



PELL FOR INCARCERATED STUDENTS WORKING GROUP REPORT

Introduction

The 1994 Violent Crime Control and Law Enforcement Act put in place a ban on Pell Grant eligibility for incarcerated students, greatly restricting their access to higher education. The Consolidated Appropriations Act, 2021 signed into law in December 2020 lifted this ban, restoring Pell Grant eligibility and expanding postsecondary access for millions of incarcerated students across the country. As the Department of Education (ED) works to implement these provisions, which will take effect on July 1, 2023, it is critical to develop solutions that address the unique challenges experienced by incarcerated students navigating the financial aid application process.

Although Pell Grants have not been widely available to incarcerated students since 1994, there is existing insight into the areas within the Title IV application process that have proved most challenging for incarcerated students to navigate, which should be used to inform the implementation of these new provisions. Since its launch in 2015, ED's Second Chance Pell Experimental Sites Initiative has enrolled nearly 17,000 incarcerated individuals and resulted in more than 4,500 earned certificates, postsecondary diplomas, associate degrees, and bachelor's degrees. The pilot program, which provides Pell Grants to people in state and federal prisons, has been expanded to 130 schools located in 42 states and the District of Columbia.

While the results of Second Chance Pell have been overwhelmingly positive, the experiment has also illuminated a number of challenges experienced by incarcerated students when completing the FAFSA to determine aid eligibility. These challenges, many of which were outlined in a March 2019 Government Accountability Office (GAO) report, found that completing the FAFSA can be particularly challenging for incarcerated students due to a range of factors, including lack of access to personal files and tax records needed to report and verify applicants' income and assets, difficulty rehabilitating defaulted federal loans, and limited access to phone and email to obtain and communicate with family members about necessary documentation, to name a few.

Although new challenges will likely arise as Pell Grants and postsecondary education options become more widely available to incarcerated students, developing solutions to the challenges already identified by the Second Chance Pell experiment must also be a key focus of ED's implementation efforts. While it is important to note that some challenges identified during the pilot, such as difficulty navigating the Selective Service registration requirement, will be alleviated by other provisions included in the bill, the need will remain for additional ED guidance to provide the aid community with necessary flexibility and clarification to support incarcerated students with FAFSA completion and verification.

Purpose

The National Association of Student Financial Aid Administrators (NASFAA) convened a working group of members and individuals knowledgeable of the Second Chance Pell pilot to examine the challenges, both existing and future, that incarcerated students may face throughout the FAFSA completion and enrollment processes. In addition to identifying considerations for institutions who may consider offering Prison Education Programs (PEPs), including lessons learned through Second Chance Pell, the group developed recommendations for Congress, the Department of Education, and NASFAA to support a smooth implementation that promotes postsecondary access and success for this important population.

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Recommendations for Congress and the Department of Education

As the higher education community works to implement Pell Grant restoration, developing solutions to both the challenges identified during the Second Chance Pell experiment and new challenges that arise during the implementation must be a key focus of the Department of Education (ED).

Fortunately, a number of issues identified during Second Chance Pell (SCP) are expected to be mitigated thanks to other provisions included in the FAFSA Simplification Act and a number of departmental initiatives announced since the bill was passed, including several of the biggest challenges related to FAFSA completion and verification. For example:

- Many SCP students struggled with the FAFSA questions on Selective Service registration and drug conviction eligibility requirements. Both of these questions, along with their related eligibility criteria, were eliminated in the FAFSA Simplification Act and have already been early implemented by ED.
- Rehabilitating defaulted loans has been one of the most significant obstacles during SCP. ED's recent announcement of the [Fresh Start](#) initiative is expected to mitigate this issue for many incarcerated students (see Recommendation 8 below).
- ED [announced](#) in September 2021 that it would be removing high school completion status as a verification item under the V4 and V5 tracking groups beginning in 2022-23. Obtaining documentation to verify high school completion status for incarcerated students has been a significant challenge for SCP students.
- ED indicated in [Dear Colleague Letter GEN-22-09](#), published in July 2022, that incarcerated students will be exempt from income verification requirements and will be subject only to identity verification and submission of the Statement of Educational Purpose. A new Institutional Student Information Record (ISIR) flag will be added to identify students who are confined or incarcerated, which will be populated either by ED comparing the applicant's address on the FAFSA to its correctional facilities database; by the applicant filing the Incarcerated Applicant Form (Incarcerated FAFSA), which will go to a different P.O. Box and zip code than the standard FAFSA; or by the financial aid administrator setting the flag upon determining the student is incarcerated. Income verification has been very challenging during SCP, so exempting incarcerated students from this verification requirement will have a great impact.

Although these improvements address a number of barriers experienced by students during SCP, challenges remain. The working group offers the following recommendations for Congress and the Department of Education to ensure the financial aid process, including FAFSA completion and verification, is as smooth as possible for incarcerated students.

Recommendation 1: Provide institutions with guidance to assist in developing accurate cost of attendance (COA) for incarcerated students.

Recommendation 1A: Maintain the Second Chance Pell policy that any Pell Grant funds in excess of direct costs included in the COA (which can only include tuition and fees; books, course materials, supplies, and equipment; and the cost of obtaining a license, certification, or a first professional credential) must be returned to ED and not be issued to students directly.

Rationale: Returning any Pell Grant funds left over after a student's direct costs have been covered both simplifies the process for students and financial aid administrators (FAAs), and avoids any challenges that may arrive with departments of correction if students were to receive those excess funds directly in the form of a Title IV credit balance. The final regulations on Prison Education Programs (PEPs) published in October 2022 do not allow Pell Grants for PEPs to exceed COA (which for incarcerated students is limited to tuition and fees; required books, course materials, supplies, and equipment; and the cost of obtaining a license, certification, or a first professional credential), thus accomplishing this recommendation. The new regulations would require other aid (such as state grants) to be reduced first in the event that the other aid plus the Pell Grant exceeded the student's COA. If other aid could not be reduced, the Pell Grant would have to be reduced.

Recommendation 1B: Ensure schools are able to develop accurate COAs for PEPs by maintaining the SCP policy that allows institutions to determine that a PEP is a different academic program than a program offered for traditional students, even if the credits and courses are the same.

Rationale: Under current statute and ED guidance, institutions are required to charge the same amount to all students in an academic program, and cannot charge incarcerated students a different amount than what is charged to non-incarcerated students who are enrolled in the same program. During SCP, however, ED issued an [FAQ](#) clarifying that, although students

enrolled in the same program must be charged the same amount, institutions were allowed to determine that a “Second Chance Pell program is a different program than the program it offers traditional students, even if the credits and courses are the same.” Providing schools with the ability to designate a PEP as a different program from that offered to traditional students allowed institutions to develop customized and more accurate COAs for incarcerated students. For example, many SCP programs have built custom COAs that exclude fees not applicable to incarcerated students, and include a standardized charge to cover the costs of required course materials that would otherwise be challenging for students to access. If schools aren’t given the ability to build custom COAs that include a standardized course material charge as an institutional charge, students will not be able to purchase required course materials using Pell Grant funds because they aren’t able to receive Title IV credit balances of Pell funds exceeding direct COA costs, as discussed in Recommendation 1A. ED should maintain this policy to ensure institutions continue to have the flexibility needed to build accurate COAs for PEPs.

Recommendation 2: Modify the Central Processing System (CPS) to allow for a more seamless application process. These modifications should include adding an option for FAAs to print a student’s Student Aid Report (SAR) after submitting the FAFSA through CPS, and better aligning the CPS skip logic and the instructions on the paper FAFSA.

Rationale: Most FAAs use FAA Access to CPS Online to submit incarcerated student FAFSAs to the Office of Federal Student Aid (FSA). As such, FSA should add an option for FAAs to print a student’s SAR (or SAR-like report) after submitting the FAFSA through CPS, which could be used to counsel students. FSA should better align the CPS skip logic and the instructions on the paper FAFSA. For example, the paper FAFSA includes instructions that direct students to skip remaining dependency questions if they were born before a certain date, so many students do not provide that information when completing the paper FAFSA. However, CPS does not include the same skip logic and requires answers to those same questions that students were instructed to skip in order to submit the FAFSA. This causes confusion and delays, as FAAs have to go back to the prison and have students provide that additional information.

Recommendation 3: Remind institutions of existing authorities to assist students who struggle to access personal, parent, or spouse information that is required when submitting a FAFSA or completing verification.

Recommendation 3A: Remind FAAs of their authority to make dependency overrides for students in unusual circumstances.

Rationale: The FAFSA Simplification Act included student or parent incarceration as an example of “unusual circumstances” that can be used for a dependency override. Although dependency overrides will still need to be conducted on a case-by-case basis, the inclusion of student or parent incarceration in the definition of “unusual circumstances” should streamline the process and ensure FAAs feel comfortable using professional judgment (PJ) for this purpose. ED should remind FAAs of this authority.

Recommendation 3B: Issue guidance outlining for FAAs how they might use their professional judgment authority to exclude a married independent student’s spouse’s income from the FAFSA. Congress could also consider making statutory changes that allow married incarcerated students to be considered single.

Rationale: Although some incarcerated students are married, these students are not directly benefiting from their spouse’s financial resources due to the nature of their incarceration, and in some cases are estranged from their spouses altogether. For these reasons, excluding spousal income from an incarcerated student’s FAFSA is appropriate in many cases, and ED should remind FAAs of their authority to use PJ in these cases.

Recommendation 3C: Remind institutions of their authority to update an independent student’s marital status due to a change in marital status after the FAFSA has been filed to address an inequity or to more accurately reflect the applicant’s ability to pay.

Rationale: Under 34 CFR § 668.55 (c), schools may change an independent student’s marital status if the student becomes separated or divorced after the FAFSA is filed, if the institution determines the update is necessary to address an inequity or to reflect more accurately the applicant’s ability to pay. ED should issue guidance reminding FAAs of this authority to change an independent student’s marital status to more accurately reflect their ability to pay. Guidance should explain the potential impacts on dependency status and advise FAAs to use this authority only when it is in the best interest of the student.

Recommendation 4: Provide flexibility to simplify the verification process and resolution of student eligibility issues for incarcerated students. While FAFSA completion and verification is a barrier for many students, it is particularly challenging for incarcerated students, who lack the internet and phone access that is usually needed to provide documentation required to complete verification.

Recommendation 4A: Provide alternate methods of verifying student identity.

Rationale: ED should examine options to simplify and streamline the process of verifying identity for incarcerated students. Obtaining a photo ID to verify identity has been challenging during SCP. Often, students are not permitted access to any of their external identification documents, and it may be impossible to make a copy of their Department of Corrections (DOC) identification card. As a result, during the SCP experiment, ED provided flexibility that allows FAAs to view the DOC identification card in person and include a note in the file that they have verified the student's identity (rather than annotating a copy of the ID as currently required for non-incarcerated students). If this verification is not done by a financial aid administrator, the statement must be notarized. At a minimum, ED should continue offering this alternate method of identity verification provided during SCP by which an FAA can meet with the student and sign off that their identity has been verified. ED should also consider additional alternate strategies of identity verification that are safe and secure, but minimize the burden on students and FAAs.

Recommendation 4B: Congress should eliminate the Statement of Educational Purpose as an eligibility requirement for incarcerated students. In the meantime, ED should eliminate the Statement of Educational Purpose as a verification item for incarcerated students selected under V4 and V5.

Rationale: Although some may argue that the Statement of Educational Purpose is a simple form that uses standard language, some incarcerated students have had issues signing the required statement during SCP. In general, students only have control over funds they receive as a Title IV credit balance. Because incarcerated students never receive Title IV credit balances, and thus do not have access to or control over any aid received on their behalf, they may object to certifying how the funds will be used. ED's current guidance is that the statement cannot be modified, and therefore may take more explanation for the student to be comfortable. The group recommends that Congress pass legislation exempting incarcerated students from signing the Statement of Educational Purpose in order to be eligible to receive a Pell Grant. In the meantime, ED should use its current authority to eliminate the Statement of Educational Purpose as a verification item for incarcerated students who are selected for verification under V4 and V5. While NASFAA's recommendation is to eliminate the Statement of Educational Purpose as an eligibility requirement for incarcerated students altogether, if the requirement is maintained, ED should at the very least allow for the use of modified language during V4 and V5 verification that is reflective of the fact that incarcerated students do not receive Title IV credit balances and thus do not have control over their aid, and that the institution is the party responsible for ensuring the proper use of the funds sent on behalf of the student.

Recommendation 4C: Work with federal and state partners to help students more easily access proof of citizenship/residency.

Rationale: Proof of citizenship or residency has been extremely difficult documentation for some SCP students to provide. If an incarcerated student does not have a family member or friend outside of the prison who can help them find the necessary paperwork, the FAA or program staff must assist the student in requesting a duplicate copy — something they often are unable to do because of privacy issues. Through working with federal and state partners and in collaboration with intake units/correctional departments, ED should provide as much assistance as possible to streamline the process of requesting duplicate copies of citizenship/residency paperwork and should ensure college and DOC staff are equipped with the best tools and guidance possible to assist students navigating this process. In some cases, a student's permanent resident card may have expired while they were incarcerated. Because permanent residency currently cannot be renewed while an individual is incarcerated, this created a major barrier for those who want to enroll in a PEP. ED should work to identify a solution for these students who would otherwise be Pell Grant-eligible if they were able to renew their residency status. One option is to work with its federal partners to allow for the renewal of permanent residency while still in prison, while another option is for ED to allow an expired residency card to serve as valid proof of residency.

Recommendation 5: Whether through issuing guidance, working with federal and state corrections partners, or assisting institutions in developing a memorandum of understanding (MOU), ED should work to ensure that incarcerated students' ability to enroll in and complete courses in PEPs is not substantially impacted by disruptions in enrollment caused by factors outside of their control, such as being moved to a new facility. Students who are incarcerated may have a variety of outside influences and situations that prevent them from completing courses within standard terms (e.g., semesters, quarters, nonterm payment periods) or at all. The combinations of facility maintenance and load-balancing issues, custody actions, and illness and quarantine can have an extreme impact on students who are incarcerated. When a student is moved to a different facility in the middle of a term, or even before they complete their program, their grades, progress toward completion, and future aid eligibility may be negatively affected. During SCP, there have been cases where students have been forced to withdraw from courses after being transferred out of their prison simply because a different facility had more available beds.

Recommendation 5A: ED should work with federal and state partners to provide PEPs with the authority to request to state DOCs that students be "held in place," ideally remaining at the same facility until they complete their program, but at a minimum for the duration of the courses they are currently enrolled in.

Rationale: ED should work with federal and state education/corrections partners to ensure that, whenever possible, students are allowed to remain in the prison facility for the duration of the program. If that is not possible, students should at least be able to remain in the facility until they have completed the classes they are currently enrolled in. Although there will be cases in which moving a student between facilities is inevitable, this should only happen when absolutely necessary, and if there is no practical way for the student to remain in the facility until the end of the program or course. Putting mechanisms in place to prevent withdrawals caused by facility transfer will be in the best interest of students, institutions, and taxpayers by allowing students to complete their courses and progress toward graduation as quickly as possible.

Recommendation 5B: ED should work with federal and state partners to ensure that, for cases in which an enrolled student must be moved to a different facility during a course or program, the student's ability to continue enrollment should be a consideration in determining the facility they are moved to, with a goal of transferring the student to a facility with a complementary program.

Rationale: Providing students with the ability to sustain their enrollment in cases of facility transfer is good for students, institutions, and correctional systems. Working with correctional partners to ensure to the extent possible that students who must be transferred are able to complete their courses and continue progressing through their programs will in turn promote student success, increase degree completion, and improve recidivism.

Recommendation 5C: Congress and ED should ensure that both students and institutions are held harmless when a student is unable to complete a course due to a facility transfer, at no fault of the student or institution. More specifically, Congress should ensure that in cases where incarcerated students are unable to complete a course they are enrolled in because of correctional facility transfers, students do not see a negative impact on their Pell Lifetime Eligibility Usage (LEU). Additionally, ED should not require institutions to do return of Title IV funds (R2T4) calculations for these withdrawals, and institutions must also ensure they do not maintain an institutional refund policy that results in a credit balance for these students.

Rationale: Ensuring incarcerated students who are unable to complete a course in which they are enrolled because of correctional facility transfers do not see a negative impact on their Pell Lifetime Eligibility Usage (LEU) aligns with previous congressional action to restore Pell LEU for students who lost eligibility in circumstances beyond their control. For example, Congress has previously expanded the instances in which LEU could be reset to include cases of school closures and when a borrower receives a borrower defense to repayment discharge. Just as students in these cases have regained Pell LEU that was previously lost due to circumstances beyond their control, incarcerated students who are unable to complete a course solely because they were transferred to a different correctional facility should not be left with a lasting negative impact on their aid eligibility. Congress should pass legislation allowing a student's LEU to be adjusted if they are unable to complete a course due to a correctional facility transfer outside of their control.

Requiring R2T4 when a withdrawal is caused solely by DOC/prison action harms both students and institutions. Incarcerated students never receive their Pell funds directly, and cannot get a job to pay off their balances like other students who withdraw, leaving colleges on the hook for returning Title IV funds, often after investing significant resources in the PEP, even if the withdrawal was caused solely by DOC/prison action. To ensure the elimination of the R2T4 requirement in these cases achieves its intended effect, institutions must also ensure that they structure their institutional refund policy in a way that does not result in a Title IV or other credit balance to students in these cases. Absence of such a policy would result in a Title IV credit balance on the student's account, which schools would, under existing Title IV regulations, be required to deliver to the student within 14 days, undermining the above recommendation that incarcerated students not be able to receive Title IV credit balances.

Recommendation 6: ED should develop a standard communication (e.g. fact sheet, guide, etc.) that institutions can distribute to prospective students to provide consistent, general information about college in prison programs and the availability of financial aid.

Rationale: Unlike most traditional students, incarcerated students typically do not have the internet and phone access needed to get general information on available college programs, costs, and financial aid eligibility. Providing institutions with a standard communication that can be distributed to prospective students will ensure that all students receive a baseline level of information prior to enrollment, which institutions can then supplement. Given that many students never meet face-to-face with an FAA, and instead receive support from program or prison staff who may not be experts in financial aid, this unified communication will also ensure that students don't miss out on important information. This communication should include basic information and expectations that all students should be aware of prior to enrollment. The goal of recommending that ED create this resource, with input from stakeholders, is to safeguard the rights of students without being burdensome on schools. Such a communication would both provide valuable information to students and hold schools accountable for providing students with a complete understanding of the implications their enrollment may have. For example, students should be aware that any overages (aid that exceeds the student's COA) will be returned to ED and not given directly to the student, and that receiving a Pell Grant while enrolled in a PEP will have an impact on their LEU and potentially their future aid eligibility and enrollment.

Recommendation 7: ED should collect data and evaluate the process by which state DOCs are selecting students to enroll in PEPs, with a goal of ensuring the selection process is equitable.

Rationale: To promote equitable access to postsecondary education in prisons, it is important that state DOCs have clearly documented policies about the criteria used to evaluate which students will be allowed to apply or participate in a PEP. Requiring DOCs to document their process for approving students will ensure that policies are minimizing subjectivity and being carried out consistently. ED might also consider whether parameters dictating the screening that DOCs can or cannot do when it comes to recruiting/approving students for PEPs is something that should be included in MOUs between state DOCs and colleges.

Recommendation 8: ED should ensure that incarcerated students with loans in default are able to benefit from the Fresh Start initiative.

Rationale: Resolving defaulted loans has been one of the most significant challenges experienced by students during SCP. Given the enormous barrier that default has presented during the experimental site, Fresh Start has the potential to be transformational for many students who would otherwise be unable to access Pell Grants due to having federal loans in default. ED should work in partnership with servicers to make this process as streamlined and automatic as possible for incarcerated students with loans in default, minimizing the steps that students must take to have their loans removed from default status. ED should also ensure that incarcerated individuals with defaulted loans, including those who are not currently enrolled but may wish to enroll in the future, are aware of Fresh Start and the steps they must take in order to benefit from the initiative. Ensuring that both PEP program staff and DOC education staff working inside prisons know about Fresh Start and are able to help students receive the benefits is also important.

Recommendations for NASFAA

As Pell Grant eligibility, and consequently access to postsecondary education, is restored to incarcerated students across the country, the financial aid community will play a critical role in counseling and assisting students through the aid application process. While a small subset of financial aid administrators has been involved with Second Chance Pell, most financial aid administrators have not worked with incarcerated students, nor in a prison setting since the ban was put into effect in 1994. FAAs should be equipped with the knowledge and skills needed to support and empower all students they serve, and incarcerated students are no exception. To ensure all eligible students are able to access Pell Grants, it is critical that FAAs be equipped with an understanding of the unique circumstances and challenges experienced by incarcerated students, as well as tools to support this population through the FAFSA completion process. NASFAA is well positioned to provide the professional development, training, and technical assistance that is crucial to ensuring FAAs are prepared to assist incarcerated students in navigating the financial aid process.

The exact nature of NASFAA's work aimed at supporting a successful implementation should be determined based on the evolving needs of the aid community as implementation draws closer. The following are examples of steps NASFAA could take to support FAAs working with incarcerated students.

Recommendation 1: Provide technical assistance, training, and professional development for financial aid and college staff who may be involved in prison education programs, with a particular focus on those who are helping incarcerated students access financial aid. For example:

- Examine NASFAA's existing training products and services — including credential and certification programs, online courses, and webinars — and determine areas where existing products and services could be expanded or enhanced to include training and professional development for FAAs working with incarcerated students following Pell Grant restoration.
- In addition to enhancing existing products, NASFAA could develop new FAQs and other resources that will provide members and others in the prison education community with need-to-know information about supporting incarcerated students through the financial aid process, including lessons learned and best practices from the Second Chance Pell experimental initiative. These new resources could be developed with input from NASFAA staff, FAAs who have been involved in SCP, and other stakeholders, and should be housed on a web center on the NASFAA website. Some specific FAQs that may be helpful include:
 - o Information and resources to assist institutions with COA development for programs serving incarcerated individuals. For example, it may be helpful to share sample COAs from SCP programs to provide assistance as institutions are developing program budgets and COA.
 - o FAQ with considerations for students who withdraw, drop, or reenter programs while incarcerated. Such a resource would include information on the implications that withdrawing or re-enrolling in a program might have on their current and future aid eligibility.
 - o FAQ on how to avoid pitfalls in collecting documentation that is required for FAFSA completion or verification. For example, an FAQ or "cheat sheet" for FAAs (which could also be shared with program staff or others supporting students inside the prison) that outlines steps that must be taken for a student to get their loans out of default through Fresh Start would also be helpful. Many SCP sites have also struggled with assisting students in collecting proof of citizenship/residency. Providing a resource that helps institutions guide students through the process of requesting duplicate copies of citizenship/residency paperwork would be very helpful.
 - o Given the constraints that incarcerated individuals often experience with accessing information in the prison system, NASFAA could create an FAQ on best practices to ensure prospective students have access to general information on postsecondary programs they might be able to enroll in and financial aid options that might be available to them.
 - o FAQs on reporting requirements and how FAAs and program staff can ensure their programs and various systems (Financial Aid Management Systems, Enterprise Resource Planning systems, Learning Management Systems) are set up to make reporting as seamless as possible.

Recommendation 2: Facilitate collaboration and community building among NASFAA members and institutions offering PEPs, with a goal of building a community of FAAs who work with incarcerated students and providing a forum for sharing challenges and best practices.

This may include hosting periodic roundtable sessions, facilitating other methods of collaboration (online forum, email listserv, Slack channel), etc.

Recommendation 3: Examine teams across NASFAA, outside of the Policy and Training and Regulatory Assistance (TRA) teams, to determine other areas of the organization that could support NASFAA's work around Pell restoration. For example, NASFAA could:

- Consider whether Blue Icon, NASFAA's consulting service, could host "Let's Talk" sessions for financial aid administrators whose institutions currently have — or are considering starting — a PEP. Such a session could include both FAAs as well as non-financial aid colleagues, given that Pell restoration implementation will require collaboration across many campus offices.

- Consider collecting, as part of NASFAA’s membership application, information on whether the institution has any programs operating in prisons where students are receiving Pell Grants. NASFAA currently collects basic demographic information from member schools. It will be helpful to expand this information collection to include a simple yes/no question on whether the institution administers Pell Grants to incarcerated students. NASFAA could then use this data to target training resources and build community among FAAs working with this population.

Recommendation 4: Help establish the financial aid community as a knowledgeable, engaged part of the prison education community that is regarded as the premier source of expertise for those with questions on financial aid for incarcerated students. Beyond providing technical assistance, training, and regulatory support related to FAFSA completion and actually administering financial aid to incarcerated students, NASFAA should consider ways to ensure the financial aid community working with prison education programs is well positioned to be at the table for strategic conversations around serving incarcerated students. In order to do this, FAAs will need to be knowledgeable about a range of topics related to PEPs and Pell Grants for incarcerated students that are related to, but not directly within, the financial aid wheelhouse. NASFAA should leverage partnerships with external organizations that may be able to assist in building the financial aid community’s general understanding of PEPs. Examples of topics that FAAs would benefit from a strong understanding are:

- The application/program approval process, including requirements from ED, accreditors, and states/state agencies.
- Best practices on developing MOUs between institutions and state agencies. Many campus stakeholders will be impacted by these MOUs, and it is critical that financial aid be consulted as these documents are being developed to ensure the financial aid office will have the access and resources necessary to process Pell Grants for eligible students. Developing a list of things to look for in an MOU (from a financial aid perspective) or sample MOUs could be one possibility.

Recommendation 5: Develop strategic partnerships with other associations, organizations, and stakeholders working to support a successful implementation of Pell Grant restoration. While NASFAA brings strong financial aid expertise, partnering with organizations with an expertise and focus on other aspects of Pell Grant restoration will help ensure the financial aid community is contributing to the larger ecosystem of groups working to ensure a smooth implementation that prioritizes student success. Examples of groups with expertise in other areas related to PEPs are: the Council for Higher Education Accreditation (CHEA), the Corrections Education Association, the Vera Institute of Justice, NASPA, NACUBO, and others.

Recommendation 6: Consider how NASFAA can support the efforts of state associations that are advocating to include incarcerated students in eligibility for state financial aid programs. Possible efforts could include:

- Monitor and track state financial aid policies to determine in which states incarcerated students are currently eligible for state financial aid programs.
- With guidance from the State Advocacy Network, consider how NASFAA might be a resource to associations whose states currently exclude incarcerated students from eligibility for state aid, but would like to engage in advocacy within their states to include justice-impacted students in eligibility for these programs.
- Expand the State Advocacy Toolkit to include resources related to expanding state aid eligibility to incarcerated students. This might include talking points and data on the benefits of providing postsecondary education opportunity to students in prison, including recidivism rates, post-release outcomes, etc.

Recommendation 7: Identify areas where future research and analysis is needed. Examine areas related to implementing Pell Grant eligibility for incarcerated students where additional research would be helpful in addressing the challenges experienced by both students and the financial aid community. This may include a deeper exploration of the challenges experienced by incarcerated students completing the financial aid application process, as well as the challenges the financial aid community experiences during and after the implementation of Pell Grant restoration.

Considerations for Institutions

This section outlines considerations for institutions that are currently or may in the future administer Pell Grants to incarcerated students enrolled in Prison Education Programs. While many of these considerations were drawn from the experiences of students and institutions involved in Second Chance Pell, additional research, data, and analysis is needed to fully understand best practices in administering financial aid for incarcerated students. The ideas outlined in this section are meant to provide institutions with things they should be thinking about if they plan to continue with existing PEPs or develop new PEPs in the era of Pell Grant restoration.

Institutional Consideration 1: Develop early and strong communication channels across institutional stakeholders.

Prison education programs provide opportunities for both students and institutions. These programs are most successful when there is clarity among institutional stakeholders on the goals, objectives, and regulatory requirements of the program, as well as how the institution will partner with other agencies to best serve this student population. Federal financial aid regulatory and procedural considerations, as well as initial program approval by accreditors and state agencies, should be included as part of the institutional strategy and program development.

In order for a program to be successful in serving students, it takes involvement from all institutional stakeholders. Financial aid offices should have a seat at the institutional table early on. Financial aid considerations should be part of the initial program definition, and the financial aid office should be in early communication with those responsible for coordinating the academic elements of a prison education program, such as the provost. By including the institution's financial aid experts in the process, implementation problems can be avoided. This will also ensure that Title IV compliance requirements are clear to all institutional stakeholders. Developing lines of communication among all stakeholders within the institution, prior to bringing in third parties such as prisons or state agencies, is critical.

Institutional Consideration 2: Consider the most appropriate internal division of specific responsibilities among various campus departments.

In order for students to move successfully through a prison education program, from inquiry to graduation, it is important that the institution be prepared to serve the unique needs of this population. Woven throughout each phase of running a successful PEP is the need for the institution to determine who (person/office) is equipped and trained to support the students enrolled in the program with their unique needs and challenges, and how those individuals/offices will communicate and work together.

Programs may be structured in different ways; however, the need to define the required work and responsible offices/organizations is present for all programs. One of the first steps in establishing a program is developing lines of communication with all stakeholders at the institution and determining the institutional structure of the program. This work prepares the institution to begin conversations with third parties (prisons, state agencies, accreditors). Institutions are encouraged to consider mapping the student journey/experience in order to both identify the responsible office or party for each step in the process and to identify policies and procedures that may require changes to adequately serve students in this program.

Specific responsibilities should be delineated and assigned early in program consideration. This is important to avoid either gaps or overlaps in essential tasks and oversight. Which responsibilities will fall to the aid office, which will fall to program staff, and which will fall to prison/corrections staff? Related specifically to financial aid, an important variable to discuss and determine early is whether the college personnel working with students to complete FAFSAs and navigate the financial aid process is a financial aid administrator housed within the financial aid office, or is program staff working specifically with the prison education program who coordinates with liaisons from the financial aid office.

Any institution contemplating the introduction of financial aid opportunities for students who are incarcerated should make clear determinations about which office and which personnel are appropriate to implement, manage, and communicate about all of the areas for consideration that are in this document. We recognize that supporting students in the program, with their unique needs and challenges, will require training and preparation for the institution.

Institutional Consideration 3: Determine institutional policies for incarcerated students who are not Pell Grant-eligible.

While many incarcerated students will be able to receive Pell Grants following the restoration of eligibility in July 2023, some students will remain ineligible for other reasons. The institution needs to determine, prior to students inquiring and applying to the program, whether students who are not eligible to receive Pell Grants are able to participate in the program via an alternative

funding source. During Second Chance Pell, some institutions maintained a policy that any admitted students would be able to enroll in their prison education program, even if the student was ultimately not found to be Pell-eligible. In these cases, schools covered students' costs through either waiving fees, providing institutional grants, or finding funding from other sources to enable non-Pell-eligible students to enroll.

While this practice certainly advances postsecondary access, it can be extremely expensive and may not be sustainable for many institutions with limited resources. Without institutional support or funding from other sources, most of these students are unable to enroll because they don't have the resources to pay out of pocket. It is important to consider the impact on prospective students who are not Pell-eligible and are thus unable to enroll while their Pell-eligible peers are. Institutions that are not able to provide alternate funding sources for students who are not Pell-eligible should consider how the determination of financial aid eligibility fits into their program intake process. These considerations should include whether students will be admitted to a program and/or allowed to register prior to the determination of Title IV eligibility, and how/when to disclose to students if acceptance into the program and/or registration for classes is contingent on Pell Grant eligibility.

Institutional Consideration 4: Develop cost of attendance (COA) for PEPs in a manner that appropriately accounts for the constraints and challenges of postsecondary enrollment within a prison setting.

The cost of attendance is the cornerstone to student persistence for educational programming for incarcerated students. As students consider enrolling in a PEP, it is essential to understand in detail what program costs are from start to finish based on tuition and fees, books, course materials, supplies, and equipment, and the cost of obtaining a license, certification, or a first professional credential. All students should review costs periodically to ensure funding aligns with costs to prevent negative financial concerns due to inadequate resources.

- a. Eliminate fees that are not applicable or accessible to the incarcerated student.** Each institution should strategically create COA figures understanding that incarcerated students pursuing educational programming do not benefit from traditional fees charged to students (i.e. housing, student health insurance, student government fees, student activity fees). Schools should focus on fees that are connected to a service provided to the student. Costs such as transportation, facility access, supplemental fees, or commuter fees should be omitted to support the direct costs of the student.
- b. Develop a simple, standardized charge to cover the costs of necessary course materials.** Because incarcerated students are not able to purchase textbooks and other course materials in the same way that students on a main campus would, institutions will need to consider how to appropriately account for course materials in the cost of attendance. To clarify and minimize charges and simplify the process of accessing materials needed for educational programming, institutions should consider building into the COA for a prison education program a single charge that accounts for any materials and textbooks that are required for their courses. This charge should be an institutional charge and must be the same for all students enrolled in the same program. Including a standardized course material charge for prison education programs is especially important given that incarcerated students are not able to receive Title IV credit balances. Without such a charge included in the COA, students could both lose out on Pell Grant dollars and be left with no way to pay for required materials that would otherwise be covered by Pell Grants. To meet the intent of this consideration, the institution could also consider including the costs for required books, course materials, supplies, and equipment into institutional charges for tuition and fees, as allowed under 34 CFR 668.164(c)(2).
- c. Consider building into the COA an institutional charge to cover the cost of obtaining a license, certification, or a first professional credential.** The law requires that the cost of obtaining a license, certification, or a first professional credential be included in the COA for PEPs. However, schools should ensure that this cost is in the COA without resulting in a situation where a student sees their Pell Grant amount reduced because the cost of obtaining a license, certification, or a first professional credential is included as an indirect expense that could only be received through a Title IV credit balance. One option institutions might consider is building into the COA a standard licensure/certification charge, which schools would collect and then use to cover the costs of licensure/certification for their students when the time comes. Including this as a direct institutional charge would allow students to use their Pell Grant to cover this COA component, while also avoiding the Title IV credit balance issue discussed in Recommendation 1A under "Recommendations for Congress & ED" since the funds would pass through the student's account.

Institutional Consideration 5: Ensure student access to information on program/course offerings and availability of financial aid.

Institutions should develop proper protocols for communicating with prospective students, giving special consideration to the best format for providing students with information (workshops, physical paper, etc.) and which campus stakeholders will be responsible for leading these efforts. Students should also have an opportunity to engage with staff to learn more and ask questions related to the program, costs, and eligibility for Pell Grants and other forms of financial aid.

- a. **Schools should develop strategies to provide incarcerated students with access to information and materials on the programs and courses that might be available to them.** This should include access to the institutional course catalog information for available PEPs. Students should also be made aware that they will need to receive approval from the state DOC to enroll in the program, and to the extent possible should be provided with information on the criteria used by DOC to determine student eligibility for the program.
- b. **Institutions should proactively provide students with information on their eligibility for financial aid.** Because most incarcerated students complete paper FAFSAs that are submitted through CPS, most do not receive a Student Aid Report (SAR), without which students have no way of knowing the result of their FAFSA (see Recommendation 2 in “Recommendations for Congress & ED”). To comply with existing consumer information requirements and ensure students are knowledgeable about their own aid eligibility and feel empowered to make informed enrollment decisions, institutions must consider the best way to provide students with the most important information on costs and aid eligibility. While traditional students may be referred to a campus website or student portal to receive information on costs and aid eligibility, incarcerated students do not have access to the technology usually needed to receive information through these channels. Without access through these typical channels, PEPs will need to proactively consider the best way to provide incarcerated students with this information, and in many cases will likely need to deliver this information to students in person. One way schools might go about doing so is by providing students with a printed document each year that outlines important information (in addition to the consumer information requirements specified in 668.41-.43 and 668.165(a)), similar to the financial aid offers sent to other students, which could include:
 - i. The total cost of the student’s program/courses
 - ii. The Pell Grant amount for which they are eligible
 - iii. Any other financial aid for which they are eligible (from institutional, state, or other sources)
 - iv. The amount of excess Pell that was returned to ED, along with a reminder of ED’s policy that any overages must be returned to the department and not received by the student
 - v. Additional information from the SAR that the student should be aware of

Institutional Consideration 6: Support students navigating course withdrawals.

Students may have to withdraw from a course for a variety of reasons, some of which are out of their control (such as being released or transferred to another prison).

- a. **Educate students on the impacts of withdrawals.** Like other students, incarcerated students may also decide of their own volition to withdraw from a course for another reason. Also like other students, incarcerated students do not always understand the underpinnings of financial aid eligibility. Institutions should take steps to educate students on the impacts that withdrawing can have on their current and future aid eligibility, to ensure students are able to make well-informed enrollment decisions. Providing students with a resource, similar to the student communication/fact sheet mentioned in the recommendations for ED, or including this information in an introductory “orientation” session required for all students would help to ensure that, prior to enrollment, students understand the impacts that withdrawing mid-term can have on their Satisfactory Academic Progress (SAP), Pell LEU, and potentially their future aid eligibility and enrollment. The ultimate goal should be to educate students and prevent situations where enrolling in a PEP does more harm than good by negatively impacting a student’s ability to receive financial aid and enroll in courses post-release.
- b. **Consider how to support students through the myriad circumstances outside of a student’s control that could lead to withdrawal in the middle of a course or program.** If a student is released from prison mid-term or mid-program and would like to complete the course/program, plans will need to be made to support the student in completing the remainder of the term or the nonterm payment period online or on campus. Institutions should consider how to support the student through transitioning into courses with other students post-release, such as a general orientation that acclimates the student to the broader institution and helps them navigate facets of enrollment that differ from their experience taking courses while in prison. If a student is switched to another facility, it is important to communicate with the transferring institution so that academic transcript is shared — along with providing an opportunity for a Leave of Absence (LOA) type of option for the student. Additionally, some students may fail to meet SAP requirements after having to withdraw from courses due to circumstances outside of their control. Institutions should make sure these students are aware that they may request a SAP appeal, being especially mindful of students who were forced to withdraw due to being transferred to another facility. Schools should also minimize barriers by making the appeal process as straightforward and simple as possible, and support students in submitting any required paperwork and necessary documentation.

Institutional Consideration 7: Protect student privacy and ensure institutional compliance with all Family Educational Rights and Privacy Act (FERPA) and other privacy-related requirements.

- a. **Consider building in a FERPA release form at the very beginning of the financial aid process, which would inform FAAs of any individuals that they may discuss a student's FAFSA and personal information with.** This form should be explained to students, who could then choose to give consent for FAAs to discuss their personal information with other individuals, such as PEP staff or corrections education staff that are providing FAFSA completion assistance within the prison. Once signed by students, this form should be kept on file so FAAs know with whom they are able to discuss the student's personal information.
- b. **Financial aid offices should also work in partnership with PEP staff and prison/DOC staff to ensure that any paper forms with student data or personal information are protected.**
- c. **Institutions should also be aware of privacy concerns beyond FERPA and FERPA releases.** These considerations are outlined in NASFAA's [data-sharing decision tree](#).

Institutional Consideration 8: Integrate PEPs into existing campus IT systems.

Colleges and universities use Enterprise Resource Planning (ERP) systems in structured and effective ways in order to manage their data information. Colleges will need to determine how to identify students who are enrolled in approved PEPs. The systems play an integral role in assisting colleges identify the prison education population in order to satisfy reporting requirements to ED. Additionally, the systems help to ensure colleges and universities stay in compliance with criteria set by the state and/or accrediting body. Learning information systems help colleges and universities provide students with resources like course material in an online format. Colleges and universities should identify a secure Learning Management System (LMS) in order for individuals in PEPs to access material when in-person teaching is not available. It also ensures individuals are equipped to transition to an educational program once they are released. Among the questions that should be considered by institutions are:

- Does the college have an LMS that is supported by DOC to offer educational programming?
- With most institutions relying heavily, if not exclusively, on online portals and email communication, how can processes that are highly dependent on internet/web-based platforms be adapted to work for incarcerated students?
- When new PEPs are created, how can ERP/LMS systems be developed to include the data elements that will be needed to meet reporting requirements?
- How to develop a coding system to easily identify students in PEPs in internal systems, similar to the coding used to identify student veterans. Any code should not be part of the students' identification such that other students would be able to determine they were in the PEP.

Institutional Consideration 9: Bolster staff education, training, and professional development.

It is important for institutions with PEPs to ensure that staff members who are responsible for administering federal financial aid are provided with education and training to understand the unique needs and environment of this student population. When working with more traditional student populations, FAAs are often accustomed to students proactively coming to the financial aid office and taking responsibility to complete required tasks and provide necessary information in order to receive financial aid. The ownership of responsibility is often flipped when working in a prison environment with incarcerated students, where FAAs or other staff working to assist students have to do a lot of legwork on the student's behalf. During SCP, it can take an FAA multiple trips, sometimes as many as three to four visits, to a prison to meet with a student, have them obtain all necessary information and documentation, and successfully complete required forms. This is a very different dynamic that often requires a different staffing model than what many aid offices are used to, and it's important that college staff, including FAAs, understand the nuances of working with this student population. Training both assists the institution with remaining compliant and provides staff with information and resources to ensure students are being adequately supported. Institutions might consider providing training on topics including:

- Understanding the unique challenges incarcerated students face related to the prison environment, and how these challenges impact students' abilities to navigate both the financial aid process and course enrollment. This may include challenges related to access to technology, phone/mail communications, changing availability due to schedule changes or infractions, etc.
- Training for staff who will be entering the prison to work with students directly, including rules, protocols, expectations, necessary clearance/background checks, etc.

- Common issues incarcerated students experience when completing the FAFSA and best practices to address those barriers.
- How to adapt processes that are highly dependent on internet/web-based platforms, online portals, student accounts, and emails to work for incarcerated students.
- Using people-inclusive language to serve this student population just like any other.
- How to protect student privacy and maintain FERPA compliance.
- How the “behind the scenes” aspects of financial aid administration, such as inputting students’ FAFSA into CPS and processing R2T4s, looks different when working with students who are in prison.

Institutional Consideration 10: Collaborate with external agencies and stakeholders.

In addition to federal agencies such as the Departments of Education and Justice, schools with PEPs will be required to work closely with state departments of corrections and individual prison facilities within which they offer programs. College staff, including FAAs and PEP staff, should work to proactively foster relationships with stakeholders outside of the institution whose partnership will be essential in operating a PEP that promotes student success. Examples of how institutions might approach these external partnerships include:

- Work in tandem with state DOCs and prisons, both on day-to-day logistics of operating a PEP and when setting up new programs and approving students for enrollment.** Institutions should build strong relationships with their state DOC liaison, local prison leadership, and the educational coordinators at the facilities they are working with. A strong partnership from the outset will help streamline the process of getting college staff inside the prisons and approving course content and materials. It will also help schools understand each DOC’s process for approving individual students to enroll in a PEP. Because all students will need DOC approval in some fashion, institutions may consider withholding a final admission decision until they receive approval from DOC. Developing a strong relationship with the education coordinator from the DOC will help the institution understand eligibility requirements for approval.
- Collaborate with prisons to develop introductory training for staff that will provide all stakeholders with a shared understanding of etiquette and systems within both college and prison personnel.** Prisons can then rely on college staff to protect access to the data that might be helpful while assisting the student with various tasks relating to their educational experience as a student. Far too often, systems are locked down, providing no digital access to needed materials for process completion or document access. Collaboration in this area will also assist with meeting ED’s reporting requirements by helping to avoid duplicative reporting and, in turn, minimize reporting burden.

Institutional Consideration 11: Beyond financial aid: Broader considerations for institutions offering PEPs.

Although not as directly related to financial aid administration as the considerations discussed above, the topics discussed below are additional aspects of administering PEPs and, as such, should also be weighed by institutions:

- Admissions Process:** In addition to meeting Title IV eligibility criteria and being approved for enrollment by the prison/state DOC, students must also be admitted to the institution itself. Institutions maintain their own internal admissions policies, opening another instance where incarcerated students may be impacted by the inability to access information that is required to be admitted to a program. It is important for schools to evaluate those policies and identify potential barriers that could impact the enrollment of incarcerated students.
 - o For example, although ED has announced that high school completion status would not longer be included as a verification item under the V4 and V5 tracking groups beginning in 2022-23, some institutions may require proof of high school completion for admissions purposes, which can be challenging for students who lack access to the systems needed to obtain that documentation.
 - o Institutions should modify their admissions policies to minimize challenges for students when possible, and should train staff to support incarcerated students in navigating barriers that remain in meeting the requirements for admission to the institution. In the example of obtaining proof of high school completion, many state departments of education have tools that allow schools to look up whether a student has completed a GED or high school diploma equivalency, which can be used to verify high school completion status once a student applies to the school. In cases where a student completed high school or obtained a GED outside of the state, this tool will not provide proof of high school completion so institutions may need to collaborate with the prison education coordinator and take other steps to obtain necessary documentation.

- b. Placement Testing:** Institutions should determine whether placement testing is necessary and, if so, the most efficient way to administer required testing. During SCP, placement testing often required a full day in the prison because paper tests take longer to complete without the skip logic of online testing.
- c. Advising/Course Registration:** Prior to registering for courses, students should receive academic advising to determine required coursework, availability of course offerings during a given semester, and whether there are sufficient credit hours of required coursework available to maintain the student's aid eligibility. Colleges should also consider the following:
 - o Developing PEPs that offer courses in sequential order and providing a regimen schedule that encourages program matriculation.
 - o Developing a mechanism for the student to register for courses and make enrollment changes outside of typical practices that may require web access or to obtain signatures from instructors, college officials, etc.
 - o Whether it might be possible for the institution, with permission and collaboration with DOC, to register the student in courses each term that align with their academic/program plan, reducing the need for web access each term.
 - o How to ensure students are provided with up-to-date information on where they are in their course of study and their progression towards degree completion.
- d. Course Materials:** Institutions must consider the challenges with getting required approval to bring course materials and textbooks into prison facilities. Providing educational supplies can be challenging and requires adhering to each prison's security procedures.
 - o For example, some facilities may require a tracking system for the distribution of graphing calculators.
 - o Further, what may be allowed at one institution may not be allowed at another. Restrictions apply to both physical materials, such as those needed for a science lab, as well as textbooks, which are reviewed for certain content.
 - o As early as possible, institutions should submit a proposed material/textbook checklist for DOC approval that includes everything an instructor will be bringing into the facility, including what the instructor is using and what will be left with students. Schools must understand that there is a timeline for the approval process, and academic coordinators must adhere to a timeframe by which to propose materials.
- e. Student Support Services:** Like all students, incarcerated students should be provided with services that support their academic and personal needs. To the extent possible, institutions should work to ensure that the student support services provided to PEPs are equitable to the services provided to students enrolled on the traditional campus.
 - o During SCP, availability and access to tutors, advising, and career services has been challenging. It is essential for incarcerated students to clearly understand how they are progressing toward program completion. The absence of this information can have an especially negative impact on students who are approaching reentry and may want to finish their degree once they are released.
 - o Career advising for individuals with criminal records must be developed to support the unique needs of this population. Academic and career advising must be inclusive of the unique circumstances experienced by individuals with criminal backgrounds and felonies since not all career options may be available given the specific circumstances. Sensitivity to the frustration and disappointment for this reality should be taken in working with the student. Schools must ensure that tutoring and potentially remedial education supports are established to support the students. Each institution should provide dedicated support for students on a semester basis to understand their progression and assist with reentry processes and information.
 - o To support the unique academic and personal needs of incarcerated students, institutions might consider providing a dedicated advisor(s) to provide academic and career planning support specifically for students enrolled in the PEP.
 - o Institutions might also consider how PEPs might be able to partner with existing offices on their campus, such as TRIO, to provide robust student support services.

f. Degree Completion/Graduation: While some students may complete their programs after being released, many students will finish their degrees while still in prison. There are a number of considerations for institutions related to students completing their program:

- o Institutions should consider how to recognize and celebrate the accomplishments of students who have completed their programs. While each facility varies in what it permits, celebrating the success of students who graduate and earn degrees will help promote a college-going culture within the prison and could encourage others to enroll in programs.
- o Once the student has completed their degree, institutions should also consider how to provide students with information on how to request official transcripts, which students may need for a variety of reasons. One common incentive related to students enrolling in a degree program is that they can apply for early release once they complete their degree and they will need to supply an official transcript as documentation. If the institution has a fully electronic transcript request process, it may be necessary to establish a paper request process for these students.

Conclusion

As the implementation of Pell Grant eligibility for incarcerated students approaches, financial aid administrators are eager to support incarcerated students enrolling in prison education programs. NASFAA looks forward to working with partners across the higher education landscape to meet the current and future needs of the financial aid community as it strives to support postsecondary access for incarcerated students.

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