

## **“Pell Doesn’t Cover the Whole Thing”: Administrators on the Costs of Providing Prison Higher Education**

Launched in 2015, the Second Chance Pell Experiment allowed a select number of institutions of higher education to provide Pell Grants to eligible incarcerated students. Seven years later, and on the cusp of Pell expansion, colleges and universities are expressing increased interest in entering the field of higher education in prison, often with the mindset that Pell will be sufficient to cover costs associated with adequately serving incarcerated students. However, data gathered from administrators at select existing Second Chance Pell sites suggests otherwise.

This research brief draws upon three years of data collection through a national mixed-methods project, *Exploring the Experiences of Participants in Second Chance Pell*.<sup>1</sup> Here we draw from the perspectives of higher education administrators and practitioners participating in the federal Experiment. Specifically, we focus on their perceptions and experiences as to whether the Pell Grant adequately covers the costs of providing high-quality postsecondary education in prison. Unquestionably, administrators and practitioners report that the Pell Grant alone is insufficient. In particular, they remark that various costs associated with the program cannot be covered by Pell, including one of their greatest needs: staff necessary to support existing and prospective students. Consequently, personnel in this sample often take on responsibilities with the prison higher education program that fall outside of their contracted duties with the college or university.

### **THE COST OF ATTENDANCE: ABSORBING STUDENT COSTS IN PELL-DEPENDENT PROGRAMS**

Administrators and higher education in prison program practitioners indicate that the Pell Grant does not cover the full costs of student attendance, even at 2-year institutions. Despite widespread assumptions that Pell is a tenable funding source for community college programs,<sup>2</sup> administrators and practitioners at two-year institutions in our sample indicated that there remain significant financial gaps between program costs and students’ Pell awards.

Under Second Chance Pell guidelines, colleges and universities must calculate the cost of attendance (COA) based only on tuition, fees, books, and supplies. However, for non-incarcerated students, expenses like room and board, transportation, and dependent childcare can factor into the COA. In turn, the COA for incarcerated students determines how much Pell monies institutions of higher education can receive on their behalf. A financial aid representative at Site D (2-year, public) explained that the limitation on the cost of attendance “really lowers the amount of Pell grant they [students] can get.”

However, while colleges and universities are not allowed to charge incarcerated students a different amount than non-incarcerated students in the same program, they may “determine that [a] Second Chance Pell program is a different program than the program it offers traditional students, even if the credits and courses are the same.”<sup>3</sup> Thus, schools are technically allowed to charge a different tuition rate to incarcerated students.<sup>4</sup> Most institutions in our sample, though, adjusted fees for incarcerated students instead of revising tuition rates. Sites H and I (2-year, publics) charge incarcerated students the

same fees as non-incarcerated students: a \$5 per-credit fee and a \$50 per-course, respectively. Other institutions calculate fees differently for incarcerated and non-incarcerated students. At Site C (2-year, public), for example, incarcerated students pay “a small amount per credit” that is different than what their non-incarcerated counterparts owe. A financial aid administrator from Site B (4-year, public) explained that students in prison “do not get charged any mandatory campus fee” because “they are not using the campus services” but that institutions can still “raise the cost of attendance higher so it allows them to drop down more Pell.” A financial aid administrator from Site G (2-year, public) suggested incarcerated students pay different fees there, too, partly because instructors must travel to the prison. As a financial aid administrator at Site C (2-year, public) put it, “it’s how those other fees are attached or reduced that make the difference.” In other words, the school charges the same tuition rate but different fees for incarcerated students than non-incarcerated students.

Some administrators suggest that their goal is to draw down enough Pell to cover as much of the cost of programming as possible without relying on other funding sources. As an administrator at Site A (2-year, public) said, “Nobody ever wants to talk dollars and cents, but if a college doesn’t make money off of a student, you’re not gonna be in existence for very long.” In other words, schools have an incentive to recruit students who can draw down Pell and avoid enrolling students who cannot contribute financial aid. Site B’s (4-year, public) director alluded to this kind of thinking in discussing a concern she has about the expansion of Pell for incarcerated people. She fears colleges and universities will seek to establish programs as a revenue stream for their institutions. She opposes this mentality, insisting that, “We’re not making money off of it, and if you’re doing it right, you won’t either.”

**“WE’RE NOT MAKING MONEY OFF OF IT,” SHE DECLARED, “AND IF YOU’RE DOING IT RIGHT, YOU WON’T EITHER.”**

Nevertheless, even sites that aspire to screen students for Pell eligibility must use other funds to “absorb,” “cover,” and “scholarship” the tuition and COA of some students. Because their financial aid administrators were initially reluctant to navigate Second Chance Pell guidelines, Site H (2-year, public) has not yet developed the kind of streamlined screening process that would ensure only Pell-eligible students are admitted. The program relies on a state corrections grant, a community college foundation, and private donors to cover tuition and fees for students who are ineligible for Pell and otherwise meet admission requirements. The college administrator responsible for prison programming at Site I (2-year, public) attempts to pre-screen applicants for Pell eligibility. He uses financial aid databases to screen students for barriers like defaulted loans before they are permitted to apply to the prison higher education program. However, he noted that this method “doesn’t get everybody,” and he estimates that approximately 30 percent of applicants to Site I’s program are ultimately ineligible for Pell.

It is unclear if and to what extent students might be responsible for payment in such situations where they either are or become ineligible for Pell after admission. A financial aid representative at Site C (2-year, public) recalled that in the first semesters of the Second Chance Pell Experiment, some students ended up with tuition bills. The prison’s educational staff signed up people for classes before receiving their Pell eligibility status, leaving ineligible students with balances to be paid to the institution. Site C’s program director acknowledged that there are still students who begin courses only to realize that they cannot receive federal student aid. In such instances, the college’s foundation can use funds to “supplement” costs for these students but, “sometimes the Pell doesn’t cover the whole thing,” he concluded.

**“SOMETIMES THE PELL DOESN’T COVER THE WHOLE THING.”**

## THE “SIDE HUSTLE”: UNDERSTAFFING THE EXPERIMENT

Recent communications from the Department of Education indicate that colleges and universities have broad discretion as to how they can use Pell funds.<sup>5</sup> However, institutional administrators in our sample did not apply these funds to increase the one budget item that they need the most: staff. Above all else, administrators remarked on their institutions’ lack of staff to perform the uniquely labor-intensive nature of providing postsecondary programming and facilitation of federal student aid for incarcerated students. Tasks that students would normally be able to perform themselves fall upon administrators instead and are exacerbated by prison restrictions. For example, students do not have the kind of phone and internet access necessary, nor funds, to obtain their own postsecondary transcripts. Program staff at Site A (2-year, public) spend a significant amount of time locating these records on students’ behalf, then requesting them to be officially sent from the college or university. According to Site E (4-year, private) administrators, the additional task of establishing in-state residency can require considerable paperwork on behalf of staff. Administrators at Site D (2-year, public) shared that they often lose residency documents, resulting in unexpectedly higher tuition costs for students. Financial aid administrators from Sites G, H, and I (all 2-year, public) emphasized that completing FAFSAs on paper rather than online, as well as locating supporting documentation on behalf of students, is unnecessarily “time-consuming.” Financial aid administrators at Sites C and G (2-year, publics) cited the constant, “meticulous” monitoring that they must perform to properly maintain incarcerated students’ records. “I would like a little more support,” said a Site G administrator.

Administrators suggested that the lack of properly trained staff to manage and facilitate prison higher education programs is the primary cost that Pell does not cover. In fact, few programs in this sample can afford to hire the number of staff necessary to do the work. One administrator at Site I (2-year, public) wanted the Department of Education and his college to know that programming would improve significantly, “if we were able to build in some administrative costs and cover some staffing to defray some of the costs of operating the program.” He continued: “I would say our biggest challenge is we have to bring all the resources of the college inside, and we have to do that with few people.” Staff at Site E (4-year, public) suggest that more people power is necessary as well. “When I first joined,” said one staff member, “there were three full-time staff members doing the exact same amount of work that is being done now, which is absolutely insane to me.”

Staff affiliated with prison higher education programs in this sample serve incarcerated students as a “side hustle” in addition to their regular duties. “Second Chance Pell is nowhere in my job duties at all,” said an administrator at Site G (2-year, public). Another Site G administrator recalls thinking, “Holy crap, this is a lot of work,” when he first started assisting with the Second Chance Pell program. “I got a bunch of other stuff I do, too.” A reentry coordinator at Site H (2-year, public) said it would be a “dream...to have somebody who just does Second Chance Pell.” Staff members on-site at the prison often serve as a one-stop shop responsible for admissions, advising, financial aid, and other kinds of student support and guidance. Sometimes these staff are employees of the department of corrections, as is the case at Site C (2-year, public), with no formal affiliation with the college or university. This means that they routinely lack the specified knowledge and expertise of how financial aid, academic advising, and functions fit within the broader student services paradigm of the institution. In our sample, representatives of relevant departments rarely visited prisons, meaning that the staff with the most relevant expertise do not directly interact with incarcerated students or engage in the initial stages of admissions and financial aid processes for applicants. Their proxies do not always have

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the training and experience to follow correct policies and procedures in the context of a prison, resulting in costly administrative errors and misinformation communicated to incarcerated students.

A financial aid representative at Site B (4-year, public) encapsulated the staffing issue well. She said that programs like Second Chance Pell are “well-intended” but not fully considered from the “administrator standpoint” in terms of workflow and necessary resources. The prison higher education program she contributes to is small but requires considerable communication and coordination labor. “I think sometimes programs like this are unsustainable,” she says, “because it is time-consuming and we just lack resources, and so the program is not well run.” Sparse staffing leads to, “deficiency” and “compliance issues.”

## Discussion and Recommendations

To run well and provide students with optimal experiences, prison higher education programs need sufficient staff to navigate the complex barriers of carceral environments. There is a widespread perception that the Pell Grant will cover the necessary costs associated with prison higher education, but the administrators included in this study adamantly disagree. The hidden labor of facilitating federal student aid on behalf of incarcerated people is extraordinary and none of the programs in this sample had a designated person from financial aid or admissions who was paid to work with the prison program. Overall, prison higher education programs that facilitate federal student aid or seek to do so must invest resources for additional staff. Incarcerated applicants and students deserve access to knowledgeable staff who can answer questions and provide timely and accurate information.

To prepare for the expansion of Pell for eligible applicants, we provide the following recommendations:

- » Pell Grants are insufficient to cover the necessary costs of providing high-quality postsecondary education for all students, including those who are in prison. There is no reason to believe that Pell Grants can nor should provide all financing of prison higher education, unless what is being provided to incarcerated people is substandard.
- » Institutions of higher education must address policies and procedures that make enrolling incarcerated students unnecessarily costly. For example, investigating the extent to which colleges and universities have the power to develop and streamline processes for granting incarcerated students in-district and in-state tuition can significantly reduce costs for students in prison and unnecessary staff labor.
- » Where policy and procedure changes are not possible or effective, colleges and universities should pursue multiple funding streams beyond Pell to account for staffing needs. Additional monies to support Pell-ineligible students is critical so as not to exacerbate longstanding inequities in access and completion across higher education.
- » From the beginning of the Experiment, the Department of Education stipulated that Pell funds “are intended to supplement, not supplant, existing investments in postsecondary prison-based education programs.”<sup>6</sup> However, recent communications from the Department of Education suggest that this “supplement not supplant” requirement will no longer be in effect once Pell is fully reinstated. To encourage schools in the pursuit of multiple funding streams, the Department of Education should keep in place existing law and Second Chance Pell guidance that Pell Grants must “supplement not supplant” funding for prison higher education programs.<sup>7</sup> The Department has a responsibility to maintain parameters that discourage programs from becoming Pell-dependent and/or only serving Pell-eligible students.

## “BAD CREDIT LOADS”

Disconnects between federal aid and college policy have also led to unexpected costs. Currently, Pell awards are full-time (12 hours), three-quarter-time (9-11 hours), half-time (6-8 hours), or less than half-time (3-5 hours). Colleges, however, often charge a per-credit rate for tuition. A student enrolled in eight credit hours receives the same amount of Pell as a student enrolled in six hours but can owe hundreds more in tuition.

Administrators at sites A, C, D, G, and I, all 2-year institutions, highlighted these discrepancies. Sites A and C mandate that students enroll in the lowest range of each Pell tier (three, six, or nine hours). Yet degree requirements may force students to take classes that fall outside of that range (e.g., four-hour lab science courses). Colleges themselves sometimes “eat” these costs rather than passing them on to students. During its first year participating in Second Chance Pell, Site A, “wrote [almost \$70,000] to a scholarship fund” to cover the costs of “bad credit loads.” Administrators at Sites G and I indicate that their institutions “absorb” these costs as well, though the administrator at Site I stipulated that the college charged the program a fifteen percent indirect rate for processing these overages.

Administrators at Site A have since learned how to engineer students’ course schedules to fall within the

most “beneficial” credit ranges, especially in the early semesters of their program. Students will have to take those “odd” classes eventually, though. “We still have many situations where we’re writing off quite a bit of money for some students,” admitted an administrator at Site A.

Yet incarcerated students at Site A sometimes bear the cost. As he was nearing graduation, one student had four-credit hour math and biology requirements remaining and paid for those “extra” credit hours himself. Administrators at Site C readily admit that they charge students for hours that fall outside of the current minimum Pell increments. Dozens of incarcerated students described this as their primary out-of-pocket educational expense. This cost falling on students has “really hurt a lot of people,” as one Site C student put it.

Under the FSA amendments, financial aid awards for students enrolled less than full time will be calculated based on the number of credit hours for which they are enrolled rather than a tiered system of credit ranges. Nevertheless, “bad credit loads” exemplify how Pell-dependent programs now currently require more than Pell.

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## Endnotes

<sup>1</sup> For more, see: Castro, E. L., Royer, C., Aguilar Padilla, E., & Gaskill, S. (2022, October 1). *Exploring the Experiences of Participants in Second Chance Pell: Introduction and methodology*. Salt Lake City, UT: Research Collaborative on Higher Education in Prison.

<sup>2</sup> See, for example, Nadworny, E. & Migaki, L. (2022, June 23). *Getting a bachelor's degree in prison is rare*. That's about to change. NPR. <https://www.gpb.org/news/2022/06/23/getting-bachelors-degree-in-prison-rare-thats-about-change>

<sup>3</sup> Federal Student Aid. (2022, August 5). *U.S. Department of Education's Experimental Sites Initiative Second Chance Pell Experiment Frequently Asked Questions*. <https://experimentalsites.ed.gov/exp/pdf/SecondChancePellFAQ.pdf>

<sup>4</sup> *Ibid.* See Q and A 13.

<sup>5</sup> Dorsey, B. (2022, May 26). *Pell Reinstatement Eligibility for Incarcerated Students* [Webinar]. Federal Student Aid: Training and Information Services Group. <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2022-05-10/live-internet-webinar-pell-grant-eligibility-incarcerated-students>

<sup>6</sup> Department of Education, Notice Inviting Postsecondary Educational Institutions to Participate in Experiments Under the Experimental Sites Initiative; Federal Student Financial Assistance Programs Under Title IV of the Higher Education Act of 1965, as Amended, Federal Register Volume 80, Number 148 (Monday, August 3, 2015). <https://www.govinfo.gov/content/pkg/FR-2015-08-03/html/2015-18994.htm>

<sup>7</sup> Dorsey, 2022.