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To: David Tandberg <DTandberg@sheeo.org>; Paccione, Angie (CO) <angie.paccione@dhe.state.co.us>

Subject: Federal negotiation for Pell/Prison Education Programs

Dear Drs. Paccione and Tandberg, I understand you all will be meeting next week and I wanted to take the opportunity to present some information we believe will be exceedingly helpful and important for your meeting.

First here is a pretty good overview of where the subcommittee has ended their work. It contains a good list of agreed to principles and where there are disagreements. Here is the link to this summary:

<https://www.newamerica.org/education-policy/edcentral/whats-next-for-the-reinstatement-of-pell/>

Secondly, here are key points critically important to Adams State University and to our highly successful Prison College Program.

1. The 25% enrollment threshold is very problematic for a small institution like Adams State. There is no legitimate rationale for this threshold and it has, by the way, been inconsistently enforced. For example, we understand Ashland University has almost 80% of their enrollment coming from incarcerated students. Apparently the former DOE staff provided them with a waiver to this threshold requirement. Absent some solid rationale for the 25% it needs to be removed or at least increased to 50% or so. Also, if a threshold is set it needs to be evenly enforced.

2. Print based programs must be included. They were not in the 2nd Chance Pell Program without any justification for excluding them from eligibility. I could speak for days why print based programs are highly successful but will save us all from these details at this time. The bottom line is there is no sufficient justification for not allowing print based programs to be eligible. By the way, we hear from colleagues at the Vera institute and from others in the know, there are certain key individuals in leadership positions at DOE who do not like print based programs and are wanting to put barriers against allowing them to be eligible.

3. Only allowing Pell funding at the 50% level is limiting at best. While some money is better than none it only leads to frustration of these students who would normally be eligible for the full Pell amount but cannot because they are incarcerated.

I am happy to provide more details if you think helpful.

I really appreciate your work to represent our higher education community on this important negotiated rulemaking process.

Please have a great weekend and good luck with your meetings next week.

Cheryl D. Lovell, Ph.D.
President