Second Chance Pell Webinar Transcript
June 17, 2020
1:30pm – 3:00pm Eastern Time

**Slide 1:**

Good Afternoon and welcome to the Second Chance Pell: Pell for Students Who Are Incarcerated Training Session. My name is Ashley Shuler and I am one of your trainers today. Also joining me today is Michael Cagle, David Musser, Kerri Moseley-Hobbs, David Rhodes, and Melanie Storey various other members of the ESI Team. All presenters and members of the ESI team will be assisting with the Question and Answer portion of the training today.

Before we begin, I would like to go over a few housekeeping items. Today we are using Microsoft Teams for our presentation. We ask that you keep your phones muted throughout the presentation today. You will have the opportunity to ask questions at the end using the chat feature. We will inform participants at the conclusion of the presented portion about the procedure for questions.

As we noted in our registration instructions, we had to limit the number of participants from each school to one. We apologize about this, but we will post the PowerPoint, transcript and Q&As from this session to the ESI website within the next week.

Everyone has a copy of the PowerPoint and we suggest you follow along with us as we go through the session today. Again, please ensure that your phone is muted.

We will not be recording the session today, but we will post a copy of the presentation, a transcript and Q&As to the ESI website soon.

Now let me turn the session over to Melanie Storey.

**Slide 2:**

Thank You.

The purpose of this session is to provide guidance to schools who have been accepted into this experiment. During this webinar we’ll have a brief overview of the experiment that will generally serve as a reminder of the purpose of the experiment, the statutory and regulatory waivers provided for this experiment, evaluations expectations, and other information that has been previously presented. We will also provide you with information that will ensure a successful implementation of this important experiment including an introduction to VERA who is tasked with providing technical assistance for the experiment. Staff from VERA will be introduced at the end of the session before the Q&A section.

Now, I would like to turn this over to Ashley Shuler.

**Slide 3:**

Thank you, Melanie.

Simply stated, our agenda today includes an overview of the experiment, including brief explanations of the details included in the Federal Register notice published on August 3, 2015.

We will discuss the requirements for participating schools including preliminary ideas on reporting and evaluation.

And finally, we will discuss the details for successfully implementing the experiment, including the various resources available. This will include reviewing some common questions and answers from schools currently participating in the experiment over the past few years. The questions and answers are posted to our website and can assist new schools as they implement the experiment. Further, we will discuss the potential impacts of COVID-19 and provide additional resources available to schools with programs impacted by COVID-19.

**Slide 4:**

Implementing the experiments will require coordination amongst various offices on your campus; and special to this particular experiment, you will need to coordinate with the correctional facility that you are partnering with.

Institutions should view participating in ESI as a collaborative effort; that means you will need to work with other offices at your institution, such as the Financial Aid Office, Business Office, Faculty, Registrar, Admissions, Communications, and the President’s Office. That is not an exhaustive list, so you may want to think about other offices (some that may be unique to your institution) that you will work with. Other groups you may partner with will be your accrediting agency, vendors, state agencies and other policy stakeholders.

Please keep in mind that while the Department of Education is charged with matters pertaining to postsecondary education and federal student aid, the function of the correctional facilities that you partner with for this experiment are not under the jurisdiction of the Department of Education, but would be under the jurisdiction of the Federal Bureau of Prisons or their prospective states (whichever is applicable).

Although under this experiment schools are exempt from certain parts of the regulations, you are required to adhere to all other Title IV requirements.

You can see the administrative capability regulation on the screen – that is the regulation that requires institutions – not just financial aid staff – to craft policies that are compliant with Federal laws and regulations. These experiments are no exception: it is vitally important that you develop and carefully document your policies & procedures related to this experiment. You also want to ensure that you are in compliance with both Federal and institutional policies.

Remember, administering federal student aid is an institutional responsibility. It is not just the responsibility of the financial aid staff. Involving all appropriate offices on your campus will assist with successful implementation of the experiment.

**Slide 5:**

Let us review the Department’s objective for this experiment.

This experiment will examine how waiving the restriction on providing Pell Grants to individuals incarcerated in Federal or State penal institutions influences participation in education opportunities and academic outcomes. The experiment will also examine whether there are any challenges or obstacles to a postsecondary institution's administration of the Title IV HEA programs to incarcerated students.

Specifically, we are interested in reviewing how receiving Federal Pell Grant funds impacts incarcerated students; examining any challenges related to the availability, use, and administration of Federal Title IV funds.

We may also consider elements such as the academic programs and credentials these students pursue, as well as time to degree and rate of which they are able to complete their program. Specific elements of data collection, evaluations, and outcome measurements will be determined as we continue collaborating with different stakeholders.

**Slide 6:**

What does participation in this experiment mean for schools?

The experiment will allow participating schools 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. We would be particularly interested in those students who are likely to be released within five years of enrollment in the academic program. For the purpose of this experiment, schools should focus on the date that the student is “eligible” for release, instead of trying to determine an actual release date.

It is important to note that we state that students are “otherwise” eligible for Federal Pell Grants. We state this because this experiment only waived the statue that prohibits students incarcerated in federal or state penal institutions from receiving Pell Grants. This means that all other Federal Pell Grant eligibility requirements are still required. This includes, but is not limited to, having completed a FAFSA, being a U.S. Citizen or eligible non-citizen, having a high-school diploma or equivalent, and being enrolled in an eligible program.

We understand that the requirement that students have a high school diploma, or its equivalent is an issue that could impact this population. While we have not waived this student eligibility requirement, there are potential alternatives that postsecondary institutions may want to consider assisting their students should they find that high school diplomas or their equivalent presents a significant barrier. We will discuss this later in this presentation.

**Slide 7:**

Let us look at what this experiment specifically waives.

Under the current rules, amongst other limitations that may cause a student to be ineligible for a Pell Grant, there is a restriction that prohibits students incarcerated in federal or state penal institutions from receiving federal student aid. This experiment will waive that restriction and allow these students to receive Pell Grants.

Specifically, the experiment waives Section 401(b)(6) of the HEA and 34 CFR 668.32(c)(2)(ii) of the federal regulation. It should be noted that Section 401(b)(6) of the HEA also addresses sexual offenses which is something that we are ***not***including in the waivers. I will discuss this on the next slide.

**Slide 8:**

This experiment does not waive Section 484(r) of the HEA that states that **“A student who is convicted of any offense under any Federal or State law involving the possession or sale of a controlled substance for conduct that occurred during a period of enrollment for which the student was receiving any grant, loan, or work assistance under this title shall not be eligible to receive any grant, loan, or work assistance under this title from the date of that conviction for the period of time specified..”**

In addition this experiment does not waive the provision in Section 401(b)(6) of the HEA that prohibits individuals subject to an involuntary civil commitment upon completion of a period of incarceration for a forcible or non-forcible sexual offense from receiving Federal Pell Grants.

Finally, this experiment does not waive the cost of attendance provision in Section 472(6) that limits the cost of attendance for incarcerated students to tuition, fees, and if required, books and supplies. We will discuss COA for incarcerated students later in this presentation.

**Slide 9:**

Other student eligibility provisions that are not waived are outlined on this slide.

Students participating in the experiment must:

* + have a high school diploma or a state recognized equivalent,
	+ Be a U.S. citizen or an 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
	+ If a male between the ages of 18 and 25, the student must have registered with the Selective Service

**Slide 10:**

Let us discuss some specific requirements for this experiment.

Students included in your cohort who receive a Pell Grant under this experiment must meet certain requirements.

Included in these requirements is giving priority for participation in this experiment to students who are likely to be released in 5 years or less. Again, for the purpose of this experiment, schools should focus on the date that the student is “eligible” for release, instead of trying to determine an “actual” release date.

**Slide 11:**

Another requirement under this experiment is that students must be able to complete their program post release if they cannot complete the program during their incarceration.

This means that should a student not complete their program while incarcerated (either by design or because they were released before completion), the school should be able to provide or collaborate with others to offer the student the ability to re-enroll and complete the program post release.

We also expect schools, as good stewards of Federal Title IV programs, to provide “reasonable” opportunities for completion. “Reasonable” opportunities may include ensuring the opportunity to complete the program at a location or manner that is easily or reasonably accessible to the student upon their release.

**Slide 12:**

Another requirement under this experiment is that schools must ensure that students under this experiment are enrolled in programs that prepare them for careers in fields where they can be employed.

This may be considered a step beyond gainful employment since you will need to consider fields where the student may face legal barriers in employment because of their current or past convictions. We will consider providing further guidance regarding the extent in which schools must ensure employability.

**Slide 13:**

Finally, under this experiment schools must provide academic and career guidance, as well as transition services to their incarcerated students to support successful reentry.

This is to help ensure that the students under the experiment are equipped with not only the academic knowledge that the program offers, but also the aptitude to utilize the knowledge and applicable credentials post-release.

**Slide 14:**

This slide serves as a reminder that Pell Grant funds made available to eligible students through this experiment are intended to supplement, not supplant, existing investments in postsecondary prison-based education programs.

Participating schools, correctional facilities, or other entities may not use the Pell Grant funding provided under this experiment to disinvest their own resources.

**Slide 15:**

Included in the student eligibility requirements for Pell Grants is the requirement that students have earned a high school diploma (or its state approved equivalent – for example, the GED). The ability to benefit provision provides special consideration for students without a high school diploma to gain eligibility for Pell Grants through eligible career pathway programs.

More information and additional guidance on this provision is available in a “**Dear Colleague Letter”** published on **May 9, 2016** on the Information for Financial Aid Professionals (IFAP) website **www.ifap.ed.gov.**

To access the letter, click the hyperlink above. You can also visit **www.ifap.ed.gov**. Under the section for Letters and Announcements, you will see a link to “**Dear Colleague Letters**.” Click on that link and select 2016, then scroll down until you find the link to GEN-16-09 titled **“Changes to Title IV Eligibility for Students Without a Valid High School Diploma Who Are Enrolled in Eligible Career Pathway Programs”.**

I will now turn this over to my colleague Michael Cagle who will continue the presentation.

**Slide 16:**

Thanks Ashley. Let us take a few moments and discuss the amended Program Participation Agreement (PPA) Process.

The PPA amendments have been sent to the President’s office. Please carefully review the PPA amendment and understand your institution’s commitment to participate in this experiment.

If you have not already done so, your institution will need to obtain the required signatures and return the signed Amendment to FSA.

FSA will then send the school a countersigned amendment to the PPA. The school must keep this countersigned amendment on file.

Your school cannot officially begin participation in the experiment until it receives the countersigned amendment to the PPA.

When a school has a fully executed amendment to their (PPA Amendment) for the Experiment, they will receive a Welcome Letter from the ESI Team. This will inform the institution that they may begin implementation of the experiment and **will also include the amount of Pell the school is able to disburse under the experiment for the award year.** We anticipate schools will be able to begin during the 2020-21 award year. However, we understand some schools may not be ready until later in the award year or the beginning of the next. We will ask schools to notify the Department of its status if it decides to delay participation to a later award year.

We would now like you to answer the question on the next slide.

**Slide 17:**

When will you begin participating in the experiment?

Please use the chat feature to enter one of the following:

Summer 2020

Fall 2020

Spring 2021

Later

We would like to utilize the chat feature here to get a sense of when your institution plans to begin implementation of the experiment.

Keep in mind that your institution needs to have the countersigned copy of the PPA amendment before it may begin implementing the experiment.

Further, the Department will soon forward more information about the Federal Pell allocation for each institution under the Second Chance Pell experiment.

Please enter the information using the chat feature indicating when you believe your institution will be ready to begin enrolling students and disbursing Pell under the experiment.

Ashley, how are we doing?

Thanks for your active participation in the poll.

**Slide 18:**

We are going to spend time discussing credit balances on the next few slides.

We understand that schools and correctional facilities are concerned about Title IV aid credit balances. A Title IV credit balance occurs when the total Title IV financial aid, in this case Pell Grants, that is disbursed to the student exceeds the student’s total institutional charges. When this occurs, schools must disburse the credit balance to the student.

However, under this experiment the students cost to attend 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.

However, there is an opportunity to avoid these credit balances and we will discuss this on the next slide.

**Slide 19:**

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 they make the books and supplies available to students below competitive market rates.

**Slide 20:**

Even if schools include books and supplies as part of their tuition and fees, there may be rare instances where even that cost does not exceed the student’s Pell Grant eligibility resulting in a credit balance. However, credit balances under these circumstances will be avoided under this experiment as schools are directed to adjust the student’s Pell grant award provided on the Pell schedule to eliminate credit balances. This should be completed because, per the statement of educational purpose that the student agrees to when they complete the FAFSA, Title IV aid should only be used to cover educational costs. For students under this experiment, educational costs are limited to direct institutional charges (tuition and fees, and if included, books and supplies).

Let us explain this further on the next slide.

**Slide 21:**

Here is an example of how Pell disbursements should occur under this experiment:

The amount of a student’s Pell Grant award is a function of the student’s Expected Family Contribution (EFC) and the student’s COA. Ranges of each of those factors are displayed on the two axes of a Pell Grant Payment Schedule with the nexus being the Pell Grant award amount. Those ranges are presented in $100 increments with the award amount calculated as half of the difference between the two factors.

For example, the award for a student with an EFC of 0 and a COA of $1,814 ($1,700 for tuition and fees and $114 for books and supplies) would be where the EFC column of 0 meets the COA row of 1800-1899. That intersection would result in an award of $1,850. However, since the institutional cost of $1,814 is less than the Pell Grant award amount, and the student has no further educational costs, the school should disburse $1814 instead of the scheduled award of $1850.

Again, because COD will not recognize, monitor, or reject a disbursement that exceeds educational costs if it is within the Pell Scheduled disbursement, schools will need to monitor their awards and disbursements to ensure they do not exceed educational costs.

**Slide 22:**

However, while schools should adjust the Pell award to avoid the credit balance, schools should not increase an award beyond what is provided on the Pell schedule to cover charges that exceed the Pell Grant award. For example:

A Pell Grant award for a student with an EFC of 0 and a COA of $1,875 ($1,700 for tuition and fees and $175 for books and supplies) would be where the EFC column of 0 meets the COA row of 1800-1899. That intersection would result in an award of $1,850. However, even though the institutional cost of $1,875 is more than the Pell Grant award amount, even though the student has further educational costs, the school **should not** increase the Pell disbursement to $1875 because it exceeds the Pell award of $1,850 per the Pell schedule.

**Slide 23:**

Let us spend a few minutes discussing how students in the experiment apply for Title IV aid.

If the students at the correctional facility have access to the internet, the student is still able to complete their FAFSA using the online FAFSA on the web. Students under this experiment will complete the same FAFSA as all other students (meaning there is no “special FAFSA”).

Students without access to the internet have the option to complete a paper FAFSA. Postsecondary institutions under this experiment will need to utilize the PDF version of the FAFSA and bring copies to provide to students. Schools may also want to consider having the student complete and sign the paper FAFSA which the school then uses to input the student’s FAFSA through FAA Access to CPS Online. Our current guidance for students incarcerated in local correctional facilities and juveniles confined in juvenile justice facilities is that they should use the mailing address of their current facility. Students under this experiment (those incarcerated in federal or state penal institutions) should adhere to that same guidance to ensure that students receive all documents related to their eligibility including:

Student Aid Reports

Award Letters/other notifications

Verification Requests (if the student is selected)

And any other information related to determining the student’s eligibility.

**Slide 24:**

Let us discuss students who withdraw and how this would impact R2T4.

We understand that this experiment presents a special consideration regarding R2T4, or withdrawal calculations. Generally, the question is “Does an R2T4 calculation need to be performed when a program ends or is suspended by the correctional facility”. For example, what if the correctional facility suspends the program for 2 weeks because of disciplinary or safety issues?

If the school expects that the program suspension will be less than 30 days, the school does not need to take immediate action regarding R2T4.  The school can wait for the suspension period to lift and continue the academic program. However, if the school expects that the suspension will be longer than 30 days or that the program suspension that was, for example, originally 2 weeks but becomes longer than 30 days, the school must perform an R2T4 calculation immediately.  An R2T4 calculation should be performed 30 days from the original date that the program became suspended and, if required to do so, Title IV funds must be returned to the Department of Education 45 days from original date of the program suspension.

Note: If the program resumes and the student returns to the program within 180 days of the program being suspended, the student may resume the program from the point of suspension and the R2T4 calculation can be reversed.

In contrast, if the correctional facility is ending the program completely, an R2T4 calculation is required to be performed within 30 days that the school is aware the program is ending.

**There are special provisions for R2T4 resulting from the CARES Act.  We will discuss these provisions in more detail later in the presentation.**

**Slide 25:**

Let us turn our attention to the required agreements between the postsecondary institution and the correctional facility.

For the purpose of this experiment, generally the agreement between the school and the correctional facility is just that, an agreement between the school and the correctional facility. However, based on our meetings with stakeholders including the Department of Justice, there are a few things that schools may want to consider as they move forward:

Consider including in your agreements not only your needs of an academic program, but also those things that would be expected of you as a participant in this experiment. For example, while we expect that the data the Department of Education seeks to collect related to the experiment is data that the institution would have (since it is related to the awarding and administration of Federal Pell Grants, and academic program enrollment and completion rates), schools may want to determine if they should include how information or data is collected from or about the students from within the correctional facility. We will discuss evaluations later in the presentation.

**Slide 26:**

Schools may also want to consider including a policies and procedures manual, or a resource guide of how the academic program would be implemented at the correctional facility. This includes things like, how behavior effects program participation, inmate limitations, correctional facility procedures and responsibilities, and inmate responsibilities, to name a few.

**Slide 27:**

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. More information on additional location requirements can be found in federal regulation:

* 34 CFR 600.21(a)(3) which discusses the requirement to report to the Department accredited and licensed additional locations within 10 days.
* 34 CFR 600.21(d) which discusses the disbursement rules related to additional locations; and
* 600.20 (c)(1) which discusses the circumstances when a school must wait for Departmental approval before disbursing Title IV aid at accredited and licensed additional locations.

Information can also be found in the FSA Handbook, Volume 2, chapter 5.

In general, whether an institution simply notifies the Department about a location or whether it must wait for ED approval depends on the institution’s status.  Under most circumstances, 34 CFR 600.21(a)(3) applies, and the institution just needs to report the location to the Department (it does not need approval) before it disburses Title IV aid to students attending at the additional location.  However, if certain other conditions apply (e.g. if the institution is provisionally certified, is on a payment method other than advance, the school has acquired the assets of another school that provided educational programs at that location during the preceding year, or the Department has otherwise required the school to gain approval for additional locations), then the school must report the location(s), ***and wait for approval from ED*** before it can offer Title IV at the location(s). This is clearly outlined in 34 CFR 600.20(c)(1).

Schools that will offer 50 percent or more of an eligible program at the correctional facility should begin the accrediting agency and State approval process now. The timeline for that process can vary depending upon the accreditor. Once the accreditor and state approvals are granted, the school can then report the additional location(s) to the Department and work with its School Participation Team to determine if it can begin disbursing aid to students at that location or if it must wait until the Department approves the additional location.

**Slide 28:**

The Department allows schools participating in the Second Chance Pell experiment to partner with each other as long as each school is a current participant with a signed PPA amendment.

The proper agreements must be in place as required under 34 CFR 668.5(a) (Written arrangements between eligible institutions).

If one or more participating institutions enter into agreements, the total amount of Pell funds that can be disbursed under the experiment will be limited to the amount allocated to the school that will be disbursing the Pell and maintaining information on the student’s eligibility. That school will also be responsible for reporting information about the student on the monthly and annual template in COD.

All participating schools will need to complete the survey individually.

**Slide 29:**

Since the beginning of the experiment in 2016, the Department has developed common questions and answers brought forth by schools that began participation in the experiment in the first cohort. Those questions and answers are available on the ESI website. Your institution may find these helpful to you as you begin implementing the experiment on your campus.

The Q&A document is updated as other important questions arise.

**Slide 30:**

As a participant in the Second Chance Pell experiment, we recognize that you may be experiencing unique challenges related to disruptions caused by the COVID-19 virus. We have heard from numerous postsecondary institutions participating in the Second Chance Pell experiment that prisons’ responses to COVID-19 have created significant challenges for the continuation of instruction at prisons, including cases where prisons have suspended all in-person instruction. Several postsecondary institutions have requested the ability to shift to correspondence education in order to continue instruction to students during this period.

As many of you may know, the use of correspondence education in the Second Chance Pell experiment is prohibited. At this time, the Department does not plan to lift this restriction. However, in cases where a postsecondary institution is working with a prison that has suspended in-person instruction, there are several other options, including the use of distance education.

As described in the Department’s [April 3, 2020 Electronic Announcement](https://ifap.ed.gov/electronic-announcements/040320UPDATEDGuidanceInterruptStudyRelCOVID19) and [May 15 updates,](https://ifap.ed.gov/electronic-announcements/051520UPDATEDGuidanceInterruptStudyRelCOVID19May2020) postsecondary institutions have an array of different options regarding how they offer distance education to students. Because of the COVID-19 national emergency, and as an emergency measure to accommodate students, the Department has provided broad approval to postsecondary institutions, including Second Chance Pell participants, to use distance learning modalities without going through the standard Department approval process, even if the postsecondary institution would normally be required to seek Departmental approval for the use or expansion of distance learning programs. Postsecondary institutions may provide distance learning temporarily to accommodate students as a result of a COVID-19 interruption, including in cases where students began attendance in classes offered in a brick-and-mortar setting but are transitioned to a distance education format in the middle of the term. At this time, this flexibility applies only to payment periods that overlap March 5, 2020 or that begin on or between March 5 and December 31, 2020.

**Slide 31:**

**Extension of Standard Terms**. Many postsecondary institutions may wish to extend the length of their terms in order to account for periods when instruction was suspended as a result of COVID-19. During the period of the emergency, postsecondary institutions may offer courses to those students on a schedule that would otherwise cause the program to be considered a non-standard term or a nonterm program, if doing so enables those students to complete the term. If a postsecondary institution utilizes this flexibility, it can continue to disburse aid based on its original academic calendar. These flexibilities will also be provided to postsecondary institutions or their additional locations or programs that must temporarily cease academic instruction or extend scheduled breaks as a result of COVID-19.

**Leaves of Absence.** For students who wish to take an approved leave of absence due to COVID-19-related concerns or limitations, the Department will permit them to take such leave for the purposes of Title IV fund eligibility, even if the student notifies the postsecondary institution of his or her request after the date that the leave of absence has begun. In such a case, the postsecondary institution may retain the Title IV funds for that student to apply when the student resumes enrollment.

Normally, postsecondary institutions are not permitted to put students on a leave of absence during the suspension of coursework, including clinicals or internships/externships; however, if the coursework suspension results from COVID-19, in this limited circumstance the Department will permit the postsecondary institution to put the student on an approved leave of absence until the postsecondary institution can resume coursework.

**Waiver of R2T4 Requirements under the CARES Act.** Despite the flexibility described here, there may be occasions where the postsecondary institution cannot continue instruction and does not believe that it will be able to resume instruction in a term. In these cases, the postsecondary institution must consider students to be withdrawn. However, the CARES Act allows a postsecondary institution to waive the Return of Title IV funds calculation and associated returns if a student withdraws, or a postsecondary institution suspends instruction, as a result of COVID-19 disruptions. The Department will provide additional information on this relief in guidance that will be available on the Department’s [COVID-19 website](https://www.ed.gov/coronavirus).

The Department also permits postsecondary institutions to continue to report a student’s enrollment as “in-school” if the student’s coursework was temporarily suspended by the postsecondary institution. The postsecondary institution should only report the student as “withdrawn” if he or she officially withdraws or fails to return at the next scheduled period of enrollment.

**SAP**: Section 3509 of the CARES Act allows institutions to exclude from the quantitative component (pace measurement) of satisfactory academic progress (SAP) attempted credits a student was unable to complete as a result of the COVID-19 national emergency. It is not necessary for a student to have filed an SAP appeal for an institution to exercise this flexibility. However, to exclude attempted credits from SAP, an institution must have reasonably determined that the student’s failure to complete those credits was the result of a COVID-19 related circumstance. More information regarding what constitutes an allowable circumstance are outlined in the May 15, 2020 COVID-19 guidance issued by the Department.  We provide a link to this document on the next slide.

Regarding the effect of excluding attempted credits on maximum timeframe, institutions should review the May 15, 2020 COVID-19 guidance issued by the Department.

**Slide 32:**

There are many resources available for COVID-19.  We outline several helpful resources on this slide.

We encourage you to review this information if you have not already done so.

**Slide 33:**

FSA is trying to minimize the reporting burden imposed on participating schools.

Reporting will focus on experiment specific information. There will be two parts to the evaluation process.

First, schools participating in the experiment will be asked to complete an annual survey. This survey will collect information on:

* Any postsecondary level instruction offered prior to the experiment
* The institution’s partnership with the penal institution and any unforeseen challenges
* Aspects of the institution's arrangements (e.g., tuition and fees, caps on credits earned, support services provided, instructional delivery methods, and faculty characteristics)

**Slide 34:**

In addition to the survey, let us discuss the additional information that will be collected.

To evaluate the experiment, participating institutions will be required to collect, maintain, and report information about incarcerated individuals applying for and receiving Federal Pell Grants under the experiment. The information may include:

* The number and characteristics of students applying for and actually enrolled in postsecondary courses.
* The number of postsecondary credits students attempt and earn.
* The amount of Federal Pell Grant funding awarded and disbursed to each applicant. Indicators of academic progression and completion.
* The number and characteristics of low-income students who participated in the experiment.

The Department will collect most of this information by collecting personal identifiers for students who are part of the experiment. The institution will upload this information using the ESI Reporting Tool within COD. We will discuss this in a couple minutes.

**Slide 35:**

As previously mentioned, the Department is making every effort to focus data collection exclusively on experiment-specific information not reported elsewhere.

For example:

* Information on the specific programs made “experimentally” eligible for Title IV assistance
* The types and amounts of grant and loan assistance received by the students affected by the experiment
* Academic outcomes for the students affected by the experiment

Again, most of this information will be reported using the ESI Reporting Tool within COD. We discuss this on the next slide.

**Slide 36:**

The Department has developed a Reporting Tool within COD to collect evaluation data. There is a template available in COD in the form of an Excel spreadsheet that institutions will download in order to report both the monthly expenditures and the final report.

All participating schools are required to report monthly expenditures. Schools will complete specific columns of the spreadsheet and then upload it into COD. The spreadsheet includes specific identifiers for each student participating in the experiment. In addition, participating schools will be required to upload a final spreadsheet with ALL columns completed for each student who was part of the experiment during the award year as soon as possible after the award year ends. The Department will reach out to schools once this final Excel spreadsheet is due.

Each year, the Department will provide a workbook posted to the ESI website that includes instructions for the upload process.

The Department will review the information submitted by participating schools and conduct the experiment wide analysis. A report will be developed that outlines the results of the analysis conducted by the Department.

**Slide 37:**

Because the Second Chance Pell Experiment *is* an experiment, the U.S. Department of Education has a budget of how much Pell Grant can be disbursed annually to all students at all participating schools under this experiment. Based on the estimates that schools provided on their questionnaires submitted to us for participation in this experiment, we believe that the budget, or cap, on annual Pell Grant expenditures under this experiment will not exceed the budget provided to us.

However, because there is a Pell budget, it is important for schools to monitor and alert the Department of Education if they believe that they will exceed the total enrollment or total Pell Grant disbursements that it estimated it provided to the Department (and included in the institution’s Welcome Letter). We will provide more information about your institution’s allocation for the upcoming award year very soon.

We make a concerted effort to internally monitor the Pell Grant expenditures under this experiment. However, since our efforts to monitor expenditures depends greatly on COD reporting and the data reported to the Department through the ESI Reporting Tool, it is very important that schools ensure timely reporting of disbursements to COD, and timely reporting of requested data for the evaluations for this experiment.

**Slide 38:**

The Experimental Sites website is a useful resource that you all should become familiar with and access to assist you with implementing your experiment. The web address is located on the top off the slide. We hope you save it as a favorite to your desktop.

One of the documents that you should become familiar with as you get started with the implementation of the experiment is the Action Plan.

* It is located on the homepage of the website under the Implementation and Experiment Tab. It is the first link (titled Action Plans).
* Each Experiment has an Action Plan. The Action Plans were designed to assist the school with identifying the Action items needed to properly administer the experiments.
* Also, the Tab entitled Experiments is where you can find a listing of the schools participating in the experiments and the Tab entitled How to Apply is where you find the Dear Colleague Letters & Electronic Announcements.

**Slide 39:**

On this slide we have included a copy of the Action Plan that can be used as a resource to assist in implementing the experiment. This Action Plan is available on the ESI website. Schools can use this document to ensure that all policies and procedures are developed and implemented as required.

**Slide 40:**

This slide shows the 2nd page of Action Plan.

We hope you will take the time to review this Action Plan to assist with successful implementation of the experiment.

**Slide 41:**

Now, let us review your next steps to begin participation in the Second Chance Pell Experiment. This implementation checklist provides important steps that must occur in order to continue to participate in the experiment.  Some of the steps must occur before disbursing aid, while others must be part of your office policies and procedures.

As we mentioned earlier, your school must have a countersigned amended PPA before you can begin participating AND disbursing aid under the experiment. Once countersigned, the institution’s Welcome Letter will inform the institution of the Federal Pell Allocation. Each year, the Department will reach out to schools asking for estimated expenditures in order to provide Federal Pell allocations for subsequent award years under the experiment.

The institution should be reporting the correctional facility as an additional location if 50 percent or more of the eligible program is offered at that correctional facility.

The institution must work with accrediting agency and the correctional facility to ensure that any programs offered through the experiment are in compliance with all Title IV requirements.

Your institution must have an agreement with the Correctional Facility or facilities to offer one or more Title IV HEA Educational Programs to incarcerated students.

The institution and the correctional facility must have a process in place to ensure credit balances, if any, are disbursed to the student according to Title IV requirements and in conjunction with the policies of the correctional facility.

It is very important that the institution develops and implements policies and procedures according to the specific requirements of the experiment.  You can use the Action Plan document (discussed on the prior slide) to develop and implement policies and procedures.  We cannot stress enough the importance of developing these policies and procedures and consistently applying them.

As mentioned previously, the institution is required to report specific information to Federal Student Aid.  Participating schools should be prepared for the monthly and annual reporting requirement.    Correctional facilities will also have an obligation to share and report information relevant to the experiment.

**Slide 42:**

If you have questions about the Experiment, please send a message to the Experimental Sites mailbox. That mailbox is monitored daily.

Now we would like to introduce VERA. They would like to provide some information about their services on the next slide.

**Slide 43:**

Vera provided a summary of their services as outlined on the slide.

**Slide 44:**

We are available to take questions. If you have a question, please use the Chat feature to ask the question. We will respond to the questions live.

We hope to be able to get to all of the questions today. If your question is not answered, or if you think of other questions after the webinar, you can send them to the ESI mailbox: **ExperimentalSites@ed.gov****.**

Ashley, can we begin responding to some of the questions?

The webinar continued with a Q&A session. We have provided a summary of the Questions and Answers as another attachment. Please refer to the Questions & Answers attachment to review the Questions asked and answered during the webinar. We also refer you to Q&A document for Second Chance Pell that can be accessed via the ESI website: <https://experimentalsites.ed.gov/exp/pdf/SecondChancePellFAQ.pdf>.

Thank you for attending today. If you have questions, please send them to the ESI Mailbox. Have a great day!