Stakeholder Collaboration for Postsecondary Education in Prison

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CONTENTS

Introduction

In 2020, Congress lifted a nearly 30-year ban on people in state and federal prisons receiving Pell Grants—the primary need-based federal postsecondary student aid in the United States. The U.S. Department of Education (ED) regulations have statutory requirements that prison education programs (PEPs) must follow in order for incarcerated students to access Pell Grants.[1] PEPs are defined as eligible programs offered by institutions of higher education and postsecondary vocational institutions that are approved to operate in a correctional setting.[2] ED's regulations implementing this law require the entities that oversee the correctional facilities in which PEPs operate ("oversight entities") to seek input from a variety of stakeholders—such as formerly or currently incarcerated people enrolled in a postsecondary education program or state education agency—to evaluate PEPs and confirm that they are operating in the best interests of the students.

This report describes the benefits of emerging stakeholder engagement strategies and trends in stakeholder collaboration. Further, it serves as a guide to building stakeholder coalitions in the field of postsecondary education in prison. In the past decade, stakeholder collaboration on a statewide level accelerated. Groups formed across the country to achieve higher-quality postsecondary education in prisons, enhance student outcomes, push policy changes, and strengthen relationships in the field within their respective jurisdictions. The Vera Institute of Justice (Vera) conducted a national scan of existing consortia in 50 states, the Federal Bureau of Prisons, and Puerto Rico. From this scan, Vera collected the information presented in this report from 23 consortia through interviews and document reviews conducted in collaboration with its technical assistance partners and other organizations in the field. (For a list of consortia consulted in this report, see the acknowledgments on page 26.)

BENEFITS OF ENGAGING STAKEHOLDERS IN POSTSECONDARY EDUCATION IN PRISONS

A multi-stakeholder strategy is a process in which diverse actors collaborate to achieve a common goal.[3] Having stakeholders work together results in stronger communication and interaction among entities, better policy outcomes, and increased organizational performance.[4] Furthermore, stakeholder collaboration can directly impact idea generation in the field, lead to more resource sharing, and result in higher rates of accountability among stakeholders.[5]

In the field of postsecondary education in prison, stakeholders representing a variety of life and professional experiences bring expertise and resources that are essential to combating challenges such as:

- state financial aid barriers for incarcerated students,
- residency barriers to state funding for education, and
- barriers involving screening for convictions during the college admissions process.

Multiagency groups can weather staff turnover, shifting priorities, and mission drift within corrections departments that can impact students' access to postsecondary education opportunities. Because of this, collaboration among stakeholders is a crucial step to sustain improved outcomes for incarcerated students during and after incarceration.[6]

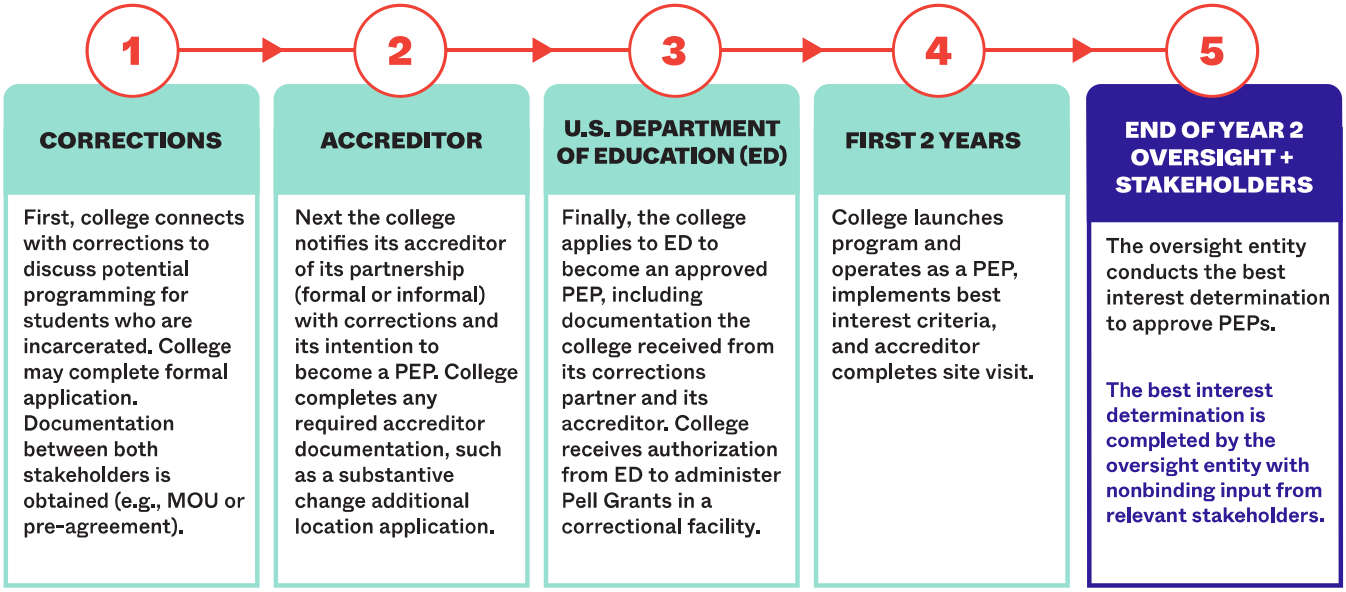
PELL REINSTATEMENT REGULATIONS: REQUIRED STAKEHOLDER FEEDBACK

In 2023, the FAFSA Simplification Act went into effect. The law lifted a nearly 30-year ban on people in state and federal prisons receiving Pell Grants. The law ties Pell eligibility to enrollment in a PEP as defined by ED regulations. These regulations contain

specific requirements for approval, reporting, oversight, and evaluation of PEPs. One requirement is that oversight entities conduct periodic reviews of programs to ensure they are operating in the best interest of students (the "best interest determination"). The regulations outline the criteria to determine best interest.[7] Figure 1 lays out the initial approval and best interest determination, including when the feedback process takes place.

FIGURE 1.

The prison education program (PEP) eligibility process



The inclusion of stakeholders to provide feedback can enhance this evaluation.[8] According to the regulations, the oversight entity must consult three stakeholders in making the best interest determination: (1) representatives of incarcerated people; (2) organizations representing incarcerated people; and (3) state higher education executive offices (SHEEOs).[9] Although initially required, college accrediting agencies may choose not to participate due to conflicts of interest.[10] The oversight entity may consult additional stakeholders at its discretion.

THE IMPORTANCE OF POSTSECONDARY EDUCATION IN PRISON

Research has shown that postsecondary education for incarcerated people has positive effects on those who are incarcerated, their families, their communities, public safety, and facility safety. Education improves self-esteem, self-efficacy, a person's sense of control over events in their life, the ability to cope effectively with change and stress, and resilience against hardship.[11] It also promotes improved physical and mental health.[12] Incarcerated people who participate in postsecondary education programs have 48 percent lower odds of returning to prison than those who do not.[13] This reduction in people returning to prison not only benefits formerly incarcerated students but also saves money—every dollar invested in prison-based education saves more than four dollars in public funds from reduced incarceration costs nationally.[14] Moreover, prisons with postsecondary education programs have fewer violent incidents than prisons that do not, which creates safer working conditions for staff and safer living environments for incarcerated people.[15]

Emerging Trend: Stakeholder Groups for Postsecondary Education in Prison

Many state departments of corrections have already begun convening stakeholders to help them evaluate the quality of PEPs. For this report, Vera defined the following terms to describe two different types of stakeholder groups: consortia and PEP advisory committees.

- **Consortia.** Consortia for PEPs are stakeholder groups typically driven by collaboration, a shared mission to provide quality and equitable education, and a goal of successful reentry opportunities for incarcerated students. These groups vary in structure, formality, and purpose. Consortia are made up of colleges and universities, corrections agencies (federal, state, or local), formerly and currently incarcerated people, nonprofits, and others.

- **PEP advisory committees.** PEP advisory committees exist solely to provide the required nonbinding feedback to oversight entities under the ED regulations. PEP advisory committees may consist of the three required stakeholders—representatives of incarcerated people, organizations representing incarcerated people, and SHEEOs—or be more expansive in their membership.[16]

Consortia are structured in various ways depending on their purpose, and each consortium exists at various levels of formality from casual (for example, holding occasional meetings among interested parties) to formal (for example, developing constitutions or other forming documents, collecting dues, electing officers, and forming committees). In contrast, PEP advisory committees—entities with a more limited scope or mandate—have the best interest determination as their sole mission. This report will focus on consortia, which serve a broader function than PEP advisory

committees. PEP advisory committees, however, may benefit from the lessons learned from consortia as they seek to establish and maintain successful and efficient stakeholder engagement.

WHAT DOES A CONSORTIUM DO?

The function of consortia will vary based on the needs and resources in the jurisdiction. Consortia that Vera spoke with have worked on a number of projects and topics. Some of their tasks and goals are to:

- **Conduct the best interest determination.** Existing or new consortia help state departments of corrections meet the stakeholder feedback requirement in the ED regulations. In these cases, participating in the best interest determination is a subfunction of the consortium.
- **Develop education pathways across jurisdictions.** Consortia members develop a strategy to create education pathways across prisons in the jurisdiction by coordinating credential and course offerings, eliminating competition, and maximizing education opportunities for incarcerated students.
- **Provide student supports.** Consortia members share the responsibility to provide student services such as tutoring, academic advising, and career advising by, for example, hiring academic and reentry navigators and equipping them to advise students in prison about current and future opportunities while incarcerated and during reentry.
- **Coordinate resources.** Consortia members identify and coordinate the necessary resources to support PEP implementation. This may take the form of sharing information among members on topics such as best practices, training, and syllabi or seeking funding to support joint initiatives or other needs.
- **Enhance communication.** Consortia members share information, progress, news, and new and recurring challenges, and they problem-solve emerging issues.

This may be most effective when corrections staff are members or participants to not only provide insight as to what is happening on the ground in facilities, but also to communicate information back to the students.

- **Share data and track outcomes.** Consortia members collaborate on setting goals, executing program evaluations, and tracking data. This can include gap analyses of key performance indicators in such areas as student success, academic quality, civic engagement, and soft-skill development.

- **Advance the use of technology.** Consortia members set goals for technology and pilot strategies to acquire appropriate devices and software and implement policies. Shared technology solutions have the potential to ease the path for students who enroll in multiple programs throughout their sentences and decrease the burden on corrections agencies to monitor technology use.

- **Cultivate partnerships.** Consortia members conduct outreach to new postsecondary institutions, government agencies, organizations with an interest in postsecondary education in prisons, or other relevant entities. For example, engaging nonprofits that provide reentry supports or connecting with community corrections agencies may ease the immediate challenges of reentry and continued enrollment. Similarly, connecting with local employers can raise awareness of skills and talent among formerly incarcerated people and create opportunities for internships, work release, or interviews prerelease.

- **Engage in advocacy and strategic direction.** Consortia members seek to lift internal and external barriers to student success or the implementation of postsecondary education by leveraging resources to advocate for national, state, and local policy change. For example, a consortium may advocate to overturn laws or policies that bar incarcerated people from receiving state financial aid or make recommendations to streamline corrections operational policies.

Creating and Operating a Stakeholder Group

SELECTING A GROUP COORDINATOR

A coordinator typically plays the role of the convener of the group. The coordinator helps set a clear purpose for the group, identify stakeholders, send invitations to stakeholders, coordinate communication among stakeholders, and guide the group in setting goals and objectives.[17] Depending on the structure of the group (see "Choosing a structure" on page 15), the coordinator could be an intended member of the group or a neutral third party whose sole responsibility is to form the stakeholder group.[18] Among consortia Vera spoke with, some examples of chosen coordinators include:

- a professor or college administrator acting independently or representing the institution, as is the case in the Oregon Coalition for Higher Education in Prison;
- a state department of corrections, as occurred in the Maryland Advisory Committee for Prison Education Programs;
- a group of stakeholders created by legislation chaired by two legislators and coordinated by the state higher education executive office, as happened with the Utah Higher Education and Corrections Council; or
- an independent consultant, as was chosen by the Kansas Consortium for Correction Higher Education and the Michigan Consortium for Higher Education in Prison.

DEVELOPING THE CONCEPT FOR AND PURPOSE OF THE STAKEHOLDER GROUP

For jurisdictions interested in developing a consortium, the first step is to identify the group's purpose and function. The coordinator will identify both broad and narrow opportunities and projects for the group to address and identify challenges that may arise. At this stage, the coordinator can lay the foundation for building a stakeholder group by engaging in preliminary research to assess the needs of incarcerated students, the nature of postsecondary education programs in prison in the jurisdiction, and the needs of each stakeholder in order to decide which type of group to form (consortia, advisory committee, etc.) and what the group's purpose will be (to conduct the best interest determination or something broader).[19] Lastly, the coordinator should check whether any other groups or collaborative efforts are taking place in the jurisdiction. A group of stakeholders may be engaged in similar work and such information may help frame the purpose of a new group or result in the expansion of an existing effort.[20]

IDENTIFYING AND ENGAGING MEMBERS

Successful stakeholder groups create a cohesive group dynamic among people with different backgrounds and expertise.[21] Each stakeholder should provide expertise that is necessary to implement PEPs and unique to the jurisdiction's goals and needs. Figure 2 contains a list of common stakeholders that make up consortia, including the three required stakeholders under ED's regulations.

FIGURE 2

Stakeholder roles

STAKEHOLDER	ROLE IN STAKEHOLDER GROUP	STATE EXAMPLES
***Incarcerated people (former and current):** Formerly and currently incarcerated people who are currently or were previously enrolled in a postsecondary education program operating inside a federal, state, or local correctional facility.	Provide insights from a firsthand lived experience, bringing a perspective on potential problems and solutions uniquely through the lens of a person who has been directly impacted. Advocate for the needs of students during incarceration and post-release.	The Michigan Consortium for Higher Education in Prison (MiCHEP) requires two currently incarcerated students as member stakeholders with one student representing the men's facilities and one representing the women's facilities, and reserves a seat on the steering committee for a formerly incarcerated college graduate. One of MiCHEP's currently incarcerated student members is engaged in a Student Voice Councils (SVCs).[22] SVCs are spaces for students to be heard and included when developing strategic plans, designing programs, and revising policies related to prison education programs.[23]
***Organizations representing incarcerated people:** Organizations that provide direct services to currently or formerly incarcerated people or advocate for issues on their behalf.	Provide successful reentry services to incarcerated students. Act as a voice for incarcerated students.	The North Carolina Prison Education Consortium includes the Formerly Incarcerated College Graduate's Network as a member, which is a national organization headquartered in North Carolina that helps to empower formerly incarcerated students.[24]
***State higher education executive offices (state education agencies):** A government agency or department within each U.S. state or territory that is responsible for education, including providing schools and residents with information, resources, and support on educational matters.	Act as the voice for institutions of higher learning, grant licenses to colleges and universities to operate in their states, and provide support for data and reporting. Advocate at the state and federal levels for issues pertaining to postsecondary education. Ensure accessible and equitable state higher education policy and practice.	The Iowa Department of Education is a key stakeholder in the Iowa Consortium for Higher Education in Prison (ICHEP). ICHEP is funded by an Ascendium grant, and the Iowa Department of Education holds and manages the grant but does not chair or lead the consortium.[25]
College accrediting agencies: Private educational associations that develop evaluation criteria and conduct peer evaluations to assess whether those criteria are met.	Ensure quality compliance through standard accreditation process for institutions of higher learning. Provide insight into the accreditation process for prison education programs.	The Middle States Commission of Higher Education President or designee sits on the Maryland Advisory Committee on Prison Education Programs and attends quarterly meetings where they provide non-binding feedback related to their expertise on accreditation of PEPs.
Departments of corrections (state or federal): A governmental agency tasked with overseeing the incarceration of people convicted of crimes within a jurisdiction.	Provide insight into corrections policies and the learning environment in facilities (e.g., technology, classroom space). Increase professional development for corrections staff. Improve facility safety.[26] Strengthen communication between departments of corrections and institutions of higher learning.	The Kansas Department of Corrections leads the Kansas Consortium for Correctional Higher Education. The consortium consults with the Kansas Department of Corrections as a policy advisement board to coordinate higher education programs in the state.[27]

Institutions of higher learning: [28] A college, university, technical or business school, or similar institution offering postsecondary-level academic instruction that leads to a certificate or degree.	Create opportunities for incarcerated students during and after incarceration. Increase professional development for faculty. Increase student enrollment rates. Increase completion rates and other measures of student success. Share best practices with other institutions of higher learning.	The Mississippi Consortium for Higher Education in Prison has as members multiple representatives from all the two- and four-year institutions providing postsecondary education in Mississippi prisons with support from the Mississippi Community College Board and the Mississippi Institutions of Higher Learning.[29]
Community-based organizations: Nonprofit organizations that are representative of a community and have demonstrated expertise in postsecondary education, corrections, reentry, or the issues facing currently and formerly incarcerated people.	Provide additional reentry supports and input regarding community needs. Maintain community connections. Produce research and data on outcomes for educational, employment, and reentry needs of students.	The Illinois Coalition for Higher Education in Prison involves community-based organizations as consortium members.[30]
State departments of labor/workforce development boards: State departments of labor enforce labor laws and administer unemployment benefits, monitor employment and career trends, communicate with businesses, and track wages. Workforce development boards are groups of community leaders that identify the needs of the local job market, oversee career centers, and align workforce development initiatives.	Support economic expansion, develop talent among incarcerated students to set them up for success, and provide employment and earnings information for graduates. May facilitate communication among employers, students, and reentry staff at either institutions of higher learning or corrections departments to help incarcerated people find employment.	As part of Maryland's Advisory Committee on Prison Education Programs, the Maryland Department of Labor (MD Labor) is represented on the committee as the providers and experts on correctional education, specifically Adult Basic Education, General Education Development, and Career Technical Education. Also, the Maryland Longitudinal Data Systems (MLDS) is represented on the committee and provides income and wage data to help improve student and workforce outcomes. Both MD Labor and MLDS work in partnership and MLDS provides MD Labor with wage and income data.[31]
State legislators: State legislatures make laws and approve or rewrite the state's budget as recommended by the governor.	Bring the perspective of lawmakers to help identify solutions that may require legislative or budgetary changes. Invest in postsecondary education. Impact budgeting, safety, community investment, and the well-being and success of students and constituents. Gain a better understanding of the issues that impact incarcerated learners. Build relationships with key constituents.	HB 226 (2022) created the Utah Higher Education and Corrections Council to coordinate, facilitate, support, and deliver postsecondary education in Utah prisons.[32] The council is cochaired by a state representative and a state senator.[33]

** Required stakeholder under U.S. Department of Education's regulations. See 34 C.F.R. § 668.235.*

This is not an exhaustive list of member stakeholders, and members should frequently reassess potentially missing partners. Consortia and PEP advisory committees may also include the following stakeholders:

- college system offices;
- boards;
- commissions;
- associations;
- departments at the state level that oversee, coordinate, or otherwise represent community colleges;
- industry associations; and
- employers who have demonstrated a commitment to hiring incarcerated people.[34]

After identifying the stakeholders for the group, the coordinator's next step is to begin engaging them. The coordinator can garner interest in joining the stakeholder group by leveraging connections and presenting the purpose and concept of the group. Once the stakeholders are identified—and prior to inviting them to a meeting—the coordinator can create an engagement plan that will categorize the stakeholders into primary and secondary stakeholders. Primary stakeholders are those that interact directly with students, like departments of corrections and institutions of higher education. Secondary stakeholders are those with subsidiary connections to and interests in the group's goals, and their work affects the outcomes of students in other ways. It is crucial to involve both primary and secondary stakeholders to maximize the impact of the group's efforts both within the classroom and on a policy level.

CHOOSING A STRUCTURE

The group's structure will inform how the group will operate, what the group will prioritize, and how it will achieve its goals. There are four types of structures:[35]

- **Open structure groups** allow members to join on a voluntary or ad hoc basis. These groups can increase participation, diversity of thought, and expertise.[36] The Massachusetts Prison Education Consortium (MPEC) has an open structure that allows and encourages any entity or person to join. MPEC operates as a resource-sharing network.[37]

- **Closed groups** have a limited number of selected members for a set duration of time, which allows for stronger relationships among stakeholders to work more closely on specialized goals.[38] The Ohio Prison Education Consortium (OPEC) is a closed structure. OPEC has a constitution, a steering committee, and a requirement that every college or university interested in operating a PEP in an Ohio prison must join.[39]

- **Topical subgroups** are made up of subcommittees on issues requiring more detailed and specific attention.[40] The Iowa Consortium for Higher Education in Prison has several smaller working groups within the consortium that focus on specific objectives to push their mission forward. The working groups are funding and partnerships, security and technology, student success, professional development, and data and performance.[41]

- **Multiple-level groups** are a mix of open and closed structures. They consist of a smaller group of selected core members that feeds into a larger network of stakeholders.[42]

The structure of a stakeholder group is not static and often takes on more than one form, and it may change as the group's purpose, mission, and projects evolve.

ESTABLISHING A MISSION AND MEMORIALIZING IT IN GUIDING DOCUMENTS

A stakeholder group's efforts will be stronger if all members jointly develop the mission and goals.[43] This means that the mission should be established after the stakeholders have been invited to the table. The mission should be an extension of the initial concept or purpose on which the group was based and should be of significance for each member independently and the group as a whole. Lastly, the mission serves to further the goals of postsecondary education in prison throughout each jurisdiction.

EXAMPLES OF MISSION STATEMENTS

North Carolina Prison Education Consortium's Mission Statement

"1. To provide a forum for postsecondary higher education institutions offering credit courses who are in partnership through an MOU with the North Carolina Department of Adult Correction (DAC) to advance their and DAC's shared mission of empowering justice-involved individuals as students, professionals, and members of their communities...

2. To be a point of contact for groups and institutions interested in becoming an educational partner with DAC...

3. To support people under Community Corrections' Supervision who began degree programs while incarcerated to continue their education after their supervision and complete degrees and maintain a database of graduate [incarcerated people] to track their reentry progress post-release."[44]

Oregon Coalition for Higher Education in Prison's Mission Statement

"OCHEP exists to:

- Serve as a policy advisory board
- Share information and best practices
- Support practices in the best interest of students
- Advocate for policy and legislative initiatives that support incarcerated and formerly incarcerated students."[45]

As the group establishes the mission, members may solidify agreements in writing to govern their working relationships, such as contracts, bylaws, constitutions, or MOUs. Such written agreements may include provisions such as:

- **Common goals.** This section may provide the purpose of the consortium, overall expectations of the consortium, and the mission statement.
- **Common standards and recommended practices.** This section should include program guidelines and expectations for operating a program inside a facility; faculty and staff expectations for teaching in the prisons; expectations and guidelines around facility security; and student handbook information regarding regulations and standards for incarcerated students, as well as Americans with Disabilities Act compliance, education attendance policies, and the resources needed for education in prisons (e.g., technology, library services, classroom and office space, books, and supplies).
- **Governance and meeting structure.** This section may contain a list of memberships and how they will be selected, voting terms for officers, election guidelines, voting requirements, how the structure of the group will be formed

and a possible list of working groups or committees, and procedures on how to amend the written agreement.

- **Funding and membership dues.** If relevant, the document may contain details about membership dues and how funding might be distributed and used for the group.

Many groups Vera spoke with had opted for constitutions, which are easier to amend and can cover a wider variety of topics than other types of governing documents.[46] The Kansas Consortium for Corrections Higher Education (KCCHE) uses a constitution as its guiding document. KCCHE's constitution contains information on the philosophy of its consortium, defines the purpose of the group, lays out common goals, determines the governance of meetings, and outlines the group's structure. The constitution further defines roles in the group such as the officers of the steering committee and the responsibility of the program review committee. Lastly, KCCHE's constitution provides procedures to amend the document and the timeline for doing so.[47]

Ensuring the Stakeholder Group is Sustainable

Ensuring membership cohesion, adopting best practices, and creating a financial foundation all help to sustain a stakeholder group.

DEVELOPING COHESION

All stakeholders should be given space to provide feedback and be heard. Competing interests between stakeholders are a deterrent to forming and sustaining groups. Such conflicts should not discourage the group from collaborating with various stakeholders, but instead fuel the need for membership support and cohesion among all stakeholders.[48]

One way to overcome the challenge of inevitable competing interests among stakeholders is for groups to be led by or include currently and formerly incarcerated people from their inception. Incarcerated people are the population directly impacted by the group's work. In addition to their lived experience and expertise, incarcerated people serve as a direct voice representing the population the group is working for, which should foster deeper collaboration and eliminate competition. Despite this, many consortia were formed without the participation of incarcerated or formerly incarcerated students or graduates. Even though this is a priority for many consortia, logistics and lack of connections to formerly incarcerated people present challenges to their engagement.

For example, the Tennessee Prison College Coalition (TPCC) was founded with students as a primary stakeholder within the group. TPCC, under the umbrella of the Tennessee Higher Education Initiative (THEI), is a consortium made up of the Tennessee Board of Regents, Tennessee Department of Corrections (TN DOC), Tennessee Department of Labor, Tennessee Higher Education

Commission, THEI, and alumni of prison education programs operating within the TN DOC, who are also known as TPCC's subject-matter experts because their lived experience is invaluable to TPCC's work. Centering alumni in the consortium has helped the group to prioritize students, lead conversations with humanizing language, and encourage the alumni to guide deliberation.[49]

ACQUIRING FUNDING

Members may seek funding to support the efforts of consortia. Although funding is not required to form a stakeholder group, funding can support sustainability, increase reach and impact, and incentivize stakeholders to participate. Some consortia secure funding by requiring members to pay dues, while others seek funding from philanthropic, federal, and other sources.

The Mississippi Humanities Council received funding from the Andrew W. Mellon Foundation, to expand its support of humanities courses in Mississippi prisons. This funding allowed MCHEP to hire full-time staff members, develop a webpage with centralized resources for stakeholders, and host national conferences on prison education.[50]

Conclusion

The benefits of stakeholder collaboration are vast. This collaboration establishes stronger education and reentry goals within the jurisdiction, increases resources among stakeholders, improves communication and data sharing among stakeholders, and unifies practices among prison education programs and the entities helping to implement such programs. Stakeholder groups provide a foundation built on a common vision and mission, with substantive goals that are achievable and structures for the work to thrive and the stakeholders to collaborate effectively. To ensure sustainable models, shared purposes and common goals should ground the stakeholders in their collaboration around implementing high-quality prison education programs in prisons. As seen through ED's requirement of stakeholder feedback in the PEP process and existing consortia around the country, tapping into the expertise of various stakeholders is a crucial element to ensure and implement high-quality education practices for incarcerated students, and this critically important practice should be at the forefront in the expansion of postsecondary education in prison.

ENDNOTES

1 Myra Hyder, *Accessing Pell Grants for College Programs in Corrections Settings: A Summary of the Regulations and Requirements* (New York: Vera Institute of Justice, 2023), 1, https://www.vera.org/publications/accessing-pell-grants-for-college-programs-in-correctional-settings.

2 34 C.F.R. § 668.236, 87 Fed. Reg. 65426, 65495 (October 28, 2022), https://perma.cc/VGX2-MUMX.

3 Food and Agriculture Organization of the United Nations, "Facilitating Effective Multi-Stakeholder Processes," accessed November 22, 2023, https://perma.cc/K3NF-W4AP.

4 Thaddieus W. Conner, "Exploring the Diverse Effects of Stakeholder Engagement on Organizational Performance," *American Review of Public Administration* 47, no. 6 (2017), 634–647, https://doi.org/10.1177/0275074015618785.

5 Ibid.

6 RMC Research Corporation, *Sustaining Reading First—Engaging Stakeholders: Including Parents and the Community to Sustained Reading Outcomes* (Arlington, VA: RMC Research Corporation, 2009), 5, https://perma.cc/PSX5-EEN7.

7 Consolidated Appropriations Act of 2021, Pub. Law 116-260 (December 27, 2020), DIVISION FF – Other Matters, Title VII – FAFSA Simplification, Sect. 483, 134 STAT. 3183, Free Application for Federal Student Aid, https://perma.cc/FLQ6-UTEE.

8 Paul R. Brandon and Landry L. Fukunaga, "The State of the Empirical Research Literature on Stakeholder Involvement in Program Evaluation," *American Journal of Evaluation* 35, no. 1 (2013), 26–44, 40, https://doi.org/10.1177/1098214013503699.

9 34 C.F.R. § 668.235. Oversight entities may include relevant stakeholders—or stakeholder groups—during the earlier stages of the pre-process, which allows for all stakeholders to become familiar with one another and prepare for the best interest determination at the end of year two. Moreover, the oversight entity is tasked with developing an approach to evaluating the best interest determination. Although not required, some oversight entities are including stakeholders at this stage as well. This allows for stakeholders to provide insight based on their knowledge and expertise into the kinds of data that would best capture the performance of the PEP and what benchmarks or thresholds, if any, might be relevant to set. For example, formerly incarcerated people will have insight into the quality of reentry services and how to measure them, while the department of labor or other industry groups will have knowledge of in-demand industries or career opportunities for formerly incarcerated people and the merits of evaluating PEPs against the metrics commonly used in their fields.

10 Accrediting agencies are not required to join a PEP advisory committee if they believe a conflict of interest would arise. U.S. Department of Education, Federal Student Aid, *Prison Education Fact Sheet on Accreditation Requirements* (Washington, DC: U.S. Department of Education, 2023), https://perma.cc/A4CK-EFXS.

11 See Julie Arsandaux, Cédric Galéra, and Réda Salamon, "The Association of Self-Esteem and Psychosocial Outcomes in Young Adults: A 10-Year Prospective Study," *Child and Adolescent Mental Health* 26, no. 2 (2021), 106–113, 108, https://doi.org/10.1111/camh.12392; Cathie Hammond, "Impacts of Lifelong Learning upon Emotional Resilience, Psychological and Mental Health," *Oxford Review*

of Education 30, no. 4 (2004), 551–568, https://www.jstor.org/stable/4127165; and Prisoner Reentry Institute, *Mapping the Landscape of Higher Education in New York State Prisons* (New York: John Jay College of Criminal Justice, Prisoner Reentry Institute, 2019), 41, https://perma.cc/LQU4-S3Q3.

12 Arsandaux, Galéra, and Salamon, "The Association of Self-Esteem and Psychosocial Outcomes in Young Adults," 2021, 108; and Hammond, "Impacts of Lifelong Learning," 2004.

13 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 (2018), 389–428, 403–404, https://doi.org/10.1007/s11292-018-9334-6.

14 Lois Davis, Robert Bozick, Jennifer Steele, et al., *Evaluating the Effectiveness of Correctional Education: A Meta-Analysis of Programs that Provide Education to Incarcerated Adults* (Santa Monica, CA: RAND Corporation, 2013), xviii–xix, https://perma.cc/YU2J-FA6F.

15 Amanda Pompoco, John Wooldredge, Melissa Lugo, et al., "Reducing Inmate Misconduct and Prison Returns with Facility Education Programs," *Criminology and Public Policy* 16, no. 2 (2017), 515–547, 541, https://onlinelibrary.wiley.com/doi/abs/10.1111/1745-9133.12290.

16 34 C.F.R. § 668.235 ("Advisory committee is a group established by the oversight entity that provides nonbinding feedback to the oversight entity regarding the approval and operation of a prison education program within the oversight entity's jurisdiction."); and U.S. Department of Education, Federal Student Aid, "Prison Education Programs," accessed February 5, 2024, https://perma.cc/5VRY-LCS5. Oversight entities are engaging with existing consortia to develop the approach to and conduct the best interest determination. Working with an existing consortium enables oversight entities to engage stakeholders that are already committed to advancing postsecondary education in prison and have a deep knowledge of higher education policy and practice, common challenges and opportunities, and the local landscape of incarceration and reentry. Also, oversight entities are developing PEP advisory committees specifically for the purpose of conducting the best interest determination. Oversight entities are also engaging these committees to assist with other stages of the PEP approval process and are not limited to the three required stakeholders listed in the regulations. Lastly, some oversight entities are choosing to develop PEP advisory committees with the required stakeholders while a separate consortium with broader functions is concurrently being formed or already exists in the jurisdiction. In jurisdictions where both a consortium and PEP advisory committee coexist, all relevant stakeholders, including oversight entities, are considering how the two groups will collaborate and operate around the best interest determination. Other strategies for complying with this requirement are likely to emerge as implementation continues.

17 URBACT, *URBACT Guidance: Setting Up and Running a Multi-Stakeholder Group* (European Union: URBACT, 2019), 13, https://perma.cc/7JRS-UD4Z; and Terri Bergman and National Alliance of Business, *Approaches to Forming a Learning Consortium* (Washington, DC: ERIC Clearinghouse, 1995), 15, https://archive.org/details/ERIC_ED391048/page/n1/mode/2up.

18 Bergman and National Alliance of Business, *Approaches to Forming a Learning Consortium*, 1995, 12.

19 Ibid., 2; and Susanne Hollmann, Babette Regierer, Jaele Bechis, et al., "Ten Simple Rules on How to Develop a Stakeholder Engagement Plan," *PLOS Computational Biology* 18, no. 10 (2022), e1010520, https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9560496/.

20 URBACT, *URBACT Guidance*, 2019, 6.

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