

Getting Ready for FAFSA Administration

Steps for Working With Financial Aid and Corrections

AT A GLANCE

Leveraging the return of Pell Grants to create additional opportunities for students in correctional facilities as federally approved Prison Education Programs (PEPs) require close collaboration between the college's prison program office staff, the correctional agency, and the college's financial aid department. This resource details some of the initial steps in establishing these critical partnerships and getting ready to administer the FAFSA for incarcerated students as a PEP. Keep in mind that the details may vary depending on state and local context.

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Disclaimer: This overview is specific to new Prison Education Programs (PEPs) for Award Year 2023-24 and should be used for operational planning for PEPs for this award year only. Second Chance Pell (SCP) sites should follow the alternative guidance specific to the Revised Experiment for 2023-24. There will be different documents and processes for Award Year 2024-25 following the implementation of the simplified FAFSA. More information will be provided prior to the start of that award year.

Step 1

Establish a productive working relationship between the program office and the oversight entity (e.g., a correctional agency) as well as between the program office and the financial aid office. This is a critical foundation for all the other steps. Take the time to get to know each other's work, responsibilities, and areas of expertise.

Step 2

Determine the PEP application parameters of the oversight entity (e.g., correctional agency) as well as the correctional agency regulations that will impact how you conduct financial aid applications. The following questions can help guide planning conversations with leadership/staff at the correctional agency or the facility where programming will be offered.

1. What are the eligibility criteria imposed by the oversight entity that impact which students you will have access to?
2. Will your students complete the online or the paper FAFSA?
 - a. To fully participate in the online FAFSA application process, students will need internet access to the Federal Student Aid (FSA) website, and will need to establish an email address. Is the correctional agency open to allow-listing the FAFSA site to permit efficient, online completion?
 - i. If allow-listing the FAFSA is possible, how will the agency wish to facilitate this process? Will access be permitted on a once-a-year basis strictly for this purpose, or is access broader in scope?
 - ii. What time and space will be available for program staff or financial aid counselors to help students with online FAFSA completion? Will you work with students individually or in small groups?
 - iii. Students need email and internet access to receive the Student Aid Report electronically, as there are links in the report that students need to click on in order to receive their aid information.

- iv. If students are only permitted to use the internet for the initial FAFSA entry, is the program prepared to compose aid reports at their institution in concert with the financial aid office and provide paper results to students?
- b. If no form of internet access is allowed, and you will need to use paper applications only:
 - i. How will you get the paper FAFSA in and out of the facility? What is the process for bringing documents in and out of the facility?
 - ii. What time and space will be available for program staff and/or financial aid counselors to support students with paper FAFSA completion? Will they work with students individually or in small groups, and how much time will need to be allocated for those meetings?
 - iii. How will the Student Aid Report data reach students?
- 3. Can the correctional agency help students access any needed records or data?
 - a. For example, will the correctional agency be able to help with obtaining information such as Social Security number or Alien Registration Number or proof of high school equivalency completion?

Step 3

Confirm all official required paperwork. There are a number of application documents to submit before you can administer financial aid. Talk with your financial aid office about how you will collaborate on these required documents. It may be helpful to construct a projected timeline for the processes below; some can take weeks or months to complete, depending on the approvals required.

1. Oversight Entity Approval of PEP: In each state, the oversight entity (e.g., correctional agency) will determine the process for PEP approval. Look into whether the process has been finalized and/or whether there are opportunities to provide input.
2. Accreditation: Each accrediting body is setting up its own process to allow additional locations to be established for PEPs. Talk with your liaison officer about the requirements of your accreditor. Keep in mind that the process of accreditor approval can take substantial time, so you will want to consult with your liaison officer about what this timeline might look like.
3. PEP Application to the U.S. Department of Education: The financial aid office will be responsible for submitting an application to the U.S. Department of Education through the E-APP to become an eligible PEP. In order to complete this process, they will need to be

prepared to attach the official PEP application document, the oversight entity approval, and the accreditor approval.

Step 4

Understand how different college policies related to financial aid might impact students who are currently incarcerated. Specific policies to consider include:

1. Is the specific program(s) to be offered Pell eligible?
2. Is there an offline college application and course enrollment process?
3. Is there alternate funding to support the enrollment of students who are not Pell eligible?
4. What is the policy for handling any gaps between the total Pell Grant and the total cost of attendance?
5. What is the minimum enrollment required to run a course? Is it the same as on-campus courses?
6. What is the withdrawal policy? How might it need to change for incarcerated students, who have less agency than other students? Is there a leave of absence policy in case a student's access to the classroom is disrupted?
7. What are the policies surrounding transition from the prison to the main campus, such as enrollment or housing barriers for people with convictions?

Step 5

Consider how Cost of Attendance (COA) will need to be defined for the PEP. COA impacts the amount of Pell funds a student can receive. Federal guidance indicates that:

- Schools may have different tuition rates for students in different programs, but schools may *not* charge confined or incarcerated individuals a different tuition rate than non-confined or incarcerated individuals who are enrolled in the same program. Familiarize yourself with the policies of your institution for how tuition and fees are established.
- COA for PEPs may include tuition and fees, books, course materials, supplies, equipment, and costs associated with obtaining licensing or credentials.
- All other components do *not* apply for PEP students. Schools must ensure room, board, travel, parking, etc., are *not* included.

Talk with the financial aid office about the best way to structure COA for your PEP in accordance with your institution's guidelines. Things to consider:

- Do you need to charge additional fees to cover the cost of books, technology, or the printing of online materials?
- If you are operating a STEM program, are there lab fees that should be included?

You may also want to consider additional costs associated with the PEP program when developing your program financial model. For example:

- Are faculty and program staff reimbursed for travel expenses to and from facilities?
- Are faculty compensated for time spent in security processing at facilities?
- Does teaching in the PEP count toward faculty teaching loads, or will you be hiring adjunct faculty?
- What is the compensation model for other student support services staff (tutors, advisors, etc.)?
- What is the anticipated credit load for students? This can impact the total Pell award. Consider how the number of credits offered will impact the amount of aid students are eligible for during the semester and overall.

Step 6

Determine an initial plan for data collection on student outcomes. How will you track progress of PEP students, including after they transition from the PEP to main campus programs?

1. What needs to happen within the college's student information system to indicate which students are or were enrolled in a PEP?
2. What role will the financial aid office play in tracking outcomes for the PEP? What information will the financial aid office need to collect from other entities to fulfill their Title IV reporting duties?
3. The oversight entities are required to share student transfer and release date data with colleges. How will you collect, store, and utilize this information. (i.e., Return to Title IV [R2T4s] when applicable)?

Other Considerations

- What are the relevant state aid deadlines, and how does this impact planning?
- Is there transparency for students about how Pell Grant funds are administered? For example, what their Pell Grant covers, what is included in billing statements, and why they will not be receiving refunds or credit balances?

- How can the enrollment management and financial aid process be streamlined? Can it be integrated into general college application and enrollment processes?
- How will you meet financial aid consumer information requirements?
- What process will you put in place to repackage financial aid and remove incarcerated student flags for students who are released from prison and re-enroll on campus?