### BO1. Understanding Prisoner Education Programs and Federal Pell Grants for Incarcerated Students (Q&A)

**Question:**

Is there a way to get a copy of this Q & A?

**Response:**

SME Cagle. The Q&A will be available for viewing once the recorded session is posted.

**Question:**

Presenter mentioned a school offering an prison education program at a facility does not need to apply for approval to to offer a second or subsequent program at the same facility. Does the second or subsequent PEP need to be at same or lower credential level as the existing approved PEP.

**Response:**

SME Cagle. There is no requirement for the second or subsequent PEP to be at the same or lower credential level as the existing approved PEP.

**Question:**

Concerning the Identity verification for incarcerated individuals. Normally a form needs to be notarized if not explicitly witnessed by an FAA. Will it be acceptable for the Oversite Entity to witness this on the form?

**Response:**

SME Cagle. The Department suspended the in-person submission and notary requirements for V4 and V5 verification during the COVID-19 national emergency.

**Response:**

What is the guidance outside of the national emergency? This will be an issue and potential hardship for both FAAs and students.

**Response:**

SME Cagle. The Department will provide additional guidance on this topic once the national emergency is lifted. Stay tuned.

**Question:**

Will the Fresh start initative be eligible for incarcerated students?

**Response:**

Yes, Fresh Start Initiative is eligible for incarcerated students - SME Shuler

**Question:**

It sounds as if the COA must include direct costs only - tuition, fees, books, supplies. Is it accurate that the COA should match the student charges exactly to leave no room for any sort of credit? We have an incarcerated student who receives tribal funds. The tribal funds he receives currently exceed his cost and he has been receiving a credit. Once the program is approved as a PEP, his Pell would likely cover his costs and we would return the tribal funds. He will no longer receive any sort of credit once the program is a PEP, is that accurate?

**Question:**

-FAFSA - would the paper forms be able to be submitted electronically by FA Office, or must paper form be mailed? -If your accrediting agency has visited current programs, do accreditors need to review again for PEP TIV designation? -Also, will there be more guidelines on creating COA for PEPs?

**Response:**

SME Washington - Yes, for 2023-24. Yes, the accrediting agency must visit the correctional facility within 1 year after the PEP has been approved even if the accrediting agency has already visited.

**Question:**

My understanding is that V4 and V5 verification must still be completed for PEP students. How do we do this? What are acceptable forms of documentation of identity since we can assume that the incarcerated students will not have access to their state or federal IDs.

**Response:**

SME Washington - For the 2023-24 award year, a confined or incarcerated student as indicated through the new incarcerated applicant flag will only be required to verify their identity and statement of educational purpose. This means incarcerated students selected for Verification Tracking Group V4 and V5 will only be required to verify their identity and submit a statement of educational purpose. In addition, institutions are not required to verify a confined or incarcerated student selected under Verification Tracking Flag “V1.”If the individual is provided an ID from the correctional facility that is acceptable. Also, the postsecondary institution and the oversight entity can work together to get the necessary documentation to complete verification.

**Question:**

Currently under SCP, if a student or sponsor submitted the FAFSA to an institution but then is transferred to a different facility that a different school offers programs, we can collect a DRN form, send it to Ashley Shuler to be processed. Will this still be the case for PEP?

**Response:**

There will be more forthcoming guidance on the DRN/Federal School Code process - SME Shuler

**Question:**

slide 29. If the Fin Aid office enters the FAFSAs directly, can we use the standard FAFSA and just "click" the incarcerated flag that will be in the system? When will the flag be available?

**Response:**

SME Washington - Yes, and the flag is already available.

**Question:**

Under the SCP program one of the waivers included that the cost of attendance offered at a correctional facility can be different than the cost of attendance of the same program on your campus, will this still be allowed with PEP?

**Response:**

SME Cagle. Postsecondary institutions may have different charges for students in different programs, but they may not charge incarcerated students a different amount than non-incarcerated students who are enrolled in the same program. However, an institution may determine that its PEP program is a different program than the program it offers traditional students, even if the credits and courses are the same.

**Question:**

The incarcerated student FAFSA is available at this website now: https://fsapartners.ed.gov/knowledge-center/topics/prison-education-programs

**Question:**

Are there any waivers for verification for PEP?

**Response:**

SME Washington - For the 2023-24 award year, a confined or incarcerated student as indicated through the new incarcerated applicant flag will only be required to verify their identity and statement of educational purpose. This means incarcerated students selected for Verification Tracking Group V4 and V5 will only be required to verify their identity and submit a statement of educational purpose. In addition, institutions are not required to verify a confined or incarcerated student selected under Verification Tracking Flag “V1.”

**Question:**

Is the incarcerated student flag located on the 23-24 FAFSA only? Can it only be flagged on CPS?

**Response:**

An FAO can manually set an incarcerated student flag on behalf of a student - SME Shuler

**Question:**

At the beginning of the presentation, he mentioned that we cannot simply offer an already created program in a prison location and it qualify as a PEP. If we follow the PEP guidelines, can an already offered program be adapted to be approved? For example, we are currently offering a Bachelor's Degree that is available to our regular students in a local prison. Can this program be considered a PEP to offer Pell if we follow all the outlined details in this presentation? Or is he saying it must be a completely different program to be eligible?

**Response:**

SME Cagle. An institution may work with a Correctional Facility to have an existing program approved through the PEP provisions. The program does not need to be a different program to apply.

**Question:**

Please provide the information on a PEP application or where we can get the requirements to apply. Also, does the post-secondary instituition have to have a representative at a location if it is providing correspondence/distance learning delivery of courses?

**Response:**

SME Washington - No, there is no requirement in regulation that the institution have a representative at the correctional facility if the PEP is offered through distance or correspondence. However, accrediting agency may have various standards.

**Question:**

If we want to be eligible to offer Pell for our PEP in Fall of 2023 and we were not already a part of the Second Chance Pell experiment, is there guidance on where and when we should submit the application requirements outline on the requirements slide to have our PEP approved for Pell?

**Response:**

SME Cagle. Schools will be able to submit their PEP application using the E-App. More information about the application process will be provided in the Spring.

**Question:**

Can an institution offer a PEP at more than 2 additional locations? Thank you. Great presentation and information.

**Response:**

Yes, an institution can offer PEP at more than two additional locations. - SME Shuler

**Question:**

Will there be a transition period for Second Chance Pell institutions? Or will Second Chance Pell end on July 1, 2023 and those institutions must go through the process to convert to PEP?

**Response:**

SME Washington - Yes, there will be a transition period for Second Chance Pell institutions. The Experiment will not end on July 1, 2023. The Department is currently working on guidance in regards to the Second Chance Pell initiative.

**Question:**

What steps, if any, must a financial aid office take on a student identified as incarcerated (per their address on the FAFSA), but the address is clearly not of a prison, but is rather the address of their single family home?

**Response:**

SME Cagle. There is no requirement for the address to be a Correctional Facility. However, if the student is not identified as incarcerated, the FAO must manually set the incarcerated student flag in FAA Access to CPS online.

**Question:**

WIll the PEP need to meet the 15 weeks and 600 contact hrs or 16 credit requirement?

**Response:**

Yes, per 34 CFR 668.8, that is the minimum program length for Pell Grants - SME Shuler

**Question:**

Should the prison site be added as an additional location on our E-App/ECAR for approval?

**Response:**

SME Washington - Yes, the correctional facility in which the PEP is offered must be reported to the Department through the E APP

**Response:**

Does it matter if less than 50% of the program is offered at the correctional facility?

**Response:**

SME Washington - the requirement for additional location reporting has not changed. The definition still states: A facility that is geographically apart from the main campus of the institution and at which the institution offers at least 50 percent of a program