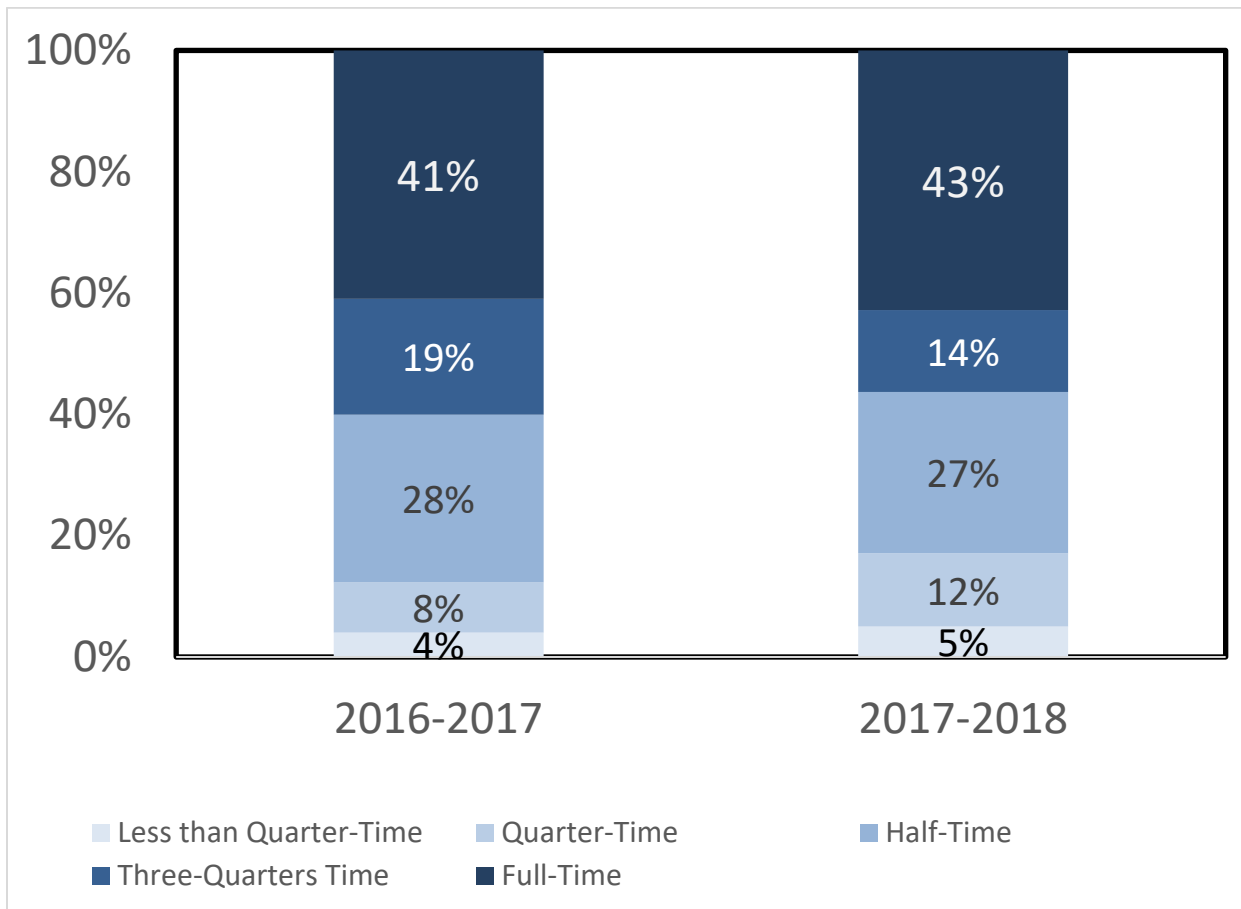
1 – 6	360	14.3%	\$ 1,036	4.97	93.91%
7 – 12	754	30.0%	\$ 1,706	9.21	89.94%
13 – 18	678	26.9%	\$ 2,162	14.23	91.12%
19 – 24	242	9.6%	\$ 1,237	20.38	93.59%
> 24	404	16.1%	\$ 2,086	32.96	96.63%
Not reported	79	3.1%	\$ 4,757		
Total	2,517	100.0%	\$ 1,845	15.03	93.28%

Private Not for Profit

1 – 6	159	10.1%	\$ 1,226	3.67	74.24%
7 – 12	340	21.7%	\$ 2,340	8.80	78.47%
13 – 18	219	14.0%	\$ 3,296	11.11	72.53%
19 – 24	424	27.1%	\$ 5,073	17.39	77.29%
> 24	251	16.0%	\$ 5,417	27.60	80.92%
Not reported	204	11.1%	\$ 2,377		
Total	1597	100.0%	\$ 3,597	14.58	77.95%

*Students attending schools that did not report the number of credits completed

Figure 8: Enrollment Status of Incarcerated Students Made Pell-Eligible by the Second Chance Pell Experiment (2016-2017 N= 4,575 2017-2018 N=5,383)

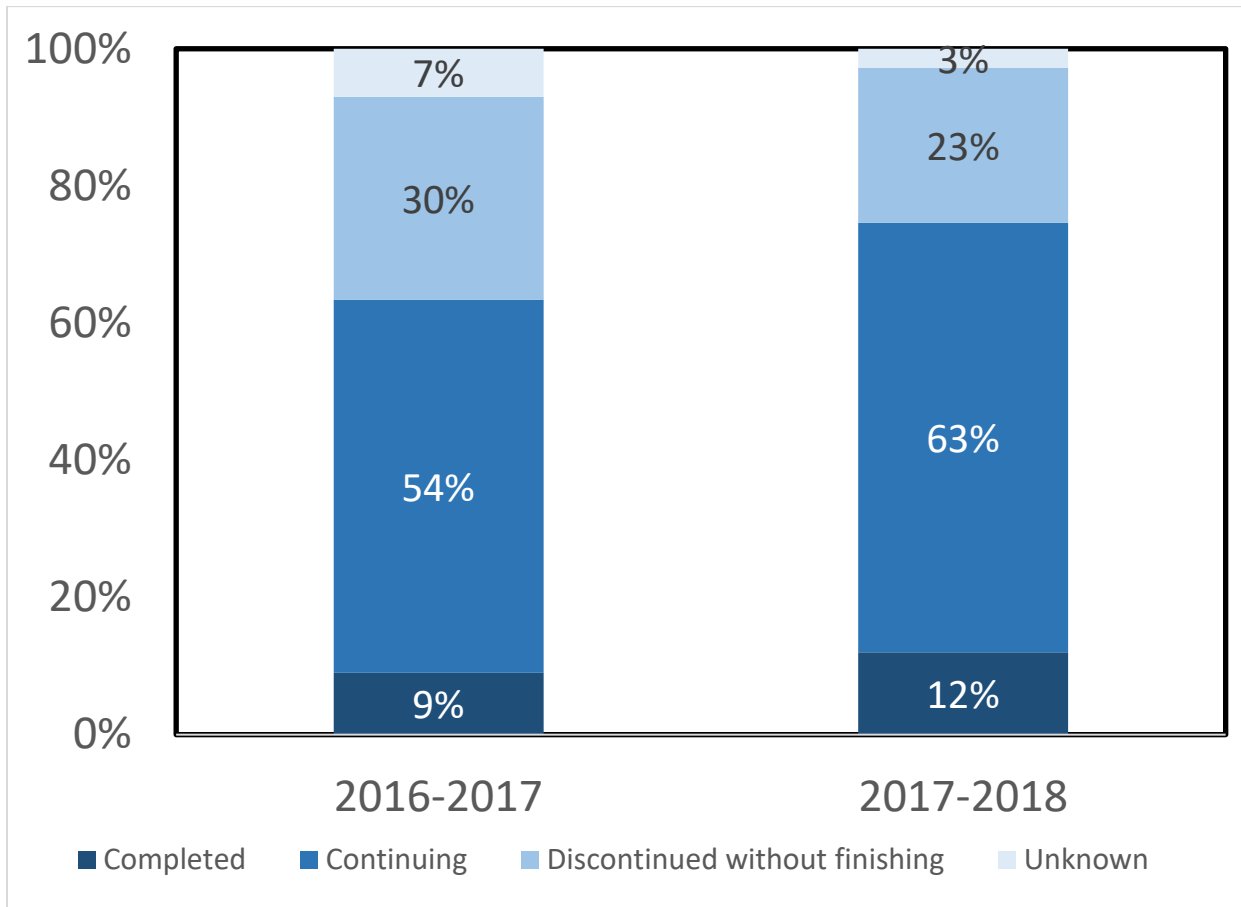


Postsecondary institutions participating in the Second Chance Pell experiment reported the enrollment status of every incarcerated student participating in the experiment at the beginning, and at the end of the 2016-2017 and 2017-2018 award years. Enrollment status at both ends of the award year was characterized as falling into one of the following categories (as provided in Federal Regulation 34 CFR 668.2): less than quarter-time; quarter-time; half-time; three-quarters-time; or full-time. Figure 8 presents the highest enrollment level recorded for incarcerated students receiving experimental Pell Grants during the indicated award year. Figure 8 reports that a small percentage of students’ highest enrollment status was less than one quarter time. The distribution of enrollment statuses reported in Figure 8 reveals that nearly all the incarcerated student participants in the experiment were enrolled at least half-time and nearly half were enrolled full-time during both award years being analyzed here.

Participating postsecondary institutions also reported each incarcerated student’s progress toward their academic degree at the end of each award year. This educational “status” measure reflected the postsecondary institutions’ knowledge of the incarcerated student’s situation and plans; specifically, whether students had completed their program of study, planned to continue, had left without

completing, or the participating postsecondary institution staff who reported the data did not know the student’s status. Figure 9 provides the distribution of each award year’s Pell Grant recipients across these four categories.

Figure 9: Postsecondary Educational Status at the end of the 2016-2017 and 2017-2018 Award Years.



Note the relatively low percentage (9 percent) of students completing their program during the initial 2016-2017 award year (9 percent). While at first glance this may appear troubling, keep in mind that the data being analyzed here measure student progress toward their academic degree in only a single academic year for participating postsecondary institutions where most academic programs (by school type descriptions) require at least 2 years to complete (i.e., 2-year public postsecondary institutions). Nearly two-thirds of the incarcerated students receiving an experimental Pell Grant had completed (9 percent) or were continuing their program of study (54 percent) at the end of the 2016-2017 award year. The percentage of 2017-2018 Pell Grant recipients completing (12 percent) and continuing (63 percent) both increased during the second year of the experiment. This increase in the second year is at least partially due to a subset of the 2016-2017 Pell Grants recipients progressing through their programs.

When completing a FAFSA, all applicants – not just the incarcerated individuals participating in the Second Chance Pell Experiment – are asked to identify the type of postsecondary credential they are

pursing. Figure 10 presents the responses of 2016-2017 participants in this experiment. Figure 11 presents this information for the 2017-2018 award year. Note that relatively few individual students participating in the experiment are seeking a “Certificate or Diploma (that can be completed in) Less Than 2 Yrs.” Note further that nearly all the participants in the experiment seeking this type of postsecondary credential were attending a public 2 Year institution.

Finally, postsecondary institutions reported the incarceration status, at the end of the award year, for every student participating in the Second Chance Pell experiment. Incarceration status was characterized by three mutually exclusive categories: still incarcerated, released, or unknown by the participating postsecondary institution. Figure 12 presents the distribution of the students across these three categories for both the 2016-2017 and 2017-2018 award years.

Figure 10: Type of Degree/Certificate Sought by Student Participating in the Second Chance Pell Experiment During the 2016-2017 Award Year. (N =4,866)

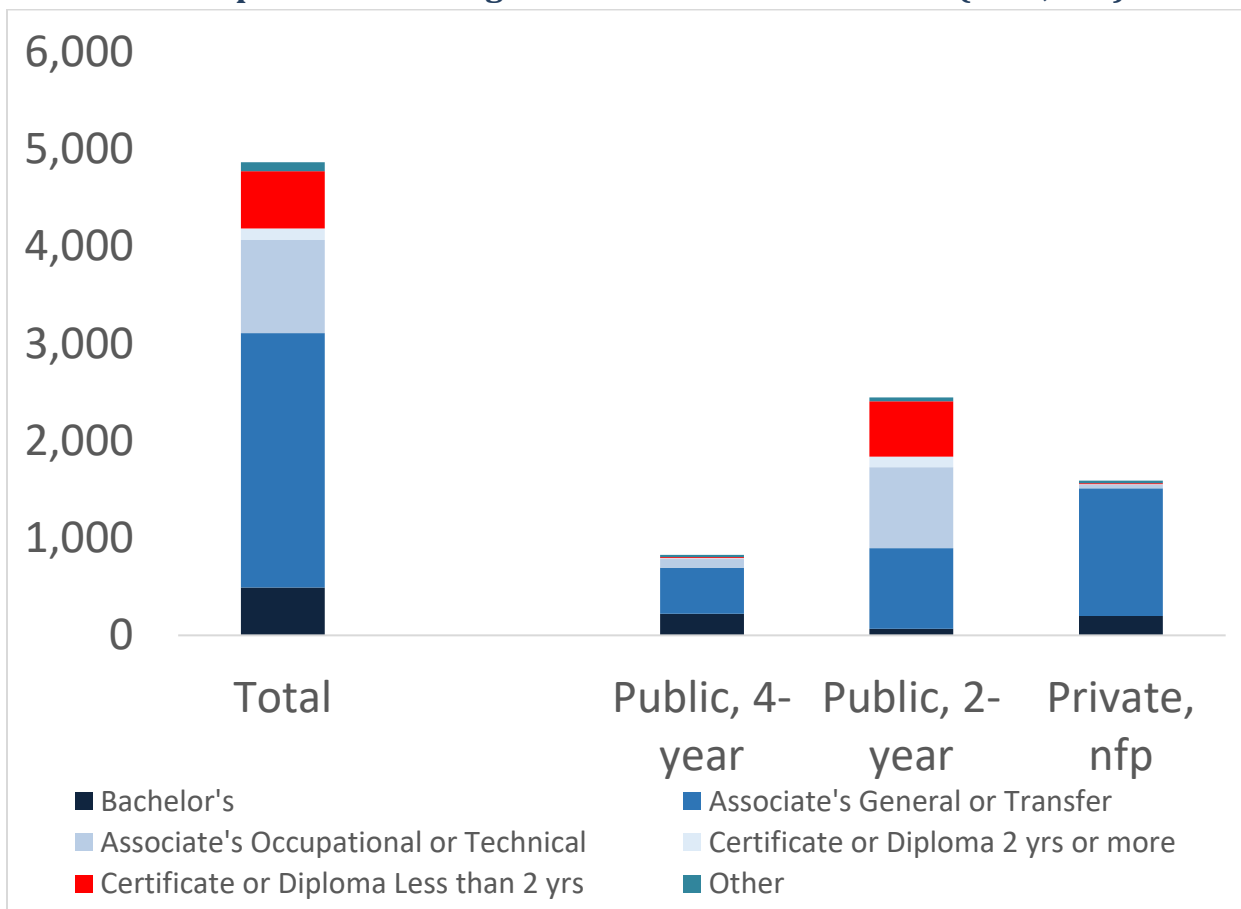


Figure 11: Type of Degree/Certificate Sought by Student Participating in the Second Chance Pell Experiment During the 2017-2018 Award Year (N = 5,614)

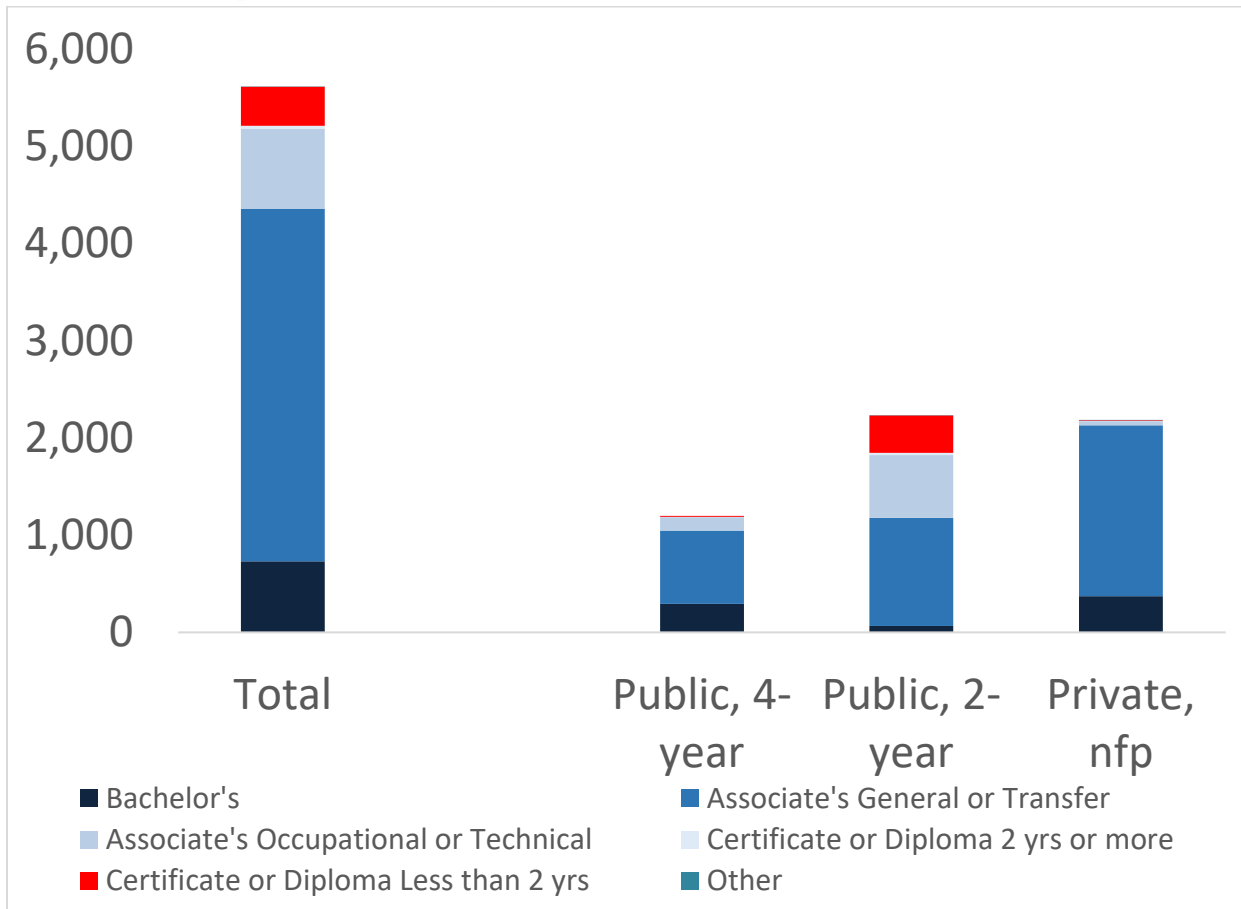
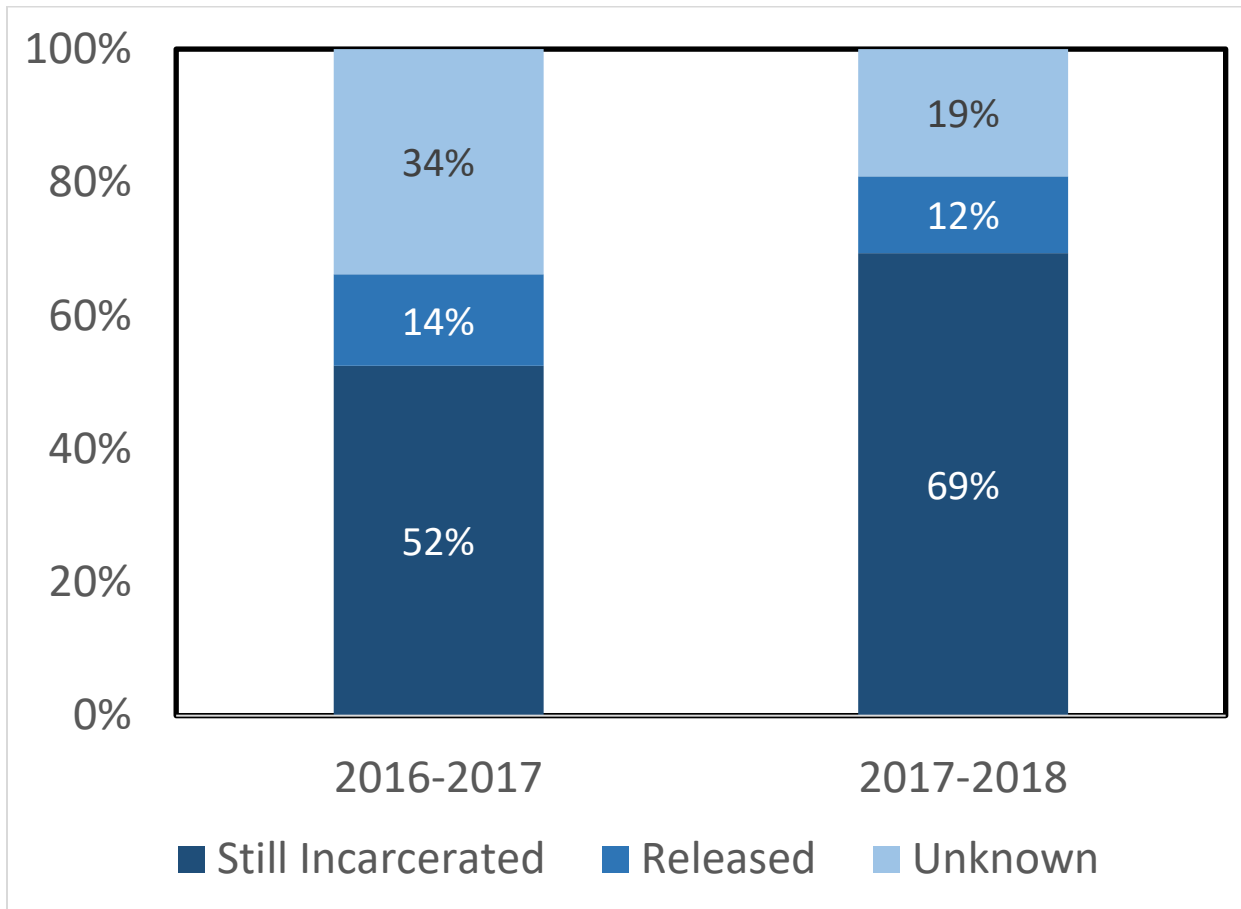


Figure 12: Student Incarceration Status at the end of the 2016-2017 and 2017-2018 Award Years. (2016-2017 N = 4,008) (2017-2018 N=4,242)



In 2016-2017, slightly more than half (52 percent) of the participating students remained incarcerated. Roughly one in seven (14 percent) were known to the postsecondary institution to have been released by the correctional institution. Note that the status of a third (34 percent) of the students was unknown to the participating postsecondary institution. Note the relatively high “unknown” percentage for the initial 2016-2017 award year compared to the subsequent 2017-2018 award year.

Results Not Yet Observed

The data analyzed in this report reflect what happened during the 2016-2017 and 2017-2018 awards year. As 2016-2017 was the first academic year that participating postsecondary institutions implemented the Second Chance Pell experiment, the incarcerated students made experimentally eligible for Pell Grants have had a limited amount of time to prepare themselves for the postsecondary educational opportunities afforded by the experiment, *e.g.*, complete the requisite secondary education and select a postsecondary course of study. Furthermore, many of the potentially positive or negative outcomes of extending Pell Grant eligibility to incarcerated students, simply have not had enough time to happen.

The data collected from subsequent award years may be able to address future postsecondary outcomes that occur during the duration of the experiment. In addition, the Department of Education

has the capability to monitor the future postsecondary enrollment, Title IV aid receipt, and the borrowing and repayment of any Federal educational loans of the students who have or will participate in the experiment while incarcerated after their release. If statutory or policy makers are interested in the effect of experimental Pell Grant eligibility on the recidivism or future labor market outcomes of participating incarcerated students, they will not only need to wait for such outcomes to occur, but will also need to allocate additional funds to analyze those outcomes, and likely designate an applicable Federal agency to complete that type of follow up and further analysis. Such analyses are simply beyond the capacity of the resources currently being devoted to the ESI at the Department of Education.

Preliminary Findings

A fundamental purpose of the Department of Education's ESI efforts is to uncover unanticipated issues stemming from a proposed statutory or policy change. The Department of Education suspected that participating postsecondary institutions would encounter incarcerated individuals having difficulty with completing their initial FAFSA and documenting their information when incarcerated applicants were selected for verification. The Department of Education's successful efforts in terms of simplifying and automating the general application for Federal student aid has created some specific obstacles for inmates, who often have restricted access to the web and strained relationships with the family members that the typical verification process presumes ready cooperation from. However, while FSA provided some alternatives for some of the documentation and application processes necessary for Title IV Federal student aid programs (see ESI web-based resources⁷), no massive intervention was adopted in this regard. This was done to allow participating postsecondary institutions the opportunity to report for the experiment difficulties to either confirm FSA's assumptions, or to identify areas that statutory and policy makers would need to address if a statutory or policy change was adopted to allow incarcerated students to access Federal Pell Grants.

When incarcerated applicants had filed a FAFSA with the Department of Education prior to their incarceration, a special resolution was required to enable these students to add a new school code (the ESI participating school) to their FAFSA. Non-incarcerated applicants would be able to add a school code by either submitting a correction online, using a paper FAFSA, or by providing the assigned "Data Release Number (DRN)" to the "new" school who would then be able to add their school code on the student's behalf. Normally these applicants would obtain their DRN number from a copy of their Student Aid Report (SAR) which is available to them via mail or online. However, the "normal" processes for adding a school code proved problematic for incarcerated students given their limited access to phones or the internet. To address this immediate barrier within the experiment, the Department developed a temporary workaround allowing schools to submit a statement from the student to a Department official requesting that the school code be added to the student's FAFSA. On

⁷ <https://experimentalsites.ed.gov/exp/pdf/SecondChancePellFAQ.pdf>

a larger national scale, the Department would need to develop more formal policy and procedures with schools.

Another challenge for incarcerated applicants involved the Selective Service registration process. One of the requirements for Federal student aid eligibility is for males to have registered for selective service when they were between the ages of 18-26 years old. Male FAFSA applicants who failed to register for selective service have two options: (1) if they are still between the ages of 18 and 26 years old when completing the FAFSA, they may ask the Department of Education to send their information to the Selective Service so that they can be registered; and (2) if they are older than 26 years old, they can write to the Selective Service explaining their failure to register and submit the response from Selective Service to the school's financial aid administrator as evidence that the FAFSA applicant did not "knowingly and willfully" fail to register with Selective Service. Obtaining documentation that shows that the FAFSA applicant did not "knowingly and willfully" fail to register for selective service has proved difficult for incarcerated individuals.

Another issue unique to correctional settings concerns program interruptions that occur due to correctional facility security breaches and disciplinary "lockdowns". During such events, academic programs may be interrupted for extended periods of time, affecting the number of weeks of instructions which are currently prescribed by Federal regulations. The degree to which regulation and policy guidance regarding such interruptions within correctional settings warrants attention.

Several participating postsecondary institutions suggested granting greater authority to consider incarcerated students who would otherwise be considered dependent students for FAFSA purposes (requiring parent information), to be considered independent by the condition of their incarceration. This approach could remove administrative barriers to postsecondary education for incarcerated students who may be isolated or have limited contact with their families as a result of their incarceration.

Lastly, schools participating in the Second Chance Pell experiment commonly cited verification of prisoner FAFSA information as an unexpectedly challenging aspect of participating in the experiment. Several postsecondary institutions participating in the experiment pointed out the difficulty they experienced verifying the information incarcerated applicants provided on their FAFSA. It is important to note that one of the prominent FAFSA data elements subject to verification is income. Incarcerated individuals often receive extremely modest wages for work they perform at the correctional facility. This small dollar amount – being insufficient to house, clothe, and feed an individual – even if needing corrections for accuracy compared to what was reported on the FAFSA, likely will not result in a change in the students' EFC or change the student's Pell Grant eligibility. To avoid these problems, policymakers could consider removing requirements for verifying the income of incarcerated students or modify those requirements to address the challenges of providing the required documentation for an incarcerated student.

Next Steps

Experiment Moving Forward

As the Department of Education monitored the expenditures and other activities of participating postsecondary institutions, it sought and received the required clearance to collect information to evaluate this initiative, analyzed those data, and authored this report, the Second Chance Pell experiment continued. As of the writing of this report, the third (2018-2019) award year has just ended.

2018-2019 and Beyond

Student level data from the 2018-2019 award year was collected during the fall of 2019, after the postsecondary institutions participating in the experiment have had time to reconcile (submit all of the corrections/adjustments) aid awarded to all Title IV participants at their postsecondary institutions (not just incarcerated students under this experiment). Participating postsecondary institutions again completed an annual survey during the fall of 2019. For most postsecondary institutions participating in the Second Chance Pell experiment, the 2018-2019 award year will be the third year of reporting data.

FSA continued the Second Chance Pell experiment through the 2019-2020 award year and has invited a new cohort of institutions to participate in the experiment during the 2020-2021 award year. During the fall of 2020, participating schools will report on the 2019-2020 award year. This will provide information on up to four years of Pell Grant supported postsecondary education for students incarcerated in Federal or State penal institutions under this experiment.

Conclusion

FSA concludes this report with a summary of its analysis to date and a discussion of the implications of our findings for the experiment going forward.

Summary

- More than half of the postsecondary institutions participating in the Second Chance Pell experiment are Public 2-Year postsecondary institutions.
- There were no proprietary schools included in the first cohort of participating institutions, and there were few private, non-profit institutions, though one large private, non-profit served the largest number of students in the experiment.
- FSA's survey of postsecondary institutions participating in the Second Chance Pell experiment revealed that most postsecondary institutions had provided postsecondary education to incarcerated students prior to the experiment.
- The survey responses of postsecondary institutions participating in the Second Chance Pell experiments also indicated that incarcerated individuals (with the help of postsecondary institution staff) had to overcome several challenges in completing their initial application for

aid (the FAFSA), verifying selected information on the FAFSA if they were selected for verification by the Department, and, in some cases, explaining why they had not registered for Selective Service.

- Analysis of individual student data found that approximately three quarters of the incarcerated students receiving a Pell Grant to attend courses provided by a private, not-for-profit postsecondary institution also received additional non-Federal financial aid.
- Recipients of Second Chance Pell Grants successfully completed a high percentage of the credits they attempted. This was the case at all types of postsecondary institutions participating in the experiment.

Implications for the Experiment

Our findings have two primary implications for the Second Chance Pell experiment going forward.

First, it is too early to draw conclusions regarding this experiment. The data analyzed here measure at most only the initial two years of extending Pell Grant eligibility to incarcerated students. It remains to be seen if students participating in the experiment maintain their academic success in terms of earning nearly all the credits they attempt. Subsequent years of data will allow FSA to measure the academic progress Pell recipients make across multiple award years. The analysis of progression toward a postsecondary credential across multiple award years will be limited to students who remain incarcerated (at a correctional institution allowing a postsecondary institution participating in this experiment to offer Pell Grant supported courses to incarcerated individuals).

Second, the Department of Education is relying heavily on the postsecondary institutions' participating in the experiment to supply data for the evaluation. While postsecondary institutions have better data regarding students' educational status than they do regarding students' incarceration status, in both cases once a student is released or transferred to a different facility, institutions are unable to follow those students and accurately report on their status. The Department of Education is exploring new ways to help follow the progress of these students but will likely need to partner with other agencies to collect robust data to assess longer-term outcomes.

Appendix A – Second Chance Pell experiment Program Participation Agreement (PPA) Amendment

U.S. DEPARTMENT OF EDUCATION FEDERAL STUDENT AID

AMENDMENT TO TITLE IV PROGRAM PARTICIPATION AGREEMENT FOR PARTICIPATION IN THE PELL FOR STUDENTS WHO ARE INCARCERATED EXPERIMENT UNDER THE EXPERIMENTAL SITES INITIATIVE

Name of Institution:

Address:

Office of Postsecondary Education Identification Number (OPEID):

The postsecondary educational institution listed above, referred to hereafter as the “Institution,” and the United States Department of Education, referred to hereafter as the “Department,” agree that the Institution, pursuant to Section 487A(b) of the Higher Education Act of 1965, as amended (HEA), is approved to participate in the “Pell For Students Who Are Incarcerated” experiment (also known as “Second Chance Pell”) under the Experimental Sites Initiative (ESI), as described in this amendment to the Institution’s Program Participation Agreement (PPA).

While participating in this experiment, the Institution is exempt from certain provision(s) of the HEA and the applicable regulations to the extent described below, and the Institution’s agreement to meet the conditions in the experiment is a material basis for the Department’s approval. Upon execution by both the Institution and the Department, this agreement becomes an amendment to the Institution’s PPA.

This experiment allows the Institution to provide Federal Pell Grant funding to otherwise eligible students who are incarcerated in Federal or State penal institutions and who are eligible for release into the community, particularly those who are likely to be released within five years of their enrollment in the Institution’s educational program. The Institution agrees to not exceed any limitations imposed by the Department regarding the number of students enrolled under this experiment and/or the total amount of Federal Pell Grant expenditures made to such students.

Waivers

By agreeing to the alternative procedures and requirements for this experiment, the Institution will be exempt from the following statutory and regulatory provisions:

- Section 401(b)(6) of the HEA; and 34 CFR 668.32(c)(2)(ii), which provide that a student who is incarcerated in a Federal or State penal institution is not eligible to receive Federal Pell Grant funding.

Note: The waiver described in this notice does not apply to individuals subject to an involuntary civil commitment upon completion of a period of incarceration for a forcible or nonforcible sexual offense. Such individuals are not, under the law, eligible for any of the Title IV student aid programs.

Partnership with Federal or State Correctional Facilities

The Institution must partner with one or more Federal or State correctional facilities to offer one or more Title IV HEA eligible educational programs to incarcerated students, and report to the Department the name of such facility(ies). The Institution must work with its partnering correctional facility(ies) to:

- Identify otherwise eligible students and encourage these students to submit a Free Application for Federal Student Aid (FAFSA).
- Submit to the Department an action plan for providing academic counseling, career guidance, and transition services, to the incarcerated students who will receive Pell Grant funding through this experiment to support successful reentry into the community.
- Ensure that Federal Pell Grant funds made available to students under this experiment supplement, and not supplant, existing investments in postsecondary prison-based education programs by either the institution, the correctional facility, or public sources (e.g., State or local funding).

Program Eligibility

The postsecondary educational program(s) offered to incarcerated students under this experiment must meet all Title IV HEA program eligibility requirements, including that the program be credit-bearing and lead to a certificate or degree awarded by the Institution. No more than one full year of remedial coursework is allowed. If not already approved for Title IV participation by the Department the institution must obtain approval for each program offered under this experiment before awarding Title IV funds to incarcerated students who are enrolled in that program.

Additionally, the Institution must ensure that it:

- Disburses Federal Pell Grant funds only to otherwise eligible students who will eventually be eligible for release from the correctional facility, while giving priority to those who are likely to be released within five years of enrollment in the educational program in cases of limited funding opportunities and/or enrollment limitation.
- Only enrolls students in postsecondary educational and training programs that prepare them for high-demand occupations from which they are not legally barred from entering due to restrictions on formerly incarcerated individuals obtaining any necessary licenses or certifications for those occupations.
- Discloses to interested students and to the Department information about any portions of the educational program that, by design, cannot be completed while students are incarcerated, as well as the options available for students to complete any remaining program requirements post-release.
- As appropriate, offers students the opportunity to continue their enrollment in the academic program if the student is released from incarceration prior to program completion.
- Informs students of the academic options and financial aid availability if they are notable to complete the academic program while incarcerated.
 - Academic options may include whether the students can continue in the program after release, transfer credits earned in the program to another program offered by the Institution, or transfer credits earned in the program to another postsecondary institution.

- Financial aid availability may include information on student aid and eligible financial aid programs, including annual and aggregate aid limits.

Evaluation: This experiment will be evaluated using information provided to the Department by the Institution, as well as any other information available to the Department. The Department seeks to evaluate:

- How offering Federal Pell Grant funds to otherwise eligible individuals who are incarcerated in Federal or State penal institutions impacts participation of incarcerated students in educational programs.
- How providing Federal Pell Grant funds to otherwise eligible individuals incarcerated in Federal or State penal institutions influences academic outcomes and life outcomes after their release from prison.
- Whether providing Federal Pell Grant funds to otherwise eligible individuals incarcerated in Federal or State penal institutions creates any challenges or obstacles to the Institution's administration of the Title IV HEA programs.

Reporting Requirements: The Institution will be required to provide the Department information about the participating students who submit a Free Application for Federal Student Aid (FAFSA) for enrollment in programs offered by the Institution that is included in the experiment.

The Institution will be required to submit an annual report about its implementation and administration of the experiment, and results. The Institution may be required to provide the Department with information such as:

- Courses and programs offered by the institution.
- Courses and programs in which students enrolled
- Courses and programs students completed
- Numbers and types of degrees and certificates awarded
- Partnerships with the correctional facilities.

- Challenges in providing programs and courses in the prison settings, and how these challenges were addressed.
- Any other information requested by the Department.

In addition to complying with reporting requirements, the Institution will be required to participate, if requested, in an outcome evaluation of the experiment. The Department will provide the Institution with a listing of the specific information that must be collected, reported, and maintained.

Termination of the Experiment

The Department has the right to terminate at any time the Institution's participation in the experiment described in this PPA amendment. If the Department terminates the experiment, the Department will notify the Institution in writing of the decision to terminate.

An Institution has the right to terminate participation in the experiment described in this Amendment. If the Institution terminates its participation in the experiment, it must notify the Department in writing of its decision to terminate its participation in the experiment, and the Department will acknowledge receipt of the Institution's notice in writing. The effective date of the termination is the date the Institution receives the Department's written notice or acknowledgement, as the case may be, unless the parties establish a different date. Written communication may be made by email, US mail or other service, or fax transmission.

If the Institution's participation in the experiment is terminated, the Institution must comply with all reporting requirements relating to the experiment for the periods during which the experiment was in effect. Beginning with the effective date of the termination, the Institution must comply with all statutory and regulatory provisions from which it was exempted from under this PPA amendment.

Second Chance Pell Experiment

IN WITNESS WHEREOF

The parties hereto have caused this Program Participation Amendment to be executed by their duly authorized representatives.

Signature of the Institution's Chief Executive Officer

Date

Print Name and Title

For the U.S. Department of Education

Date

Print Name and Title