Ready for Pell Evaluation

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Prepared by

Michelle Tolbert
Sandra Staklis
Mihaela Henderson
Nicole Reddig

RTI INTERNATIONAL

This report summarizes the findings from the evaluation of the Ready for Pell initiative. RTI International served as the independent evaluator. The initiative was funded by the Ascendium Education Group and led by Jobs for the Future.

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Executive Summary

For nearly 30 years, a college education was "practically unattainable" for incarcerated people.[1] The Violent Crime Control and Law Enforcement Act of 1994 removed Pell Grant eligibility for students in state and federal prisons and, as a result, the number of postsecondary education programs in prisons shrank from 772 programs in the early 1990s to eight programs in 1997. However, Congress reversed course in 2020 by passing the FAFSA [Free Application for Federal Student Aid] Simplification Act, which restored Pell Grant access to an estimated 463,000 incarcerated people who may be eligible for federal financial aid.[1]

In preparation for this change, the Ascendium Education Group, Inc. provided funding to Jobs for the Future (JFF) to lead the Ready for Pell initiative, which was designed to advance postsecondary education programs in state and federal prisons. Through a competitive proposal process, JFF selected 20 colleges, one state college system, and one state college organization to receive grants and technical assistance to support their work from January 2022–2024. JFF purposefully selected grantees that were at different stages of development: four of the colleges had established programs and 16 had newer or emerging programs; the state college system and state college organization supported a mix of emerging and more established programs. The grantees also comprised a mix of 2-year and 4-year colleges as well as both public and private institutions.[2]

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[1] J. Martinez-Hill,, & R. Delany. (2021). *Incarcerated students will have access to Pell Grants again. What happens now?* Vera Institute of Justice. https://www.vera.org/news/incarcerated-students-will-have-access-to-pell-grants-again-what-happens-now#:~:text=The%201994%20crime%20bill%20stripped,to%20only%20eight%20in%201997

[2] For the purposes of this report, the term "colleges" is used to describe 2-year community and technical colleges as well as 4-year universities.

As part of the initiative, the grantees agreed to participate in an evaluation to identify the policies and practices that supported effective and equitable implementation of quality programs and funding models. The evaluation included three components:

1. **An implementation study** to document the infrastructure, funding models, financial aid practices, and partnerships the grantees formed to support their programs.

2. **A student-centered analysis** to document student experiences with the programs and funding models as well as their motivations and goals for enrolling.

3. **A quantitative analysis** to assess the grantees' access to data on their students and programs and to document how their programs and funding models changed over time.

Information for the evaluation was collected through phone interviews with college staff and state departments of corrections' education administrators, in-person focus groups and interviews with students and prison staff, and two quantitative data collections. The following is a summary of the evaluation's key findings.

Program Offerings

- **Selection factors**: Colleges considered a variety of factors when selecting the programs to offer in prison, including student interest, space limitations, faculty availability, articulation agreements with other colleges, and support from the leadership of colleges, departments of corrections (DOCs), and facilities.

- **Program and course options**: Colleges were limited in the number of programs and courses they could offer in prison, and students wanted more options. The most common programs offered were in general studies, and the most common credential was an associate's degree.

- **Eligibility**: The DOCs and prisons determined who was eligible for enrolling in college programs based on multiple factors such as time to release, instances of misconduct, and custody levels. Most colleges used the same criteria for admitting students to their prison-based programs as for students coming to campus, and some had additional requirements such as completing an essay or interview.

- **Participation barriers**: Students reported that the most common barriers to enrollment were disciplinary infractions and not meeting the benchmark on academic skill assessments. Students also reported having to give up higher-paying prison jobs to enroll in their college programs and experiencing scheduling challenges between their prison jobs and classes.
- **Quality**: Most students were pleased with the quality of instructors provided by the colleges, but some had concerns about the academic rigor and quality of the online and hybrid programs.

Funding and Pell Grants

- **Funding models**: Most colleges were planning on Pell Grants being their primary source of funding, but were also identifying additional funding sources to cover non-Pell eligible students and develop the program infrastructure. Most colleges also were securing leadership support to lower tuition and reduce fees for their postsecondary education programs in prisons.
- **Financial aid**: Most students felt supported with the financial aid application process but had questions about how their Pell Grants were used by colleges, how course withdrawals would affect their funding, and how much funding would be available for them after release.

‘ Even though I have years to go inside, I need to leave with an education. I will be 56 when I leave and the best job for me will be an office job.

—Student

Student Supports

- **Access to student supports:** Students described having limited access to academic resources (e.g., technology and research materials) and support services (e.g., academic and career advising and tutors) that are commonly available to non-incarcerated college students.

- **Common support services**: The most common student services available, as reported by the colleges, were computer lab access, academic library access, academic tutoring, learning disability support or testing, and study hall. Students, however, described receiving a few, limited services.

- **Common reentry services**: The most common reentry services, as reported by the colleges, were admissions counseling or support, a pathway to attend a college or university campus, financial aid counseling, and referrals to community-based reentry services. Some DOCs and prisons provided services, such as legal support services and referrals to community-based reentry organizations. Few students described receiving any reentry support, but this may have been because most students who participated in the evaluation were several years from release.

Staff and Faculty Capacity and Training

- **Faculty recruitment and training**: Faculty were typically recruited through word of mouth and interviewed to assess their willingness and readiness to work in a prison setting. Once selected, they received program-specific training and supports in addition to the DOC-required security training.

- **College staff capacity**: Only about half of the colleges reported having a staff person dedicated to the program, and only four colleges' programs had a staff person who identified as impacted by the carceral system. Many of the staff with the administrative offices supporting the programs also shared that this work created capacity issues for them because many of them had to use manual processes for the prison program rather than their existing online systems.

- **Program coordination**: The level of program coordination provided by prison staff varied by state, but most staff indicated that the college programs exacerbated existing capacity issues at their prisons and therefore wanted additional support from college staff.

Data Collection and Sharing

- **Data capacity**: Most of the colleges worked with their institutional research offices to access data, but some smaller and relatively new programs were still building connections with these offices and collected data independently.

- **College data**: Colleges that had students enrolled in their postsecondary education programs in prison provided detailed data on their programs and students, including credits earned, course and program completion, and demographic data. Colleges collect little data, however, on students' education and career interests and overall experience with the program.

- **DOC data and data use agreements**: About half of the colleges could access corrections data on their students, such as sentence length, time to release, and facility transfers. Some colleges were also in the process of developing data use agreements with their DOCs.

The Ready for Pell initiative occurred as the landscape for postsecondary education in prisons was changing. Most of the participating colleges did not have access to Pell Grants prior to the end of the initiative. Even colleges with access to Pell Grants through the Second Chance Pell Experiment were still learning about the federal rules for Pell reinstatement and the process to become an approved prison education program (PEP).[3] Much work remains, therefore, for the Ready for Pell grantees and other colleges to implement quality postsecondary education programs effectively and equitably in prisons. Their work would benefit from more opportunities to learn from one another, particularly colleges that participated in the Second Chance Pell Experiment. Their work would also benefit from additional research that documents the experiences of colleges with the PEP approval and oversight assessment processes, including the colleges' ability to meet the "best interest" criteria.

This is a critical time for colleges, prisons, DOCs, and, most importantly, students who are incarcerated. The next few years will show the impact of Pell reinstatement on the education opportunities in prisons and how those opportunities affect students while they are incarcerated and, for many, after they are released.

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[3] The Second Chance Pell Experiment allowed a limited number of colleges to provide federal Pell Grant funding to eligible students incarcerated in federal and state prison beginning in 2015, prior to the restoration of Pell Grant eligibility. For more information on the experiment, see https://experimentalsites.ed.gov/exp/approved.html

Introduction

For nearly 30 years, a college education was "practically unattainable" for incarcerated people.[1] The Violent Crime Control and Law Enforcement Act of 1994 removed Pell Grant eligibility for students in state and federal prisons and, as a result, the number of postsecondary education programs in prisons shrank from 772 programs in the early 1990s to eight programs in 1997. Congress, however, reversed course in 2020 by passing the FAFSA [Free Application for Federal Student Aid] Simplification Act, which restored Pell Grant access to an estimated 463,000 incarcerated people who may be eligible for federal financial aid.[1]

In preparation for this change, the Ascendium Education Group, Inc. provided funding to Jobs for the Future (JFF) to lead the Ready for Pell initiative, which was designed to advance postsecondary education programs in state and federal prisons. Through a competitive proposal process, JFF selected 20 colleges, one state college system, and one state college organization across 15 states (Exhibit 1) to receive grants and technical assistance to support their work from January 2022–2024.

JFF purposefully selected the grantees at different stages of program development: four of the colleges had established programs and 16 had newer or emerging programs; the state college system and state college organization supported a mix of emerging and more established programs.

Exhibit 1. States with Ready for Pell Grantees
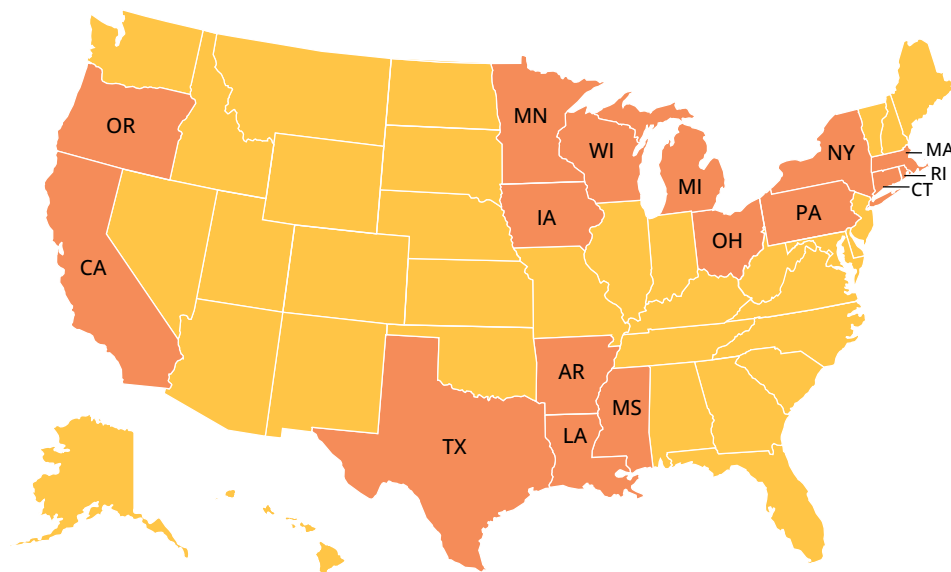
The grantees also comprised a mix of 2-year and 4-year colleges as well as both public and private institutions (Exhibit 2).[2]

Exhibit 2. Characteristics of Ready for Pell Grantees

Institution Type	No. of Grantees
Public 2-year	10
Private 2-year	1
Public 4-year	5
Private 4-year	4
Statewide System/Organization	2

Facility Type	No. of Grantees
Gender	
Men's Facility	16
Women's Facility	5
Security Level	
Minimum Security	8
Medium Security	12
Maximum Security	6

Note: Some of the grantees were serving multiple facilities; therefore, the totals per category do not equal the total number of grantees.

RTI International served as the independent evaluator of the initiative. The evaluation was designed to identify the policies and practices that supported effective and equitable implementation of quality programs and funding models. It included three components:

- **An implementation study** to document the infrastructure, funding models, financial aid practices, and partnerships the grantees formed to support programs.

- **A student-centered analysis** to document student experiences with the programs and funding models as well as their motivations and goals.

- **A quantitative analysis** to assess the grantees' access to data on their students and programs and to document how their programs and funding models changed over time.

Information for the evaluation was collected through phone interviews with college staff and state DOCs' education administrators, in-person focus groups and interviews with students and prison staff, and two quantitative data collections. See Appendix A for a more detailed description of the methodology and a list of the grantees.

[2] For the purposes of this report, the term colleges is used to describe 2-year community and technical colleges and 4-year universities.

Background

In 2020, the FAFSA Simplification Act restored Pell Grant eligibility for people who are incarcerated. Following passage of the law, the U.S. Department of Education developed the rules for colleges to become prison education programs (PEPs) and offer Pell Grants to incarcerated students. The final rules took effect on July 1, 2023.[3]

To apply for and receive approval from the U.S. Department of Education to become a PEP, colleges must be a public or private nonprofit institution and receive approval from their accrediting agency to operate in an additional location. They must also be approved by a correctional facility's oversight entity, which is typically a DOC, to provide services within the facility. After 2 years of initial approval as a PEP, the oversight entity must work with relevant stakeholders (e.g., representatives of incarcerated students, state education offices, and accrediting agencies) to determine whether the PEP is operating in the "best interest" of students (Exhibit 3). Oversight entities may also assess other factors as part of their "best interest" determination, including completion rates, rates of continuing education post-release, job placement rates, former students' earnings, recidivism rates, and other indicators of student success.

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[3] For a summary of the rules for PEPs, see both Federal Student Aid Knowledge Center, (2024), *Prison education programs*, Department of Education, https://fsapartners.ed.gov/knowledge-center/topics/prison-education-programs; and M. Hyder, (2023), Accessing Pell Grants for college programs in correctional settings: A summary of the regulations and requirements, Vera Institute of Justice, https://www.vera.org/downloads/publications/accessing-pell-grants-for-college-programs-in-correctional-settings.pdf.

In addition, the FAFSA Simplification Act requires that the U.S. Department of Education submit publicly available annual reports to Congress on the impact of PEPs on individuals who are incarcerated, using data provided by the oversight entities and participating colleges.

Exhibit 3. Criteria for Oversight Entity to Determine if PEP is in the "Best Interest" of Students

The **quality of instructors** offered in the PEP is substantially similar to those at other programs at the college.
The **quality of academic and career advising** services offered in the PEP are substantially similar to those at other programs at the college.
The **transferability of credits** and applicability of these credits toward related degrees and certificates are substantially similar to those at similar programs at the college.
The PEP must have transferability of credits and PEP students must have the **ability to continue** the program at any location of the college that offers a comparable program.

Evaluation Findings

The evaluation was designed to document how colleges work with their internal and external partners to develop, implement, fund, and support high-quality and equitable postsecondary education programs in prisons. Information was gathered from enrolled students and staff with the participating colleges, prisons, and state DOCs on the following research topics:

- **Student characteristics,** including their education background, motivations to enroll in postsecondary education programs, and their demographics.

- **Program characteristics**, including the types of programs offered, how they were selected, their accreditation status, how they were staffed and delivered, and the types of academic and other support services that were provided.

- **Program administration**, including eligibility criteria, the recruitment and enrollment process, and enrollment growth and credentials attained.

- **Funding**, including financial aid and funding models.

- **Data**, including student feedback and data capacity.

- **Partnerships, infrastructure, and policies** of the college, the statewide consortium for higher education in prison, the DOC, and partner prisons.

Student Characteristics

Student Educational Background and Motivations

A total of 68 students, representing a mix of demographics (e.g., gender, race, and age) and from facilities of varying security levels, participated in 12 student focus groups for the evaluation. Their education backgrounds varied. Some had experience with postsecondary education and financial aid prior to incarceration. Others had participated in self-paid, self-initiated correspondence postsecondary education programs in prison before enrolling in their current program. The remaining students indicated that their current enrollment was their first postsecondary education experience, not counting if they had participated in vocational programs while incarcerated.

> To have a degree when I get out is the absolute best use of prison time.
> —*Student*

The students cited a variety of reasons for enrolling in their current program, including preparing for employment after release, building their confidence, and being productive. Students shared their concerns about the impact of having a criminal record on their employment opportunities and believed having a postsecondary credential would help improve their prospects. They also viewed the program as a constructive way to fill the gap in their resumes and demonstrate their motivation and work ethic to employers. Other students expressed the need to focus on personal development by strengthening their knowledge, communication skills, and confidence and being exposed to more positive activities and people.

Student Demographics

At the time of the evaluation, 16 of the 20 colleges participating in the Ready for Pell initiative were offering postsecondary education programs in one or more prisons each. Twelve of the colleges could provide demographic data on their students in the 2022–2023 academic year. These data indicated that more than two-thirds of their students were aged 26 to 45, and nearly three-quarters of students were male (Exhibit 4).

Exhibit 4. Students' Age and Gender in 12 Ready for Pell Colleges' Postsecondary Education Programs in Prison, in 2022–2023

Age Group	Number of Students	Percentage of Students
<18	4	0.1%
18 to 25	374	10.9%
26 to 35	1,278	37.2%
36 to 45	1,110	32.3%
46 to 55	485	14.1%
>55	177	5.2%
Unknown	6	0.2%
Total	**3,434**	**100%**

Gender Group	Number of Students	Percentage of Students
Female	988	28.8%
Male	2,436	71.0%
Unknown	9	0.3%
Total	**3,433**	**100%**

Note: The totals differ because the number of students for whom data were submitted varied by data element.

White students made up about half of those enrolled (47 percent) and black students about a third (34 percent) (Exhibit 5). Nationally,[4] about 30 percent of the U.S. prison population is white, compared to 50 percent of students in postsecondary education programs in prisons; in contrast, individuals who are black make up 33 percent of the U.S. prison population overall and 33 percent of students in postsecondary education programs in prisons.[5] The demographic data from the Ready for Pell colleges are also consistent with research on the colleges that participated in the U.S. Department of Education's Second Chance Pell Experiment,[6] which found college students and Pell Grant recipients who are incarcerated to be predominantly white, male, and older than 24.[7]

Exhibit 5.   Race/Ethnicity of the Ready for Pell Colleges' Prison-Based Students in 2022–2023

Race/Ethnicity	Number of Students	Percentage of Students
American Indian or Alaska Native, not Hispanic or Latino	74	2.2%
Asian, not Hispanic or Latino	11	0.3%
Black or African American, not Hispanic or Latino	1,184	34.5%
Hispanic or Latino of any race	185	5.4%
Native Hawaiian or Other Pacific Islander, not Hispanic or Latino	4	0.1%
White, not Hispanic or Latino	1,613	47.0%
Two or more races, not Hispanic or Latino	155	4.5%
Race ethnicity unknown	207	6.0%
Total	**3,433**	**100%**

Note: The total in Exhibit 5 differs from students disaggregated by age group in Exhibit 4 because the number of students for whom data were submitted varied by data element.

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[4] For more information on national data sources on PEPs and students, see Appendix B.

[5] K. Chesnut, N. Taber, & J. Quintana. (2022). *Second Chance Pell: Five years of expanding higher education programs in prisons, 2016-2021*. Vera Institute of Justice. https://www.vera.org/downloads/publications/second-chance-pell-five-years-of-expanding-access-to-education-in-prison-2016-2021.pdf

[6] The Second Chance Pell Experiment allowed a limited number of colleges to provide federal Pell Grant funding to eligible students incarcerated in federal and state prison beginning in 2015, before the restoration of Pell Grant eligibility. For more information on the experiment, see https://experimentalsites.ed.gov/exp/approved.html

[7] E. Aguilar Padilla, E. L. Castro, & S. Gaskill. (2022). *Second Chance Pell recipients at four institutions: A brief descriptive analysis*. Research Collaborative on Higher Education in Prison; Chesnut et al. (2022).

Evaluation Findings

Program Characteristics

Program and Credential Types

As of fall 2023, 16 of the 20 colleges participating in the Ready for Pell initiative were each offering postsecondary education programs in one or more prisons. They were asked to provide the names, credentials, credit hours, and number of students enrolled for up to three of their largest Pell-eligible credential programs. Among the 26 credential programs reported, most were in general studies such as liberal arts or interdisciplinary studies. Other programs were in business and technical fields (Exhibit 6). The most common credential offered was an associate's degree, sometimes as a step toward a bachelor's degree program available in prison. Five colleges offered multiple credential programs, giving students the opportunity to continue in the same program and earn further credentials after attaining a certificate or associate's degree. Ten colleges reported offering programs that award one credential; four offered an associate's degree, four a bachelor's degree, and two a postsecondary certificate or diploma. Only one program reported offering students the opportunity to earn an industry-recognized certification.

Exhibit 6.   Largest Fall 2023 Ready for Pell Program Offerings by Field of Study

Field of Study	Examples	Number of Programs
General Studies	Liberal Arts and Sciences, Interdisciplinary Studies	10
Business	Business Management, Small Business Entrepreneurship	5
Technical	Intermediate Diesel, Construction Management	5
Other Fields of Study	Faith, Leadership, and Service; Opticianry; Psychology	6
Total number of program descriptions submitted		**26**

Program Selection

When selecting the programs to offer in prison, the college staff interviewed for the evaluation reported that they prioritized student interests, which were collected via surveys or one-on-one conversations with prospective, current, or former students. Selection was also influenced by other factors, such as

- space limitations,
- capacity of college staff to launch and coordinate the programs,
- faculty availability to teach the required classes for the programs,
- programs that could easily transfer to another college and lead to further education,
- college leadership support and funding,
- DOC and facility administration support, and
- capacity of facility staff to assist with coordinating the program.

> ❝ We want to create as many opportunities [as possible] for continuation … and to honor student choice. But we have to be strategic in the courses we offer and [with] the spaces we have for now.
>
> *— College Administrator*

Program and Course Availability

Most students who participated in the evaluation described having access to a limited number of postsecondary education programs compared to their counterparts in the community. They reported only having one to three programs to choose from and, therefore,

> ❝ I'm paying for it, I want more of a choice.
>
> *— Student*

enrolling in programs because of general interest or availability rather than alignment with their education and career goals. Some students had access to multiple colleges and a mix of delivery models, including in-person, online, hybrid, and inside-out programs.[8] Those who did not have a variety of colleges or delivery models to choose from indicated that they wanted more options.

Many students also reported that the courses they needed to complete their postsecondary education programs were not always available. One participant described her experience as follows: "It has taken me more than 3 years to get my associate's degree because I can't get into the classes I need and I have to take classes outside of my pathway." Some participants incarcerated in a women's prison said they wanted fewer humanities courses and more upper-level math, physics, finance, and business courses. They also wanted more building-trade programs (e.g., welding).

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[8] Online programs can include synchronous instruction through videos or asynchronous instruction. Hybrid instruction includes a mix of online programming and in-person instruction. Inside-out programs offer in-person courses at the facility that bring together students who are incarcerated and campus-based students.

Accreditation

More than half of the colleges' postsecondary education programs in prison were accredited or in the accreditation process at the time of the evaluation. With Pell reinstatement, accreditation from a postsecondary accrediting agency is required as part of the PEP approval process. The college must file a substantive change application with their accreditation agency to operate in an additional location, including a federal, state, or local penitentiary; prison; jail; or juvenile correctional facility. To assess whether the proposed program meets the same standards as substantially similar, non-PEP programs at the college, the accreditor is required to evaluate the PEP and, if applicable, two additional locations. They must also evaluate any PEPs with a new method of delivery. The accreditor is also required to conduct a site visit no later than one year after the start of the PEP.[9]

> " A lot of work went into it [the accreditation process], but it was well worth the work.
> – *College Administrator*

Faculty Recruitment and Training

To be an approved PEP, colleges must recruit PEP instructors who are substantially similar—in terms of experience and credentials—to those at other programs at the college; turnover rate should also remain substantially similar.[10] The colleges participating in the Ready for Pell initiative reported using a variety of recruitment methods, including word of mouth, an interest form or application, orientation sessions, and direct outreach. Most colleges also interviewed faculty to determine if they were the "right fit." As one college administrator noted, "It takes a certain type of faculty member to teach inside a prison." Although half of the colleges said that it was not difficult to recruit faculty and instructors, the other half reported experiencing challenges because of faculty's concerns with security, having to modify their syllabus and delivery approach because of limited or no technology in the prison, and/or lengthy commute times between the college and the prison.

Most of the colleges provided training to their faculty in addition to the DOC-required security training. Many of the colleges developed their own training or used a training from another state or organization. Some colleges also had a state higher education system that provided training, or they received support from their state consortium for higher education in prison. Regardless of the source, the trainings typically covered the history of the program

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[9] For more information on accreditation requirements, see the U.S. Department of Education's Prison Education Program Fact Sheet on Accreditation Requirements at https://fsapartners.ed.gov/sites/default/files/2023-05/PEPAccreditationFactSheet.pdf

[10] Pell Grants for Prison Education Programs, 87 F.R. § 65426 (2022). https://www.federalregister.gov/documents/2022/10/28/2022-23078/pell-grants-for-prison-education-programs-determining-the-amount-of-federal-education-assistance

and its core values, day-to-day logistics for teaching inside a prison, how teachers can adapt syllabi and delivery approaches, and how they can humanize the students without breaking the prison rules. Some trainings also focused on trauma-informed pedagogical practices.

To further support faculty, about half of the colleges developed in-person or virtual communities of practice for faculty to share lessons learned. A few colleges also reported pairing new faculty with a veteran faculty member for the first few weeks. Beyond these professional supports, some of the colleges mentioned providing faculty with travel reimbursements, a stipend for time spent adjusting a course, clear backpacks (to meet DOC requirements), and permitted classroom supplies. Other colleges developed handbooks, frequently-asked-questions documents, and online onboarding modules. Although the colleges recognized the need to provide their faculty with additional support, several shared that they did not want to overburden their faculty with trainings that—like other aspects of teaching in prisons—may not be covered by their salaries or stipends.

Delivery Approaches

The colleges participating in the Ready for Pell initiative reported using a mix of delivery approaches. According to their fall 2023 data, the colleges offered 15 in-person only programs, nine programs using hybrid instruction, and two virtual-only programs. Students who took hybrid or virtual-only courses reported having more exposure to technology, which they appreciated, but felt that the online delivery approach decreased the quality of instruction. Several said they wanted more interaction with their instructors and fellow students so that they could "hear what other students are asking and...listen to the material rather than just reading it." Other students, however, said they liked the flexibility of their online classes, the ability to proceed at their own pace, and having limited distractions from other students. DOC education administrators said that online and hybrid instruction helped to provide access to programming for students who are incarcerated in remote or maximum-security facilities.

> Even if the DOC gave faculty members a one-week training on all of these things, it still wouldn't address all of these very granular topics that come up on a day-to-day basis that might just be better suited in the moment to discuss with your peers.
> — *College Administrator*

Support Services

To be eligible to offer Pell Grants to students, postsecondary education programs in prison must provide students with support services, such as academic and career advising services, that are comparable to those available on the college's campus.[11] To understand the resources available to students and help colleges identify areas for improvement, the evaluation collected information on the services provided by the participating colleges.[12] For each service, colleges indicated whether the student support and reentry services were offered by the postsecondary program, the DOC or prison, or both.
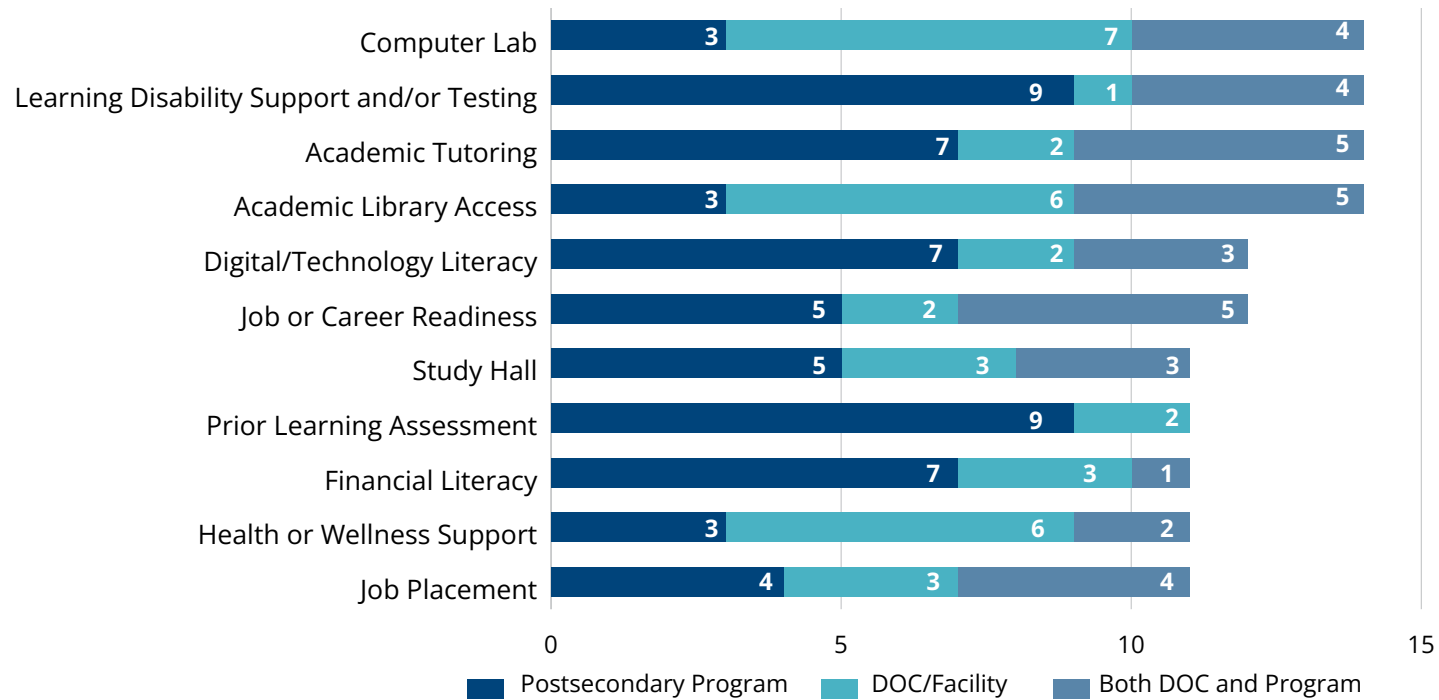
In fall 2023, all 16 colleges with operating programs reported offering an average of 15 student services. The most common support services were computer lab access (14 colleges), academic library access (14), academic tutoring (14), learning disability support and/or testing (14), digital or technology literacy assistance (12), and job or career readiness assistance (12). The number of services reported increased from 2022 to 2023 by an average of seven services per college; these added services included teaching assistants, job placement, and health and wellness coursework.

The data also show that colleges and their prison partners frequently collaborated on providing support services. Some 51 percent of the support services reported were provided by the college, 29 percent by the DOC or prisons, and 20 percent by both. However, some types of support services (e.g., prior learning assessments) were predominantly offered by the colleges, whereas other services (e.g., computer lab access, academic library access, and health and wellness support) were more often offered by the DOC or prisons (Exhibit 7).

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[11] Pell Grants for Prison Education Programs, 87 F.R. § 65426 (2022).

[12] For the quantitative data collection, colleges were asked to indicate available support services using a checklist of 30 student support and 19 reentry service types adapted from C. E. Royer, E. L. Castro, A. E. Lerman, & M. R. Gould. (2021). *COVID-19 and higher education in prison*. Alliance for Higher Education in Prison. https://www.higheredinprison.org/publications/covid-19

Exhibit 7. Most Common Support Services Available to Students in Fall 2023 by Service Provider

Service	Postsecondary Program	DOC/Facility	Both DOC and Program
Computer Lab	3	7	4
Learning Disability Support and/or Testing	9	1	4
Academic Tutoring	7	2	5
Academic Library Access	3	6	5
Digital/Technology Literacy	7	2	3
Job or Career Readiness	5	2	5
Study Hall	5	3	3
Prior Learning Assessment	9	2	
Financial Literacy	7	3	1
Health or Wellness Support	3	6	2
Job Placement	4	3	4

When asked about support services, students said they only received a few, limited services. Many students, for example, said they did not receive adequate academic and career advising. Those who did indicated that these services were offered by the college program lead, instructors, or a college navigator. The students recommended that the colleges strengthen their academic and career advising, including initial advising about the length of the programs, the number of credits they can earn each semester, and whether their class transfer ability to another facility or college after release.

Other support services mentioned by students were academic tutors, study halls, and library resources. Most students said they had limited access to academic tutors; those with access noted that

they received support from peer tutors or college-provided tutors who were helpful but not always familiar with the course content. Although many students said they had access to college- or prison-staffed study halls, few made use of these services (unless required) because of scheduling conflicts, disruptions from other students, or the assigned staff not being able to help with the coursework. Also, all students reported limited access to college-level library resources and, as a result, relied on materials provided by faculty.

In addition to the support services, the evaluation also collected information about the reentry services provided by the colleges. Few students described receiving any support, but this may have been because most students who participated in the evaluation were several years from release. According to 15 of the 16 colleges that provided data on reentry services, the most common reentry services available were admissions counseling or support, support services for the transition to college after incarceration, financial aid counseling, and referrals to community-based reentry services (Exhibit 8). Several of the colleges also indicated that they were partnering with a reentry program or beginning to offer transition services and supports, including a transition manual and resource center specifically for students who were formerly incarcerated. The reentry services offered by DOCs and prisons included legal support services and referrals to community-based reentry organizations.

Exhibit 8.   Most Common Reentry Services Available to Students in Fall 2023 by Service Provider

Service	Postsecondary Program	DOC/Facility	Both DOC and Program
Financial Aid Counseling	15		
Support Services for the Transition to a College/University After Incarceration	14		1
Admissions Counseling/Support	13	1	1
Referrals to Community-Based Reentry Organizations	7	3	5
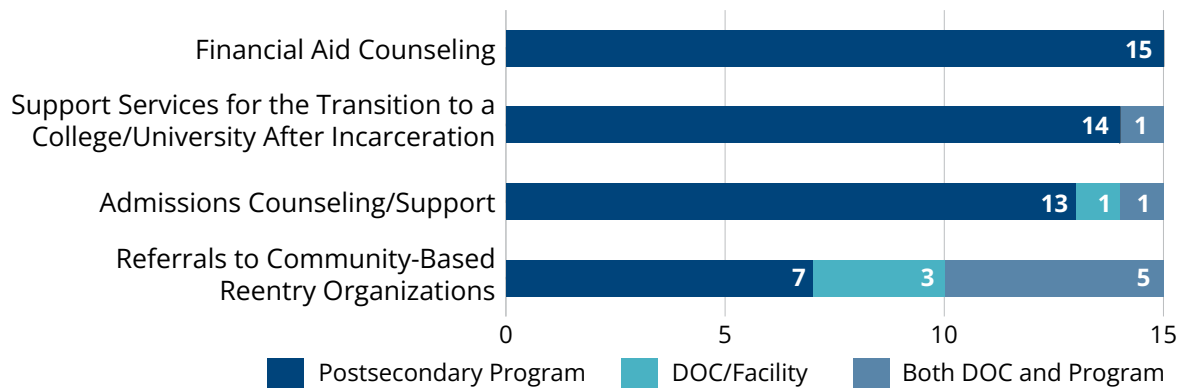
Program Administration

Eligibility Criteria

All colleges that participated in the Ready for Pell initiative said that their DOCs determined initial student eligibility, with the most common criteria being having no disciplinary infractions within a specific timeframe, having a certain number of years to release (typically 5 years), and being held under a certain custody level. One grantee also stated that the facility warden had ultimate veto power.

Most colleges reported using the same criteria for admitting students to their prison-based programs as for students coming to campus, including applicants submitting an interest form or application, taking an academic skills assessment or college placement test, and providing documentation of their high school credential. Some colleges also tried to determine whether students could complete the program—or, at minimum, the semester—before being transferred or released so that the students would not lose the opportunity to earn college credits or their Pell funding for a reason outside of their control. Several of the 4-year colleges required applicants to complete one or more essays to assess

their writing ability, motivation, and commitment to the program. Other criteria mentioned by colleges included prospective students having to obtain a recommendation from someone in authority at the prison (e.g., a warden, a chaplain, a counselor, or an education supervisor).

Although the colleges reported that they could not enroll everyone who was interested or eligible because of space limitations, most of the students said that they did not have to wait long before being enrolled and were not aware of others who were unable to enroll because of long wait lists. Rather, the students indicated that the biggest barriers to enrollment were disciplinary infractions and not meeting the benchmark on academic skill assessments, both of which could delay enrollment from 6 months to 2 years depending on the prison's policies. Students also reported having to give up higher-paying prison jobs to enroll in their college programs as well as experiencing scheduling challenges between their prison jobs and classes.

Recruitment, Enrollment, and the Financial Aid Application Process

Although the colleges reported using a variety of recruitment strategies (e.g., flyers, advertisements on prison TVs, orientations, and support from prison staff), most students described hearing about the program through word of mouth or at intake at the prison. Most students also reported attending an information session led by college staff that, according to the students, focused more on process, rules, and expectations of students than on program offerings and academic guidance. Some students also indicated that they sought guidance from prison education and case management staff, who were more accessible and familiar to students, rather than from the college staff.

Most colleges used a manual process to enroll students: the program leads or coordinators collected information by paper at the prison and then entered the information online once on campus. According to some colleges, the enrollment process was further complicated by misalignment between the prisons' and colleges' schedules, which reduced the amount of time the colleges typically had to enroll students.

With Pell reinstatement, colleges were beginning to integrate the FAFSA application into their enrollment process. To ease this process for students, colleges offered workshops and one-on-one support and created application tools for the students. However, the process remained cumbersome for at least half of the colleges that planned to do the FAFSA applications by paper; for these institutions, students signed a Family Educational Rights and Privacy Act (FERPA) statement so that staff could access the data to input online once on campus.[13] The other half of the colleges had or were applying for approval from their prisons to allow students to complete the FAFSA application online.

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[13] For more information on FERPA, see Appendix C.

Enrollment Growth and Credentials Attained

As might be expected for programs that are new or preparing for Pell reinstatement, nine of the 12 colleges with 2 years of enrollment data increased their enrollments from 2021–2022 to 2022–2023 (from 2,162 to 3,433 total, a 59 percent increase), particularly in associate's degree programs (Exhibit 9). The four largest programs among the Ready for Pell colleges began offering Pell Grants to incarcerated students through the Second Chance Pell Experiment in 2022–2023 and accounted for most (88 percent) of the enrollment growth.

Exhibit 9.   Enrollments by Credential Type Among Ready for Pell Colleges with 2021–2022 and 2022–2023 Enrollment Data

Credential Type	Program Enrollments by Credential Type		
	Number of Students Enrolled		
	2021–2022	2022–2023	% Change
Undergraduate certificate/diploma	1,669	1,764	6%
Associate's degree	319	1,334	318%
Bachelor's degree	72	86	19%
Other*	102	219	115%
Credential type missing	0	30	N/A
Total	**2,162**	**3,433**	**59%**

* "Other" refers to students who were taking courses towards a degree program but were still in process of getting fully admitted to the program.

Of the 16 colleges with operating programs, eight reported awarding postsecondary credentials in 2021–2022 and 2022–2023 (Exhibit 10). The other programs began enrolling students too recently for students to have graduated by fall 2023 (when data were collected). Undergraduate certificates and diplomas accounted for most of the credentials conferred in 2021–2022 and 2022–2023. Associate's degrees accounted for the remainder.

Exhibit 10. Number of Credentials Earned by Students with Attainment Data for 2021–2022 and 2022–2023

| Credential Type | Credentials Earned through Postsecondary Education Programs in Prison | | | |
| | 2021–2022 | | 2022–2023 | |
	%	Number	%	Number
Undergraduate certificate/diploma	91%	1,481	93%	1,653
Associate's degree	9%	153	7%	116
Total	**100%**	**1,634**	**100%**	**1,769**

Funding

Funding Models

Prior to Pell Grant restoration, most of the colleges that were already offering services in prisons relied at least partially on private funding to support their programs. Therefore, raising external funds was vital for these programs, particularly for private institutions that did not qualify for state appropriations. In addition to private funding, colleges' funding models included a mix of

- student self-pay (student or student sponsor funds);
- student benefits (e.g., veterans benefits, American Indian or tribal scholarship);
- state, county, and institution funding; and
- property taxes.

Several public colleges reported supporting their prison programs through a mix of state appropriations and grants, institutional funding, and external funding. The specific combination of sources and types of aid varied across colleges, highlighting the complexities of sustaining a postsecondary education program in prison without a dedicated funding source.

Colleges that were part of a multi-institution partnership appeared to have advantage in navigating funding challenges. For example, one college overcame a state requirement to gain legislative approval to lower tuition by partnering with a community college and a private 4-year institution to split costs. The community college provided the associate's degree tuition-free and covered instruction costs with state funds; the private 4-year institution had the flexibility to waive tuition and fees; and the college participating in Ready for Pell covered instructor salaries with state funds and additional costs with donor funding.

> As a private institution, we're not like the state institutions that receive state appropriation dollars. But in order to really have this be real for individuals and have it be a true second chance, they can't end up being straddled with a lot of student loan debt. So this is the nut that needs to be cracked. The starting point is getting Pell.
>
> *– College Administrator*

Several colleges participating in the Ready for Pell initiative gained access to Pell funding through the Second Chance Pell Experiment, which provided an opportunity to assess how these federal grants would affect their funding model. Most of their funding models shifted from private funding to Pell Grants. Colleges that did not have access to Pell funding during the evaluation expected most of their prospective students to be Pell-eligible, but also planned to use other funding sources to serve students not eligible for Pell. A small number of colleges, however, anticipated Pell Grants to play a secondary or no role in their funding model because of their high tuition costs and a desire to help their students reserve their Pell funding for college after release.

Cost of Attendance and Tuition

Many of the colleges reported using a different tuition and fees schedule for their postsecondary education programs in prison and planned to keep the cost of attendance under or close to the Pell maximum to cover all or most of the costs. Several colleges, however, indicated plans to waive student tuition. Other colleges said they could not change their fee structure because of state laws mandating tuition costs or preventing them from adopting tuition changes or waivers.

The colleges seemed to have more flexibility in addressing fees, and many planned to forgo all or some of the typical fees that campus-based students had to pay for services and activities not available in prison. Specifically, some colleges did not plan to charge incarcerated students fees for student and athletic activities, campus security, student government, or online courses, nor charge for indirect costs (e.g., for projector screens, lights, rooms, bathrooms).

Data

Student Feedback

According to the students who participated in the evaluation, course completion surveys were the most common method colleges used to collect student feedback.[14] Some students were unsure how the survey findings were used to improve the programs or courses. Many also said they wanted to provide feedback on components of the program aside from the faculty but did not have the option. A few students reported providing feedback on the program via a one-off focus group with a college administrator. In one prison, students were allowed to form a student advisory group that provided them with a structured mechanism to offer feedback to the college. Students did not describe any other systematic methods for collecting their feedback, despite at least one of the state DOCs indicating it administered an annual survey to its residents on their experiences with education and library services. Several of the colleges' institutional research offices also said they were exploring how to administer national surveys, such as the National Survey of Student Engagement and the Community College Survey of Student Engagement, to incarcerated students, but were struggling with transitioning the online survey to paper and excluding questions not relevant to students who are incarcerated.

Data Capacity and Data Use Agreements

In addition to using data for program improvement, programs applying to become a PEP must include a signed agreement with the oversight entity to provide data on the transfer and release dates of incarcerated individuals. To evaluate the colleges' ability to meet these and other data needs, the evaluation collected information about the colleges' data capacity and data use agreements with their DOCs.

All 16 colleges that had students enrolled in their programs in fall 2023 could provide detailed data on their programs and students, including credits earned and course and program completion. Most of the colleges worked with their institutional research offices to access these data, but some smaller and relatively new programs were still building connections with these offices and collected data independently.[15]

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[14] For more information on collecting student feedback, see Appendix D. For more information on ethical data collection, see Appendix E.

[15] For more information on data use agreements, see Appendix G.

Colleges with enrolled students also could provide student demographic data (gender, age, and race/ethnicity). In contrast, only seven of these colleges could provide student data from their DOC, such as infractions or transfers, which may affect student persistence, and time served and time to release, which may affect program access and completion (Exhibit 11).

Several colleges and DOCs also reported that they were in the process of developing data use agreements.[16] Even without data use agreements in place, all DOC education administrators interviewed for the evaluation said they shared some data with colleges and expected colleges to provide them with data. Most DOCs asked colleges to provide data on attendance, completion, and credentials earned.

One state DOC required its colleges to include these and other data in an annual report. Most of the DOCs gave college staff limited access to their corrections database to enter student data and access corrections data that would help with program planning (e.g., education history and expected release dates). One DOC was upgrading its data system to include a feature that would provide colleges with data reports on their students. Prison staff also expressed an interest in data on students' performance in class to identify students who need additional support from the facility.

Exhibit 11. Data Availability among Ready for Pell Colleges with Students Enrolled by Fall 2023

Data Element	Number of Colleges Reporting
Age and gender	16
Race/ethnicity	15
Amount of time served	7
Amount of time until expected release	7
Sentence length	7

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[16] For more information on data use agreements, see Appendix G.

Partnerships, Infrastructure, and Policies

Colleges and College Partners

Although all colleges that participated in the initiative had leadership backing, the level of support varied. Most of the program leads—who were typically faculty or college administrators with other responsibilities at the college—coordinated all aspects of the program, from faculty selection and training, to student recruitment and enrollment, to cultivating a partnership with the prison. A state-level staff person who supported multiple college programs stated that this approach was not scalable or sustainable, saying, "I make the case to college presidents that this is a full-time job. Passion is great, but it requires a lot of time." Only about half of the colleges, however, reported having a staff person dedicated to the program, and only four colleges' programs had a staff person who identified as impacted by the carceral system. Many colleges tried or wanted to hire someone with lived experience to work with the program but said that DOC policies prevented people with records from working inside facilities.

To help with program planning and implementation, several program leads formed cross-functional teams that included staff representing enrollment, financial aid, data collection, information technology, and other required administrative units at the college. These teams developed processes and policies to support the program and troubleshoot challenges. Other program leads were meeting with administrative units one-on-one as their support was needed. Many of the staff with these administrative units shared that this work was creating capacity issues for them and some also said they would have preferred to be engaged earlier in the process.

Some college program staff also received support from other colleges in their state, particularly their partner colleges and those that had participated in the Second Chance Pell Experiment. Staff in the different administrative units supporting the program said that they called their peers at the other colleges to learn about their processes and identify solutions to common challenges.

> "If you're going to build a program and do it, you need to do it well and have the infrastructure to manage it and sustain it.
> – *College Administrator*

> "I think we're all trying to figure out how to honor the work and make sure that we make this a priority, but juggling it against all of the other priorities.
> – *College Administrator*

State College System and Consortium

More than half of the colleges were in states with consortiums around higher education in prison programs. The perceived effectiveness of the consortiums varied, but they were typically reported to help with advocating for policy changes with the DOC (e.g., technology access) or higher education system (e.g., articulation agreements). Although most colleges reported having very little support from the state college system, several received extensive support, such as professional development, partnership development between colleges and prisons, coordination with the DOC, reentry pathways, research, and advocacy on behalf of the programs and students.

DOC and Prison Partners

Most colleges that participated in the Ready for Pell initiative received support from their DOCs, despite notable differences in how the DOCs and higher education systems operate. Some of the colleges reported meeting regularly with their state DOC education director, several said that their DOC hired a postsecondary education coordinator, and others had a college system that served as a point of contact with the DOC.

A few colleges also shared that Pell reinstatement strengthened their relationships with their DOC and helped gain support for program-friendly DOC and facility policies. For example,

one grantee leveraged Pell reinstatement to get approval for educational holds to prevent students from being transferred mid-semester.

Despite these accomplishments, the colleges shared that it can be difficult partnering with their DOCs because of their structures and priorities. One staff person said making change within the DOC is like "turning the Titanic; the environment in general is incredibly change-resistant. And so, I feel like our coordinators are hitting a brick wall with a toothbrush." Many colleges therefore stressed the importance of developing an interagency agreement to help address differences in culture, policy, and practice. Agreements may also help sustain the program through leadership changes at both DOCs and colleges.

Most colleges, however, shared that they developed good relationships with their partner prisons, although the support varied between prison staff. Many colleges had a point person at the prison who helped to coordinate the program, and most also recognized that the postsecondary education program added another layer of responsibility to those staff people.

> The DOC has a history of making decisions to address an issue that affects everyone rather than focusing on who created the problem. Having the [state] education director advocate on behalf of the program helps.
> – *College Administrator*

Conclusion and Recommendations

The evaluation was designed to identify the policies and practices that support effective and equitable implementation of quality postsecondary education programs in prisons.[17] Through information provided by students, college and prison staff, and state DOCs' education administrators, the evaluation gathered insights into the types of programs and support services available in prisons and the infrastructure, funding models, and partnerships used to support those programs.

The evaluation documented the tremendous amount of work that the participating colleges, college systems, and college organizations completed as they prepared for Pell reinstatement. They have developed

- policies and processes to support student recruitment and enrollment;

- tools to help students with the FAFSA application process and, in some prisons, permission to access technology so that students can apply online;

- funding models that include lower tuitions and fees and leverage external funds to cover costs of students who are Pell-ineligible;

- trainings and other supports to help faculty teaching in the prisons; and

- strong working relationships with their partner prisons and DOCs.

The evaluation also documented areas where more work is needed. These areas include

- offering students more programs, course options, support services, and opportunities to provide feedback;

- increasing financial aid transparency for students;

- making the case to college leadership to dedicate more staff to the postsecondary education programs in prisons, including bolstering the capacity of administrative offices to support the program;

- gaining greater access to technology to streamline enrollment, financial aid, academic and support services, and data collection processes;

- securing long-term funding to address costs not covered by Pell Grants;

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[17] For more on program evaluation, see Appendix H.

- strengthening their data capacity and establishing data use agreements with their DOCs;

- providing prison staff with additional support with program coordination; and

- forming and leveraging statewide higher education consortiums and/or receiving more support from state higher education agencies.

The Ready for Pell initiative occurred as the landscape for postsecondary education in prisons was changing. Most of the participating colleges did not have access to Pell Grants before the end of the initiative. Even those colleges with access to Pell Grants through the Second Chance Pell Experiment were still learning about the federal rules for Pell reinstatement and the process for a program to be approved as a PEP. Much work remains for the Ready for Pell grantees and the broader field to implement quality postsecondary education programs effectively and equitably in prisons. Their work would benefit from more opportunities to learn from one another, particularly colleges that have more established prison-based programs and partnerships with their DOCs and prisons. Their work would also benefit from additional research that documents (1) the experiences of colleges that gained PEP approval and underwent oversight assessment processes, including how colleges met the "best interest" criteria, and (2) the experiences of students enrolling in and completing postsecondary education programs in prisons, including their experiences with different program and course options, delivery approaches, student support and reentry services, and transitioning to postsecondary education programs at other facilities or in the community.

This is a critical time for colleges, prisons, DOCs, and, most importantly, students who are incarcerated. The next few years will show the impact of Pell reinstatement on the education opportunities in prisons and how those opportunities affect students both while they are incarcerated and, for many, after they are released.

> ‘ Feels like we need to slow down with Pell and focus on quality, not quantity. We need to build trust with students and be able to answer their questions.
> — *Prison Administrator*

Appendices

Appendix A: Methodology

Appendix B: National Data Sources on Prison Education Programs

Appendix C: Family Educational Rights and Privacy Act (FERPA)

Appendix D: Student Voice and Feedback

Appendix E: Ethical Data Collection

Appendix F: Working with Institutional Research

Appendix G: Data Use Agreements

Appendix H: Program Evaluation

Appendix A: Methodology

The Ready for Pell initiative was designed to strengthen postsecondary education programs in state and federal prisons in preparation for the restoration of Pell Grant eligibility in 2023. Twenty colleges, one state college system, and one state college organization were selected in January 2022 to participate in the 2-year initiative. They received grants and technical assistance to achieve the following intended outcomes: (1) develop high-quality, accessible, equitable postsecondary education programs in prisons that maximize opportunities for students while incarcerated and after release; (2) establish funding models, including financial aid practices, that promote student access and credential attainment and transparency; (3) ensure programming and funding models are shaped by the experiences and voices of students and provide choice; and (4) create a state infrastructure that supports and helps expand programs.

RTI International was the independent evaluator of the initiative. The purpose of the evaluation was to identify the practices and policies implemented by the Ready for Pell grantees that led to effective and equitable implementation of quality programs and funding models. The evaluation included three components:

1. **An implementation study** to document the infrastructure, funding models, financial aid practices, and partnerships the grantees formed to support their programs.

2. **A student-centered analysis** to document student experiences with the programs and funding models as well as their motivations and goals for enrolling.

3. **A quantitative analysis** to assess the grantees' access to data on their students and programs and to document how their programs and funding models changed over time.

The evaluation was guided by a set of research questions (Exhibit A-1) organized around the four intended outcomes.

Exhibit A-1.   Research Questions

Outcome 1: High-quality, accessible, equitable postsecondary education programs in prisons that maximize opportunities for students
1A. How are postsecondary education programs in prisons preparing to leverage Pell, in addition to other possible funding sources, to expand opportunities for learners who are incarcerated?
1B. How are colleges preparing to recruit students who are incarcerated to ensure equitable access and enrollment?
1C. How is program eligibility determined, what are the criteria, and how do the criteria affect accessibility and equity in practice?
1D. How do colleges select degrees/majors/courses to be offered to students who are incarcerated and are students provided with a choice?
1E. What types of academic advising and career counseling are available to support recruitment and enrollment in postsecondary education programs in prisons that align with student career interests and goals?
1F. What types of supports (e.g., peer mentoring, technology access, and study space) are colleges providing students who are incarcerated to ensure persistence and completion and how do these supports compare to the services available on campus?
Outcome 2: Funding models, including financial aid practices, that promote student access and credential attainment
2A. What funding and program models are used by the postsecondary education programs in prisons, and how do those models change over time to increase student access and completion?
2B. How are colleges adapting their financial aid practices to increase eligibility, provide ongoing, individual financial aid advising, increase program participation in prison and after release, and ensure equity in all practices?
2C. How do institutions and systems organize to maximize this new funding source toward the goal of increased student access and success through statewide coordination efforts to scale postsecondary education programs in prisons and integrate campus-based student success initiatives?
2D. How are colleges planning to use funds to provide in-prison and transition support services that promote student success and help them navigate postsecondary education programs and financial aid in prison and after release?
2E. How effective are colleges' financial aid processes for students who are incarcerated, and what additional supports are needed?
2F. Do colleges—and their partners (e.g., students, financial aid officers, prison officials)—understand the new Pell reporting requirements and the procedures required to operationalize FAFSA [Free Application for Federal Student Aid] and Pell?

Exhibit A-1.   Research Questions (continued)

Outcome 3: Postsecondary education programming and funding models that are shaped by the experiences and voices of students
3A.   What KPIs [key performance indicators] have colleges identified to track success over time for students enrolled in their postsecondary education programs in prisons? Are these KPIs grounded in the essential elements of student success (e.g., percentage of students receiving one-on-one advising, credit/course completion rates by person and by program, enrollment in community-based education and workforce programs after release) and inclusive of critical and qualitative elements informed by students' experiences?
3B.   How are colleges incorporating the voices of students with the design and development of the postsecondary education programs in prisons and funding models?
3C.   How do program participants and nonparticipants perceive the accessibility and equity of postsecondary education programs in prison?

Outcome 4: Outcome 4: State and facility infrastructure that supports and helps expand PEP programs
4A.   What support and infrastructure are needed at the state level to support and expand postsecondary education programs in prisons?
4B.   What support and infrastructure are needed at the college and facility levels to support and expand postsecondary education programs in prisons?
4C.   What partnerships have been established across agencies and institutions to support postsecondary education programs in prisons, data collection and sharing, and policy change to increase programs access and choice?

Implementation Study

A key component of the evaluation, the implementation study documented the grantees' experiences preparing for Pell reinstatement. Between February and June 2023, the evaluators conducted 44 in-depth interviews with at least one of the grantees' staff members. A total of 90 staff, including program leads and co-leads, administrators of departments sponsoring the program, directors of relevant administrative offices (e.g., financial aid, admissions, institutional research, and student success), faculty, advisors, and state college system staff (Exhibit A-2) participated in the interviews. Interviewing staff in various roles ensured a broad and detailed understanding of the programs, their infrastructure, and their staff experiences preparing for Pell reinstatement. These discussions gathered insights into the infrastructure, funding models (including financial aid strategies), and partnerships established by the grantees to support their programs and students, as well as how they measured student success and incorporated student feedback into their programs. The interviews also investigated challenges faced by staff as they prepared for the reinstatement of Pell, and the ways in which they used the initiative's technical assistance and other resources to navigate these challenges and refine their procedures.

Exhibit A-2.   Summary of the Ready for Pell Grantee Interviews

State	Grantee	Experience	College Type	No. of Staff Interviewed	Staff Type
AR	Arkansas Northeastern College	Emerging	Public 2-year	5	Lead, department administration, financial aid, student advisor
CA	California State University – San Bernardino	Emerging	Public 4-year	5	Lead, coordinators, reentry program director, admissions
CT	University of New Haven	Long-standing	Public 2-year/ private 4-year	4	Lead, assistant lead, department administration, coordinator
IA	Des Moines Area Community College	Emerging	Public 2-year	3	Co-leads and department administration

Exhibit A-2.   Summary of the Ready for Pell Grantee Interviews (continued)

State	Grantee	Experience	College Type	No. of Staff Interviewed	Staff Type
LA	Tulane University	Emerging	Private 4-year	4	Lead, department administration, admissions, coordinator
MA	Benjamin Franklin Cummings Institute of Technology	Emerging	Private 2-year	3	Department administration, financial aid, and facility education administration
MA	Tufts University	Emerging	Private 4-year	3	Lead, coordinator, student success
MI	Grand Valley State University	Emerging	Public 4-year	1	Lead
MI	Hope Western Prison Education Program	Emerging	Private 4-year	6	Co-leads, financial aid, faculty coordinator, department administration
MN	Minneapolis Community and Technical College	Emerging	Public 2-year	7	Co-leads, financial aid, admissions, department administration, institutional research (IR)
MS	Northeast Mississippi Community College	Emerging	Public 2-year	3	Lead, admissions, IR
NY	Herkimer County Community College	Long-standing	Public 2-year	3	Lead, financial aid, coordinator
NY	Research Foundation for SUNY [State University of New York]	N/A – State System	Supports 4-year/ 2-year public colleges	2	Lead, research/policy
NY	University of Buffalo	Emerging	Public 4-year	1	Lead
OH	Sinclair Community College	Long-standing	Public 2-year	7	Lead, financial aid, admissions, coordinators, IR

Exhibit A-2.   Summary of the Ready for Pell Grantee Interviews (continued)

State	Grantee	Experience	College Type	No. of Staff Interviewed	Staff Type
OR	Portland State University	Emerging	Public 4-year	7	Lead, advisors, admissions, financial aid, registrar
PA	Pennsylvania State University	Emerging	Public 4-year/ 2-year	1	Lead
RI	College Unbound	Long-standing	Private 4-year	4	Lead, department administration, faculty, financial aid
TX	Amarillo College	Emerging	Public 2-year	6	Co-leads, department administration, IR, financial aid
TX	San Antonio College	Emerging	2-year	6	Co-leads, financial aid, admissions, IR
WI	Moraine Park Technical College	Long-standing	2-year	8	Co-leads, department administration, coordinator, advisor, financial aid, admissions, faculty
			TOTAL	**90**	

Student-Centered Analysis

To document the experiences of students and facility staff, the evaluation team conducted site visits between July and November 2023 to seven facilities in four states served by the Ready for Pell college grantees. A total of 68 students, of varied demographics (i.e., gender, race, and age) and from facilities with different security levels, participated in the 12 student focus groups. Most of the students were enrolled in 2-year degree programs, although a small number (15) were enrolled in programs that provided 2-year and 4-year options. The focus group participants addressed questions on the following topics: the recruitment and enrollment process, course and degree selection, their understanding of how the programs were funded, the federal student aid application process (if applicable), the support services available, and their ability to provide feedback on the program.

A total of 23 facility staff also participated in individual or group interviews. Facility staff included regional education directors, facility education supervisors, facility instructors, college coordinators, lab facilitators, case managers, warden assistants, and correctional officers. In two states, college staff assigned to the facility to administer and coordinate the program were also interviewed. They addressed questions on the following topics: their role with supporting the program, the history of the program at the facility, facility policies and procedures that may have affected student enrollment and completion, and the infrastructure and supports provided by the college and department of corrections (DOC) administration.

In December 2023, the evaluators interviewed five DOC education administrators in states where eight grantees (two of which were the focus of the site visits) were located to document their experiences with the postsecondary education programs in prison. The administrators addressed questions on the following topics: history of college programs in prisons in the state; the state's role with college and program selection; state policies affecting eligibility, recruitment, enrollment, and completion; state data on students and data sharing agreements with colleges; funding for college programs; and state higher education in prison consortiums.

Quantitative Analysis

The evaluation included the collection and analysis of quantitative data submitted by the grantees to understand (1) program and program enrollment changes occurring with Pell reinstatement and (2) programs' access to data and capacity to respond to federal reporting requirements. It included two rounds of data collection: baseline data covering the 2021–2022 academic year in fall 2022 and follow-up data for the 2022–2023 academic year in fall 2023. The 2 years of data allowed the evaluation team to assess how the colleges' planning for the reintroduction of Pell changed the grantees' academic offerings, enrollment, and student services. Using a template and instructions provided by the evaluation team,

16 of the grantees provided data on their programs and student services in 2022 and 2023. The also provided data on student enrollments, demographic characteristics, and credit and credential attainment. Data collection excluded the New York state college system and the Arkansas state college organization, which provide support for and coordination among postsecondary institutions offering programs rather than operating programs themselves. It also excluded four institutional grantees (University at Buffalo, Pennsylvania State University, San Antonio College, and Grand Valley State University) with for-credit postsecondary programs in development that had not yet enrolled students.

Appendix B: National Data Sources on Prison Education Programs

Postsecondary institutions can capitalize on existing national data sources to obtain information on prison education programs (PEPs) and students. This resource provides a brief overview of the following data sources:

- Integrated Postsecondary Education Data System (IPEDS)
- Federal Student Aid (FSA) Data
- Program for the International Assessment of Adult Competencies (PIAAC) Survey of Incarcerated Adults
- Education Justice Tracker (EJT)
- National Student Clearinghouse (NSC)
- National Directory of Higher Education in Prison Programs

Integrated Postsecondary Education Data System (IPEDS)

IPEDS is a system of interrelated surveys conducted annually by the U.S. Department of Education's National Center for Education Statistics (NCES). IPEDS gathers postsecondary education information from every college, university, and technical and vocational institution that participates in federal student financial aid programs. All institutions that participate in, or have applied to participate in, any federal student financial aid program authorized by Title IV of the Higher Education Act of 1965 (such as Pell Grants and federal student loans) must complete the IPEDS surveys.

IPEDS collects data on U.S. postsecondary education in eight areas:

- Institutional characteristics
- Institutional prices
- Admissions
- Enrollment
- Student financial aid
- Degrees and certificates conferred
- Student persistence and success
- Institutional resources

These data are made available to students and parents through the College Navigator college search website and to researchers and others through the IPEDS Data Center.

With Pell Grant eligibility reinstatement set to take effect on July 1, 2023 (for the 2023–24 award year), challenges remain about how the new law impacts IPEDS data collection and reporting. These include the following:

- Precedents for collecting comprehensive national data on the enrollment, persistence, and completion of students who attend higher education while incarcerated are lacking. As a result, effective practices for ethically and responsibly collecting and reporting data on students who are incarcerated for IPEDS are still in development.

- Practices for reporting of institution-level data on prison education programs and students lack standardization across postsecondary institutions. Some institutions already include data on incarcerated students in their IPEDS reporting, potentially masking differences between the prison and main campuses across a variety of measures including demographic makeup, resources and student support services, and cost structures and charges.

According to a 2022 IPEDS Technical Review Panel (TRP)[1] report, potential upcoming changes to IPEDS data collection include the following:

- A Yes/No question may be added asking whether the institution enrolls incarcerated students for credit to identify which institutions serve these students (and provide context to their IPEDS data).

- Data may be collected on the turnover or departure rate of prison education program instructors. The definitional work will need to be completed and the feasibility of this should be further explored prior to any implementation.

Once the proposed changes described above are implemented, postsecondary institutions may use IPEDS data to answer questions such as:

- How prevalent is higher education in prison in the United States?

- What are the characteristics (e.g., level, control, sector, selectivity, urbanicity, enrollment size, etc.) of institutions providing higher education in prison?

- What is the turnover rate of PEP instructors?

- How does the turnover rate of PEP instructors differ from that of non-PEP instructors?

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[1] The TRP is a pool of impartial and independent experts from which members are drawn to serve on review panels as needed. TRP meetings are conducted to obtain peer review of IPEDS-related project plans and products and to foster communications with potential users of the data.

Federal Student Aid (FSA) Data

FSA is an office in the U.S. Department of Education and the largest provider of student financial aid in the nation. It is responsible for managing the student financial assistance programs authorized under Title IV of the Higher Education Act of 1965. These programs provide grant, work-study, and loan funds to students attending college or career school. FSA data include data collected from Award Eligibility Determination/Central Processing System, Common Origination and Disbursement system, and the National Student Loan Data System.

FSA plans to collect additional data for students in PEPs that will be published in an annual report evaluating prison education programs and their student outcomes. Whereas IPEDS data is at the institution level, FSA's data collection will provide data at the program and student levels. Although the full spectrum of administrative data obtained by FSA for annual reporting on incarcerated students and their programs (required by statute) is currently unknown, FSA data will likely include the number of confined or incarcerated individuals receiving Pell Grants, the amount of Pell Grant awards, and the demographics of confined or incarcerated individuals receiving Pell Grants.

The types of research questions FSA data will help answer may include the following:

- How many PEP students received Pell aid, and what are their demographic characteristics?
- For PEP students who received Pell aid, what was their cumulative or yearly Pell amount received?
- How many PEP students took out federal loans, and what are their demographic characteristics?
- For PEP federal borrowers, what was their overall amount borrowed/owed? How much did PEP students borrow/owe in subsidized and unsubsidized federal loans?
- How much did PEP students borrow in undergraduate/ graduate federal loans, and how much did they owe (i.e., principal and interest) as of certain year?

Program for the International Assessment of Adult Competencies (PIAAC) Survey of Incarcerated Adults

PIAAC is a recurring, large-scale study of adult skills and life experiences led by the Organization for Economic Cooperation and Development (OECD) and conducted in the United States by NCES. PIAAC measures relationships between individuals' educational background, workplace experiences and skills, use of information and communication technology, and cognitive skills. This international survey is administered every 10 years and has been conducted twice. PIAAC Cycle I took place between 2011 and 2018.

PIAAC Cycle II started in 2022, and its first round of data collection is scheduled to be completed in 2023. The first survey was conducted from February through June 2014 and targeted a nationally representative sample of incarcerated adults aged 16 to 74.

According to a 2016 report highlighting findings from the 2014 PIAAC survey, the survey seeks to assess incarcerated individuals across four domains:

- Literacy (defined as "understanding, evaluating, using and engaging with written text to participate in society, to achieve one's goals and to develop one's knowledge and potential")

- Reading components (i.e., reading vocabulary, sentence comprehension, and basic passage comprehension)

- Numeracy (defined as "the ability to access, use, interpret, and communicate mathematical information and ideas, to engage in and manage mathematical demands of a range of situations in adult life")

- Problem solving in technology-rich environments (defined as "using digital technology, communication tools, and networks to acquire and evaluate information, communicate with others, and perform practical tasks")

Additionally, the PIAAC survey collects data on skill use and background characteristics, including the following:

- Educational background

- Work history

- Intrapersonal, interpersonal, and professional skills

- Use of intrapersonal, interpersonal, and professional skills on the job and at home

- Examples of questions that the PIAAC survey data may answer include the following:

- How does the U.S. incarcerated population compare with the general or "household" population of U.S. adults on key demographic characteristics?

- How does the U.S. incarcerated population compare with the general or "household" population of U.S. adults on literacy and numeracy scores? How do literacy and numeracy scores vary by demographic characteristics?

- What was incarcerated individuals' employment status prior to their incarceration? How does employment status vary by demographic characteristics?

- How many incarcerated individuals had a prison job? How do literacy and numeracy scores vary by prison job status and demographic characteristics?

Education Justice Tracker (EJT)

EJT is a digital tool originally developed for the Cornell Prison Education Program (CPEP) with the goal of notifying CPEP staff of a PEP student's release from prison and facilitating access to postsecondary services for students and alumni after release. The tool combines publicly available criminal justice data from state corrections databases and data on student academic progress (e.g., grades, credits earned). Efforts are currently underway to further develop and expand the use of the EJT digital tool and models nationwide, with funding from Ascendium Education Group.

As the EJT tool becomes more widely accessible, postsecondary institutions may be able to use it to answer questions such as:

- How many PEP students have been released throughout the PEP, and what is their distribution by county?

- What is the education attainment (e.g., master's degree, bachelor's degree, associate degree, 30 college credits or more, etc.) or academic performance of PEP students who have been released? How do they vary by location?

National Student Clearinghouse (NSC)

NSC is a nonprofit and nongovernmental organization that serves as a source for postsecondary and secondary student degree, diploma, and enrollment verification. NSC also helps postsecondary institutions meet data reporting requirements set by state and federal agencies. Specifically, NSC facilitates the calculation of college-going rates that account for private and out-of-state enrollment and compliance activities related to the periodic certification of Title IV aid recipients' enrollment. In addition, postsecondary institutions use NSC data to track and assess the educational achievement of former students.

More than 3,300 colleges and universities, enrolling over 99 percent of all students in public and private U.S. institutions, report to NSC. These institutions allow NSC to make their information available, in full compliance with the Family Educational Rights and Privacy Act (FERPA),[2] to educational organizations, such as outreach programs, for the betterment of education.

NSC's StudentTracker tracks the postsecondary enrollment and degrees of former students nationwide. Additionally, NSC empowers institutions to better understand their students' educational progress and pathways though the Postsecondary Data Partnership (PDP). The PDP provides postsecondary institutions with student data via data files and interactive Tableau dashboards that allow extensive data analyses and visual explorations by a wide range of campus stakeholders. Using data provided via NSC, a postsecondary institution might answer key questions about their students after release, such as:

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[2] FERPA is a federal law that protects the privacy of student education records at institutions.

- Where did PEP students enroll in postsecondary education?

- How long were PEP students enrolled?

- Was PEP students' postsecondary attendance mostly full-time or less than full-time?

- Did PEP students transfer between colleges?

- Did PEP students receive a college degree? If yes, what type of degree?

- Where did PEP students graduate from college?

National Directory of Higher Education in Prison Programs

The National Directory of Higher Education in Prison Programs is an online repository of information about higher education in prison programs in the United States initiated in 2008 by the Prison Studies Project at Harvard University. The directory serves as a resource for people seeking information about postsecondary education programs in prisons in the United States, such as program descriptions, admission application, curriculum, student

handbook, etc. Currently, the Alliance for Higher Education in Prison in partnership with the Research Collaborative on Higher Education in Prison at the University of Utah and the Goldman School of Public Policy at the University of California, Berkeley, hosts the directory and also distributes the Annual Survey of Higher Education in Prison Programs, a survey collecting data about PEP institutions.

Using the National Directory of Higher Education in Prison Programs, postsecondary institutions may answer questions such as:

- How many known PEPs are there in the United States and/or in specific U.S. regions or states?

- How long have PEPs been operating?

- What types of postsecondary institutions are affiliated with PEPs?

- Where are the postsecondary institutions offering PEPs located?

- In what type of facilities and through what mode of engagement are PEPs offered?

- What credential pathways do PEPs provide?

Appendix C: Family Educational Rights and Privacy Act (FERPA)

FERPA is a federal law that protects the privacy of students' education records. The term "education records" means those records that are (1) directly related to a student and (2) maintained by an educational agency or institution or by a party acting for the agency or institution. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education.

At the postsecondary level, FERPA affords "eligible students"[1] the right to have access to their education records, the right to seek to have the records amended, and the right to have some control over the disclosure of information from the records.

Under FERPA, an educational institution is prohibited from disclosing personally identifiable information from students' education records without consent unless the disclosure meets an exception to FERPA's general consent requirement. Examples include school officials with legitimate educational interest, such as institutional research staff conducting analyses of prison education program effectiveness; other schools to which a student is transferring; staff conducting audit or evaluation activities; appropriate parties in connection with financial aid to a student; organizations conducting studies for or on behalf of the school; accrediting organizations; judicial or legal staff to comply with a judicial order or lawfully issued subpoena; appropriate officials in cases of health and safety emergencies; and state and local authorities, within a juvenile justice system, pursuant to specific state law.

Schools may disclose, without consent, "directory" information such as a student's name, address, telephone number, date and place of birth, honors and awards, and dates of attendance. However,

> **Eligible students have the right to**
> - Inspect and review their education records maintained by the school
> - Request that a school correct their education record if they believe it to be inaccurate or misleading

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[1] When a student reaches 18 years of age or attends an institution of postsecondary education at any age, the student becomes an "eligible student," and all rights under FERPA transfer from the parent to the student.

schools must tell eligible students about directory information and allow parents and eligible students a reasonable amount of time to opt out of disclosure. It is important to note that opting out of directory information disclosure does not preclude institutions from using student education records for audit, evaluation, and program improvement purposes.

FERPA and Prison Education Programs

Postsecondary institutions enrolling incarcerated students must navigate the challenges of providing higher education in prison while also complying with FERPA guidelines. For example, students in prison education programs face restrictions on the use of technology that make it difficult for them to access the information needed to complete their Free Application for Federal Student Aid (FAFSA). Prison education programs may need to develop a process for securing student consent so that school staff can access student education records and help facilitate FAFSA completion.

Institutions operating future Pell-eligible prison education programs may also be required to collect data on various student activities and outcomes, including access to academic and career services, corrections transfers, post-release enrollment, completion rates, and job placement rates. Given that some institutions may gain access to sensitive student information (e.g., transfer facility,

sentence length, time to release, etc.), Department of Education guidance suggests institutions that receive such information that is not used in the determination of federal financial aid eligibility should develop internal policies on redaction in close collaboration with their counsel. Any decision to redact information appearing in incarcerated students' records should follow applicable privacy laws, including FERPA.

To solve these challenges, some institutions are exploring the use of third-party technology to overcome facility restrictions and deliver distance education to incarcerated students or send FERPA-protected student data such as grades. As institutions consider implementing third-party technology and/or collect student information from incarcerated students and the department of corrections (DOC), they must carefully evaluate how student consent and privacy of education records impact such efforts. For example, it is common practice for DOC to require students with online accounts to provide their passwords so DOC can access their information. In this context, it is important that data sharing agreements between DOCs and postsecondary institutions explicitly address protections for FERPA-related data.

Recommendations

Department of Education recommendations[2] for implementing FERPA in the context of prison education programs include the following:

- New language should be adopted when discussing FERPA issues, moving away from using "FERPA release" to "consent to share information."

- Every request for students to provide consent for the college to share their information should be accompanied with a standard support letter from the education director of the state DOC.

- Conducting orientations/seminars on understanding FAFSA and the consent form should be mandatory. This step could be built into the current delivery of financial aid advisement.

- Sharing of the students' education record as governed by student consent should include relevant DOC representatives rather than staff names. For example, the consent request could specify job titles, such as education director, education coordinator, site-based education navigator, or unit team counselor. If a postsecondary institution needs to list actual staff names, the consent must be collected every time there is a change in staff.

Additional Resources

Department of Education runs the Privacy Technical Assistance Center (PTAC) as a one-stop resource for answering questions and addressing concerns related to privacy, confidentiality, and security practices. The center provides timely information and updated guidance on privacy, confidentiality, and security practices through a variety of resources, including training materials and opportunities to receive direct assistance with privacy, security, and confidentiality of student data systems. Institutions may also contact PTAC directly at https://studentprivacy.ed.gov/contact.

For additional resources and information related to federal student privacy laws, see https://studentprivacy.ed.gov/. Examples of resources offered by PTAC that contain extensive information on student privacy rights include the following:

- An Eligible Student Guide to the Family Educational Rights and Privacy Act (FERPA)

- FERPA 101: For Colleges & Universities

- FERPA 201: Data Sharing under FERPA

- Protecting Student Privacy While Using Online Educational Services: Requirements and Best Practices

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[2] These recommendations were obtained from shared communication between Kansas Department of Corrections and the U.S. Department of Education and were reviewed for accuracy by the Department's Privacy Technical Assistance Center.

Appendix D: Student Voice and Feedback

By empowering students to voice their opinions and concerns, student surveys can help colleges gain insights into curriculum effectiveness, instructional methods, and support services. The same applies to prison education programs, where student feedback can help programs tailor course offerings to student needs and interests, refine instructional methods and support services, as well as identify post-release support needs. By valuing students' perspectives, colleges foster personal growth, rehabilitation, and successful reentry into society.

Common College Student Feedback Surveys

Developing surveys to collect student feedback for prison education programs can require time and resources; however, prison education programs can leverage common preexisting surveys at their institutions. Examples include the National Survey of Student Engagement (NSSE) and the Community College Survey of Student Engagement (CCSSE). More than 2,200 colleges and universities use the NSSE and CCSSE to:

- Assess and enhance undergraduate education quality
- Direct resources toward effective teaching, curriculum, and support services
- Compare performance with peer institutions, such as engagement and learning across institutions
- Demonstrate accountability and commitment to ongoing improvement and data-driven decisions

These surveys focus on measuring student engagement, which research has shown to be a strong predictor of academic success and personal development. They measure engagement indicators such as:

- Active and collaborative learning
- Student-faculty interactions
- Academic challenges
- Supportive campus environment

Other Campus Surveys

Prison education programs can also benefit from building upon other existing surveys on campus, including:

- **Course evaluation surveys**, which assess the effectiveness of individual courses, instructional methods, and instructors during and at the end of a course
- **Academic advising surveys**, which assess the need for and effectiveness of guidance and support in course selection and academic planning at the college
- **Career advising surveys**, which evaluate the quality and impact of services related to job searching, resume development, and interview preparation for current students
- **Graduation surveys**, which gather feedback on overall satisfaction with academic programs and areas for improvement and collect information on student's post-graduation plans (e.g., employment, graduate school)
- **Alumni surveys**, which collect feedback on program effectiveness, employment outcomes, and suggestions for ongoing improvement

By adapting these preexisting surveys for the unique context of prison education programs, institutions can efficiently collect essential feedback, save time and resources in survey development, and identify the needs of incarcerated students. It is important to note that, while surveys can be used to collect student feedback, prison education programs likely face additional barriers with addressing feedback, particularly if changes to facility or department of corrections policies and practices are needed. These surveys can nonetheless generate findings that can be used to advocate for policy changes and shape practices and processes during the design and implementation phases of a program.

Prison Education Program Surveys

Many prison education programs prioritize incorporating student feedback at various stages and through different methods to ensure the student voice remains central to their programs. For instance, many Ready for Pell grantees reported using student interests and needs to inform their decisions regarding course offerings and programs of study during program establishment. While some grantees gathered this information through informal

conversations, others developed and employed surveys to learn about students' aspirations and career goals. A prevalent survey among Ready for Pell grantees is the course evaluation survey, which comes after the program is already being implemented and is typically administered at the end of each term.

Prison education programs can also develop their own surveys and procedures to collect data about student needs and planning for after release. For example, Lee College, a prison education program not affiliated with Ready for Pell, conducts a reentry needs assessment to collect data on students' housing, transportation, prior education, intentions to continue education, and job skills. This comprehensive approach enables the institution to identify the specific challenges that incarcerated students might encounter upon reentry, which can lead to the development of effective support services and educational programs.

Designing and Adapting Surveys for Prison Education Programs

Whether designing or adapting college surveys for prison education programs, the following factors can affect their relevance and effectiveness in capturing incarcerated students' unique experiences:

- **Technology considerations:** Surveys may need to remove or adjust questions related to technology access as needed, given the varying levels of technology available in prison settings.

- **Course-related questions:** Questions mentioning honors courses, internships, or field experiences may need to be revised or removed, as applicable.

- **Time management questions:** Questions measuring time spent on college-sponsored organizations, sports, family care, or commuting may need to be changed to reflect activities that are relevant to the prison environment.

- **Department of corrections support and interactions:** Although many college surveys evaluate interactions with college staff and instructors, it may be worth adding questions related to interactions with department of corrections staff and prison facility support, as these factors may significantly influence incarcerated students' educational experiences.

- **Survey administration:** The survey administration mode may need to be adapted to accommodate the prison setting, taking into account factors such as limited internet access; the need for paper-based surveys and appropriate space to complete the survey; and secure, confidential data collection methods.

- **Privacy Concerns:** Surveys should include language that clearly explains the purpose of the survey to students, addresses any concerns about privacy that students may have upfront, and specifies who will have access to survey results and how those results will be used.[1]

Not all colleges and universities employ the NSSE or CCSSE to collect data from students, and prison education programs will need to contact their institutional research (IR) office to determine whether their college or university uses this resource. Additionally, prison education programs will need to work with their IR office and department of corrections to develop survey administration strategies appropriate for students who are incarcerated.

Prison education programs should note that surveys such as the NSSE and CCSSE may not be able to adapt the content of the questions and should work with their IR office on these data collection efforts.

Prison education programs should contact their IR office to determine what surveys are being administered across their college or university.

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[1] Prison education programs should review and adhere to the Protection of Pupil Rights Amendment (PPRA) when collecting data through surveys or other means. Ensuring compliance with the PPRA is particularly important when these programs are funded, in part or in whole, by the U.S. Department of Education. Doing so protects students' rights and maintains the ethical integrity of the data collection process, regardless of the challenging context of the prison environment.

Appendix E: Ethical Data Collection

Data collection and analysis can be used to better understand the outcomes, successes, and challenges of education programs, including postsecondary education programs in prisons. Research has many potential benefits; however, marginalized populations, such as people who are incarcerated, have historically been vulnerable to exploitation in research. This brief highlights resources on best practices for researchers to protect the autonomy, privacy, and rights of individuals who are incarcerated, such as community-level ethics review boards and involving incarcerated individuals as co-researchers in the data collection process. The resources cover federal guidelines and protections, ethical data collection frameworks and methodologies, and reentry data collection.

Federal Guidelines and Resources

Guidelines for Conducting Meaningful Research in Jails

A brief article describing high-level guidelines for successfully proposing and conducting jail-based research. The author includes succinct suggestions for protecting the safety and security of people who are incarcerated, establishing relationships with relevant stakeholders, and designing methodologically sound studies. Some of the guidelines are also applicable to prison-based research.

Source: Reena Chakraborty, National Institute of Justice, November 2019

Prisoner Involvement in Research

Department of Health and Human Services (HHS) Office for Human Research Protections guidance on federal regulations describing the protections for people who are incarcerated and involved as subjects in prison-related research. This guidance was last revised in 2004 and applies to research conducted or supported by HHS.

Source: HHS Office of Human Research Protections, 2003

Prisoner Research FAQs

HHS Office for Human Research Protections webpage answering frequently asked questions about research involving people who are incarcerated. The webpage describes institutional review board (IRB) procedures for reviewing prison-based research proposals before data collection to protect the rights and welfare of research participants.

Source: HHS Office of Human Research Protections

Ethical Frameworks and Methodologies for Data Collection

The Ethical Framework for Research Involving Prisoners

An academic book chapter describing the research principles of justice and respect for persons within the context of research on people who are incarcerated. The chapter provides a detailed history of the development of ethical research frameworks, including the Nuremburg Code and Belmont Report. The chapter highlights distributive justice as a practice for distributing the benefits and risks of the research equally to improve the welfare of people who are incarcerated.

Source: Institute of Medicine (U.S.) Committee on Ethical Considerations for Revisions to DHHS Regulations for Protection of Prisoners Involved in Research, 2007

A Scoping Review of Qualitative Research Methods Used with People in Prison

An academic article reviewing the ethical complexities that researchers encounter when conducting qualitative research with people who are incarcerated. Researchers conducted a meta-analysis of participant recruitment and data collection processes of 126 qualitative research studies conducted from 2005 to 2017 with people who are incarcerated. The article discusses ethical challenges associated with coercion risk, recruitment, access, privacy, and confidentiality and suggests strategies to mitigate these challenges.

Source: Penelope Abbott, Michelle DiGiacomo, Parker Magin, and Wendy Hu, International Journal of Qualitative Methods, October 2018

Expanding Ethics Review Processes to Include Community-Level Protections: A Case Study from Flint, Michigan

Case study providing guidance on engaging community members in research projects to reestablish trust with those who have historically been harmed in research and data collection. Using research on the water crisis in Flint, Michigan as an example, the article suggests establishing community ethics review boards led by community members to evaluate the ethics of any proposed data collection in addition to an IRB. This practice could be considered

for research with people who are incarcerated to build trust between researchers and members of the community.

Source: Kent D. Key, AMA Journal of Ethics, October 2017

Research Trauma in Incarcerated Spaces: Listening to Incarcerated Women's Narratives

A journal article describing trauma-informed practices for conducting qualitative research with participants who are incarcerated. The author focuses on her experiences interviewing women who are incarcerated and techniques for understanding one's own emotional reactions to their stories. The article discusses the importance of listening to the stories of incarcerated people, confronting personal prejudices and attitudes, and engaging in proactive self-care.

Source: Sibulelo Qhogwana, Emotion, Space and Society, February 2022

Two Regimes of Prison Data Collection

An article reviewing the history of data collection in prisons and describing how the data collected by federal and state prison systems have shaped our understanding of individuals who are incarcerated and can perpetuate bias. In contrast, community-sourced data collection, including data collected by individuals impacted by the system, can deepen our understanding of the causes and consequences of the prison system and the role of structural factors.

Source: Kaneesha R. Johnson, Harvard Data Science Review, July 2021

Participatory Research in Prisons

A resource brief advocating for the use of participatory research methods when conducting research related to prisons. The authors describe best practices for participatory research that are rooted in power sharing, empowered participation, and action. In participatory methods, researchers build relationships with participants who assume the role of "co-researchers", researchers share knowledge of the research methodology and ethics, and both researchers and coresearchers are empowered to take actions that facilitate change. The brief also offers examples of research in prisons that use participatory methods.

Source: Lauren Farrell, Bethany Young, Janeen Buck Willison, & Michelle Fine, Prison Research and Innovation Initiative, April 2021

Conducting Prison Research with a Racial-Equity Frame

A resource brief recommending strategies for using principles of racial equity as the groundwork for research related to prisons. The author emphasizes the need for researchers to critically consider how historical systems and structures shape racial bias in the experience of incarceration today. The brief offers suggestions for inclusive research approaches, including using participatory methods and critically examining the use of race or ethnicity variables in data analysis.

Source: Cassandra Ramdath, Prison Research and Innovation Initiative, January 2021

Surveying Participants to Strengthen Behavioral Health–Criminal Justice Programs

A short guide to gathering participant feedback in behavioral health–criminal justice programs to better understand the quality of service provided and participant experiences. The guide describes key components of participant satisfaction surveys, including assessing the service climate, program delivery, performance, and participant outcomes. Although the guide is geared toward behavioral health programs, it may be a useful tool for evaluating the short-term success of other support services offered to individuals who are incarcerated.

Source: The Council of State Governments Justice Center, June 2021

Reentry Data Collection

Best Practices for Collecting Data from Reentry Populations for Program Evaluation

A resource brief discussing practices for collecting primary data on formerly incarcerated individuals who received reentry services. The authors suggest methods for designing reentry program evaluations, including data collection strategies and instruments. The appendix includes a compendium of survey items for primary data collection with formerly incarcerated individuals.

Source: Christine Lindquist and Sam Scaggs, RTI International and Center for Court Innovation, for the U.S. Department of Justice, Bureau of Justice Assistance, 2022

Ensuring the Confidentiality of Participant Data in Reentry Program Operations and Evaluation

A resource brief describing how to collect personally identifiable information (PII) in reentry program operations and evaluation research. PII may be vital to reentry research, particularly for Second Chance Act grantees who are required to report recidivism performance metrics. The authors accessibly describe the legal and ethical requirements for collecting PII, including release of information agreements, informed consent, and human subjects

research review procedures. They also offer suggestions for the secure storage and transmission of PII in a research context.

Source: Sam Scaggs and Christine Lindquist, RTI International and Center for Court Innovation, for the U.S. Department of Justice, Bureau of Justice Assistance, 2022

Measuring Reentry Success beyond Recidivism

A resource brief that explores the limitations of using recidivism rates as a measure of reentry program success and alternative measures that better capture the multiplicity of the aims of prison and jail reentry programs. The author suggests that researchers use outcome measures that are aligned with the specific aims and activities of a reentry program or service. For example, if a program is geared toward housing stability, researchers should measure housing status, housing type, and/or number and frequency of episodes of being unhoused. The brief also provides examples of three projects that are using multiple measures of participant well-being and stability.

Source: Janeen Buck Willison, RTI International and Center for Justice for Court Innovation, for the U.S. Department of Justice, Bureau of Justice Assistance, March 2023

The Limits of Recidivism: Measuring Success after Prison

A thorough report highlighting the insights of people who have experienced incarceration in developing and implementing new measures of reentry success beyond recidivism rates. The report describes how a focus on using recidivism rates to measure reentry success ignores the structural issues that shape lives after release. It considers how progress in other domains such as education, health, family, and employment is important to the success of returning citizens. The report is available online as a free PDF.

Source: National Academies of Sciences, Engineering, and Medicine, 2022

Disclaimer: Resources listed here provide guidance on conducting research in correctional facilities, but not all use preferred person-first language in discussing the correctional system; see A. Solomon, (2021), What words we use—and avoid—when covering people and incarceration, The Marshall Project, https://www.themarshallproject.org/2021/04/12/what-words-we-use-and-avoid-when-covering-people-and-incarceration.

Appendix F: Working with Institutional Research

Institutions of higher education have offices of institutional research (IR) that oversee the planning, collection, and dissemination of information on students, academic programs, and other aspects of the institution. These offices typically manage the reporting of student and programmatic data required by state or federal government agencies, such as for the Integrated Postsecondary Education Data System maintained by the U.S. Department of Education. Some IR offices also provide faculty and staff with information about students and the effectiveness of higher education programs and can help collect and interpret the data needed for federal and other reporting requirements.

IR offices can assist higher education programs in prisons with accessing and collecting data on their students and programs. IR offices can also help programs meet the data reporting requirements and evaluate program effectiveness, including student outcomes.

What Is Institutional Research?

According to the Association for Institutional Research, the primary role of IR is to provide objective, systematic and thorough research that supports the institution's goals, planning, policy formation, and decision making. Although the scope of IR activities varies by institution, the functions of institutional research can include the following:

- Identifying information needs
- Collecting, analyzing, interpreting, and reporting data and information
- Contributing to operational, budgetary, and strategic planning and program evaluation
- Serving as stewards of data and information
- Educating information producers, users, and consumers

Depending on the institution, IR offices may also coordinate with other offices in the institution engaged in data collection and analysis, such as offices of the registrar, financial aid, and institutional effectiveness.

What Support Can IR Offices Provide for Higher Education in Prison Programs?

Through the functions listed, IR offices can help program staff collect, access, and analyze the data needed to start a program, analyze its effectiveness, and analyze student outcomes, depending on office capacity.

- **Meeting Department of Education regulations for Pell Grants:** IR offices can help program staff interpret and meet federal regulations that require data on programs and students. For example, the IR office could provide data needed for the initial Pell Grant approval process and for determining whether a program is operating in the best interest of students, such as data on instructor qualifications, credentials, and turnover.

- **Meeting accreditation requirements:** Accreditation agencies are part of the process for approving programs to administer Pell Grants to incarcerated students. During higher education in prison programs' initial two-year period of access to Pell Grants, college accreditation agencies evaluate the program and conduct a site visit. At each step, accreditors may request information that IR offices can facilitate access to, such as data on faculty qualifications and workloads, student services, and course and program assessment measures.

- **Access to post-program data on your students:** In addition to collecting data on students while enrolled, some IR offices can access data on students' post-program outcomes even if they do not enroll in your institution after release. For example, IR offices may be able to obtain data on postsecondary enrollment from the National Student Clearinghouse or employment and wage data from state departments of labor. These data can provide insights into student outcomes after they leave your program.

- **Assessing program outcomes/supporting continuous improvement:** Although IR office capacity and staff expertise vary, IR can also assist with collecting survey and other data on students and programs and provide ongoing feedback on student and program outcomes through existing analysis tools, such as dashboards. Some IR offices also have the capacity to conduct in-depth analysis of data on programs and students that go beyond descriptive statistics. These analyses might include assessing the impact of specific program features on retention and completion or comparing the outcomes of different groups of students over time.

- **Access to data from departments of corrections:** To effectively support students who are incarcerated, programs often need information on their students from departments of corrections, such as sentence length and time to release. IR offices can help programs establish a process to access these data and provide examples of data sharing agreements and data sharing templates.

> If the IR office isn't front and center as it is at my campus, faculty may not know what they do. We start programs knowing that we're going to be looking at the data. We don't think of that after the fact. On day one, we ask: How are we going to measure this? How are we going to see if we're successful? We don't just get started and figure that out later.
>
> –*Collin Witherspoon, Executive Director of Institutional Research, Amarillo College*

What Are Effective Practices for Working with IR?

IR specialists emphasize the importance of including IR offices in your program planning, particularly if you anticipate needing support with accessing data to meet regulatory or other requirements.

- **Involve IR early on:** Outreach to IR offices during the planning phase of your program can support effective collaboration and help higher education in prison programs understand and meet federal and other data reporting requirements. IR specialists can advise on effective alternatives to collecting data online and integrating the resulting data into existing data systems and analysis tools, such as dashboards, that can help programs meet data reporting needs and avoid duplicating efforts.

- **Be aware of IR office capacity:** IR offices serve departments and programs across the institution, which entails competing priorities and ongoing reporting deadlines. Programs should consult their institution's IR office to learn what kind of support staff can provide and how much advanced notice is needed for assistance. An understanding of how the IR office manages tasks and planning for collaboration can improve coordination and make it more likely that the IR office will be able to meet your program's needs.

Additional Resources

Association for Institutional Research. (n.d.). Duties and Functions of Institutional Research. Duties and Functions of Institutional Research | AIR (airweb.org)

Baxter, Kaylan. (2020). Accountability During Crisis: The Transformative Potential of Institutional Research and Effectiveness in the Struggle Toward Racial Justice. *The Community College Context. 6*(1)

EvaluATE. (2017). Tips for Working with Institutional Research. 16-minute video on the functions and services of IR

Hyder, Myra. (2023). *Accessing Pell Grants for College Programs in Correctional Settings: A Summary of the Regulations and Requirements*. Vera Institute of Justice. accessing-pell-grants-for-college-programs-in-correctional-settings.pdf (vera.org)

Institutional IR offices typically maintain websites with information about their services and the process for submitting data requests. Examples from institutions participating in Ready for Pell include the following:

Des Moines Area Community College: Office of Planning, Assessment and Data

Herkimer College Institutional Research Department

The Hope College Office of Institutional Research

Portland State University: Office of Institutional Research and Planning

Tulane University: Office of Assessment and Institutional Research

Appendix G: Data Use Agreements

Postsecondary education programs in prisons collect data on their students to inform program planning, assess students' academic progress and outcomes, and meet institution, government, and funder reporting requirements. Also, programs applying to the U.S. Department of Education to become an approved prison education program (PEP) must include documentation in their application showing that their postsecondary institution has entered into an agreement with the oversight entity (typically a state department of corrections [DOC]) to obtain data on the transfer and release dates of incarcerated individuals.[1] To have consistent access to relevant DOC data on students who are incarcerated, especially if the data are not public and use is restricted, postsecondary institutions should establish data use agreements (DUAs), also known as data sharing agreements (DSAs), with their DOC partners.

What Data Do DOCs Collect?

For individuals who are incarcerated, DOCs collect demographic information such as gender, age, and race/ethnicity, and education and training information, including prior educational history, attainment of a high school credential, and participation in cognitive and vocational training programs. The data also include details about their incarceration, such as admission date, expected date of release, release community, employment, transfers and transfer locations, risk and needs scores, and records of disciplinary infractions that may affect program eligibility, participation, and completion. DOCs may also have access to information collected by other state agencies (e.g., community corrections and labor), such as employment after release.

What Is a DUA?

A DUA is a contractual document that governs the exchange and use of data among agencies and organizations. DUAs can be initiated by the postsecondary institution or DOC but should involve the postsecondary institution's institutional research office. On the

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[1] Pell Grants for Prison Education Programs, 87 F.R. § 65426 (2022). https://www.federalregister.gov/documents/2022/10/28/2022-23078/pell-grants-for-prison-education-programs-determining-the-amount-of-federal-education-assistance. To access the text of the legislation and information on regulations for Pell Grants for Prison Education Programs, see https://fsapartners.ed.gov/knowledge-center/topics/prison-education-programs.

DOC side, DUAs may involve inputs and approvals from research, information technology, and compliance offices, as well as legal representatives.

A DUA specifies what data will be shared and requirements around how the data are managed, including:

- how the data can be used and shared and by/with whom;

- data security measures that must be used to prevent an unauthorized use or disclosure;

- requirements for reporting any unauthorized use or disclosure to the data provider;

- the schedule for data sharing; and

- the timeframe that the receiving institution is permitted to retain the data.

Once a DUA is in place, a DOC might share data files on a one-time or regular reporting schedule or provide data system access to a postsecondary institution staff member who, following training, can access data in accordance with the agreement.

Establishing a DUA with a DOC

Because processes for accessing data vary by DOC, the first step toward establishing a DUA is to learn about the process and requirements by meeting with the director of the DOC research office. Information about DOC research offices can typically be found on DOC websites. In preparation for the meeting, it can be helpful to collect information that will be needed for the DUA, such as:

- The types of data that will be requested. For program management and assessing student outcomes and equity, relevant information may include students' prior education, transfers, and release dates.

- Whether identifying information is needed, such as names, birth dates, and unique identification numbers to match the DOC data to data from your institution.

- A brief description of how the data will be used, including the research questions and analyses of interest.

- Who will have access to the data, ideally using job titles rather than staff members' names in case of staff turnover.

- Whether the request is for one-time or multiple data deliveries and the schedule for the data deliveries and destruction procedures once the data are no longer needed. This information might include instructions by data type, such as sharing transfer and release data within a certain time frame so that a financial aid office can take needed actions.

- How the data will be securely transmitted to your program and how it will be stored and protected once in your possession.

How Can DOC Data Be Used?

Data from the New York State Department of Corrections and Community Supervision have helped researchers from the State University of New York's Office of Higher Education in Prison (SUNY) investigate the effects of carceral conditions on student success in postsecondary programs in prison. The office's recent analysis of student outcomes found lower graduation rates among students who experienced transfers across facilities and among students with shorter sentences, who rarely continued their education after release. The evidence supports the study's recommendations for greater cross-facility coordination among postsecondary education programs in prison and for connecting students to college in the communities that they return to.

DUAs can take a few weeks to months to establish because review by multiple offices on both sides is typically necessary and staff capacity may be limited. DOCs may have a preferred DUA template or request that the postsecondary institution supply one. If the DOC is new to data sharing, their data analysts may also need time to establish procedures and determine the programming required to create the data files. To avoid duplication of effort, some DOCs prefer that postsecondary institutions coordinate DUA development through a consortium or data working group or create one DUA that is used by all partners, which may require additional work up front. For example, one DOC in a state with a Ready for Pell grantee is exploring the possibility of creating a single data sharing platform for its postsecondary partners that will be governed by a data trust agreement similar to the Virginia Data Governance Framework.

Postsecondary institutions should keep in mind that flexibility may be needed to meet DOC requirements, particularly if the data requested are not public. For example, if a DOC is unwilling to share identifying information, the DOC may be able to instead receive identifying data from the college, conduct the match, and share deidentified information back.

Additional Resources

Research university websites include additional resources on DUAs, such as how-to guides and templates. For example, Tulane University, a Ready for Pell grantee, maintains a website on DUAs: https://research.tulane.edu/ott/faculty/mtas-duas. Other helpful resources are DOC websites, which typically include research and data resources that postsecondary institutions can use to understand DOC policies, procedures, and available data. The following are examples of DOC websites in states with Ready for Pell grantees:

- Massachusetts: https://www.mass.gov/how-to/submit-an-outside-research-proposal
- Oregon: https://www.oregon.gov/doc/research-and-requests/pages/home.aspx
- Texas: https://www.tdcj.texas.gov/divisions/eas/external_research.html
- Wisconsin: https://doc.wi.gov/Pages/DataResearch/DAIPrimaryProgramming.aspx

The U.S. Department of Education Federal Student Aid Office's Knowledge Center provides information on federal legislation related to Pell Grant reinstatement, as well as a link to the Application for Approval to Participate in the Federal Student Financial Aid Programs: https://fsapartners.ed.gov/knowledge-center/topics/prison-education-programs.

Appendix H: Program Evaluation

An evaluation applies systematic methods to analyze whether a program or intervention achieves its goals and assess what works well and what could be improved. For education programs, evaluations can assess whether a program was implemented as intended and equitably, inform program development or improvements, and assess the effects of the program on student outcomes. For effective programs, evaluations can also provide convincing evidence of a program's value to funders and policymakers. In the past two decades, multiple studies have contributed to a growing evidence base supporting the value of prison education programs for improving post-release employment rates and reducing recidivism[1] that helped build the case for Pell Grant reinstatement.[2]

Evaluations can also examine the effectiveness of program components such as instructor training and student tutoring. In prison settings, an evaluation might assess the effect of work or housing assignments on student participation and success, or whether students continue their education after reentry. This brief describes the most common types of evaluations and factors to consider when planning an evaluation of a postsecondary-education-in-prison program.

Evaluation Types and Designs

The research design for an evaluation depends on the research questions—developed by program staff, funders, and, ideally, program participants—and on the program's stage of development.

Process or formative evaluations assess whether a program is delivered as planned to the intended recipients and can also provide feedback to guide program development and improvement.[3] During the development or implementation of a postsecondary-education-in-prison program, an evaluation of the impact of the program on student outcomes is not feasible because the program may change significantly during implementation and

1 R. Bozick, J. Steele, L. Davis, & S. Turner. (2018). Does providing inmates with education improve post-release outcomes? A meta-analysis of correctional education programs in the United States, Journal of Experimental Criminology, 14(3), 389–428; B. Stickle & S. S. Schuster, (2023). Are schools in prison worth it? The effects and economic returns of prison education, American Journal of Criminal Justice, 48, 1263–1294.

2 G. Robinson & E. English. (2017). The Second Chance Pell Pilot Program: A historical overview. American Enterprise Institute. https://www.aei.org/wp-content/uploads/2017/09/The-Second-Chance-Pell-Pilot-Program.pdf

3 P. H. Rossi, M. W. Lipsey, & H.E. Freeman. (2018). Evaluation: A systematic approach. Sage Publications.

enrollments may be too small to assess program effects. At this stage, a process or formative evaluation can provide actionable insights on implementation successes or challenges and identify equity gaps is design or delivery. For example, a 2020 evaluation of Second Chance Pell pilot programs in Pennsylvania identified Pell Grant eligibility barriers among incarcerated individuals, such as state-imposed restrictions by conviction type, that contributed to lower-than-expected Pell Grant usage.[4]

Summative evaluations (also referred to as outcome or impact evaluations) are conducted once a program has been implemented to assess a program's success in achieving its stated outcomes and overall goals. Although the terms are often used interchangeably, outcome evaluations typically examine progress toward one or more of a program's objectives, whereas impact evaluations seek to determine whether a program has achieved its longer-term goals and ultimate aims.[5] Depending on how a program's outcomes and goals are defined, an outcome evaluation of a postsecondary education program in prison, for example, might analyze whether students continue their education after reentry and the types of students that are more likely to do so. An impact evaluation of the

What is an Impact Evaluation?

The term impact evaluation can be used in different ways. As described in this brief, impact evaluations might examine a program's success in meeting its overall goals and objectives. In some contexts, impact evaluations refer to studies using causal research designs that include treatment and comparison groups, ideally selected through random assignment, to isolate the effects of a program on participants. The Institute of Education Sciences at the U.S. Department of Education, for example, encourages the use of causal or experimental research designs in evaluation studies,[*] and some research organizations and funders set similar standards. Because impact evaluations can differ in approach, program staff should consult with funders and researchers to clarify expectations.

* Institute of Education Sciences (IES). (2017). Evaluation principles and practices. National Center for Education Evaluation and Regional Assistance. https://ies.ed.gov/ncee/projects/pdf/IESEvaluationPrinciplesandPractices_011117.pdf

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[4] S. Tahamont, J. Hyatt, M. Pheasant, J. Lafferty, N. Bell, & M. Sheets. (2022). Ineligible anyway: Evidence on the barriers to Pell eligibility for prisoners in the Second Chance Pell pilot program in Pennsylvania prisons. Justice Quarterly, 39(2), 402–426.

[5] C. Lindquist & A. Martinez. (2020). Improving evaluation readiness for reentry programs. U.S. Department of Justice, Bureau of Justice Assistance. https://nationalreentryresourcecenter.org/sites/default/files/inline-files/evalReadinessBrief.pdf; Rossi et al., 2018; U.S. Government Accountability Office. (2021). Program evaluation: Key terms and concepts. GAO-21-404SP. https://www.gao.gov/assets/gao-21-404sp.pdf

same program might examine whether the program increases participants' reentry success, including degree attainment, employment, and recidivism. An impact study on individuals released from Minnesota prisons, for example, examined the effects of secondary and postsecondary degree attainment during incarceration on post-release employment and recidivism.[6] The analysis found no effects for secondary degree attainment but found postsecondary degree attainment to improve employment outcomes and reduce recidivism. Outcome and summative evaluations can employ a variety of research designs and may include the collection and analysis of qualitative and quantitative data.

Evaluation Readiness

Before undertaking either type of evaluation, researchers and program leaders should work together to determine the research questions that the evaluation will address and the research design and time frame needed to answer them. A process or implementation evaluation can provide insights beginning at the early stages of program development.

Once a program is implemented, supportive conditions and infrastructure can enhance the effectiveness and rigor of a summative evaluation. In 2020, RTI International authored a

resource brief for the U.S. Department of Justice, Bureau of Justice Administration on determining whether a reentry program is ready for a rigorous evaluation of its effects on participant outcomes. These five aspects of evaluation readiness are also relevant for assessing readiness for evaluations of other program types, such as postsecondary-education-in-prison programs.

- **Established program**. Creating or expanding postsecondary education programs takes time and experimentation to determine what is feasible and how best to respond to student needs. As noted above, evaluations of program outcomes or effectiveness are not feasible when a program is still being developed and implemented. If a program changes significantly while an evaluation is underway, researchers will not be able to determine which version of the program influenced student outcomes. During the implementation phase, an evaluation team might help the program development team document the implementation process and lay the groundwork for a future evaluation study.

- **Documented program model**. Planning a summative evaluation typically includes the development of a logic model that describes the input, activities, and intended outcomes of the program to be evaluated. Logic models

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[6] G. Duwe & V. Clark. (2014). The effects of prison-based educational programming on recidivism and employment. The Prison Journal, 94(4), 454–478.

summarize how key program inputs and activities contribute to outputs and short- and long-term outcomes.[7] Logic models include detailed descriptions of program components such as funding and staffing, eligibility criteria, outputs (number of clients enrolled, number of sessions delivered, number of staff trained), goals and objectives, and participant and system-level outcomes.

- **Program size**. Postsecondary programs in prison that serve a few dozen students a year may not have enough participants to support a rigorous evaluation of outcomes or impact. Small sample sizes make it difficult to determine whether program participants have better outcomes than people who do not receive the services. Many postsecondary programs in prison, however, anticipate increasing the number of students that they serve in the next few years with the reinstatement of Pell Grants. Although the number of participants needed depends on the evaluation design and type of program evaluated, an evaluator can help determine how many students are necessary to effectively measure outcomes.

- **Data availability**. Evaluations can include the collection of data and the use of administrative data sources, such as data on the individual characteristics of the students participating in a program and the education and support services they received. These data may include demographic information collected by the department of corrections and the college, which can help identify equity gaps and provide information on students' prior education, projected release date, course taking, and grades. For an evaluation to be successful, organizations that collect data will need to be willing to share the data with researchers, and the data must be of sufficient quality to support an analysis.

- **Leadership support**. Evaluations may require extensive program information, staff time, and access to nonpublic data sources. Accessing the resources needed for an evaluation, therefore, requires leadership support. Do program and organizational directors understand the evaluation and what it entails? Has the evaluation been formally explained? Have program leaders been informed about the potential benefits of the evaluation? Have program leaders been informed about what must be in place for the evaluation to be successfully implemented (e.g., resources, staff time)?

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[7] J. A. McLaughlin & G. B. Jordan. (2004). Using logic models. In J. S. Whorley, H .P. Hatry, & K. E. Newcomer (Eds.), Handbook of practical program evaluation (2nd ed., pp. 62–87). Jossey-Bass.

These conditions require planning and time to meet. In preparation for an evaluation, programs can lay the groundwork by, for example, developing and piloting surveys to collect data on students' education and post-graduation outcomes and begin working with leadership to secure support.

Resources

The following resources provide more information about program evaluations, including equity-based approaches, factors to determine evaluation readiness, and the components and benefits of an evaluation.

Why am I Always Being Researched? A Guidebook for Community Organizations, Researchers, and Funders to Help Us Get from Insufficient Understanding to More Authentic Truth

This guidebook describes an equity-based approach that addresses the unequal power dynamics between researchers and the subjects of research, especially when the focus of the research is on marginalized communities. In addition to describing the ways that research can perpetuate inequities, the resource offers guidance for researchers (and evaluators) on recognizing unintended biases in their work and advice for community members on increasing their engagement and leadership in research and evaluation work.

Source: Chicago Beyond, 2018

Improving Evaluation Readiness for Reentry Programs

This brief describes the factors that program administrators and evaluators should consider when determining a program's readiness for an outcome or impact evaluation. Although the examples in the brief are drawn from reentry programs, the brief highlights programmatic features, such as the size of the population served and data availability, that apply to a wide range of education and social service programming, including higher education in prison programs.

Source: C. Lindquist and Martinez, A., U.S. Department of Justice, Bureau of Justice Assistance, 2020

Reentry Program Evaluation Readiness Planning Guide

A partner publication to Improving Evaluation Readiness for Reentry Programs, this guide provides a tool for assessing a program's readiness for an outcome or impact evaluation. The guide lists the five recommendations for evaluation readiness adapted for

this brief and a set of questions that program administrators and evaluators can ask to determine whether each recommendation has been followed.

Source: C. Lindquist and Martinez, A., U.S. Department of Justice, Bureau of Justice Assistance, 2020

Demystifying Program Evaluation in Criminal Justice: A Guide for Practitioners

Developed by the Illinois Criminal Justice Information Authority and designed for criminal justice practitioners, this article provides an overview of key evaluation terms, concepts, and principles and practical tips for starting a program evaluation. The content describes how program evaluations can improve the efficacy and efficiency of programs and offers guidance on setting evaluation goals, developing logic models, and choosing a research design.

Source: Jessica Reichert and Alysson Gatens, 2019

Program Evaluation Toolkit: A Module Based Toolkit for Professional Development and Program Evaluation

This resource from the U.S. Department of Education offers education practitioners and evaluators practical guidance on conducting evaluations of local, state, and federal programs. The toolkit is composed of eight modules that include step-by-step guidance on different aspects of program evaluation, such as creating a logic model, developing evaluation questions, and reporting findings.

Source: J. Stewart, J. Joyce, M. Haines, D. Yanoski, D. Gagnon, K. Luke, C. Rhoads, and C. Germeroth, U.S. Department of Education, Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance, Regional Educational Laboratory Central, 2021