Second Chance Pell Webinar: Q&A

June 17, 2020

1. Is there an example source of a memorandum of understanding (MOU) between a prison and a participating institution?

A: The Department does not have examples of MOUs used by other institutions. A participating school may reach out to another participating school to inquire if that school is willing to share an example. A listing of participants for all experiments, including Second Chance Pell is available on the ESI website: <https://experimentalsites.ed.gov/exp/pdf/ESIParticipants.pdf>.

1. Is there a template or guidance for a policies and procedures manual for the Second Chance Pell experiment?

A: The Department provides an Action Plan that provides information about the types of policies and procedures that are needed for the experiment. A link to the Second Chance Pell Action Plan is available on the ESI website: <https://experimentalsites.ed.gov/exp/pdf/SecondChancePellActionPlan.doc>.

1. We’ve turned in our PPA agreement, signed by our President.  Will we receive a copy of the fully executed agreement with the U.S. Department of Education signature?

A: Once the PPA amendment has been signed by your President/CEO and returned to the Department, your institution will receive the fully executed agreement from the Department. Your institution should keep this signed agreement on file throughout the duration of the experiment.

1. You mentioned the PPA signed agreement. As yet, we have not received any documents/agreements/etc. from the Department of Education. Was it sent via mail to university campuses?

A: The PPA amendments were sent via email to each institution’s President/CEO. You should check with your President/CEO for further information. If your institution’s President’s office has not received the amended PPA, please notify the ESI Team at [ExperimentalSites@ed.gov](mailto:ExperimentalSites@ed.gov) and we can assist.

1. Can we administer the Second Chance Pell experiment at a private prison? This is a private facility contracted with the state.

A: If a private prison has contracted with the state as a prison that is part of that state system, students incarcerated in that private facility would be eligible in the same way that students would be in a state-run facility.

1. Once we are approved as a participating institution, how long are we approved? Does this expire or need to be renewed?

A: Once your institution is approved to participate in the experiment, you are approved for the duration of the experiment.

1. Are schools under this experiment unable to offer a degree fully online?  
     
   A: Yes. An institution may offer a program online under the Second Chance Pell experiment as long as the institution maintains the appropriate accrediting agency approvals, state authorization, and the design of its program meets the Department’s requirements for distance education.
2. I report enrollment to the National Student Clearinghouse. Should these students be included on that report?

A: Yes. You should include Second Chance Pell students in your reporting to the National Student Clearinghouse.

1. Will any follow up webinars be offered in the future?

A: Follow up webinars may be presented by either the Department of Education or the VERA Institute of Justice. If a webinar is scheduled in the future, participating institutions will receive an invitation that will provide instructions for joining.

1. We are a clock hour institution. How can we handle any prolonged medical absences of a faculty member since we cannot provide a substitute that has been through required Department of Corrections (DOC) training?

A: Institutions should work directly with their correctional facility in this situation. If the school has to suspend instruction in the program for longer than 30 days due to the faculty member’s absence, you may be required to perform Return of Title IV Funds (R2T4) calculations for students in the program.

1. When the school signs the PPA amendment, does it need to also add the additional prison site on the E-App as well if more than 50% of instruction is occurring there?

A: Generally, if 50 percent or more of a student’s program can be completed at the correctional facility, the correctional facility will need to be reported as an additional location on the E-App. The procedures for reporting additional locations are not waived under the experiment. As a reminder, additional locations must be accredited by your state and/or accrediting agency.

1. Do you have samples of any school’s request/application to their accrediting agency to add the correctional faculty as an added location?

A: We do not have any examples of a school’s request to add an additional location. The procedures for adding an additional location under the experiment are the same as the normal requirements outside the experiment. We suggest that you reach out to your School Participation Team for guidance.

1. What will happen to an institution’s allocation if a student is released from time served, has a disciplinary issue and/or is removed from the program? Will the amount allocated for that student be available for another potentially qualified student?

A: Pell funding is student specific. An institution can provide Pell funding to any otherwise eligible student under the experiment as long as the total amount disbursed for all students under the experiment does not exceed the allocation provided to the institution by the Department. If a student withdraws, some funds may need to be returned to the Department under normal Return of Title IV funds requirements. In that case, the amount returned would not count toward the total amount that the institution was allocated for the experiment.

​

1. How do you determine the total allocation for each school participating in this experiment?

A: FSA will reach out to schools each award year and ask schools to provide an estimate of the number of students and estimated Pell funds they expect to disburse during the upcoming award year. FSA will use this information to determine the institution’s allocation each year.

​​

1. Has there been any precedent for a state prison system or state law that restricts access to programs for people with specific charges (separate from the drug and sex offenses already mentioned)?

A: We are not aware of any law of this type. Corrections agencies typically have policies in place that govern who can participate in programming led by people from outside institutions, such as colleges. This policy may govern who can participate.

1. Is the "time to release" criteria for award eligibility a recommendation or a requirement?  In other words, can we support students who are more than 5 years to release?

A: Institutions must give priority for participation in this experiment to students who are likely to be released in 5 years or less. However, students who have a release date of more than 5 years are still eligible to participate under the experiment.

1. Are we expected to provide computers and connectivity so the students can access the LMS?

A: An institution is not required to provide computers for students. However, it is expected that students have access to proper resources based on the method of instruction that is used for the program.

1. Could you please elaborate on entering the FAFSA information into CPS online?

A: The institution will provide a paper copy of the FAFSA from studentaid.gov to each student. The institution will take the *signed and countersigned* paper copy of the FAFSA and enter into FAA Access to CPS Online. Please review the Application Verification Guide, page 3-5.

1. If an Adult in custody commits a forcible or nonforcible sexual offense and does not need to complete a involuntary civil commitment, are they still eligible?

A: Yes. The limitation on Pell Grant eligibility under Section 401(b)(6) related to sexual offenses only applies to individuals subject to an involuntary civil commitment following incarceration. Individuals incarcerated for such offenses remain eligible for Pell Grant funds under the experiment while they are incarcerated at a federal or state penal institution.

1. I assume that students who have not registered for selective service are not eligible until registered, correct?

A: Students participating in the experiment must:

* + have a high school diploma or a state recognized equivalent,
  + Be a U.S. citizen or a eligible non-citizen
  + Maintain satisfactory academic progress
  + Be a regular enrolled student in a Title IV eligible program
  + Not be in default on a student loan or owe Title IV overpayments
  + For all males, between the ages of 18 and 25, the student must have registered with the Selective Service

Please keep in mind that if the student was required to register with Selective Service but was unable to register due to being incarcerated (and remained incarcerated through age 25) that student would qualify for a waiver of the Selective Service requirement.

1. If this experiment started in 2016 and you said that most experimental programs go 3-4 years, when do you expect this program to end?

A: Typically, most experiments are active for at least 3 award years, but some have continued longer. The Department needs time to collect enough data in order to assess the impacts made by the experiment. We anticipate this experiment will last at least 3 award years beyond the 2020-21 award year. The Department will provide participating institutions with sufficient notice if a decision is made to end an experiment.

1. Is there a restriction on students with life sentences?  
      
   A: A person with a life sentence with the possibility of parole is eligible under the experiment. An incarcerated individual serving a life sentence without the possibility of parole is ineligible for Pell Grants under the experiment.
2. Are students eligible to receive credit balances under this experiment? Or is that determined by the institution and the correctional facility?

A: Under this experiment a student’s cost of attendance for the academic program is limited to tuition and fees, and books and supplies. As a result, a credit balance could only occur if the school does not supply the student’s books and supplies. In these cases, since the books and supplies cost are allowable educational expenses, then, depending on the student’s Pell Grant eligibility, the school may be required to provide a credit balance to the student. If the student’s tuition and fees costs do not meet or exceed Pell eligibility, then the remaining Pell eligibility would be extended to the student for books and supplies. If the school does not provide books and supplies to its students, and as a result cannot include books and supplies as an institutional charge, then the student may be eligible to receive the credit balance to help pay the cost of the books and supplies they would need for their program.

To avoid credit balances to students, your institution may want to consider making books and supplies part of institutional charges.

Under this experiment schools can provide books and supplies to these incarcerated students as part of their institutional charges without requiring the students to opt out of receiving their books and supplies directly from the school. If a school chooses to do this, they must ensure that their books and supplies costs are reasonably competitive to the best market price.

The institution should work with the correctional facility regarding how credit balances are disbursed and if there are restrictions imposed by the correctional facility, the institution should work to avoid credit balances by including books and supplies as part of their institutional charges as explained above.