



MN DOC PEP APPLICATION DOCUMENTS

Thank you for your interest in offering a PEP (Prison Education Program) within the Minnesota Department of Corrections (DOC). This document includes:

[MN DOC Supporting Information for Institutions: PEP Application and Approval Process](#)

[MN DOC PEP Application](#)

Please carefully review the Supporting Information for Institutions before completing the application.

MN DOC SUPPORTING INFORMATION FOR INSTITUTIONS: PEP Application and Approval Process

On July 1, 2023, full reinstatement of federal Pell Grants for incarcerated students went into effect. Following more than a quarter century of ineligibility, incarcerated students are again eligible to receive Pell Grants, the nation's primary source of financial assistance for undergraduate students with the greatest financial need. This date began a new era in higher education in prisons in which colleges interested in offering programming to students who are incarcerated must apply to the US Department of Education (ED) to become an approved Prison Education Program (PEP) provider.

The purpose of this *Supporting Information for Institutions* is to briefly summarize key aspects of the regulations in order to assist postsecondary institutions in their understanding and completion of the *MN DOC PEP Application*.

Full information regarding PEP requirements can be found in the federal guidance on Pell Grants for Prison Education Programs and supersedes information here. These regulations pertain only to programs for which it is expected that incarcerated students will obtain financial assistance through Pell Grants. Note also that, according to federal regulations, only public and private nonprofit postsecondary institutions are eligible to apply for PEP approval. Links to the regulations and other resources can be found under Additional Resources at the end of this section (Page 5).

PEP APPROVAL PROCESS OVERVIEW

Federal regulations outline requirements for postsecondary institutions applying for PEP approval. Institutions must follow a three-step approval process for initial operation of their PEPs:

1. DOC initial approval
2. Accreditor approval
3. US Department of Education (ED) approval

DOC

DOCs (or other entity responsible for overseeing correctional facilities, or the Federal Bureau of Prisons) have been named the “oversight entity” for PEPs. Every PEP must be first approved by the oversight entity, which will permit initial operation of the program for two years. DOC will collect information using the *DOC PEP Application* to help determine Initial PEP Approval. After two years, DOC must assess that each PEP is operating in the “best interest” of their incarcerated students (see more on this below).

Accreditor

After obtaining Initial Approval from DOC, institutions must seek approval from their accreditor for (at least) the first PEP at each of the first two additional locations offered at correctional facilities. Note that correctional facilities are considered additional locations even if instruction is primarily through distance education or correspondence courses. Accreditors must:

- Evaluate the first additional PEP offered by a new method of delivery.
- Conduct a site visit as soon as practicable but no later than one year after initiating the PEP at the school’s first two additional locations.
- Review and approve the methodology for how the institution, in collaboration with DOC, will make the determination that the PEP meets the same standards as substantially similar programs offered to students who are not incarcerated, and, if approved, include the program in the institution’s accreditation.

ED

After receiving accreditor approval and verification of having entered into an agreement with DOC, the institution will apply to ED for final approval. The PEP Assurances Certification, which the institution and DOC must complete together and sign as part of the institution’s application to ED, can be found [here](#).

INFORMATION REGARDING THE BEST INTEREST DETERMINATION

As an oversight entity, DOC must determine that a PEP is operating in the best interest of students.

A key element of PEP approval is the requirement that approximately two years after Initial Approval, oversight entities must make a determination that the program is operating in the best interest of the students (34 CFR § 668.241). In making this determination, oversight entities must seek input from relevant parties as part of a required feedback process. Relevant parties must include representatives of incarcerated people, organizations representing incarcerated people, State higher education executive offices, and may include accrediting agencies. The input is nonbinding but affords oversight entities the opportunity to hear and consider feedback presented by others with expertise and lived experience in this space.

The best interest determination must include an assessment of the following:

- Whether the experience, credentials, and rates of turnover or departure of instructors for the PEP are substantially similar to other programs at the institution, accounting for the unique geographic and other constraints of prison education programs.
- Whether the transferability of credits for courses available to incarcerated students and the applicability of such credits toward related degree or certificate programs is substantially similar to those at other similar programs at the institution, accounting for the unique geographic and other constraints of prison education programs.
- Whether the PEP's offering of relevant academic and career advising services to participating incarcerated students – while they are incarcerated, in advance of reentry, and upon release – is substantially similar to offerings to students who are not incarcerated and who are enrolled in, and may be prepared to transfer from, the same institution, accounting for the unique geographic and other constraints of prison education programs.
- Whether the institution ensures that all formerly incarcerated students are able to fully transfer their credits and continue their program at any location of the institution that offers a comparable program, including by the same mode of instruction.

Oversight entities may choose to include the assessment of other metrics in making the best interest determination and must inform institutions which measures they will assess prior to the end of the Initial Approval period.

When determining if a PEP is operating in the best interest of students, oversight entities must consider the totality of circumstances. This means that the PEP failing one indicator does not necessarily result in termination of the PEP. Further, if the oversight entity finds that a program is not operating in the best interest of students, it must allow institutions to reapply within a reasonable timeframe. (Note that a definition of “reasonable timeframe” had not been established by ED at the time this document was created.)

ADDITIONAL INFORMATION FOR DOC'S SECOND CHANCE PELL PARTNERS

DOC's Second Chance Pell partner institutions participating in the Revised Experiment have waivers allowing them to continue serving their incarcerated students until June 30, 2026, to avoid interruption to the studies of students currently enrolled and to provide time to seek ED approval of their PEP.

INFORMATION SPECIFIC TO THE *DOC PEP APPLICATION*

The following information refers to specific items appearing on the *DOC PEP Application*.

Key Initial Questions

In addition to the best interest determination requirements outlined in § 668.241 of the federal regulations and above, other regulatory information related to the *DOC PEP Application* is provided below:

Q1. PEP applicants cannot have had an adverse action by an accrediting agency in the five years prior to the date of submission of their PEP application to ED nor any current or pending actions by the State to revoke a license (§ 668.236).

Q2. The PEP must not lead to licensure or employment for a specific job or occupation in Minnesota if the job or occupation typically involves prohibitions for formerly incarcerated people (§ 668.236(a)).

Q3. The PEP must satisfy any applicable educational requirements for licensure or certification examinations needed to practice or obtain employment in these sectors or occupations in MN (§ 668.236(a)).

Elsewhere in the Application

Section 3.2-4. Institutions will need to provide Minnesota-specific labor market data, career pathways, and typical starting wages to support the need for the proposed program. If additional assistance with questions 2-4 is needed, contact your regional labor market analyst by clicking [here](#) for contact information.

Section 3.8. Institutions with approved PEPs risk eligibility if more than 25 percent of their regular enrolled student population is incarcerated. However, schools that have continuously provided programs leading to an associate or bachelor's degree for at least two years can apply to ED for a waiver of this requirement. If ED grants a waiver, they will allow up to 50 percent of the student body to be incarcerated with a five-year review period. Second Chance Pell-Revised Experiment schools that were previously granted a waiver are not required to reapply under the new provision; however, enrollment of incarcerated students will be limited to 50 percent in the first five years (§ 600.7).

Reporting Requirements

The institution must submit all required reports to ED (§ 668.239). Among other required documentation, this includes an agreement with DOC to obtain data on dates of transfer between facilities and release of incarcerated students (§ 668.239(c)), as well as verification that the institution has been approved to operate in a DOC facility (§668.236(a)). DOC will cooperate with the institution in the development of signed agreements following Initial Approval.

CONTACTS FOR QUESTIONS

Questions related to DOC's PEP application process may be sent to post.secondary.education.doc@state.mn.us.

Questions related to PEPs generally (process, application, etc.) may be sent to ED at pep@ed.gov.

Questions related specifically to financial aid (FAFSA, defaulted loans, R2T4, etc.) may be sent to pep@nasfaa.org.

ADDITIONAL RESOURCES

[ED's final regulations on Pell Grants for Prison Education Programs](#)

[Vera Institute of Justice](#)

Vera is a national organization contracted by ED to provide technical assistance to institutions and oversight entities on all things related to Pell Grant reinstatement for incarcerated students.

Vera's associates assigned to assist MN postsecondary institutions are Belinda Wheeler (bwheeler@vera.org) and Erin Lynam (elynam@vera.org).



MN Department of Corrections

PEP Application

Thank you for your interest in applying to offer a PEP (Prison Education Program) within the Minnesota Department of Corrections (DOC). This application is part of the Initial Approval process and is to be completed by all postsecondary institutions seeking to offer or continue to offer educational programming to students in DOC correctional facilities. If your school is applying for more than one program at DOC facilities, submit a separate application for each program proposed.

General Information

Institution name:

Click or tap here to enter text.

Name and title of person completing the application on behalf of the institution:

Click or tap here to enter text.

Contact information for person completing the application:

Click or tap here to enter text.

Proposed degree/credential/licensure program and program length:

Click or tap here to enter text.

Mode of instructional delivery (in person, hybrid, synchronous/asynchronous, etc.):

Click or tap here to enter text.

Accrediting body:

Click or tap here to enter text.

Has the proposed program already been approved by the accreditor?

Click or tap here to enter text.

If known, in which MN correctional facility or facilities is your institution proposing to offer the program?

- | | | | |
|------------------------------------|---------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> Faribault | <input type="checkbox"/> Lino Lakes | <input type="checkbox"/> Moose Lake | <input type="checkbox"/> Oak Park Heights |
| <input type="checkbox"/> Red Wing | <input type="checkbox"/> Rush City | <input type="checkbox"/> Shakopee | <input type="checkbox"/> Stillwater |
| <input type="checkbox"/> St. Cloud | <input type="checkbox"/> Willow River | <input type="checkbox"/> Togo | |

Key Initial Questions The following questions are based on requirements in federal regulations for PEPs.

1. Can your institution affirm that it has not been subject to any adverse action by your accreditor within the last five years of this application? ☐ Yes ☐ No
2. Can your institution affirm that the proposed program credential does not lead to licensure or employment that typically involves barriers for people with convictions? ☐ Yes ☐ No
3. If your program leads to licensure or certification, can your institution affirm that it satisfies educational requirements for licensure or certification in Minnesota? ☐ Yes ☐ No ☐ N/A
4. Can your institution affirm that formerly incarcerated students will be able to fully transfer their credits and continue their program at any location of your institution that offers a comparable program? ☐ Yes ☐ No
5. Can your institution affirm that the credits in the proposed program can transfer to at least one other eligible public or private nonprofit institution in Minnesota? ☐ Yes ☐ No
6. Can your institution affirm in proposing this program its intent to:
 - a. Provide experience, credentials, and rates of turnover of faculty comparable to other programs at your institution? ☐ Yes ☐ No
 - b. Provide academic and career advising to students while incarcerated and in advance of reentry that is similar to the advising offered to students who are not incarcerated? ☐ Yes ☐ No
 - c. Commit to meeting all reporting requirements of the US Department of Education and DOC? ☐ Yes ☐ No



If you responded Yes to all of the Key Initial Questions above, please proceed to the rest of the application. If you responded No to any of the above, please stop here and submit the application now. You will be contacted by DOC for further information or explanation and to discuss next steps.

Carefully consider and respond to the application questions below. In doing so, please ensure that you have fully answered the questions asked and that your responses reflect an understanding of this population of students and are specific to the program proposed.

Section 1: Background and Experience

1. **Provide a brief description of your institution (type, public/private, enrollment, etc.).**

Click or tap here to enter text.

2. **Has your institution ever offered educational programming to justice-involved populations or within corrections before? If yes, explain where, when, and what programs, and why you are interested in continuing to provide educational programming in corrections facilities. If no, why is your institution interested in providing postsecondary programming within DOC?**

Click or tap here to enter text.

3. **Briefly describe any experience your institution and/or program has in the following areas:**

- a. **Distance education**

Click or tap here to enter text.

- b. **Recruiting, retaining, and graduating students of historically marginalized groups**

Click or tap here to enter text.

- c. **Reentry counseling (Please note this is not a requirement.)**

Click or tap here to enter text.

Section 2: Program Director and Staffing Information

1. **If known, provide the name, title, and contact information for the Program Coordinator, Director, or other person with decision-making authority for day-to-day operations of the PEP.**

Click or tap here to enter text.

2. **Provide a brief biography for this person that demonstrates they have the qualifications to implement the proposed program.**

Click or tap here to enter text.

3. **Provide information about the faculty pool you anticipate will be teaching in your PEP.**

- a. **Will you engage currently employed faculty or known adjunct faculty, or will you be recruiting new instructors? Will they teach both in the prison facility and on campus? How will you ensure that you have the faculty needed to sustain the program?**

Click or tap here to enter text.

- b. Describe how your institution will ensure that the experience, credentials, and rates of turnover of faculty are substantially like other programs at the institution, accounting for the unique geographic and other constraints of prison education programs, as required under federal regulations.**

Click or tap here to enter text.

- 4. How does your institution stay informed about current research, trends, and innovations in prison education? What professional development opportunities are available to staff and faculty to enhance their understanding of prison education pedagogy and prison education best practices?**

Click or tap here to enter text.

- 5. If known, what other staff does your institution anticipate utilizing or hiring to administer and deliver the program (advisors, tutors, etc.)?**

Click or tap here to enter text.

- 6. Describe how your institution will provide oversight and support for the program – Which college and/or department is hosting the PEP? What support does the program have from senior administrators? Which other units – registrar, financial aid, etc. – have already been engaged with for this work?**

Click or tap here to enter text.

Section 3: Program Description

- 1. Provide the [Classification of Instructional Program \(CIP\)](#) code, a brief description of the proposed program, as well as program goals and measurable outcomes.**

Click or tap here to enter text.

- 2. Detail the need for the proposed program. Provide any economic or labor market data specific to Minnesota that supports the need for the proposed program including demand rating, median wage, projected openings, and the minimum educational requirements for the occupations the program prepares students to enter. Collect data from the [Occupations in Demand](#) tool.**

Click or tap here to enter text.

- 3. What is 2nd year median hourly wages for the proposed program using the [Graduate Employment Outcomes](#) data tool?**

Click or tap here to enter text.

- 4. Provide specific career(s) or specialization pathway(s) for the program and typical starting wages in Minnesota (25th percentile) using [Occupational Employment and Wage Statistics](#).**

Click or tap here to enter text.

5. **Briefly explain how this program will benefit justice-involved individuals in the State of Minnesota. How will your program connect to the DOC’s mission (“Transforming Lives for a Safer Minnesota”), connect to Minnesota job markets, and enable participants to transition their skills into community settings?**

Click or tap here to enter text.

6. **Attach an outline of required courses and course sequence as Appendix A. How will your institution ensure that courses will be sequentially and regularly offered to maximize students’ ability to complete the program in a reasonable time frame?**

Click or tap here to enter text.

7. **What is the expected amount of time for completion for students in this program? Will the program be year-round (fall, spring, and summer semester)?**

Click or tap here to enter text.

8. **When will your institution be prepared to begin offering this program (semester/year)?**

Click or tap here to enter text.

9. **How many students will you seek to enroll in the first and second year of the program?**

Click or tap here to enter text.

Section 4: Advising and Other Student Support Services

Federal regulations require that academic and career advising services provided to students during their incarceration and in advance of reentry will be substantially similar to services provided to students who are not incarcerated, accounting for the unique geographic and other constraints of prison education programs.

A. Academic Advising

1. **Outline or describe the academic advising services your program will provide to help guide incarcerated students through their higher education experience and to support their persistence toward degree completion. Your answer should speak to the specific needs of incarcerated students.**

Click or tap here to enter text.

2. **How will all students have access to regular, sustained professional contact with a program staff member who knows them personally and whom they can trust, who tracks their progress, and provides individualized support?**

Click or tap here to enter text.

B. Career Advising

1. **Outline or describe the career advising services your program will provide to students during their incarceration and in advance of reentry. Your answer should speak to the specific needs of incarcerated students.**

Click or tap here to enter text.

2. **What time, space, or staff do you anticipate needing to offer these services?**

Click or tap here to enter text.

C. ADA Accommodations

1. **Outline or describe the process by which your program will provide ADA accommodations to students during their incarceration.**

Click or tap here to enter text.

D. Other Student Support Services

1. **List any developmental and/or preparatory classes that your institution proposes to offer to program participants.**

Click or tap here to enter text.

2. **Which of the following support services does your institution propose to offer if practicable with DOC capacity and resources? Check all that apply.**

☐ Student orientation

☐ Onsite tutoring

☐ Writing lab

☐ Study hall

☐ Teaching assistants

☐ Onsite FAFSA completion

☐ Transcript request assistance

☐ Library and/or interlibrary loan

☐ Learning disability support/testing

☐ Student advisory committee

3. **List any other student support services you will provide, if any, that are not listed above.**

Click or tap here to enter text.

E. Academic Reentry Planning and Transferability of Credits

1. **Describe any potential barriers to enrollment or access that might affect formerly incarcerated students' ability to transition from the prison program directly to the campus (e.g., requirement to reapply, restrictions on access to campus facilities, or other implications of prior incarceration or sentencing).**

Click or tap here to enter text.

2. **How will your institution ensure that students, upon reentry, will be able to fully transfer their credits and continue their program at any location of your college that offers a comparable program, including by the same mode of instruction, as required under federal regulations?**

Click or tap here to enter text.

3. **How will your institution ensure that the transferability of credits for courses available to these students and the applicability of such credits toward related degree or certificate programs is substantially similar to those at other similar programs at the institution, as required under federal regulations?**

Click or tap here to enter text.

4. **Will your institution permit students to transfer credits toward a different major?**

☐ Yes ☐ No **If no, why not?**

Click or tap here to enter text.

5. **Which wrap-around services will your institution provide—through the program, institution, and/or community partnership—that will assist students with their reentry and transition to continued study at your institution? Check all that apply.**

- | | |
|--|--|
| <input type="checkbox"/> Housing support services | <input type="checkbox"/> Basic needs supplies |
| <input type="checkbox"/> Transportation support/vouchers | <input type="checkbox"/> Health or wellness support |
| <input type="checkbox"/> Childcare services | <input type="checkbox"/> Dedicated orientation process |
| <input type="checkbox"/> Financial aid counseling | <input type="checkbox"/> Legal support services |
| <input type="checkbox"/> Computer/digital literacy training | <input type="checkbox"/> Apprenticeships or internships |
| <input type="checkbox"/> Job/career readiness | <input type="checkbox"/> Job placement services |
| <input type="checkbox"/> Existing campus community of incarcerated students | <input type="checkbox"/> Dedicated staff to support formerly incarcerated students |
| <input type="checkbox"/> Dedicated campus meeting/study space for formerly incarcerated students | |

6. **List any other reentry support services not listed above. If desired (not required), you may also provide brief additional information about those listed.**

Click or tap here to enter text.

7. **How will you ensure that students are made aware of and receive regular information about reentry support services?**

Click or tap here to enter text.

8. List by name or category at least one eligible public or private nonprofit postsecondary institution in Minnesota that the program's credits can be transferred to, noting whether a clear, articulated transfer agreement is currently in place with the institution.

Click or tap here to enter text.

Section 5: Equipment, and Technology

DOC will provide access to limited information technology infrastructure for program support and delivery. Institutions will be responsible for providing all education materials including but not limited to textbooks, instructor guides, classroom supplies, and instructional software.

1. Describe any technology and software that are essential to the PEP (e.g., a Learning Management System, video-classroom capability, Microsoft Office Suite).

Click or tap here to enter text.

2. Will the program require the use of any specialized equipment? ☐ Yes ☐ No If yes, please describe.

Click or tap here to enter text.

3. Outline any technology resources or infrastructure your institution can provide for instructional purposes.

Click or tap here to enter text.

4. What would be the potential impacts on the program if students, even temporarily, lose access to technology? How would you ensure the program is prepared to pivot to alternative delivery methods?

Click or tap here to enter text.

Section 6: Program Costs and Financial Aid

1. Explain how you will guarantee that the program costs (tuition, fees, books, supplies, etc.) will be covered 100% by Pell Grants and/or institutional grants or scholarships, applicable state grants or scholarships, donations, etc., without financial support from DOC and that there will be no cost to students.

Click or tap here to enter text.

2. Are your current registration and financial aid systems able to record the demographics of students receiving Pell Grants who are incarcerated? ☐ Yes ☐ No If no, how will you track this demographic information?

Click or tap here to enter text.

Section 7: Budget Narrative and Sustainability

1. **Is your institution able to sustain your proposed program, including start-up costs, PEP development, administrative expenses, etc.?** ☐ Yes ☐ No
2. **Describe specific strategies for the sustainability of the program's activities and partnership with the DOC for at least the next five years.**

Click or tap here to enter text.

Section 8: Program Evaluation

1. **How will you solicit regular feedback from students regarding their satisfaction with the PEP?**

Click or tap here to enter text.

2. **How will the PEP define and measure student success?**

Click or tap here to enter text.

3. **Describe how the effectiveness of the PEP will be assessed, including what data will be collected to measure program outcomes.**

Click or tap here to enter text.

Section 9: Additional Information (Optional)

Provide any additional information or details you would like to share that you believe are relevant to your institution's PEP application.

Click or tap here to enter text.

Section 10: Submission and Process Information

By submitting this application, your institution is indicating its interest and intent in offering a PEP within DOC that follows federal regulations, including meeting reporting requirements and operating the program in the best interest of the students. In submitting the application, the institution should understand that, while the application will be evaluated based on the program as proposed, if approved, actual implementation of the program will depend upon DOC capacity, policy, and other factors. The PEP Application Review Process below outlines the actions and timeframe for this review. It is anticipated that the full review process will be 4-8 weeks in duration, depending on if, and to what extent, additional information or communication is requested

DOC PEP APPLICATION PROCESS

Initial Review

- All applications will have an initial review by DOC Education staff for completeness within two weeks from the receipt of the application.
 - If an institution replied “No” to any of the Key Initial Questions on pages one or two of the application, DOC will contact the postsecondary institution to request further information or explanation and to discuss next steps.
 - DOC will notify applicants about requests for clarification or additional information before moving forward with the application evaluation.

Application Evaluation

- All applications will be evaluated by the PEP Review Committee and DOC executive leadership within four to six weeks of the date the application passed Initial Review.
 - Applicants may be contacted by DOC to request additional information, modifications, and/or a meeting to discuss aspects of the proposed PEP with the postsecondary institution.

Notification of Final Decision

- Applicants will be notified by DOC within two business day of their final decision.
 - If the application is approved, DOC will initiate communication with the postsecondary institution to begin discussion of program details, expectations, and next steps.
 - If the application is not approved, the postsecondary institution may submit a new application one year from notification of the final decision.

Submit the DOC PEP Application to post.secondary.education.doc@state.mn.us.

Questions about the PEP application may also be sent to post.secondary.education.doc@state.mn.us