

Higher Education in Texas Prisons

Discussing the Need for Comprehensive
Data Collection and Evaluation in the
Pell Reinstatement Process

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Acronyms

The following table defines the various abbreviations and acronyms used throughout the report.

Abbreviation	Meaning
BID	Best Interest Determinants
BJA	Bureau of Justice Assistance
BJS	Bureau of Justice Statistics
ED	US Department of Education
FAFSA	Free Application for Federal Student Aid
GED	General Education Development
HEIP	Higher Education in Prisons
MOU	Memorandum of Understanding
MSCHEP	Mississippi Consortium for Higher Education in Prison
NCVS	National Crime Victimization Survey
PEP	Prison Education Program
PSER	Postsecondary Education Reimbursement
RPD	Rehabilitation Programs Division
SACSCOC	Southern Association of Colleges and Schools Commission on Colleges
SCP	Second Chance Pell Experimental Sites Initiative
TACC	Texas Association of Community Colleges
TDCJ	Texas Department of Criminal Justice
TDLR	Texas Department of Licensing and Regulation
TEA	Texas Education Agency
THECB	Texas Higher Education Coordinating Board
TSIA	Texas Success Initiative Assessment
TWC	Texas Workforce Commission
WSD	Windham School District

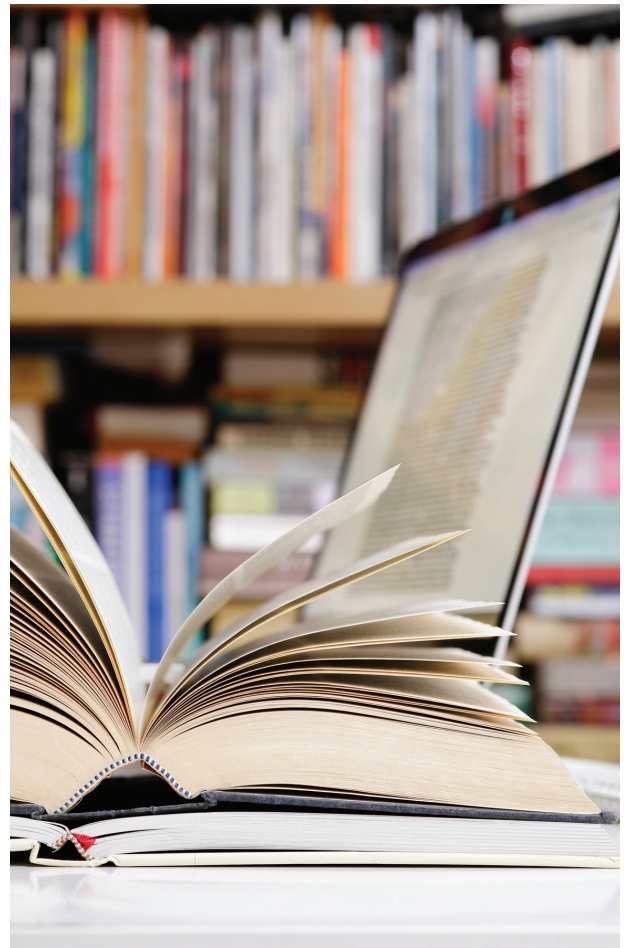
Executive Summary

The reinstatement of Pell Grant eligibility for people in prisons - regardless of sentence length or offense - brings a monumental shift in the opportunity to obtain an education during one's incarceration. This change comes almost three decades after Pell Grant eligibility for incarcerated individuals was rescinded in the Violent Crime Control and Law Enforcement Act of 1994.¹ After the Act was passed, the number of postsecondary education programs in prisons shrank from 772 in the early 1990s to just eight in 1997.² Recognizing the transformative power that education holds, Congress recently reversed course and passed the FAFSA Simplification Act of 2020.³ Today, correctional institutions across the country are now able to launch Pell-funded educational programs as part of their reentry and workforce education efforts.

Advancing educational programming requires buy-in and dedication from actors across the state, particularly from the Texas Department of Criminal Justice Rehabilitation Programs Division (RPD) and the educational institutions providing the programming. For Pell Reinstatement to be sustainable, higher education stakeholders must recognize the importance of and need for consistent data collection and evaluation in building out Prison Education Programs (PEPs). To provide a framework for how this sustainability can come to fruition, this report does the following: (1) explores the transformative benefits of postsecondary education (2) discusses the current higher education in prison (HEIP) landscape in Texas, (3) explains the process of becoming a Pell-funded PEP, and (4) delves into the data points and data collection models that can inform each institutions' PEP evaluation efforts.

Texas Appleseed provides five significant recommendations in this report:

1. ***Robust and intentional data collection*** to adequately measure the efficacy of prison education programming.
2. ***Consistent data evaluation (and reporting)*** to assess program effectiveness and identify areas for process improvement.
3. ***More data sharing agreements*** amongst state agencies to allow for consistent access to relevant workforce, academic, and post-release data.
4. ***Develop a strategic plan for processing PEP requests*** so stakeholders understand one another's roles and responsibilities in the approval and operation of PEP's.
5. ***Develop a robust Best Interest Review process for PEP programs*** so that poorly performing programs can be adjusted or terminated.



Introduction

Postsecondary education is a vital component of the reentry experience for incarcerated individuals, their families, and their communities. By 2030, 62% of all jobs in the state of Texas will require a postsecondary credential,⁴ meaning a vast majority of workers will need more than just a high school diploma to obtain a job. Given that the average educational achievement score of someone confined in TDCJ is equivalent to a 7th-grade education, educational programming is a critical long-term priority.⁵ One portion of the Texas Department of Criminal Justice (TDCJ) 2030 Plan is to have a 95% employment rate for people released from its custody.⁶ “Enhancing education through Pell Grant opportunities” is a key strategy towards this achievement.

To explore the importance of education and the reentry benefits it provides, the U.S. Department of Education (ED) launched the Second Chance Pell Experimental Sites Initiative (SCP) in 2015.⁷ SCP gave incarcerated students the opportunity to participate in postsecondary educational programs using Pell Grant aid. In 2016, the ED invited 67 colleges in 28 states to participate in the Initiative. By 2022, SCP had expanded to include a total of 200 colleges in 48 states, Washington DC, and Puerto Rico.⁸ The success of the Initiative was notable, with more than 40,000 students participating in postsecondary education programs and almost 12,000 students earning educational credentials (e.g., bachelor’s degree, associate’s degree, postsecondary certificates).⁹

Seeing the success of SCP, Congress passed the FAFSA Simplification Act of 2020.¹⁰ From this Act’s passage, incarcerated students are now eligible to receive Pell Grants to finance their education during confinement regardless of sentence length or conviction type.¹¹ This Act marks the first time since 1994 that all incarcerated students will have access to these funds.¹² **The ED believes this change could allow an estimated**

760,000 new students to become eligible for a Pell Grant once institutions have fully developed their PEPs.¹³ In Texas, this avenue to funding one's education could allow over 64,000 individuals currently confined in TDCJ facilities to enroll in a PEP during their stay of incarceration.¹⁴ This change bestows the opportunity for students to expand their intellect, obtain hands-on career training, and engage in prosocial behaviors - all of which are critical components to one's reentry into society.

What does Higher Education in Prison Programming Look Like?

Higher Education in Prison programs provide various credential pathways, with the most common being an Associate's Degree. The majority of HEIP programs are offered by public, two-year institutions, with a bulk of programs located in the Southeastern United States.¹⁵ These programs predominantly utilize on-site, face-to-face, and hybrid modes of engagement, providing access to useful resources like academic libraries and computer labs.¹⁶

The admissions process for HEIP programs varies, with some requiring admission to both the college/university and the program itself, while others solely admit students to the program. In Texas, individuals must meet the criteria for admission to the college or university they would like to enroll in. TDCJ also has criteria that must be met, with all individuals needing to receive security and classification clearance before entry into a program.¹⁷ Of the approximately 130,000 individuals confined in TDCJ,¹⁸ less than 2% are currently enrolled in postsecondary education programs.¹⁹ **Almost 50% of the TDCJ population is eligible for Pell-funded programming.**²⁰

Nationwide, tuition is primarily covered by SCP Pell Grants, foundational grants, Department of Corrections funding, and college scholarships.²¹ In Texas, education can be funded through these means along with self-pay, veteran's benefits (e.g., GI Bill, Hazlewood Exemption),²² and postsecondary education reimbursement (PSER). PSER is TDCJ's loan program for incarcerated students. Eligible students can enroll in courses while incarcerated, but they must reimburse the State for the costs of such education programs.²³

While the ambition and optimism for building out HEIP programming is strong, a multitude of barriers exist for those currently working in the HEIP space. Current barriers include: weak technological infrastructure,²⁴ a shortage of job placement and career services being offered by programs,²⁵ and a general lack of resources and funding to adequately provide programming.²⁶ While these *are* barriers to meeting incarcerated students' needs and maintaining robust education programs, the existing literature overwhelmingly supports postsecondary education as a mechanism to reduce recidivism, increase cognitive skills, and promote the well-being of incarcerated students. To further support this literature and continue emphasizing the need for sustainable HEIP initiatives, this report aims to do the following: (1) explore the transformative benefits of postsecondary education (2) discuss the current higher education in prison (HEIP) landscape in Texas, (3) explain the process of becoming a Pell-funded PEP, and (4) delve into the data points and data collection models that can inform each institutions' PEP evaluation efforts.

The Current State of Postsecondary Education Programming in Texas Prisons

In Texas, numerous educational providers have emerged as leaders in correctional education programming.

Windham School District (WSD) is the largest education provider in TDCJ, present in 99 facility campuses. The District serves approximately 50,000 students on an annual basis across the following realms: academics, life skills, career and technical education, and special education.²⁷ WSD serves as a key pipeline into postsecondary education enrollment for individuals after they obtain a high school diploma or high school equivalency certificate during their stay of incarceration.²⁸ The District conducts many of the academic assessments of students, particularly as part of the intake process at the start of an individual's incarceration.²⁹ These assessments help determine an individual's educational level and are re-assessed throughout the school year to monitor student progress.

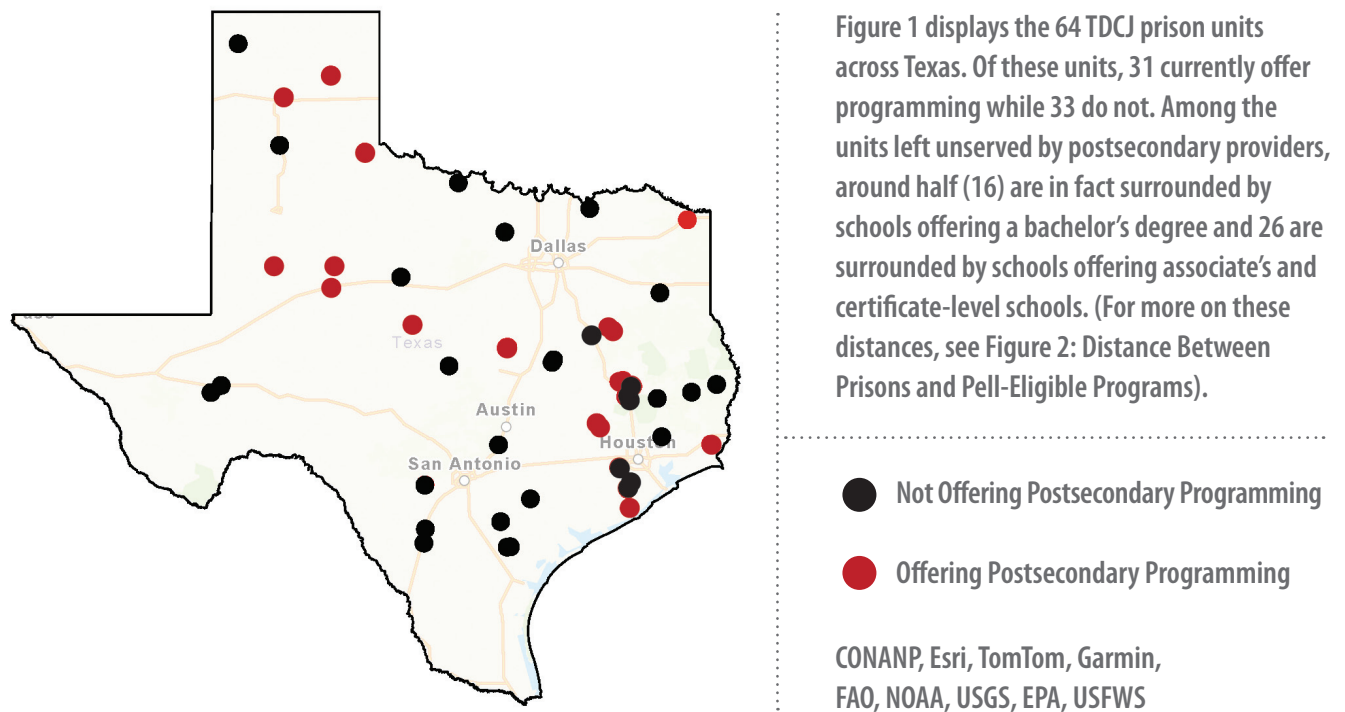
Lee College is the largest postsecondary education provider in TDCJ and the second largest education-in-corrections provider in the country.³⁰ Started in 1966, the program has grown from 182 students in the first year to more than 1,200 students today.³¹ Lee College faculty teach a wide range of academic and technical education courses at the nine TDCJ campuses in which the college operates.³²

University of Houston-Clear Lake's Transforming Lives by Degrees Program is another long-standing HEIP Program in TDCJ.³³ Formed

at the university in 1974, the program has graduated over 600 students to date, and it has expanded its services to three TDCJ units. The university currently offers two bachelor's degree programs and one master's degree program.

While we see consistent efforts by these institutions and other educational providers in the Texas HEIP space, many units in Texas still struggle to provide programming to prospective and current students (see Figure 1). As of April 5, 2024, there are currently 1,584 men and 291 women enrolled in postsecondary education programming across TDCJ's campuses.³⁴

Figure 1: Map of Prison Units Offering / Not Offering Postsecondary Education Programming

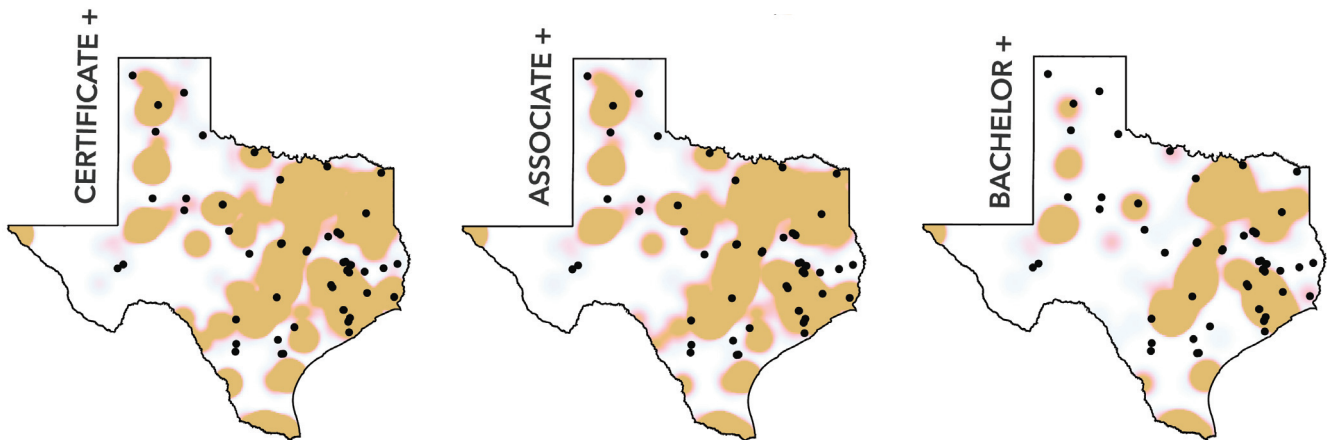


Geographical Disparities in Postsecondary Education Programming in Texas Prisons

Postsecondary education programs are provided through contracts with colleges and universities serving the geographic areas in which units are located. As seen in Figures 1 and 2, units in remote areas may struggle to provide programming due to minimal partnership opportunities with educational institutions and the lack of geographical proximity from prison units to main campus locations. Rural schools also might not have the capacity to support prison programming if the programming requires extensive travel from main campus locations and/or there are funding shortages for faculty and staff. Figure 2 further displays how prisons located near major cities often have more opportunities to provide programming as opposed to units in remote areas of Texas, especially when it comes to providing a bachelor's degree.

It is also important to consider that students served in these institutions may be released back into communities that are substantially farther from where they were initially being served. This creates additional barriers to continuing one's education post-release. TDCJ could benefit from prioritizing educational placement based on one's proximity to the community in which they will return, as well as one's proximity to family - a factor that has also shown to serve as a protection against continued criminality.³⁵

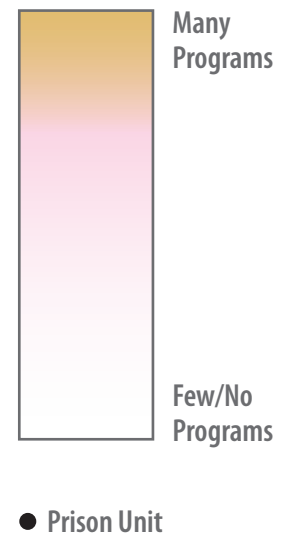
Figure 2: Distance Between Prisons and Pell-Eligible Programs



The distance between prisons and an eligible bachelor's degree program ranges from 0.6 to 84.8 miles, with a median of 19.4 miles and average of 25.0 miles. If that sounds far, keep in mind these are underestimations. In reality, there are few straight routes from a prison to a university. Rural prisons like the T.L. Roach Unit would need to travel not 84.8, but over 100 miles to the nearest university.

When expanding this map to consider schools offering an associate's degree, the range of travel shortens from 0.3 to 53.1 miles, with a median of 9.2 miles and average of 12.7 miles. Considering eligible certification programs further shortens the range from 0.3 to 41.8 miles, with a median of 8.7 miles and average of 11.7 miles. More eligible schools are close to prisons.

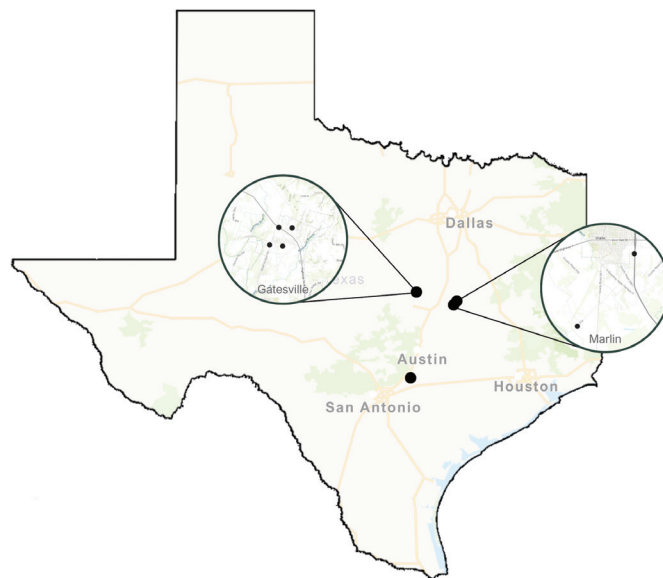
With over 700 postsecondary locations to show throughout Texas, this map opts for displaying density. "Many" can refer to as few as three schools in one small city, or over 30 in a single Metropolitan Statistical Area.



The Uniqueness of Women's Prisons in Texas

There are 64 adult prisons in the state of Texas.³⁶ These do not include prison-like facilities reserved for state jail felonies, intensive supervision only, substance use facilities (SAFPs), or pre-release facilities. Nor do they include multi-use facilities, those that are solely for “geriatric” residents, or those that are for medical/psychiatric purposes. Of these 64 prison units, seven are women's prisons, one of which is private and located just outside San Marcos. The other six are split on either side of I-35: four in Gatesville (roughly 45 minutes west of Waco.) and two in Marlin (approximately 40 minutes east of Temple, see Figure 3).

Figure 3: Women's Prisons Units



If you are a woman and get convicted of a crime that results in a prison sentence in the state of Texas, regardless of where you live (and how close/far your children and support network are), you will be serving time in one of these facilities. While these facilities are seemingly positioned “close” to larger cities, they are actually located in areas with minimal resources near the prisons themselves.

In Texas, women make up 7% of the overall population that TDCJ has “on hand” (i.e., currently sitting in prison), which is slightly over 8,500 women.³⁷ Though the number of women in prison may pale in comparison to their male counterparts, the placement of all women uniquely in one location lends very well to a criminological thesis that the criminal justice system, and the prison system especially, was built predominantly for men.³⁸

For criminologists who study women and crime, the approach of replicating the most widely accepted prison structure to “just-add-women-and-stir” ignores the decades of research that illustrate that the pathways that lead women to engage in crime are notably different from men.³⁹

Roughly 1 in 2 women in the U.S. have reported experiencing sexual or physical violence by someone close to them.⁴⁰ This experience is 3.7 times more likely to have occurred for women who are sitting in prison.⁴¹ In an experimental review of 41 empirical studies spanning over four decades, researchers found continued support of sexual violence victimization as a “gender-specific pathway to prison.”⁴²

Per the data collected on victimization by the Bureau of Justice and Statistics (BJS), through the National Crime Victimization Survey (NCVS), 28.2% of victims who experienced a sexual assault in 2022 were between the ages of 12 and 20; while 35.4% were between the ages of 21 and 34.⁴³ Collectively, these age groups make up more than 60% of those sexually victimized. Females, in comparison to males, experience victimization at a rate that is five times higher - with a rate of 3.1 victims per 1,000 persons ages 12 and over versus a rate of 0.6, respectively.⁴⁴

Research has shown that when someone experiences such an emotional trauma, especially in childhood, there is a significant likelihood that emotional dysregulation will ensue, which has a direct impact on later substance use.⁴⁵ For women especially, “child and/or adult sexual assault [has shown to be] strongly associated with alcohol use.”⁴⁶ Enter the intersection with criminality. Studies show that there is a strong correlation between female addiction and property crime.⁴⁷ This draws an indirect pathway from experiencing sexual assault/abuse to drug and property offenses.

A quarter of the women incarcerated across the US are sitting in prison because of drug offenses, while nearly a fifth are doing time for a property offense.⁴⁸ This makes up almost half of all women sitting in state prisons (44%).⁴⁹ To ignore the difference in pathways of criminality between men and women is tantamount to ignoring the factors that need to be addressed in order to diminish the likelihood of future offending. This means that adding women to a system and facilities that were primarily meant

for men is truly doing a disservice to the rehabilitative needs of the women under the supervision of any department of corrections, as well as to the families and communities that these women will be returning home to. The provision of programming, whether it be therapeutic, educational, recreational, or vocational, carries no exception. Thus, any department or institution serving women, “should examine their policies and [procedures] to develop a more trauma-informed and trauma-responsive” approach.⁵⁰

In reviewing potential PEP programs, it is critical that consideration be given to any empirical indicators that may impact student learning from not just an institutional or geographical perspective, but from a demographic perspective as well. For example, in an examination of ethnic and gender differences in first-year college students, investigators found female students to be more “extrinsically motivated and mastery-oriented,” whereas male students tend to be more “performance oriented.”⁵¹ Performance orientation places emphasis on a student’s achievements in relation to others and the overall metric of success, whereas mastery orientation indicates an ability to show a comprehensive understanding of the material at hand.⁵² Thus, male students may be more inclined to lift each other up if they can visibly see where the threshold is for optimal performance (i.e., getting a 90 out of a possible 100). Whereas a classroom full of women may benefit more from assignments that affirm their mastery of the content at hand rather than performing in competition with others (i.e., an essay examination rather than a test of multiple choice).

While college-level programming is offered across 4 of the 7 women’s prison units - via Texas Woman’s University, the Texas Prison Education Initiative, and Central Texas College - they are still subject to evaluation to determine if they are operating in the best interest of this student population.⁵³

The Impact of Education on Recidivism & Reentry

Decades of criminological research have illustrated the importance of education in reducing recidivism.⁵⁴ **Over the past 40 years, studies examining the impact of education on recidivism show that completing education while incarcerated reduces one's chances of recidivism, on average, by 28%.⁵⁵** Additionally, education is one of eight factors consistently shown to be critical in curbing one's likelihood of "re-offending."⁵⁶ This is primarily due to the education system's structure and the opportunities to excel legitimately, both while incarcerated and upon release.

The structure of education provides clear rules that are uniformly enforced and are academically demanding. It also fosters a space that centralizes the student's opportunities for success, where they can be treated fairly by interested parties and are praised for their accomplishments.⁵⁷ The provision of this space, which allows one to learn within a positively based framework, in turn, impacts three other central factors that affect one's likelihood to reoffend; these include attitudes that are favorable to illegitimate ways of achieving means (aka "*pro-criminal*" attitude), associates that favor engaging in illegal acts (aka "*pro-criminal*" associates), and what one does with their *leisure/recreational time*.⁵⁸

Given that every student in school is working towards the same goal, the educational setting becomes a pathway that like-minded individuals can walk together - turning "down-time" into an opportunity to move further by reading, writing, or completing assignments and projects. The work, time, and effort that one puts into doing so opens up one's mind to the existing opportunities that are not only legitimate but pro-social and would ultimately allow one to give back to one's family and community.

The impact of obtaining an education while incarcerated on an individual's life, post-release, is also notable. Once someone has reached their educational goals, the factor that then becomes key in maintaining a pro-social lifestyle is work.⁵⁹ In the U.S., there is an indirect correlation between the level of education and the rate of unemployment.⁶⁰ The higher level of education you receive, the less likely you are to be unemployed. The rate that someone will be unemployed without a high school diploma is 1.4 times higher than those with a high school diploma and 2.5 times higher than someone with a bachelor's degree. Now, consider the impact of incarceration.

According to national estimates, a quarter of all formerly incarcerated people do not have a basic high school diploma or General Education Development (GED) certificate, with three-quarters of those with GED certificates obtained while in prison.⁶¹ While formerly incarcerated people are "twice as likely to have no high school credential at all," they are also "8 times less likely to complete college."⁶² A completed degree, certificate, or licensure significantly mitigates the challenges one faces reintegrating back into society.⁶³

In their examination of 18 studies spanning over 30 years, researchers at the RAND Corporation and the Bureau of Justice Assistance (BJA) found the impact of education on post-release employment for incarcerated individuals to be significantly positive - as obtainment of education goes up, so does the likelihood of obtaining employment.⁶⁴ Across all studies, researchers found that the odds of securing employment post-release were 13 points higher for those who received education while incarcerated than for those who did not.⁶⁵ In one of those studies, which had the highest scientific methodology and rigor, **the effect of obtaining education while incarcerated on employment post-release from prison increased one's odds of attainment by 48%.**⁶⁶

New Application Process for Establishing a Pell-Funded Prison Education Program

In 2022, the ED published final regulations that educational institutions must abide by to be eligible for Pell-funded PEPs.⁶⁷

In the United States

In order to be recognized as a Pell-eligible PEP, an educational institution must obtain approval through multiple entities: the state's oversight entity (the state's Department of Corrections or other entity responsible for overseeing correctional facilities), the state's respective regional accreditation agency, and the US Department of Education (ED).⁶⁸

Once approved, the PEP operates for two years before a "Best Interest Review" is conducted. The "Best Interest Review" is a determination by the state's oversight entity (e.g., Department of Corrections) - with feedback and input from relevant stakeholders (e.g., advocacy organizations, state agencies, previously incarcerated students) - that the program is operating in the best interest of students. This determination *must* include an assessment of the following best interest determinants (BIDs):⁶⁹

1. Whether the experience, credentials, and rates of turnover or departure of instructors for the prison education program are substantially similar to other programs at the institution, accounting for the unique geographic and other constraints of prison education programs;

2. Whether the transferability of credits for courses available to confined or incarcerated individuals 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;
3. Whether the prison education program's offering of relevant academic and career advising services to participating confined or incarcerated individuals, while they are confined or incarcerated, in advance of reentry, and upon release, is substantially similar to offerings to a student who is not a confined or incarcerated individual and who is enrolled in, and may be preparing to transfer from, the same institution, accounting for the unique geographic and other constraints of prison education programs; and
4. Whether the institution ensures that all formerly confined or incarcerated individuals are able to fully transfer their credits and continue their programs at any location of the institution that offers a comparable program, including the same mode of instruction.

Additionally, the determination *may* include an assessment of the following BIDs:⁷⁰

1. Whether the rates of recidivism, which do not include any recidivism by the student after a reasonable number of years of release and which only include new felony convictions, defined as each sentence of imprisonment exceeding one year and one month, meet thresholds set by the oversight entity;
2. Whether the rates of completion reported by the Department, which do not include any students who were transferred across facilities and which account for the status of part-time students, meet thresholds set by the oversight entity with input from relevant stakeholders;
3. Whether the rate of confined or incarcerated individuals continuing their education post-release, as determined by the percentage of students who re-enroll in higher education reported by the Department, meets thresholds established by the oversight entity with input from relevant stakeholders;
4. Whether job placement rates in the relevant field for such individuals meet any applicable standards required by the accrediting agency for the institution or program or a State where the institution is authorized. If no job placement rate standard applies to prison education programs offered by the institution, the oversight entity may define, and the institution may report, a job placement rate, with input from relevant stakeholders;
5. Earnings for such individuals, which could include measuring such earnings against a threshold established by the oversight entity; and
6. Other indicators pertinent to program success as determined by the oversight entity.

Educational institutions must collect data on the four required assessors. They may also choose to collect data on any of the six optional assessors - or additional data points they deem relevant - to demonstrate that their Pell-eligible programs are operating in the best interest of the students.

At this best interest determination, the oversight entity gathers feedback from relevant stakeholders (e.g., an advisory committee) on the BIDs, and it considers the totality of the circumstances in which the PEP has been operating.⁷¹ If the oversight entity does not find a program to be in the best interest of the students, it must allow for programs to re-apply within a reasonable time frame.

In Texas

In Texas, educational institutions interested in becoming Pell-eligible PEPs must fill out an application with TDCJ.⁷² TDCJ has created an advisory committee, which includes various stakeholders from across the state (e.g., licensing agencies, Texas Higher Education Coordinating Board, technical assistance providers, advocacy groups, and students who were formerly incarcerated), to provide nonbinding input on PEP applications.⁷³ TDCJ gathers feedback from this advisory committee before making a decision on the approval or denial of an application.⁷⁴

In some states, prospective PEPs may also need approval from a state higher education coordinating board before they seek accreditor approval. The state of Texas does not have this requirement.⁷⁵ If the goal of Pell Reinstatement is to meet the best interests of students, the quality of the educational programming being offered should be prioritized on the front end. By requiring the Texas Higher Education Coordinating Board (THECB) to review applications *prior* to them reaching TDCJ, the Department could at least ensure they have been vetted in this way before seeking accreditation approval.

If approved, the application then moves on to Texas' regional accreditation agency, the Southern Association of Colleges and Schools Commission on Colleges (SACSCOC). Once approved by SACSCOC, the application then moves onto the US Department of Education (ED) for final approval. If granted approval, the PEP operates for two years before the oversight entity (i.e. TDCJ) completes an assessment on the best interest review determinants.⁷⁶ TDCJ will gather feedback from relevant stakeholders (i.e., the state's advisory committee), and consider the totality of the circumstances before making its determination.⁷⁷ If TDCJ does not find a program to be in the best interest of students, it must allow for programs to re-apply within a reasonable time frame.⁷⁸

What's Happening in Other States

As Texas moves forward in the Pell reinstatement process, TDCJ and its advisory committee can look at what other states are doing to improve access and robustness of their higher education programming.

The New England Commission on the Future of Higher Education (“the Commission”) released a June 2023 report where key regional stakeholders within the HEIP community created 15 recommendations to improve New England’s HEIP programs and increase access to sustainable, high-quality postsecondary and career pathways for incarcerated students.⁷⁹ The Commission’s recommendations were formulated by 83 stakeholders, hailing from various sectors; corrections, higher education, reentry, workforce development, and government. Notably, 20% of the individuals involved in the formulation of these recommendations were system-involved advocates themselves.

The Commission’s report included a variety of recommendations, including:

1. *Expanding technology usage and connectivity in DOC facilities to create a more modern learning environment.* As a part of TDCJ’s 2030 plan, the Department aims to increase broadband capabilities in all facilities by 2030.⁸⁰
2. *Opportunities such as internships and externships encourage the development of professional skills and employability upon release.* The expansion of technological resources and capabilities in TDCJ may allow more opportunities for these work-based learning initiatives.⁸¹
3. *Establish state-specific “credit transfer compacts” that signal higher education institutions’ acceptance of credits earned before and during incarceration.* While a state compact in Texas exists that allows for the transfer of “core-curriculum” classes, access to degree maps for transferring credits from a two-year institution to a four-year institution varies greatly across the state.⁸²

4. *Conduct a regional landscape assessment of existing course offerings in conjunction with DOCs, higher education institutions, employers and state labor departments to develop a plan for aligning postsecondary programming with labor market needs and in-demand skills/credentials.* While this work may fall within the purview of the current advisory committee to TDCJ, guidance and processes for doing so have not been publicly provided to them.

When engaging in outreach to other states, email correspondence and conversations with leaders in the HEIP field illustrate the current state of data collection and BID implementation for PEPs. Tracie Hightower, the Director of Education at Oregon's Department of Corrections, wrote that Oregon's DOC plans to redefine "rates of completion" for HEIP programs and collect data on the completion of both classes and programs once a definition has been reached.⁸³ Technological updates are a priority as well. To increase the accessibility and organization of future data collection, Oregon plans to change how college education is entered into their system. Hightower also notes that post-release educational opportunities are an important facet of data collection. As for optional BIDs, they plan to focus on the retention rates of students and integrating student evaluations. Hightower's main concern and potential limitation for data collection is short staffing, noting it as a "never-ending barrier." Further, Hightower notes that partnerships for data sharing of student evaluations force institutions to coordinate with each other, but it is a point of concern that is being worked through.

In conversation with Yolanda Houston, the Director of the Mississippi Consortium for Higher Education in Prison (MSCHEP), Houston highlighted the need for more time to collect data on the ED's best interest determinants.⁸⁴ She'd like to target specific data points, such as post-release educational opportunities and job placement rates, but these "aren't even in the discussion yet" as most institutions within MSCHEP are still in the application process.

While the states are different, the sentiment stays the same: data on BIDs, particularly optional ones, are limited at best and need more time for research and implementation. Many states are only in the beginning stages of the PEP process. Director Houston estimates that data collection and subsequently, recommendations will not be ready until "18 months and beyond."

The insights gained from this comparative analysis can inform the development and enhancement of HEIP programs in Texas. By integrating some of these recommendations from the Commission and planning for perceived data collection limitations, Texas can tailor HEIP programs to meet the unique needs of its incarcerated population. Implementing data-driven approaches and collaboration with stakeholders can enhance program effectiveness and establish long-term sustainability of programming.

Ensuring Effective Prison Education Programming Through Data Collection

Researchers who guide practitioners through the evaluation process will be the first to point out the role and importance of data.⁸⁵ It is not just having data, but being intentional about what data or information points are used to measure a larger concept/category - such as using grades or “pass/fail” to measure course completion or the number of credit hours a student is enrolled in to determine enrollment status. An evident theme woven throughout the needs and recommendations for moving forward as states focus on improving the quality and effectiveness of higher educational programming in prisons is the need to focus on and be intentional about data.

Luckily, when the ED issued the final regulations that institutions of education must abide by to be eligible for Pell-based funding, they also provided a guide to the concepts of measurement and the types of data agencies can and should be collecting to evaluate the quality and effectiveness of the programs being offered in their facilities.⁸⁶ Though not explicitly stated in this way, the language on best interest determination in §668.241 suggests larger concepts of measurement - *instructor experience, credentials, and retention, transferability of credits, academic and career advising, recidivism, completion, continuing education, and job placement* - as well as data points that can be used for purposes of evaluation (see Table 1).

Again, this language serves as a *guide* to the concepts and data that need to be collected and evaluated, not as the “end-all-and-be-all” of what deems effectiveness. Reframing the language of the section in this light can hopefully assist all stakeholders involved to: 1) determine

what overarching concepts are indicative of success for programming, 2) discuss and identify what information is currently being tracked that could help operationalize indicators of success under these larger concepts, and 3) create a workable list of additional indicators/concepts that stakeholders would like to see incorporated into the evaluation and reporting process.

In doing so, stakeholders can check one box associated with evaluation and measurement, *finding/collecting relevant data*; which in turn sets up evaluators to check the other, *producing valid and reliable data*.⁸⁷

Table 1: Suggested Measurement Concepts and Data Points by Required and Optional BID Language in §668.241

Measurement Concepts for BIDs	Possible Data Points as Indicators of Concepts
Instructor Experience, Credentials, and Retention	<ul style="list-style-type: none"> - Experience of Instructors <ul style="list-style-type: none"> - Number of years teaching - Course history (by course number & name) - Teaching practices <ul style="list-style-type: none"> - Type of teaching method, including but not limited to: <ul style="list-style-type: none"> - Lecture-based - Group learning - Technology-based - Including activities and opportunities for application of learning? (yes/no) - Are assessments and assignments varied? (yes/no) - Do practices foster engagement? (yes/no) - Achievement of learning outcomes <ul style="list-style-type: none"> - Clear expectations and standards of learning? (yes/no) - Collection of information to evaluate student learning? (yes/no) - Process for improving learning and other course outcomes based on evaluation? (yes/no) - Mentoring, advising, and guiding <ul style="list-style-type: none"> - Examples of student achievements or awards - Examples of student continued higher education in relevant field taught - Examples of student employment in relevant field taught - Credentials <ul style="list-style-type: none"> - Level of education - Certifications - Awards - Fellowships - Scholarships

Table 1 Continued

Measurement Concepts for BIDs	Possible Data Points as Indicators of Concepts
<p>Instructor Experience, Credentials, and Retention</p>	<ul style="list-style-type: none"> - Retention Rates <ul style="list-style-type: none"> - Instructor start date - Instructor of record by semester per course <ul style="list-style-type: none"> - Instructor ID, course, semester - Was this instructor the instructor of record in the previous semester? (yes/no) <ul style="list-style-type: none"> - If no, why not? - Instructor end date <ul style="list-style-type: none"> - Reason for end <ul style="list-style-type: none"> - Termination <ul style="list-style-type: none"> - Reason for termination - Opted to not return <ul style="list-style-type: none"> - Reason for non-return
<p>Transferability of Credits</p>	<ul style="list-style-type: none"> - Credits Offered Deemed Transferrable <ul style="list-style-type: none"> - Number of credits attempting to transfer <ul style="list-style-type: none"> - Number of credits eligible for transfer - Reasons for non-transferability for each credit(s) - Does the institution have a degree map? (yes/no) <ul style="list-style-type: none"> - If yes, is it up to date? (yes/no) - If no, why not? - Is advising for dual credits available? (yes/no) <ul style="list-style-type: none"> - If no, why not? - If yes, what triggers the advising process? - If yes, does advising include discussion of costs? <ul style="list-style-type: none"> - If no, why not? - Program Continuation at any Location of Institution Offering PEP <ul style="list-style-type: none"> - Is full transfer to another location of the PEP institution outside of prison possible? (yes/no) <ul style="list-style-type: none"> - If no, why not?

Continued on following page...

Table 1 Continued

Measurement Concepts for BIDs	Possible Data Points as Indicators of Concepts
Academic and Career Advising	<ul style="list-style-type: none"> - Academic Advising <ul style="list-style-type: none"> - Is there an academic advisor on the PEP team? (yes/no) <ul style="list-style-type: none"> - If no, why not? - Accessibility of advisor to students (office hours/appointment schedule) - Does the advisor proactively meet with a student? (yes/no) <ul style="list-style-type: none"> - If yes, how often? - If no, why not? - Can students evaluate advisors anonymously? (yes/no) - Are evaluation reports produced? (yes/no) <ul style="list-style-type: none"> - If yes, what do they say? - If no, why not? - Career Advising <ul style="list-style-type: none"> - Is there a career advisor on the PEP team? (yes/no) <ul style="list-style-type: none"> - If no, why not? - Accessibility of advisor to students (office hours/appointment schedule) - Does the advisor proactively meet with a student? (yes/no) <ul style="list-style-type: none"> - If yes, how often? - If no, why not? - Can students evaluate advisors anonymously? (yes/no) - Are evaluation reports produced? (yes/no) <ul style="list-style-type: none"> - If yes, what do they say? - If no, why not?
Recidivism*	<ul style="list-style-type: none"> - Felony Convictions Post-Release <ul style="list-style-type: none"> - Has the student been convicted of a felony 1-year post-program release? - Has the student been convicted of a felony 3 years post-program release? - Has the student been convicted of a felony 5 years post-program release?
Completion Rates*	<ul style="list-style-type: none"> - Completion by Enrollment Status <ul style="list-style-type: none"> - Enrollment status of student in PEP (part-time v. full-time) - Was PEP completed? (yes/no)

Table 1 Continued

Measurement Concepts for BIDs	Possible Data Points as Indicators of Concepts
Continuing Education Rates*	<ul style="list-style-type: none"> - Continuing Education Status <ul style="list-style-type: none"> - Enrollment in postsecondary education post-release? (yes/no) - If yes, type of program enrolled post-release <ul style="list-style-type: none"> - License or certificate - Associates - Bachelors - Graduate
Job Placement Rates*	<ul style="list-style-type: none"> - Job Placement <ul style="list-style-type: none"> - Level of education attained in prison <ul style="list-style-type: none"> - High school degree - GED - Some College - Associate’s Degree - Bachelor’s Degree - Graduate Degree - Professional license or certification - Student placed in job post program completion? (yes/no) <ul style="list-style-type: none"> - Within 3 months of completion - Within 9 months of completion - Within 1 year of completion - Type of job placement <ul style="list-style-type: none"> - Time limited (internship, fellowship, other temporary) - Permanent part-time - Full-time - Paid apprenticeship - Title & description of job - Industry/field - Student placed in a job relevant to degree, certificate, or licensure? (yes/no)

*Indicates measurement concepts for optional BIDs.

Promising Models for Data Collection

Two entities in Texas are current leaders in the data collection and evaluation process.

Lee College

In Texas, all public higher education institutions have an approved list of courses as part of their Texas Core Curriculum, which is approved annually.⁸⁸ The Core Curriculum includes most low-level courses in communications (i.e., writing), mathematics, sciences, creative arts, language/philosophy/culture, social & behavioral science, American history, and government/political science. Part of The Core Curriculum requires each course to have an established list of course objectives.⁸⁹

Each course must include three or four of the following objectives:

- Critical Thinking Skills (CT) - creative thinking, innovation, inquiry, analysis, evaluation, and synthesis of information
- Communication Skills (COM) - effective development, interpretation, and expression of ideas through written, oral, and visual communication
- Empirical and Quantitative Skills (EQS) - manipulation and analysis of numerical data or observable facts resulting in informed conclusions
- Teamwork (TW) - ability to consider different points of view and to work effectively with others to support a shared purpose or goal
- Social Responsibility (SR) - intercultural competence, knowledge of civic responsibility, and the ability to engage effectively in regional, national, and global communities
- Personal Responsibility (PR) - the ability to connect choices, actions, and consequences to ethical decision-making

In unison with other institutions, Lee College establishes these core objectives. However, they go a step further by linking each *assignment* to one or more of the objectives.⁹⁰ They do this as a way to collect more detailed student performance data and more adequately assess a student's personal growth within each of these objective realms.

Windham School District

Windham also collects a large quantity of data related to academic, vocational training, and life skills programs.⁹¹ The data they collect for each person participating in WSD programming includes an evaluation of:

- Institutional disciplinary violations
- Subsequent arrests
- Subsequent convictions or confinements
- The cost of confinement
- Educational achievement
- High school equivalency examination passage
- The kind of training services provided
- The kind of employment the person obtains on release
- Whether the employment was related to training
- The difference between the amount of the person's earnings on the date employment is obtained following release and the amount of those earnings on the first anniversary of that date
- The retention factors associated with the employment

The current data collection and evaluation being conducted by these HEIP leaders, in addition to the data points listed in Table 1, show us 1) what data points can serve as a baseline for PEP providers, and 2) what evaluation is possible when institutions or researchers have access to the appropriate data.

Ensuring Effective Prison Education Programming with Reliable and Valid Collection Tools

Once larger concepts of success have been identified, the identification of relevant data allows those involved in the decision-making process to focus on how the data is being collected and whether the tools being used to do so are not only consistent in their measurement (i.e., reliability) but also capture what they intend to capture (i.e., validity).

Take, for example, student evaluation surveys. These tools are often given to students at the end of each semester to determine 1) the quality of the course/course content, and 2) the quality of the instructor teaching the course. Outside of the fact that it is not uncommon for these evaluations to be given and never seen/reviewed again, there is a substantial amount of literature that has questioned the effectiveness of student evaluations in measuring the larger concepts of instructor and course quality.⁹² This is in large part due to our inability to account for biases (e.g., gender and race/ethnicity), response rates (i.e., the threshold of responses for effective evaluation is 60% or higher), and the overall reliability/honesty of responses.⁹³

If a program is using student evaluations and solely student evaluations to establish instructor and course quality, then the baseline of data/information being collected in this light has been compromised from the beginning and ultimately does not reflect what stakeholders want to know. This should not be misinterpreted as student evaluations having no value; they have immense potential to inform a myriad of different concepts in the classroom, just not the quality of the instructor or the course as a whole.

The concepts that *have* been shown as being accurately measured by student evaluations include but are not limited to:

- Class structure (e.g., organization, use of class time, instructor's approach to learning),
- Class workload,
- Class engagement,
- Class climate,
- Instructor availability outside of class,
- Timeliness and clarity of feedback,
- Clarity of goals and expectations in class, and
- Clarity and quality of an instructor's presentations.⁹⁴

In this situation, it is not a matter of whether student evaluations should be used, but how they are used and whether the questions and question structure of the survey measure the correct concepts to help inform any necessary decision-making - such as decisions regarding any changes an instructor should make and/or decisions on whether to retain or forgo future placement with the instructor. A more valid approach to determining "instructor quality" is to shift focus from this concept to an empirically based concept - such as the University of Kansas' *benchmarks for teaching excellence*, which are partially informed by student evaluations.⁹⁵

Under these benchmarks, the manner in which effective teaching is measured is through the following framework:

- Goals, content, and alignment of course,
- Teaching practices,
- Class climate,
- Achievement of learning outcomes,
- Reflection and iterative growth,
- Mentoring and advising, and
- Involvement in teaching service, scholarship, or community.⁹⁶

Within each of these concepts, the Center for Teaching Excellence points to where the information for evaluation should come from, including student surveys, and what that information should look like.⁹⁷ So, for example, in measuring “class climate,” questions on the student survey should ask students about the average condition of the class, rather than the quality of it. Questions along these lines can include questions like:

- Did you find the class climate to be motivating? Yes/No
- Did you find the class climate to be open and respectful? Yes/No
- Did you find the class promoted ownership of learning? Yes/No
- Did the instructor make themselves available outside of class? Yes/No
- Please provide a brief description of your learning experience. (Open-ended)

Again, the concepts and data points presented here are mere suggestions, and stakeholders should do their due diligence to ensure that each concept being measured is done so using data that 1) research indicates is an empirically based measure of the concept and 2) is collected in a manner that is not only reliable (i.e., consistent), but also valid (i.e., accurate). **Keep in mind that it is possible for a data collection tool to collect points of data in a consistent manner, and not be valid.** This is why it is of the utmost importance that any data point in question has been researched to determine whether it has in fact been deemed an empirical measurement of the overarching concept.

For instance, if student surveys are conducted and collected at the same point in time every semester, then the tool in question - the survey - can be deemed reliable. However, if that student survey only asks questions regarding an instructor’s quality or the quality of the course (e.g, on a scale of 1 to 5, 5 being excellent, how would you rate the quality of this course), then that survey is not valid, as the empirical literature surrounding student evaluations has shown that instructor and course quality are not concepts that can be adequately measured by student evaluations. Teaching experience, or an instructor’s ability to achieve “teaching excellence,” on the other hand, are empirically supported concepts.

The Importance of Data Sharing for Purposes of Evaluation and Reporting

Another critical piece in the process of data collection, evaluation, and reporting is the ability to access data from all relevant sources. **While it may seem feasible to expect one sole entity to be the main collector and distributor of data relevant to educational programming in prisons, the reality is that in order to determine whether the programming in question is in fact “effective,” data across multiple points in time and services must be assessed.**

Let's discuss job placement. This concept is one that is of particular interest to those supporting prison education programs, because like education, employment is a factor that also reduces future criminality.⁹⁸ Thus, being able to foster a pathway to employment is key to successful reintegration. In order to determine whether a PEP is successful at job placement requires that information be collected and analyzed not just on the education program itself, but on any additional education a student received before and while incarcerated and post programming or release. Assuming that the pathway of concern is employment post-release, then the information needed no longer lives in the Department of Corrections, but in the workforce realm.

To empirically draw a pathway from an educational program to job placement, evaluators need to:

1. Show that the educational program being offered is statistically related to student employment post-release (i.e., placement in the program impacts job placement in some way),
2. Show that the educational programming being offered preceded a student's job placement, and

3. Illustrate that no other programming/services being offered can account for the pathway to placement (i.e., programming has a direct relationship with job placement that is not influenced by external factors, such as alternative education received while or even before being incarcerated).

This means that the data required to conduct the evaluation will need to come from sources outside of the corrections department. So for Texas, in addition to collecting information from TDCJ, the relevant sources of information *just* to evaluate job placement would include, but are not limited to, the Texas Education Agency (TEA), the Texas Higher Education Coordinating Board (THECB), the Texas Workforce Commission (TWC), and the Texas Department of Licensing and Regulation (TDLR). For an evaluator, the ability to access data freely across all of these agencies would be nothing short of a dream.

Unfortunately, in practice, what is often lacking is the presence of an inter-agency data agreement. What often holds this place are memorandums of understanding (MOUs), between an education program being offered and the Department of Corrections as a whole. These MOUs are often reflective of a shared understanding of how a program is to operate while providing services in a prison, and conversely what a program expects from an institution in return for the provision of services (e.g., collection of data for purposes of evaluation, access to computers during instruction, ability to discuss attendance with a student). **While MOUs may be useful to establish a baseline understanding of operations, they usually do not go into much detail about data collection and sharing, for the purposes of evaluation and reporting.**

Data agreements, on the other hand, *solely* focus on the collection of data, the reason why the data is being collected (e.g., evaluation and reporting), as well as the intentions surrounding the collection (e.g., to inform program growth and development, to illustrate program outcomes, to notify decision makers of progress). It is also standard practice to include in these agreements any stipulations associated with the data that may contain publicly identifiable information. These stipulations can include but are not limited to: agreeing to only accessing the data via a virtually private network, deleting any publicly identifiable information upon receipt, using software that ensures full erasure of data from a machine's pathways once a file is deleted, not sharing the data with any external parties, or even agreeing to destroy the data after a certain time period has passed.

With comprehensive agency-wide data agreements in place, stakeholders and decision-makers would be better able to determine the effectiveness and quality of the educational programming being offered to students in prison. Piecemeal assessments could be avoided, and statewide policymakers could be informed on the role that education is playing in the prison system, and perhaps the value of allocating resources to its growth and development. **Remember, the key is to be intentional about data.** Therefore, any data agreement entered into should be offered and reviewed prior to the provision of any services being provided. This will prevent the need for any major adjustments in practice, and will overall help inform the approach being taken; as the data collected and used in any evaluation should be informed first and foremost by the literature.

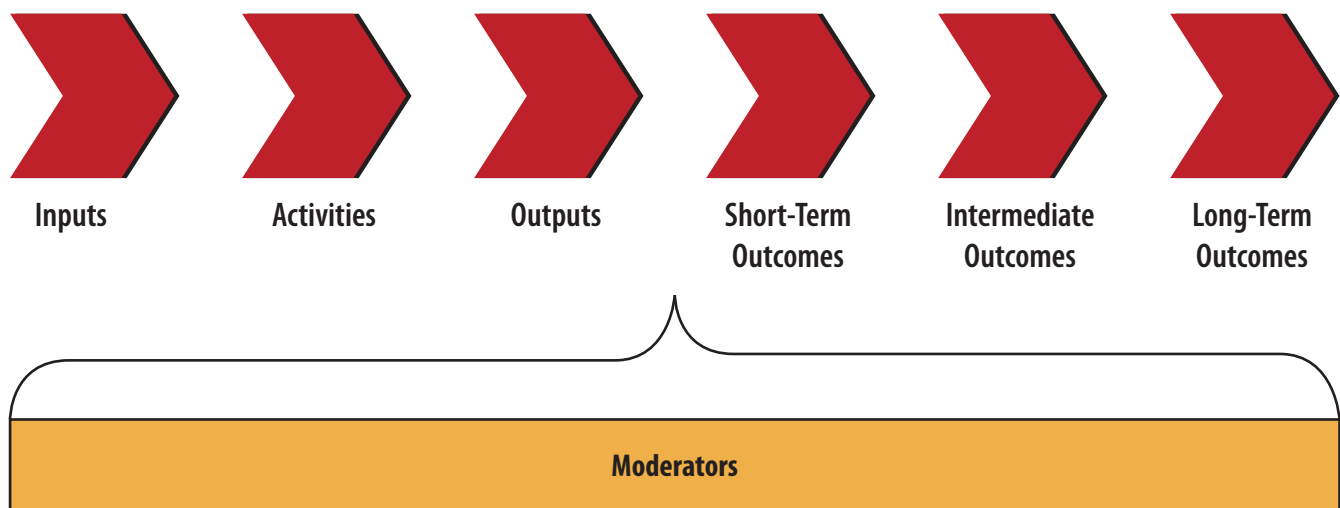
The Added Benefit of a Logic Model

It would be even more ideal, in addition to having an established data agreement with all relevant resources, for a proposed education program to have a logic model, or a “graphic illustration between a program’s resources, activities, and its intended effects.”⁹⁹ All relevant data points being collected and evaluated by a program to determine whether they are successful in achieving their intended effect are embedded in these models. The structure of it requires an investigator to logically identify a pathway from start to finish (see Figure 4).

When considering which education programs to implement, decision-makers should not only question the relationship a PEP has with data (e.g., do they collect it, do they use it to evaluate their services, do they have an agreement in place that illustrates their intention and purpose around data collection and evaluation); but also the amount of attention and detail given on the program’s behalf to determine whether the services they are providing are meeting the needs of both the students and the agency.

Like any other tool used in research, the quality of a logic model can vary. Those that do not incorporate outcome measures or moderators (i.e., factors that can amplify or diminish the impact of one variable on another) often fall short of illustrating true effectiveness and instead focus on reporting the mere completion of a program as a success. This can be misleading, as any audience reviewing an evaluation only reporting inputs through outputs will believe that a report of a 100% completion rate translates into something of value. If a program is ineffective or worse, counterproductive, completion becomes moot.

Figure 4: Logic Model Structure



Note: Figure was recreated from the Center for Disease Control (2020). Developing a logic model. Retrieved from https://www.cdc.gov/tb/programs/evaluation/Logic_Model.html

Conclusion & Recommendations

Pell Reinstatement has ushered the state of Texas into a new era: an era of opportunity, an opportunity to bolster educational opportunities, expand our workforce, enhance the intellect of those incarcerated, and strengthen our communities. Aligning the ED's best interest determination guidelines on data collection and evaluation with each education program's goals and desired outcomes can ensure that prison education programming *effectively* supports the rehabilitation and reintegration of individuals who are incarcerated, ultimately contributing to stronger *and* safer communities.

As states and correctional departments move forward in their efforts to increase these opportunities, it is important to remember the significance and role that data plays in implementing effective educational programs. If securing employment, continued education, and reducing recidivism are the goals of prison education programs, then ensuring that these programs are equipped to illustrate those outcomes empirically is the method to achieve those goals. Texas Appleseed proposes the following recommendations to help stakeholders do so:

1. ***Collect data in a robust and intentional manner to adequately measure the efficacy of prison education programming.*** Data collection is vital to maintaining the quality and rigor of prison education programming in Texas. Postsecondary institutions, THECB, WSD, TWC, and TDCJ should collect a vast array of data to adequately measure the efficacy of prison education programming. These data points include, but are not limited to: instructor credentials and retention, transferability of credits, academic advising, completion rates, recidivism, and job placement rates.
2. ***Consistent data evaluation (and reporting) to assess program effectiveness and identify areas for process improvement.*** As PEPs collect data on their programming and student outcomes, this data collection must come in conjunction with recurrent evaluation.

Evaluation is necessary to assess students' academic progress and outcomes, evaluate program effectiveness, and identify areas for process improvement. Additionally, this data and its evaluation should be available to the public and academic institutions for further research and expansion of postsecondary programming.

3. **More data sharing agreements amongst state agencies to allow for consistent access to relevant workforce, academic, and post-release data.** State agencies should establish data sharing agreements with one another to maximize access to relevant workforce, academic, and post-release data. These state agencies include but are not limited to: THECB, WSD, TWC, and TDCJ.
4. **Develop a strategic plan for processing PEP requests so stakeholders understand one another's roles and responsibilities in the approval and operation of PEP's.** As Pell Reinstatement continues to roll out and more postsecondary institutions enter the PEP space, TDCJ must establish a strategic plan for processing PEP requests. This plan should delineate the roles and responsibilities of THECB, WSD, TWC, TDCJ, TEA, TACC, TDLR, and other stakeholders involved in the approval and operation of PEP programs (necessary stakeholders are illustrated in ED's guidelines).
5. **Establish a robust Best Interest Review process using the data collected to ensure that PEPs are providing quality instruction.** Since Pell Grants are limited, it is in the state's best interest and the best interest of students to ensure that they are not being wasted with ineffective programming. It would be a waste of tax-payer money and a disservice to those incarcerated if the education they receive does not lead to better outcomes outside of prison. In addition, this data may prove useful in adjusting programs that are still meeting some standards but have room for improvement.

By implementing these recommendations and by leveraging the opportunity before us, we can build a Talent Strong Texas where formerly incarcerated students reach professional and financial prosperity.

Appendix: Methodology (Figures 1 & 2)

Mapping Opportunity for Higher Education in Prisons

Texas Appleseed used a quantitative approach to investigate how Texas Department of Criminal Justice (TDCJ) prisons could benefit from Pell Grant expansion by determining their proximity to eligible schools. We conducted a quantitative analysis of publicly available data from TDCJ and the Integrated Postsecondary Education Data System (IPEDS) using the ArcGIS World Geocoding Service and ArcGIS Pro 3.3 software.

Research Questions

We sought to answer two research questions:

1. How far are select TDCJ prisons from Pell Grant-eligible postsecondary institutions?
2. How does the level of programming offered at nearby postsecondary institutions (certificate, associate's, or bachelor's degree) affect a prison unit's opportunity for traditional, in-person instruction?

Data Collection - Prisons

Texas Appleseed obtained a unit directory from TDCJ. Those that are solely prison units (64) were selected.¹⁰⁰

Mapping - Prisons

Texas Appleseed used the Prisons Boundaries dataset, available from the Department of Homeland Security's HIFLD Open Data Portal.¹⁰¹ This file further refined using the TDCJ Unit Directory to select the 64 solely prison units. Finally, we used the polygon to point function to turn prison boundaries into a single point for each of the 64 units.

Data Collection - Schools

Texas Appleseed produced an initial list of Texas' Pell Grant-eligible postsecondary institutions from the IPEDS Compare Institutions

portal¹⁰² using a query of the most recently-available (2022-2023) *Institutional Characteristics: Institution Classifications* variables:

1. Postsecondary and Title IV institution indicator

Value = “Title IV postsecondary institution”

2. FIPS state code

Value = “Texas”

This selected 399 institutions for a data file containing additional variables explored in our analysis. We excluded query variables from the exported data file, as their entire field would redundantly contain the same values selected in the query.

We used the following variables in our analysis:

1. Highest level of offering

This *Institutional Characteristics: Institution Classifications* (2022-2023) variable includes the following values:

- 0 - Other
- 1 - Postsecondary award, certificate or diploma of less than one academic year
- 2 - Postsecondary award, certificate or diploma of at least one but less than two academic years
- 3 - Associate’s degree
- 4 - Postsecondary award, certificate or diploma of at least two but less than four academic years
- 5 - Bachelor’s degree
- 6 - Post-Baccalaureate certificate
- 7 - Master’s degree
- 8 - Post-Master’s certificate
- 9 - Doctor’s degree
- b - None of the above or no answer
- 2 - Not applicable, first-professional only
- 3 - Not Available

We created an additional summary field in our exported data file, as the level of precision of 9+ variables from IPEDS was irrelevant for our analysis focused on the following three groups:

- 1-2 - Award below Associate’s degree
- 3-4 - Associate’s degree or award below Bachelor’s degree
- 5-9 - Bachelor’s degree or above

Other values were excluded through the query, so summary values were only needed for values 1-9.

2. Street address or post office box, city location of institution, state abbreviation, and ZIP code

These *Institutional Characteristics: Directory information* (2022-2023) variables provide the necessary information to geocode (map) each school.

Considering many schools function in multiple campus locations, we verified each address by hand, as described in the Data Expansion section.

3. Full-time and part-time retention rates

These *Retention rates, Entering Class and Student to Faculty Ratio: Retention Rates* (Fall 2022) variables include values that are exclusion-adjusted percentages of the previous fall cohort that re-enrolled at the institution as either full- or part-time in the current year (Fall 2022).

It remains undetermined whether retention rates refer only to the specific campus location entered in IPEDS, or represent a combined rate of multiple campus locations; this seems to depend on what each institution chose to submit.¹⁰³

4. Community college classification

We created an additional notes field in our exported data file for miscellaneous comments on entries. Here, we noted whether a school happened to be a community college as these are known to host various *Highest levels of offering* through partnerships with higher level institutions.

These were initially identified through the Texas Higher Education Coordinating Board's List of Public Community College Districts,¹⁰⁴ then verified as described in the Data Expansion - Schools section.

Data Expansion - Schools

Given our familiarity with certain schools functioning in multiple campus locations, we identified that IPEDS data cannot reliably answer our research questions without expansion to accommodate there being multiple campus locations at several institutions.¹⁰⁵

Some listed addresses referred to an institution's central administrative office and not an educational location. We hand-verified school addresses by searching Google maps and visiting each institution's website (if available). Through this search, we updated school names and excluded closed schools and central, non-educational offices from our list.

Through this search, we expanded on the list of postsecondary institutions by creating a new entry for noncontiguous educational locations that were listed on a school's website. We preserved a connection to each additional school location's initial IPEDS entry (usually a primary campus) by duplicating the full entry and updating only the name and address fields. This made for a total of 747 educational locations, a net growth of 348.¹⁰⁶

We noticed that educational partnerships exist, particularly between four-year universities offering Bachelor's degrees and community colleges entered into IPEDS with a lower level of degree offering. In such cases where it was evident that a higher level of programming was offered on site, the highest degree offering was copied from the partner organization and the school name was updated to reflect the partnership name.

Mapping - Schools

We employed the ArcGIS World Geocoding Service to use the Geocode Addresses (Geocoding) tool within ArcGIS Pro 3.3 to map schools from the expanded data file. This tool can take multiple fields - in our case, the street address or post office box, city location of institution, state abbreviation, and ZIP code variables - to generate an output feature class where spatial analysis can be performed.¹⁰⁷

We considered ways to visualize these data points (n=747) clearly alongside prisons. Ultimately, a heatmap made the most sense as this could visualize where schools were concentrated as a single sliding color scale drawn underneath prisons (See maps in Figure 2: Distance Between Prisons and Pell-Eligible Programs). Using the Kernel Density tool within ArcGIS Pro 3.3 with area units of US Survey miles, output cell values of densities, and the Geodesic Method, we made three heatmaps containing:

1. Certificate +

This includes all schools with highest level of offering summary field values of:

1-2 - Award below Associate's degree

3-4 - Associate's degree or award below Bachelor's degree

5-9 - Bachelor's degree or above

2. Associate +

This includes all schools with highest level of offering summary field values of:

3-4 - Associate's degree or award below Bachelor's degree

5-9 - Bachelor's degree or above

3. Bachelor +

This includes all schools with highest level of offering summary field values of:

5-9 - Bachelor's degree or above

We used a cross-comparison between these heatmaps and a map of the data as points to determine that concentrations ranged from as few as three schools in a city to over 30 in a single Metropolitan Statistical Area. As such, "Many Programs" (Figure 2) refers to as few as three schools in a city to over 30 in a single Metropolitan Statistical Area.

Mapping - The Texas Higher Education in Prison Consortium

We hand-coded prisons served by the Texas Higher Education in Prison Consortium, drawing from a list published by the Education Trust.¹⁰⁸ In the prisons shapefile, we added a field to reference the IPEDS ID for the associated school, using a comma to delineate multiple schools. This suffices to visualize whether a prison is served by the consortium (See Figure 1: Map of Prison Units Offering / Not Offering Postsecondary Education Programming).

To visualize whether a school participates in the consortium, we exported the prisons shapefile in order to insert duplicate rows for prisons serviced by multiple schools, listing just one IPEDS ID that would qualify as a match field within ArcGIS Pro. Selecting our expanded IPEDS file as a target layer, we added an inner join of both datasets using the IPEDS ID as the match field. We exported this joined layer as a new feature layer containing only the locations of schools participating in the consortium, then removed the join from the initial layer to preserve it.¹⁰⁹

Near Analysis Findings

We ran three near analyses on the same highest level of offering summary field values used for the heatmaps to determine precise distances between schools and prisons. We then directed the Near (Analysis) tool in ArcGIS Pro 3.3 to find the closest school to each prison within a Geodesic search radius with prisons as input features and schools as the selected “near features,” recording the distance in US Survey Miles within the prisons shapefile. Finally, we exported the prisons attribute table to calculate summary data (See descriptions in Figure 2: Distance Between Prisons and Pell-Eligible Programs).

Though we ran this analysis three times with different summary field values, the Near (Analysis) tool matched some prisons to the same data each time. We confirmed this is not an error, but an indicator that the prison’s overall closest school offered the highest level of offering: 5-9 - Bachelor’s degree or above.

Endnotes

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