



AACRAO

PRISON EDUCATION: CONSIDERATIONS, GUIDANCE, AND BEST PRACTICES

PRISON EDUCATION
WORKGROUP REPORT
2026

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EXECUTIVE SUMMARY

The American Association of Collegiate Registrars and Admissions Officers (AACRAO), in partnership with the National Association of Student Financial Aid Administrators (NASFAA), established the Prison Education Work Group in 2025 in response to the reinstatement of Pell Grant eligibility for incarcerated learners and the resulting growth of prison education programs (PEP) nationwide.

The work group was charged with examining the administrative, operational, and technical dimensions of PEP implementation through a registrar and enrollment management lens.

Specifically, the group focused on:

- Reviewing and refining administrative resources and institutional practices
- Clarifying FERPA and data privacy considerations in correctional settings
- Supporting institutional readiness, compliance, and audit preparedness
- Identifying shared approaches to data collection, documentation, and reporting
- Encouraging cross-institutional collaboration and peer learning

The considerations, guidance, and best practices presented in this document are written for registrars, admissions officers, and enrollment management professionals. While the successful implementation of PEPs requires collaboration across many institutional and external partners, this guidance centers the systems, processes, and compliance responsibilities most closely aligned with student records and academic administration.

This document outlines best practices across the full lifecycle of PEP administration—from admissions and enrollment through academic progress, records management, and graduation—while addressing the unique constraints of correctional environments.

Key areas include:

- Administrative infrastructure and cross-departmental/correctional facility coordination
- Data management, student information systems (SIS), and privacy protections
- Adapted admissions, registration, and academic processes
- Compliance with FERPA, Title IV, accreditation, and residency requirements
- Academic operations, including scheduling, attendance, grading, and standing
- Records management, transcript provision, and graduation processes
- Policy exceptions, appeals, and student support considerations

As institutions continue to expand access to higher education for justice-impacted learners, these guidelines are intended to support consistent, compliant, and student-centered practices. They also serve as a foundation for ongoing field development, recognizing that policies, technologies, and institutional approaches will continue to evolve.

The Prison Education work group was comprised of a core group of AACRAO members representing diverse institutional types, positions, and geographic locations:

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ABOUT ASCENDIUM EDUCATION GROUP

Ascendium Education Group is a 501(c)(3) nonprofit organization committed to helping people reach the education and career goals that matter to them. Ascendium invests in initiatives designed to increase the number of students from low-income backgrounds who complete postsecondary degrees, certificates and workforce training programs, with an emphasis on first-generation students, incarcerated adults, rural community members, students of color and veterans. Ascendium's work identifies, validates and expands best practices to promote large-scale change at the institutional, system and state levels, with the intention of elevating opportunity for all. For more information, visit <https://www.ascendiumphilanthropy.org>

FOUNDATIONAL FRAMEWORKS

General Practices

Registrars administering PEPs should establish foundational practices that ensure program integrity, compliance, and sustainability:

- Document all processes in comprehensive internal standard operating procedures (SOPs) or manuals
- Create dedicated training modules for registrar staff new to PEP administration
- Conduct regular reviews of FERPA and financial aid policies in collaboration with legal counsel or AACRAO FERPA experts
- Implement consistent documentation practices across all PEP processes
- Establish clear delegation of responsibilities within the Registrar's Office for PEP management

Cross-Departmental Collaboration

Successful PEP administration requires robust collaboration across institutional departments:

- Establish formal working relationships with:
 - Admissions (paper processes and credit evaluation)
 - Financial Aid (Title IV compliance)
 - PEP Teams (day-to-day operations)
 - Department of Corrections (DOC) Liaisons (site logistics and access)
 - Bursars, academic advisors, and executive leadership (coordination and support)
- Create clear, documented workflows between departments with defined responsibilities
- Schedule regular update meetings between all stakeholders (monthly recommended)
- Develop shared documentation systems accessible to authorized personnel across departments
- Establish formal escalation procedures for resolving interdepartmental issues
- Create cross-training opportunities between departments to enhance understanding of challenges

Departmental of Corrections Relationship Management

Managing relationships with correctional facilities is critical for program success:

- Develop comprehensive Memoranda of Understanding (MOUs) with correctional facilities that clearly define:
 - Communication protocols
 - Document handling procedures
 - Academic calendar coordination
 - Emergency procedures
 - Data sharing limitations
- Establish regular communication channels with prison officials (designated contacts and frequency)
- Document all policies and procedures agreed upon by both institutions
- Implement structured troubleshooting frameworks for conflict resolution
- Build relationships with key prison staff at multiple levels to facilitate smoother operations
- Create joint training opportunities for college and prison staff to enhance mutual understanding
- Establish protocols for handling facility lockdowns or restrictions that impact academic operations

DATA, SYSTEMS & PRIVACY

Data Element Definition

Implement comprehensive data management strategies:

- Create dedicated cohort codes to identify incarcerated students at point of admission
- Develop comprehensive tagging systems by:
 - Facility location
 - Release status
 - Graduation status
 - Program participation
- Assign specific cohort codes for each correctional facility
- Use campus codes to differentiate prison-based instruction sites
- Create status indicators to track students who are:
 - Active in the program
 - Released from the facility
 - Graduated from the program
- Tag students throughout their entire academic lifecycle from admission through graduation and alumni status
- Collaborate with institutional research and financial aid to align data tracking for compliance and reporting needs

SIS Platform-Specific Approaches:

- Banner: Implement custom cohort codes and campus codes
- PeopleSoft: Utilize service indicators, location codes, and student attributes
- Populi: Implement specific tagging systems within available framework
- Colleague: Create facility-specific buildings and section attributes

Privacy Considerations:

- Ensure codes used in the SIS are not visible on student-facing documents
- Restrict visibility of identifying codes to authorized personnel only
- Design codes that do not explicitly identify incarceration status on transcripts
- Use subplans or attributes that track students without appearing on official documents

FERPA & Privacy

Implement stringent privacy protections and FERPA-compliance practices:

- Create strict FERPA-compliant protocols for data sharing with DOC
- Develop clear data sharing agreements with correctional facilities
- Implement processes for obtaining appropriate FERPA waivers when necessary
- Develop protocols for handling confidential information in paper-based systems
- Document all privacy measures and exceptions
- Design secure communication channels:
 - Establish protocols for handling mail containing confidential information
 - Create processes for secure distribution of academic records
 - Implement safeguards against unauthorized access by correctional officers
- Address power of attorney and family data requests with appropriate caution
- Train staff on privacy-first practices to avoid stigmatization or risk to students
- Partner with institutional legal/compliance teams and AACRAO FERPA experts
- Document all security measures and privacy protocols

Accreditation

Address accreditation requirements specific to PEPs:

- Coordinate with your Accreditation Liaison Officer (ALO) to fulfill substantive change requirements
- Submit comprehensive substantive change applications for prison education programs
- Treat PEPs as both new locations and new programs, regardless of course content overlap
- Document all facility-specific adaptations to meet accreditation standards
- Maintain records of all communications with accreditors regarding PEP operations
- Create systems to demonstrate equivalency between on-campus and PEP instruction

ADMISSIONS & ONBOARDING

Admissions Processes

Adapt admissions processes to accommodate the unique constraints of incarcerated students:

- Implement systems to accept and process paper-based applications
- Establish internal workflows to manually collect prior transcripts with FERPA-compliant processes
- Simplify or waive nonessential requirements that create barriers (e.g., online forms, email verification)
- Design admission policies that reflect PEP eligibility requirements, including:
 - Remote residency considerations
 - Criminal justice interface issues
 - Facility-specific restrictions
- Develop specialized processes for requesting previous transcripts that accommodate limited student access
- Plan strategic data collection points at time of admission to minimize administrative challenges later
- Create clear documentation of all admission exceptions and processes

Residency Status

Address the unique residency challenges for incarcerated students:

- Collaborate with institutional research to determine state-specific residency policies
- Create procedures for handling conflicts between prison location and prior residence
- Develop policies for determining tuition classification based on facility location
- Document all residency determinations and exceptions for compliance
- Establish appeals processes for residency classification
- Create specific residency policies that address facility transfers

Articulation & Credit Assessment

Develop flexible yet consistent credit evaluation practices:

- Implement transparent evaluation policies for:
 - Outdated or difficult-to-access transcripts
 - Prior college credit earned while incarcerated
 - Credits from non-regionally accredited sources or predatory institutions

Articulation & Credit Assessment (cont.)

- Clearly communicate transcript evaluation decisions to academic advisors and PEP staff
- Support manual transcript requests and delivery systems for students without online access
- Create documentation systems to record credit transfer decisions and justifications
- Establish communication channels for explaining credit transfer decisions to students
- Develop appeals processes for transfer credit decisions

ENROLLMENT & ACADEMIC OPERATIONS

Enrollment & Registration Processing

Create specialized registration processes that accommodate prison constraints:

- Establish manual or batch registration processes with direct Registrar Office oversight
- Designate specific staff members responsible for handling paper registration forms
- Create clear protocols defining who has authority to register, drop, or withdraw students
- Develop systems for backdating registrations when necessary due to communication delays
- Implement policies to waive late registration fees when delays are caused by prison logistics

Withdrawal Policies:

- Establish clear procedures for handling student withdrawals, including:
 - Documentation requirements
 - Authority to process withdrawals (student, prison staff, or college representatives)
 - Documentation of withdrawal reasons for compliance and reporting
 - Implications for Return to Title IV calculations
 - Records of all exceptions and authorizations for audit purposes

Academic Calendar

Design flexible academic structures that accommodate prison realities:

- Build flexible academic calendars that accommodate prison schedules and restrictions
- Include buffer days in semester scheduling to absorb potential disruptions
- Develop protocols for handling lockdowns or unexpected facility closures
- Document contact hour adjustments for accreditation compliance
- Address conflicts between prison schedules and traditional academic calendars
- Consider prison-specific holiday schedules and facility restrictions in calendar planning
- Create contingency plans for academic continuity during facility disruptions

Class Scheduling

Implement specialized course scheduling practices:

- Design class sections with distinct codes (e.g., Literature 2000P) to distinguish PEP courses
- Build flexibility into course schedules to accommodate lockdowns and movement restrictions
- Implement "fat semesters" that build in extra time for potential disruptions
- Create scheduling protocols that align with facility movement restrictions
- Develop backup plans for instructor access issues

Attendance Verification

Establish attendance tracking that meets institutional and regulatory requirements:

- Ensure attendance policies align with Department of Corrections needs while complying with Title IV
- Design attendance tracking systems that satisfy both DOC and Title IV requirements
- Create reliable communication channels between instructors and registrar for attendance reporting
- Establish protocols for handling attendance issues and their impact on financial aid eligibility
- Document all attendance policies and exceptions for compliance and audit purposes
- Implement backup verification methods when standard processes are disrupted

Grade Reporting

Address accreditation requirements specific to PEPs:

- Coordinate with your Accreditation Liaison Officer (ALO) to fulfill substantive change requirements
- Submit comprehensive substantive change applications for prison education programs
- Treat PEPs as both new locations and new programs, regardless of course content overlap
- Document all facility-specific adaptations to meet accreditation standards
- Maintain records of all communications with accreditors regarding PEP operations
- Create systems to demonstrate equivalency between on-campus and PEP instruction

Academic Standing

Address accreditation requirements specific to PEPs:

- Coordinate with your Accreditation Liaison Officer (ALO) to fulfill substantive change requirements
- Submit comprehensive substantive change applications for prison education programs
- Treat PEPs as both new locations and new programs, regardless of course content overlap
- Document all facility-specific adaptations to meet accreditation standards
- Maintain records of all communications with accreditors regarding PEP operations
- Create systems to demonstrate equivalency between on-campus and PEP instruction

TRANSCRIPTS & GRADUATION

Transcript Provision

Create secure transcript management processes:

- Establish procedures for manually generating and providing transcripts when needed
- Implement systems for providing hard copy unofficial transcripts directly to students
- Maintain strict FERPA controls when working with third-party transcript providers
- Provide clear instructions for DOC staff and advisors regarding authorized requests
- Establish protocols for verifying transcript requests and maintaining FERPA compliance
- Document policies for handling transcript requests from third parties
- Implement systems to ensure students have appropriate access to their academic records
- Create secure delivery methods for transcripts within facility constraints

Graduation Certification & Audits

Adapt degree completion processes to PEP needs:

- Develop manual systems and procedures for degree auditing
- Design methods to track course substitutions and program requirements manually
- Integrate known course substitutions for inaccessible courses into degree plans
- Create processes to prevent students from taking non-degree contributing courses
- Design methods for communicating graduation requirements to students without access to degree planning tools
- Implement manual degree audit tracking systems
- Create documentation procedures for all substitutions and exceptions

Graduation Planning

Develop protocols for recognizing student achievement within facility constraints:

- Establish procedures for planning prison-based graduation ceremonies
- Collaborate with DOC to secure approval for graduation ceremonies, including:
 - Cap and gown policies
 - Guest attendance
 - Media presence
 - Security protocols
- Ensure official degree conferral processes meet institutional and accreditor standards
- Establish protocols for family attendance at ceremonies, where permitted
- Implement systems for ensuring proper degree conferral documentation within facility restrictions
- Create contingency plans for ceremony disruptions or cancellations

FINANCIAL & ADMINISTRATIVE COORDINATION

Bursar Connection

Create secure transcript management processes:

- Establish procedures for manually generating and providing transcripts when needed
- Implement systems for providing hard copy unofficial transcripts directly to students
- Maintain strict FERPA controls when working with third-party transcript providers
- Provide clear instructions for DOC staff and advisors regarding authorized requests
- Establish protocols for verifying transcript requests and maintaining FERPA compliance
- Document policies for handling transcript requests from third parties
- Implement systems to ensure students have appropriate access to their academic records
- Create secure delivery methods for transcripts within facility constraints

POLICY EXCEPTIONS

Policy Exceptions & Appeals

Develop fair and transparent exception processes:

- Document standard exceptions to institutional policies for PEP students, including:
 - Administrative drops due to transfers between facilities
 - Backdated withdrawals due to communication delays
 - Late submissions for appeals or grade changes
- Design appeals processes that reflect the communication limitations of incarcerated students
- Establish clear procedures for handling substitution requests for degree requirements
- Create protocols for handling academic appeals from students with limited access to institutional resources
- Document all exceptions for audit and compliance purposes
- Establish timelines for appeals that accommodate facility communication constraints
- Create templates for common exception requests to streamline processes

CONCLUSION

PEPs represent an area of significant growth and renewed focus in higher education following the reinstatement of Pell Grant eligibility for incarcerated learners. They create expanded pathways for access, degree attainment, and economic mobility, while also introducing new operational, regulatory, and partnership considerations for institutions.

PEPs require institutions to navigate complex environments that extend beyond traditional campus boundaries. They demand coordinated efforts across institutional offices, correctional facilities, and external partners, along with careful attention to compliance, data privacy, and academic integrity. At the same time, they offer an opportunity for institutions to build more inclusive and adaptable systems that better serve a broader range of learners.

While institutions cannot fully control the external constraints of correctional settings, developing thoughtful, strategic, and consistent approaches to PEP administration is essential. Establishing clear practices for data management, student records, academic processes, and cross-functional collaboration will help ensure programs are sustainable, compliant, and aligned with institutional standards.

Creating shared understanding and alignment around these practices will lay the foundation for more effective and scalable PEP implementation. Such efforts will help ensure that prison education programs are delivered with integrity, that student learning is appropriately documented and recognized, and that these programs are valued as a meaningful component of the broader higher education ecosystem.

RESOURCES

American Association of Collegiate Registrars and Admissions Officers: Protecting Student Privacy in Prison Education: Model Agreement and Consent Language

American Association of Collegiate Registrars and Admissions Officers: SIS Configuration for Prison Education Programs: Implementation Framework and Best Practices

U.S. Department of Education - Federal Student Aid: Prison Education Program Questions & Answers

34 CFR § 668, Subpart P (Prison Education Programs)

National Association of Student Financial Aid Administrators: Prison Education Program Web Center

National Association of Student Financial Aid Administrators: PEP Reference Sheets and Policy Guidance

Vera Institute of Justice: Postsecondary Education in Prison Programs and Accreditation Guidebook

