

Comments received during 60 day public comment period for Pell for Students Who Are Incarcerated Experimental Site Initiative – Docket Number ED-2015-ICCD-0110.

Name of Commenter	Comment	Department of Education Response
Cheryl Holsonbake	<p>Hello. Thank you for the chance to comment on the use of Pell monies for incarcerated individuals.</p> <p>I live in an area with a large inmate population and am excited that these individuals may someday be able to pursue college courses with the help of financial aid! My primary concern is that most of them will have had some type of drug charge in connection with their other offense(s). It is a sad fact that most crime is related in some way to drugs and/or alcohol. If I recall correctly, students with any past drug convictions are typically excluded from receiving federal financial aid. For this experimental site initiative, I'd recommend lifting this requirement in an effort to reach the most people -- those who may need a "second chance" the most.</p> <p>Additionally, if you are choosing areas of the country to pilot the program please consider Kern County, California. We have a low percentage of college educated adults when compared to other California and US communities. Our economy would certainly benefit from any and all education initiatives - especially among those with criminal histories. Businesses here often struggle with finding qualified individuals for even entry-level positions. When individuals leave the federal/state/county prison systems here, they stay and often revert to crime because they have no skills for the jobs that are available.</p> <p>With its mix of public community colleges, a public university with both traditional and online programs, and a good selection of private career</p>	<p>Thank you for your support of this Experimental Site Initiative. The Department has received a great deal of interest in the Second Chance Pell experiment from postsecondary institutions across the country. In the notice that announced this experiment, postsecondary institutions were invited to submit a letter of application expressing interest in participating in the experiment. We are currently in the process of reviewing those letters of interest. Once the institutions have been selected to participate in the experiment, they must partner with Federal or State correctional facilities to provide eligible postsecondary educational programs.</p> <p>To clarify one point of your comment, for an otherwise eligible student to be denied a Pell Grant based on a drug conviction, the conviction would have had to take place while the student was receiving Federal Student Aid. This prohibition does not look back to previous drug convictions that occurred when the individual was not receiving Federal Student Aid.</p> <p>Again thank you for your support of the Second Chance Pell Experimental Site Initiative.</p>

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	<p>colleges, I believe Kern County would be a great fit for this experimental initiative! Thank you for your time.</p>	
Wendy Fast	<p>Education can help the incarcerated to become contributing members of society. Education is a cornerstone for a democracy.</p>	<p>Thank you for your support of this Experimental Site Initiative. The Department has received a great deal of interest in the Second Chance Pell experiment from postsecondary institutions across the country. Once the experiment concludes, Congress will have access to the final data analysis to assist in decisions related to Federal Pell Grant eligibility to incarcerated individuals.</p>
Maddie Neufeld	<p>I worked in a college in prison program through Wesleyan University and saw firsthand the ways in which a quality college education can be so transformative. The incarcerated students gained both academic skills -- a critical lens for understanding and interpreting the world around them -- and a newfound identity; they came to see themselves as scholars rather than criminals. The students had an incredible passion for learning, and took ownership of their studies in a way that few main campus Wesleyan students did. The program has an incredibly low reentry rate for released students. For these reasons, among others, the Second Chance Pell should be more than a pilot program; Congress should and reinstate Pell grant eligibility for all incarcerated individuals!</p>	<p>Thank you for your support of this Experimental Site Initiative. The Department has received a great deal of interest in the Second Chance Pell experiment from postsecondary institutions across the country. Once the experiment concludes, Congress will have access to the final data analysis to assist in decisions related to Federal Pell Grant eligibility as it relates to incarcerated individuals.</p>
Kevin Tran	<p>After doing some research, I fully support education programs in prisons. Incarcerated individuals who want to enrich their lives and have a sense of pride and purpose can find that through education. By receiving an education, incarcerated individuals will be able to learn valuable skills</p>	<p>Thank you for your support of this Experimental Site Initiative. The Department has received a great deal of interest in the Second Chance Pell experiment from postsecondary institutions across the country. Once the experiment concludes, Congress will have access to the final data</p>

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	<p>that they can use in the work force. Employers are always looking for individuals with skill sets and this is something that can help them become more successful and financially independent. Based on some statistics, there are low reentry rates for those who receive an education. Since it is very expensive to keep individuals in prison, The Second Chance Pell grant is well worth the investment to give them the resources to receive an education. In this situation, everybody wins!</p>	<p>analysis to assist in decisions related to Federal Pell Grant eligibility as it relates to incarcerated individuals.</p>
<p>William Loflin</p>	<p>It is very appropriate that this initiative is also referred to as the Project Second Chance Pell Initiative. We are a country of second chances. Most of my experience has been in a community college. We often abbreviate our name using two "Cs." Maybe the two "Cs" should stand for two chances.</p> <p>I have been involved in correctional education for many years, and, yes it has its strong opponents. Many have asked me why prisoners should be given the opportunity to obtain a college education. Many community college students are in college for a second chance of one form or another. Why should we not provide the same opportunity for those in our correctional facilities? By reinstating Pell Grant access to prisoners, we provide these individuals the same access to higher education we provide to others seeking second chances.</p>	<p>Thank you for your support of this Experimental Site Initiative. The Department has received a great deal of interest in the Second Chance Pell experiment from postsecondary institutions across the country. Once the experiment concludes, Congress will have access to the final data analysis to assist in decisions related to Federal Pell Grant eligibility as it relates to incarcerated individuals.</p>
<p>Sherri Caldellis</p>	<p>I fully support bringing back Pell grants for prisoners. In my opinion this decision is years overdue. We know that higher education has a direct impact on recidivism. We know that many of these men and women have a release date and will</p>	<p>Thank you for your support of this Experimental Site Initiative. The Department has received a great deal of interest in the Second Chance Pell experiment from postsecondary institutions across the country. Once the experiment concludes, Congress</p>

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	<p>re-join society. We know if they are not given the tools or skills to gain knowledge and higher education there is a very high likelihood that they will reoffend and return back to prison. How can it be fair to tax payers to imprison more people than any other country in the world? I say this is simply one small step that is fair to the tax payers. It is simply the right thing to do!</p>	<p>will have access to the final data analysis to assist in decisions related to Federal Pell Grant eligibility as it relates to incarcerated individuals.</p>
<p>May Lim</p>	<p>As a university student, I know what it is like to have someone invest in me - to have parents and teachers who genuinely care for me and who have contributed to my success since I was born. I know what it is like to have the option of pursuing an education and to have the means to actually do so. I know what it is like to see the world through a different lens after an enlightening lecture or philosophical discussion, as though I myself had just stepped out of Plato's allegorical cave.</p> <p>Education has always been a large part of my life. I have always assumed that I would one day graduate from high school and attend university without giving it a second thought. Yet, on a daily basis, I have failed to realize that, compared to thousands of people in this country, I live a life of privilege that most have never experienced. An alarmingly large number of these people form a particular group that is almost invisible. They, the prison population, are often shoved into dark corners, intentionally forgotten, and labeled as outcasts.</p> <p>Through an internship for a county councilmember who is a long-time civil rights activist and firm advocate for social justice in our community, I have gained a keener awareness of</p>	<p>Thank you for your support of this Experimental Site Initiative. The Department has received a great deal of interest in the Second Chance Pell experiment from postsecondary institutions across the country. Once the experiment concludes, Congress will have access to the final data analysis to assist in decisions related to Federal Pell Grant eligibility as it relates to incarcerated individuals.</p>

	<p>the problems faced by the prison population during incarceration and after release. Recidivism rates have decreased 44% for prisoners who have received a college education during incarceration, yet legislation exists that prohibit Federal Pell Grants from being distributed to prisoners. Information like this shows me, all too clearly, major discrepancies in America's criminal justice system.</p> <p>As the chair of a student organization on campus that is focused on promoting and increasing access to prison education, I have received multiple opportunities to visit prisons and jails in Washington State. I have always considered education to be a basic human right, yet when I first entered a prison, I sensed that this was not the case behind bars. I have witnessed firsthand how education has the amazing power to help prisoners find their true identities. Through engaging discussions in my mixed-enrollment Honors class, half of which was comprised of prisoners, it became very apparent that many have decided to no longer be defined by the term "criminals," but instead as "scholars." I was constantly impressed by my classmates, who were regretful of their pasts and hopeful of their futures. The value of education inside prison was made clearest to me when, in a class dialogue with a state legislator, one student from the prison said, "If incarceration is a disease, education is the cure."</p> <p>I recognize how fortunate I truly am to have the freedom to decide my future. It is this sentiment that drives my desire to provide prisoners with</p>	
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	<p>necessary tools to achieve the same success I have found. Long ago, someone made an investment in me. This is why I urge you to invest in these prisoners by lifting the statutory ban on incarcerated individuals for receiving Federal Pell Grants to help fund their postsecondary educational programs.</p>	
<p>Kevin Rose</p>	<p>(1) Is this collection necessary to the proper functions of the Department Collecting data on student performance is imperative to gaining support to lift the ban on awarding Pell to incarcerated students. Institutions should be expected to report on performance and through their partnership with corrections report on recidivism rates of their students.</p> <p>(2) will this information be processed and used in a timely manner I assume that if the annual data can be submitted and reported back out to Pell grant issuing institutions, that would be sufficient time. Reporting on degree programs and what is translating to actual job placement would be very helpful.</p> <p>(3) is the estimate of burden accurate I think 75 hours per site would be sufficient to cover reporting needs.</p> <p>(4) how might the Department enhance the quality, utility, and clarity of the information to be collected Categorizing degree programs into larger areas such that are used for TRiO APR as well as identifying outcomes for students when possible: graduation, job placement, recidivism, parole, etc...</p> <p>(5) how might the Department minimize the burden of this collection on the respondents, including through the use of</p>	<p>Thank you for your comments regarding the information collection instrument for the Second Chance Pell Experiment under the Department of Education’s Experimental Sites Initiative. The Department has received a great deal of interest in the Second Chance Pell experiment from postsecondary institutions across the country. In the August 3, 2-15 Federal Register Notice that announced the Second Chance Pell Experiment we note some of the requirements of the experiment which include some of items that you mentioned. These requirements include that IHE’s partner and work closely with correctional facilities for areas such as academic programs, applying for federal student aid, and plans for academic and career guidance. We will work closely with stakeholders to address many of the additional concerns you provide in your comments.</p>

	<p>information technology.</p> <p>I think releasing expected APR requirements two months prior to them being due would be sufficient lead time unless expected reporting requirements deviated greatly from original expectations. Using a web based tool would be helpful.</p> <p>Side note: It will be helpful for the department to provide regulations to allow HE institutions to prevent from issuing Pell refunds to students - rather either by reducing awards or sending refunds back to the Department. This would prevent issues with students gravitating toward Pell for the wrong reasons while incarcerated and/or causing additional security issues for DOC's to deal with.</p> <p>After working with incarcerated populations over the last few years there are a few more things I believe should be considered for IHE's granting Pell to incarcerated students.</p> <p>A requirement for dedicated staff/administration be provided by IHE in order to ensure quality educational and vocational opportunities and the ability to coordinate programming with corrections given that these programs are usually much more difficult to implement than on-campus services. Optional considerations should challenge IHE's to partner with their corrections orgs to find solutions for providing opportunities to access technologies for their studies and to find ways to improve communications between IHE, Corrections and participating students.</p> <p>Requirements that Pell programs for incarcerated students have objectives of degree completion, certification or</p>	
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	<p>licensing of some sort. Challenge corrections to provide priority of educational spaces for degree completion or vocational awarding programs over other higher ed opportunities that will not result directly in degree, certificate, license or skill completion.</p>	
<p>Vera Institute of Justice</p>	<p>The Vera Institute of Justice has the following comments on the Second Chance Pell Pilot Program information collection instrument. Program Description Section (a)(ii)(4) "A list of required and elective courses that will be offered as part of the program" The Department of Education (ED) should include whether they are transferrable to other postsecondary institutions. (a)(iii) "For career-oriented training programs, provide data indicating how the program aligns with high-demand occupations. Data can include evidence of employer demand, industry and/or current or expected job demand growth, etc." ED should provide concrete examples of the types of information or resources that are acceptable as data for this, such as newspaper articles or web based content. (a)(v) "Describe how students' readiness for postsecondary coursework will be determined and what, if any, remedial or supplementary instructional services will be provided to ensure the incarcerated students served will be able to benefit from the postsecondary education and/or training provided." ED should clarify that the postsecondary education/training referenced here is credit-bearing or credential purposed education.</p>	<p>Thank you for your comments regarding the information collection instrument for the Second Chance Pell Experiment under the Department of Education's Experimental Sites Initiative. The Department has received a great deal of interest in the Second Chance Pell experiment from postsecondary institutions across the country.</p> <p>Considering the variety of institutions and programs that may participate in this experiment, as well as the variety of correctional institutions and student demographics, the instrument did not provide narrow or specific questions and inquiries. Rather, the information collection instrument seeks to obtain from institutions their individual visions of their programs. However, we have updated the instrument to include information on community organization partnerships, providing documentation if available, criteria for students accepted into the programs.</p> <p>We also believe that some of the comments you provided may be beneficial to include during the evaluation stages of their experiment. As a result your comments have been forwarded to the appropriate office for future consideration.</p>

	<p>(a)(vi) "Describe how the institution, in collaboration with a federal or state penal institution, will provide academic and career guidance as well as transition services to incarcerated students in order to support successful community reentry." Institutions should describe plans for how they will engage additional reentry partners (i.e., reentry organizations, post-release supervision agencies, community-based organizations, workforce development agencies, employers).</p> <p>(a)(viii)(3) "Will students be able to transfer their earned credits to another postsecondary institution? What, if any, additional steps would students have to take in order to receive transfer credit?" ED should ask institutions to list all articulation agreements that they have with other postsecondary institutions and indicate whether courses offered to students in prison are included under these agreements. Student Admission and Support Services Section</p> <p>(iii) "Describe how the institution will determine which incarcerated students will be admitted into the program" ED should ask institutions to describe their recruitment strategies (i.e., presentations to GED or HSE students, outreach to students in prison) and application process (i.e., application forms, essays, interviews, test scores, credentials). Penal Institution Information Section</p> <p>(c) "Please include information about additional necessary security, staffing, and budget changes as well as other additional necessary accommodations." It is unclear what precisely ED is</p>	
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	<p>looking for from penal institutions; more clarification and concrete examples are needed.</p> <p>(d) "Describe any policies that the participating penal institution(s) has in place that may limit the participation of otherwise qualified students."</p> <p>Ask penal institutions and partners to list policies that will address this (i.e., transfer holds, study space, congregate housing for students, additional support from education staff such as tutoring or library access, offering day and evening class times for maximum participation, access to educational technology such as computer labs or internet access).</p>	
<p>Gary Cale</p>	<p>I would like to comment on the necessity of programmatic and administrative support on both sides of the equation, but in particular on the higher education side. To offer a successful postsecondary programs inside carceral [sic] settings requires extensive preparation, maintenance, and evaluation; in essence, the higher education institution will be creating an extension campus with all the same needs and requirements of a traditional campus. First, program directors must create a comprehensive program leading, when possible, to certificate or degree completion. A robust offering of courses should satisfy students who plan on finishing associate or baccalaureate degrees and those who plan on entering the workforce upon release. Often, the courses offered and the materials used in those courses--must be negotiated with Corrections administrators. What is approved one semester may not be the next semester. Second, program</p>	<p>Thank you for your comments regarding the information collection instrument for the Second Chance Pell Experiment under the Department of Education's Experimental Sites Initiative. The Department has received a great deal of interest in the Second Chance Pell experiment from postsecondary institutions across the country. We will work closely with stakeholders to address many of the areas your comments mention such as programmatic and administrative requirements, needs, and support.</p>

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	<p>directors must ensure that the courses offered meet and exceed the standards of classes taught outside the walls. At present, safety and security concerns preclude internet access, for instance, requiring program directors, in collaboration with instructors, to modify existing materials to work within the carceral [sic] learning environment. Third, program directors must insure that faculty are both properly credentialed to teach the courses offered, but perhaps as important, attitudinally prepared to teach inside a correctional facility. To ensure the latter, program directors must offer faculty training, remediation when necessary, and support. Part of the training will necessarily require collaboration with Corrections. Program directors will also need to coordinate with other departments on the regular campus including financial aid, student services, library services, and information technology, to name but a few. In short, dedicated programmatic and administrative support is vital to insure that a quality program of postsecondary education will be provided to incarcerated students.</p>	
<p>Christopher Scott</p>	<p>Due to the length of the comments please refer to document ED-2015-ICCD-0110-0015 for the complete submission. Below are the abbreviated recommendations. . . RECOMMENDATIONS 1. Include additional requirements in the Second Chance Pell Survey Instrument to ensure that applicants have the existing infrastructure, supports, and partnerships necessary to provide incarcerated students with quality instruction and employment opportunities. A. Require participating institutions to</p>	<p>Thank you for your comments regarding the information collection instrument for the Second Chance Pell Experiment under the Department of Education’s Experimental Sites Initiative. The Department has received a great deal of interest in the Second Chance Pell experiment from postsecondary institutions across the country. We do believe that some of the comments you provide may be beneficial to include during the evaluations of the experiment. As a result, your comments have been</p>

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	<p>describe the level of on-site materials and technology available for post-secondary education/training programs</p> <p>B. Require participating programs to detail how in-person and correspondence programs would operate</p> <p>C. Require institutions with existing partnerships with employers to show how they will include incarcerated students in existing programs</p> <p>D. Ensure that participating programs have in place a mechanism for transfer of credits</p> <p>E. Ensure that instructors teaching incarcerated students have demonstrated teaching experience and credentials comparable to higher education faculty</p> <p>F. Ensure that participating institutions can demonstrate access to technology:</p> <p>G. Promoting Partnerships and Memoranda of Understanding (MOUs) between postsecondary institutions and correctional facilities</p> <p>H. Existing educational/training programming (not just post-secondary)</p> <p>2. Programs must be made available and accessible to as many incarcerated students who wish to participate as possible.</p> <p>3. Ensure that student records, transcripts, degree status, and completion progress are available upon request and in a timely manner to incarcerated and released students.</p> <p>4. Develop resources, infrastructure and standards to help connect incarcerated and released students with local community-based and national education and reentry programs.</p> <p>5. Programs should offer education and training for a variety of occupations, particularly high demand occupations from which students would not be barred due to their criminal record.</p> <p>6. Institutions and facilities participating in the ESI should collect</p>	<p>forwarded to the appropriate office for future consideration.</p>
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	and report data on student outcomes.	
Heather Gay	Prisoner Education in Michigan is a, "Pathways from Prison to Post Secondary" grant recipient. The intent of this movement has been to develop a systematic change that enables offenders to initiate postsecondary education while incarcerated, to assist them in taking their first steps toward higher education and successful reentry into our communities. I continue to witness the role that Postsecondary Education plays in preparing offenders for success. It has been a culture change! I can't imagine the profound impact that Experimental Pell will have on our nation's Correctional systems.	Thank you for your support of this Experimental Site Initiative. The Department has received a great deal of interest in the Second Chance Pell experiment from postsecondary institutions across the country. Once the experiment concludes, Congress will have access to the final data analysis to assist in decisions related to Federal Pell Grant eligibility to incarcerated individuals.
Ronald Day	Funding college prison programs through Pell grants are indisputably a cost-effective means of reducing recidivism and achieving public safety. But they do something else - something equally significant. They send a message that America is ready to acknowledge that its historically punitive, restrictive, and non-rehabilitative approach to incarceration is antiquated and ineffective. Reinstating Pell (and Tap grants for that matter) sends the message that we, as a society, are willing to own the failures of our public school system, and demonstrate that we truly believe in Second Chances. Moreover, college prison programs is one small but significant step in stopping the "revolving door" that so many criminal justice-involved individuals go through when they reenter society with little-to-no-education or marketable skills. People make bad choices, politicians	Thank you for your support of this Experimental Site Initiative. The Department has received a great deal of interest in the Second Chance Pell experiment from postsecondary institutions across the country. Once the experiment concludes, Congress will have access to the final data analysis to assist in decisions related to Federal Pell Grant eligibility to incarcerated individuals.

	<p>are people, therefore politicians make bad choices too. I remember the day in 1994 when that bad choice resonated through the prison system. I remember vividly because my educational odyssey began in prison. I entered the system with only a GED, but enrolled in college almost immediately after arriving at Sing Sing Correctional Facility. I was able to earn fifty-one college credits before the funding was cut, but it was disheartening to know that the rug had been snatched out from under me and others. However, my desire and commitment to earn a college degree never waned. Since my release eight years ago, I completed my Bachelor's in Science degree, graduated with a Master's Degree with Honors, and am now a fourth year criminal justice doctoral student. And I taught for six semesters in the Master's in Public Administration program at John Jay. I fret to think how different my life would be without education.</p> <p>At the Fortune Society, I interact regularly with people who did not have access to higher education while incarcerated struggle now to catch up. Their desire to achieve and thoroughly reintegrate into society is tremendous. However, their ability to focus on higher education when there are so many competing priorities often makes the process particularly challenging. Pell Grant programs in prison are an established, cost-effective, and tested means of preparing people returning to society for the demands of maintaining a crime-free, productive life. Even though it was taken away from me twenty-one years ago, I know that my own experience as a Pell Grant</p>	
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	<p>beneficiary set me on the career path where I stand today.</p>	
<p>Daniel Karpowitz</p>	<p>Thank you for the opportunity to comment on the Second Chance Pell Experimental Sites Initiative.</p> <p>With regard to I.c.3: Most existing programs have struggled to support postsecondary education for incarcerated adults over the past two decades, and funding for these programs is likely to remain highly uncertain in the future. Many exemplary programs have been precariously funded through private philanthropy. Those programs typically exist on a semester-by-semester basis, struggling to meet expenses and payroll, and they should not be penalized for initiative or past effort. Without any government support, these institutions continue to lack any certainty about how they will be sustained from one fiscal year to the next. In the absence of state or federal legislation to the contrary, this will remain the case.</p> <p>In this context of existential doubt, any and all Pell funding would and should be considered supplemental.</p> <p>The Department’s concern under I.c.3 should be focused exclusively on not supplanting structural, state-level public funding or other sources of funding that are committed to institutions on a long-term basis. In assessing whether or not Pell experimental funding is supplanting existing financial support, the Department should not calculate charitable gifts, philanthropy, or other insecure and unpredictable sources of funding that provide institutions little in the way budgetary certainty.</p>	<p>Thank you for your comments regarding the information collection instrument for the Second Chance Pell Experiment under the Department of Education’s Experimental Sites Initiative. The Department has received a great deal of interest in the Second Chance Pell experiment from postsecondary institutions across the country. We will work closely with stakeholders to address many of the areas your comments mention such as supplanting existing financial support and institutions of higher education’s partnerships with correctional facilities.</p>

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	<p>Any alternative approach effectively penalizes charitable giving and the efforts to engage private money. It would in fact undermine the long-term sustainability of programs during and beyond the Pell experiment.</p> <p>With regard to 2.b: All college-in-prison programs rely on the cooperation and endorsement of correctional authorities, without which they would not exist. Given the unique opportunity created by the Second Chance Pell Experiment, it is important to ensure that the Department of Education maintains appropriate influence in the selection of educational programs and providers. We suggest that the Department of Education select experimental programs on its own assessment of the merits of the various proposals it has received from IHEs. Corrections officials and/or state executives could then decide whether or not to partner with such programs.</p> <p>The Pell experiment will yield preferred outcomes if the Department of Education grants opportunities for funding based on educational merit and experimental utility, and leaves access to the prisons for those IHEs to negotiate following the selection process. Educators will be empowered, prisons transformed, and outcomes improved if negotiations between correctional authorities and educators take place after, and not before, decisions by the Department of Education.</p>	
<p>Bianca Van Heydoorn</p>	<p>As a provider of a college program in correctional setting, we congratulate</p>	<p>Thank you for your comments regarding the information collection</p>

	<p>the DoE on its effort to expand access to higher education. The comments below are from our experience doing the work on the ground, engaging in collaborative learning with our colleagues and conducting research on college access for people with criminal records.</p> <p>I. (a) (Page 1): We firmly believe that diversity and quality of programs should be the primary elements that are considered when evaluating sites. On quality, DoE should look at whether applicants: (a) offer credit-bearing courses (b) are an accredited academic institution (c) are credits transferrable (e) are courses applicable to a degree program? (f) have intentional connections to the institution and other supports in the community. DoE should also consider a diversity of program models and foci, including degree granting programs, reentry based models, industry-recognized certificate programs that are connected to accredited colleges. There should also be consideration for diversity within the students served: length of sentence, age, demographics, etc.</p> <p>I. (a) (viii) (Page 2): DoE should seriously consider whether barriers exist for students enrolling in the college when they are in the community. Will they be asked to disclose their criminal record? From both our research and practice experience, having to disclose a criminal record during the application process has a chilling effect on students in that it communicates that students with those experiences are not welcomed by the institution. Instead, it would be helpful to ask institutions with those policies to</p>	<p>instrument for the Second Chance Pell Experiment under the Department of Education’s Experimental Sites Initiative. The Department has received a great deal of interest in the Second Chance Pell experiment from postsecondary institutions across the country. We have considered many of your comments and will address them in the implementation of the experiment.</p>
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	<p>articulate the university's commitment to diversity on campus and how they will create a welcoming environment.</p> <p>I. (b) (i) (Page 3): Incarcerated students will have multiple barriers to completing the FAFSA. First, most correctional institutions do not have the internet. Completing the paper application will create a logistical challenge that will be long and require additional staff time for the academic or correctional institution. Second, lack of access to important financial information/documentation will pose a significant challenge to young adults who need parent's financial information and those who are chosen for the verification process after submitting an application. Potential students may not be able to complete the application process because they do not have the means to obtain the necessary proof of their eligibility. Under these circumstances, students may not be able to receive Pell grants, but could potentially still participate in the programs with funding from other sources.</p> <p>I. (c) (iii) (page 3): There are costs associated with administering a college program in a prison setting that do not occur with traditional programs on campus. For example, there are considerable travel, staffing and administrative costs that are directly related to running an off-site project. As a reentry based model, we also incur costs associated to ensuring supportive connections are made for our students to reentry organizations that assist them in making a successful transitions to the community. The opportunity for access to Pell Grants would allow us</p>	
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	<p>to enroll a greater number of students, but would also increase the associated costs mentioned above. The ability to shift existing resources to the costs associated with operating a program in prison should be considered supplementing and not supplanting existing funding. We encourage DoE to think broadly about how programs respond to this question and consider how programs might use existing resources to assist with the administration of programs, create more robust opportunities for students and/or respond to the increased capacity made possible by Pell Grants for their students.</p> <p>II. (d) (Page 3): While it is great that DoE recognizes that correctional institutions pose limitations on the breadth and scope of college programs, it is important to note that those limitations may not have an impact on the quality of the programs provided. An institution with significant barriers should not be held against an applicant. In fact, it is often those providers who are pretty skilled at creating programs that are innovative and creative out of the necessity of operating in such an environment. It is also important to note that usable classroom space is a common limitation posed by correctional institutions. We have heard in multiple conversations (including the most recent annual conference of college in prison providers) that student enrollment numbers are capped by the space that the facility has available. This will undoubtedly have an impact on the number of additional students some providers can enroll if they receive Pell Grant waivers. Considering the limitations on space should also be</p>	
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	factored in when evaluating section III. Student Information (b).	
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