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“The More Connection the Better”: Bounded Relationships and Uneasy Alignments in Prison Education

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“THE MORE CONNECTION THE BETTER”: BOUNDED RELATIONSHIPS AND UNEASY ALIGNMENTS IN PRISON EDUCATION

CHRYSANTHI LEON,* GRACIELA PEREZ,** JULES LOWMAN,*** LAWSON SCHULTZ,**** ATIEH BABAKHANI,* DYLAN ADDISON** AND BARBARA WHITE***

Abstract

This Article examines Inside-Out pedagogy with qualitative data from an evaluation at a women’s prison as a case study of uneasy alignments between opposing systems. The Article analyzes student data from pre and post course surveys and follow up interviews scheduled within the year after the course was completed. Hearing from people most impacted by how emotionality and rationality are circumscribed within the prison classroom leads to recognizing the conditional connections formed in Inside-Out classes as “bounded relationships.” This concept emphasizes the physical boundaries and interpersonal regulations associated with incarceration and situates their impact on education in prison within the broader context of alienation and constrained autonomy imposed by the criminal legal system. This boundedness shapes experiences in the class and afterwards and may undermine the radical intentions of Inside-Out, with lessons for other attempts at bridging or aligning disparate approaches or systems.

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I. INTRODUCTION: CAN PRISON BE TRAUMA-INFORMED?

The *Journal's* 2023 Symposium brought an interdisciplinary group together to explore and discuss the implications of legal coercion as therapeutic intervention, drawing attention to the consequences of such uneasy alignments. This Article will use a case study¹ of one such program to explore the implications for systems with opposing approaches to human agency and well-being that is analogous to many of the uneasy alliances discussed at the Symposium and explored in this special Issue. The prison classroom serves as an example of a soft place within a hard place that provides “open-heartedness and care” within “the inherently harsh prison system.”² A tradition among critical scholars and activists like Cheliotis³ calls us to consider whether we should continue working on incremental improvements in systems that we know to cause harm, or whether we should remove our energies and work on wholly different responses, including social movements that would secure a broader sense of well-being for all and build solidarity across communities. We take seriously the work of prison abolitionists “trying to attend to the immediate needs of those trapped in this system while working towards the long term aim of dismantling it.”⁴ Specific to prison programming, Cheliotis cautions against the trend in criminological scholarship to focus “disproportionately on the development and effectiveness of formalised practitioner-run prison programmes which claim to ‘empower and rehabilitate’” and may approach research evaluation “uncritically, devoid of the socio-political dimensions of their context, content, conduct and consequences.”⁵

Our contribution developed in this Article, the concept of “bounded relationships,” is informed by feminist research that attends to the wisdom and agency exhibited by people who may otherwise be thought of as “less than.”⁶ For example, Rosen and Venkatesh⁷ describe sex workers in a Chicago housing

1. Given the interdisciplinary nature of this Article, and in preparation for its publication, the *Journal of Health Care Law & Policy* consulted with experts in the field to review the Article and verify that the propositions and methodologies used by the authors are sound.

2. Leonidas K. Cheliotis, *Decorative Justice: Deconstructing the Relationship Between the Arts and Imprisonment*, 3 INT'L J. FOR CRIME, JUST. & SOC. DEMOCRACY 16, 24 (2014).

3. *Id.*

4. Tessa Hicks Peterson, *Healing Pedagogy from the Inside Out: The Paradox of Liberatory Education in Prison*, in CRITICAL PERSPECTIVES ON TEACHING IN PRISON: STUDENTS AND INSTRUCTORS ON PEDAGOGY BEHIND THE WALL 175, 180 (Rebecca Ginsburg ed., 2019).

5. Cheliotis, *supra* note 2, at 23.

6. See generally Corey S. Shdaimah & Chrysanthi Leon, “*First and Foremost They’re Survivors*”: *Selective Manipulation, Resilience, and Assertion Among Prostitute Women*, 10 FEMINIST CRIMINOLOGY 326 (2015); Corey S. Shdaimah & Chrysanthi S. Leon, *Whose Knowledges? Moving Beyond Damage-Centered Research in Studies of Women in Street-Based Sex Work*, 1 CRIMINOLOGICAL ENCOUNTERS 19 (2018) [hereinafter *Whose Knowledges?*].

7. Eva Rosen & Sudhir Alladi Venkatesh, *A “Perversion” of Choice: Sex Work Offers Just Enough in Chicago’s Urban Ghetto*, 37 J. CONTEMP. ETHNOGRAPHY 417 (2008).

project who employ “bounded rationality,” a process by which they make decisions in order to solve a problem quickly and locally, whether or not the decision is “optimal or desirable in the abstract.”⁸ In what appears analogous, students in Inside-Out prison education courses engage in bounded relationships, relying on the trust and empathy they have built through the deliberate pedagogical practices promoted by Inside-Out, to benefit from the academic and personal growth that these courses make possible.⁹ They know the relationships are bounded by the semester and other restrictions, but they each make choices to connect, often through shared vulnerability.¹⁰

While the focus in this Article will center on understanding the tensions between student-centered pedagogy and institutional goals of rehabilitation and punishment, the Article is situated in a broader area of critical scholarship that uses data from people most impacted by such programs to explore “the controversial marriage of rehabilitative and penal practices ... [and the] complex interplay between different forms of coercion and rehabilitation.”¹¹

A. Law in Action: Well-Meaning Professionals Within Oppressive Systems

In the last fifty years, a great deal of writing within the “law and society” subfield focused on examining how people who work within systems that are arms of the state, such as schools, police departments, welfare offices, or legal aid offices, shape what law means both for their constituents and broader social movements.¹² Recent work focuses on how people work with highly stigmatized and vulnerable populations, which includes family members of convicted sex offenders,¹³ street based sex workers,¹⁴ and people incarcerated in a women’s correctional facility serving significant sentences.¹⁵ Most of the people who work within these systems and with these populations serve professional roles that

8. *Id.* at 425; see also Mira Baylson, *Victim or Criminal? Street-Level Prostitutes and the Criminal Justice System*, in CHALLENGING PERSPECTIVES ON STREET-BASED SEX WORK 136, 137 (Katie Hail-Jares et al. eds., 2017).

9. See *infra* Part II.

10. See *infra* Part IV.

11. COREY S. SHDAIMAH, CHRYSANTHI LEON & SHELLY A. WIECHELT, THE COMPASSIONATE COURT? SUPPORT, SURVEILLANCE, AND SURVIVAL IN PROSTITUTION DIVERSION PROGRAMS 39 (2023).

12. Shannon Portillo & Danielle S. Rudes, *Construction of Justice at the Street Level*, 10 ANN. REV. L. & SOC. SCI. 321, 322 (2014); Atieh Babakhani, *Agents of Change or Agents of the Status Quo? Iranian Divorce Lawyers’ Approaches to Discriminatory Divorce Law in Everyday Practices* 116 (2023) (Ph.D. dissertation, University of Delaware) (on file with author).

13. Chrysanthi S. Leon & Ashley R. Kilmer, “*Secondary Registrants*”: A New Conceptualization of the Spread of Community Control, 25 PUNISHMENT & SOC’Y 641 (2023).

14. Chrysanthi S. Leon & Corey S. Shdaimah, *Targeted Sympathy in “Whore Court”*: Criminal Justice Actors’ Perceptions of Prostitution Diversion Programs, 43 L. & POL’Y 126, 127 (2021).

15. Shoshana Pollack, *Transformative Praxis with Incarcerated Women: Collaboration, Leadership, and Voice*, 35 AFFILIA 344, 345 (2020).

limit their choices about how to construct the problems they and the people they are serving face. This professional influence means these workers often focus on individual responses, often “responsibilizing,” meaning that their use of discretion effectively locates problems within individuals rather than in structures or policies, as typifies neoliberal systems including the United States criminal legal system.¹⁶ However, empirical research has shown that these professionals are well aware of the structural forces that dominate the lives of vulnerable populations, including street based sex workers and women convicted of violence in response to violent relationships—many of whom are enrolled as students in the correctional facility under study here: people who have acted in violence in response to interpersonal and patriarchal violence.¹⁷

So, how do these well-meaning people address their work? In one strand of research, findings show these individuals target their sympathy to a relatively narrow category of people who meet their criteria of worthiness, which ends up diverting resources towards this favored group and reinforces ideas about who deserves assistance and support (and who does not).¹⁸ A much larger body of research documents how these uses of professional discretion can soften hard systems, as well as shape how ordinary people believe the law is available to them—what scholars call “legal consciousness.”¹⁹ Such professionals act as agents of transformation; for example, listening to someone’s complaint about a harm they experienced and reframing it either as a violation of rights or as a common experience that must be dealt with and set aside.²⁰ This softening can be valuable, but generally leaves intact the systems of control.

In the setting of a women’s correctional facility, we interacted with correctional officers, teachers, and counselors who exhibited great sensitivity towards the needs of the people incarcerated there, recognizing them as excellent mothers, exemplary artists, poets, and brilliant students, temporarily softening the retributivist and punitive aspects of the penal system. We also observed some of these workers engage in the kinds of humiliating and degrading behaviors towards incarcerated people that reinforce boundaries between good and bad, worthy and unworthy, acceptably feminine and manipulative, and problematic

16. Chrysanthi S. Leon & Corey S. Shdaimah, *JUSTifying Scrutiny: State Power in Prostitution Diversion Programs*, 16 J. POVERTY 250, 251 (2012).

17. Susan L. Miller & Michelle L. Meloy, *Women’s Use of Force: Voices of Women Arrested for Domestic Violence*, 12 VIOLENCE AGAINST WOMEN 89, 89 (2006); Stephanie Hartwell, *More of a Danger to Myself: Community Re-Entry of Dually Diagnosed Females Involved with the Criminal Justice System*, in NEITHER VILLAIN NOR VICTIM: EMPOWERMENT AND AGENCY AMONG SUBSTANCE ABUSERS 157, 157 (Tammy L. Anderson ed., 2008).

18. Leon & Shdaimah, *supra* note 14, at 127–28.

19. Simon Halliday, *After Hegemony: The Varieties of Legal Consciousness Research*, 28 SOC. & LEGAL STUD. 859, 859–60 (2019); Susan S. Silbey, *After Legal Consciousness*, 1 ANN. REV. L. & SOC. SCI 323, 323–28 (2018).

20. Austin Sarat & William L.F. Felstiner, *Law and Strategy in the Divorce Lawyer’s Office*, 20 L. & SOC’Y REV. 93, 126 (1986); Babakhani, *supra* note 12, at 74.

or otherwise unruly women.²¹ Thus, we experienced the power of professionals' care, as well as observed and experienced firsthand and secondhand the harms that working within these oppressive systems create, even for the most caring and careful of professionals.²² This leads to the current quandary that Leon posed at the beginning of her remarks at the 2023 Symposium: Can prison be trauma informed? Put another way, can anything that happens in prison be therapeutic?

1. Prison Classroom "Security"

For the last eight years, excluding a few semesters during the pandemic, Leon spent nearly every fall and spring semester teaching a college course within a women's correctional facility. Specifically, she taught an Inside-Out course,²³ meaning the classroom is composed of half incarcerated students and half traditional college students who come into the correctional facility with the instructors each week. To enter, nonincarcerated students completed paperwork disclosing their own criminal histories or contact with incarcerated people and attended a security briefing.

Last year's briefing took place within the visiting room of the correctional facility, a space Leon had not been in before. Leon and the students sat in small chairs, kind of like those in an elementary school, with bright paintings of butterflies and flowers on the walls, and children's toys and books jumbled on the shelving. The correctional officer leading the briefing read from the same PowerPoint used year after year. The bulk of the briefing used defensive bureaucratic language (colloquially known as CYA-type material) covering the facility policies,²⁴ so that if any problems occurred, the institution could say they

21. See generally Rose Corrigan & Corey S. Shdaimah, *People with Secrets: Contesting, Constructing, and Resisting Women's Claims About Sexualized Victimization*, 65 CATH. U. L. REV. 429 (2016); Anne E. Bowler et al., "What Shall We Do with the Young Prostitute? Reform Her or Neglect Her?": *Domestication as Reform at the New York State Reformatory for Women at Bedford, 1901-1913*, 47 J. SOC. HIST. 458 (2013).

22. TaLisa J. Carter & Chrysanthi Leon, *#ThemToo: Examining Sexual Harassment Among Female Correctional Officers*, in WOMEN, MINORITIES AND CRIMINAL JUSTICE: A MULTICULTURAL INTERSECTIONALITY APPROACH 216-18 (Carla Miller Coates & Moneque Walker-Pickett eds., 2020); see also Sami Abdel-Salam & Ashley Kilmer, 'A Prison Is a Prison': *Perspectives From Incarcerated Men on the Therapeutic and Punitive Aspects of Halden Prison in Norway*, 63 BRIT. J. CRIMINOLOGY 929 (2023) (describing many of same "pains of imprisonment" in therapeutic prisons that are found in retribution-focused prisons)

23. See *infra* Part II.

24. Although a colloquial term, CYA ("covering your ass") is a well-known practice for organizations broadly, and for criminal legal systems like the police, in particular. See Chrysanthi S. Leon, *Law, Mansplaining', and Myth Accommodation in Campus Sexual Assault Reform*, 64 KAN. L. REV. 987, 1000-17 (2015) for CYA in the context of university practices in response to gender-based violence, situated within the sociolegal scholarship on legal endogeneity, and Laura Huey et al., "It's All About Covering Your ...": *The Unintended Consequences of Police Accountability Measures*, 2022 CRIMINOLOGY & CRIM. JUST. 4, 5 (2022) for a conceptualization of CYA as "actions taken to proactively justify officer decisions and to reduce real or perceived risks associated with increased surveillance of their work."

informed guests.²⁵ This included a ceremonial signing of the Prison Rape Elimination Act statement of responsibility.²⁶

The content presented a striking paradox: on the one hand, the facility is introduced as a gender-responsive, trauma-informed facility in its mission statement. Leon and the students sat in a room that underscored the reality that many incarcerated women and femme people are caregivers, often of young children and of others who may be able to visit them²⁷ (although most people are not able to visit their incarcerated loved ones as often as they would like, if at all).²⁸

On the other hand, many slides of this security briefing were devoted to preparing visitors to guard against manipulation, which security presented as an essential characteristic of incarcerated women.²⁹ Over and over, the female correctional officer said to avoid allowing situations to occur in which the manipulative women could take advantage of visitors (e.g., “women are catty,” “women are devious,” etc.). As a women’s facility, the danger was not constructed as a physical threat or as the risk of a riot or other prison uprising, but rather of a more subtle vulnerability to coercion that incarcerated women had mastered.

Ironically, we wrote elsewhere about what is seen as the selective manipulation of criminalized women, the street savvy and often quite sophisticated ability to persevere in situations that many of us could not expect to handle with nearly the aplomb that they do.³⁰ But, within the correctional context, after a conviction and sentence for behavior related to what may have been for survival, this skill set is now constructed as problematic and indicative of an essential deviance.

For outside students and the other visitors trying to take in this messaging, is it possible to reconcile the desire to be trauma-informed and gender-responsive with the command to stay on guard and choose not to believe women or their stories of what is important to them and what they need?

This in turn leads to the question of whether or not to prioritize university partnerships that provide programming within the correctional system. The

25. See Leon, *supra* note 24, at 991.

26. Hayden P. Smith & Creag A. Dunton, *The Prison Rape Elimination Act (PREA): Snitching, Sexuality, and Normalizing Deviance*, INT’L J. OFFENDER THERAPY & COMPAR. CRIMINOLOGY 1, 1–2 (2022).

27. SARAH BERESFORD, PRISON REFORM TR., “WHAT ABOUT ME?” THE IMPACT ON CHILDREN WHEN MOTHERS ARE INVOLVED IN THE CRIMINAL JUSTICE SYSTEM (2018); Susan F. Sharp & Susan T. Marcus-Mendoza, *It’s a Family Affair: Incarcerated Women and Their Families*, 12 WOMEN & CRIM. JUST. 21 (2001).

28. See generally Joshua C. Cochran et al., *Spatial Distance, Community Disadvantage, and Racial and Ethnic Variation in Prison Inmate Access to Social Ties*, 53 J. RES. CRIME & DELINQ. 220, 224 (2016).

29. See Peterson, *supra* note 4, at 181.

30. See Shdaimah & Leon, *supra* note 6, at 326.

courses this Article evaluates and which each author enjoyed offer college credits to the incarcerated students, a space to explore ideas and interact with people who do not live on the same cell block, and the opportunity to develop skills that may aid in writing parole statements or in future life settings.³¹ These courses provide value,³² but prison educational efforts no matter how useful are also arguably mere tinkering, or what critics rightly identify as “prison industrial complex reformism,”³³ which fails to examine deeper structures of state violence and structural anti Black racism.³⁴

It is also important to recognize that the university or education side of the prison/university, or Inside-Out partnership, includes its own set of coercive practices. The “*Ten Tips to De-Carcerate Your Theology, Ethics, or Religion Classroom*” note:

One need not be a convinced Foucauldian to observe similarities between schools and prisons or to inquire into how our collective

31. See, e.g., Jody Lewen, *Prison Higher Education and Social Transformation*, 33 ST. LOUIS U. PUB. L. REV. 353 (2014).

32. Jerrad Allen & Osvaldo Armas, *Learning Inside-Out: The Perspectives of Two Individuals Who Had the Opportunity to Partake in the Soul Journey of Healing Arts and Social Change*, in CRITICAL PERSPECTIVES ON TEACHING IN PRISON: STUDENTS AND INSTRUCTORS ON PEDAGOGY BEHIND THE WALL 166 (Rebecca Ginsburg ed., 2019); Peterson, *supra* note 4, at 180.

33. Dylan A. Addison, “We Do This Just for Love:” Anti-Black Racism, White Supremacy, and Abolitionist Resistance in the Prison Visitation Process 18 (2023) (Ph.D. dissertation, University of Delaware) (ProQuest).

34. Writing about previous scholarship on prison visitation, Addison discusses “the scholarly hesitancy to more deeply critique” in ways that are also applicable to prison education. *Id.* at 19. As Addison explains,

scholars examining the carceral state more broadly, and specifically scholars examining prison visitation, must critically examine their fixation on the false promise of carceral reform Maintaining a reformist stance on visitation means that much of the scholarly suggestions and policy implications put forth ... only touch the surface of the problems of visitation, and are unlikely to yield substantial changes to the visitation experience. This is not to say that these are not important reforms or that they should not be addressed; they would make a tangible difference for the thousands of visitors who find themselves in logistical limbo and emotional turmoil due [to] the unpredictability so ingrained in the visitation experience. But it is to say that these reforms, even if they were uniformly adopted across all detention facilities, would not solve the deeper problems that predominantly Black and brown visitors face as they navigate systems built to uphold and currently entrenched in long legacies of white supremacy, anti-Blackness, and state violence. Secondly, failure to more seriously critique the visitation experience results in a sort of understanding of prison visitation as a somehow benevolent, albeit deeply flawed, offering of the carceral state. In other words, without deeper critique of how visitation, like all other aspects of the prison state, create, maintain, and perpetuate systems of white supremacist domination over poor and vulnerable people of color, visitation can easily be seen as a form of state benevolence Without a more serious consideration of the ways in which white supremacy and anti-Black racism shape the experience of visitation for the predominantly Black and brown women who visit, visitation scholars risk doing the work of the state—or effectively “recus[ing] the state from crises of legitimacy” ... —by further bolstering the carceral state’s presumed legitimacy both within academia and in society more broadly.

Id. at 19–21; see also Peterson, *supra* note 4, at 180.

training structures convey the same ideas and practices we see embodied throughout carceral society. Classrooms can be dynamic spaces for conversations about harm, yet carceral logics permeate our practices and understandings of education. Many teachers report their students displaying fear of punishment and fear of making mistakes in the process of learning. De-carcerating the classroom may naturally include explicit critical analysis of themes of punishment and criminalization, but these issues should also be addressed in course practices and policies. Displays of professorial or institutional authority and assertions of physical and technological control which degrade and isolate are too often taken for granted or justified in pursuing the noble ends of emancipatory education. The distributions of power and prestige afforded by academic institutions can be enticing, but the effects that business as usual have on communities in and out of the classroom must be challenged, so that de-carceration is not just a course theme but an ongoing collaborative practice.³⁵

When a correctional facility is provided a rehabilitative program at no cost, that facility can then use the program to tout its rehabilitation and gender responsiveness. Does this kind of effort perpetuate an essentially violent system or confirm ideas of deservingness and “undeservingness”?³⁶ Is it a reformist reform or a non-reformist reform? The more time spent in the prison, the more the authors have appreciated all of the people there, including the incarcerated people and those who work in the prison; but, we also feel increasingly uncomfortable with the legitimation that our presence may serve.³⁷ Yet students, both incarcerated and not incarcerated, choose social justice-oriented career paths as a result of these types of courses, making their lives and others incrementally better as a result.³⁸

II. RELATIONAL IMPACTS, PRISON EDUCATION, AND INSIDE-OUT PEDAGOGY

Inside-Out pedagogy emphasizes relationships and evaluation studies accordingly depict the significant and rewarding relationships created by the programs.³⁹ Research on prison education frequently foregrounds post

35. Sarah Jobe et al., *Ten Tips to De-Carcerate Your Theology, Ethics, or Religion Classroom*, 23 POL. THEOLOGY 397, 404 (2022).

36. Cheliotis, *supra* note 2, at 24; Peterson, *supra* note 4, at 181.

37. Peterson, *supra* note 4, at 181; *see also* Cheliotis, *supra* note 2, at 24.

38. *See* Alana Van Gundy et al., *Pushing the Envelope for Evolution and Social Change: Critical Challenges for Teaching Inside-Out*, 93 PRISON J. 189, 203 (2013); Graciela Perez & Chrysanthi S. Leon, *Bonds Beyond Bars: Impact of an Inside-Out Prison Exchange Program*, 71 J. CORR. EDUC. 33, 45, 48 (2020).

39. *See generally* Sarah L. Allred et al., *Participatory Evaluation in a Prison Education Program: Meaning & Community Building Within Inside-Out Think Tanks*, 5 CORR. 6 (2020); David Evans, *The Elevating Connection of Higher Education in Prison: An Incarcerated Student’s Perspective*, 9 CRITICAL

incarceration outcomes of courses rather than the emotional and social impact on students still incarcerated.⁴⁰ Relative to the research focused on quantitative or achievement-oriented outcomes, fewer studies explore how higher education in correctional settings “structures the lived experiences” of students.⁴¹ However, a small but robust body of research emphasizes the powerful humanizing effects of students connecting and rejecting stereotypes.⁴² Writing from his own position as an incarcerated person, Evans argues for “elevating” as the goal of education, in contrast with the more utilitarian, penological approach that criminology typically offers⁴³ and its narrow focus on recidivism:

Today, people in the [United States] tend to believe that incarcerated people are the lowest class of people; incarcerated citizens often internalize this and believe themselves to be the “lowest of the low.” Conversely, higher education in prison creates an “elevating connection,” by which I mean it re-establishes our connection to the world and raises our view of ourselves to scholars and human beings engaging in the intellectual community.”⁴⁴

In a study of educational programming in a detention facility for girls in California, researchers emphasized “the girls’ reflections on the power of positive relationship-building between themselves and their teachers.”⁴⁵ More input from incarcerated people is needed in research on prison education and on the emotional and relational implications of Inside-Out pedagogy for this demographic of students.

Such efforts require understanding the isolation of incarceration and its impacts on individuals physically and psychologically.⁴⁶ Early prison sociology documented the “pains of imprisonment” and the way that incarceration robs

EDUC. 1 (2018); Laura Mishne et al., *Breaking Down Barriers: Student Experiences of the Inside-Out Prison Exchange Program*, 1 UNDERGRADUATE J. SERV. LEARNING & CMTY.-BASED RSCH. 1 (2012).

40. Anna Plemons, *Beyond Progress: Indigenous Scholars, Relational Methodologies, and Decolonial Options for the Prison Classroom*, in CRITICAL PERSPECTIVES ON TEACHING IN PRISON: STUDENTS AND INSTRUCTORS ON PEDAGOGY BEHIND THE WALL 80, 82 (Routledge 2019).

41. Sarah L. Allred et al., *Self-Efficacy: An Important Aspect of Prison-Based Learning*, 93 PRISON J. 211, 217 (2013).

42. Evans, *supra* note 39, at 7. We assert that all people deserve dignity and recognition as human and as such the assumption that anyone needs “humanizing” can be paternalistic. But, it is also true that the United States penal system and related cultural tropes reinforce notions of incarcerated people as less than human, and so, incarcerated scholars like Evans deliberately use the term “humanize.” *See id.*; *see also* Angela J. Hattery & Earl Smith, WAY DOWN IN THE HOLE: RACE, INTIMACY, AND THE REPRODUCTION OF RACIAL IDEOLOGIES IN SOLITARY CONFINEMENT (Rutgers University Press, 2022).

43. Evans, *supra* note 39, at 2, 11; David Garland, *Sociological Perspectives on Punishment*, 14 CRIME & JUST. 115, 115–16 (1991).

44. Evans, *supra* note 39, at, at 2.

45. Jerry Flores et al., High Points of Learning Behind Bars: Characteristics of Positive Correctional Education Experiences for Incarcerated Girls, 77 INT’L J. EDUC. DEV. 1, 5 (2020).

46. Naomi F. Sugie & Kristin Turney, *Beyond Incarceration: Criminal Justice Contact and Mental Health*, 82 AM. SOCIO. REV. 719, 722–23 (2017).

people of the myriad of ways to perform identity through relationships.⁴⁷ While framed, in part, as the “deprivation of heterosexual relations,” the outdated aspects of this analysis should not obscure the emphasis on the profound need to see ourselves in the mirror of others and their responses to us.⁴⁸ Separation from an individual’s social network and the larger society—one of the main characteristics of incarceration—is one of the most challenging aspects of prison life to overcome, with one study finding that people “replaced more than 60% of their [social] network members after [experiencing] incarceration.”⁴⁹ Familial separation is a well-known cost of incarceration. Research on incarcerated women and their families shows that women “experience trauma from the disruption of their pre-prison lives.”⁵⁰

The severing of relationships and family ties is exacerbated by the fact that many incarcerated women are mothers. In 2016, the United States Department of Justice found that 58% of incarcerated women had minor children; in 2011, a Delaware survey found that nearly 70% of incarcerated women were mothers.⁵¹ Incarcerated mothers harbor significant stress about their children’s well-being, as they are often sole caregivers before incarceration.⁵² The trauma of separation and disruption is connected to higher recidivism and creates a volatile effect for the children.⁵³ Given an incarcerated individual’s isolation from family and community, the introduction of new relationships is significant. Radical pedagogy offers rare egalitarian connections within a carceral institution.⁵⁴ Emerging research also indicates that prison programming is providing an important space for people with fewer barriers to participation along gender, racial, and ethnic lines than anticipated.⁵⁵ A 2016 analysis of national data found that “members of minoritized groups were [indeed] involved in correctional education programs at the time of the survey. In fact, nonmale and noncitizens were the most likely to report current involvement.”⁵⁶

47. GRESHAM M. SYKES, *THE SOCIETY OF CAPTIVES: A STUDY OF A MAXIMUM SECURITY PRISON* 44 (Princeton Univ. Press 1958).

48. *Id.* at 70–72; see also Megan Comfort, *Punishment Beyond the Legal Offender*, 3 ANN. REV. L. & SOC. SCI. 271, 281 (2007).

49. Beate Volker et al., *Changes in the Social Networks of Prisoners: A Comparison of Their Networks Before and After Imprisonment*, 47 SOC. NETWORKS 47, 47 (2016).

50. Sharp & Marcus-Mendoza, *supra* note 27, at 24.

51. T. REED, STATE OF DEL. OFF. OF THE PUB. DEF., *EXPLORING THE GENDER-SPECIFIC REENTRY NEEDS OF FEMALES DETAINED AT BAYLOR WOMEN’S CORRECTIONAL INSTITUTION IN NEW CASTLE, DELAWARE* 5 (2011); LAURA MARUSCHAK ET AL., U.S. DEP’T OF JUST., *PARENTS IN PRISON AND THEIR MINOR CHILDREN* 1 (2021).

52. BERESFORD, *supra* note 27, at 37; Sharp & Marcus-Mendoza, *supra* note 27, at 22, 26.

53. Sharp & Marcus-Mendoza, *supra* note 27, at 24–25.

54. Deborah Appleman, *Pedagogy*, in *SCHOOL, NOT JAIL: HOW EDUCATORS CAN DISRUPT SCHOOL PUSHOUT AND MASS INCARCERATION* 104, 105 (Peter Williamson & Deborah Appleman eds., 2021).

55. See generally MacKenzie C. Niness, *The Question of Who: Education Program Participation Among Incarcerated Adults* 29 (Nov. 16, 2023) (unpublished conference paper) (on file with author).

56. *Id.* at 30.

Nestled within a broader movement to provide educational access to incarcerated people,⁵⁷ Inside-Out is one of these models of radical prison pedagogy. Created by Lori Pompa in 1995 and drawing on a concept proposed by Paul Perry,⁵⁸ Inside-Out brings traditional college students (“Outside”) into prison environments to learn alongside incarcerated individuals (“Inside”). Inside-Out has grown from a single course in the Pennsylvania prison system to more than 500 courses in 25 states, reaching 15,000 students.⁵⁹ Inside-Out was designed as a revolutionary learning process “that stood in contrast to the daily experience of life inside the prison.”⁶⁰ Specific activities like icebreakers, conversation circles, and discussions foster egalitarian classrooms. The unique pedagogy of Inside-Out cultivates a richer understanding of mass incarceration: “This immersion engenders deeper interaction and more intense involvement, often manifesting as a statement of solidarity with those who are struggling. It is the ultimate border-crossing experience. When students take class together as equals, borders disintegrate and barriers recede.”⁶¹

The intensive teacher training emphasizes the risk of imbalance in how Outside and Inside students might benefit from the course, providing opportunities for experienced teachers to challenge past practices and recognize how inequality is perpetuated in the classroom. Inside-Out is not designed to “help” incarcerated students,⁶² but rather to create an egalitarian learning community that benefits all. The courses emphasize “mutuality,” giving Inside and Outside students equal status within the classroom. Pompa points out that this pedagogy “encourages the intimate connections and personal relationships that result from service built on mutuality.”⁶³ Inside-Out pedagogy provides ample space for reflection, connection, and building relationships.

This context emphasizes the relational needs of students as they come together from a variety of different backgrounds and social identities. Inside-Out effectively facilitates the educational process by creating an egalitarian classroom where students are encouraged to share and connect.⁶⁴ Unfortunately, these connections must expire when the course ends. In adherence to the rules of

57. Appleman, *supra* note 54, at 49.

58. Paul remained involved in developing Inside-Out praxis as a member of the Graterford Think Tank. See *About Us*, INSIDE-OUT CTR., <https://www.insideoutcenter.org/about-inside-out.html> (last visited Nov. 2, 2023).

59. Lori Pompa, *Drawing Forth, Finding Voice, Making Change: Inside-Out Learning as Transformative Pedagogy*, in TURNING TEACHING INSIDE-OUT: A PEDAGOGY OF TRANSFORMATION FOR COMMUNITY-BASED EDUCATION 13, 22 (Simone Weil Davis & Barbara Sherr Roswell eds., 2013).

60. *Id.* at 14.

61. *Id.* at 16, 17.

62. *Id.*

63. *Id.*

64. Ella Turenne, *Breaking Through the “Isms,”* in TURNING TEACHING INSIDE-OUT: A PEDAGOGY OF TRANSFORMATION FOR COMMUNITY-BASED EDUCATION 121, 122–125 (Simone Weil Davis & Barbara Sherr Roswell eds., 2013).

the prison and Inside-Out pedagogy, Inside and Outside students are prohibited from communicating outside of the classroom environment.⁶⁵ These rules shape what Pompa⁶⁶ explains as Inside-Out’s “intentional” approach to relationships: students use only first names, share no identifying information, and must adhere to the security rules of the host institution.⁶⁷ Students are also cautioned to view their role as learners alongside their peers, rather than to view their participation as “research” and instructors are strictly prohibited from conflating their teaching in Inside-Out with research projects.⁶⁸ Until 2018, the Inside-Out Center and Training Program told instructors to exclude students with a previous sex offense conviction—a policy explained as painful but necessary, and which received pushback from training participants.⁶⁹ Limitations on student interactions protect the university and the prison, promote the longevity of the program, and help to assuage concerns about safety. Relationships remain within the classroom where they were built, though alumni activities and ongoing participation in think tanks may be available to some students.⁷⁰

We appreciate Inside-Out’s work to break down barriers between incarcerated and free people, which in addition to spreading exponentially, is well-documented in a series of evaluations, reflections, and other works, including our own.⁷¹ We acknowledge that the security of the program requires that romantic relationships and other intimacies are discouraged, and we have experienced firsthand what a positive and liberating space Inside-Out classrooms can be.

However, our own experience in prison classrooms,⁷² combined with the results of our evaluation research, together lead us to call for a reexamination of the terminal nature of Inside-Out relationships. While ending these relationships may seem harmless, they compound the severing of familial and romantic relationships that women experience in prison. Inside-Out’s encouragement to form relationships and tendency of the coursework to be personal and emotional in nature creates a significantly different classroom experience than traditional models that emphasize shared intimacy. It is our responsibility to consider the

65. Pompa, *supra* note 59, at 16.

66. *Id.*

67. *Id.*

68. *Id.*

69. Leon’s 2015 training included this admonition and extended discussion from some of the trainees who objected. A November 2, 2018, email on file with the authors states: “There is no longer a program-wide rule that prohibits those with sexual offenses on their records from participating in these classes. However, we would recommend that individuals be considered on a case-by-case basis.”

70. Pompa, *supra* note 59, at 23.

71. See Allen & Armas, *supra* note 32, at 166–75; see also Chrysanthi S. Leon & Graciela Perez, Reading “Women Don’t Riot” After the Riot: Creating a University-Prison Collaboration, 5 J. PRISON EDUC. & REENTRY 144, 144–56 (2019); see also Perez & Leon, *supra* note 38, at 45–49.

72. See *supra* Section I.A.

ramifications of encouraging meaningful connections, knowing these connections can prove problematic when they are required to end. Our intersectional, feminist ethics demand that we think through the implications as we consider our own pedagogies and responsibilities.

III. DATA, METHODOLOGY AND RESEARCHER POSITIONALITY

A. Research Design

Our analysis combines field notes and reflections on our role as teachers with interview and focus group data from a multiyear evaluation project approved by the Institutional Review Boards (“IRB”) from the University of Delaware and the state’s Department of Corrections. The university IRB included a prisoner advocate who helped shape the design. We also shared the project with the Inside-Out Prison Exchange Program to ensure it maintained boundaries between student participation in class and in the research. The university IRB included a prisoner advocate who was particularly helpful in shaping the research design.

Study participants include Outside and Inside students who took at least one Inside-Out course at a Mid-Atlantic women’s correctional institution (“MWCI”), offered through the University of Delaware, a large research university. The course offerings varied, although all followed the Inside-Out pedagogical structure and qualified as upper-division seminar courses, which used literature and social science to explore themes including gender, sexual identity and social change, and emphasized oral communication, critical reading, and writing skills.⁷³ During the study period, which occurred between 2016 and 2020, MWCI typically held about 400 people on a daily basis, including both detainees awaiting trial and those already sentenced. Although some incarcerated people could complete coursework in other programs by correspondence, Inside-Out provided the only in person, college level coursework available; college credit was provided for all students in the first cohort, and thereafter for one to five of the incarcerated students per cohort, dependent on grant funding.⁷⁴

73. See Leon & Perez, *supra* note 71 (providing an in depth discussion of one educational course from Inside-Out Prison Exchange Program and describing its content and approach).

74. Several of the Article’s authors participate in the University of Delaware Anti-Racism Initiative and its First State First Chance Prison Education Program. Their participation and contributions have made it possible for the program to offer additional courses, ensure course credit for all incarcerated students, and put emphasis on courses needed to obtain an associate degree in the arts from the University of Delaware or elsewhere. See *First State First Chance UD Prison Education Program*, UNIV. OF DEL., <https://sites.udel.edu/antiracism-initiative/committees/first-state-first-chance-ud-prison-education-program/> (last visited Nov. 2, 2023); see also *First State, First Chance: University of Delaware Prison Education Research Review*, UNIV. OF DEL., <https://cpb-us-w2.wpmucdn.com/sites.udel.edu/dist/f/8155/files/2021/08/Research-Review-University-of-Delaware->

B. Interview Process

This study draws on twenty-eight post course follow-up interviews.⁷⁵ We asked five open ended questions involving recall of the most salient aspects of the course, including interactions with classmates. The first iteration of the class, held during fall 2016, served as a pilot and provided preliminary findings that shaped the follow-up interviews. Collaborating with students in the development of the assessment, remaining transparent in the process of this research, and allowing students to lead the follow up conversations aided our efforts “to perform high quality research that captures the voices of persons incarcerated.”⁷⁶ Interviews typically took approximately twenty minutes. However, due to restrictions at MWCI, follow-ups for Inside students were conducted as focus groups ($n = 14$), while Outside students ($n = 14$) participated in individual interviews.

As instructors, we emphasized that students should not feel obligated to participate, but the majority completed the post test; of these respondents, nearly all provided follow-up consent. However, only a fraction of the original sample of 87 participants completed a follow-up (14/44 Outside and 14/43 Inside), doing so at equivalent rates.⁷⁷ In light of the low response rate, we made particular efforts to ensure Inside students could provide feedback, which is a strength of the study.

The majority of respondents (82%) identified as women and the remaining self-identified as male or gender fluid. All respondents had at least a high school diploma or its equivalent and 32% of Inside students had some college training or more. To maintain confidentiality, we gathered no other demographic information and participants selected their own pseudonyms. However, based on

Prison-Education-Project.pdf (last visited Nov. 2, 2023) (describing Inside-Out Program at University of Delaware and other prison education programs from various universities).

75. Although both Inside and Outside students volunteered for the course, the choice of Inside students was constrained by the paucity of options for obtaining “good time.” Inside students were required to have at least a high school diploma or GED and were screened by the institution’s educational supervisor. After that screening, Inside students met with Leon to discuss the course, ensure interest, and address any questions or concerns. Outside students had similar academic prerequisites for the course. They also completed a background check and attended a one-on-one interview with Leon and a mandatory security briefing held at the prison site. See Leon & Perez, *supra* note 71, at 41–49 for evaluation of pre- and post- test surveys.

76. *Id.*; see also Yasser Arafat Payne & Angela Bryant, *Street Participatory Action Research in Prison: A Methodology to Challenge Privilege and Power in Correctional Facilities*, 98 PRISON J. 449, 450 (2018).

77. This follow-up rate is in keeping with predictably high attrition among incarcerated participants and with the difficulty of reaching students who had graduated. See Marietta Martinovic et al., *Changing Views and Perceptions: The Impact of the Australian Inside-Out Prison Exchange Program on Students*, 24 EDUC. RSCH. & EVALUATION 437, 443 (2018).

field notes and observations, we estimate that participants ranged in age from eighteen to seventy, with most presenting as White.⁷⁸

C. Analytical Approach

All Outside instructors and one Inside co-instructor⁷⁹ of the courses during the study period, as well as two independent coders, participated in the analysis. Throughout, we derived codes from sensitizing concepts that emerged from the data.⁸⁰ Leon met with the independent coders to compare and revise our separate codes through discussion and consensus. Once we developed our focus on relationships, we independently applied the consensus coding scheme. To ensure study rigor, we engaged in member checking,⁸¹ peer debriefing, memoing, and triangulation of data sources.⁸² We also employed negative case analysis, searching for examples to contradict or illuminate our initial interpretation.⁸³ The variety of perspectives represented by our coding team is another strength of the study. The limitations on involving Inside collaborators is a limitation, because the institution would not allow us to either list currently incarcerated Inside co-instructors as co-authors or meet to discuss our findings, thus, limiting our authorship to include just one of our formerly incarcerated co-instructors.⁸⁴

1. Author Positionality

This analysis benefitted from the diverse set of perspectives and experiences of each author. Our social identities include: ages ranging from twenty to sixty; queer and straight; and cis and nonbinary gender identities. Our roles include undergraduate student, doctoral student, and professor. Many of us

78. The disproportionate participation of White women in the courses is likely a product of multiple factors, including larger patterns of racial discrimination and barriers to education and programming, as well as micro level factors such as the lead instructor's identity as a White woman. This is an understudied area. See generally Ruth Chiqwada, *The Criminalisation and Imprisonment of Black Women*, 36 PROB. J. 100, 100–05 (1989) (discussing disadvantages Black women experience while incarcerated).

79. A note on terminology and power in the classroom: Leon served as the professor/instructor of record for each course. Each semester, at least one Outside graduate or undergraduate student was appointed as a "teaching assistant," and an Inside student who had either completed a previous course or worked in the prison's education unit was appointed to assist the course. For all courses, regardless of status or title, each functioned as "co-instructors," by meeting with students, offering feedback on work, and leading activities and discussions during class time.

80. See BARNEY G. GLASER & ANSELM L. STRAUSS, *THE DISCOVERY OF GROUNDED THEORY: STRATEGIES FOR QUALITATIVE RESEARCH* 38–39 (1967) (discussing importance of generating a sensitizing concept when conducting qualitative studies).

81. See *infra* Part IV.

82. NORMAN K. DENZIN & YVONNA S. LINCOLN, *COLLECTING AND INTERPRETING QUALITATIVE MATERIALS* 7 (3d ed. 2008).

83. See generally Rebecca Jean Emigh, *The Power of Negative Thinking: The Use of Negative Case Methodology in the Development of Sociological Theory*, 26 THEORY & SOC'Y 649 (1997).

84. The authors did attempt a member checking by correspondence, as detailed in the conclusion. See *infra* Section III.C.

identify as White, with one who chooses “Other” within the United States’ choices of racial and ethnic categories and another as Latinx. Our ability to develop a thoughtful critique of Inside-Out pedagogy as practiced in these courses arose from the nuance of our individual experiences. These experiences include serving as co-instructors,⁸⁵ members of our University of Delaware prison education initiative,⁸⁶ and in various roles with Inside-Out and non Inside-Out prison education modalities (with both in person and Zoom instruction). Some of us also identify as impacted by the criminal legal system.

IV. ANALYSIS

A. Identities, Experiences, & Positionalities That Shape Classroom Relationships

Positionalities also shaped what students brought to the course, as illustrated by the data with how the unique students in these courses forged relationships, with particular attention to gender, age and parental status. A majority of students were White presenting, including Inside students, at a rate disproportionate to the overall institutional composition, which is mostly non White. Although the topics of class sessions, readings, and student writings often centered on racial and ethnic identity,⁸⁷ the study did not ask directly about specific aspects of identity. Notably, students did not introduce race and ethnicity in response to open ended questions, with a few exceptions, including an Outside student who commented on the predominantly White student population at our university:

A lot of the interaction that we have peer-to-peer [on campus] is with people that a lot of times are the exact same as you, in terms of just the same age, [and] generally for this campus, the same race, similar backgrounds. I think the opportunity to go be with people with different stories, someone coming from a different place (I mean generally they were all older than us), ... I felt that was very interesting. (Lady Disco)

Since we intentionally did not collect data on race or ethnicity, we do not know if the quoted student identifies as White. But in the field notes, we reported that Outside students of color reflected on the “relief” of participating in a

85. See *supra* note 69.

86. See *supra* note 17.

87. See Leon & Perez, *supra* note 71, at 145. To create a culturally diverse and inclusive environment, we were mindful of designing syllabi that provided a diverse range of topics, authors, and perspectives. See Hossna Sadat Ahadi & Luis A. Guerrero, *Decolonizing Your Syllabus, an Anti-Racist Guide for Your College*, ACAD. SENATE FOR CAL. CMTY. COLLS. (Nov. 2020), <https://www.asccc.org/content/decolonizing-your-syllabus-anti-racist-guide-your-college>.

somewhat more diverse space and on the relative transparency of immigration status in the prison classroom as compared to the university campus.

Students did discuss gender, age, and parental status without prompting. Some students believed that being in a women's prison with predominantly woman-identifying students contributed to an environment where all students would speak up, such as Rita: "I felt like everyone in that class wanted to talk. It was very open. I don't know if that would have changed if it was at another place, or with guys instead of the females, or if it was just that group of people, but I really enjoyed it." Many Outside students like Rita noted that relationships with the Inside students were central to their learning. Nearly every student expressed appreciation for the unique quality of the class environment and how it enabled discussion, using terms like, "refreshing," "nurturing," "listening," "eye-opening," "free," "enthusiastic," "immersive," "vulnerable," "humbling," "comfortable," "cohesive," and "open." As Bunny shared, "[i]t was more like you could immerse yourself in the readings and you could take that into the classroom and talk about it and have everyone's experience from it [B]eing able to experience that is something, like, completely different."

Inside students (both women) also noted gender as they reflected on how they interacted with Outside students during the course. Divine noted that "[t]here was a male student who just really had a great personality and made me feel very comfortable." Pigz stated that "[t]he Outside students were reserved at first but they opened up. By the end we had a bond that felt like we've been friends for a long time. There were no feelings of judgment. I was glad there were men." The presence of men is an unsurprising focus of commentary as the class took place in a women's facility, but we interpret the salience of gender in responses as indicating that gendered expectations shaped what students brought to the course. Further, the presence of openly trans male Inside students significantly impacted discussions within the classroom; the perspective of these students shaped the way both Inside and Outside cisgender students approached discussions of gender explicitly and how they interacted with each other.⁸⁸ Students were not essentialist or reductionist in their views—that is, they did not make generalizations around gender, but rather noted that it seemed meaningful in an undetermined way. For one student, gender seemed related, but not wholly responsible, for creating a dynamic that "worked."

I don't know how to describe it. [In the courses in male facilities] it seemed like there was more of a separation between the Inside

88. During the security briefings attended by Outside students, correctional officers emphasized the importance of using correct pronouns and referenced ongoing litigation. Transgender Inside students were able to participate in higher education opportunities at the institution despite the discrimination, retaliation, and repression they face under typical circumstances. Sarah A. Rogers, *Policy Recommendations for Incarcerated Trans Men in the United States*, in *ADVANCES IN TRANS STUDIES: MOVING TOWARD GENDER EXPANSION AND TRANS HOPE* 109, 111–19 (Austin H. Johnson, Baker A. Rogers, & Tiffany Taylor ed., 2021).

students and the Outside students in a way. [In contrast], it just seemed like our class worked I don't know if it was a women's prison that made it a little easier. (Lavender)

Noting a different impact of gender, Reid Wiley recalled analyzing a reading that described the systematic degradation of Black women with a class of women who had *lived* that misuse of the law:

I struggle with women in general I don't like women inherently which is something I'm working on and I think sometimes I'll put unreasonable expectations on women and mothers, and reading that I was like, “ . . . I do that!” And I know a lot of people do. I think it was more subconscious because we were surrounded by women. I think I had to learn how to interact with them better in class, and then try to take that away. (Reid Wiley)

Reid felt the Inside-Out format gave her space to identify her biases and work on herself.

In addition to the prevalence of conversation about gender in our research, students reflected on motherhood and generational identities, including their own intersectional identities, likely because some of the readings explored intergenerational and family relationships. A number of Inside students who participated in the course mentioned their children, while none of the Outside students did, although a few shared the significant sibling caregiving duties that limited their time to study. This maternal identity impacted student perceptions of the course material and the other class participants. Age differences were at times an obvious divider within the classroom, as the twenty-something Outside students interacted with Inside students who ranged from a few of the same age to their sixties, with the majority of Inside students in their thirties and forties. Questions about the impact of the age disparity arose before the course began, as Gray, an Inside student commented that “we didn't know what to expect either, [because] some students are younger than my own children.” Gray drew a personal, maternal connection to the Outside students in part through sharing personal experiences and opinions, as encouraged by Inside-Out pedagogy. Inside-Out's emphasis on mutuality allowed camaraderie to form between students relatively quickly. As Pigz told us, “[f]rom the beginning, I felt like they were my little children.” Outside students expressed an understanding of this maternal implication as well, describing their Inside counterparts as “nurturing” and “wise.”

Our study did not focus explicitly on relationships between students and co-instructors in our data collection, but it did come up in one Inside student's reflection on Inside-Out. After the study period ended, Leanna, who was involved in various Inside-Out offerings for the entire eight year period of Leon's involvement, complimented Leon for her “personal growth.” Leanna noted what she perceived as a change in Leon's approach to the class, with an improved

ability to handle all the problems that pop up, including canceled classes and students missing or leaving the class. Leanna felt that this apparent “relaxation” correlated with the end of the research, stating that “[she] took it personally since it was part of the research.” Despite all the times the co-instructors stated that students were *students* first and that the evaluation study was voluntary, Leanna indicated blurring of student/research subject roles. Embedded in her compliment, Leanna seemed to believe Leon took what happened in the classroom “personally” because of the potential professional gains related to the research. This unfortunate influence of combining teaching with course evaluation both reinforces the need for the Inside-Out policy against “research” and calls into question how best to evaluate the efficacy and impact of courses.

B. Inside-Out Pedagogy Creates Relationships

Inside-Out pedagogy deliberately employs discussion and collaboration, in small and large groups, to break down boundaries between students and foster relationships. In this Section, we focus on how these intentional pedagogical choices build valued relationships that benefit all students.

From icebreakers to in class activities, early class sessions emphasize that getting to know one another is itself an explicit goal of the class. Many months after the class ended, students remembered the initial awkwardness and how quickly it transformed. Echoing what many students shared, Outside student Beth remembers the initial uneasiness faded due to the active engagement required:

... it was probably awkward at first [giggles], especially for Outside students. I think we really didn't know what to expect and we're like pretty nervous ... and obviously we wanted them to like us and have a cohesive class, but I think definitely once we had to start sharing things and going over the coursework it felt a lot easier. It felt ... honestly “closer” than any normal class. It definitely developed into a very comfortable group setting. (Beth)

Students recognized that engagement and dialogue were pivotal to the transition and overcoming their initial concerns. In fact, engaging with course material allowed Inside and Outside students to share and connect. Apart from facilitating adjustment to a nontraditional classroom setting, students shed light on the role of an engaged pedagogical style in enriching their learning experiences. Frequent interactions with each other in small and large group activities exposed students to diverse perspectives and the lived experiences of their peers. Bunny, an Outside student, described her unique learning experience as follows:

You learn about social norms and you learn about all that kind of stuff [in traditional criminology courses], but being put into a place where ... incarcerated people have a different version of that, it was nice to

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see everyone’s different perspectives of these norms I’ve never interacted with an incarcerated person before so I never really took into account how they stand on that subject versus how I stand. (Bunny)

Bunny took academic concepts for granted until the class confronted her with more nuanced and individualized perspectives made possible through the course structure.

Following the template provided by the Inside-Out Training, each course required a collaborative group project, with at least five course sessions devoting substantial time for the groups to plan, work, and review. When first introducing the project, co-instructors provided the students with the peer feedback forms that they would use to share their constructive criticism at the end, so they had built in accountability to each other. Students also came to appreciate the collaboration required to complete the final project:

I loved the group project Obviously, throughout the course, I feel like it was really well done so we all had the opportunity to work with everyone in the class at some point. The group project was more intensive. You work with this group of people more in-depth. And you have to come together in a way that was more than you usually do in a way that was just discussing answers. It was a real collaboration I felt. Obviously, I really liked the people in my group. I felt like there was, like, this desire for us all to come together and have an understanding. (Lynne Kane)

Thus, the course structure encouraged building rapport and rejecting stigma and expectations. It is worth noting that Outside students more often mentioned the stigma they had brought to the class, but Inside students also shared their preconceptions about traditional university students.⁸⁹ Such changes in their perspectives were only possible due to connections and conversations that created empathy and understanding. Lady Disco’s explanation of her experience illustrates this:

I always tell people in this class you learn in the way that you’re supposed to learn, kind of, and not only is [it] that you’re learning a lot, but you’re also doing a lot of subconscious learning when it comes to humanizing the Inside Out students, . . . breaking the stigma . . . (Lady Disco)

Lady Disco explained that her thinking about incarceration changed so much that in conversation with friends and family on the outside, she sometimes spoke heatedly without initially realizing that her stance was now personally informed and not just abstract. Students believed that having to work in a group enhanced not only their learning experience, but also enabled them to build

89. See Section III.A (quoting Pigz discussion of how Outside students moved beyond their reserved demeanor to instead feel like lifelong friends).

connections across differences. As Gray put it, students “were working for a common goal ... [to] bridge differences.” In her reflection on the group project, another Inside student expressed that she felt “impressed how it brought the class together.” Outside students echoed this sentiment, with Bunny expressing that she “expected to read and to kind of understand, like, the different parts of the books, but [she] didn’t really ... expect to grow close to the other students or anything like that.” Lavender echoed a similar sentiment, stating “[s]ince we had books to read and activities to do, I think that gave us something else to talk about, so [incarceration status] didn’t come up as much. It didn’t seem like such a stark difference. [The class] brought us together instead of bringing us apart.”

While the co-instructors explained that the course was not created as therapy or for consciousness raising, reading contemporary topics in gender, law, and justice meant that assigned readings did, at times, resonate with personal experiences that students shared in their small and large groups. Lady Disco shared, “you saw someone talk about a really traumatic experience for them [and] you felt empathy for them. So, yeah, in that way the way the class was structured was to make it so that people just focus on humanity.”

Rules prohibited any kind of touching, so when people cried or showed anger, as they occasionally did, students and instructors all felt the artificial constraints within the prison classroom. For example, when someone shared that it was the first anniversary of their infant’s death, all we could do was offer a rough brown paper towel and the chance to step into the hall to take a breath (an extreme, but not atypical situation). In another instance, when discussing readings on street based sex work, several students, Inside and Outside, made subtle references to their own involvement in different forms of sex work. This was shocking to one Inside student, who had previously shared that she was religiously and politically conservative. She initially reacted in a way that other students perceived as judgmental, leading her to leave the room in frustration and embarrassment. But, because she trusted the instructors and her peers, rather than leaving altogether, she came back in and participated in a facilitated discussion where she owned her initial reaction and emphasized her willingness to learn.⁹⁰ This created a powerful moment, only possible because of the relationships built in the class.

In response to the post class survey question, “[d]id you learn what you expected?,” Pigz, an Inside student summed it up well: “No, I didn’t expect the knowledge I gained, camaraderie, help I received, self-worth, validation. I learned what I expected and more.” Altogether, our evaluation found that Inside-

90. Over the study period, approximately four Inside students stopped attending class for unknown reasons. In one case, a student who had dropped in a previous semester was welcomed back to study a different topic in a later class, leading us to think that the course topics had some influence. We were not surprised to find that no Outside students dropped because many of them were close to graduation and were often fulfilling multiple degree requirements by taking the Inside-Out class.

Out pedagogy achieved the stated intention of creating connections among students.⁹¹

C. *Bounded Relationships in Inside-Out*

Inside-Out is a powerful educational intervention in carceral realities that otherwise work to maintain rigid boundaries between free and incarcerated, Inside and Outside. The relationships formed throughout the class are often transformative and emotional. In an attempt to address a gap in critical evaluations of Inside-Out, we describe the connections created in Inside-Out courses as “bounded relationships,” defined as the relationships formed within the physical boundaries and interpersonal regulations associated with incarceration and situated within the broader context of alienation and constrained autonomy imposed by the criminal legal system.

As Lowman explains in her analysis of poetry as means of maintaining relationships despite incarceration, “[t]he bounded connections that incarcerated poets struggle to maintain are conveyed through their writing, in their expression of subtlety and tragedy.”⁹² Inside and Outside students establish relationships knowing they are “bound” by the rules of the institution and Inside-Out pedagogy. In addition to physical boundaries and the interpersonal rules associated with incarceration, Inside and Outside students were prohibited from contact with each other when the course ended.

Our research found that these requirements impacted student experiences throughout the course and upon its conclusion. Additionally, the restrictions highlight the disparate levels of agency students have over their educational experiences. Outside students experienced a significantly wider selection of coursework beyond Inside-Out class offerings. Therefore, the Inside-Out classes with bounded relationships are a unique choice, rather than the reality of the majority of educational opportunities. The significance of these bounded relationships is compounded by the emotional impact of incarcerated students’ separation from their own communities and support systems.⁹³ Outside students

91. In the next Section, the Article further explores what we think are relatively unexamined aspects of these relationships, with implications for how we create future courses. *See infra* Section IV.C.

92. Julia Lowman, “I Am an American Feast:” Bounded Relationships Explored in the Poetry of Long Line Writer, A Prison Newsletter from the Cummins Unit Prison in Arkansas 46 (2023) (B.A. thesis, University of Delaware) (on file with author).

93. Although this Article focuses on friendship and mutual support, Lowman’s research into poetry as a means to maintain relationships finds a variety of experiences shaped by the nature of the relationships:

Romantic relationships are written about in love poems, containing the struggle and pain of maintaining partnerships while incarcerated. Poems related to fatherhood reveal shame and regret within the confines of paternal relationships, while poems on motherhood extend these feelings into a kind of worship for the mother figure. My research reveals the tenacity, empathy, and artistry of incarcerated poets within Cummins, and hopefully inspires reflection in readers.”

generally have larger social networks, and their social lives are not deeply regulated by the carceral state. Inside students lack opportunities to socialize with people (especially in the context of visitation being more rare in women's prisons than men's prisons), and thus, maintain less agency over their interpersonal relationships and experience more inherent pressure in their decisions to engage in courses that require strictly bounded relationships.

Students in the Inside-Out Course were bound by multiple sets of rules.⁹⁴ The boundedness Inside students experienced included limited access to resources like learning aids and technology, which impacted their relationship with Outside students.⁹⁵ When presenting final projects, these students were limited to the materials provided, from background research to poster board and markers. The differences in access to the internet and course resources particularly frustrated Inside students. Gray told us Inside students "don't have access to the Internet so we had to make it work with what was provided. [We are] limited to only what you give us and we know that isn't going to change." Inside students complained that the lack of resources obstructed what they could do in their groupwork, especially in a semester punctuated by frequent class sessions canceled by the prison. Tina shared: "[I felt] unhappy with the group project because [often the work had to happen] with Inside students only. Meeting with [the] group became difficult. When they did meet, they would delegate tasks with their limited resources." Unfortunately, this resource gap reinforced, rather than broke down, perceived barriers between Inside and Outside.

We already described some of the limitations of interpersonal interactions, such as the inability to offer physical reassurance during emotional exchanges. Physical and emotional boundedness was particularly salient at the conclusion of the course:

I definitely thought it was very hard at the end when we couldn't hug. Even though it was only one class a week, I still felt like all of us got really close. So, like, just having to say goodbye and [having] no further contact kind of sucks. Some of the [Outside] people in the class, I am currently in a class now with, and we talked about it the other day. I really actually kind of miss going to the prison. It is weird

Id. at 53.

94. See *Chrysanthi Leon Research*, UNIV. DEL., <https://sites.udel.edu/leon-research/resources-and-expanded-material-reading-women-dont-riot-after-the-riot-creating-a-new-university-prison-collaboration-women-in-literature-and-society-inside-out/women-in-literature-and-society-inside-out-lesson-plans/> (last accessed Nov. 19, 2023) for an example of the typical rules for Inside-Out participation.

95. It was not all scarcity within the prison, however: Outside students also noted their appreciation for easy access in the prison education wing bathrooms to pads and tampons, which are not free or even consistently available in university bathrooms. Inside students were also able to show off their hospitality each semester during a special meal their kitchen provided during our last meeting together.

to say, but I really loved it. I loved how open everyone was; they didn't hold back. (Rita)

Interpersonal stipulations within Inside-Out pedagogy created bounded relationships. Students learned together in the classroom but were unable to share personally identifying information other than first names. In apparent contrast with this rule, course discussions often became personal and anecdotal. Outside student Bunny spoke briefly about the paradox of this requirement and how it impacted relationships: “My experience overall was very positive. Umm, it was a little tricky not to get into details with them or if something came up that I wasn't sure if I was allowed to talk about it. That was a little tricky.” The complexity of sharing while remaining detached highlights divergent experiences. Outside and Inside students experience disparate realities of privacy and agency. Inspired by the readings and discussion, students made spontaneous and often difficult decisions about what to share. Inside students experienced less control over how much personal information they could share with Outside students and co-instructors. For example, despite program rules requiring first-names only, Inside students wore identification bracelets with their full names, and officers typically referred to them by last names. People inside, especially those serving long sentences, are known to the institution and to each other in ways related to their conviction and other aspects of their status with little ability for them to maintain privacy.

Inside students also had far less control over sharing their personal mental health, since the arrival of the medication cart interrupted nearly every class and singled out Inside students who needed to leave to take their medications. At times, Inside students struggling with medications prescribed through the prison apparatus left them feeling physically or mentally unwell, which was difficult to hide in the prison setting, whereas Outside students could not attend classes when they felt unwell. Similarly, Outside students wore Inside-Out shirts, creating uniformity within the subgroup and circumventing possible institutional dress code violations, but the prison would not allow us to provide shirts for Inside students to wear during class, as other prisons have. Outside student Snow found that despite these preliminarily isolating conditions, they were able to form close relationships with fellow students. Snow also expresses the transformative nature of their experience:

I think when we first started the class and we had to use first names and wear our shirts and kinda create this weird dynamic of things you don't normally think about in regular class, I was worried, I guess. But I think over time those kinda just disappear and then ... you just create these connections with people first ... I mean they're just my classmate.

Students were also “bound” within the academic term of the course because they could not stay in contact. This stipulation often meant that “the final closing

circle of an Inside-Out class is truly final, and always a difficult rite of passage.”⁹⁶ Our research supports the assertion that Inside-Out can create powerful and meaningful relationships and that separation from fellow students can leave an emotional impact. Student Elle reflected: “When I left the class I was appalled at how I’d viewed [the prison] and how the world views it and the reality and I was sad to leave my friends and I was sad that they couldn’t leave with me.”

The emotional reactions of students should be considered within Inside-Out pedagogy. Research into the impact on Inside-Out students, in particular, is essential, as the lived experiences and social status of Inside students could make the separation uniquely significant. Outside students expressed openly the difficulty of leaving their Inside counterparts, recognizing the larger implications of the physical and emotional boundedness:

I just don’t like the idea of being in prison. Like when the door shut behind us, that is not a good feeling [laughs] at all. Especially when you walk by the [groups of other incarcerated people in the] cafeteria, I felt ... I don’t want to say I felt bad for the people, it’s just, it’s rough. I can’t imagine being there every single day, all hours of the day. I can’t imagine that and not being able to see your family and all that; that’s rough. (Lavender)

At least for Outside students, the finality of the end of the class was painful and revelatory.

The way that everybody would open up their most vulnerable self and talk about these topics that were just so rough and ... they would get up in front of the class and talk about this, especially at the end and seeing people cry, including me; ... yeah those interactions really stuck out to me. (Lady Disco)

Inside students tended to respond in their follow-ups to the particular aspects of the class and on their own personal growth, rather than bemoaning the end of relationships, perhaps because for them, it is obvious and expected. As we analyzed the evaluation data and realized the significance of bounded relationships, we received permission from the prison to member check our interpretation with a few Inside students. We provided a very short written overview of what we present here and asked for written responses. We received three short responses, but they did not respond directly to our interpretation, so we think a breakdown in communication occurred, a frequent occurrence since the pandemic, which made us reliant solely on written communication mediated and monitored by the prison. That said, the Inside students shared the following: “It’s much better when we can have regular Inside-Out classes, but Zoom classes

96. Steven Shankman, *Turned Inside-Out: Reading the Russian Novel in Prison after Levinas*, in *TURNING TEACHING INSIDE-OUT: A PEDAGOGY OF TRANSFORMATION FOR COMMUNITY-BASED EDUCATION* 143, 149 (Simone Weil Davis & Barbara Sherr Roswell eds., 2013).

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are better than nothing”; “We feel invisible on the inside and the contact we have with you and the students helps us feel connected and seen”; and

The more connection we can have with the Outside students the better. Even though we didn’t have class together, I’m glad you set up the reflections so that we could each write to each other and share our reflections on the class. If you do this again, I would suggest you set up writing reflections and letters between the Inside and Outside students from the beginning and not just at the end. The more we can talk to them the better.

These perspectives make it clear that Inside-Out is meaningful and appreciated. Two of the three responses emphasize “connection,” demonstrating its salience for Inside students. We also witnessed this in the trajectory of Harmony, an Inside student who began the class very resistant, repeatedly telling the instructor that she found the readings boring and irrelevant, but on the last day, not only volunteering to read her work aloud but also bemoaning, “I don’t want this to end.” Given how Harmony emerged from her shell during the small group discussions and in collaborating on the final project, we viewed her shift as directly connected to her relationships with her peers in the class.

Inside-Out is lauded for creating impactful connections. But to date, there is a lack of insight on the bounded status of these connections and the possible implications for students. Focus should be on the Inside student perspective. Given clear emotional reactions to the conclusion of the course, a richer understanding of the emotional and psychological implications of these bounded relationships would deepen the realization of Inside-Out’s intentions.

V. CONCLUSION

Our study confirms that Inside-Out pedagogy breaks down assumptions of differences and creates transformative connections. Students empathized and shared in a way they did not expect and expressed their appreciation for being able to participate in the unique course. The pedagogy has an undeniable impact on student participants. Reid Wiley explained: “I also learned so much about these people and about all offenders—that sometimes they just need hugs and maybe therapy and what any other [messed] up person needs. Sometimes I need a hug and therapy [bursts out laughing]—like they deserve it too. That’s what the transformation was.”

Reid Wiley realized her similarity to Inside students, but we also read this as a warning to seriously consider what Inside students truly need. Clearly, a class cannot substitute for humane treatment and access to resources and prison education cannot fix the structural problems that lead to and perpetuate mass incarceration. We remain ambivalent about the bigger question as to whether a prison can ever be trauma informed, or to what extent providing for the needs of those currently incarcerated can accompany simultaneous efforts to reduce the

United States' dependence on incarceration. On the one hand, it seems clear to us that both Inside and Outside students find value, connection, and meaning in participating in a "soft" program like Inside Out in the otherwise "hard" place of the prison. On the other hand, we also must recognize that truly trauma-informed care cannot exist inside of a violent and traumatizing system that, by its very nature, functions to disrupt trauma-protective factors available to those it forcibly contains, such as social connections.

From this perspective, we see Inside-Out as a program designed with the intent to function as a non-reformist reform to the carceral state. Yet because Inside-Out programs exist only in the context of a sharing of power with the state, and in which state logics (such as relationship severing) have to be adopted by the program in order to operate, we question whether it constitutes a reformist-reform or a non-reformist reform in practice. It meets some important needs of Inside students in particular by providing spaces for connection, knowledge and experience sharing, and opportunities for social, academic, and emotional growth, thus reducing some of the harm that comes from being otherwise cut off from the opportunities of the outside world. However, it is not clear that Inside-Out is fully able to resist state and carceral logics due to its required dependency on collaboration with state and prison power holders.

Inside students are separated from their family members and communities through incarceration, leaving them with disproportionately fewer social ties than Outside students. It is important that their emotional well-being and health are considered within the reach of Inside-Out. Openness to inside points of view and their perspectives on the boundary breaking pedagogy will allow courses to be more attentive to their needs. Our stance is that the future of Inside-Out pedagogy and prison education in general should focus on Inside students' needs and perspectives.

Throughout the Inside-Out evaluation literature, instructors document the unique depth of experience created by the relational pedagogy. Since Inside-Out is itself so revolutionary, documentation of the process and of impacts on students tend towards the positive, revealing the advantages of this approach.⁹⁷ Some Inside-Out evaluation explicitly grapples with the potential confirmation bias that can plague evaluations of emergent practices and some have questioned the rules requiring bounded relationship.⁹⁸ More critical reflection is needed. For

97. See generally TURNING TEACHING INSIDE-OUT: A PEDAGOGY OF TRANSFORMATION FOR COMMUNITY-BASED EDUCATION 13, 22 (Simone Weil Davis & Barbara Sherr Roswell eds., 2013).

98. While Inside-Out is now well-established as a pedagogy, each new application of the approach in the form of a new instructor or course offering is an emergent practice or what the evaluation methodology literature calls a formative program. MICHAEL QUINN PATTON, ESSENTIALS OF UTILIZATION-FOCUSED EVALUATION 115 (Sage, 2011) (describing six kinds of evaluation, including summative, judgment oriented evaluation, and improvement-oriented formative evaluation in contrast with knowledge-generating evaluation); see Van Gundy, *supra* note 38, at 202–05, 207 (critiquing then-required exclusion of students with sex offenses and calling for abandoning no-contact rule of Inside-

example, Peterson shares her journey teaching an Inside-Out course on healing, which she initially viewed with sentimentality, but now views with more awareness of the tensions and paradoxes intrinsic to Inside-Out teaching.⁹⁹ She notes a trajectory similar to our own, partially reflected in our first two evaluation studies which are more similar to the criminological program evaluation that critical scholars warn against than we realized at the time. Describing the salience of attention to these tensions, Peterson shares:

One inside student, S., confided in me that the class offers the only two hours of light and hope in an otherwise totally intolerable and violent existence. He went on to say that it is almost too much to bear having to return to that reality after our two hours is up, almost too painful to feel that sense of freedom, connection, and healing, only to have it ripped away. He thought about this a long time, weighed whether it was actually worth it, and decided it was. Yet after our class ended, I learned that he tried to escape on two separate occasions and ended up in the hole. The enormity of this tension cannot be easily resolved.¹⁰⁰

In preparing students for the class, instructors and institutions emphasize the bounds of the relationship through clear rules and boundaries; these are enacted periodically over the course of the class and symbolized by the closing ceremony, conferring of certificates, and the meal we share together in the last session. So, when students in Inside-Out courses create connection and vulnerability, to some degree, they do so with awareness about the termination of these relationships. Our concern is whether we are obligated to make this more explicit at the outset, so that students are not taken by surprise or feel they lack the agency to engage with the course and with each other in ways that will not cause undue sadness or pain when the relationships end. Future research should continue to ask Inside students who took courses to reflect upon and consider whether it is truly the case of “the more connection the better” in this light, and to advise instructors on how to better prepare students for the end of relationships.¹⁰¹

We would also like Inside-Out to clarify how bounded relationship rules apply to co-instructors of the course, since continued relationships with co-instructors could help mitigate the sudden severance of relationships and provide

Out); *see also* Shankman, *supra* note 96 at 151–52 (demonstrating critical reflection while also celebrating a beloved Inside-Out program); Peterson, *supra* note 4, at 184.

99. Peterson, *supra* note 4, at 175.

100. *Id.* at 178–79.

101. Future research should also examine how higher education in prison must take careful account of the relationships between and among people who work in the prison, those who visit the prison to deliver course content or participate in courses, and those who are incarcerated.

academic support for Inside students.¹⁰² The Inside-Out course template currently provides for a “graduation” or “closing ceremony” in the second-to-last class, followed by a final class for debriefing. This is a thoughtful approach, but it could improve with more input from those with less access to other supportive relationships. We must recognize the value of forming “important support networks, effectively refining their ability to resist the carceral state.”¹⁰³

While Inside-Out’s rules restricting relationships serve the institutions and students well, we must revisit the foundational assumptions that led to the current rules. Some, like prohibitions on conducting “research” on incarcerated students clearly preserve relationships, but others, such as the prohibition on enrolling people with certain convictions that the Inside-Out Center has revisited and overturned, obstruct people from organizing and acting in their own individual and community interests. In a study of prison visitation in rural White prison towns, Addison found that “white residents of prison towns overwhelmingly view and discuss prisons as important state projects of safety-making.”¹⁰⁴ We see Inside-Out as potentially powerful in problematizing these assumptions, but also as potentially complicit in perpetuating related assumptions about who is dangerous and who provides safety. Recognizing the power of solidarity should always lead us to question whether we may unwittingly reinforce the carceral state in our own well-intentioned interventions. The uneasy alignments that provide prison programming in particular risk promoting “decorative justice,” which “mask[s] the injustices and painful nature of imprisonment behind claims of fairness, benevolence and care.”¹⁰⁵

However, we do not advocate against future Inside-Out course offerings. While each of us must reckon individually through working within what we may come to see as an immoral institution, and while it is worthy to balance prison education with more radical work that will render the carceral apparatus unnecessary, we believe it is paternalistic to remove this kind of opportunity from incarcerated students who repeatedly emphasize its value, as evident in our own evaluation and throughout related literature. Inside-Out is an ideal mechanism for transformative educational praxis, in which we

can create a container for difficult conversations by signaling expectations for listening, openness, and empathy The practice of unmasking foundational human needs will create a space for deeper listening and greater connection across difference in both the context

102. All of the Inside students who participated in our study showed great academic and leadership potential. Severing relationships with co-instructors means Inside students lose access to those who can support them academically and professionally.

103. Addison, *supra* note 33, at 27 (describing prisoner visitation); *see generally* Cheliotis, *supra* note 2 (detailing exploitation as well as camaraderie and resistance possible within prison programming).

104. Addison, *supra* note 33, at 121.

105. Cheliotis, *supra* note 2, at 17.

of the classroom conversation itself and in the urgent work of examining dynamics of harm and punishment.¹⁰⁶

We believe in this urgent work and that Inside-Out can be part of it, but we do not believe Inside-Out is a panacea. We are working on our own campus to provide a broader menu of educational offerings that do not depend exclusively on the Inside-Out model, including those that are designed and offered to incarcerated students only, in order to meet their expressed needs. We join other scholars of prison education who previously documented the “power of relationship building for incarcerated individuals”¹⁰⁷ and call for careful attention to the impact of bounded relationships on students, especially Inside students, and for instructors to bring that awareness forward into pedagogy, evaluation research, and the design of prison/university partnerships. Future research must also examine differential barriers to access for prison education, especially as it varies by race and ethnicity, immigration status, and gender,¹⁰⁸ which our small sample prevented us from addressing, but nonetheless needs documentation to fully weigh the implications and impacts of supporting prison education at the risk of legitimizing racist systems of control.

Returning to the broader context of uneasy alignments, we remain uneasy with alliances between coercive systems. Peterson cautions,

While ever powerful, when the community we build inside the classroom dissolves, individuals are left alone to battle structures that have not made the same transformations they have. This illuminates an age-old argument about the limits of internal transformation against a backdrop of systemic oppression.¹⁰⁹

As we consider other examples of soft spaces within hard systems, especially those that provide mental health assessment or treatment to people made

106. Jobe et al., *supra* note 35, at 404.

107. Flores et al., *supra* note 45, at 5.

108. Niness, *supra* note 55, at 11. Despite the overrepresentation of White Inside students in our classroom, there is surprisingly positive data on trends in differential access from emerging research. Analyzing the 2016 Survey of Prison Inmates, Niness finds that

members of minoritized groups are reporting significant levels of involvement compared to their counterparts holding less stigmatized, and perhaps more advantageous, identities. This does not mean research on participation, the expansion of access to programming, or the removal of barriers related to persistence and completion should end. On the contrary, incarcerated people with violent controlling offenses are likely still facing such issues. Identifying as queer, not being a United States citizen, and not holding a high school degree were also negatively associated with participation and require further investigation into if this trend persists today and into why this might be. The 2016 Survey of Prison Inmates is now six years old, and since its release, the world has experienced a global pandemic which greatly affected incarcerated populations. A future avenue of research will need to explore program participation of incarcerated adults following this global catastrophe to assess who is and is not involved in education courses now.

Id. at 30–31.

109. Peterson, *supra* note 4, at 179.

marginal through social structures and criminal legal systems, where do we intervene? Do we choose to make more humane what we can, while also working outside these systems to dismantle them? Is it really possible to do both of those things?

The interim approach we now employ is to keep the most directly impacted at the center as best we can. Too often, researchers, academics, and advocates attempt to provide a “voice for the voiceless,” and instead, reinforce that community’s silence; research often lacks contextualized information, giving an audience “just enough information to do harm.”¹¹⁰ As we model in this analysis, rather than hide behind our qualms, we bring our perspectives and research tools and we remain engaged, we listen, and we keep working at the micro level, as well as the meso and macro levels. There are several directions which future research can profitably take. However, methodologically, our findings on the value of relationships and our attention to the pitfalls of confirmation bias together point to the importance of research that is led by those who are directly impacted. While difficult to organize, participatory action research and relational methodologies are necessary to overcome confirmation bias and address power differentials.¹¹¹

110. Kate D’Adamo, *Sex (Work) in the Classroom: How Academia Can support the Sex Workers’ Rights Movement*, in CHALLENGING PERSPECTIVES ON STREET-BASED SEX WORK 195, 195, 196 (Katie Hail-Jares et al. eds., 2017). Katie D’Adamo is a partner at Reframe Health and Justice, a queer and trans people of color collective working at the intersections of harm reduction, healing justice, and criminal-legal reform. D’Adamo offers specific, actionable steps that foster equitable community/academic partnerships and minimize the extractive nature of scholarship, including: “The first question of every social science researcher should be ‘How can I serve you?’ not ‘How can you further my career?’ It is not a privilege to be researched.” *Id.* at 199. Future research should attempt the truly co-creating approach to research that Addison pioneered in their collaborative study on prison visitation. *Id.*

111. Plemons, *supra* note 40. Cheliotis cautions, prisoners may come to develop feelings of gratitude toward their instructors and judges, just as they may treat the inferior cultural identity ascribed to them as legitimate. But this is perhaps best understood as the result of successful ideological incorporation—as ‘false consciousness’—rather than indicating an environment of care and fairness. Cheliotis, *supra* note 2, at 23; *see also* Evans, *supra* note 39, at 4–6.