

The Department of Education's  
*Experimental Sites Initiative*

**Second Chance Pell:  
Pell for Students Who Are Incarcerated**

# Welcome to the Second Chance Pell Experiment



# Agenda

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- Overview of Experiment

2

- Requirements

3

- Implementation

# Responsibilities of Institutional Offices



**Administrative Capability**  
**668.16(b)(1) and (4)**

# Second Chance Pell

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## Objective

- Examine how providing Pell Grants to incarcerated students influences their participation in educational opportunities and academic outcomes
- Examine any challenges or obstacles to an institution's administration of Title IV HEA programs to incarcerated students

# Second Chance Pell

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The experiment will allow participating schools to provide Federal Pell Grants to otherwise eligible students who are incarcerated in Federal or State penal institutions, and will be eligible for release into the community; particularly those who are likely to be released within five years of enrollment in the program

# Second Chance Pell

## Waivers

Law/Regulation	Description
Section 401(b)(6) of the HEA	Provides that students who are incarcerated in a Federal or State penal institution are not eligible to receive Federal Pell Grant funds.
34 CFR 668.32(c)(2)(ii)	For purposes of the Federal Pell Grant Program— ...Is not incarcerated in a Federal or State penal institution;

# Exceptions

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The following provisions are not waived:



- Convictions for drug possession or sale while receiving title IV aid (Section 484(r) of the HEA)
- Involuntary civil commitment after incarceration for sexual offenses (Section 401(b)(6))
- Cost of attendance provision for incarcerated students (Section 472(6))

# Exceptions

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All other student eligibility provisions apply and are not waived:



- High school completion
- Citizenship
- Satisfactory Academic Progress
- Regular Student
- Defaults and Repayments
- Selective Service

# Requirements

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Student Consideration: Likely To Be Released within Five years



Likely to be released?



Is 5 years a “hard release”?

# Requirements

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Completion of Program



Must be able to complete program  
post release

# Requirements

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## Employment



Must ensure students are not enrolled in a program that prepares them for careers in fields where they face legal barriers to employment.

# Requirements

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## Academic and Career Guidance



Must provide academic and career guidance

# Requirements

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Supplement NOT Supplant



This experiment is intended to supplement not supplant existing investments in postsecondary prison-based education programs

# Requirements

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## ATB/Career Pathway Provisions



Students without a high school credential and the Career Pathway provisions

See [Dear Colleague Letter GEN-15-09](#)

# Program Participation Agreement



**FSA sends the school the Amendment to the PPA**

**School signs and returns hard copy document via delivery service**



**FSA sends the school a countersigned amendment to the PPA and a welcome letter**

- School retains copies of both of those documents for their records

# Title IV Credit Balances

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- Occurs when the total Title IV financial aid disbursed to a student exceeds the student's total institutional charges.
- Title IV credit balances are paid directly to the student
- For this experiment, need to avoid credit balances to students –

# Title IV Credit Balances

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- To avoid credit balances to students –
  - Books and Supplies can become part of institutional charges
    - Schools provide books and supplies directly to students.
    - Costs of books and supplies are included in the amount of tuition and fees.
      - Costs of books and supplies must be reasonably competitive to best market price.

# Title IV Credit Balances

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- To avoid credit balances to students –
  - Pell Grant Calculation
    - Adjust award amount from Pell Grant Payment Schedules to eliminate credit balances

# Title IV Credit Balances

## Elimination of Credit Balances

- The amount of a student's Pell Grant is determined using the student's Expected Family Contribution (EFC), the student's Cost of Attendance (COA), and the Pell Grant Payment Schedule.
- Example: Total of tuition and fees and books and supplies is \$1,814.

Cost of Attendance			EFC
			0
			To
			0
1800	-	1899	1850

- For this experiment, the Pell Grant award must be reduced to \$1,814 to meet only the student's educational costs.

# Title IV Credit Balances

## Elimination of Credit Balances

- The amount of a student's Pell Grant is determined using the student's Expected Family Contribution (EFC), the student's Cost of Attendance (COA), and the Pell Grant Payment Schedule.
- Example: Total of tuition and fees and books and supplies is \$1,875

Cost of Attendance			EFC
			0
			To
			0
1800	-	1899	1850

- Pell Grant award is \$1,850 and not \$1,875.

# Applying for Aid

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- Process for Completing the FAFSA
  - Online if available – [FAFSA.ed.gov](https://fafsa.ed.gov)
  - Print PDF version of FAFSA for students to complete – [FAFSA.ed.gov](https://fafsa.ed.gov)
  - Enter student information using FAA Access to CPS Online – postsecondary institution
- Student Notification of Aid Eligibility
  - Student Aid Report
  - Award letters/notification
  - Verification

# Student Withdrawal - R2T4

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- Student does not complete the payment period
- Possible Reasons –
  - Student withdraws
  - Student is released from the facility
  - Correctional facility withdraws the student
  - Correctional facility suspends program
  - Correctional facility ends program
- Regular R2T4 rules apply
  - School may need to return a portion of the Pell Grant funds

# Agreement Required

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- An Agreement between the postsecondary institution and the correctional facility
- Consider including in the agreement what is needed for the programs and what will be expected of each of the participants
  - School
  - Correctional Facility
  - Students

# Agreement Required

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- Consider including policies and procedures manual or a resource guidance of how the academic program would be implemented in the correctional facility including-
  - How behavior effects program participation
  - Inmate limitations
  - Correctional facility procedures and responsibilities
  - Inmate responsibilities

# Additional Location(s)

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- Schools must report the correctional facility as an additional location if-
  - 50 percent or more of an eligible program is offered at the correctional facility
- Refer to: 34 CFR 600.21(a)(3), 600.21(d) and 600.20 (c)(1) as well as the FSA Handbook, Volume 2, chapter 5

# Reporting and Evaluation

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## Participating institutions will be required to:

- Complete annual surveys collecting information about:
  - Postsecondary instruction (if any) provided to incarcerated population(s) prior to participating in the experiment
  - The postsecondary institution's arrangement(s) with correctional facilities and any unforeseen challenges
  - Aspects of the postsecondary institution's arrangements (e.g., tuition and fees, caps on credits earned, support services provided, instructional delivery methods, and faculty characteristics)

# Reporting and Evaluation

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## Information to be collected for evaluation:

- Number and characteristics of incarcerated students who completed a FAFSA in anticipation of participating in the experiment
- The number who actually enrolled
- The number of postsecondary credits students attempted and the number earned
- The amount of Federal Pell Grant awarded and disbursed to each student
- Indicators of academic progress, including program completion

# Possible Evaluation Data

Information about:	Possible Data Sources
<b>Participating Postsecondary Institution</b>	<ul style="list-style-type: none"> <li>▪ Integrated Postsecondary Education Data System (IPEDS)</li> <li>▪ Institutional Experimental Site Survey and Narrative Descriptions</li> </ul>
<b>Postsecondary Program(s)</b>	<ul style="list-style-type: none"> <li>▪ Institutional Experimental Site Survey and Narrative Descriptions</li> </ul>
<b>Potential Postsecondary Students (Incarcerated individuals completing a FAFSA)</b>	<ul style="list-style-type: none"> <li>▪ Institutional Student Information Record (ISIR) Data</li> <li>▪ Common Origination and Disbursement (COD)</li> <li>▪ National Student Loan Data System (NSLDS)</li> <li>▪ Personal identifying information (PII) of individuals affected by experiment</li> <li>▪ Course taking and other student-specific information not already reported elsewhere</li> </ul>

# ESI Reporting Tool

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- Timeline
  - Fall 2017 for the 2016-2017 award year
- ESI Reporting Tool
  - Schools upload
    - Student identifying information
    - Experiment specific Information
- FSA
  - Conducts experiment-wide analysis
  - Provides participating schools analysis of their data

# Pell Grant Expenditures Caps

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- Institutional cap for award year number of students and expenditures
  - School monitoring
    - Monitor to identify if enrolled student and Pell Grant disbursements will exceed estimates
    - Alert the Department of Education if enrollment and Pell Grant disbursements appears as if it would exceed estimates
  - U.S. Department of Education Monitoring
    - Timely reports of Pell Grant disbursements by schools

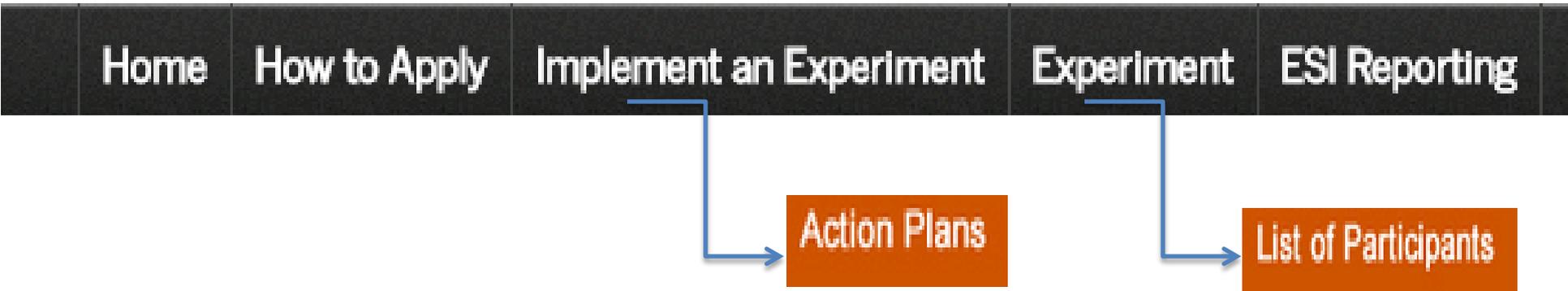
# VERA Convening

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- July 19 VERA Convening
  - Brought together knowledge based resources
  - Discussed independent researchers

# Experimental Sites Initiative Website

<https://experimentalsites.ed.gov>



# Second Chance Pell Action Plan

Project Lead:	
Action	Status
<b>Eligibility</b>	
<ul style="list-style-type: none"> <li><input type="checkbox"/> Signed Amended Program Participation Agreement (PPA) on file</li> <li><input type="checkbox"/> Attend available training webinars</li> <li><input type="checkbox"/> Train applicable staff at institution</li> </ul>	
<b>Consumer Information</b>	
<ul style="list-style-type: none"> <li><input type="checkbox"/> Identify all Consumer Information documents and web pages that require updates</li> <li><input type="checkbox"/> Schedule Changes</li> <li><input type="checkbox"/> Make changes</li> </ul>	
<b>Establish record keeping system to support evaluation</b>	
<ul style="list-style-type: none"> <li><input type="checkbox"/> Create and maintain a database containing the information requested for the evaluation of the experiment</li> </ul>	
<b>Policies and Procedures</b>	
<p>Develop policies and procedures to ensure that the institution: :</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Partners with one or more Federal or State correctional facilities to offer one or more Title IV HEA eligible academic programs to incarcerated students</li> <li><input type="checkbox"/> Works with the partnering correctional facilities to encourage interested students to submit a FAFSA</li> <li><input type="checkbox"/> Only disburses Pell Grant funding to otherwise eligible students who will eventually be eligible for release from the correctional facility, while giving priority to those who are likely to be released within five years of enrollment in the educational program</li> <li><input type="checkbox"/> Only enrolls students in postsecondary education and training programs that prepare them for high-demand occupations from which they are not legally barred from entering due to restrictions on formerly incarcerated individuals from obtaining necessary licenses or certifications required for those occupations</li> <li><input type="checkbox"/> Discloses to interested students and to the Department information about any portions of a program of study that, by design, cannot be completed while students are incarcerated, as well as the options available for incarcerated students to complete any remaining program requirements post-release</li> </ul>	

# Second Chance Pell Action Plan

## Experimental Sites Action Plan

Action	Status
<b>Policies and Procedures (continued)</b>	
<ul style="list-style-type: none"> <li>❑ As appropriate, offers students the opportunity to continue their enrollment in the academic program if the student is released from prison prior to program completion</li> <li>❑ Informs students of the academic and financial options available if they are not able to complete the academic program while incarcerated. This includes whether the students can continue in the program after release, transfer credits earned in the program to another program offered by the institution, or transfer credits earned in the program to another postsecondary institutions</li> <li>❑ In partnership with Federal or State correction facilities, the institution also submits their plans for providing academic and career guidance, as well as transition services to their incarcerated students to support successful reentry</li> <li>❑ Ensures that Pell Grant funds made available to eligible students through this experiment supplement, and do not supplant existing investments in postsecondary prison-based education programs by either the institution, the correctional facility, or outside sources.</li> </ul>	
<b>Systems</b>	
<ul style="list-style-type: none"> <li>❑ Identify affected institutional systems such as processing and disbursement</li> <li>❑ Plan for and make needed adjustments</li> </ul>	
<b>Impact on other Offices</b>	
<ul style="list-style-type: none"> <li>❑ Coordinate with other offices such as Financial Aid Office, Admissions, Bursar, Registrar, Academics and Accrediting Agency</li> </ul>	
<b>Reporting</b>	
<ul style="list-style-type: none"> <li>❑ Complete and submit a reporting template that will include a narrative description and evaluation of the implementation of the experiment.</li> </ul>	

Helpful resources when revising policies and procedures:

[Link to ESI Q & A](#)

# Implementation Checklist

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- Countersigned PPA
- Eligible Programs
- Agreement b/w prison and post secondary institution
- Processing and Disbursement of Title IV aid (credit balances)
- Updating Policies and Procedures
- Reporting

# Contact Information

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# Questions and Answers