



PROPOSED

'Best Interest of Students'

METRICS

for **Prison Higher Education**

GUIDANCE FROM PUBLIC COMMENTS

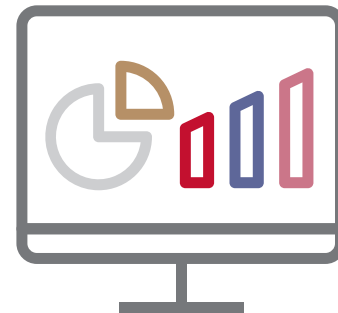
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**The Research Collaborative on Higher
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THE UNIVERSITY OF UTAH
Prison Education Project

Proposed ‘Best Interest of Students’ Metrics for Prison Higher Education: Guidance from Public Comments



On July 26, 2022, the Department of Education (ED) released its long-awaited Notice of Proposed Rulemaking (NPRM) regarding Pell expansion for incarcerated students. The result of negotiated rulemaking that occurred in the fall and winter of 2021, the NPRM contains significant additions to the FAFSA Simplification Act amendments through which Congress eliminated the ban on Pell Grants for incarcerated students in December of 2020. After ED released the NPRM, interested parties had until August 26, 2022 to submit public comments expressing support, requesting clarification, articulating critiques, and offering recommendations about the proposed regulations.

One of the topics commenters most frequently addressed was the “best interest” determination. The December 2020 legislation expanding Pell access listed metrics the oversight entity “may” use to determine whether a prison education program (PEP) is operating in the “best interest of students.”¹

In the NPRM, ED changed “may” to “must,” making all metrics but recidivism and rates of completion mandatory rather than optional.² Many public commenters objected to requiring these metrics, leading ED to state that only the “input” metrics (e.g. instructor credentials and advising access) are mandatory; “output” indicators like job placement rates and earnings are optional. Corrections officials have broad discretion to add other metrics in their role as the oversight entity. The current standing of best interest metrics are as follows:

MANDATORY

1. **Experience, credentials, and turnover rate of instructors**
2. **Transferability of credits earned in a PEP**
3. **Incarcerated students’ access to academic and career advising**
4. **Students’ ability to transfer to any campus in same modality³**

OPTIONAL

5. The percentage of students **continuing their education** upon release
6. **Post-release job placement rate**
7. Student **earnings** post-release
8. **Recidivism rates** among PEP students post-release
9. Incarcerated students’ **rates of degree completion**
10. **Other indicators** pertinent to success as determined by the oversight entity (OE)

RCHEP drafted the present brief to advise departments of corrections in their capacity as the oversight entity (OE) approving PEPs. Specifically, public comments suggest possible metrics that the oversight entity may use to determine whether a PEP is operating in the “best interest of students.” Importantly, even when ED declined to adopt particular recommendations, oversight entities can (and have) adopted them. Critical to understand is that ED’s final regulations grant oversight entities considerable latitude as they decide how to provide initial approval to PEPs.

Several corrections officials noted in public comments that they did not feel equipped to make decisions about higher education programming. Therefore, there is a significant opportunity to offer guidance and propose metrics for oversight entities to consider as they formulate the initial approval process for PEPs. This brief is intended as a resource for recommending or advising against adopting particular metrics during these early stages of Pell expansion by offering the rationale public commenters presented in support of opposition to specific metrics.

WHO WERE PUBLIC COMMENTERS?

Over fifty individuals and organizations submitted public comments on ED's Notice of Proposed Rulemaking. Our research team compiled a breakdown of public commenters that you can find here, with groupings below:

- Colleges and universities (16)
- Advocacy organizations (15)
- The U.S. House and U.S. Senate
- State correctional agencies (3) commented
- The Correctional Leadership Association
- Statewide prison higher education consortia/coalitions (5)
- One reentry organization and third party nonprofit facilitator

WHAT DID PUBLIC COMMENTERS SAY?

Many commenters focused on whether corrections agencies should be the OE determining whether PEPs are in the best interest of students and whether the metrics ED proposed for doing so were appropriate and feasible. Some commenters also noted that because ED gave PEPs two years to report on metrics, it was unclear what criteria OEs would use to admit PEPs initially.

ED responded by stating that corrections agencies must serve as the OE but that only the input indicators outlined in the NPRM will be mandatory; output indicators like job placement rates and earnings will be optional.⁴ Moreover, during the two years PEPs are collecting data, "there are no specific requirements for the initial approval, and the oversight entity can use whatever information it has available."

Below are topics public commenters addressed that may be helpful when making such decisions, including:

- Why proposed metrics are inappropriate
- Why accreditation standards are more appropriate
- Additional metrics suggested in public comments

Given their broad discretion to offer initial approval to PEPs, corrections agencies should rely on existing higher education to ensure quality, such as regional accreditation, and carefully consider what other metrics truly reflect the best interest of students.

WHY DID COMMENTERS SAY WHAT THEY SAID?

Public commenters articulated specific qualifications and criticisms regarding each proposed metric:



ED Proposed Metric	Criticism of Proposed Metric	Public Commenters Criticizing Proposed Metric
<p>Continued Education Post-Incarceration</p>	<ul style="list-style-type: none"> ✘ Corrections agencies aren't equipped to collect such data ✘ Standards for measuring whether students continue education post-enrollment do not exist ✘ No causal link between post-enrollment continued education & current education 	<p>New York Department of Corrections and Community Services⁵</p> <p>American Association of Community Colleges⁶</p> <p>Bard Prison Initiative⁷</p>
<p>Job Placement Rates</p>	<ul style="list-style-type: none"> ✘ PEPs are often prohibited from contacting students upon release, making these data difficult to collect. ✘ These rates must factor-in unique barriers formerly incarcerated people face in gaining employment. ✘ There is no framework to determine when a person should find employment related to their education, and educational benefits like critical thinking skills are more important than a specific career path. 	<p>Kansas Department of Corrections⁸</p> <p>American Association for Community Colleges⁹</p> <p>New America¹⁰</p> <p>New York Department of Corrections and Community Services¹¹</p>
<p>Earnings</p>	<ul style="list-style-type: none"> ✘ Students pursue a variety of educational pathways with different earning opportunities. ✘ Parole requirements may force students to take a job regardless of wages. ✘ Student earnings should be measured in comparison to other formerly incarcerated people rather than the general public to account for hiring discrimination. ✘ Neither institutions of higher education nor corrections agencies have the infrastructure to track earnings. ✘ ED has a poor track record of tracking earnings and has no clear plan for either collecting earnings data or comparing said data for incarcerated and non-incarcerated students. 	<p>New Jersey-Scholarship and Transformative Education in Prison¹²</p> <p>State University of New York System¹³</p> <p>American Association of Community Colleges¹⁴</p> <p>Education Trust¹⁵</p> <p>Hope Western Prison Education Program¹⁶</p> <p>Minnesota Office of Higher Education¹⁷</p> <p>New York Department of Corrections and Community Services¹⁸</p>

ED Proposed Metric	Criticism of Proposed Metric	Public Commenters Criticizing Proposed Metric
Instructor Turnover	<ul style="list-style-type: none"> ✘ This is an irrelevant metric in the context of higher education, both because students should experience coursework with a variety of instructors and because it is difficult to measure in a consortium model where instructors from multiple institutions participate. 	<p>Ashland University¹⁹</p> <p>Illinois Coalition for Higher Education in Prison²⁰</p> <p>New York Consortium for Higher Education in Prison²¹</p> <p>State University of New York System²²</p> <p>Bard Prison Initiative²³</p> <p>American Association of Community Colleges²⁴</p> <p>Hudson Link for Higher Education in Prison²⁵</p>
Recidivism	<ul style="list-style-type: none"> ✘ Recidivism is a criminal justice measure and not a valid higher education metric. ✘ Fostering social capital and community building are equally important. 	<p>American Association of Community Colleges²⁶</p> <p>Goodwill Industries International, Inc.²⁷</p> <p>Maricopa Community College²⁸</p> <p>U.S. House²⁹</p> <p>U.S. Senate³⁰</p> <p>Villanova University Program at State Correctional Institution Phoenix³¹</p> <p>Bard Prison Initiative, Education Trust³²</p> <p>Iowa Consortium for Higher Education in Prison³³</p> <p>Illinois Coalition for Higher Education in Prison³⁴</p> <p>New America³⁵</p> <p>New Jersey Scholarship and Transformative Education in Prison³⁶</p>

Which Additional Best Interest of Students Metrics Have an Evidence Base?

Public commenters suggested additional metrics that better reflect the best interest of students. Indeed, our own research team submitted a public comment urging the ED to elevate the wealth of research and scholarship on High Impact Practices and student engagement in higher education such as faculty and student ratios, contact hours with faculty, meaningful engagement with peers, and ability to engage in undergraduate research. Below, we highlight those metrics suggested by public commenters supported by empirical evidence, including our own recent *Pell Is Not Enough* series.

✓ **Equity**

The Goucher Prison Education Project (GPEP) commented that student demographics within prison education programs should reflect the broader demographics of the penal facility population. We agree and wish to further clarify that corrections officials and college personnel should work together to ensure that:

- The student body in prison education programs reflects the overall population of the prison based on at least the following demographic variables: race, ethnicity, sex, gender, Veteran status, ability, citizenship, and related salient identity markers.³⁷
- There are meaningful opportunities for all interested people to pursue postsecondary education, including those deemed not “college ready” by standardized test scores.
- There are opportunities to take entrance exams and placement tests in students’ first or preferred language.
- There are adequate accommodations provided for applicants with diagnosed or undiagnosed disabilities. There should be clear guidelines and instructions for accessing accommodations for applicants, delineated responsibilities for who is to provide what and when, and a plan for when applicants need accommodations.

✓ **High Impact Practices**

The Goucher Prison Education Project (GPEP), Hudson Link for Higher Education in Prison, and the State University of New York (SUNY) system all commented that prison education programs should be evaluated based on their ability to offer

students in-person interaction with peers and instructors. SUNY and the Coalition for Carceral Access in Literacy and Learning recommended that student access to educational spaces, technology, and research materials should be best interest metrics. Our recent research findings support these metrics.³⁸ Furthermore, our research suggests that staff-to-student ratios should be a major consideration in determining the best interest of students, given the general understaffing of the Second Chance Pell Experiment.³⁹

✓ **Transfer and Articulation**

The State University of New York System commented that programs should be evaluated based on their ability to provide courses necessary for degree completion, while the City University of New York System recommended transferability of credits among institutions as a best interest metric. We agree and further suggest that transferability of credits among regionally accredited institutions is important. Additionally, demonstrated willingness to partner and create pathways for student degree or credential progress and completion should be a factor in deciding whether a program is in the best interest of students.⁴⁰

✓ **Outcomes Measures**

The City University of New York System commented that programs should be evaluated based on their provision of financial aid counseling and literacy to students. We agree, given the fact that our research demonstrates that students often do not understand what a Pell Grant is and the long-term impacts of accessing this form of financial aid (e.g. limited lifetime eligibility).⁴¹

Conclusion

There is already preliminary evidence that oversight entities are adopting best interest metrics beyond the four that ED's final regulations require, based on four sample applications our research team has analyzed. In some instances, corrections agencies are requiring output metrics that ED made optional (especially job placement and earnings). However, two of the four applications inquire as to how prison education programs will ensure racial equity in admissions. Half of the sample applications ask about staff capacity and plans to support students who are not eligible for Pell. Two of the four also require descriptions of program orientation plans, with one including questions about how program leaders will educate students about Pell. There are early signs, then, that at least some oversight entities are developing applications with some of the evidence-based metrics public commenters proposed.

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ENDNOTES

- ¹ Section 484 (t)(1)(B)(iii), p. 647.
- ² Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program. 87 Fed. Reg. 45448 (proposed July 28, 2022).
- ³ In its Notice of Proposed Rulemaking [668.241 (a)(1)(vii)], ED added the words “barring exceptional circumstances surrounding the student’s conviction.” Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program. 87 Fed. Reg. 45449 (proposed July 28, 2022). ED removed this phrase in the final regulations. Office of Postsecondary Education, Department of Education. Pell Grants for Prison Education Programs; Determining the Amount of Federal Education Assistance Funds Received by Institutions of Higher Education (90/10); Change in Ownership and Change in Control, 87 Fed. Reg. 65,459 (Oct.28, 2022) (to be codified at CFR Parts 600, 668, 690).
- ⁴ All of the metrics were optional in the original legislation; it seems to be ED’s choice to make any of them mandatory.
- ⁵ New York State Corrections and Community Supervision. (2022, August 23). Public Comment: ED-2022-OPE-0062-0044. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0062-0044>.
- ⁶ American Association of Community Colleges. (2022, August 26). Public Comment: ED-2022-OPE-0062-0095. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0095>.
- ⁷ Bard Prison Initiative. (2022, August 24). Public Comment: ED-2022-OPE-0062-0032. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0032>.
- ⁸ Kansas Department of Corrections. (2022, August 25). Public Comment: ED-2022-OPE-0062-0045. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0045>.
- ⁹ American Association of Community Colleges. (2022, August 26). Public Comment: ED-2022-OPE-0062-0095. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0095>.
- ¹⁰ New America (2022, August 26). Public Comment: ED-2022-OPE-0062-0109. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0062-0109>
- ¹¹ New York State Corrections and Community Supervision. (2022, August 23). Public Comment: ED-2022-OPE-0062-0044. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0062-0044>.
- ¹² New Jersey Scholarship and Transformative Education in Prisons Consortium. (2022, August 26). Public Comment: ED-2022-OPE-0062-0016. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0062-0016>
- ¹³ State University of New York System (2022, August 26). Public Comment: ED-2022-OPE-0062-0085. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0085>.
- ¹⁴ American Association of Community Colleges. (2022, August 26). Public Comment: ED-2022-OPE-0062-0095. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0095>.
- ¹⁵ Garza, A., Wall, J., Rodriguez, P., Qutab, R., & Freeman, W. (2022, August 19). Public Comment: ED-2022-OPE-0062-0019. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0019>.
- ¹⁶ Hope Western Prison Education Program. (2022, August 25). Public Comment: ED-2022-OPE-0062-0056. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0062-0056>.

- ¹⁷ Minnesota Office of Higher Education. (2022, August 26). Public Comment: ED-2022-OPE-0062-0129. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0062-0129>.
- ¹⁸ New York State Corrections and Community Supervision. (2022, August 23). Public Comment: ED-2022-OPE-0062-0044. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0062-0044>.
- ¹⁹ Ashland University. (2022, August 26). Public Comment: ED-2022-OPE-0062-0122. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0062-0122>.
- ²⁰ Illinois Coalition for Higher Education in Prison. (2022, August 26). Public Comment: ED-2022-OPE-0062-0131. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0062-0131>.
- ²¹ New York Consortium for Higher Education in Prison. (2022, August 18). Public Comment: ED-2022-OPE-0062-0103. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0103>.
- ²² State University of New York System (2022, August 26). Public Comment: ED-2022-OPE-0062-0085. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0085>.
- ²³ Bard Prison Initiative. (2022, August 24). Public Comment: ED-2022-OPE-0062-0032. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0032>.
- ²⁴ American Association of Community Colleges. (2022, August 26). Public Comment: ED-2022-OPE-0062-0095. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0095>.
- ²⁵ Hudson Link for Higher Education in Prison. (2022, August 26). Public Comment: ED-2022-OPE-0062-0100. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0010>.
- ²⁶ Hudson Link for Higher Education in Prison. (2022, August 26). Public Comment: ED-2022-OPE-0062-0100. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0010>.
- ²⁷ Goodwill Industries International, Inc. (2022, August 26). Public Comment: ED-2022-OPE-0062-0082. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0082>.
- ²⁸ Maricopa Community College. (2022, August 26). Public Comment: ED-2022-OPE-0062-0134. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0134>.
- ²⁹ Davis, D. & Lee, B. *Public Comment: 2022-OPE-0062-0091*. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0062-0091>.
- ³⁰ Durbin, R. & Padilla, A. (2022, August 26). Public Comment: ED-2022-OPE-0062-0101. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0101>.
- ³¹ Villanova University Program at State Correctional Institution Phoenix. (2022, August 23). Public Comment: ED-2022-OPE-0062-0061. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0062-0061>.
- ³² Garza, A., Wall, J., Rodriguez, P., Qutab, R., & Freeman, W. (2022, August 19). Public Comment: ED-2022-OPE-0062-0019. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0019>.
- ³³ Iowa Consortium for Higher Education in Prison. (2022, August 25). Public Comment: ED-2022-OPE-0062-0050. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0062-0050>.
- ³⁴ Illinois Coalition for Higher Education in Prison. (2022, August 26). Public Comment: ED-2022-OPE-0062-0131. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0062-0131>.
- ³⁵ New America (2022, August 26). Public Comment: ED-2022-OPE-0062-0109. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0062-0109>.
- ³⁶ New Jersey Scholarship and Transformative Education in Prisons Consortium. (2022, August 26). Public Comment: ED-2022-OPE-0062-0016. Institutional Eligibility, Student Assistance General Provisions, and Federal Pell Grant Program: Docket ID ED-2021-OPE-0062, <https://www.regulations.gov/comment/ED-2022-OPE-0062-0016>.
- ³⁷ See Aguilar Padilla, E., Castro, E. L., & Gaskill, S. (2022, October 1). *Second Chance Pell Recipients at Four Institutions: A Brief Descriptive Analysis*. Salt Lake City, UT: Research Collaborative on Higher Education in Prison, https://cherp.utah.edu/_resources/documents/publications/upep_exploringtheexperiencesofparticipantsinsecondchancepell_brief3.pdf. See also Mangan, K. (2022). How Prison Education Overlooks Women. *Chronicle of Higher Education*, <https://www.chronicle.com/article/how-prison-education-overlooks-women>.
- ³⁸ See Gaskill, S., Castro, E., & Aguilar Padilla, E. (2022, October 1). "Why Am I Paying for This?": Academic Experiences of Incarcerated Students Receiving Second Chance Pell at Four Institutions. Salt Lake City, UT: Research Collaborative on Higher Education in Prison, https://cherp.utah.edu/_resources/documents/publications/upep_brief8.pdf and Gaskill, S., Castro, E. L., & Aguilar Padilla, E. (2022, October 1). "It's Useless, to Put it Politely": Experiences with Technology Among Incarcerated Students Receiving Second Chance Pell at Four Institutions. Salt Lake City, UT: Research Collaborative on Higher Education in Prison, https://cherp.utah.edu/_resources/documents/publications/upep_brief9.pdf.
- ³⁹ Gaskill, S., Castro, E. L., & Aguilar Padilla, E. (2022, October 1). "Pell Doesn't Cover the Whole Thing": Administrators on the Costs of Providing Prison Higher Education. Salt Lake City, UT: Research Collaborative on Higher Education in Prison, https://cherp.utah.edu/_resources/documents/publications/upep_exploringtheexperiencesofparticipantsinsecondchancepell_brief4.pdf.
- ⁴⁰ See student perspectives on their desire for a pathway from an associate to a bachelor's degree in Gaskill, S., Castro, E., & Aguilar Padilla, E. (2022, October 1). "Why Am I Paying for This?": Academic Experiences of Incarcerated Students Receiving Second Chance Pell at Four Institutions. Salt Lake City, UT: Research Collaborative on Higher Education in Prison, https://cherp.utah.edu/_resources/documents/publications/upep_brief8.pdf.
- ⁴¹ Gaskill, S., Castro, E. L., & Aguilar Padilla, E. (2022, October 1). "I Don't Even Know What That Is": Prison Higher Education Student and Alumni Understandings of the Pell Grant Among Four Institutions. Salt Lake City, UT: Research Collaborative on Higher Education in Prison, https://cherp.utah.edu/_resources/documents/publications/upep_brief6.pdf.