Commenter: The Institute for Higher Education Policy (IHEP)

#	Comment Summary	Response
1	**Student Success** includes several currently required metrics, as well as data on credit completion, graduation, demographics, recidivism, and employment following release. To provide the necessary context for student success metrics, revised ESI reporting requirements should include questions addressing: • Retention • Transfer rates • Employment rates following release • Income following release • Disciplinary history of justice-involved students while incarcerated • Prior college experience	The Department will make no change to the data collection based on this comment. FSA will obtain information regarding retention and transfer rates through existing data systems available to us, such as NSLDS. FSA appreciates the idea regarding obtaining information on disciplinary history, however, FSA does not think this is something we will be able to obtain. FSA will explore options to collect this information, if possible.
2	**Academic Quality** metrics ensure quality is consistent across HEP and non-HEP programs by comparing materials from courses across both types of campus. Revised requirements should include questions addressing: • Experience and expertise of faculty	FSA appreciates this comment and has added a question about the experience and expertise of faculty to the school survey. **New SCP Question #28:** Please describe the credentials of the instructors of the postsecondary courses offered to students participating in this experiment.
3	**Academic Quality** metrics ensure quality is consistent across HEP and non-HEP programs by comparing materials from courses across both types of campus. Revised requirements should include questions addressing: • Course materials and learning outcomes • Rigor of course assignments • Grading policies	The Department will make no change to the data collection based on this comment. Evaluating course materials, rigor, and grading policies is beyond the scope of this experiment.
4	**Civic Engagement** includes metrics many colleges and universities have begun collecting and reporting on for all students. They focus on how students become global citizens on campus and in their communities. Revised requirements should include questions addressing: • Community involvement • Understanding of social issues • Mentorship and leadership • Intercultural competency	The Department will make no change to the data collection based on this comment. Evaluation of Civic Engagement is beyond the scope of this experiment.

5	**Soft Skill Development** metrics capture the soft skills developed through higher education that are needed in the workforce. Revised requirements should include questions addressing: • Hope • Communication • Time management • Open-mindedness • Ability for change	The Department will make no change to the data collection based on this comment. This is currently outside the scope of the experiment. However, because the change in legislation allowing incarcerated individuals to be eligible for Pell (beginning July 1, 2023), the Secretary or other evaluators may look at Soft Skill Development in the future.

Commenter: New America

#	Comment Summary	Response
1	Loan Counseling (Pages 4-7)	The Department will make no change to the data collection for the Loan Counseling experiment based on these comments. The Department has made the decision to end the Loan Counseling experiment on 06/30/21, therefore, the additional burden associated with additional questions regarding Loan Counseling at this time would not yield sufficient information to be evaluated.
2	Consideration of the Restoration of Pell Grants to Incarcerated Students in the December 2020 Law (Second Chance Pell, page 8)	The Department will make no change to the data collection based on these comments. The Department is currently evaluating the requirements for the FAFSA Simplification Act and working with the Institute of Educational Sciences to contract with an external evaluator, as described in the law. Additional questions related to the restoration of Pell for incarcerated students will be included in a future information collection request.
3	The Department should incorporate a new question asking about the main reasons that prospective students struggled to or did not complete the FAFSA. (Second Chance Pell, page 9)	The Department appreciates this comment and has added a question about potential applicants' difficulty with the FAFSA to the school survey. **New SCP Question #29:** What difficulties did applicants face when attempting to complete the FAFSA? Check all that apply: A. Students had trouble obtaining tax

		documentation for themselves B. Students had trouble obtaining tax documentation for their spouse or parents C. Students had trouble obtaining identification documentation (for all students, but disaggregated particularly for students who were juveniles sentenced as adults) D. Students had trouble obtaining documentation for failure to register for the Selective Service E. Students who are asylees had trouble obtaining documentation confirming eligible noncitizen status F. Students had trouble regaining Title IV eligibility after defaulting on student loans or receiving an overpayment of Title IV grant funds G. Students lacked Internet access to complete the FAFSA and/or obtain needed paperwork H. Students declined to complete the FAFSA I. Other (please specify)
4	The Department should also ask, or calculate based on its own available data, an estimate (by percentage bracket: 0-10%, 11-20%, 21-30%, etc.) of the percentage of students completing the FAFSA who were selected for verification in each program and nationally. (Second Chance Pell, page 9-10)	The Department will make no change to the data collection based on this comment. The Department maintains information on selections for verification and does not need to obtain this information from participating schools.
5	We recommend adding the following challenges we gathered in our research of interviews, observations, and focus groups of over 200 individuals directly impacted by college in-prison programs (including currently incarcerated students).[11] A. Finding adequate classroom space B. Incarcerated students leaving the program for other reasons (such as schedule-conflicts with prison jobs, other mandatory programming, etc.) C. Limitations because the correctional facility is	The Department will make no change to the data collection based on these comments. However, the Department is planning to convene focus groups at its annual FSA Training Conference where these challenges can be addressed.

	located in a remote area D. Implementation of "education holds," which permit students to avoid transfer to another facility while they are enrolled in the program E. Cultural conflicts or lack of buy-in from correctional staff (e.g. correctional officers) F. Need to modify course offerings for incarcerated students in certain degree programs due to security or other constraints (Second Chance Pell, page 10)	
6	On current question #22, the Department asks about ways in which the correctional facility limits incarcerated students from participating in the experiment. We recommend several changes to this item. First, the experiment already requires the participating institutions of higher education to provide a priority to students who are eligible for release within five years of participation; thus, we expect that most facilities are already incorporating that restriction. A more interesting response might include gradations within that category. For instance, the Department could break that response into two or three suggested responses. Those might include: ● Based on time until scheduled release (within two years); and ● Based on time until scheduled release (within two to five years). (Second Chance Pell, page 10)	The Department appreciates this comment. Additional options have been added to question 22. **Edited SCP Question #22:** Does the correctional institution prohibit otherwise eligible incarcerated students from participating in the experiment? Yes/No - if "Yes" How does the correctional institution limit participation in the experiment? Please check all that apply. ❑ Categorically-based, all prisoners who committed violent infractions during incarceration. ❑ Categorically-based, all prisoners who had committed a given number of infractions. ❑ Categorically-based on time until scheduled release (such as within 5 years of scheduled release). ❑ Categorically-based exclusion on the type of offense (such as a sexual offense)Individually-based on the specific combination of factors within a given inmate. ❑ Other please specify:
7	We also suggest incorporating another response that does not relate to students' past crimes or sentences, such as employing a waiting list, which we believe is a common practice among participating facilities and which was identified by at least one official in the Department's Second Chance Pell report.	The Department does not believe it could collect reliable data at the individual student level, but a new question has been added to the school survey to collect at the institutional level. **New SCP Question #30:** Were you able to

	(Second Chance Pell, page 10)	enroll all students who expressed interest and were eligible to participate in Second Chance Pell? (Yes/No) If no Why not? Check all that apply: a. Lack of staff resources b. Lack of classroom space c. Other. Please describe:
8	We also recommend adding a new question to the school survey that includes detailed information about the communications that schools have had with prospective students. Specifically, we recommend asking institutions for a brief description of the information they provided to prospective students on each of the following issues: A. Second Chance Pell and the nature of the experiment B. How the institution intends to transition programs to the full authorization of prison education programs when the new law takes effect, including communicating with students and obtaining necessary approvals C. FAFSA and associated requirements D. Verification and associated requirements E. Post-release work opportunities (including potential licensure challenges) F. Credit transfer opportunities (including into new programs and post-release) G. The impact of transferring prison facilities H. Lifetime eligibility restrictions of the Pell Grant (Second Chance Pell, page 10-11)	The Department appreciates this comment and has added a question about communication with prospective students to the school survey. **New SCP Question #31:** Please provide a brief description of the information you provided to prospective students on each of the following: A. Second Chance Pell and the nature of the experiment B. Post-release work opportunities (including potential challenges related to professional licensure) C. Credit transfer opportunities (including into new programs and post-release) D. The impact of transferring between prison facilities E. Lifetime eligibility restrictions of the Pell Grant
9	First, we recommend including sufficient detail to calculate students' trajectory of credential programs. That includes measuring how many students pursued multiple credentials and at what levels. The data held by the Department may be sufficiently detailed to answer this question; or it may simply make sense to collect the number, order, and credential level of credentials earned and/or programs pursued for each student. (Second Chance Pell, page 11)	The Department will make no change to the data collection based on this comment. FSA uses data from other sources to address this topic.
10	The Department should request data sufficient to	The Department will make no change to the

	answer whether the participant was ever released and, if so, whether the person has remained out of prison. (Second Chance Pell, page 11)	data collection based on this comment. Schools participating in the Second Chance Pell experiment would not have this information.
11	Specifically, the Department should ask about *actual* credit transfer, rather than credit transfer agreements in place. Institutions participating in the experiment are required to accept the dual enrollment credit as regular postsecondary credit at their own institutions;[14] so the Department should ask about the number of students who, after completing high school, enrolled at the institution; and how many (and what percentage of) dual enrollment credits were accepted for students. (Dual Enrollment, page 12)	The Department will make no change to the data collection based on this comment. Schools participating in the Dual Enrollment experiment would face substantial burden to collect/report this information for previous year students.
12	Additionally, the Department should ask that institutions report, to the extent they know, the number of students who enrolled at another institution following high school graduation, and the number and share of credits they were able to transfer. (Dual Enrollment, page 12)	The Department will make no change to the data collection based on this comment. Schools participating in the Dual Enrollment experiment would face substantial burden to collect/report this information.
13	The Department could also help to facilitate responses to this question by identifying students' subsequent enrollment as Title IV students in other institutions, potentially even conducting a survey of those students itself. (Dual Enrollment, page 12)	The Department will make no change to the data collection based on this comment. The department will be able to monitor future Title IV aid receipt (enrollment) at any Title IV institution with existing data, but conducting a survey of these students is beyond the scope of our efforts.
14	The experiment "prohibit[s] the use of Federal Pell Grant funds for remedial coursework taken by students who are enrolled in a public secondary school."[15] The survey asks whether the institution arranges for remedial education using another funding source (survey question #14). The phrasing of this question is vague and should be clarified. (Dual Enrollment, page 12-13)	The Department appreciates these comments and has revised question #14. While we would prefer to address more rigorously, the Department's scope limits our ability to address further. **Edited Dual Enrollment Question #14:** Are experimental Pell Grant recipients who do not meet academic readiness standards provided access to remediation opportunities? If yes, please describe.
15	Institutions and/or secondary schools participating in the experiment are required to provide numerous other support services. Either the college or the high	The Department appreciates this comment. A new question about support services has been added to the school survey.

	school is required to support students in completing the FAFSA. The Department should add a survey question asking which entity provides that assistance to students. (Dual Enrollment, page 12-13)	**New Dual Enrollment Question #21:** What support services are provided by your institution or the high school to the secondary students who complete a FAFSA in order to participate in the experiment?
16	… dual enrollment credit does not always count toward high school graduation requirements; in these cases, students earn elective credit for dual enrollment coursework. Such policies can make it difficult for students who have not completed graduation requirements ahead of schedule to reap the benefits of dual enrollment. To understand the extent of this issue, a question should be added to ascertain the portion of dual enrollment credits earned that counted toward students' secondary graduation requirements. Such information may also provide valuable insight into how alignment between secondary and postsecondary partners can be strengthened. (Dual Enrollment, page 14)	The Department will make no change to the data collection based on this comment. While this is an important consideration, schools participating in the Dual Enrollment experiment would face substantial burden to collect/report this information and it is unclear that they would be able to consistently obtain accurate information from secondary schools.
17	The final question regarding STEM and/or workforce alignment (question 20) has the potential to solicit useful information about the extent to which dual enrollment programs are serving as pathways to valuable career opportunities in STEM and other in-demand fields. However, it is phrased in a vague manner and may inadvertently collect information about auxiliary or supplemental programs, rather than information about the coursework provided through the experiment. The question should be rephrased to request more specific information about the dual enrollment coursework funded through the experiment and its alignment to specific programs or student/career pathways, work-based learning opportunities, or other workforce training and credentialing programs. (Dual Enrollment, page 14)	The Department will revise question 20 based on this comment. **Edited Dual Enrollment Question #20:** Describe if and how high school student receipt of experimental Pell Grant funding is aligned with any STEM and/or workforce alignment programs.
18	The Department has already sought to cancel this experiment before restoring it following complaints from participating colleges. The Administration must finally take this evaluation seriously and construct and answer credible research questions. Specifically, we	Thank you for this comment. The Department will consider whether this is an appropriate time to end the Reduced Unsubsidized Loan experiment. No changes have been made to the data collection based

	recommend—as we did in *Off Limits*—that the Department begin anew and implement the experiment as a randomized controlled trial, with strict circumstances around which institutions are permitted to limit loans. Absent a serious evaluation plan and research design, the Department should again end the experiment. (Limiting Unsubsidized Direct Loans, page 14)	on this comment.
19	Better data are needed to answer these questions and identify any concerning problems. Specifically, the Department should add questions about changes to students' credit card debt (private loan debt is already recorded as non-Title IV loans, in survey question #19); budget constraints, including instances of food insecurity and difficulty paying rent; and reasons for failing to enroll in or return to higher education. (Limiting Unsubsidized Direct Loans, page 15)	The Department will make no change to the data collection based on this comment. While this is an important consideration, collecting such data is beyond the scope of the department's evaluation and it is unclear that schools would be able to consistently obtain this information in a manner that would permit rigorous evaluation.
20	The Department should request baseline data regarding the percentage spent by each institution prior to the experiment on wages for private-sector employers, as well as the percentage for each year in which the institution participates in the experiment. (Federal Work Study, page 16)	The Department will make no change to the data collection based on this comment. Student work for private-sector employers (some of whom are external to the FWS program) would pose a significant burden of postsecondary school informants. Additionally, it is not clear that schools would have maintained this information outside of participation in the experiment, especially if the employer relationship was not part of the school's FWS program.
21	Call to add a measure of the satisfaction of students participating (Federal Work Study, page 17)	The Department will make no change to the data collection based on this comment. We will consider the possibility of conducting student satisfaction surveys in the future, but do not believe such a survey could currently be conducted by schools in a manner that would yield information that could be rigorously evaluated.
22	The survey should also ask whether, for students who engaged in off campus work, the FWS opportunity presented any additional challenges for them, including	The Department appreciates this comment and has added a new question about challenges to the school survey.

	related to transportation costs; whether they believed they earned a fair wage for participating in the program; and whether they believed the number of hours they worked conflicted with their studies. (Federal Work Study, page 17)	**New FWS Question #27:** What challenges do students receiving experimental FWS funds face in fulfilling the responsibilities of both their experimental FWS positions and the demands of their educational program.