

REVISED SECOND CHANCE PELL EXPERIMENT

Understanding the Reporting Requirements of the Revised Second
Chance Pell Experiment

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U.S. Department of Education

WEBINAR ANNOUNCEMENTS & REMINDERS

- ✓ This webinar is being recorded. Closed Captions are available.
- ✓ This webinar and slide deck will be available for replay and posted on the ESI Website.
- ✓ We will take questions at the end of the presentation. If you have a question for us during the presentation, in the chat feature: please use the format: **Name, Institution, and “My Question is...”**
- ✓ For additional questions or points of clarification, please email experimentalsites@ed.gov.

AGENDA



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REPORTING PROCESS



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OVERVIEW OF THE REPORTING REQUIREMENTS

REVISED SECOND CHANCE PELL EXPERIMENT

REPORTING REQUIREMENTS

Annual Reporting (COD Template)

Participating institutions will be required to annually upload an Excel spreadsheet available in the ESI Reporting Tool in COD to report specific information for all individuals who submit a FAFSA for enrollment in a program under the experiment. The Excel spreadsheet will include:

- Identifying information (e.g., SSN, last name) for all students receiving Pell under the experiment
- The name of the program and Classification of Instruction Programs (CIP) code in which the individual enrolled
- The number of credits attempted and earned
- Indicators of academic progress, including program completion
- Other experiment-specific information as determined by the Department

REPORTING REQUIREMENTS (CONT.)

Annual Survey

- Terms of the institution's arrangements with correctional facilities and oversight entities (e.g., tuition and fees, caps on credits earned, support services provided, instructional delivery methods, and faculty characteristics)
- Challenges encountered by the institution as it develops a PEP under the new provisions and the specific solutions put in place to respond to those challenges
- Benefits experienced by the institution or its students as a PEP complying with the new provisions is put in place
- Balanced and thoughtful reflection of what the institution and confined or incarcerated students gain and lose with the adoption of the new PEP provisions

REPORTING REQUIREMENTS

Monthly Reporting

Participating institutions will be required to upload an Excel spreadsheet available in the ESI Reporting Tool in COD to report specific information for all individuals who submit a FAFSA for enrollment in experiment programs. The Excel spreadsheet will include:

- Identifying information (e.g., SSN, last name) for all individuals applying to receive Pell under the experiment
- Identifying information for all individuals on prior educational history

DATA COLLECTION & REPORTING – ANNUAL SURVEY QUESTIONS

- ✓ Challenges implementing Revised Second Chance Pell Program
- ✓ Unanticipated Benefits & Negative Consequences
- ✓ Interested Students that were unable to participate
- ✓ Barriers facing FAFSA completion
- ✓ Reentry or Career Services
- ✓ Federal/State Correctional Facility Partners
- ✓ # of programs offered under the experiment
- ✓ Programs not continuing under the *new PEP regulations*
- ✓ Program modifications under the Revised Second Chance Pell experiment

DATA COLLECTION & REPORTING (COD TEMPLATE)

- ✓ Name of Program
- ✓ CIP Code for Program
- ✓ Past Postsecondary Experience
- ✓ Grade Level at the Beginning and End of the Year
- ✓ Pell Award Amount
- ✓ Pell Disbursement Amount
- ✓ Total Non Title IV Grant or Scholarship Aid Awarded & Disbursed
- ✓ Total Title IV Aid Other Than Pell Awarded & Disbursed
- ✓ Pell Cost of Attendance
- ✓ Primary Mode of Instruction
- ✓ Fresh Start

EXPERIMENT EVALUATION

REVISED SECOND CHANCE PELL EXPERIMENT

EXPERIMENT PROGRAMS TRANSITION TO PEP

- Program(s) offered under experiment
- Plan to transition program(s) to PEP requirements
- Plan for students enrolled in program(s) not transitioning to PEP

EVALUATION

The Department seeks to evaluate specific benefits and challenges encountered by the institution while administering Pell Grants to confined or incarcerated students:

- Ongoing
 - Partnering with correctional facilities
 - Confined or incarcerated students' ability to complete the FAFSA
 - The verification process for incarcerated students
- New
 - The program approval process for PEPs under the new provisions
 - Oversight entity's process for determining the program(s) are operating in the best interest of students
 - Programmatic accreditation for PEPs

OVERVIEW OF SECOND PELL REVISED EXPERIMENT

WAIVERS

The following regulatory and statutory waivers will be part of the revised experiment:

- ✓ **HEA section 484(t)(3)** – *Confined or incarcerated individuals*. A student confined or incarcerated in a Federal or State correctional facility need not be enrolled in and eligible PEP to receive a Pell Grant. Students are required to be enrolled in a title IV eligible program
- ✓ **34 CFR 668.32(c)(2)(ii)** *Student eligibility*. Confined or incarcerated students enrolled at participating institutions need not be enrolled in an eligible PEP to receive Pell Grant funds. Students are required to be enrolled in a title IV eligible program
- ✓ **34 CFR 668, subpart P** *Prison education program requirements* (34 CFR 668.236 through 34 CFR 668.241). Participating institutions are exempt from all of subpart P of 34 CFR part 668 with respect to their existing Second Chance Pell programs, since those programs are not required to be eligible PEPs. Students are required to be enrolled in a title IV eligible program

All other provisions and regulations of the title IV HEA student assistance programs will remain in effect

PEP MILESTONES

PEP MILESTONE 1

Milestone 1 for 2023-24 award year

- By **June 30, 2024** participating institutions must have a signed written agreement with its correctional partner(s) (oversight entity) to comply with the new PEP requirements
- A copy of the agreement must be available to submit to the Department upon request and include the oversight entity's permission to offer the PEP at the correctional facility
- The agreement must include assurances that the oversight entity will provide the best interest determination for the proposed program with the first 2 years of the program's approval, and transfer and release data to the institution during the existence of the PEP

PEP MILESTONES 2-14

Milestones 2-14 for 2024-25 award year

- By June 30, 2025 the institution must be able to attest (and demonstrate if requested) that it has, at a minimum:
 - Determined the program(s) to be offered under the new provisions
 - Received approval from the oversight entity to offer the program(s) at the correctional facility
 - Informed 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)
- As part of the 2024-25 award year milestone, the institution also provide the status of the following PEP requirements
 - The methodology, including thresholds, benchmarks, standards, metrics, data, and other information the oversight entity will use in approving the PEP and how all of the information was/will be collected
 - Information about the types of services to be offered to admitted students, including orientation, tutoring, academic and career advising, and reentry counseling
 - The status of all programs currently offered under the experiment and the date on which those programs will be reported to the Department under the PEP provisions

PEP MILESTONES 2-14 CON'T

Milestones 2-14 for 2024-25 award year

- As part of the 2024-25 award year milestone, the institution also provide the status of the following PEP requirements
 - Certify the transferability of credits, PEP is designed for professional licensure or certification (if applicable), licensure of employment in profession not prohibited
 - Received accreditor approval of a PEP
 - Approval of Correctional Facility where PEP is offered as an Additional Location
 - A comprehensive plan for all Programs Offered under the Experiment
 - Date institution plans to submit a PEP application to the Department

PEP MILESTONE 15

Milestone 15 for 2025-26 award year

- 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

PEP MILESTONE REMINDERS

A few notable reminders regarding the PEP Milestones as apart of the revised experiment:

- ✓ The PEP milestones do not automatically guarantee approval to becoming an eligible PEP
- ✓ The Department does not need review any milestone achievements for that institution to move to the next milestone
- ✓ Milestones do not need to be completed in order
- ✓ If any Second Chance Pell Institution or any program under the experiment does not wish to transition to become an eligible prison education program, you must provide an explanation for your transition plan
- ✓ We encourage you to complete ALL milestones that include the Department of Corrections by₂₀ June 30, 2024. We recognize that the accreditor assurances may take longer

PRISON EDUCATION PROGRAM APPLICATION PROCEDURES

EXPERIMENT REMINDERS

- ✓ *A complete PEP application submission includes both the PEP application and the eligibility (additional location) update via the E-App*
- ✓ *Participating institutions must meet specific milestones for each program under the experiment that demonstrate progress toward developing approved PEPs*
- ✓ *The Revised Experiment ends on June 30, 2026*

PEP APPLICATION FORM

How to Apply for PEP Approval

E-App

Complete and submit the Electronic Application to Participate in the Federal Student Financial Aid Programs (E-App)

PEP APPLICATION

Complete PEP Application Form

A link to the [PEP Application Form](#) is available in the Knowledge Center

PEP APPLICATION FORM

KEY FACTORS



STREAMLINED APPLICATION PROCESS

Application includes instructions, required certifications and attachments



COLLABORATION AND PARTNERSHIP

Reinforces working with required partners that need to be involved in the PEP process

PEP APPLICATION REQUIREMENTS

Summary of regulatory requirements for a PEP Application

- ✓ Description of PEP
- ✓ Accrediting Agency approval
- ✓ Correctional Facility name
- ✓ Oversight Entity approval
- ✓ Services offered to admitted students
- ✓ Certifications and acknowledgement of specific PEP requirements



PEP APPLICATION FORM – SECTION 1

Section 1: General Information

All postsecondary institutions must complete Section 1

- Section 1A: Contact information for Title IV participating institution
- Section 1B: Contact information for Correctional Facility
- Section 1C: Contact information for Oversight entity

PEP APPLICATION FORM – SECTION 2

Section 2: Information Required for All PEP Applicants

All postsecondary institutions must complete Section 2

- Section 2A: No adverse action by an accrediting agency
- Section 2B: No current or pending actions by the State to revoke a license or other authority to operate
- Section 2C: Agreement with oversight entity to provide transfer and release data
 - *Copy of Agreement **required to be submitted** as Attachment 1 – Signed Agreement to Provide Transfer and Release Data*
- *Section 2D: Accrediting Agency Information and Approval Documentation*
 - *Copy of Approval documentation **required to be submitted** as Attachment 2 – Accrediting Agency Approval Documentation*

PEP APPLICATION FORM – SECTION 3

Section 3: Additional Institutional Information

Section 3 is only required if postsecondary institution is seeking approval of the first PEP at each of the institution's first two additional locations at correctional facilities

- Section 3A: Description of Educational Program offered
 - Institution may **optionally include** additional information about the educational program labeled as *Attachment 3 – Description of the Educational Program*
- Section 3B: Description of any partner entities that will be providing any part of the educational program
 - If the institution has entered into an agreement with partner entities, it **must include** a copy of the written arrangement to comply with 34 CFR 668.5 labeled as *Attachment 4 – Partner Entity Written Arrangements*

PEP APPLICATION FORM – SECTION 3

Section 3: Additional Institutional Information (continued)

- Section 3C: Admission Policy of the proposed PEP
- Section 3D: Types of services provided to admitted students
 - If reentry counseling is provided by a community-based organization then the institution **must include** a one-page document that contains the name of the CBO, background information on the CBO and the types of services that the CBO offers as labeled as ***Attachment 5 – Types of Services Offered to Admitted Students***
- Section 3E: Transfer of Credits policy
 - If the institution has a written articulation agreement, it **must include** a copy of that agreement labeled as ***Attachment 6 – Transferability of credits***. If the institution has articulation agreements with more than one institution, it must also include a listing of all institutions with which it has an articulation agreement in the attachment

PEP APPLICATION FORM – SECTION 3

Section 3: Additional Institutional Information (continued)

- Section 3F: Proposed PEP meets licensure requirements
- Section 3G: Employment in profession not prohibited
 - Institution may ***optionally include*** additional information about the Employment in profession not prohibited requirement as ***Attachment 7 – Optional Employment Information***.
- Section 3H: Initial Oversight Entity Approval of PEP and Best Interest of Students Determination
 - Part 1 – Oversight Entity approval
 - Part 2 – Best Interest Determination plan. Note: This is 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
 - Institution may ***optionally include*** additional information about the initial oversight approval of PEP and Best Interest of Students preparation as Attachment 8 – Oversight Entity Initial Approval and Plan to Prepare

PEP APPLICATION FORM – SECTION 4

Section 4: Institution and oversight entity assurances, certifications, and signatures

All postsecondary institutions and oversight entities must complete Section 4 to verify the accuracy of the information provided

- Section 4A: Institutional Assurances. The institutional contact person must certify the following:
 - Acknowledge and understand that the Department can limit or terminate approval of the institution to provide a PEP
 - Acknowledge and assure that the institution will provide the methodology by which the oversight entity made each best interest determination for the PEP
 - Acknowledge and assure that the institution will submit all required reports to the Department

PEP APPLICATION FORM – SECTION 4

Section 4: Institution and oversight entity assurances, certifications, and signatures (continued)

- Section 4B: Oversight Entity Assurances. The Oversight Entity Contact person (identified in Section 1 of the form) must certify the following:
 - Verify that the institution has approval to operate the proposed PEP in the correctional facility identified in Section 1
 - Acknowledge and assure that it will provide the required best interest of students' determination of the proposed PEP
 - Acknowledge and assure that it will allow programs to re-apply within a reasonable timeframe if it is determined the program is not operating in the best interest of students
 - Acknowledge and assure that it will maintain an agreement to provide transfer and release data with the institution during the existence of the PEP

PEP APPLICATION FORM – SECTION 4

Section 4: Institution and oversight entity assurances, certifications, and signatures (continued)

- Section 4C: Institutional Certification. An authorized institutional official must certify and sign the form
- Section 4D: Oversight Entity Certification. An authorized Oversight Entity official must certify and sign the form

PEP APPLICATION FORM – SECTION 5

Section 5: General Instructions

Section 5 provides general instructions regarding the E-App process and a reminder that the PEP Application Form must be included as supporting documentation when submitting the application through the E-App

When completing the E-App, be sure to follow these instructions specific to the PEP approval/reporting requirements:

- **Name and description of Educational Program (include “Prison Education” in the title of the program)**
- **Additional location.** In the Locations Section of the E-App, report the correctional facility as an additional location. Enter the facility’s official name after the pre-populated institution name. This requirement applies for correctional facilities even if the students receive instruction primarily through distance education or correspondence courses at that location
- **Accreditation (including Accrediting Agency Approval Documentation).** The institution was instructed to include the required Accrediting Agency Approval Documentation in Section 2D as Attachment 2

SUBMITTING THE PEP APPLICATION TO FSA

Must include completed PEP Application as supporting documentation when submitting the E-App

- Instructions for submitting supporting documentation are provided in the E-App
- PEP Application and supporting documentation must be submitted following instructions for submitting supporting documentation in the E-App
- If approved, the school will receive an Approval Letter and an Eligibility and Certification Approval Report (ECAR)



PEP APPLICATION FORM – HELPFUL HINTS

- ✓ Report the correctional facility at which the eligible PEP will be offered as an additional location
- ✓ **If applying for approval of the first PEP at the first two additional locations:** complete *all sections* of the PEP Application
- ✓ **If reporting a subsequent PEP beyond the first PEP at the first two additional locations, *offered by a new method of delivery*:** complete Sections 1, 2, and 4 of the PEP Application (Section 3 is not required)
- ✓ **If reporting a subsequent PEP beyond the first PEP at the first two additional locations, *not offered by a new method of delivery*:** complete Sections 1, 2, and 4 of the PEP Application (Section 3 is not required)
- ✓ Plan to work with one of the Department's Eligibility Analysts on the details of your application. You may be asked to respond to questions, submit additional documentation, etc.

PEP APPLICATION FORM – HELPFUL HINTS

- ✓ **If applying for, or reporting, more than one PEP:** complete a separate PEP Application Form for each PEP but report them all in one E-App submission
- ✓ Both the oversight entity and the school must complete the information in Section 4
- ✓ The school **must submit** a finalized signed copy of the agreement with the Oversight Entity labeled as *Attachment 1 – Signed Agreement to Provide Transfer and Release Data* with each PEP application
- ✓ The school **must submit** the required accrediting agency approval documentation, as described in Section 2D, labeled as *Attachment 2 – Accrediting Agency Approval Documentation*
- ✓ The school **must submit** a valid state license or other state authorization
- ✓ Submission of other attachments identified in the PEP Application Form are *conditionally required* as described in the PEP Application
- ✓ Where space is provided on the PEP Application Form for descriptive paragraphs, the school **must** provide the requested details
- ✓ Report the name of the eligible PEP in the Educational Programs Section on the E-App

RESOURCES

COMMON QUESTIONS & ANSWERS

- <https://experimentalsites.ed.gov>



FSA KNOWLEDGE CENTER

- New "Topics" page for PEPs at:
<https://fsapartners.ed.gov/knowledge-center/topics/prison-education-programs>
- Includes:
 - Final regulation for prison education programs
 - Dear Colleague Letters
 - Electronic Announcements
 - Fact Sheets related to the implementation of Prison Education Programs
 - Pdf of paper FAFSA form for confined or incarcerated students
 - Link to the Office of Postsecondary Education's Q&As

Vera's Vision, Mission, and Focus

Vision

Safe, Healthy, Empowered communities with truly just government institutions

Mission

Fight mass criminalization and create anti-racist, reparative justice systems

STRATEGIC AREAS OF FOCUS

1. End criminalization of people of color and immigrant communities
2. Minimize the footprint of jails, prisons, and detention centers
3. Center dignity and minimize the harms of justice and immigration systems
4. Blueprint accountable Institutions that move resources to communities

CONTACT

For more questions you can contact:

ExperimentalSites@ed.gov– Dedicated centralized mailbox for all policy and operational questions related to the Second Chance Pell experiment

QUESTIONS?

