Second Chance Pell webinar transcript
May 17, 2022

Welcome to the Second Chance Pell Experiment overview and training, I'm going to pass this off to the director of the Policy Innovation. and Dissemination group, David Musser. Thank you so much, Casey, and thank you to everyone who is joining us today for this training session on the Department of Education Second Chance Pell Experiment. I just want to start today by expressing my gratitude to all of the institutions that are planning to participate or that are already participating in the experiment. In some cases, all the way back to 2016. All of your hard work has taught the department a great deal about what's needed to offer Pell grants in a prison setting in the 21st century. We're still learning a lot from all of your hard work and from the work of your students. This experiment is really important to the department as it provides us with critical information about how the student aid programs can be implemented for students in a prison setting. This is all the more important as we prepare to implement the new statutory provisions that will make Pell grants available to all students who are enrolled in eligible prison education programs starting in July 2023, which you'll hear more about later in this presentation. So we look forward to working with all of you as you build your programs, collect valuable data, and ultimately help your students achieve their educational goals as part of this experiment. None of this could happen without all of you, and we hope that you'll treat us at the experimental sites team as partners as you engage in this work. Thank you. And now I'll turn it over to Ashley to get started with the presentation.

Thank you, David, and welcome everyone to the Second Chance Pell - Pell for students who are incarcerated. training session. My name is Ashley Schuler. I'm one of your trainers today. Also joining me is Michael Cagle and various other members of the experimental sites team or the ESI team for short. All presenters and members of the ESI team will be assisting with the question and answer portion of the training today. You have an opportunity to ask questions using the question and answer feature and we will review and respond to these questions at the end of the presentation. When you ask a question, it will be helpful if you include your school status, and whether you are a new school or a continuing school. We will be recording the session today and we'll post a copy of the presentation to the ESI website soon.

The purpose of this session is to provide guidance to the schools who have been accepted into this experiment. We also welcome schools that are currently participating and hope this webinar will be helpful to you as well. During this webinar we will have a brief overview of the experiment that will generally serve as a reminder of the purpose of this experiment. The statutory and regulatory waivers provided for this experiment, evaluations and expectations, and other important information. We will also introduce experiment participants to VERA who is tasked with providing technical assistance for the experiment. Staff from VERA will be introduced at the end of this session. Our agenda today includes an overview of the experiment including brief explanations of the details included in the Federal Register notice published on August 3rd, 2015. We will discuss the requirements for participating schools, including information on reporting and evaluation We will provide details for successfully implementing the experiment, including the various resources available. Over the next few slides, we'll provide an overview of the 2nd Chance Pell experiment. First, let's talk about implementing the experiments which will require coordination and collaboration amongst various offices on your campus. In the experiment, you will also need to coordinate with the Correctional Facility that you are partnering with. Institutions should view participating in ESI as a collaborative effort, meaning that you will need to work with other offices at your institution, including but not limited Business Office, faculty, registrar, admissions, communications and the President's office. This is not an exhaustive list, so you may want to think about what are some of the other offices that you may need to collaborate with. Other groups you may partner with will be your accrediting agency, vendors, state agencies and other policy stakeholders. Please keep in mind that the Department of Education is charged with matters pertaining to postecondary education and federal student aid. The function of the correctional facilities. that you partner with for this experiment are not under this jurisdiction of the Department of Education. Correctional facilities would be under the jurisdiction of the Federal Bureau of Prisons or their perspective states whichever is applicable. Although under this experiment schools are exempt from certain parts of the regulations, you are required to adhere to any other Title IV requirements.

You can see the administrative capability 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 and procedures related to this experiment. You may 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 that will assist you with successful implementation of this experiment will be critical to your success.

Let's review some of the objectives of this experiment. The experiment will examine how waving 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 postsecondary institutions administration of the title IV HEA programs to incarcerated students. Specifically, we're interested in reviewing how receiving Pell Grant funds impacts incarcerated students, examining any challenges related to the availability use and administration of federal TitleIV funds. We may also consider other elements such as academic programs and credentials that students pursue, as well as the time to degree and rate at which they're able to complete their program. Specific elements of data collection, evaluations and outcome measurements will b determined as we continue collaborating with different stakeholders.

So what does participation in these 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 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. Schools should focus on the date the student is eligible for release instead of trying to determine an actual release date. It is important to note that we state the students are otherwise eligible for Pell for federal Grants. We state this because this experiment only waived the statute that prohibits students incarcerated in federal or 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 the FAFSA, being a U.S. citizen or eligible noncitizen, 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 the student eligibility requirement, there are potential alternatives that postsecondary institutions may want to consider to assist their students should they find that the high school diplomas or their equivalent presents a significant barrier. We will discuss this later in the presentation.

Now in terms of waivers, let's look at what specifically the experiment waves under the current rules. Amongst other limitations that may cause the student to be ineligible for Pell Grant, there's 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 waves section 401b(5) of the Higher Education Act and 34 CFR 668.32 (c)(2)(ii) of the regulation. Now for the provisions that are not waived and we have some updates for you as well as it pertains to the FAFSA Simplification act. So the experiment did not waive Section 484(r) of the Higher Education Act. A student who is convicted of any offense under federal or state law involving the possession or sale of a controlled substance for conduct that occurred during a period of enrollment for which a 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 for the date of the conviction for the period of time specified. However, this requirement was eliminated in the FAFSA Simplification Act and is no longer a requirement for Title IV purposes as of the 2021-2022 award year. In addition, this experiment did not waive the provision in section 401(b) (6) of the Higher Education Act that prohibits individuals subject to an involuntary civil commitment upon completion of a period of incarceration for forcible or non forcible sexual offenses from receiving federal Pell Grants. However, this provision was eliminated in the FAFSA Simplification Act. The act strikes section 401 (b)(6), that prevented institutions from awarding Pell grants to any individual who is incarcerated in any federal or state penal institution or who is subject to any involuntary civil commitment upon completion of a period of incarceration for a forcible or non forcible sexual offense. Otherwise eligible students incarcerated or confined in that manner will qualify for Federal Pell Greens when these provisions are effective. Finally, this experiment does not waive the cost of attendance provision in section 472 (6) that limits the cost of attendance for federal for incarcerated students to tuition fees, and, if required. books and supplies. We will discuss cost of attendance for incarcerated students later in this presentation.

Other student eligibility provisions that are not waived are outlined on this slide. Students participating in this experiment must have a high school diploma or state recognized equivalent, be U.S. citizen or eligible non-citizen, maintain satisfactory academic progress, be a regular enrolled as a regular student in a title IV eligible program, not be in default on a student loan or owe title IV overpayments. When this the experiment began, there was a requirement for males between the ages of 18 and 25 to have registered with the Selective Service in order to receive Title IV. However, the FAFSA Simplifcation Act of 2020 eliminated the requirement for students to register with the Selective Service system as a condition of receiving federal student. aid. This part of the provision was effective on. July 1st, 2021.

On the next few slides, we will provide some specific requirements for this experiment.

Students included in your cohort who receive a Pell Grant under the 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 within five years or less. Again for the purpose of this experiment schools should focus on the date that the student is eligible for the release instead of trying to determine an actual release date.

Another requirement under this experiment is that the students must be able to complete their program post-release if they cannot complete their 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 the before their completion, the school should be able to provide or collaborate with others to offer the student the ability to reenroll and complete the program post release. We also expect schools, as good stewards of federal title IV funds, 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. Another requirement under this experiment is that schools must also ensure that students under this experiment are enrolled in programs that prepare them for careers and 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. And finally, under the 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 students under the experiment are equipped with not only the academic knowledge that the program office offers, but also the aptitude to utilize the knowledge and applicable credentials post release.

This slide serves as a reminder that Pell grants made available to eligible students through the experiment are intended to supplement, not supplant, existing investments in postsecondary prison education programs. Participating schools, correctional facilities, or other entities may not use the Pell Grant funding provided under the experiment to disinvest their own resources. Included in the student eligibility requirements for Pell Grants is a requirement that students have earned a high school diploma or its state equivalent - for example, the GED. The recently redesigned ability to benefit provisions provides special consideration for students without a high school diploma to gain eligibility for Pell grants through eligible career pathways.

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

Thank you, Ashley. And we are on slide number 18. What we'd like to do now is talk a little bit about the program participation agreement that you will soon receive and for those of you who are returning, you probably already - in fact already have received that. So this won't apply to you, but let's take a few minutes and talk about that process. For the new cohort of schools, the PPA amendments will be sent to the President's office in the next few weeks. Actually probably just a couple of weeks from now. So we ask that you please carefully review the PPA amendment and understand your institution’s commitment to participate in this experiment. Now, once the PPA amendment is received by your President's office, your institution will need to obtain the required signatures and return the signed amendment to federal student aid. FSA will then send the school, what we call a countersigned amendment to the PPA, and the school would then keep this countersigned amendment on file on your campus. It's important to remember that your school cannot officially begin participation in this experiment until it receives the countersigned amendment to the PPA. When your school has a fully executed amendment to your PPA, which we call the PPA amendment for the experiment, you will receive a welcome letter from the ESI team and this will inform your institution that you may begin implementation of the experiment and we'll also include the amount of Pell that the school is able to disburse under the experiment for the award year. We anticipate that this new cohort of schools will be able to begin during the 2022-2023 award year, which begins this July. As we mentioned, the school participation division will be sending all the new schools their PPA amendment in the next two weeks. So please be on the lookout for this and for, like I mentioned earlier, for current schools you already have your fully executed PPA on file and your institution will receive an allocation for the 2022-2023 award year in the next few weeks and we'll discuss the allocation process in just a couple of moments.

Let's move on to slide number 19. We're going to spend a few minutes talking about credit balances on the next few slides. We understand that schools and correctional facilities might be concerned about Title IV aid credit balances. A credit balances occurs when the total Title IV financial aid in this case Pell grants, that is disbursed to students exceeds the students total institutional charges. When this occurs, schools must disburse the credit balance to the student. However, under the experiment, the students cost to attend the academic program, as Ashley mentioned a little bit earlier, 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 students books and supplies. In these cases. since the books and supplies costs are considered allowable educational costs then depending on the students Pell Grant eligibility, the school may be required to provide a credit balance to the student. Now, if the students 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 will need for their program. However, there is an opportunity to avoid these credit balances and we're going to discuss this on the next slide. So let's move on to slide number 20.

To avoid credit balances to your students your institution may want to consider making books and supplies part of your institutional charges. Now, as we mentioned, under the 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 the school chooses to do this, they must ensure that their books and supply costs are reasonably competitive to the best market price.

We'll move on to slide number 21. OK, even if schools include books and supplies as part of their tuition and fees, there may be rare instances when that cost does not exceed the students Pell Grant eligibility, which results in a credit balance. However, credit balances under these circumstances will be avoided under the experiment as schools are directed to adjust the students 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, federal student aid should only be used to cover educational costs. As we mentioned, for students under the experiment, educational costs are limited to direct institutional charges. tuition and fees, and, if included books and supplies. Let's explain this further on the next slide. Let's move on to slide number 21 or 22. Now we're on slide 22.

On this slide, you can see an example of how Pell disbursements should occur under this experiment. Now the amount of student of a students Pell Grant Award is a function of the students expected family contribution which we call EFC and the students cost of attendance. As you can see on the slide, ranges of each of those factors are displayed on the two axises of the 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 the difference between the two factors. For example, the award for a student with an EFC of zero and a cost of attendance of 1814 in which the 1814 represents 1700 for tuition and fees, and 114 for books and supplies, would be where the EFC column of zero meets the cost of attendance row of 1800 to 1899. That intersection would result in an award of $1850. However, since the institutional cost of 1814 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's within the Pell scheduled disbursement, schools will need to monitor their awards and disbursements to ensure they do not exceed these educational costs.

Alright, let's move on to slide number 23. As you can see here, 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, let's say a Pell Grant award for a student with an EFC of 0 and a cost of attendance of 1875 would be where the FCC column of zero meets the cost of attendance row of 1800 to 1899 and that intersection would result in an award of 1850. However, even though the institutional cost of 1875 is more than the Pell Grant award amount, even though the student has further educational costs, the schools should not increase the Pell disbursement to 1875 because it exceeds the Pell Award of 1850, per the Pell schedule. So it's really important to pay close attention to the Pell schedule when you're awarding your student under the experiment.

Let's move on now to slide #24. OK, let's 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 should still be able to complete the FAFSA using the online FAFSA on the web. Students under the experiment will complete the same FAFSA as the other students, meaning that there is no special FAFSA. Students without access to the Internet have the option to complete a paper FAFSA, and postsecondary institutions under the experiment will need to utilize the PDF version of the FAFSA and bring copies to provide to students. Schools may want to also consider having the student complete and sign the paper FAFSA, which the school then uses to input the students FAFSA through FAA access to CPS online. Now our 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 the experiment - those incarcerated in the federal and state penal institutions should adhere to the same guidance to ensure that students receive all the documents related to their eligibility which would include things like student aid reports, award letters, notifications, verification requests if the student selected, and any other information that's related to determining the students eligibility.

Alright, let's move on to slide number 25. And let's discuss students who withdraw and how this would impact R2T4. Since the entire Pell Grant award would have gone to pay institutional charges, there would be no circumstance where the student would be liable to repay any portion of an award even under withdrawal. Now we understand that this experiment presents a special consideration regarding R2T4 or withdrawal calculations. So 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 a program for two weeks because of a disciplinary or a safety issue? Now, if the school expects a 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 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.

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 provide a link to this information later in the presentation.

Alright, let's move on now to the next slide, slide number 26. Let's turn our attention to the required agreements between possecondary institutions and the Correctional Facility. For purposes of this experiment, generally the agreement between the school and the correction facility is just that. It's an agreement between the school and the Correctional Facility. However. based on our meetings with stakeholders, including the Department of Justice, there are few things that schools may want to consider as they move forward. Let's talk about those here. You might want to consider including in your agreements not only your needs of the 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 from the Department of Education seeks to collect related to the experiment is the data that the institution would have since it's related to awarding in the 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're going to discuss the evaluation process later in this presentation, which would include the information required for reporting.

Let's move on now to slide #27. Schools may also want to consider including a policies and procedures manual or a resource guide of some sort of how the academic program would be implemented at the Correctional Facility. This includes things like how behavior affects program participation. Incarcerated student limitations, Correctional Facility procedures. and responsibilities, and the incarcerated student responsibilities, just to name a few.

Alright, on slide #28 let's talk a little bit about additional locations. This is extremely important information. Generally, if 50% 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 under the E-App (that's the electronic application to participate that many of you are familiar with). The procedures for reporting and the requirements related to reporting additional locations are not waived under the experiment. So as a reminder, additional locations must be accredited by your state and or your accrediting agency. More information on additional location requirements can be found in the federal regulation. And you can see that we have 34 CFR 600.21 (a)(3), which discusses the requirement to report to the department accredited and licensed additional locations within 10 days. Then also 34 CFR 600.21 (d) which discusses the disbursement rules related to additional locations. And finally 600.20 (c)(1) discusses the circumstances when a school must wait for the department approval before disbursing title IV aid Aat accredited and licensed additional locations. There's a lot of great information and helpful information also included in the federal Student Aid Handbook, which would be in volume two, Chapter 5 related to the subject. Schools that will offer 50% or more of an eligible program at the Correctional Facility should really begin the accrediting agency and state licensing approval process for that now. The timeline for that process can vary depending upon the accreditor. And once the accreditor and state licensing approvals are granted, the school can then report the additional locations to the department and work with your 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. I think it's really important to stress this slide on slide number #28 here because it is important that schools participating in the experiment, if you are having a program or 50% or more of your students who can complete at the correction facility, you really need to make sure that you report that as an additional location.

Alright, let's move on to slide #29. Now, many schools offer programs at the correctional facilities via distance education. Our current policy guidance is that a location where 50 percent or more of the eligible program is offered at the institution (even if the mode of instruction is distance education) must be reported as an additional location. In addition, schools should keep in mind that since incarcerated individuals must be able to complete their program, they must have the opportunity to complete the program while incarcerated or once they are released.

Let’s move on to slide #30. 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.

Let’s move on to slide #31. 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. So just a reminder to periodically go out there and visit the website to get this type of information as well as other helpful information about the experiment.

Alright, let's move on to the next slide which is slide number 32. As a participant in the Second Chance Pell experiment, we recognize that schools have experienced 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 and that prohibition remains. 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. 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. More information can be found by visiting the Knowledge Center COVID-19 page.

Alright, let's move on now to the next slide. Which is slide #33. We encourage you to review the electronic announcements and other guidance, as I mentioned, related to COVID-19. The Department has provided various guidance related to the unique challenges that schools have faced with the COVID 19 pandemic including leaves of absence, and R2T4 when COVID-19 resulted in interruptions of study. So it's important to note that the COVID-19 national emergency is still in effect and our current COVID-19 flexibilities remain in place. So in the context of second chance Pell, the waivers and relief applicable to all programs due to the COVID-19 also apply to the Second Chance Pell programs and we provide a link to the guidance for your view on this slide here as you can see.

Let's move on to the next slide, which is slide number 34. Let’s spend a few minutes discussing the FAFSA Simplification Act and how it impacts incarcerated students. Once the new requirements are implemented on July 1, 2023, students incarcerated in federal or state penal institutions and students who are subject to involuntary commitments will be eligible to receive Pell Grants. The law also ties the Pell eligibility to enrollment in an eligible prison education program. In addition, it creates a new definition of a “prison education program” and adds specific requirements for approval, reporting, oversight, and evaluation of such programs. Finally, it requires the Department to publish an annual report on incarcerated students and provide information about impact of the newly-defined prison education programs.

Let's move on to slide #35. The negotiated rulemaking is still in progress. and the subcommittee has developed draft regulations in October and November of last year, 2021 and the main committee did reach consensus on December. 10th, 2021, so consensus was really reached on this particular topic. The Department will publish consensus language as an NPRM and the public will be able to comment and ask for clarification on any aspect of the proposed rules. And, prior to the publication of this NPRM, the department cannot respond to inquiries or comments on the consensus language. The publication date of the NPRM is to be determined, but will likely be sometime later this spring.

Alright, let's move on to the next slide which is slide #36. The Department will publish a final rule later this fall by November 1st, 2022. Responses will be open to public comment and the department will respond to comments received by the public and make changes based on those comments, despite reaching consensus on the proposed regulations. The law requires implementation by July 1st, 2023. The experiment will continue through the 2022-2023 award year and the department will provide more information for Second Chance Pell schools as they transition from the experiment to the new provisions for incarcerated students. You can on the slide here you can view the consensus language and the latest updates on the ED website and the link is provided on the slide. So if you have a few moments I highly recommend you go out there and review that when you have some time.

OK, let's move on to slide #37. Alright, let's talk a little bit about fresh start for defaulted borrowers. As you may have already seen, when the department announced the new cohort of schools for the experiment, we mentioned fresh start for defaulted borrowers. In the near future, the Department plans to eliminate the impact of delinquency and default on all borrowers including incarcerated students, and allow them to reenter repayment in good standing. After the “fresh start” is implemented, the Department will also allow incarcerated individuals to consolidate loans to get out of default status. More information will be provided to participating schools as it becomes available on this topic, so stay tuned for that.

Alright, let's take a few minutes to discuss the reporting and evaluation requirements under the experiment. And that's on slide #38 and we can move on to slide #39.

Alright, so first of all reporting and evaluation – FSA is trying to minimize the reporting burden imposed on participating schools. Reporting will focus on experiment specific information. There will be 2 parts to the evaluation process. The first part schools participating in the experiment will be asked to complete an annual survey and this survey will collect information such as postsecondary level instruction offered prior to the experiment, if any was offered, the institution's partnership with penal institutions and any unforeseen challenges, and aspects of the institutions arrangements, for example, tuition and fees, any caps on credits earned support services provided, instructional delivery methods and faculty characteristics. These are the type of things that will be collected on the annual survey, which will be sent to each participating institution in the fall of each year.

OK, let's move on to slide #40. So in addition to the survey, let's discuss the additional information that will be collected. Now 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 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 the information by collecting personal identifiers for students who are part of the experiment, and the institution will upload this information using the ESI reporting tool within COD. We'll discuss this on the next slide.

And we can go on now to that slide which is slide #41. The department has developed, as we mentioned a little bit earlier, a reporting tool within COD to collect evaluation data. There is a template available in COD in the form of an Excel spreadsheet. Institutions will download this spreadsheet in order to report both the monthly expenditures and the final report each year. All participating schools are required to report monthly expenditures and for the monthly reporting, schools will complete only the 1st five columns on 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 also be required to upload a final spreadsheet at the end of each award year with all the columns completed for each student who was part of the experiment during the award year as soon as possible after the award year ends and the department will reach out to our all the schools once this final Excel spreadsheet is due. So you're going to get plenty of notice and plenty of assistance to help you through that process. Each year, the department will provide a workbook posted to the ESI website that includes instructions for the upload process and other helpful information that will assist you with the upload process, as well as your evaluation process. The department will review the information submitted by participating schools and conduct the experiment wide analysis and a report will be developed that outlines the results of the analysis conducted by the department.

Alright, let's move on to slide number 42. And let's talk about the Pell Grant expenditure caps. I think it's important for us to spend a couple of minutes talking about the process for determining the allocations that each individual school can spend on under the experiment. Now for the new cohort of schools the ESI team will reach out to you via email to request your estimated cost of attendance figures for your program in the experiment as well as the request for the updated estimated number of students you plan to enroll under the experiment during the upcoming 2022-2023 award year. Please complete and return your responses to the ESI team following the instructions that you'll receive via email later this week actually. Once we receive your responses. and your institution has a fully executed program participation agreement we'll provide each new school with a welcome letter as I mentioned earlier, that will include the experimental allocation for the 2022-2023 award year. For returning schools that are attending today, we have received your allocation request as well and the department will provide your 2022-2023 allocations within the next few weeks. It's important to note that, for all schools, they you really need to monitor and alert the Department of Education if you believe that you will exceed your allocation amount. So when the department issues you an allocation amount, you must not go over that amount. If you do believe you're going to exceed that amount, it's important for you to alert us of that. Schools are not permitted to disburse Pell over the amount allocated and should contact the ESI team if you feel you will exceed your allocation. 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, I can't stress enough how important it is for schools to ensure timely reporting of disbursements to COD, timely monthly reporting of expenditures, as well as compliance with the end of the year reporting requirements that we have in place for the experiment.

Alright, let's move on to slide #43 and talk about some of the resources that will assist participating schools as you begin implementing the experiment. On slide #44, the next slide here the experimental sites website is a useful resource that you should all become familiar with and access it frequently to assist you with the implementation of your experiment. The Web address is located on the top of the of this slide and 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's located on the home page of the website under the implementation and Experiment tab, and that's the first link - it's titled action plans. That action plan we're going over in just a couple of minutes. It provides some great information that helps you get started and continue your requirements under the experiment. Each experiment does have an action plan and these action plans were designed to assist the school with identifying the action items that are needed to properly administer all the experiments, including the Second Chance Pell experiment. There's also a tab entitled experiments, and that's where you can find a listing of all the schools participating in the experiments - and the tab, how to apply is where you would find the dear colleague letters and electronic announcements just in case you want to revisit any of the dear colleague letters related to the experiment or electronic announcements. You can go right there to that how to apply tab on the website and that will be where you find that information.

Alright, let's move on to slide #45. On this slide, we've included a copy of the action plan that can be used as I mentioned as a resource to assist in implementing the experiment. This action plan is available on the website and schools can use this document to ensure that all policies and procedures are developed and implemented as required. And you can see on this slide #45. it's kind of hard to read, but this particular action plan is available and this is the first page of the action plan. If we move on to the next slide, which is slide number, I think it's slide #46. This shows the second page of the action plan. And again, we hope you'll take the time to review this action plan because it does include some great information to help you successfully implement the experiment.

All right, let's move on now to the next slide. Slide #47. We have a checklist here and 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. And as I mentioned earlier, your school must have a countersigned PPA before you can begin participating and dispersing aid under the experiment. As we mentioned, the PPA amendments for the new schools will be sent within the next couple of weeks, so be on the lookout for that. The institution should be reporting the Correctional Facility as an additional location if 50% or more of the eligible program is offered at that Correctional Facility. The institution must work with the 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 each Correctional Facility where you will offer title IV eligible programs to your incarcerated students. Your 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's very important that the institution develops and implements policie and procedures according to the specific requirements of the experiment and as we previously mentioned, the institution is required to report specific information to federal student aid and participating schools should be prepared for the monthly and annual reporting requirement. So now I would like to introduce Ruth Delaney from VERA.

Thank you, Michael. I am Ruth Delaney. I am the associate director at VERA for our project called unlocking potential, which includes working with all of you who have been selected to be part of this experimental sites initiative run by the Department of Education. So in this role, VERA, which is a national nonprofit that works directly with government partners to drive effective policies and practices using research and emerging best practices. We provide technical assistance to the colleges and corrections agencies that have been selected to participate in second chance Pell. To do this, we provide our assistance to you. I do want to mention because this is sometimes a new kind of assistance for college partners. This assistance is free to you. Our help and support is something that comes along to you accompanied with your selection for this ESI. So what technical assistance includes? There's a quick description here on this slide. Dedicated subject matter experts who provide direct hands on and tailored technical support to navigate challenges, improve quality and expand programming, industry leading reports and toolkits, including some information about what we have learned thus far about actually using financial aid in correction settings, learning opportunities with national experts and, networking opportunities with second chance Pell peers. If you have not yet heard from someone at VERA through email, please do reach out. I don't have my email address on this slide, but it is RDelaney@VERA.org. That's RDelaney@VERA.org and we'll be in touch with you to help you think through how to get started, what you might want to learn before you get going and brainstorm ways to engage with your corrections partner. Thank you so much to the Department of Education for giving me the opportunity to speak to all of you on this webinar. And if you have any questions about our role, please do put them in the chat and we will get back to you and. I will hand this over to Caroline.

The remaining part of the presentation was questions and answers. A Second Chance Pell Q&A document is available on the ESI website: <https://experimentalsites.ed.gov/exp/pdf/SecondChancePellFAQ.pdf>.

Thank you for your attendance.