



November 2020

---

# First Class: Starting a Postsecondary Education Program in Prison

---

*Brian Walsh and Ruth Delaney*

# Contents

<b>2</b>	<b>Introduction</b>
<b>5</b>	<b>Unit 1: Guiding principles for postsecondary education programs in prison</b>
<b>8</b>	<b>Unit 2: Forming an implementation team</b>
<b>12</b>	<b>Unit 3: Setting up a satellite campus and designing the program</b>
<b>18</b>	<b>Unit 4: Establishing a partnership using a memorandum of understanding</b>
<b>22</b>	<b>Unit 5: Determining program funding, financial aid, and budgets</b>
<b>24</b>	<b>Unit 6: Creating academic and operational calendars</b>
<b>25</b>	<b>Unit 7: Recruiting and training college personnel</b>
<b>26</b>	<b>Unit 8: Recruiting, enrolling, and registering students</b>
<b>28</b>	<b>Unit 9: Creating a learning environment</b>
<b>30</b>	<b>Unit 10: Planning for emergencies</b>
<b>33</b>	<b>Looking to the future</b>
<b>34</b>	<b>Appendix: Worksheets for building an in-prison postsecondary education program</b>
<b>46</b>	<b>Endnotes</b>

# Introduction

---

Starting a college program in prison is a significant undertaking that will profoundly affect the lives of students, faculty, and staff. Although aspects of setting up a new college-in-prison program will be familiar to any college administrator who has built a satellite campus, the prison environment presents administrators with norms and rules for operating wholly unlike those of a typical college. They must tailor activities such as setting up classrooms, purchasing textbooks, scheduling classes, or implementing technology to address concerns about security and safety, physical access to students, remote locations of prisons, facility movements, student transfers, and disruptions to class. For these reasons, the process of starting a college program in prison will challenge and can reward all participants.

To build these programs, colleges and corrections agencies confront and troubleshoot many of the same challenges—for example, finding adequate classroom space, securing technology, or recruiting faculty in rural areas. Many of these challenges may seem different initially given the individual characteristics of the colleges and universities involved as well as the

## About Vera and college in prison

The Vera Institute of Justice (Vera) launched the Unlocking Potential: Pathways from Prison to Postsecondary Education (Pathways) project in 2012.<sup>a</sup> Over four years, Vera gave its partners in this three-state initiative technical assistance with planning and implementation, quality improvement and innovation, and cross-site peer learning and networking activities. Vera also provided funding and research support. Fourteen prisons partnered with 15 colleges that enrolled more than 1,200 students. Building on the lessons of Pathways, Vera, with the support of the U.S. Department of Justice (DOJ), Bureau of Justice Assistance, began in 2014 to share lessons

learned with colleges and corrections agencies across the country. Vera also convened listening sessions that brought together leaders in postsecondary and adult education, communities negatively affected by the justice system, corrections, the U.S. Department of Education (ED), and the DOJ to develop recommendations for expanding access to high-quality education for incarcerated people. When ED launched the Second Chance Pell Experimental Sites Initiative (SCP) in 2016, the department selected Vera to provide technical assistance to the selected SCP sites.

---

<sup>a</sup> Ruth Delaney, Fred Patrick, and Alex Boldin, *Unlocking Potential: Pathways from Prison to Postsecondary Education* (New York: Vera Institute of Justice, 2019), <https://www.vera.org/publications/unlocking-potential-prison-to-postsecondary-education>

differences between and within prison contexts. Vera has found, however, that most colleges and corrections systems take a similar set of preparatory steps to start a postsecondary education program in prison. The goal of this guide is to help program coordinators understand and accomplish the sequential actions necessary to launch a college-in-prison program, from the decision to undertake this work to the first day of class.

Colleges developing SCP programs have reported that planning for implementation can take anywhere from six to 18 months, depending on the academic program and the corrections context. It can often seem that progress is very slow. Because postsecondary education in prison combines two very different worlds, bureaucracies, sets of policies, and practices, colleges and corrections agencies new to this field will find that melding these two systems takes time, patience, creativity, and tenacity. As one college reviewer of this guide said, “Make sure readers understand this is a different world, and things can backfire if they go too fast.” Building a new prison program requires a team of people who are dedicated to implementation and recognize that it will take time to establish a high-quality program.

This guide contains 10 units:

1. Guiding principles for postsecondary education programs in prison
2. Forming an implementation team

### **Coordinating a statewide system of postsecondary education in prison**

Although this guide is primarily about how to start a postsecondary program at one facility, the guidance it contains can also help to create a system of higher education in prison. Incarcerated people are frequently moving among prison facilities and changing custody levels. With sufficient institutional will, colleges and corrections agencies can develop programs that meet the needs of students despite their shifting circumstances. In a coordinated system of postsecondary education in prison:

- Students are able to choose from and participate in seamless education pathways in academic studies, vocational training, and apprenticeship that lead to degrees and certifi-

icates that are industry-relevant and high-quality.

- Programs are dependable, predictable, and consistent in quality across facilities and custody levels.
- The curriculum is connected to work and further education in the community.
- The colleges and corrections agencies embed instructional technology that is equivalent to what is available on campus.
- The programs value equity, inclusion, and student voice in design and implementation.
- Students receive wraparound support services, financial aid, and academic counseling.

3. Setting up a satellite campus and designing the program
4. Establishing a partnership using a memorandum of understanding
5. Determining funding, financial aid, and budgets
6. Recruiting and training college personnel
7. Creating an academic calendar
8. Recruiting, enrolling, and registering students
9. Creating a learning environment
10. Planning for emergencies

Vera has provided a set of task checklists in the Appendix (page 34) that colleges and corrections agencies can use to guide their planning and program launch. The checklists cover many general tasks that the implementation team should discuss and assign to the appropriate partner.

### About the guide

In writing this guide, Vera drew on its experience providing technical assistance to more than 130 colleges working in partnership with 42 corrections agencies over eight years, as well as from interviews and conversations with college administrators, faculty, and corrections officials. Because Vera's researchers reviewed the literature on postsecondary education programs and found no resources on how to start one in prison, they relied on perspectives from the field. They shared each section with a select group of college and corrections leaders across the country to confirm its accuracy and seek additional input. Reviewers recommended changes, additions, and examples as well as resources. Vera would like to thank the following reviewers for sharing their insights and expertise:

- Sara Bouse, director, Texas Department of Criminal Justice Programs, Alvin Community College, Texas
  - Diane Good-Collins, reentry program director, Metropolitan Community College, Nebraska
  - Kristina Hartman, superintendent, Windham School District, Texas
  - Benjamin Jones, education director, Wisconsin Department of Corrections, Wisconsin
  - Molly Lasagna, executive director, Tennessee Higher Education Initiative, Tennessee
  - Todd Marshall, executive vice president, Ashland University, Ohio
  - Loretta Taylor, education services administrator, Washington State Department of Corrections, Washington
  - Donna Zuniga, dean, Huntsville Center, Lee College, Texas
- Chris Agans, director, NJ-STEP, Rutgers University, New Jersey

# Unit 1: Guiding principles for postsecondary education in prison

---

Colleges and corrections systems have distinct missions, visions, and values. College-in-prison programs potentially can support each type of institution in fulfilling its obligations and reaching its goals. Studies show that these programs provide numerous benefits to the people who enroll, as well as to the correctional and educational institutions that administer them, in such areas as:

- › **Preparing for post-release jobs and successful reentry.** Seventy percent of all jobs in 2027 will require postsecondary education and training beyond high school.<sup>1</sup> However, only 11 percent of incarcerated people in state prisons and 24 percent in federal prisons have gotten this qualification.<sup>2</sup>
- › **Racial equity.** People of color are disproportionately incarcerated in prisons.<sup>3</sup> College is a primary avenue for upward mobility—especially among people of color.<sup>4</sup> Those who enroll in postsecondary programs during or after prison share their knowledge, skills, and connections—their social capital—with their children and families, multiplying the impact of a single college degree.<sup>5</sup>
- › **Public safety.** Incarcerated people who participate in postsecondary education programs are 48 percent less likely to recidivate than those who do not. The odds of recidivism decrease as incarcerated people achieve higher levels of education.<sup>6</sup> Fewer crimes mean fewer victims.
- › **Facility safety.** Prisons with postsecondary education programs have fewer violent incidents than those without them, creating safer working conditions for staff and safer living environments for incarcerated people.<sup>7</sup>

- › **Taxpayer savings.** Every dollar invested in prison-based education yields \$4 to \$5 in taxpayer savings from reduced incarceration costs.<sup>8</sup> For example, Vera estimates that Kentucky could save more than \$1.9 million annually in incarceration costs if just one-quarter of Pell-eligible incarcerated students in that state participated in postsecondary education.<sup>9</sup>

Aligning these benefits with each institution's goals is important to ensure that all partners see implementing a high-quality postsecondary education program in prison as a means to fulfilling their missions. For example, colleges can connect programs in prison with goals to improve racial and economic equity in the community, while corrections agencies can connect postsecondary programs to their goals for creating more successful reentry outcomes for people returning to their communities. Partners setting up a postsecondary education program should meet to discuss the ways in which the prison program supports or advances their respective goals. To ensure transparency in the process, the following principles should guide these discussions:<sup>10</sup>

- › **Guiding Principle 1:** Build programs whose educational quality is comparable to those on campus. Provide education in prison that is of the same caliber as that at community campuses and will facilitate success for students continuing their education when they return home.
- › **Guiding Principle 2:** Maintain communication and collaboration among partners. Commit to a communication structure that will foster partnerships among the college, corrections department, and students. Organize meetings that support open dialogue and create a culture in which clear, honest exchange can lead to continuous program improvement.
- › **Guiding Principle 3:** Make space for inclusion and student voice. Promote inclusive spaces. Opportunities for diverse leadership, including student voices, are vital to creating a community that empowers faculty and students while cultivating leadership and self-efficacy.

---

Colleges and corrections systems have distinct missions, visions, and values. College-in-prison programs potentially can support each type of institution in fulfilling its obligations and reaching its goals.

---

- › **Guiding Principle 4:** Ensure equitable access. Embed gender and racial equity as well as accessibility into the program design. Ensure programs have developmental education on-ramps to create equitable opportunities for students at the pre-college level to enroll and succeed.
- › **Guiding Principle 5:** Collect data and build college expertise. Begin collecting enrollment, demographic, and completion data from the start of the program to support data-driven implementation strategies and identify areas for improvement. Ensure program consistency by documenting policies and procedures specific to prison-based education. Build college expertise by supporting faculty and staff professional development, for example, by giving faculty opportunities to learn best practices for teaching in prison.

# Unit 2: Forming an implementation team

---

Working collaboratively, the college and the corrections agency should build an implementation team made up of representatives of all participating agencies. The goal in selecting team members is to ensure that subject matter experts and key college and prison decision makers are involved in program development. The implementation team will share the work needed to start a program, including such responsibilities as crafting and evaluating policies and practices, interviewing faculty and administrative staff, and creating classroom spaces.

One of the primary responsibilities of the implementation team is to establish communication channels between the main campus and the prison program as well as among the prison program, department of corrections (DOC) facility leadership, and DOC executive leadership. Program coordinators should share periodic progress updates with the college president and the DOC executive.

The key members of the implementation team may include:

- › **Program coordinator.** The program coordinator's role is to lead the implementation team, oversee program development, and manage it once established. Depending on the college, the program coordinator may be a dean, program director, or faculty member.
- › **College financial aid director or designee.** Because many postsecondary programs in prison rely on federal and state financial aid, it is crucial to include staff from the college financial aid office in design and implementation.
- › **College chief academic officer or designee.** Faculty union contracts, accreditation requirements, and state higher education board policies about which the chief academic officer is equipped to provide guidance may affect postsecondary programs. It is

---

Working collaboratively, the college and the corrections agency should build an implementation team made up of representatives of all participating agencies.

---

therefore vital to include the chief academic officer or designee on the implementation team if the program coordinator is not a senior academic administrator. Depending on the college, the chief academic officer may be a vice president of instruction or provost.

- › **DOC education director (headquarters-level) or designee.** The DOC's education director can help a program navigate potential barriers, connect the goals of the program to broader DOC education goals, and identify policies and procedures the program will need to follow. Some DOC education offices are large enough to have dedicated postsecondary education staff who can act as the liaison to the implementation team.
- › **DOC assistant warden or superintendent in charge of programming.** Although DOC facilities' staffing models vary, most have a senior leader at the local facility who supervises programming and education. A person in this role can address security, space, and program coordination.
- › **Other possible members.** Because each state, DOC, and college differs, in some instances it may be necessary to expand the team to include the college grants manager, business office personnel, DOC facility education director or principal, DOC plant manager, DOC or college IT director or staff, student services director or staff, or workforce development dean.

---

It is vital that the implementation team clarify the DOC's reporting structure so that all involved understand which decisions the local prison can make versus those that rest with the central corrections administration.

---

During the program's development, the implementation team should plan to hold regularly scheduled meetings—at least monthly. The team should set implementation milestones and monitor progress toward those goals. For example, it should set deadlines for preparing classroom space, presenting to prison staff about the program, and completing Free Application for Federal Student Aid (FAFSA) requirements. Over time, as the team meets its goals, it may find it needs to hold fewer meetings.

The implementation team includes decision makers who will benefit from the input and perspective of other subject-matter experts. While the team focuses on establishing the program, the program coordinator will also want to connect with other staff and stakeholders, including:

- › currently and formerly incarcerated people;
- › campus program staff serving veterans, underrepresented, nontraditional, and disadvantaged students;
- › human resources professionals;
- › disability support service providers;
- › community corrections (probation or parole) staff;
- › DOC public information office staff;
- › college institutional effectiveness and research offices;
- › career services staff;
- › office of student services staff; and
- › community industry partners and workforce program employers.

Finally, it is vital that the implementation team clarify the DOC's reporting structure so that all involved understand which decisions the local prison can make versus those that rest with the central corrections administration. Most DOCs operate under a quasi-military chain of command. Understanding when to elevate requests to higher levels within a DOC's command structure will build support for the program by demonstrating respect for the agency's policies and procedures. For example, prison plant maintenance directors often have the discretionary budgetary authority to meet normal operational needs. If a college-in-prison program requires upgrades to vocational classroom space, a college should first work with the plant maintenance director to find a solution before sending the request to the headquarters level.

### Creating a team across multiple agencies

In 2013, the North Carolina Department of Public Safety (DPS) collaborated with five community colleges to develop a college program that would prioritize offering transferable credit to incarcerated people. At the time, DPS only offered career-technical credentials in prison. The college and corrections partners worked to select programs from the available credential tracks that included the greatest number of transferable courses, such as those that would meet math and

English requirements for multiple credential tracks. This enabled DPS and the colleges to offer a flexible and transferable set of courses to incarcerated students that they could build on to continue their educations when they returned home. This system was developed by a team made up of the DPS director of rehabilitation programs and services, liaisons from each participating college, college counselors, faculty, local reentry council staff and navigators, and IT experts.<sup>a</sup>

---

<sup>a</sup> Delaney, Patrick, and Boldin, *Unlocking Potential*, 2019.

## Unit 3: Setting up a satellite campus and designing the program

---

The importance of comparable quality between campus offerings and those of college-in-prison programs extends beyond abstract notions of equity. Not only do accreditation standards require this equivalence; if students in prison are using some of their lifetime eligibility for Pell Grants and other federal or state financial aid to pay for courses, the program must be worth this expenditure of scarce resources. For these reasons, starting a postsecondary education program in a prison must use the same building blocks as any other kind of instructional location or satellite campus: faculty recruitment, classroom design, accreditation, and community support.

In setting up the new location, colleges may be required to gain approval of the site from the regional accreditor and state higher education coordinating board. Because accreditation standards vary by region and accreditor, it is vital to connect with the college's accreditation officer to ensure the prospective program meets its requirements. Depending on the length, scope, and type of program, accreditation requirements may differ. For example, programs leading to a college credential while in prison will have different accreditation and notification requirements than programs that only offer one or two semesters of credit. If using federal financial aid, the college financial aid director will be responsible for updating the program participation agreement (PPA) with the ED. Since these processes can often take months to complete, colleges should start this process as soon as possible after deciding to launch a new program.

The implementation team will need to determine the degrees or certificates the program will offer, the roster of courses required for completion, and the faculty and staff needed to run it. Because of the relatively small number of students who are likely to enroll in prison-based programs, colleges typically cannot offer their full catalog and must select a few credential tracks.

Colleges should plan to deliver programs that are transferrable to multiple degrees or provide courses that meet the academic requirements of a variety of different programs (such as STEM, humanities, and applied technical courses) to introduce students to possible future pathways. This will prepare them to continue their education after release. To accomplish these objectives, the team should engage faculty, campus program advisory committees, and incarcerated students.

---

**A new postsecondary education program in a prison must use the same building blocks as any other kind of instructional location or satellite campus: faculty recruitment, classroom design, accreditation, and community support.**

---

The range of vocational and workforce programs in prison may also be more limited than in other settings. Nevertheless, colleges have been successful in delivering a wide variety of career and technical education programs in prison despite the challenges of security and facility limitations. Colleges have offered degrees in advanced manufacturing, coding, business, automotive repair, and welding. Working with their DOC partners, colleges have built state-of-the-art vocational labs that ensure students have access to equipment equivalent to that on campus and are prepared for employment after release.

Faculty needs will depend on the program type (academic or career-technical) and size. The program coordinator will need to work with the college's chief academic officer to determine if prison faculty members will be full- or part-time and with individual academic departments to identify

appropriate instructors. The coordinator should consult with the college human resources and business offices to answer any questions about faculty reimbursement for travel and training and opportunities for, or limitations on, volunteer faculty.

---

**Colleges have been successful in delivering a wide variety of career and technical education programs in prison despite the challenges of security and facility limitations.**

---

The implementation team has to determine how to provide academic supports, such as new student orientations, library resources, tutoring, academic advising, and faculty office hours. Some programs are small enough that the coordinator or other administrative staff can serve as the adviser. Some programs with larger enrollments may want to partner with the college's student services department to ensure that there are enough academic advisers and counselors available to provide accurate and timely advising and counseling.

The implementation team should work with student services offices to design orientation sessions for incarcerated students that describe college culture and explain principles such as academic freedom, policies such as those governing class attendance, and practices such as appropriate interaction in class discussions. Several SCP colleges invite currently incarcerated people who have pursued their education in prison to be part of the orientation process.

Because prison facility space is often quite limited, the implementation team should work with DOC facility leaders to identify the number and

location of available classrooms. If it plans to share spaces with other in-prison programs such as adult basic education or cognitive behavioral therapy, the college should clarify the allowable use of space and materials. For example, colleges should determine if there are restrictions on rearranging furniture or using whiteboards, chalk, and markers and if college faculty can use existing overhead projectors or televisions.

A program's effective and efficient operation requires some level of administrative support within the college and the corrections agency, often from multiple offices within each institution. This administrative oversight will involve recruiting students, assisting them with financial aid paperwork, and enrolling them in their courses; ensuring that classrooms are set up and supplied with materials; adding courses to the prison scheduling system (often referred to as the "call-out") so that prison officials permit students to attend classes; and coordinating student attendance and space with other prison programs.

The implementation team should document program requirements, policies, and procedures so that they can share this information widely, improve transparency, and ensure consistency. Some colleges create full college catalogs (see Appendix, page 34) while others publish print and electronic program descriptions that advisers, corrections counselors, and students consult to understand requirements, program outcomes, course summaries, degree tracks, and likely employment opportunities. The college should have policies including, but not limited to, the following subjects:

- › program prerequisites and qualifications;
- › satisfactory academic progress;
- › withdrawal from the program;
- › student transfers and program holds that keep students from being transferred to other prisons until after they complete the course of study;
- › classroom expectations and student conduct;
- › grading policies for students whose course of study has been disrupted by a transfer to another facility or by a security-related issue;
- › academic code of conduct;
- › faculty code of conduct; and
- › use of technology.

---

Postsecondary education programs in prison help DOCs to adhere to institutional mandates and goals related to facility safety and reduced recidivism. Communicating this to all prison staff who may have a role in the program can help to build support for its success.

---

Finally, the implementation team will need to cultivate support for the postsecondary program among prison staff and begin engagement with potential students. Prison staff, who may already be overburdened by their responsibilities, may be frustrated by additional demands on their time that arise from the postsecondary program. To defuse these tensions, the implementation team should plan outreach activities, trainings, information sessions, and other strategies for engaging prison staff.

Postsecondary education programs in prison help DOCs to adhere to institutional mandates and goals related to facility safety and reduced recidivism. Communicating this to all prison staff who may have a role in the program can help to build support for its success. In addition, staff often have questions about college because they or someone in their family would like to enroll. The college should find ways to support these aspirations among staff. The program coordinator can work with the implementation team to identify specific roles and groups to engage, including:

- › correctional counselors;
- › shift security personnel such as lieutenants and shift sergeants;
- › correctional industries managers;
- › chaplain and activity directors; and
- › social and cultural groups in the prison population.

## Examples of postsecondary programs in prison

Colleges and their corrections partners have found multiple ways to deliver education within prison. The examples below illustrate the diverse structures.

- Begun in 2012, the Tennessee Higher Education Initiative (THEI) works in partnership with the Tennessee Department of Correction and community colleges across the state, the flagship program being with Nashville State Community College (NSCC). Through an MOU agreement, THEI provides on-site coordination and administration on behalf of NSCC, acting as a proxy agency. THEI program staff members proctor entrance exams, facilitate the application process, handle individualized academic advising for NSCC students in prison, and provide reentry services and planning for students' transition to campuses on release.
- Iowa Central Community College (ICCC) offers vocational programs in partnership with the Iowa Department of Corrections, including welding and carpentry, as well as an academic path to an associate of arts (AA) degree. Students have the option to count the credits earned in vocational certificates as electives toward their AA degree. Additionally, ICCC partners with the University of Iowa's Liberal Arts Behind Bars program to offer students the opportunity to earn a four-year degree.
- Langston University offers bachelor of arts (BA) degrees in business administration or rehabilitation services to students incarcerated by the Oklahoma Department of Corrections. Through a partnership with Tulsa Community College (TCC), Langston has been able to expand its program to include more students by reverse transferring those who require courses not currently offered by Langston. Reverse transfer of credit provides the opportunity for students who took classes at Langston University but who were transferred by DOC before completing their degree to a prison served by TCC to transfer the credits they earned at TCC back to Langston.
- The Moreau College Initiative (MCI), a joint venture between the University of Notre Dame and Holy Cross College (HCC), in partnership with the Indiana Department of Corrections (IDOC) at Westville Correctional Facility (WCF), offers students an AA degree with the option to transition to a BA degree program. Based on the Bard Prison Initiative model, both HCC and University of Notre Dame faculty members teach the courses. While pursuing their studies, incarcerated students live and learn together in a designated housing unit where they have the opportunity to study outside of class time. Graduate student volunteers from the two schools travel from campus to supervise study halls in the school space, supporting a robust schedule of liberal arts classes. The college at WCF includes a computer lab with intranet server, a literature lounge, and a nonfiction MCI library. Students have access to HCC and Notre Dame libraries through their status as HCC students. A team of student volunteers led by an AmeriCorps member assists in fulfilling students' library requests. With support from IDOC, HCC recently began to email with students outside of class, which is particularly important during lockdown or situations that cause limited facility access.
- University Beyond Bars (UBB) was started in 2003 by the Black Prisoners Caucus at the Washington State Reformatory in Monroe, Washington. The organization was born out of a desire to provide access to a quality liberal arts education inside prison walls, to bridge the gap in academic disparities between incarcerated and non-incarcerated people, and to provide educational and social justice to communities adversely affected by the criminal justice system. UBB offers three educational pathways: a degree pathway that offers transferable AA degrees in partnership with Seattle Central College and BA-level courses accredited through Adams State University; an enrichment pathway that provides not-for-credit courses, college prep classes, workshops, and seminars designed by UBB instructors and students; and an arts and lecture series that provides access to lectures, workshops, and performances to the entire prison population. Since its founding, UBB has evolved into a stakeholder-driven nonprofit organization that centers student voices in its work—incarcerated students and leaders continue to govern, evaluate, and operate the program in collaboration with staff, volunteers, and the UBB board of directors.

# Unit 4: Establishing a partnership using a memorandum of understanding

---

One of the first goals of the implementation team will be to establish a formal partnership between the DOC and the college. Creating a memorandum of understanding (MOU) will help both institutions develop shared goals and a mutual understanding of how to achieve them.<sup>11</sup> Instead of creating a new MOU, colleges that have existing contracts or interagency agreements with DOCs can review and update these documents to ensure they address the particular needs of a new

---

MOUs are not intended to be static documents. As program components change or new technology becomes available to students, the college-prison partnerships may want to revise their agreements.

---

postsecondary program. To support a robust partnership, both parties should participate in developing the MOU.

Although MOUs or contracts between DOCs and colleges will vary in length and style, there are some standard elements. These elements give structure to the college-prison partnership and can be a factor in

the success and longevity of a partnership, particularly as important staff changes inevitably occur. Moreover, the process of completing an MOU will put into action the agreements the implementation team will have developed about the structure and operations of the new program.

MOUs are not intended to be static documents. As program components change or new technology becomes available to students, the college-prison partnerships may want to revise their agreements. Sometimes, the partners will need to develop goals, responsibilities, and tasks using an iterative process over the life of the project. If this is the case, the MOU should establish a process and schedule for negotiating, memorializing, and committing to these not-yet-determined responsibilities. This makes it possible to adjust the work without having to re-execute the MOU.

---

## MOU elements

- **Background.** This section should summarize information about the parties (such as their full legal names) and the reason why they have chosen to enter into the agreement. It may also include background information about the project and whether it is part of a bigger initiative—such as referring to ED’s SCP Experimental Sites Initiative.
- **Goals.** While the background section describes the past and present, the goals set the tone for the future. Listing shared goals captures parties’ reasons for embarking on the project and can serve as a reminder or an anchoring point of focus as the project develops and as important staff change.
- **Implementation plan.** This is the core section that explains how the parties will achieve their goals. The implementation plan may give an overview of the project’s structure, such as expected start and end dates, as well as a description of the target population the program will serve, or it could be a very detailed mapping out of what, when, and how they will carry out different parts of the project. In either case, it should include dates or timelines by which they must complete activities, such as the necessary lead times for recruitment, FAFSA completion, enrollment, approval of course materials by the DOC, security clearances, or required trainings.
- **Responsibilities of the parties.** This section ensures that there is no confusion about the duties and roles of the parties during implementation. Drafting this section with specificity and detail will ensure each party has a clear understanding of its role in the project. Where roles in the project that are governed by the MOU intersect with other roles or responsibilities, such as specific corrections policies that cover education in prisons or requirements that specific staff at the college handle certain student data, the MOU should cite these connections. This section should serve as a checklist for both parties as they divide up the work to implement the program and be specific enough to consult when resolving problems that arise.
- **Term of the agreement.** This section states the start and estimated end date of the agreement. Implementation realities change as projects proceed. Revisiting an MOU on an agreed-to timeline ensures that the agreement continues to reflect current realities and aspirations. For the end date, the parties could state that the MOU term ends after three full academic years or another date in the foreseeable future. Both parties may want to consider including a renewal clause and an option to discontinue with notice.
- **Exhibits and attachments.** Making references to additional documents, policies, and procedures that shape the program’s daily activities through attachments or exhibits allows the parties to be more concise in the main document. Only a high-level overview needs to form the body of the agreement. Including these ancillary pieces gives the project context and may encourage the parties to think critically about issues that could require separate governing policies.

Examples of attachments:

- > enrollment targets and completion goals;
- > student discipline and dismissal policies;
- > faculty code of conduct; and
- > list of primary contacts for various roles and responsibilities at the prison and college.

---

### Examples of corrections responsibilities

- Provide classroom space in the facilities for college courses.
- Provide storage space for instructional materials.

### Examples of college responsibilities

- Develop and implement courses, certificate, and degree programs.
- Provide pedagogy training for faculty who teach in the corrections facilities.

### Joint duties

- Discuss and draft policies for student disciplinary procedures and dismissal. This may include a multidisciplinary team meeting prior to removal and options for alternative sanctions (such as substance use treatment for someone found possessing drugs or cognitive intervention for communication issues).
- Consider the issue of students’ movement within the prison as well as transfers between corrections facilities and draft policies that take these factors into account.

---

Examples of corrections responsibilities	Examples of college responsibilities	Joint duties
<ul style="list-style-type: none"> <li>Review and approve program materials and curriculum for security concerns if required.</li> </ul>	<ul style="list-style-type: none"> <li>Provide an overview of the program goals and structure to corrections staff.</li> </ul>	<ul style="list-style-type: none"> <li>Develop a data-sharing agreement including protecting Family Education Rights and Privacy Act (FERPA)-related data.<sup>a</sup></li> </ul>
<ul style="list-style-type: none"> <li>Facilitate the screening of students to determine qualification—verified high school diploma, GED score, etc.</li> </ul>	<ul style="list-style-type: none"> <li>Lead orientation for new students prior to the beginning of the semester.</li> </ul>	<ul style="list-style-type: none"> <li>Clarify information technology responsibilities, limitations, and requirements.</li> </ul>
<ul style="list-style-type: none"> <li>Screen college faculty, staff, and volunteers for security clearance.</li> </ul>	<ul style="list-style-type: none"> <li>Provide corrections facilities with a list of classes to be offered and a schedule of the times classes will be offered.</li> </ul>	<ul style="list-style-type: none"> <li>Develop a communications plan for press releases and graduations.</li> </ul>
<ul style="list-style-type: none"> <li>Provide security training and orientation for college faculty and staff.</li> </ul>	<ul style="list-style-type: none"> <li>Provide syllabi for students for each course taught during each term.</li> </ul>	<ul style="list-style-type: none"> <li>Troubleshoot course continuity during widespread disruptions or facility lockdowns.</li> </ul>
<ul style="list-style-type: none"> <li>Clearly identify the dedicated administrator(s) who will ensure the above responsibilities are fulfilled.</li> </ul>	<ul style="list-style-type: none"> <li>Clearly identify the dedicated administrator(s) who will ensure the above responsibilities are fulfilled.</li> </ul>	<ul style="list-style-type: none"> <li>Develop schedules and procedures for annual reporting and audit or program reviews.</li> </ul>

---

<sup>a</sup>. The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education. U.S. Department of Education, “Programs: Family Educational Rights and Privacy Act (FERPA),” <https://perma.cc/ZX62-NSMN>.

# Unit 5: Determining program funding, financial aid, and budgets

Colleges draw on many different funding sources to operate programs in prison. Prior to SCP, most funding came from state allocations through DOCs or from private foundations.<sup>12</sup> Generally, colleges use one of two funding models: program-based funding and student-based funding. Under the program-based model, colleges receive either grants or contracts from DOCs or private sources and pay for the cost of instruction, equipment, supplies, and overhead without charging tuition to individual students. Under the student-based model, colleges determine a tuition and fee schedule and charge individual students for the cost of attendance. A comparison of the two funding models is in Figure 1, below.

If the college is going to use a student-based funding model, it will need to create a supportive process for students to apply for financial aid.

Figure 1

## Funding sources for postsecondary education programs in prison

Funding model	Advantages	Disadvantages	State examples
Program-based	<ul style="list-style-type: none"> <li>Total costs may be less than the student-based model if colleges are required to charge the same tuition as campus.</li> <li>More flexible funding for equipment and supplies.</li> </ul>	<ul style="list-style-type: none"> <li>Cannot be used with financial aid.</li> <li>Generally, students do not count toward state enrollment and performance targets for publicly funded colleges.</li> </ul>	<ul style="list-style-type: none"> <li>Washington State’s interagency agreement between DOC and the state Board for Community and Technical Colleges provides all-inclusive funding for dozens of postsecondary programs at no cost to the student.</li> </ul>
Student-based	<ul style="list-style-type: none"> <li>Can be used with federal and state financial aid (if otherwise eligible)</li> <li>Students may count toward state enrollment and performance targets for publicly funded colleges.</li> </ul>	<ul style="list-style-type: none"> <li>FAFSA process can be difficult to complete.</li> <li>Student incompletes and withdrawals have long-term consequences for future financial aid.</li> </ul>	<ul style="list-style-type: none"> <li>Milwaukee Area Technical College awards Pell Grants through the Second Chance Pell Experiment as well as state financial aid to students to pay tuition, fees, and supplies.</li> </ul>

Because restrictions on Internet access in prison are common, colleges typically develop a process for incarcerated students who must file the FAFSA.<sup>33</sup> In addition, many states have need-based state aid for which incarcerated students may be eligible that can be awarded in addition to or in place of federal financial aid, and GI Bill-eligible veterans can use their education benefits to pay for tuition and program costs. Some incarcerated postsecondary students who are ineligible for financial aid pay for classes directly or have had third-party payees, such as private foundations or tribal education offices, pay for tuition.

SCP colleges have worked to ensure that they charge incarcerated students only fees that apply to their satellite campus and the college services accessible to them there. For example, these colleges do not charge incarcerated students for campus-based health center or parking fees. In addition, colleges have charged fees to incarcerated students that students on their other campuses do not pay, again to account for the particular circumstances of the satellite campus. Several colleges have created a flat fee for incarcerated students that covers the cost of books, supplies, transcript costs, and materials (in several cases, including laptops). The colleges can then purchase these supplies on behalf of the student and deliver them to the prison.

Regardless of the funding model, colleges should calculate the full cost of delivering the program, including faculty and staff salaries and benefits, office supplies, books and instructional supplies (such as welding materials and lab components), equipment and tools, and travel. By understanding the full cost of the program, coordinators can build budgets, set enrollment goals, identify opportunities for cost-sharing with corrections partners, and search for alternative funding sources to ensure the program's long-term sustainability.

# Unit 6: Creating academic and operational calendars

---

Faculty, staff, and students will benefit from having both academic and operational calendars to guide the postsecondary program.

Both correctional and college staff can use academic and operational calendars that identify course schedules, cohort start dates, enrollment and financial aid deadlines, due dates for ordering supplies and materials, and meeting dates.

To develop an annual academic calendar, the program coordinator and faculty should determine the preferred order of classes based on whether the program enrolls students in a cohort or ad hoc. The academic calendar does not need to name specific courses but should indicate the subject area that will be taught during the term. For example, if a degree program requires several humanities courses, the academic calendar should indicate in which term humanities courses will be offered. Programs that have many prerequisites or a defined sequence of courses should consider when new students can enter. For example, vocational programs such as welding or automotive maintenance require students to complete courses in a specific order, often in a cohort; colleges should use their academic calendar to identify when new cohorts can form. This will help staff and faculty to recruit and advise students accurately. In addition, many prison programs are able to operate year-round without a traditional summer break, which can shorten the time needed to complete a degree or certificate. The implementation team should discuss whether the program will include full summer terms, as this will affect financial aid, faculty contracts, and student recruitment.

For an operational calendar, program coordinators can work with campus advisers to determine enrollment and financial aid deadlines as well as dates that govern faculty contracts. The implementation team should use the DOC's "offender management system" to set dates for assigning students to the program. Given that multiple agencies are involved in these projects, it is a good idea to schedule regular check-in meetings with the DOC at both the headquarters and facility level to ensure all operational tasks are progressing on the agreed-upon schedule.

# Unit 7: Recruiting and training college personnel

---

**R**ecruiting a team of faculty and staff is possibly the program coordinator's most important undertaking. Program coordinators should work with their implementation team and current and former students to set core values and competencies that faculty and staff will need to demonstrate. Much of the success of the program will depend on a team of faculty and staff who are adaptable to the challenges of working in a prison environment and dedicated to the education of incarcerated people.

Working with college administrators, program faculty, and the implementation team, the program coordinator should create job descriptions for all program (faculty and staff) positions that state the core values and competencies faculty and staff should hold as well as the specific circumstances—security level, required background checks and training, potential for violence—under which people will be working. The coordinator should hold information sessions for prospective faculty members that include classroom tours and meeting students in prison.

Colleges should create a faculty interview process that matches the campus method but includes additional stakeholders. They should consider including currently or formerly incarcerated students as well as corrections partners. Final decision making about hiring and placement should remain with the college.

It is important to orient and train new instructors to teach in the prison. Some corrections agencies will require a facility safety and security orientation, while others require faculty members to complete a multi-week correctional worker training. Colleges should offer orientation sessions to new teachers that supplement any required DOC training. Some corrections education directors recommend having experienced staff or faculty members join new teachers on the first several days to help orient them to the process of entering and leaving the prison. Vocational faculty members may benefit from a period of job shadowing to learn the prison rules regarding tool control and supervision.

## Unit 8: Recruiting, enrolling, and registering students

---

**R**ecruiting and enrolling students will draw on the strengths of all implementation team members.<sup>14</sup> Depending on the funding model, many programs—especially those relying on financial aid—will need to recruit a large applicant pool in order to enroll the target-sized cohort while accounting for attrition that will occur as students are found to be ineligible for financial aid.

A good first step in developing an equitable recruiting strategy is to understand the racial and ethnic makeup of the prison population and to consult DOC partners on how to conduct adequate outreach to the various communities within the prison. Colleges should be prepared to use a variety of recruiting tools including posters, flyers, information sessions, meetings with facility staff, and word of mouth to reach students who may be connected to a variety of prison subcultures.

Many people enter prison without a high school credential. To reach students at different points in their educational journeys, some colleges have collaborated with adult basic education providers at the prison to create a pipeline of students who complete their high school credentials and then enroll in college. Colleges should also expect to support students in acquiring transcripts. Many people in prison do not have the means or ability to order transcripts easily because of the difficulty of finding contact information at the relevant colleges, high schools, or education departments. Online-only transcript request forms and fees can be insurmountable hurdles to incarcerated students trying to gather these records on their own.

Colleges should create a supportive and transparent application and admissions process. Overall, people in prison are likely to have low college literacy. In-prison postsecondary education programs should follow the college's admissions process as much as possible but be prepared to adapt it to the reality of prison life and applicants' knowledge level. Some common practices in the community may present barriers for people in prison. For example, while colleges commonly use online application forms, few

incarcerated people have Internet access. Application fees become a barrier for many incarcerated people who typically earn less than \$1 per day. And required placement testing may deter prospective incarcerated students who have had negative past experiences in education settings.

The implementation team can improve students' preparation for college by providing a regular advising schedule with college student services staff such as counselors, educational planners, and faculty advisers. Because of the limitations on communication in prison, students will need support in completing the financial aid process, understanding documentation requirements, and gathering all the information needed to successfully apply for aid. Colleges should plan in-prison office hours or financial aid workshops to address these challenges. Specifically, colleges can expect and should prepare to assist students with financial aid barriers such as name changes and problems retrieving forgotten Social Security numbers, student loans in default, failure to register for the Selective Service, inability to find or receive tax records, and family members' reluctance to share financial information (often needed for students under age 26).

### Using a robust application process

Founded in 2012, the New Jersey Scholarship and Transformative Education in Prisons Consortium (NJ-STEP) is a consortium of colleges based at Rutgers University–Newark and including Raritan Valley Community College and Princeton University. Together, these colleges offer an associate and a bachelor's degree to 550 incarcerated students in the state. After several years of open admissions, NJ-STEP adopted an application process, finding it to be a good tool for setting student and college expectations. By

completing the written statement and participating in required interviews, students were better able to decide whether they wanted to commit to the program, and the colleges were better able to identify students who would finish at least one term. The application process reduced the number of dropouts per semester and enabled the college to maintain adequately robust college classrooms for group learning, preserving scarce program resources and enhancing the student academic experience.

# Unit 9: Creating a learning environment

---

Postsecondary classroom space varies greatly in prison. Some programs have access to dedicated classrooms, libraries, computer labs, and faculty offices, while others share space with existing adult education programs or use visiting rooms to conduct classes. Regardless of the specifics, accreditation requires in-prison postsecondary education programs to create a satellite location that offers students access to key aspects of a learning environment such as tutoring, library services, computer labs, and quiet study areas to complete homework or prepare for tests.

One of the most challenging aspects of college study in prison has been providing access to library resources. The implementation team can set up ways to supply academic and vocational materials, including arranging for the college to partner with the prison library to lend necessary books and articles, working with the college library to gain secure access to JSTOR and EBSCO journal databases in a DOC-approved format, and creating a college library in a study lab or classroom where students can borrow books and materials.

Corrections agencies throughout the country have found creative ways to support or even supply technology tools for both academic and career-technical credential programs.<sup>15</sup> Although devising a plan that meets the learning objectives of the college and the security mandates of the corrections agency is challenging, there are many examples of successful technology implementation including programs using the Internet, 3D printing, aerospace composites, and wind turbines. Career-technical programs, in particular, will want to ensure that they use technology that meets industry standards. Postsecondary programs should discuss with the DOC what technologies it currently allows and the approval process for new technologies.

Bringing equipment, tools, and supplies into a prison takes time. The program coordinator should work with the implementation team to map out an approval process for bringing materials into the prison. For example, some facilities require routing all materials through the mailroom or

warehouse while others allow faculty members to bring supplies into the prison when they arrive for class sessions. In addition, DOCs have detailed policies that determine which tools and equipment incarcerated students can use and how they must be stored. In nearly all cases, the DOC has to approve materials for distribution to students.

Finally, the college needs to clarify what means of communication the facility allows between faculty, staff, and students outside of class time. Students may be allowed to use paper-based or electronic messages to communicate with the college. DOC partners will be able to direct the program coordinator to the policy that governs faculty-student communications. Reviewing this policy, the college will need to determine how to adhere to FERPA guidelines when sending or receiving student data through the agreed-on medium.

## Promoting a culture of learning and leadership

### Student leadership opportunities

Walla Walla Community College (WWCC) provides leadership opportunities for its students at Washington State's Coyote Ridge Corrections Center through a Student Voice Council. Started in 2017 with permission from the facility superintendent, the nine-member Student Voice Council meets monthly with college leadership to address concerns raised by current and former students. The main goals of the group are to promote and conduct student activities, facilitate collaboration and interaction between incarcerated students (including alumni) and campus students, and promote a culture of learning and positivity within the corrections environment. Examples of issues the council raised include scheduling concerns, the need for weekend and evening courses, lack of access to computer labs outside of class time, and guidance on future educational programs. The council

is connected to WWCC's Associated Student Body, which provided funding to support student tutors and computer labs.

### Library services

Florida Gateway College (FGC) was selected for SCP in 2016. FGC enhanced its programming for incarcerated students by creating a library and computer lab with Internet accessibility and additional learning resources. Students admitted into FGC's SCP program are transferred to the Columbia Correctional Institution Annex and housed together in an open dorm. The library is located in the dorm and gives incarcerated students 24-hour access to computers and books. Students also have access to FGC's library catalog and can request books that are delivered to their dorm library. The library also gives incarcerated students limited access to the campus's online research database.

# Unit 10: Planning for emergencies

---

The COVID-19 pandemic has demonstrated the need to plan for emergencies in carceral facilities. Experience has taught postsecondary programs in prison the importance of developing policies related to student leaves of absence, class withdrawals, and alternative instructional methods. By planning at the beginning of program development for emergencies, the college will be better prepared to continue operations and meet the needs of students during periods of disruption.

Colleges can expect and should plan for four kinds of prison program disruptions:

- › restrictions on individuals or small groups of students;
- › restrictions that halt individual courses;
- › facility-level program restrictions caused by lockdowns or weather; and
- › statewide security-related program restrictions.

Programs should be prepared for midterm student transfers between facilities. The implementation team should identify relevant college policies regarding withdrawal, leave of absence, and program suspension and include them in faculty and student handbooks. Working with the college registrar, the implementation team can determine how to handle midterm student transfers, considering options such as classifying the student as withdrawn, giving the student an incomplete, or offering the student the opportunity to complete the course remotely. Some colleges have sent faculty members or worked with prison education staff at the new facility to proctor final exams. Colleges that are using federal financial aid will need to determine how Return to Title IV (R2T4) will be handled for students who are withdrawn or transferred before the end of the course.<sup>16</sup>

Colleges should create policies and procedures to handle individual or small-group restrictions. For example, the college should have a policy addressing what happens to a student's enrollment if the DOC removes

them from class for security reasons. Although a college can look at its campus student policies for guidance, there are some circumstances characteristic of the prison environment that may arise. For example, students who have been sent to segregation or are in a unit under an extended lockdown may have restricted access to education. Some colleges have developed alternative ways to deliver course content in the event

---

**The implementation team should consider and plan for security issues that may arise within individual programs, in particular, career-technical programs.**

---

students are not able to attend class, such as sending course packets, using correspondence education, or providing telephone hotlines staffed by faculty.<sup>17</sup> Colleges that are part of SCP must meet distance learning requirements to remain eligible for Title IV funding.<sup>18</sup>

The implementation team should consider and plan for security issues that may arise within individual programs, in particular, career-technical programs. Because many of these programs use tools and equipment, they often experience disruptions ranging from missing tools to student injuries. Program coordinators should discuss with the implementation team what steps will be taken if a problem arises related to tools, equipment, or in-class behavior, what the program will need to do to return to operation, and how long a disruption they should be prepared to withstand.

Long-term program disruptions also require forethought. Colleges should consider what communication methods they can use within the prison to support distance learning in case of facility or statewide restrictions on in-person teaching, such as a facility lockdown. Many

DOCs have tablets or email kiosks that programs could use to continue communicating with students with approval from the corrections agency.<sup>19</sup> The COVID-19 pandemic has shown the need for a back-up teaching plan using existing videoconferencing, email and messaging systems, learning management systems, and telephones in the event of a sudden and indefinite disruption. All emergency changes in teaching modalities should have expiration dates. Colleges and corrections agencies should schedule a time to revisit and reconsider modality changes.

Bad weather or facility lockdowns often cause programs to reschedule or suspend classes. Colleges can look to their faculty contracts and college inclement weather policies for guidance and discuss with DOC partners how the program will handle weather-related campus closures while the prison is still open and operating. These disruptions may affect the college's ability to meet its required contact hours for accreditation. One solution is to build in the opportunity to add class meetings to the academic calendar should disruptions threaten accreditation.

Colleges should discuss with the implementation team and financial aid office how students will complete financial aid applications during widespread program disruptions in which faculty and staff are unable to meet directly with students. Some colleges have developed detailed instructions on how to complete financial aid applications that students can follow on their own.<sup>20</sup>

### College responses to COVID-19

Jackson College, with support from the Michigan Department of Corrections (MDOC), was able to implement an emergency distance-learning model to continue courses at seven state prisons (Cotton, St. Louis, Gus Harrison, Parnall, Women's Huron Valley, Cooper, and Lakeland) during the COVID-19 pandemic. At the time, the MDOC had very limited technology options to support distance-learning models, but students had access to email through kiosks and tablets from a proprietary communications company. By leveraging their relationship

with the company, trust from MDOC, and existing access to the email system, Jackson College was able to expand its communications between students and faculty at no cost to the students and meet ED's requirement for "regular and substantive communication" in distance learning. Combined with physical content delivery, the electronic communications were key to meeting the distance-learning requirement of the SCP during the pandemic, allowing students to complete their studies without significant interruption.

# Looking to the future

---

While getting to the first day of classes is a significant milestone, it is only the beginning of a long-term commitment to offering postsecondary education in prison. As more colleges launch programs in prisons, they join a community of educators who are working to affirm human dignity behind bars by recognizing their students' fundamental capacity for growth and change. To gain support in this work, colleges and corrections agencies can connect with local and national networks of colleges, corrections agencies, and nonprofits seeking to achieve the same goals. Colleges can participate in the community of schools teaching in prison by attending conferences and joining online groups. The Alliance for Higher Education in Prison, the Corrections Education Association, and the Coalition on Adult Basic Education offer conferences throughout the year. Finally, program coordinators can look to develop and expand their programs by building pathways to community postsecondary programs;<sup>21</sup> collecting data on key outcome measures;<sup>22</sup> creating a feedback loop from program participants and former students; developing a consortium of local colleges working in prisons; and celebrating student success through graduations, honor societies, and awards.

## Building a reentry center on campus

Metropolitan Community College (MCC) in Omaha, Nebraska, created an on-campus reentry center in 2015 to help support students served by MCC's 180 Re-entry Assistance Program. The center serves as a landing spot for people exiting Nebraska jails, prisons, and treatment centers. The 8,000+-square-foot building is a welcoming, supportive environment with access to peer support groups and life skills workshops; support staff to help students apply for financial aid and scholarships as well as register

for short-term trainings or college credit classes; a criminal history-friendly job center to assist students looking for work; a reentry pantry to provide immediate access to hygiene, laundry detergent, clothing, and nonperishable food items; assistance with work needs (footwear, tools, special attire, bus passes) and supportive documentation (birth certificates and identification); and a computer lab for students to job seek, complete homework, meet with tutors, and complete online trainings.

## Task worksheets for building an in-prison postsecondary education program

Building an in-prison postsecondary education program involves many actors and sequential actions that support a successful launch. These include the formulation of goals, standards, procedures, and evaluative measures, and the marshaling of resources and infrastructure.

The checklists that follow can keep everyone on track in the work leading up to the first day of class and beyond. For ease of use, the program's creators in the carceral and college communities should duplicate the lists and distribute them to all project participants.

### Worksheet A: Forming an implementation team

#### Objectives

1. Engaging subject-matter experts and decision makers in a collaborative effort to start a new education program.
2. Establishing ongoing communication channels between the main campus and the prison program as well as among the prison program, department of corrections (DOC) facility leadership, and DOC headquarters.

#### Tasks for the program coordinator and the team

- Connect with senior DOC leadership as early as possible. Ensure senior leadership at DOC and the college are aware of the program.
- Identify pivotal people to join the implementation team, including
  - › program coordinator,
  - › college financial aid director or designee,
  - › college chief academic officer or designee,
  - › DOC education director (headquarters-level) or designee,
  - › DOC assistant warden or superintendent in charge of programming, and
  - › other possible members. Each state, DOC, and college has aspects of its structure or mission that may require including other key members on the team. Other possible members include the college grants manager, business office personnel, DOC facility education director or principal, DOC plant manager, DOC or college IT director or staff, student services director or staff, or dean or director of workforce.
- The team members should set up a schedule of monthly meetings. Over time, the team can reduce the meeting frequency.
- The team should set implementation milestones and monitor progress toward them.
- The program coordinator should connect with additional stakeholders, supporters, and staff, including:

- 
- › currently and formerly incarcerated people;
  - › campus programs such as TRIO; services for veterans, underrepresented and non-traditional student services, and the educational opportunity center;
  - › human resources;
  - › disability support services;
  - › community corrections (probation or parole);
  - › DOC public information office;
  - › college's institutional effectiveness and research office;
  - › career services;
  - › office of student services; and
  - › community industry partners and employers for workforce programs.
- The coordinator should clarify the implementation team's reporting structure and learn what decisions can and need to be made at the local prison level versus at headquarters level.

---

## Worksheet B: Setting up a satellite campus and designing the program

### Objectives for the implementation team

- Establishing the site as an additional location with the regional accreditor and state higher education coordinating board if necessary.
- Setting up the new location within student, enrollment, and financial management systems.
- Determining the degrees or certificates the program will offer and the roster of courses required for completion.
- Creating a faculty and staffing model and determining hiring needs.
- Deciding how to provide academic supports, such as library resources, tutoring, academic advising, or faculty office hours.
- Building support for the postsecondary program within the prison facility staff.
- Developing program policies and procedures.

### Tasks for the implementation team and the program coordinator

- Work with the college administration to add the new program to the college's accreditation.
- Determine whether the college needs to notify the state higher education coordinating board.
- If using federal financial aid, notify the U.S. Department of Education and update the program participation agreement (PPA).
- Work with the college business and enrollment management offices to add the new location to financial and enrollment management systems.
- Reach out to facility staff and teachers to explain the program and to learn about opportunities for collaboration. The program coordinator can work with the implementation team to identify specific roles and groups with which to meet including
  - › correctional counselors;
  - › shift security such as lieutenants and shift sergeants;
  - › correctional industries managers;
  - › chaplain and activity directors; and
  - › social, religious, and cultural groups of incarcerated people.
- Identify the number and location of classrooms that will be needed for the program by working with DOC facility leadership.
- Engage faculty, the campus program advisory committee, and the student advisory committee to select courses.
- Create a staffing model. Effective and efficient program operation depends upon some level of administrative support. Key administrative tasks include

- 
- › recruiting students, assisting them with financial aid paperwork, and enrolling them in their courses;
  - › ensuring classrooms are set up and supplied with classroom materials;
  - › adding courses to the prison scheduling or call-out program so that students receive permission to attend classes; and
  - › coordinating student attendance and use of space with other prison programs.
- Create a faculty model. The type (academic or career-technical) and size of the program will dictate instructional needs. The program coordinator has to
- › coordinate with the college's chief academic officer to determine if faculty teaching in prison will be full or part-time;
  - › coordinate with individual academic departments to identify appropriate faculty for the prison; and
  - › work with human resources and the business office to resolve questions about faculty reimbursement for travel and training, opportunities for volunteer instructors, training, and representation of prison-based faculty in college leadership forums.
- Collaborate with student services on campus to create a plan for advising, counseling, and support services.
- Decide how to orient students to the program.
- Document program descriptions, policies, and procedures in print and online that advisers, corrections counselors, and students can use to understand program requirements, outcomes, course summaries, more advanced degrees, and likely employment opportunities.
- Adapt existing college policies and write procedures for operating the program. The college should have policies including, but not limited to, the following:
- › prerequisites and program qualifications;
  - › satisfactory academic progress;
  - › program withdrawal;
  - › student transfers and program holds that keep students from being transferred until after the program is finished;
  - › classroom expectations and student discipline;
  - › grades for student incompletes resulting from transfers, segregation, or security-related issues;
  - › academic code of conduct;
  - › faculty code of conduct; and
  - › use of technology.

---

## Worksheet C: Determining program funding, financial aid, and budget

### Objectives

1. Determining how the program will be funded (entirely by tuition, grants or state funds, or a combination thereof).
2. Creating a supportive process for students to apply for financial aid.
3. Calculating the tuition and fee structure.
4. Creating a realistic budget that includes revenue projections, any portions of salaries and benefits that will be paid directly out of the program's budget, and goods and services needed to operate.

### Tasks for the program coordinator and the financial aid director

- For publicly funded colleges, determine if the program will operate as a traditionally funded state program or under a contract or self-support model.
- For privately funded colleges and publicly funded colleges with high tuition, determine how the college will handle the difference between student financial aid and the cost of tuition.
- Consider non-financial aid resources to offset program costs such as Workforce Innovation and Opportunity Act Title I and Title II, Perkins, private foundations, and fundraising.
- Create a process for students to apply for financial aid.
- Look for additional financial aid and develop a process for self-pay or third-party payees such as veterans' benefits, private foundations, or tribal education offices.
- Create a schedule of tuition and fees that is transparent to students.
- Calculate the full cost of delivering the program including faculty and staff salaries and benefits, office supplies, books and instructional supplies (such as welding materials, lab components, etc.), equipment and tools, and travel.
- Discuss program needs with corrections partners and other stakeholders to identify opportunities to share costs.
- Determine how Return of Title Four (R2T4) Funds will be handled for students who are dismissed from the program.

---

## Worksheet D: Creating academic and operational calendars

### Objectives

1. Creating a predictable, dependable program by publishing an annual academic calendar that staff and students can use to plan.
2. Creating an operational plan that identifies important due dates, events, and reporting requirements.
3. Preparing for contingencies such as lockdowns, snow days, and movement delays.

### Tasks for the program coordinator and faculty

- Map out a two-year academic calendar.
- Determine the preferred order of classes based on whether the program enrolls students on a cohort or individual basis.
- Consider whether to follow the college's campus term schedule or a schedule developed specifically for the prison.
- Identify important deadlines that faculty, staff, and students must meet and publish them in a calendar.
- Schedule periodic check-in meetings with the DOC at both the headquarters and facility levels.
- Publish the class schedule for students, college staff, and correctional staff on bulletin boards, websites, and intranets. Include information on enrollment, prerequisites, and ways to ask questions.
- Decide if the program will offer student success courses or developmental precollege courses.
- Discuss with the implementation team how to handle lockdowns, weather-related suspensions, or class delays. Key questions to answer are:
  - › Will classes be suspended or rescheduled in the event of a lockdown or delay? (This may depend on the delay's length or at what point during the term a delay occurs.)
  - › Can classes use a non-term or alternative schedule such as going beyond the end of the term?
  - › What will instructors do during a lockdown or delay? Will they be considered essential staff and allowed to continue teaching?
  - › How are grades handled if classes are delayed or suspended? Does the college have a leave-of-absence policy that students can use? What are the consequences of incompletes or withdrawals on satisfactory student progress?
  - › How will communication with students be handled and what will be the expectations of faculty to communicate with students during an extended lockdown?

---

## Worksheet E: Recruiting and training college personnel

### Objectives

1. Recruitment of qualified instructors and staff who share the program's goals using an inclusive recruiting process.
2. Orientation of instructors and staff to teaching and working in the prison.
3. Providing college personnel with DOC-required training.

### Tasks for the implementation team and program coordinator

- Identify core values and competencies that teachers and staff should have to teach and work in the postsecondary program.
- Offer interested instructors information sessions that include classroom tours and meeting students.
- Work with human resources to see if full-time instructors can count their teaching in the prison program toward their full-time load.
- Work with human resources to determine what happens if a faculty or staff person loses access to the prison or fails to pass a background check required to gain access.
- Create an inclusive interviewing process that includes incarcerated students.
- Consider including corrections partners in the interview process.
- Arrange for job shadowing opportunities for vocational faculty to learn prison tool control, safety, and security procedures.
- Develop a faculty handbook that addresses the specific policies and practices of the in-prison postsecondary program.
- Offer orientation sessions to new teachers. These should supplement and compliment any required DOC trainings.
- Assign experienced instructors or staff to enter the prison with new instructors on the first several days to help orient them to the security process.
- Determine any requirements for DOC screening and training.

---

## Worksheet F: Recruiting, enrolling, and registering students

### Objectives

- Recruiting the widest and most diverse possible pool of qualified students from the prison population.
- Admitting a representative cohort of students into the program.
- Enrolling students in classes suited to their skills and interests and supportive of their advancement within their program of study.
- Partnering with adult basic and secondary education programs at the prison to create a pipeline of students who are prepared for college study.

### Tasks for the implementation team and program coordinator

- Determine eligibility criteria. The program coordinator and the implementation team should identify likely students by
  - › clarifying what eligibility criteria DOC is applying for participation (such as custody level, behavioral record, security clearance, number of years until release); and
  - › determining the eligibility criteria that the college will apply for participation (such as college placement testing levels, prior educational requirements).
- Develop or modify college recruiting materials (posters, flyers, and program sheets) for use in the prison. Recruit a diverse pool of eligible students through multiple means such as
  - › distributing recruiting materials to living units, day rooms, and visiting rooms;
  - › meeting with DOC counselors, adult basic education teachers, and other staff to explain the program and share recruiting materials. Ask education staff to identify potential champions of the program (tutors or others who have a keen interest in education);
  - › sending out email alerts to all DOC staff including officers and work supervisors about the program and who is eligible;
  - › sending out e-messages (sometimes called “kiosk messages”) or paper flyers to the facility’s incarcerated population if possible;
  - › announcing the program through bulletins on facility television stations and in facility newsletters; and
  - › hosting information sessions for interested incarcerated people at a variety of times including evenings and weekends to accommodate work schedules.
- Create a pipeline of students by partnering with existing educational programs.
- Be prepared to assist applicants in finding transcripts.
- Follow the college’s admissions process as much as possible but be prepared to adapt it to the reality of prison programs.

- 
- Determine the college's policy on placement into college-level math and English. If the college requires placement testing, consider
    - › scheduling multiple dates for placement testing to accommodate incarcerated peoples' work and program schedules;
    - › including information and practice materials about placement testing at the program orientation;
    - › providing pre-placement prep courses to help applicants place higher and more accurately on placement tests; and
    - › adopting student self-directed placement, if allowed by the college.
  
  - Include opportunities for advising and counseling throughout the recruiting and enrollment process. The program coordinator and implementation team can improve student understanding of college and expectations by
    - › creating a regular schedule of advising hours that applicants can sign up to attend;
    - › ensuring college student services staff such as counselors, educational planners, and advisers attend program orientations; and
    - › working with the facility to allow calls, video conferencing, or email (if applicants have access) with advisers and counselors if allowed by the DOC and if in-person advising is unavailable.
  
  - Provide support for students completing the financial aid process. Plan office hours or workshops to assist students. Specifically, colleges can expect and should prepare to assist students with financial aid barriers such as
    - › name changes and problems with Social Security numbers;
    - › student loans in default;
    - › failure to register with the Selective Service System;
    - › inability to find or receive tax records; and
    - › family members' reluctance to share financial information (required for students under age 26 seeking financial aid).

---

# Worksheet G: Creating the learning environment

## Objectives

1. Creating classrooms that are conducive to learning and appropriately resourced.
2. Offering opportunities for students to learn and complete homework outside of class time.
3. Providing a rich learning experience that includes college-level support services, technology, and library resources.

## Tasks for the program coordinator

- Walk through potential classroom spaces and identify any necessary work to prepare them for college use.
- Prepare classrooms for use, specifically:
  - › Ensure that there are enough desks and chairs for the anticipated numbers of students and if needed, request additional furniture from the facility or get prison approval to supply furniture from the college or a vendor.
  - › Ensure that whiteboards, chalkboards, and walls are ready for anticipated uses and identify any supplies instructors will need to bring in and out of the facility, such as markers, chalk, or erasers.
  - › Identify any technological teaching tools that are available in classrooms, such as computers, projectors, and projector screens and confirm whether college instructors can use these resources.
  - › If using on-site computers, determine how instructors can transfer information to the computers (that is, using portable drives or email).
  - › Ensure that lockable filing cabinets are available for teachers to store student work.
  - › Schedule a classroom walk-through with security staff and teachers to ensure that there is a safe layout including an emergency exit.
  - › Determine if there are on-site printers, if instructors and/or students can use them, and who will replenish paper and ink.
  - › Coordinate with DOC partners about whether the college can hang signs, posters, or banners bearing the college logo within the education area, classrooms, or on the building's facade to support a sense of connection between students and the college.
- Identify ways for students to study outside of class. Program coordinators can work with their implementation team to
  - › Review any policies and procedures that limit the ability of students to study in dayrooms or facility libraries.
  - › Create a study lab outside of regular class time supervised by postsecondary staff, faculty, or college volunteers.

- 
- ❑ Determine how the college will provide access to academic and vocational library materials. Program coordinators can improve access to these resources by
    - › partnering with the facility library to host books and articles that students will need to access;
    - › working with the college's library to secure access to JSTOR and EBSCO journal repositories in a format approved by the DOC;
    - › creating a college library in the study lab or classroom where students can check out books and materials; and
    - › partnering with campus-based librarians or student volunteers to complete research requests on behalf of incarcerated students.
  
  - ❑ Identify and discuss how to retrieve materials from students if they are transferred from the facility, placed in segregation, or no longer able to access the program.
  - ❑ Integrate technology in the classroom in partnership with the DOC.
  - ❑ Work with DOC security leaders to identify limits to technology.
  - ❑ Decide how to support students with tutoring.
  - ❑ Determine how to hire and compensate incarcerated tutors.
  - ❑ Ensure classrooms, students, and faculty have school and lab supplies.
  - ❑ Learn tool control policies and procedures and train instructors in their use.
  - ❑ Determine how to communicate with students outside of class.

---

## Worksheet H: Planning for emergencies

### Objectives

1. Creating policies and procedures to handle individual or small group restrictions.
2. Developing a plan for handling program restrictions and interruptions.
3. Preparing for long-term program disruptions.

### Tasks for the implementation team and program coordinator

- Ensure that college policies and practices clearly address incarcerated student restrictions.
- Understand restrictions that students may have if they are placed into segregation or their living unit is placed on an extended lockdown.
- Discuss possible responses to security issues that may arise within individual programs, in particular, vocational programs that use tools and equipment.
- Prepare a written policy and procedures for rescheduling or suspending classes as a result of inclement weather or facility lockdowns. Include review and sunset dates for emergency measures to help facilitate a return to normal operations.
- Identify what communication tools are available within the prison that could be used to support distance learning in case of facility or statewide restrictions such as a lockdown or pandemic. Postsecondary programs that choose to use technology to support distance learning during an emergency should
  - › clarify data ownership if using third-party communication tools such as tablets or DOC-provided email;
  - › create disclosures for both student and faculty explaining data ownership and if communication will be reviewed by DOC;
  - › check with the college's FERPA officer to understand what requirements and restrictions FERPA places on communication that goes through a third party;
  - › know if the college can send grades and other FERPA-protected information using third-party communication tools; and
  - › understand the definition of distance learning and the requirements the college must meet to comply with Title IV requirements.
- Discuss with the financial aid office how students will complete financial aid applications during widespread program disruptions in which teachers and staff are unable to meet with students.
- Discuss with the college enrollment office and registrar how to handle student transfers in the middle of term resulting from non-college-related causes.
- Identify college policies regarding withdrawals, leaves of absence, and program suspensions and include them in faculty and student handbooks.

---

## Endnotes

- 1 Goldie Blumenstyk, “By 2020, They Said, 2 Out of 3 Jobs Would Need More Than a High-School Diploma. Were They Right?” *Chronicle of Higher Education*, January 1, 2020, <https://perma.cc/P6BK-K7V7>.
- 2 Caroline Wolf Harlow, *Education and Correctional Populations* (Washington, DC: U.S. Department of Justice, Office of Justice Programs, 2003), <https://perma.cc/NJ8Y-UCNU>.
- 3 Ruth Delaney, Ram Subramanian, Alison Shames, and Nicholas Turner, *Reimagining Prison* (New York: Vera Institute of Justice, 2018), <https://perma.cc/22FK-F4ZW>.
- 4 Bruce Western and Becky Pettit, “Incarceration & Social Inequality,” *Daedalus* 139, no. 3 (2010), <https://perma.cc/V6V8-ZX2Y>.
- 5 Susan Sturm and Vivian Nixon, *Homegrown Social Capital: How Higher Education for Formerly Incarcerated Women Facilitates Family and Community Transformation* (Washington, DC: Ascend at the Aspen Institute, 2017), <https://perma.cc/932R-EAUF>.
- 6 Robert Bozick, Jennifer Steele, Lois Davis, and Susan Turner, “Does Providing Inmates with Education Improve Postrelease Outcomes? A Meta-Analysis of Correctional Education Programs in the United States,” *Journal of Experimental Criminology* 14, no. 3 (2018), 389-428, [perma.cc/NKE4-KDFK](https://perma.cc/NKE4-KDFK).
- 7 Amanda Pompoco, John Wooldredge, Melissa Lugo et al., “Reducing Inmate Misconduct and Prison Returns with Facility Education Programs,” *Criminology & Public Policy* 16, no. 2 (2017), 515-547, <https://onlinelibrary.wiley.com/doi/abs/10.1111/1745-9133.12290>.
- 8 Patrick Oakford, Cara Brumfield, Casey Goldvale et al., *Investing in Futures: Economic and Fiscal Benefits of Postsecondary Education in Prison* (New York: Vera Institute of Justice, 2019), <https://perma.cc/YP7W-UJ2J>.
- 9 Ibid.
- 10 Resources that discuss guiding principles and values in postsecondary education in prison include Ruth Delaney, Ram Subramanian, and Fred Patrick, *Making the Grade: Developing Quality Postsecondary Education Programs in Prison* (New York: Vera Institute of Justice, 2016), <https://perma.cc/HW7A-8KQQ>; Ruth Delaney, Fred Patrick, and Alex Boldin, *Unlocking Potential: Pathways from Prison to Postsecondary Education* (New York: Vera Institute of Justice, 2019), <https://perma.cc/HP5P-QKCH>; Tanya Erzen, Mary Gould, and Jody Lewen, *Equity and Excellence in Practice: A Guide for Higher Education in Prison* (St. Louis, MO: Alliance for Higher Education in Prison, and San Quentin, CA: Prison University Project, 2016), <https://perma.cc/EZN9-7EKU>; and Erin L. Castro and Mary Rachel Gould, “Higher Education in Prison: Thoughts on Building a Community of Scholarship and Practice” *Critical Education* 10, no. 13 (2019), 1-15, <https://perma.cc/YWC7-UZWD>.
- 11 For a resource on creating memoranda of understanding, see the U.S. Department of Education’s Experimental Sites Initiative webinar for Second Chance Pell, <https://perma.cc/HM9R-CTM5>.
- 12 For example, in Ohio, the Department of Rehabilitation and Correction (ODRC) offers postsecondary education through contracts with community colleges and state universities, whereby the schools are reimbursed by ODRC. ODRC, *Ohio Penal Consortium Fiscal Issues – 57-EDU-10* (Columbus, OH: ODRC, 2017), <https://perma.cc/JNZ7-ZMNN>. Jackson College in Michigan and Lee College in Texas offer postsecondary courses to incarcerated students who can pay for their own tuition either outright or with the assistance of scholarships and grants. Jackson College, Corrections Education Program, “Paying for College,” <https://perma.cc/NRK4-RUG7>; and Lee College, “Student Financial Aid (LCHC),” <https://perma.cc/CJ6V-4RZF>. Other institutions rely on philanthropic support to fund programming, described in L.S. Hall, “In a Major Grant, More Evidence That Prison Education Programs Are Gaining Steam,” *Inside Philanthropy*, October 16, 2015, <https://perma.cc/G42E-H3Q3>.
- 13 For a detailed look at how to help students complete the FAFSA, see Allan Wachendorfer and Michael Budke, *Lessons from Second Chance Pell: A Toolkit for Helping Incarcerated Students Complete the Free Application for Federal Student Aid* (New York: Vera Institute of Justice, 2020), <https://perma.cc/S7CZ-ZBW4>.
- 14 Terrell A. Blount, Todd Butler, and Heather Gay, “How Student Recruitment and Selection Can Impact Reentry Outcomes: Lessons from the Michigan Department of Corrections and Jackson College,” *Journal of Prison Education and Reentry* 4, no. 1 (2017): 29-33, <https://perma.cc/4MRY-KEXF>.
- 15 Kurtis Tanaka and Danielle Cooper, “Advancing Technological Equity for Incarcerated College Students: Examining the Opportunities and Risks,” *Ithaka*, May 7, 2020, <https://perma.cc/G2R6-WHS6>.
- 16 Requirements for the Return of Title IV funds (R2T4) govern the return of “unearned” federal student aid to the Department of Education when a student withdraws from all Title IV (for example, Pell-funded) courses before completing a term.
- 17 See Vera’s webinar “Reshaping Course Delivery in Response to COVID-19,” <https://perma.cc/Q9JL-EUM7>, for examples.
- 18 Correspondence instruction is not an allowable modality in the Second Chance Pell experiment. See U.S. Department of Education, “Experimental Sites Initiative Second Chance Pell Experiment Frequently Asked Questions,” November 21, 2019, <https://perma.cc/6GHP-9PHX>.
- 19 Tanaka and Cooper, “Advancing Technological Equity for Incarcerated College Students,” 2020, 30.
- 20 Wachendorfer and Budke, *Lessons from Second Chance Pell*, 2020, 29.
- 21 The implementation team should prepare the college campus to welcome students returning to the community. Many postsecondary programs have developed reentry centers on community campuses

---

or partnered with other organizations to support students as they continue their education. For example, many California universities have Project Rebound programs on campus to support returning students; Washington State community colleges host reentry navigators from the State Board for Community and Technical Colleges; and both Nebraska's Metropolitan Community College and Ohio's Sinclair Community College campuses have reentry offices and resource centers for formerly incarcerated students.

22 For an example of a proposed framework for performance indicators, see Michael Scot Brick and Julie Ajinkya, *Supporting Success: The Higher Education in Prison Key Performance Indicator Framework* (Washington, DC: Institute for Higher Education Policy, 2020), <https://perma.cc/L6QX-SA74>.

## Acknowledgments

The authors would like to thank the following people for their assistance in producing this guide: Allan Wachendorfer, Christen Williams, Robert Matthews, and Janeen Porter for helpful comments; Alice Chasan for editing and proofreading; Dan Redding for design; and Cindy Reed for overseeing the process. This work was made possible in part with generous support from the Ascendium Education Group.

## About citations

As researchers and readers alike rely more and more on public knowledge made available through the Internet, “link rot” has become a widely acknowledged problem with creating useful and sustainable citations. To address this issue, the Vera Institute of Justice is experimenting with the use of Perma.cc (<https://perma.cc>), a service that helps scholars, journals, and courts create permanent links to the online sources cited in their work.

---

### Credits

© Vera Institute of Justice 2020. All rights reserved.

An electronic version of this report is posted on Vera’s website at [www.vera.org/first-class](http://www.vera.org/first-class).

Cover photo: XiXinXing/Shutterstock

For more information, visit [www.vera.org](http://www.vera.org). For more information about this report, contact Ruth Delaney, program manager, at [rdelaney@vera.org](mailto:rdelaney@vera.org).

### Suggested citation

Brian Walsh and Ruth Delaney. *First Class: Starting a Postsecondary Education Program in Prison*. New York: Vera Institute of Justice, 2020.

Vera Institute of Justice  
34 35th Street, 4-2A  
Brooklyn, NY 11232  
T 212 334 1300  
F 212 941 9407

Washington, DC Office  
1111 14th Street, Suite 920  
Washington, DC 20005  
T 202 465 8900  
F 202 408 1972

New Orleans Office  
1307 Oretha Castle  
Haley Blvd., Suite 203  
New Orleans, LA 70113  
T 504 312 4516

California Office  
634 S Spring Street, #300A  
Los Angeles, CA 90014  
T 213 416 0058  
F 213 416 0075