

Revised Second Chance Pell Experiment

Compliance with Milestones Checklist

This milestone checklist is designed to assist institutions with transitioning programs under the revised Second Chance Pell (SCP) experiment to the Prison Education Program (PEP) provisions. The Program Participation Agreement (PPA) amendment for the revised SCP experiment outlines the specific milestones that need to be completed each award year of the experiment. Milestone 1 must be completed by the end of the 2023-24 award year. Milestones 2 - 14 are required during the 2024-25 award year. Milestone 15 is the submission of the PEP(s) for approval and must be completed before January 1, 2026. This allows the School Participation Teams to process the applications before the experiment ends on June 30, 2026.

After Milestone 1 is complete, an institution may complete any of the other milestones early and in any order. An institution is not required to submit proof of completion of each milestone to the Department or receive permission from the Department to move to the next milestone. However, the institution must keep a record of the milestone completion and will be required to report the status of the milestone completion in the Second Chance Pell annual survey that participating institutions must complete in the Fall of each year.

Programs transitioning to PEP

Once an institution has completed the milestones and is ready to submit the experiment program(s) for approval under the PEP provisions, it may submit the program(s) for approval consideration and does not need to wait until January 1, 2026. As the PEP provisions apply to single programs, it is possible that schools with multiple programs will have some programs transition before others. After all programs an institution wishes to transition to a PEP are approved, the institution's participation in the experiment will end and it will be able to operate its program(s) under the PEP provisions.

Programs not transitioning to PEP

If a program **will not be transitioned to a PEP**, the individual milestones do not apply. However, as part of Milestone 13 the institution must have a plan for students enrolled in the program which must include the ability of all students to either finish the program or transfer to another eligible PEP prior to the end of the experiment. If the program not converting to PEP will continue beyond June 30, 2026, it will become ineligible for Pell.

As a reminder, the revised SCP experiment will end on June 30, 2026. In order for a program offered under the experiment to remain eligible for Title IV aid, it must be converted to an approved PEP by that date.

Revised Second Chance Pell Experiment

Compliance with Milestones

2023-24 Milestone

Milestone 1 – Signed Written Agreement

By June 30, 2024, the institution must have a signed written agreement with at least one correctional facility for at least one program offering a prison education program (PEP). The agreement must include, at a minimum, the oversight entity's permission to offer the PEP at the correctional facility, and assurances that the oversight entity will provide the following: the best interest determination for the proposed program within the first 2 years of the program's approval, and transfer and release data for students enrolled in the approved program(s) to the institution during the existence of the PEP.

The institution is in compliance with this milestone

Date of compliance:

Please keep a copy of the agreement on file to be included as an attachment when submitting the PEP Application. A copy of this agreement must be included as supporting documentation when completing the E-App (labeled as Attachment 1). By January 1, 2026, *every program at every correctional facility must have such written agreement*. The institution will be asked for more information on methodology and benchmarks for each PEP in Milestones 9 and 10.

2024-25 Milestones (each milestone must be completed for every PEP)

By June 30, 2025, the Institution must have completed several specific steps toward submission of its PEP application(s) to the Department. Specifically, by June 30, 2025, the institution must be able to attest (and demonstrate if requested) that it has completed the following milestones. Note that since there are several requirements that must occur during the 2024-25 award year, we have separated the requirements into several individual milestones.

Milestone 2 – Name and Description of PEP

Determined the programs(s) to be offered under the new provisions. The Institution must be able to provide a description of the proposed program(s), including the educational credential offered (degree level or certificate) and the field of study as required by [34 CFR 668.238\(b\)\(1\)](#).

Name and CIP code of Program one and description of program:

Name and CIP code of Program two and description of program (if applicable):

Name and CIP of Program three and description of program (if applicable):

If more than three programs, please provide the name, CIP code and description of each program.

The institution is in compliance with this milestone

Date of compliance:

Please keep this information on file as your institution will need this information when it is ready to submit the PEP(s) for approval. Please note that the institution will be required to submit a separate PEP application for each program.

Milestone 3 – Partner Entities (if applicable)

If the institution will be partnering with other entities that will be providing any part of a PEP, it must have a written arrangement to comply with [34 CFR 668.5](#). Note: This milestone only applies if your institution is partnering with other entities that will be providing any part of the PEP.

The institution is in compliance with this milestone

Date of compliance:

The institution will not partner with other entities to provide any part of the PEP and this milestone is not applicable.

Please keep this information on file *for each PEP that your institution will submit for approval*. If the institution enters into a Written Arrangement for any PEP, it will be asked to provide a copy of the written arrangement and include it as supporting documentation *for each PEP* when completing the E-App (labeled as Attachment 4).

Milestone 4 – Student Admission Policies

An explanation of the admission policy of the PEP, including any restrictions regarding admission of students such as those based on Pell eligibility, any requirements by the oversight entity, programs leading to licensure or employment for a specific job or occupation in the state if such job or occupation typically involves prohibitions on the licensure or employment ([34 CFR 668.236\(a\)\(8\)](#)), or transfer of credits to another institution ([34 CFR 668.236\(a\)\(4\)](#)).

The institution is in compliance with this milestone

Date of compliance:

Please keep this information on file *for each PEP that your institution will submit for approval*. Your institution will be required to provide an explanation of the admission policy for each PEP on the PEP Application Form.

Milestone 5 – Types of services to be offered to admitted students

Information about the types of services (to be) offered to admitted students, including orientation, tutoring, academic and career advising, and reentry counseling to support successful reentry into the community. Note: If reentry counseling is provided by a community-based organization (CBO) that has partnered with the PEP, institution, or correctional facility to provide reentry services, provide the name of the CBO, background information on the CBO, and information about the types of services that the CBO offers as required by [34 CFR 668.238\(b\)\(5\)](#).

The institution is in compliance with this milestone

Date of compliance:

Please keep this information on file for *each PEP* that your institution will submit for approval. Your institution will be required to provide this information for each PEP when completing the PEP Application Form. In addition, if your institution partners with a CBO, a one-page document that contains the name of the CBO, background information on the CBO, and information about the types of services that the CBO offers must be included as supporting documentation for each PEP when completing the E-App (labeled as Attachment 5).

Milestone 6 – Transferability of Credits

The institution must be able to certify that the credits in the proposed PEP can transfer to another eligible public or nonprofit institution in the state where the correctional facility is located (for non-federal facilities) or in the state(s) where most students will reside upon release (for federal facilities). In addition, the institution must identify at least one eligible public or private nonprofit institution that the credits can be transferred to meet this requirement. If the institution has an articulation agreement with more than one institution, it must provide a listing of all institutions with which the institution has an articulation agreement.

The institution is in compliance with this milestone

Date of compliance:

Please keep this information on file. Your institution will be required to certify this information on the PEP Application Form *for each PEP*. In addition, if your institution has articulation agreements with more than one institution, a listing of all institutions with which the institution has an articulation agreement must be included as supporting documentation *for each PEP* when completing the E-App (labeled as Attachment 6).

Milestone 7 – Program Meets Licensure Requirements (if applicable)

If the PEP is designed for professional licensure or certification, the institution must be able to certify that the PEP satisfies any applicable educational requirements for professional licensure or certification in the state where the correctional facility is located (for non-federal facilities) or in the state(s) where most incarcerated individuals will reside upon release (for federal facilities).

The institution is in compliance with this milestone

Date of compliance:

This milestone is not applicable because the PEP program is not designed for professional licensure or certification.

Your institution will be required to certify this information on the PEP Application Form *for each PEP it plans to submit for approval*.

Milestone 8 – Licensure of Employment in Profession Not Prohibited

Certification that the institution does not enroll a student in a PEP that is designed to lead to licensure or employment for a specific job or occupation in the state where the correctional facility is located (for non-federal facilities) or in the state(s) where most incarcerated individuals will reside upon

release (for federal facilities), if such job or occupation typically involves prohibitions on the licensure or employment of formerly incarcerated individuals.

The institution is in compliance with this milestone

Date of compliance:

Your institution will be required to certify this information on the PEP Application Form *for each PEP it plans to submit for approval.*

Milestone 9 - Initial Oversight Entity Approval of PEP

Received approval from the oversight entity to offer the program(s) at the correctional facility. The institution must provide a summary of how the oversight entity *initially approved* the PEP. The summary must include the methodology, including thresholds, benchmarks, standards, metric, data, and other information and how the oversight entity collected and used the information to approve the PEP.

The institution is in compliance with this milestone

Date of compliance:

The institution will be required to include this information (for both Milestone 9 and 10) as supporting documentation *for each PEP* when completing the E-App (labeled as Attachment 8).

Milestone 10 – Best Interest of Students

Within two years of initial approval of the PEP, the oversight entity will be required to conduct a best interest determination which includes an assessment of the required items under [34 CFR 668.241\(a\)\(1\)](#) and optional assessment of items under [34 CFR 668.241\(a\)\(2\)](#). The institution must develop a summary (no more than a paragraph) about how the oversight entity *plans to assess* each of the required items under [34 CFR 668.241\(a\)\(1\)](#). *Note that this not the actual assessment, just the steps that the oversight entity plans to take to be ready to evaluate the required items in two years.*

The institution is in compliance with this milestone

Date of compliance:

The institution will be required to include this information (for both Milestone 9 and 10) as supporting documentation *for each PEP* when completing the E-App (labeled as Attachment 8).

Milestone 11 – Accreditor Approval of PEP

The institution must receive accreditor approval for the first PEP offered at the first two additional locations. The approval documentation must indicate that the accrediting agency or state approval agency has evaluated the PEP and has included the PEP in the institution's grant of accreditation or approval as required by [34 CFR 668.237\(b\)\(1\)](#). For second or subsequent PEPs beyond the first PEP at the first to additional locations, the approval documentation must only indicate that the PEP meets

the requirements of the institution's accrediting agency or state approval agency as required by [34 CFR 668.237\(a\)](#).

The institution has received accreditor approval *for each PEP* as applicable and is in compliance with this milestone

Date of compliance:

The institution will be required to include the appropriate accreditor approval documentation as supporting documentation when completing the E-App *for each PEP* (labeled as Attachment 2).

Milestone 12 – Approval of Correctional Facility where PEP is Offered as an Additional Location

The institution must receive accreditor and state approval as applicable to offer the PEP at the Correctional Facility. For this purpose, the institution should refer to general guidance for approval of additional locations. The Correctional Facility must be legally authorized. The school must receive approval from the accreditor that the new location is included in the school's accredited status, and authorization from the state in which the additional site is physically located.

The institution has received accreditor and state approval as applicable to add *each Correctional Facility where a PEP is offered* as an additional location and is in compliance with this milestone

Date of compliance:

The institution will be required to include the appropriate approval documentation when completing the E-App *for each PEP* (labeled as Attachment 2).

Milestone 13 – Provide Plan for all Programs Offered under the Experiment

Provide a status of all programs currently offered under the experiment and the date on which those programs will be reported to the Department. If the Institution plans to offer programs beyond the first program at the first two additional locations, it will be required to report the program(s) as outlined in [34 CFR 600.21\(a\)](#). The Institution must prepare all programs offered under the experiment, that it plans to continue after the experiment ends, to be in compliance with the new PEP provisions as outlined in [34 CFR 668.238\(c\)](#). Any program beyond the first program at the first two additional locations must be reported to the Department prior to June 30, 2026, or students attending those programs will not be eligible for Pell Grants after the conclusion of the experiment.

Program One: Provide the name of the first program and whether the institution plans to convert the experiment program for approval as a PEP. Provide the following information for each program: The name of the program, whether it will be converted to PEP; if the program will be exactly the same as the program under the experiment (same credential, etc.); if the PEP will not be the same as the program under the experiment, provide an explanation of the differences and the plan for students enrolled in the experiment program; if the program will not be converted to PEP, please include the plan for students enrolled in the experiment program (will currently enrolled students be able to finish program prior to June 30, 2026 or will the institution transfer students to a similar PEP):

Program Two: Provide the name of the second program and whether the institution plans to convert the experiment program for approval as a PEP. Provide the following information for each program: The name of the program, whether it will be converted to PEP; if the program will be exactly the same as the program under the experiment (same credential, etc.); if the PEP will not be the same as the program under the experiment, provide an explanation of the differences and the plan for students enrolled in the experiment program; if the program will not be converted to PEP, please include the plan for students enrolled in the experiment program (will currently enrolled students be able to finish program prior to June 30, 2026 or will the institution transfer students to a similar PEP):

Program Three: Provide the name of the third program and whether the institution plans to convert the experiment program for approval as a PEP. Provide the following information for each program: The name of the program, whether it will be converted to PEP; if the program will be exactly the same as the program under the experiment (same credential, etc.); if the PEP will not be the same as the program under the experiment, provide an explanation of the differences and the plan for students enrolled in the experiment program; if the program will not be converted to PEP, please include the plan for students enrolled in the experiment program (will currently enrolled students be able to finish program prior to June 30, 2026 or will the institution transfer students to a similar PEP):

If the institution has more than three programs under the experiment, please provide the information above for each program (include separate sheets if necessary):

The institution is in compliance with this milestone

Date of compliance:

Please keep this information on file. The institution will be required to report this information on the annual survey.

Milestone 14 – Date the Institution Plans to Submit PEP Application to the Department

Inform the Department of the date on which it plans to submit the PEP application to the Department (the date must be on or before January 1, 2026). **The institution will report this information on the annual survey.**

Provide the name of the first PEP and the date the institution plans to submit the PEP to the Department for approval:

Provide the name of the second PEP and the date the institution plans to submit the PEP to the Department for approval:

Provide the name of the third PEP and the date the institution plans to submit the PEP to the Department for approval:

If more than three programs will be converted to PEPs, please provide the name of each PEP and the date the institution plans to submit the PEP(s) to the Department for approval (include separate sheets if necessary):

The institution is in compliance with this milestone

Date of compliance:

Please keep this information on file. The institution will be required to report this information on the annual survey.

2025-26 Milestones

Milestone 15 – Submit PEP(s) to the Department for Approval

The Institution must submit the PEPs to the Department for approval by January 1, 2026, and must have PEP programs approved before July 1, 2026, to continue offering Pell Grants to enrolled students.

The institution is in in compliance with this milestone

Date of compliance:

Provide the name of each PEP and the date the institution submitted the PEP to the Department for approval (include separate sheets if necessary):

Program Name

Date submitted for approval

Please keep this information on file. The institution will be required to report this information on the annual survey.