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**THE RIGHT PREPOSITION: OBJECTIFYING THE RELATIONSHIP
BETWEEN PRISON POSTSECONDARY EDUCATION PROGRAMS,
DEPARTMENTS OF CORRECTION, AND ACADEMIC
INSTITUTIONS**

JENIFER DREW*

I. INTRODUCTION: BALANCE AND COMPROMISE

During my thirteen years of association with the Boston University (BU) Prison Education Program (BU Program),¹ first as professor, then administrator, and now again as professor, my focus has been on the problems and successes unique to the BU Program. I have worked as an outside contractor with both BU and the Massachusetts Department of Correction (DOC) and individual prison administrations to bring the benefits of postsecondary liberal arts education to our students. The BU Program has, since 1972, granted over four hundred Bachelor's degrees to incarcerated men and women in classes on-site.² During that time, the program has grown and stabilized, currently with an enrollment of 130 students; eighty-five men and forty-five women in the two Massachusetts state prisons in which it operates.³ Students are offered full scholarships from BU, for which they must maintain a 2.7 GPA and complete graduation requirements parallel to those required of on-campus students.⁴ Faculty are paid a discounted adjunct rate by BU, and recruited from BU and surrounding colleges and universities. During my tenure the program, situated in each DOC school under the supervision of the principal, was administered for BU by one person who visited weekly or bi-

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1. *See Prison Education Program*, BOS. UNIV., <http://www.bu.edu/pep/> (last visited May 22, 2014).

2. *Id.*

3. *Id.*

4. *Id.*

monthly. The locus of the program is at BU; as administrator, I was assisted by incarcerated BU graduates who served as clerks for each program, on-site.

Most of the time, those of us who administer prison education programs do so from our own backyard, struggling with problems we experience as unique. The enormous value of the annual National Conference on Higher Education in Prison is in the knowledge that, while prison postsecondary education programs vary, their administrators share much in common. At these conferences, we form community, united in our belief in the redemptive and transformative power of prison education. Beyond our unifying core, however, our programs vary in origin, structure, and working relationships with the institutions—correctional and educational—we work with, at, between, of, and beside.

This brief essay suggests that it can be useful to identify the “prepositional relationship” of our programs *vis á vis* our partners in this work—the Funding Agency (FA), the Department of Correction (DOC), and the Academic Institution (AI). With a few exceptions, our relationships with the outside funding agency, hard-fought and carefully managed, are not the subject of this essay. That relationship is fairly clear: does prison education fulfill the mission of the Funding Agency, and if so, how much is the FA willing to offer in support of our program? In fact, funders can be our biggest boosters, as we negotiate with the other two organizations, each with an agenda independent of ours. The truth is that while we need a relationship with all three in order to fulfill our mission, neither the DOC nor the AI need us to fulfill theirs.

The purpose of this essay is threefold: First, to provide information for individuals or institutions who wish to start a prison education program—to discover which “prepositional relationship” might work best in their setting. Second, to introduce readers to a variety of prison postsecondary education programs models, including some of the barriers and advantages of each. And finally, to permit current administrators of prison postsecondary education programs to objectify the structural elements of their work, elements they can access to the advantage of their students, as well as elements that can make their work sometimes frustrating even as it is rewarding.

II. DEFINING THE PREPOSITIONAL RELATIONSHIP

A preposition describes the relationship between two things.⁵ In the case of prison education, administrators are well advised to pay attention to prepositions. That is, the success of our work is a function of our prepositional relationships with each of our partners. Such prepositional relationships among the Prison Postsecondary Education Program (PPEP), the DOC, and the AI often begin in *ad hoc* fashion, opportunistically inspired by charisma and

5. See WEBSTER'S NINTH NEW COLLEGIATE DICTIONARY 782 (9th ed. 1988).

passion, foresight and commitment—and then they evolve. They become institutionalized in order to be sustainable. PPEPs gain and lose ground as personnel at the DOC and the AI change and politics shift. From the point of view of all three entities, prepositional relationships are rarely ideal, are more often hammered out, are a function of compromise. Perspectives differ one from another, and change over time.

For example, BU's program was the inspiration of a passionate English professor who forcefully gained the ear of the then university president. Small and informal at first, the program has become a "remote campus" adhering to the same requirements as other satellite campuses. There has been, however, fluctuation in the support for the program, beyond BU's steadfast monetary contribution, total since elimination of prisoners' Pell Grant eligibility.⁶ Recently, however, BU determined that with tuition increases, and threatened budget cuts on campus, it was unwise to offer the traditional summer classes in the prison or to continue to provide scholarships for former prison students as they completed their studies on campus from pre-release centers. Such choices may have been influenced not by the economy alone, but also by a cultural shift toward the punitive.

The perspective of the DOC, while it endorses educational opportunity, does not generally extend to postsecondary liberal arts education. DOC educational programs operate within the DOC school, under the school principal, the person in charge of programming and treatment, the institutional superintendent, the deputy commissioner, and so on, in strict hierarchical fashion. Postsecondary liberal arts education programs fall outside that hierarchy, yet are part of the educational function of the institution. DOC concerns of security and control inform many of its own educational decisions and play out in their response to an outside PPEP, as well.⁷ For example, in the BU Program, professors are now forbidden to bring in films rated anything but PG or PG-13, thereby eliminating many of the films professors use on campus to strengthen their pedagogy. In courses on race and inequality, films that illustrate crucial points in history—the Jim Crow era, for one—are not permitted for fear they will aggravate racial tensions in the general population,

6. Violent Crime Control and Law Enforcement Act of 1994 § 20411, 20 U.S.C. § 1070a(b)(6) (2012).

7. *See generally* BOS. UNIV. PRISON EDUC. PROGRAM, EXCERPTS FROM THE MASSACHUSETTS DEPARTMENT OF CORRECTIONS VOLUNTEER HANDBOOK (2007), available at <http://www.bu.edu/pep/pdfs/volunteerhandbook.pdf>; COMMONWEALTH OF MASS., DEP'T OF CORR., EMPLOYEE RULES AND REGULATIONS (2013) [hereinafter EMPLOYEE RULES], available at <http://www.mass.gov/eopss/docs/doc/policies/220.pdf>; *Massachusetts Department of Corrections*, MASS. EXEC. OFF. OF PUB. SAFETY & SEC., <http://www.mass.gov/eopss/agencies/doc/> (last visited May 22, 2014). Many of the regulations are based on personal knowledge from working within the prison and are not physically included in some of the rules and handbooks.

despite no evidence of this in the past when these films were shown in prison classes.

The perspective of AI's, and the academicians socialized by them, endorses professional autonomy and students' freedom of thought, speech, and action. These values and practices can be antithetical to the DOC's concerns for security and cannot be extinguished by even the most thorough DOC orientation. The best the academic and the corrections professional can hope for is a sort of *detente* in which each recognizes the other's priorities and does its best to accommodate and comply. In case where perspectives conflict, it is the responsibility of the PPEP to recognize that they are only able to do their work at the invitation of the DOC—an invitation which can be revoked.

For example, while the DOC is pleased to have the BU PPEP, they are clear that it is a privilege for volunteers to enter the prison, and that volunteer professors must remain mindful of the environment.⁸ Serious DOC volunteer infractions concern "boundary issues," such as advocating for our students, as we might on campus, in a letter of recommendation. Parole hearings loom large in the lives of our students, who frequently ask for a letter of recommendation for their packet. Such a letter is the essence of advocacy, and therefore risks the impression that "boundary issues" have been transgressed. Thus, in order to fulfill our function as educators, the BU PPEP has devised a compromise whereby we may enter something into the prison student's parole package that speaks to his or her performance as a student. The strictures include: no professor can write such a letter, only the administrator; and, that administrator cannot express an opinion about the student's worthiness for parole, or as a rehabilitated person. The letter, essentially a verbal rendition of the student's transcript on letterhead, must go to the commissioner for review and approval. It can only be submitted after the prisoner has been given a definite date for the parole hearing and cannot be given to the prisoner. Prisons seek security and control, while educators seek autonomy and freedom. Consequently, the letters that appear in students' parole packets are not as full-throated as we might like them to be; they are the result of a compromise.

Those who administer a prison postsecondary education program are wise to objectify their "prepositional" relationship with the DOC and the AI that grants their students credit and to locate sources of potential conflict in the structural arrangements surrounding our work on behalf of students. On these relationships rests the continued success of our programs and the too often overlooked emotional well-being of those who must do the compromising in order to serve our students. It is no small feat to corral the interests of such

8. See generally BOS. UNIV. PRISON EDUC. PROGRAM, *supra* note 7. Teachers are technically volunteers, but our involvement is more extensive than most volunteers, so rules applying to employees sometimes apply to us, and we must sign forms indicating we will comply in order to be allowed to volunteer.

distinct, sometimes opposing, organizations on behalf of our students. Whatever can ease the burden—if only the awareness of frustrations borne in common and a function of external and structural factors—is worth exploring.

What follows then is a partial list of the various prepositional relationships between a Prison Postsecondary Education Program, the Department of Corrections, and the Academic Institution—with advantages and disadvantages of each briefly noted. The range of program models discussed is extensive, yet, not exhaustive of the programs that currently exist throughout the United States. Harvard University's Prison Studies Project provides a more exhaustive directory of the programs currently known throughout the country.⁹

III. INTO

In this prepositional relationship, the PPEP enters *into* the DOC on a course-by-course basis. The DOC permits students to enroll in one or more courses while the PPEP conducts a thorough orientation before professors set foot into the correctional setting. Such a relationship characterizes the Inside-Out Educational Exchange, coordinated by Temple University,¹⁰ and flourishing at sites nationwide. The Inside-Out Prison Exchange Program affords opportunities for men and women, free and incarcerated, to study together and have transformative learning experiences that emphasize collaboration and dialogue. While Inside-Out enters into the correctional system one course at a time, its efforts are complicated by the presence of campus students who come into the prison with professors. To address that complexity, Inside-Out takes full responsibility for thorough, week-long training workshops. In contrast to the abbreviated orientations of both BU and the DOC, followed by the on-the-job training of BU professors, the Inside-Out training is enviable. It acknowledges the security concerns of the correctional setting as well as the pedagogical concerns of mixing inside and outside students in a class. This level of training is undoubtedly one reason the program has been so successful in correctional settings across the country.

In programs with an *into* relationship, student and program success is measured by individual classes, which while they can accumulate, do not necessarily point to graduation, which simplifies the relationship with the AI. In contrast, success is measured in the BU Program in graduation rates, and the multitude of anecdotal “success stories” of graduates in the community. Disadvantages of the *into* relationship, if they can be called that, are that the PPEP does not achieve the satisfaction of graduating students, seeing them

9. See *Directory*, PRISON STUD. PROJECT, <http://prisonstudiesproject.org/directory/> (last visited May 22, 2014).

10. For more information about the Inside-Out Center, see *About Us*, TEMP. UNIV. COLL. OF LIBERAL ARTS, <http://www.insideoutcenter.org/about-us.html> (last visited May 22, 2014).

move on to graduate school or re-entering their communities with completed college degrees.

IV. OF

In rare cases, the PPEP is an entirely coordinated effort, a part of both the DOC and the AI. This is the case in Indiana's Correctional Education Program,¹¹ in which the DOC collaborates with several AI's to bring postsecondary education to its prisoners. The benefits are obvious: broad-based support for the concept of educating prisoners and facilitated implementation.

No one AI need bear the burden of coordinating entry into the prison and seeking approval for curriculum; the programs operate in several prisons run by the AI in greatest proximity to the prison. The program is state-funded, relieving a burden from program administrators.¹² However, that dependence may render even successful PPEP's vulnerable. The Indiana program, despite considerable evidence-based proof of success heralded in a recent issue of the *Journal of Correctional Education*,¹³ remains dependent on state funding. Supported by state funds, a program may become a casualty of state budget cuts despite obvious and empirically documented success.¹⁴

V. BESIDE

Not without its difficulties, this model offers an unusual degree of independence to both the AI and DOC, as they work *beside* one another in relative autonomy. The curriculum of the PPEP can be designed specifically to be relevant to incarcerated students. An AI, once convinced of the soundness of the courses offered, agrees to offer credit; the AI, in turn, is paid tuition by the PPEP. Such is the circumstance of the Hudson Link for Higher Education in Prison, which works in facilities throughout New York.¹⁵ Hudson Link "provides college education, life skills, and re-entry support to incarcerated men and women" to help them make a positive impact on their own lives, families, and communities.¹⁶

11. See *Indiana Justice Model - Programs Component*, IND. DEP'T OF CORR., <http://www.in.gov/idoc/2902.htm> (last visited May 22, 2014).

12. John Nally et al., *An Evaluation of the Effect of Correctional Education Programs on Post-Release Recidivism and Employment: An Empirical Study in Indiana*, 63(1) J. CORR. EDUC. 69, 71 (2012).

13. *Id.* at 70-71.

14. *Id.* at 70.

15. For more information regarding the Hudson Link for Higher Education in Prison, see HUDSON LINK FOR HIGHER EDUC. IN PRISON, <http://www.hudsonlink.org> (last visited May 22, 2014).

16. *Philosophy*, HUDSON LINK FOR HIGHER EDUC. IN PRISON, <http://www.hudsonlink.org/Philosophy> (last visited May 22, 2014).

Hudson Link works *beside* the DOC and the AI. It achieves a level of autonomy by paying tuition to multiple AI's that provide coursework to students.¹⁷ The former commissioner of the New York State Department of Corrections and Community Supervision, Brian Fischer, is on Hudson Link's board of directors.¹⁸ Hudson Link fortifies its position through public exposure, for example, a documentary entitled "Zero Percent," presented by HBO as "Sing Sing University,"¹⁹ and celebrity endorsements from the well-known figures, such as Warren Buffett and Harry Belafonte.²⁰ Perhaps most important is the independent nature of the curriculum, designed by the program administrator with the specific educational needs of prisoners as the starting point.²¹

Together, these structural arrangements provide an effective buffer for the PPEP against interference from the DOC or the AI. Because of its relative independence, it can extend its program to include re-entry services for its alumni inside and in the community. The cost of this relative freedom is financial, a burden which must be shouldered by the PPEP; the search for funds is a constant for nearly every PPEP.²² Additionally, the commitment of the AI may fluctuate; while it may grant college credit, and there may be champions at the AI, the support for the program can vary with leadership and not be as broad-based as might be ideal.

VI. AT

Professors from the AI, or several AI's, serve as volunteers *at* a prison, and the program's grant-funded staff works out of space provided by the prison. Being in residence has obvious benefits: the active involvement of the prisoners in policy and opportunities for hands-on innovation and advocacy by a full-fledged staff. San Quentin's Prison University Project (PUP) reflects this

17. For information regarding Hudson Link's educational partners, see *Education*, HUDSON LINK FOR HIGHER EDUC. IN PRISON, <http://www.hudsonlink.org/programs-partners/programs/education> (last visited May 22, 2014).

18. *Brian Fischer, Board Member*, HUDSON LINK FOR HIGHER EDUC. IN PRISON, <http://www.hudsonlink.org/about/leadership/brian-fischer-board-member> (last visited May 22, 2014).

19. *Zero Percent – a Hudson Link Documentary*, HUDSON LINK FOR HIGHER EDUC. IN PRISON, http://www.hudsonlink.org/news_events/zero-percent-hudson-link-documentary (last visited May 22, 2014) (describing the content of the documentary).

20. Peter Applebome, *Our Towns: After Graduation, Back to the Sing Sing Cellblock, With Hope*, N.Y. TIMES, June 7, 2010, at A16.

21. HUDSON LINK FOR HIGHER EDUC., *supra* note 15.

22. HUDSON LINK HIGHER EDUC., TRANSFORMING LIVES THROUGH EDUCATION 3 (2011), available at http://www.hudsonlink.org/sites/default/files/Annual_Reports/2011-Hudson-Link-Annual-Report.pdf.

model.²³ PUP's mission is to "create a replicable model for such programs; and to stimulate public awareness and meaningful dialogue about higher education and criminal justice in California."²⁴

California's PUP and Illinois' Education Justice Project (IEJP) also enjoy considerable latitude in publishing powerful newsletters, releasing photographs of prison students to the press, and using other forms of public media to educate the public and realize their mission.²⁵ The IEJP also involves prisoners' family members at gatherings in Chicago's public libraries, during which IEJP professors show off the work of their incarcerated students.²⁶ Images of such efforts change public opinion and help garner financial support in donations and successful grant applications.

Other programs, of which the BU Program is one, are severely restricted in the use of public media; the DOC and BU agree that, in Massachusetts, to put too public a face on prison education would cause a public outcry, with the implication that the public outcry will prompt the DOC's reluctant closure of the program; the idea of proactively using public media to educate the public about prison education is rejected. The BU Program is financially secure through the university's generosity. However, the prohibition on writing, speaking, and showing images of prison education students means that unlike PUP and IEJP, the BU Program remains "under the radar" and cannot serve as a corrective to public impressions of incarcerated people. The chief disadvantage of this *at* relationship is the ongoing need for funding to support the level of staffing necessary to run a program *at* the prison, but not of the prison or of the AI.

VII. BETWEEN

When the administration of a PPEP falls *between* the purviews of both the DOC and the AI, but is dependent on the goodwill of both, the relationship can be complex. Such was the case of the Boston University Prison Education

23. For more information about the Prison University Project at San Quentin, see PRISON UNIV. PROJECT, <http://www.prisonuniversityproject.org> (last visited May 22, 2014).

24. *About Us*, PRISON UNIV. PROJECT, <http://www.prisonuniversityproject.org/about-us> (last visited May 22, 2014).

25. See *Publications*, PRISON UNIV. PROJECT, <http://www.prisonuniversityproject.org/publications> (last visited May 22, 2014); *News*, PRISON UNIV. PROJECT, <http://www.prisonuniversityproject.org/news> (last visited May 22, 2014). For more information about Illinois' Education Justice Project, see EDUC. JUSTICE PROJECT OF THE UNIV. OF ILL. AT URBANA-CHAMPAIGN, <http://www.educationjustice.net/home/> (last visited May 22, 2014) (also providing links to newsletters, stories, and publications).

26. Madeleine Hamlin, *Reaching Families and Communities*, EDUC. JUST. PROJECT NEWSL., Spring 2012, at 1, available at http://www.educationjustice.net/home/wp-content/uploads/2013/08/EJP_Spring_2012_Newsletter.pdf.

Program until recently.²⁷ The AI has been committed to prison education since 1972²⁸ and has donated all costs since the withdrawal of Pell Grants in 1994.²⁹ The program's operation is entirely subject to the university, to its standards, requirements, procedures, and ideological support for prison education.

The DOC, likewise, is committed to the PPEP, and this year hosted a fortieth anniversary gathering to celebrate BU's tenure at the DOC.³⁰ The celebration acknowledged the positive influence that the BU students bring to the prison population, often leaders in other pro-social, self-help groups, and prisoners who do not incur discipline reports that would threaten their GPA. There is a sense of ownership which is positive, but which can tempt the correctional facility to use withdrawal from the BU Program as a punishment. This is understandable given the long-term relationship of the BU Program and the institution's educational department. However, the PPEP administrator must be firm that participation in the educational program is not a control tool at the disposal of the institution, but an outside program donated to the institution.

The support of both the AI and the DOC is an advantage for the administrator. However, just as the support of the DOC can be contingent, so can the commitment of the university. For example, BU spends over a million dollars in supplies, salaries, and tuition scholarships. Yet, until recently, staffing was minimal, while collateral expenses, such as paying the incarcerated clerks a stipend for their work, have been eliminated. For its part, the DOC can be expected to balk at basic tenets of academic freedom, as the PPEP is of such long-standing that it is subject to the same rules as DOC programs; for example, the PG-13 film policy mentioned above.

The relationship of the BU PPEP is secure in this *between* relationship, yet both organizations suppress public knowledge of the program, certain the response of the public would be negative. So, the PPEP must please two masters, while remaining "under the radar." Both entities eschew anything that suggests advocacy, which leaves no one, neither BU nor the DOC, to advocate for educational innovation. Suggestions such as limited computer research access, technology to help incarcerated students write papers or learn languages, or university sponsored re-entry services for released prison students are not supported by either the DOC or the otherwise supportive AI.

27. For more information about the Boston University Prison Education Program, see *About the Prison Education Program*, BOS. UNIV. PRISON EDUC. PROGRAM, http://www.bu.edu/pep/about_us/ (last visited May 22, 2014).

28. *Id.*

29. *Id.*

30. *Stakeholders Visit DOC to Enrich Partnerships*, 9(2) AROUND THE BLOCK (Mass. Dep't of Corr. Newsl.), Mar. 2013, at 3.

VIII. *WITH*

This prepositional relationship implies a partnership of the AI *with* the DOC and the possible importation of values and norms from the DOC to the AI. Unlike the *of* relationship in Indiana, the DOC does not provide financial support, and unlike most programs, funding is not obtained by the PPEP itself, but is granted by the AI. The administrator is part of the AI, assigned the responsibility of administering the program. This is the model recently instituted at Boston University as my tenure as Director came to an end. The advantages and disadvantages of the *with* model are unknown.

The BU academic department, in which the PPEP is located, is chaired by a former DOC employee. The new director is an assistant professor at BU and also a former DOC employee, a forensic psychologist. She had an assistant, also a former DOC employee, a former superintendent. What remains to be seen, in this prepositional relationship, is how the potential for a confluence of values—those of the AI with those of the DOC—could impact the PPEP.

The assumption of the AI is that a former DOC employee will understand the restraints on an educational program conducted in a prison. Furthermore, in this case, the AI agrees with the DOC that public knowledge of the program should be minimal, fearing a public backlash.³¹ The relationship between the DOC and the AI may well run very smoothly, more smoothly than in the *between* model. Former employment at the DOC is certainly not a disqualifier for effectively administering a PPEP; further, it is hoped it will prove structurally useful for the PPEP leadership to be situated if not at the prison, at least at the educational institution which funds the program.

A possible disadvantage of this *with* prepositional relationship could be the loss of contrast between the perspective of the AI and the perspective of the DOC, as experienced by students. Academics see their students in terms of their future; corrections personnel must see their charges based on their past actions. Part of the positive impact of a PPEP, based on students' accounts in course evaluations, is that the classroom is an "oasis" that "takes them out of prison" and "treats them like people." The normalizing effect of the outside professor-inside student interrupts the prisonization brought on by incarceration and contributes to rehabilitation. It remains to be seen if the healthy tension between the AI perspective and the DOC perspective will continue, or whether they will merge, possibly reducing the rehabilitative properties of prison education.

31. See Irene C. Baird, *The Education of Prisoners: A Holistic Perspective*, 18 PAACE J. LIFELONG LEARNING, at xx (2009) (discussing a previous backlash for financially supporting postsecondary education for prisoners); LAURA WINTERFIELD ET AL., URBAN INST., THE EFFECTS OF POSTSECONDARY CORRECTIONAL EDUCATION: FINAL REPORT 2 (2009) (stating that previous backlash was based on "the erroneous assumption that prisoner access to Pell funds limited access for non-prisoners").

IX. CONCLUSION: FINDING THE RIGHT PREPOSITION

There is much more to say regarding the impact of prepositional relationships among academic institutions, correctional settings, and prison education programs. Each of these factors merits further study. The faculty of the prison education program, for example, used to the autonomy and respect attributed their role on campus, sometimes struggle with being underneath correctional officers, behave *in opposition to* them, and find a way to achieve their goals *in spite of* them. Some programs—such as the Alabama Prison Arts and Education Project (APAEP)³²—institute creative policies to reassure the DOC of their suitability to teach in a prison. For example, they urge their faculty to wear a sort of “uniform” of their own, street clothing bearing the name of the PPEP. The APAEP “uniform” does not affect the content of the classroom. However, it complies with the prison dress code and resonates *with* the DOC as a requirement of hierarchy, rather than the freewheeling autonomy of the academy.

The role of public exposure of the PPEP to the community, the power of the media, and celebrity endorsements cannot be underestimated.³³ Photographs and films of our students as they strive and achieve make for powerful testimony *beyond* the power of our words to convey. Prohibitions *against* speaking to the press, writing about prison work outside scholarly journals, and forbidding media images of prison students removes a powerful tool from subject PPEP’s.

Finally, other aspects of PPEP’s affect their operation. For example, programs differ and relationships are affected by whether the goal of the program is a degree, and if so, what level the degree. The AI is increasingly involved with each intensification in the formality of the educational result: a single course versus a bachelor’s degree. In addition, the source of funding matters. A program wholly supported by an academic institution will vary in significant ways from a program that pays tuition to the institution, or one with the support of a foundation that believes in the mission. The AI-financially supported program may be required to offer courses parallel to those offered on campus; for example, the BU PPEP requires Introduction to Computers, which incarcerated students must take, despite their lack of access to a computer. A program, such as Hudson Link, can design a course that is relevant to prisoners, and need only persuade the AI to whom it pays tuition of the course’s academic merit. Outside funding, interested in prison education, is even less prescriptive, preferring to leave that negotiation to the AI and the correctional facility. Lastly, the age and experience levels of the founders can

32. For more information about the Alabama Prison Arts and Education Project, see ALA. PRISON ARTS & EDUC. PROJECT, <http://www.humsci.auburn.edu/apaep/> (last visited May 22, 2014).

33. *See supra* Part V.

make a qualitative difference in the challenges they encounter in administering their programs. Determined and youthful undergraduates have started many fine programs, but only after they fought an uphill battle to be taken seriously by both their educational institution and the prisons they approached.³⁴

There is no perfect prepositional relationship. Those who want to start a PPEP, should—in any way they can. Some prison postsecondary education is always better than no prison postsecondary education. Ultimately, it is what goes on in the classroom that benefits our students. However, “prepositional” relationships among the AI, the DOC, and PPEP will impact the program and the stress level of the program’s leadership in distinct ways. It is good to have the beginnings of a typology, flawed as are all ideal types, to objectify the structural conditions under which we work. It is enormously rewarding work, as we all know. When it gets difficult, perhaps thinking about prepositions and structural arrangement will help us deal with frustration and discouragement, and find a persuasive way around an obstacle.

34. Led by Emily Guenther, Grinnell College’s Liberal Arts in Prison program is one example of a program begun and maintained by the tenacity of undergraduates. See John Hammers, *Grinnell Inside the Fences*, GRINNELL MAG., Summer 2012, at “inside front”; *Liberal Arts in Prison Program Staff: Emily Marie Guenther*, GRINNELL COLL. LIBERAL ARTS IN PRISON PROGRAM, <http://www.grinnell.edu/view-profiles/liberal-arts-in-prison-program/Staff?group=10447> (last visited May 22, 2014). For more information about the Liberal Arts in Prison Program, see GRINNELL COLL. LIBERAL ARTS IN PRISON PROGRAM, <http://www.grinnell.edu/academics/offices/liberal-arts-prison/mission?group=10447> (last visited May 22, 2014).