Why Data and Why Now?

The Importance and Challenges of Data for Higher Education in Prison

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Executive Summary

The restoration of Pell Grant eligibility in 2024 has catalyzed a new era for higher education in prison, opening doors for approximately 800,000 incarcerated individuals to pursue postsecondary education. Nearly 400 higher education in prison programs now operate across the US, yet basic data about these students at scale—such as enrollment, retention, and completion—is often inaccessible or inconsistent. As these programs expand, strengthening data infrastructure has become both a practical necessity and a moral imperative.

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This report, part of a multi-year research initiative, explores the current landscape of data use in the higher education in prison field and identifies barriers to building a more comprehensive and sustainable data infrastructure. Drawing on extensive desk research and interviews with stakeholders, the report highlights a complex, fragmented data ecosystem marked by misaligned priorities, siloed systems, and underinvestment in staff capacity. With the return of Pell Grant eligibility, the federal government has recommitted to college access for students who are incarcerated—now the field must meet that commitment with the data systems needed to ensure accountability, transparency, and greater opportunity for these students.

Better data is essential to realizing the promise of higher education in prison. With reliable, accessible, and ethical data practices, programs can better support student success, identify and address disparities, and advocate for resources and reform. Strong data infrastructure also enables compliance with federal Pell Grant requirements and builds the case for sustained public investment. At this turning point, data is not just a tool for accountability—it is a foundation for educational quality and meaningful opportunity.

Key barriers we uncovered include:

- **Fragmented Data Systems:** Higher education programs, their host institutions, and departments of corrections (DOCs) often maintain separate and incompatible data systems. Many programs rely on manual or informal processes to collect data, limiting their ability to track outcomes, support students, or meet new federal reporting requirements tied to Pell eligibility. Even when host institutions collect these data and integrate them into their student information systems, these data are often underutilized and inaccessible to key stakeholders.
- **Lack of Coordination:** Technology and communication disconnections between educational programs in prison and institutional offices—such as institutional research or student affairs—result in limited data sharing and hamper analysis. Programs also face challenges collaborating with DOCs, which control eligibility and transfer data but often face capacity, policy, and technical constraints for facilitating data-sharing.
- **Capacity Constraints:** Many higher education programs operate with minimal resources and staff, leaving little room for dedicated data collection or analysis. This is further compounded by limited support from host institutions or corrections partners and a lack of training.
- **Privacy Concerns:** Protecting the dignity and safety of students who are incarcerated or formerly incarcerated is paramount. However, inconsistent documenting of incarcerated students in campus systems, limited control over how data are shared, and misaligned policies between educational institutions and corrections agencies heighten the risk of data misuse or student stigma.
- **Uneven Progress Across States:** While some states—such as New York through SUNY's Office of Higher Education in Prison—have developed robust, linked data systems, many others struggle with data standardization, limited access to statewide longitudinal systems, and weak inter-institutional coordination.

Despite these challenges, the report spotlights encouraging practices already underway. Some programs have crafted thoughtful data-sharing agreements with DOCs, established collaborative partnerships with accrediting agencies, and begun integrating data on students who are incarcerated into institutional systems.

In this pivotal moment, investing in data is not just a compliance necessity—it is essential to ensuring educational equity, program quality, and long-term success for students who are incarcerated.

Acknowledgements

Introduction

Higher education in prison in the United States is at a pivotal moment. Three decades after the 1994 Crime Bill eliminated federal Pell Grant eligibility for incarcerated students,[1] the restoration of federal funding in 2024 marks a major turning point—opening new educational opportunities for hundreds of thousands of incarcerated Americans. According to estimates from the US Department of Education, approximately 800,000 individuals are now eligible to receive federal aid to attend college while in prison.[2] Even before this policy change, higher education in prison programming was expanding, fueled by investment from private philanthropy and sustained by the commitment of colleges, universities, and advocates committed to promoting educational access in the absence of public funding. Today, nearly 400 higher education programs operate in correctional facilities across the country—a dramatic increase from the handful that remained after Pell was eliminated in the 1990s.[3]

Despite this recent expansion, we still know surprisingly little at scale about the population of students who are incarcerated. Basic information commonly available for US college students—from data on enrollment and courses of study, to retention and graduation rates—is often difficult or impossible to obtain for those attending college while incarcerated. Without these data, assessing the quality and scope of these educational experiences is nearly impossible. As the field of higher education in prisons reaches a new level of maturity, overcoming these challenges is essential to sustaining and scaling high-quality higher education opportunities.

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[1] Violent Crime Control and Law Enforcement Act of 1994, Pub. L. No. 103-322, 108 Stat. 1796 (1994), https://www.congress.gov/103/bills/hr3355/BILLS-103hr3355enr.pdf.

[2] Department of Education, "U.S. Department of Education to Launch Application Process to Expand Federal Pell Grant Access for Individuals Who Are Confined or Incarcerated," Press Release, June 30, 2023.

[3] "National Directory of Higher Education in Prison Programs," Alliance for Higher Education in Prison, May 2023, https://www.nationaldirectoryhep.org/national-directory/stats-view. The Alliance defines higher education in prison programs as programs that provide postsecondary education, are formally affiliated with a college or university, and require students to have obtained a high school diploma or equivalent to be eligible for admission.

Part of the motivation for increasing the availability of good data is practical: the return of Pell Grant eligibility for students who are incarcerated brings new federal data reporting requirements. But the stakes go beyond Pell. Reliable data is necessary to ensure that these students have access to high-quality education and the support they need to earn a credential. Without better data, we cannot know which students are being served, whether the education provided is comparable to that offered on campus, what practices are most effective, and how programs can best support student success—both during incarceration and after release.

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Calls for better data in higher education in prison have begun to emerge from both practitioners and researchers.[4] Programs across the country are experimenting with new approaches to data collection and reporting, and several have taken steps toward building more comprehensive data ecosystems—in collaboration with their host institutions and correctional partners. The field is in motion. This report, part of a larger multi-year project, seeks to contribute to that momentum by developing a shared understanding of the current data pipeline and by identifying pathways to build the infrastructure needed to advance equity, accountability, and long-term sustainability.

Drawing from desk research and interviews, this report examines both the challenges and opportunities presented by the current data infrastructure. As we show, data collection in higher education in prison programs is fraught with difficulties, many of which stem from persistent communication and coordination barriers among key stakeholders. These programs, their host institutions, state agencies, and the correctional systems in which they operate all collect data that is essential to evaluating program effectiveness. Yet each entity operates according to its own priorities, reporting structures, and regulatory requirements—and these often vary not only across states, but even across programs or

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[4] Erin Castro and Amy Lerman, "Invisible Students: Challenges to Evaluation in Prison Higher Education," *Metropolitan Universities* 34, no. 4 (April 3, 2025), https://doi.org/10.18060/28169.

facilities within the same state system.

Despite these challenges, the benefits of investing in more robust and coordinated data systems are clear. We highlight promising practices already emerging across the field, showing how some stakeholders are building stronger partnerships, improving coordination, and addressing issues of privacy and data security from the ground up. Our goal is to foster dialogue across institutions and agencies, raise awareness of the innovative practices already underway, and create space for a shared discussion around common challenges.

In the conclusion, we outline next steps in our multi-year project, including efforts to enhance data capacity and infrastructure in partnership with selected programs and agencies on the ground.

Existing Evidence and Persistent Gaps

The restoration of Pell Grant eligibility for students who are incarcerated and the rapid evolution of the higher education in prison field make data collection improvements and quality assurance efforts more urgent than ever, as many programs (and their affiliated institutions and state agencies) in the field struggle to track even basic information, such as how many students are enrolled, how many credentials are being earned, and at what rate.[5] Fragmented data systems and inconsistent reporting practices are significant barriers to effective programmatic data management, with most colleges and universities still struggling to fully integrate students who are incarcerated into their existing data infrastructure and reporting processes.

Yet despite persistent data limitations, the field is not without evidence. Over the past decade, a growing body of research has demonstrated the effectiveness of higher education in prison, highlighting benefits for students, their communities, and society at large. Meta-analyses have

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[5] Erin Castro and Amy Lerman, "Invisible Students: Challenges to Evaluation in Prison Higher Education," *Metropolitan Universities* 34, no. 4 (April 3, 2025), https://doi.org/10.18060/28169.

provided foundational evidence on the effectiveness of higher education in prison, finding that individuals who participated in correctional education were significantly less likely to recidivate and were more likely to obtain employment post-release, with employment odds increasing by 12 percent among participants.[6] Similarly, a study using propensity score matching found lower three-year recidivism rates among participants in prison-based college programs compared to matched controls.[7] Evidence on employment outcomes is also encouraging. Research using administrative and employment data in Minnesota found that earning a postsecondary credential in prison was associated with higher wages, increased work hours, and reduced recidivism.[8]

While these studies have been instrumental in demonstrating the societal benefits of prison education programs—and in making the case for public investment through policies such as the restoration of Pell Grant eligibility—they are limited in scope. Most focus narrowly on individual criminological and economic outcomes, such as recidivism and post-release employment, but provide little detail on the public returns to increased investment in prison education programs. As a result, they often overlook other dimensions of the incarcerated student experience and fail to capture outcomes that are central to education research more broadly, including learning gains and academic engagement, persistence and completion, and other individual and social benefits.

This gap has been only partially addressed by a handful of qualitative studies and a few state-level evaluations. Qualitative research has been

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[6] Lois M. Davis et al., "Evaluating the Effectiveness of Correctional Education: A Meta-Analysis of Programs That Provide Education to Incarcerated Adults," *RAND Corporation*, 2013 https://www.rand.org/pubs/research_reports/RR266.html. Lois M. Davis et al., "How Effective is Correctional Education, and Where Do We Go from Here? The Results of a Comprehensive Evaluation," *RAND Corporation,* 2014, https://www.rand.org/pubs/research_reports/RR564.html. Robert Bozick et al., "Does Providing Inmates with Education Improve Postrelease Outcomes? A Meta-Analysis of Correctional Education Programs in the United States," *Journal of Experimental Criminology* 14, no. 3 (September 2018): 389–428, https://doi.org/10.1007/s11292-018-9334-6.
[7] Ryang Hui Kim and David Clark, "The Effect of Prison-Based College Education Programs on Recidivism: Propensity Score Matching Approach," *Journal of Criminal Justice* 41, no. 3 (May 2013): 196–204, https://doi.org/10.1016/j.jcrimjus.2013.03.001.
[8] Grant Duwe and Valerie Clark, "The Effects of Prison-Based Educational Programming on Recidivism and Employment," *The Prison Journal* 94, no. 4 (2014): 454-478, https://doi.org/10.1177/0032885514548009.

especially important in broadening the lens beyond recidivism and employment, offering a fuller picture of the student experience and the multifaceted impacts of participating in postsecondary education in prison.[9] For example, drawing on in-depth interviews with individuals who participated in higher education while incarcerated, one study found that students reported increased self-confidence, stronger communication and leadership skills, and improved relationships with family members.[10] Findings from a separate study, drawing on focus groups with incarcerated students and interviews with correctional staff across four facilities in three states, also suggest that education in prison contributes to safer facility environments and supports meaningful shifts in student identity.[11]

In the few instances where more complete student data are available, evaluations have played a critical role in generating insights to inform program design and implementation and to assess equity and quality. The State University of New York's Office of Higher Education in Prison (SUNY HEP) has developed one of the most comprehensive efforts to date. To understand how SUNY programs serve students during and after incarceration, SUNY HEP created a longitudinal data system that links regularly collected student data from the SUNY Institutional Research Information System (SIRIS) and the National Student Clearinghouse with individual-level corrections data. In its most recent report, SUNY HEP researchers use this unique dataset to examine incarcerated student enrollment, course-taking patterns, and retention and complete rates, yielding insights that are rare in the field.[12] The report finds, for instance, that students who are incarcerated often perform well academically, but face substantial barriers to degree completion due to facility transfers or release dates that interrupt their educational trajectory.

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[9] Shadd Maruna, *Beyond Recidivism: New Approaches to Research on Prisoner Reentry and Reintegration* (New York: NYU Press, 2020).

[10] Emily Pelletier and Douglas Evans, "Beyond Recidivism: Positive Outcomes from Higher Education Programs in Prisons," *Journal of Correctional Education (1974-)* 70, no. 2 (2019): 49–68, https://www.jstor.org/stable/26864182.

[11] Laura Winterfield et al., "The Effects of Postsecondary Correctional Education: Final Report." *The Urban Institute,* September 3, 2009, https://www.urban.org/research/publication/effects-postsecondary-correctional-education.

[12] Thomas Gais, Rebecca Grace, and Paul Wilner, "Participation & Outcomes in SUNY College-in-Prison Programs." *Office of Higher Education in Prison, State University of New York*, November 2023, https://www.suny.edu/media/suny/content-assets/documents/education/prison-ed/PARTICIPATION-AND-OUTCOMES-IN-SUNY-COLLEGE-IN-PRISON-PROGRAMS-V2.pdf.

Insufficient data infrastructure, however, has hindered effective program evaluations within the field. Existing data systems remain siloed across higher education in prison programs, their host institutions, corrections departments, and state agencies, impeding efforts to assess outcomes consistently or at scale.[13] The lack of standardized data collection limits the field's understanding of who is being served by current programs, best practices for effective programming, and factors that contribute to the long-term success of students who are incarcerated.[14] Even research on recidivism and employment—the focus of much of the recent scholarship—remains constrained, with evaluations unable to assess impact across more than a small number of programs. This constraint then limits our understanding of the public returns to higher education in prisons, which could motivate greater investment in scaling access to high-quality programs. Building a data infrastructure that can support continuous learning and accountability would not only strengthen the evidence base about the benefits of higher education in prison, but also support more effective program design and greater access to educational opportunities for incarcerated students.

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[13] Emily Kersten et al., "Data Collection and Reporting of College Students with Incarceration Histories: An Update from the Field," *University of Utah: Research Collaborative on Higher Education in Prison* 100, no. 4 (2024): 1910–34, https://www.higheredinprison.org/publications/data-collection-and-reporting-of-college-students-with-incarceration-histories.

[14] Lois Davis and Michelle Tolbert, "Evaluation of North Carolina's Pathways from Prison to Postsecondary Education Program," *RAND Corporation,* 2019, https://doi.org/10.7249/RR2957. Niloufer Taber and Asha Muralidharan, "Second Chance Pell: Six Years of Expanding Higher Education Programs in Prisons, 2016–2022," *Vera Institute of Justice*, 2023, https://vera-institute.files.svdcdn.com/production/downloads/publications/second-chance-pell-six-years-of-expanding-access-to-education-in-prison.pdf.

Why Better Data Matters

Expanding and improving data collection in higher education in prison programs would serve multiple critical purposes for individual programs, their affiliated institutions, their communities, and the field as a whole. First and foremost, improved data infrastructure can help programs better support their students and improve outcomes. More comprehensive data collection also allows institutions to have a robust understanding of the specific needs of students who are incarcerated, track their progress over time, and tailor academic support services accordingly. Furthermore, disaggregated data can reveal disparities in student access, retention, and completion rates, equipping programs to devise more targeted interventions and address inequities in outcomes across student groups. Finally, compiling data across programs and institutions in a particular state or state system can inform and direct public and private investments in programs that benefit the public good.

The restoration of Pell Grant eligibility increases the urgency for higher education in prison programs and their host institutions to collect and analyze data on student outcomes and program impact. Institutions seeking Pell approval for their Prison Education Programs must demonstrate that their academic and student support offerings inside correctional facilities are comparable to similar programming on campus.[15] This information is required for the Best Interest Determination—the final step in the US Department of Education's approval process for these programs—and necessitates reliable data to assess alignment between programs across settings. Even for programs not pursuing Pell funding, it is still critical for institutions to evaluate the comparability of their educational offerings. Students who are incarcerated may face different learning circumstances, but they are students of the institution and must be included in efforts to evaluate how well the institution's programs are serving their entire student population.

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[15] Higher Education in Prison (HEP) is an informal designation for prison education programs in the field. Prison Education Program (PEP) is used as both an informal designation and an official designation given to prison education programs seeking authorization to or authorized by the US Department of Education to award Pell grants (see call-out box). Throughout, we use higher education in prison to refer to programs generally and prison education program to refer to those seeking authorization or are authorized to offer Pell grants.

Becoming a Pell-Eligible Program:
A Primer on the Prison Education Program Approval Process

All new or existing higher education in prison programs seeking Pell grant eligibility for their current or future students must apply to become an approved Prison Education Program with the US Department of Education (ED). The approval process takes a minimum of two years and can be broken down into three core phases: the initial approval process, a period of program monitoring and data collection, and the Best Interest Determination process. As of the most recently available list provided by ED, December 4, 2024, 21 Prison Education Programs have completed the first phase and received provisional approval to operate, but no programs have completed the full process yet.*

The first phase of the Prison Education Program approval process requires the higher education institution to secure approval from the program's oversight entity (typically the state department of corrections, but the Federal Bureau of Prisons may serve in this role if the program is housed in a federal carceral facility), the institution's accrediting agency, and the ED. Once each party has signed off on the program's application, it is granted provisional approval, making its students Pell grant-eligible.

In the second phase, programs are required to submit data on credential attainment and students' post-release outcomes to their oversight entity (and subsequently the ED). Additionally, the institution's accreditation agency will perform a site visit within one year of the program's provisional approval, although this is only required for the first two sites if a Prison Education Program is operating across multiple correctional facilities.

*"Approved Prison Education Programs," Federal Student Aid, US Department of Education, December 4, 2024, https://studentaid.gov/data-center/school/pep.

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The final phase of the approval process consists of a comprehensive program review, led by the oversight entity, to assess whether the program is operating in the best interest of students. This process, called the Best Interest Determination, must occur within two years of the date the program receives provisional approval. The ED has released general guidelines for the approval process, but many key details and specific program criteria are subject to the discretion of the oversight entity including which metrics will be considered, how to assess them, and how different metrics will be weighed and considered for making a final determination.

- **Instructor experience and credentials:** Programs must provide information on their instructors' experience, credentials, and turnover rate and compare these factors to those of instructors in other programs at the institution.
- **Transferability of credits:** Programs must explain how the credits earned in their programs transfer and apply toward related degrees or certificates within the institution, comparing them to credits earned in similar programs at the institution.
- **Availability of student services:** Programs must assess whether the academic and career advising services offered to incarcerated students— while they are incarcerated, before reentry, and after release—are comparable to those available to non-incarcerated students at, and possibly transferring from, the same institution.
- **Continuity of study:** Programs must provide evidence that students can fully transfer their credits and continue in their program at any campus or location of that institution offering a comparable program.

ED's guidelines also suggest additional optional criteria the oversight entity may seek to include in their determination such as recidivism rates, completion rates, rates of continuing education enrollment post-release, job placement rates, and earnings information in the Best Interest Determination assessment.

Robust, high-quality data collection also strengthens the ability of higher education in prison programs to demonstrate their social impact and articulate the return on public investment. Reliable data enables programs to assess broader societal outcomes, such as reduced recidivism, improved post-release employment, and successful community reintegration of students who were formerly incarcerated. For programs that rely on philanthropic support, the ability to provide data-driven evidence of effectiveness can be a key in securing funding. A stronger evidence base also equips programs and their partners to engage more effectively in advocacy—making the case to state legislators and other stakeholders for sustained public investment and policy support for higher education in prison.

Benefits of Strengthening Data Infrastructure

- **Supporting Students**: More comprehensive data can help institutions better understand the needs of students who are incarcerated, tailor academic support services, and track student progress.
- **Addressing Inequities:** Disaggregated data can reveal disparities in access, retention, and completion rates, enabling targeted interventions.
- **Understanding Societal Benefits:** Reliable data can provide insights into the long-term impact of the programs on reducing recidivism, improving post-release employment outcomes, and fostering community reintegration.
- **Demonstrating the Return on Investment:** A stronger evidence base can support advocacy efforts vis-a-vis legislators and other stakeholders, making the case for sustained funding and policy support.

Improving Comparability to Similar Programs Outside: Ensuring quality is aligned with offerings at the campus outside— a critical requirement for Pell approval.

Methods

This report draws on a combination of desk research, policy analysis, and stakeholder interviews to better understand the state of data infrastructure in higher education in prison, and identify actionable strategies for improvement. This approach allowed us to surface both system-level challenges and local operational realities across a diverse range of institutional and agency contexts.

We began with a review of existing literature, publicly available reports, and relevant policy documents to examine how data on students who are incarcerated or formerly incarcerated is currently collected, managed, and analyzed. This included analysis of state longitudinal data systems, policy guidance related to Prison Education Program approval, and ongoing efforts to align corrections and education data at the state and national levels. These materials helped us map the key actors in the field and identify recurring issues—such as data silos, reporting inconsistencies, and limited cross-agency coordination—that continue to hinder progress.

To deepen this understanding, between October 2024 and February 2025, we conducted 22 semi-structured interviews with a total of 45 individuals. Participants included leaders from national educational data organizations, state departments of corrections (DOC), higher education in prison program staff, institutional researchers at colleges and universities offering higher education programs in prisons, and technical assistance providers. We leveraged a combination of stratified convenience sampling and snowball sampling to ensure a diverse range of perspectives—from national policy experts to frontline practitioners—while recognizing that the sample is not representative of any specific region or stakeholder group.

Each interview lasted approximately 60 minutes and was conducted virtually, primarily via Webex. IAt least two members of the project team attended each interview, one of whom served as note-taker. With participant permission, some interviews were recorded to support accuracy in analysis. To encourage open dialogue on politically sensitive topics, participants were assured anonymity and informed that no direct quotes or attributions would appear in the final report.

Interview protocols followed a flexible, semi-structured format and evolved

over time as themes emerged. This iterative approach allowed us to revisit pressing issues and ask more targeted follow-up questions in later conversations. Analysis occurred throughout the process: team members met regularly to share observations and review notes and transcripts. We synthesized key themes across interviews, identifying persistent challenges such as limited staff capacity, inconsistent data definitions, and complex relationships between institutions and DOCs.

In addition to interviews and desk research, ITHAKA's JSTOR Labs facilitated a design jam—a structured ideation session involving both internal and external stakeholders. This session included members of the core project team, Ithaka S+R staff not directly involved in the project, and representatives from key stakeholder groups. The goal of the session was to generate creative responses to the challenges raised in interviews, assess their feasibility, and prioritize solutions based on stakeholder input. Through a series of collaborative exercises, participants defined barriers, sketched possible solutions, and explored tradeoffs.

Together, these methods helped us triangulate evidence, validate emerging findings, and surface impediments to building a stronger, more comprehensive data infrastructure for higher education in prison.

Findings

When we asked higher education in prison program staff and other stakeholders to describe the pipeline through which data on students who are incarcerated flows, we quickly learned that there was no single or straightforward answer. This was partly because stakeholders—depending on their roles and institutional positions—often had visibility into only one segment of the pipeline and limited insight into how data moved beyond their purview. But even when we attempted to piece these perspectives together, it became clear that there is no fixed or uniform system. Instead, data pathways vary significantly across programs and states. In many cases, individual programs have developed their own workarounds, both formal and informal, to collect and share at least some of the data they need to serve students and meet institutional or policy requirements.

Programs and their host institutions vary widely in their ability to access,

share, and use data. Some operate under formal memoranda of understanding (MOUs) or data-sharing agreements, while others rely on informal relationships or face limitations due to state policy, institutional silos, or corrections agency restrictions. Many programs lack access to basic comparison data to students enrolled on the main campus, and their institutions struggle to access and integrate DOC-provided information into their data systems and processes. Understanding how these roles and relationships function within each context is critical: it reveals how stakeholders can come together to support data infrastructure for higher education in prison, where partnerships might be developed, and where barriers or breakdowns occur.

This variation also underscores a key challenge: it is difficult to offer a single, prescriptive model for building or mapping data systems in higher education in prison. Existing practices are highly context-dependent—shaped by state policies, institutional capacities, and the nature of relationships between education and corrections partners. Yet despite this variability, stakeholders widely acknowledge that current systems are often unsustainable and that more coordinated, scalable solutions are needed to improve data infrastructure across the field.

While data pipelines differ across states, and sometimes across institutions within the same state, a few shared priorities emerged across our conversations. During the design jam, for instance, we asked participants to rank the most pressing needs to improve student data management in their state. Integrating student information systems in order to centralize student information across programs and institutions emerged as a top priority, by a wide margin. In a later exercise, participants were asked to sketch an idealized map of how student data should flow between relevant actors (e.g., the higher education in prison program, their host institution, correctional partners, etc.). Nearly all of these diagrams emphasized the importance of centralized data management, although the specific structure of that centralized system varied significantly.

In the sections that follow, we examine key barriers and roadblocks within the higher education in prison data ecosystem. While challenges exist at multiple levels, our analysis focuses on the day-to-day realities faced by those working closest to incarcerated students: program staff and administrators. These include limited coordination with institutional and correctional partners, lack of staff capacity and training, and concerns

around student privacy. Where possible, we also highlight promising formal and informal strategies programs have developed to track student data and support accountability under challenging conditions.

Lack of Coordination in Data Sharing and Management

Between Higher Education in Prison Programs and Host Institutions

When asked about the challenges of navigating the existing data infrastructure for higher education in prison, many participants, particularly program directors, described difficulties coordinating across key stakeholders. Most often, they pointed to challenges in working with their own host institutions, with several participants referring explicitly to the presence of "silos" between their programs and the broader institution.

In response to these limitations, most of the programs we spoke with reported developing informal databases to collect and manage student data they considered essential for tracking enrollment, academic progress, demographics, and carceral facility assignments—data that could not easily be collected or accessed through the institution's student information system. In addition to academic metrics, some programs also tracked qualitative data (e.g., student progress notes or feedback) and other quantitative data such as reentry status, post-completion outcomes, and data on student transfers and release dates via communications with the department of corrections (DOC). In many cases, these data were collected and maintained manually. Where carceral facilities imposed strict technology restrictions, programs relied on paper forms that were later transcribed into spreadsheets, Microsoft Access databases, or the host institution's student information system.

While informal data management systems often fill critical gaps for programmatic data collection, they come with significant limitations. Their effectiveness, security, and scope are constrained, especially when program administrators lack the time and technical expertise to manage complex data systems—issues that are compounded by the level of manual data entry that is often required. For example, one participant described challenges tracking data on advisor interactions with students.

Since advisors could not bring computers into the carceral facilities when they meet with students, any information about those sessions had to be captured on paper. Given the limited capacity of their team to undertake the administrative work of transcribing and uploading that information, the program could only track how often advisors met with students, but meeting materials were not incorporated into any database. In light of this, the participant doubted their ability to provide detailed data on students' access to student services—a required metric in the Best Interest Determination phase of the Prison Education Program approval process.

The siloed nature of these informal data systems also mean that programs are unable to benefit from the analytical capacity and data infrastructure available in other departments at their host institution, such as institutional research (IR) offices. Staff in IR offices at several colleges and universities operating higher education in prison programs reported having little visibility into or involvement with those programs' data management and reporting, despite being responsible for analyzing data on all affiliated students.

Some programs described efforts to integrate their data into broader institutional reporting, but lamented that progress has been slow. In a few cases, students who are incarcerated had only recently been included in overall enrollment figures and remained excluded from other key student success metrics, limiting the institution's ability to analyze disparities in outcomes and services between students who are incarcerated and those enrolled on campus.

While a lack of data integration presents significant challenges to higher education in prison programs, it is important to recognize that deeper engagement with the host institution can sometimes feel fraught for program administrators. One program director, for example, expressed concern that their program might be perceived as a strain on institutional resources. This dynamic can a program administrator to intentionally limit their interactions with central offices, even when greater collaboration could improve data infrastructure and support long-term program sustainability.

This disconnect, combined with a reliance on individual staff members for data management, increases the likelihood of losing institutional knowledge when those individuals leave their positions—further complicating efforts to ensure data consistency and continuity. Data silos at the institutional level are often seen as operational inefficiencies, but

they also reflect deeper structural issues: namely, underdeveloped relationships between higher education in prison programs and the institutions in which they are housed.

Between Higher Education in Prison Programs and Departments of Corrections

In addition to their relationship with host institutions, nearly all program directors we interviewed described their data partnerships with departments of corrections (DOCs) as particularly challenging. Part of this difficulty, several participants explained, stems from the opaque decision-making processes that are characteristic of correctional institutions. For example, while colleges typically retain control over enrollment selection, eligibility for participation is often determined by DOC staff, based on policies and procedures that are rarely transparent. Without a clear understanding of how these decisions are made, higher education programs struggle to assess whether prospective students within a carceral setting have equal access to their offerings.

Some programs also reported issues with receiving timely updates from their DOC partners regarding student transfers or release dates. Some DOCs provide data through secure transfer systems, but others physically mail data on CDs or share data through email, and the frequency in which these data are shared can be inconsistent or significantly delayed. In response, we heard from programs that have turned to third-party tools like the Education Justice Tracker to scrape this information from public online records.[16] Despite filling a needed gap in data availability, the Education Justice Tracker is not a complete substitute for DOC involvement: unlike correctional agencies, it cannot provide access to historical data on facility transfers or other key metrics that programs need for planning and evaluation. Without timely and accurate data on student transfers and release dates, programs are unable to fully interpret completion and graduation rates, identify the reasons students may be unable to complete their degrees, or implement interventions to address these barriers.

Fostering stronger collaboration around data management and sharing

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[16] Emily Sanders Hopkins, "Tracker Promotes Consistent Learning for Incarcerated Students," Cornell College of Agriculture and Life Sciences, October 18, 2021, https://cals.cornell.edu/news/2021/10/tracker-promotes-consistent-learning-for-incarcerated-students.

between higher education programs and DOCs is essential for fixing the fractured data pipeline, and data sharing agreements or memoranda of understanding (MOUs) are critical tools in this work. One DOC representative discussed how they see MOUs as a key step in supporting higher education programming in their facilities. Through well-crafted MOUs, DOCs and higher education institutions can align on the information needed to assess if they are providing the best educational experience possible for their students. Crafting these agreements, however, requires an act of balance to ensure parties have clear expectations but are not overburdened by unnecessary bureaucracy. As the same representative noted, MOUs that are too lengthy can leave partners mired in minutiae and even signal a lack of trust or flexibility in the relationship. Therefore, these documents must be jointly constructed by all involved parties and take into account both their shared goals and the practicality of the measures included.

New models for improved collaboration between DOCs and institutions are beginning to emerge. One DOC representative described how their agency has been working in close partnership with the higher education institutions operating in their facilities, as well as an institutional accrediting agency, to ensure programs applying for Prison Education Program status receive clear directions and consistent feedback in the lead-up to the Best Interest Determination (BID). Under this model, the DOC a) supplies programs with a rubric aligned with the BID to ensure programs understand the expectations the DOC has set; b) conducts site visits and hold conversations at the six month and one year mark with key institutional and program administrators; and c) fields surveys to gather feedback from various stakeholders, including instructors, to inform its evaluation of the program's performance. The DOC developed these steps, the DOC representative explained, to give programs an opportunity to course correct their practices, if necessary, in the two years leading up to the BID, which ensures programs meet their DOC's expectations and can secure full Prison Education Program status.

At the State and National Levels

In some cases, efforts to improve data sharing and standardization extend beyond individual higher education in prison programs, their host institutions, and DOC partners to encompass broader, statewide coordination. These efforts aim to build more cohesive systems for tracking students across institutions and facilities, comparing outcomes across programs, and monitoring post-release progress. The benefits of

such coordination are clear: improved visibility into student movement, identification of barriers and promising practices, and smoother transitions between programs both during incarceration and after release. However, the challenges are significant—beginning with the need to establish formal, statewide data-sharing agreements.

Consortia for higher education in prison are a growing approach to coordinating at state or regional levels as well as by institution characteristics. These organizations have been at the forefront of efforts to coordinate across stakeholders however, working across multiple institutions means they also face unique challenges. One participant involved in their state's consortium explained that, while their organization plays a coordinating role, it has no legal or governing authority over participating institutions. As a result, data sharing is often voluntary and inconsistent. In one case, they noted, there was no clear mechanism for data sharing within the state's community college system, making it difficult for institutions to understand their own state context in terms of student enrollment, course completion, and credential attainment. At the time of the interview, their consortium was still working to facilitate greater cooperation across institutions in order to support more seamless student transfers, improve outcome tracking post-release, and prevent disruptions in academic progress when students are transferred to facilities served by different colleges. Establishing clear, efficient data-sharing practices among consortia member institutions is a foundational step toward building such a system.

Leveraging state longitudinal data systems for improved data management was also a topic of conversation during both interviews and the design jam. Many states currently operate, or are in the process of implementing, a system to capture education and workforce data. At the design jam, participants discussed how these systems could potentially also be used to centralize data related to higher education in prison, but noted that coordinated engagement with state agencies as well as policy adjustments would be needed to ensure students who are incarcerated or formerly incarcerated are accurately represented within these systems.

Several experts we spoke with also commented on the challenges of coordinating and sharing data with national systems such as the Integrated Postsecondary Education Data System (IPEDS) and the National Student Clearinghouse (NSC). These challenges, they explained, stem from privacy concerns, the need for data de-identification, and

institutional reluctance to share sensitive information. One national expert recalled that during the Second Chance Pell pilot, data from participating sites were collected by financial aid offices and reported directly to the US Department of Education, bypassing IPEDS reporting—likely due to the experimental nature of the initiative.

Over the past several years, there have been many discussions among the policy and research communities to incorporate data on students who are incarcerated into IPEDS. In October 2021, the IPEDS Technical Review Panel, a peer review process for IPEDS-related plans and products hosted by RTI International, convened to examine the implications of Pell Grant reinstatement for incarcerated students and explore how IPEDS might adapt to better capture prison-based postsecondary education.[17] Panelists highlighted the lack of comprehensive national data on incarcerated students and noted that current reporting practices often mask important differences in student demographics, access to resources, and academic outcomes. They discussed a range of challenges—such as FAFSA completion barriers, inconsistent tracking across prison transfers, and limited access to support services—that differentiate the experiences of incarcerated students from traditional student populations. While panelists supported including all credit-bearing students who are incarcerated in IPEDS reporting, they raised ethical concerns about disaggregating data by race or gender due to privacy risks for this particular student population. Suggestions included adding a yes/no flag to identify institutions enrolling incarcerated students and clarifying IPEDS instructions to explicitly include students enrolled at prison locations if they are enrolled in credit-bearing courses.

Building on those conversations, the 2023–24 IPEDS reporting cycle introduced several key changes to improve clarity and consistency regarding incarcerated students.[18] Most notably, IPEDS updated its instructions and FAQs to confirm that all students enrolled for credit—including those at off-campus prison locations—must be reported across relevant components such as Institutional Characteristics, Fall Enrollment, Completions, Graduation Rates, and Outcome Measures. However,

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[17] "Incarcerated Students and Second Chance Pell: Data Collection Considerations," IPEDS Technical Review Panel, October 26, 2021, Retrieved from https://ipedstrp.rti.org/.
[18] "Changes to the IPEDS Data Collection Starting in 2023-24," National Center for Educational Statistics, IPEDS, Retrieved from https://nces.ed.gov/ipeds/report-your-data/archived-changes/2023-24.

students participating in the Second Chance Pell Experimental Sites Initiative were to be excluded from institutions' reporting, consistent with prior guidance for experimental site populations. These updates marked an important step toward more consistent data collection, aligning with federal policy changes that restored Pell Grant eligibility for incarcerated students and signaled the growing recognition of prison education as an integral part of the higher education landscape.

> In the absence of standardized reporting requirements or infrastructure, efforts to build a cohesive national picture of higher education in prison remain fragmented and inconsistent.

Today, there is ongoing discussion within the field about the utility of aggregating data on students who are incarcerated for state-level and national-level reporting. However, institutions are often hesitant to share these data, citing the additional administrative burden and the lack of consensus around standardized data structures. Some interviewees suggested the creation of a national data clearinghouse specifically for students who are incarcerated, but noted unresolved questions about who would manage and govern the data. In the absence of standardized reporting requirements or infrastructure, efforts to build a cohesive national picture of higher education in prison remain fragmented and inconsistent.

Data Privacy

In addition to coordination challenges, concerns around data privacy emerged as one of the most pressing and complex issues facing higher education in prison programs. Many of the program leaders and experts we interviewed underscored that protecting student privacy is not only a legal obligation but also a moral imperative, especially given the heightened risks associated with disclosing students' incarceration status.

Several program directors noted that data privacy had become a growing area of focus in their work. Common strategies include limiting access to personally identifiable information (PII), using secure file transfer systems, and training staff on data handling protocols. These efforts are motivated by a shared belief that while expanding data collection can support

program improvement, it also increases the risk of harm if not carefully managed.

Using identifiers to indicate students' enrollment in higher education in prison programs (as opposed to programs offered on the traditional campus) is essential to making students' experiences and outcomes visible within institutions, yet increased visibility can carry unintended consequences. If students' incarceration status is easily identifiable, students may face stigma, be treated differently by staff, or be denied access to campus services. One interviewee noted that institutional staff might misinterpret this information or use it in ways that disadvantage students, even unintentionally.

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Across institutions, we observed varying and inconsistent practices for identifying students who are incarcerated in institutional systems. Some programs use unique course numbers to designate classes taught in correctional facilities, while others assign distinct campus codes for carceral sites, the latter of which seems aligned with emerging requirements under the Prison Education Program approval process. For example, under 34 CFR § 602.24(f)(1), accrediting agencies must apply the definitions of "branch campus" and "additional location," requiring programs to distinguish locations offering prison education programs in formal ways.

The challenge lies not only in how students' incarceration status is tagged, but also in who has access to interpret those tags. For instance, a record might indicate that a student is associated with a campus code like "PRI" (prison) instead of "MAI" (main campus), but access to the "codebook" that defines such terms is often restricted to a few administrators. While this protects privacy, it can also hinder access to valuable student support services. Some systems restrict data visibility unless students explicitly authorize the release of the information, which can be empowering, but also limits the institution's ability to proactively provide services.

Given these complexities, several national experts and technical

assistance providers are working with higher education in prison programs to identify best practices for managing sensitive data. Most programs rely on the Family Educational Rights and Privacy Act (FERPA) to govern data protections. However, state DOCs follow their own privacy policies, which may diverge in terminology, protocol, and intent. This misalignment between institutions and DOCs can lead to frustration, with each side feeling that the other is either withholding needed information or demanding access to data that cannot be shared. In many cases, students end up caught in the middle, being required to sign broad waivers in hopes of accessing opportunities, but still receiving incomplete support.

One institutional research (IR) staff member shared how recent federal changes have introduced new privacy hurdles. Under the FAFSA simplification process, students' family income data are now provided directly from the IRS. As a result, there are heightened data security and confidentiality rules that limit the number of staff who can access students' income data and other derived measures. This has created new silos within institutions, limiting collaboration and making cross-departmental data analysis more difficult. Even before FAFSA simplification, many institutions had already instituted stricter rules about sharing detailed student data with external partners, requiring signed waivers from students, formal MOUs, and coordination across multiple offices. This is an especially tall order for institutions with poor internal communication.

Some program leaders also questioned the necessity of collecting certain data points such as dates of incarceration or release, and whether they should be tied to a student's academic record at all. The benefits of these data are that they contextualize the students' academic experiences, but the concern is that information about sentence length or offense could bias institutional staff, further stigmatizing students or limiting their access to educational resources.

Ultimately, the conversation around data privacy in higher education in prison is not just about compliance, it is about trust, purpose, and power. Without clear agreements, shared definitions, and mutual respect among institutions, DOCs, and programs, data sharing can become adversarial. And much of the risk is borne by the students themselves. But with thoughtful coordination and safeguards, institutions can responsibly use data to support students who are incarcerated while protecting their

dignity and rights.

Staff Capacity and Training

Several program directors we interviewed identified limited resources and a shortage of trained personnel as significant barriers to effectively collecting, managing, and analyzing student data. This capacity gap is particularly concerning given the sensitive nature of data on students who are incarcerated, which demands advanced analytical skills and specialized tools. One interviewee reported that their program had only recently hired a full-time data analyst; prior to that, three existing program staff members were devoting up to 40 percent of their time to data collection, cleaning, and analysis—tasks that were not part of their primary responsibilities. Most of these programs lack the resources needed to hire dedicated data analysis staff, further straining their ability to contribute to an effective data infrastructure. As we previously discussed, many have an underdeveloped relationship with their host institution, leaving programs responsible for their data management without the aid of other offices at the institution, such as institutional research. Dismantling siloes between higher education in prison programs and their host institutions is a critical way to expand capacity and ensure data are managed by staff with requisite technical expertise.

Departments of corrections often face similar capacity challenges, particularly as they assume increased responsibilities for collecting and sharing incarcerated student data during the Best Interest Determination process. One DOC representative described their ongoing efforts to upgrade internal data systems in preparation for this process. This involved working closely with existing technology vendors to enhance their work-management software and improving data-sharing capabilities. The updated software promised significant efficiencies in managing student records and creating detailed rubrics for performance evaluation, among other tasks. However, they continued, staff needed additional training for the department to fully leverage its new capabilities.

Conclusion and Next Steps

With approximately 400 higher education in prison programs currently serving students who are incarcerated across the United States, strengthening data infrastructure is critical. Robust data systems are essential to reliably track enrollment and outcomes, and to ensure these students do not remain invisible within the broader landscape of American higher education. Both integrating this population into institutional data frameworks and adapting those systems to account for their distinct learning environments is key to advancing our understanding of educational quality and equity within higher education in prison programs. The recent reinstatement of Pell Grant eligibility for students who are incarcerated has made addressing gaps in the existing data pipeline particularly urgent. Enrollment in prison education programs is expected to grow further, and programs will face increasingly stringent data requirements to qualify for federal aid.

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This report summarizes findings from the first phase of a three-year project aimed at strengthening data infrastructure in higher education in prison. We examined key challenges facing the field, beginning with limited coordination and a lack of standardization among the primary stakeholders in the data pipeline: higher education in prison programs, their host institutions, departments of corrections, and state and federal education agencies. We also underscored the need, frequently raised by participants, for increased investment in staff training and capacity. Many stakeholders are already operating with limited resources, making it difficult to dedicate the time and expertise required to improve data systems. Finally, while emphasizing the benefits of more robust data collection on students who are incarcerated, we also highlighted its risks—particularly the potential for increased visibility to lead to stigma or discrimination.

In addition to persistent challenges, this report also documents promising practices, as higher education in prison programs and their partners become increasingly aware of the importance of robust data collection. Field leaders such as SUNY's Office of Higher Education in Prison have developed some of the most advanced data infrastructure to date, offering a potential model for others. At the same time, individual programs across the country are working to build better pipelines for their data, starting with creating new sharing agreements and partnerships from the ground up. These efforts illustrate that there is no single blueprint for building effective data infrastructure. Instead, programs and consortia must adapt their approaches to fit the specific higher education and correctional landscapes in their state, as well as the mix of institutions involved in providing prison education.

Looking Forward

Building on our national landscape analysis and foundational activities, Ithaka S+R is now launching the next phase of work in two regions. In Mississippi, through a collaboration with the Mississippi Consortium for Higher Education in Prison (MCHEP), we are focusing on strengthening the state's data infrastructure for higher education in prison. Following an assessment of the existing higher education in prison data pipeline, Ithaka S+R will support a pilot cohort of programs and systems to implement targeted solutions—from defining shared metrics and streamlining reporting processes to developing data-sharing protocols and designing evaluation tools. Our goal is to equip MCHEP and its partners with practical tools and replicable strategies that support continuous improvement, while helping to position Mississippi as a national leader in evidence-based, student-centered prison education.

In New England, we are collaborating with the New England Prison Education Collaborative (NEPEC), an initiative of the New England Board of Higher Education (NEBHE) through its new Accelerator Grant initiative. This initiative convenes a cohort of five higher education institution grantees to co-develop meaningful and measurable success metrics, align evaluation practices with evolving federal requirements, and provide tailored technical assistance throughout the grant period. Through a combination of workshops, mid-grant reviews, and final debrief sessions, we will support participating institutions in building strong frameworks for

tracking progress, assessing outcomes, and fostering shared learning across the region.

The work in Mississippi and New England is mutually reinforcing, with lessons learned in one context informing strategies in the other. Together these efforts will contribute to a broader set of tools, templates, and playbooks for strengthening data capacity nationwide. The final phase of this project will synthesize insights from both regions, refine a prospectus for potential higher education in prison data services and tools, and share findings with the community through a published playbook. The goal is to lay the groundwork for a sustainable data infrastructure that enhances program quality, supports evidence-based decision-making, and strengthens the long-term impact of higher education in prison programs.