STUDENT PAPER:
RECONSIDERING PRISON INDUSTRY PROGRAMS IN AMERICA AND THEIR VALUE TO PRISONER REENTRY

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Introduction

Prison work programs have had a turbulent history within the United States. Starting from the Revolutionary period onwards, American prisons have used, indeed depended upon, prison labor to perform cleaning, maintenance, laundry, cooking and medical orderly jobs inside prisons for no or very little pay. Particularly but not exclusively in the south prisoners have been employed on road or “chain” gangs; more recently to fight fires in states such as California or clean up after national disasters in many states.

Despite objections on economic and moral grounds, prisons in different regions of the country assigned inmates to perform work for private individuals and private industries. Today there are two different program that permit prisoners to work for private businesses: the Federal Prison Industries (“FPI”) program, and on the state level, the Prison Industry Enhancement (“PIE”) program (sometimes referred to as “PIEP.”) Both programs have in recent years seen a decrease: in work contracted out to the FPI and in the number of state prisoners engaged in PIE programs.

This paper examines the history of prison labor and private industry. Recent studies and analysis of state PIE programs supports an argument that employment with private industries can help in prisoner rehabilitation. Additionally, studies show that some private businesses can gain economic advantage by operating within prisons or by employing prisoners temporarily outside of prison on work release. Combine these advantages to the expectation that holding down a job in a private business or industry teaches employable skills, and one might ask why prison industry programs are not more widely adopted.

The History of Prison Work Programs Involving Private Industry in the United States

Prison work programs have had a lengthy and tumultuous history in the United States. In the late 18th century, American independence from the British also meant the repudiation of the “British legacy of sanctions such as fines, whippings, mechanisms or shame such as the stock and public cage, banishment, and the gallows.”1 In the late 1700s Americans began to believe that prisoners could be rehabilitated through labor.2 Inmate idleness was thought to cause deviant behavior; prison labor was considered “necessary to instill discipline in the inmate and to set him onto the path of righteousness through an institutional routine.”3 During this era, another primary objective of prison labor was for the moral rehabilitation of the prisoner. The fact that a prisoner’s labors offset the cost of incarceration was a secondary consideration.4 Commentary from the 19th century recognized the positive effects that prison labor had on prisoners who were reentering into society: “It is productive, it is healthful, it teaches convicts how to support themselves when they leave prison, it is reformatory, and is consonant with republican.

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2 Id.
principles.”\(^5\) Though decreasing idleness and instilling discipline were major goals, these aims seemed to have a positive effect on the rehabilitation and reentry of prisoners.

In the 1820s, two prison models emerged that employed prison labor. Though both systems emphasized physical labor, there were important differences which would later lead to the introduction of private industry into prisons. In Pennsylvania’s “separate” system, prisoners labored in complete isolation. By contrast, in New York’s “congregation” system, prisoners labored communally and were apart only during nighttime.\(^6\) Eventually, the congregate system became the model of how prison labor programs would be run and it “established the pre-requisites necessary for the introduction of private enterprise into the penitentiary setting.”\(^7\)

Because Pennsylvania’s “separate” system emphasized complete isolation, introducing industrial techniques into the prison was limited to handicraft of an artisan nature. Working individually, prisoners could hardly become a competitively productive labor force. Nor were they learning skills that would be useful to them outside of the prison system. From a “penological point of view, the system did not serve its therapeutic function because the ‘uneconomic nature of the work . . . diseducated the inmates, thus reducing their original working capacities.’”\(^8\)

In contrast, in the “congregate” system, prisoners worked communally. “Reform of the prison depended on training in the latest means of factory production.”\(^9\) Legislatures and policy makers realized the benefits of a system that could serve both rehabilitative and financial goals; by the mid-nineteenth century, the congregate system had emerged as the preeminent model for a penitentiary.

The interaction between prison industries and the private sector differed greatly between the Northern and Southern states during the nineteenth century. In the north, corrections used the contract system. Private industries would contract with the prisons officials, who then managed the work that the prison inmates completed within the confines of the prison. In the south, corrections used a lease system, which differed from the contract system in that most inmate labor was performed outside prison walls. Of great importance, under the lease system prison officials gave up direct supervision of prison inmates while they were performing labor under the oversight of private industry.\(^10\)

In a third system, called “state use” or “public account,” the prison retained complete control of the inmates. The state also retained control over the goods entering the market by “establishing its own labor standards and producing goods later absorbed by the states rather than the free market.”\(^11\) Initially the state use system was the least popular of the three. It required significant capital investment at the outset to establish new prison industries. An insufficient

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6 Supra, note 3 at 413-14.
7 Id. at 415.
8 Id.
9 Id. at 415.
10 Id. at 415-16.
11 Id. at 416.
number of experienced prison officials were capable private entrepreneurs. However, over time, opposition to the contract system in the north led to an increase in the state use model.

Opposition to the use of prison labor in industry came from organized labor. “As labor unions began to grow and coalesce in the latter part of the nineteenth century, the pressure to end the leasing and contracting of prison labor intensified.” Organized labor objected to the contract system when it failed to “elevate the price of prison labor to the level of free-market wages.” Unions were displeased with the competition posed by prison laborers who were available to work at lower wages. Prison industry and prison labor became political issues.

State lawmakers however, were reluctant to lose profits from prison industries. Wardens and prison reforms also supported the contract system. “Abolishing it, they feared, would force the prisoners into idleness and … [destroy] any hope of reform.”

However, economic depressions in the 1870s and 1890s led to the intensification of labor unions’ efforts to end prison industry programs. As a result, a modification to the state use system gained prominence: “Prisoners would still work, but the state would be the only buyer of their labor and the only market for their goods. The state-use system meant that free workers would no longer be forced to compete with prisoners for private-sector jobs and that prison-made goods would no longer compete with free labors’ goods on the open market.”

In the South the lease system also declined, though haltingly, coming close to ending by 1933. Unions had also opposed convict labor in the South, and in addition there were increasing reports of severe abuse on prisoners who were leased to private industry:

In the South, problems of inmate exploitation were exacerbated by a preexisting heritage of slave practices. Additionally, because the lease system entrusted complete control over the inmate to the private contractor, many times the inmate was fortunate to have survived the ordeal.

As corrections’ use of the lease system decreased due to mounting pressure, southern states also moved to the state use model.

However, even the state use system, which closed the market of prison made goods for sale only to the government, was not enough to save prison work programs. The unprecedented levels of unemployment stemming from the Great Depression combined with a resurgence of moral arguments against contracting out prison labor resulted in a push for federal legislation to end private sector involvement in prison industry. Congress started enacting laws restricting the role of the private sector in prison industries.

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12 Id.
14 Id. at 358.
15 Id.
16 Id. at 359.
17 Id.
18 Id. at 362-363.
19 Id. at 363.
20 Supra, note 3 at 417.
21 Id. at 418.
In 1929, Congress passed the Hawes-Cooper Act, which “mandated that prison-made goods transported from one state to another were subject to the laws of the importing state,” meaning that a state could prohibit the sale of prison-made goods whether produced by prisoners in or out of state.22 The Ashurst-Sumners Act followed in 1935, making it a “federal crime to transport prison-made goods into a state that prohibited their sale.”23 In 1940, Congress passed an amendment to the Ashurst-Sumners Act, which made the “interstate transport and sale of prison-made goods a crime regardless of state laws.”24 These laws effectively put an end to private industry’s employing state prisoners.

However, the prison industry survived at the federal level through the Federal Prison Industries (FPI).

**History of Federal Prison Industries (FPI)**

In 1918, Congress had authorized locating two factories in federal prisons that would manufacture and sell products exclusively to federal agencies.25 In 1930, Congress passed legislation which allowed for the expansion of such prison labor to all federal prisons. This type of labor would be restricted in two ways. First, goods produced by the inmates would be for sale to the federal agencies and would not be “for sale to the public in competition with private enterprise.”26 Secondly, the 1930 Act also stated that “FPI shall ‘provide employment . . . in such diversified forms as will reduce to a minimum competition with private industry or free labor.’”27 In 1934, Congress further authorized the program and renamed it Federal Prison Industries.28 A nonprofit corporation, Federal Prison Industries is also known by its trade name, UNICOR.29

With the start of World War II, FPI’s sales increased to meet the demands of the military. Since the end of the war, “FPI’s sales and the number of inmate employees have coincided with the growth of the federal prison population, although the number of inmate employees has dropped sharply in the past several years.”30 A reported 17.9% of all inmates participated in FPI in 1940; 18% of eligible inmates participated in FPI programs in 2004 but in the years that followed, the numbers remained the same despite the increasing number of available inmates.31

Currently, the work that prison inmates perform through UNICOR/FPI is diverse. FPI has eight business groups: Clothing and Textiles; Electronics; Fleet Management and Vehicular Components; Graphics; Industrial products; Office Furniture; Recycling; and, Services.32

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22 Id. at 419.
24 Id.
25 Id. at 677.
26 Id.
27 Id.
28 Id; see also Act of June 23, 1934, ch. 736, s. 2, 48 Stat. 1211, 1211 (1934).
29 Supra, note 13 at 370.
30 Id.
31 Supra, note 26 at 678.
“Services” means that FPI now “sells services to private sector businesses as well as the Federal Government” and sales by this group alone amounted to $13.5 million in 2004. FPI is the 32nd largest contractor to the federal government, exceeding sales of companies such as Exxon-Mobil and General Motors Corporation.

Until 2001, FPI’s position was assured because Congress gave it: mandatory source status with regard to all federal contracts…require[ing] that all federal agencies purchase from FPI any item listed in FPI’s Schedule of Products as long as FPI meets the agency’s delivery schedule needs, the products meet the agency’s requirements, and the prices do not exceed current market prices.

However, the Consolidated Appropriations Act for Final Year 2005 altered the mandatory source provision by requiring that all federal agencies conduct their own market research before purchasing from FPI.

Before purchasing an item of supply listed in the FPI Schedule, conduct market research to determine whether the FPI item is comparable to supplies available from the private sector that best meet the Government’s needs in terms of price, quality and time of delivery. This is a unilateral determination made at the discretion of the contracting officer.

After 2005, government agencies had the authority to choose FPI or another contractor making the same goods on a competitive basis. And as regulations provide no guidance as to what makes products “comparable,” federal agencies have had considerable discretion to purchase their goods and services from other sources than FPI.

The case for FPI

Proponents of FPI/UNICOR can point to a variety of reasons to keep the program in operation which will benefit society and the prisoner inside and outside of the prison system.

First of all, the mission of Federal Prison Industries, Inc. (FPI):

…is to employ and provide job skills training to the greatest practicable number of inmates confined within the Federal Bureau of Prisons; contribute to the safety and security of our Nation’s federal correctional facilities by keeping inmates constructively occupied; produce market-priced quality goods and services; operate in a self-sustaining manner; and minimize FPI’s impact on private business and labor.

Prison labor through FPI/UNICOR is thus supposed to serve reentry and rehabilitation purposes:

FPI is, first and foremost, a correctional program. The whole impetus behind Federal Prison Industries is not about business, but instead, about inmate release preparation.... helping offenders acquire the skills necessary to successfully

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33 Id.
34 Id at 679.
35 Id.
36 Id. at 680 (quoting FAR 8.602(b) (1)).
make that transition from prison to law-abiding, contributing members of society. The production of items and provision of services are merely by-products of those efforts.38

Advocates of FPI posit that inmates who work in prison lead lives with greater dignity behind bars.39 FPI claims to train inmates for “life in the real world.”40 FPI program are said to aid rehabilitation and reentry goals by teaching inmates “pro-social values including the value of work, responsibility, and the need to respect and work with others.”41 By building employable skills while inside prison through working through an FPI program that can be used to attain employment once released, a former prisoner also would be less likely to recidivate.

Research has demonstrated that participation in prison industries and vocational training programs has a positive effect on post-release employment and recidivism for up to 12 years following release. According to one study, inmates who worked in prison industries or completed vocational apprenticeship programs were 24 percent less likely to recidivate than non-program participants and 14 percent more likely to be gainfully employed.42

UNICOR and the Bureau of Prisons have been criticized for failing to help connect ex-offenders with employment once they leave prison. In response, FPI/UNICOR took steps to help inmates rehabilitate and became able to re-enter into society. In 2004, FPI/UNICOR established the Inmate Transition Branch, which has the mission to “strengthen existing and establish new Bureau of Prisons programs that enhance the post release employment of federal prisoners and the use of community, staff and inmate volunteers.”43 The Inmate Transition Branch (“ITB”) helped individual federal prisons conduct mock job fairs to help prepare inmates for real job interviews. Additionally, ITB establishes employment resource centers (ERCs). ERCs help inmates “prepare for job searches and to assemble [job folders containing] all documents required by employers who may hire them.”44 UNICOR/FPI itself stresses the important of “motivating inmates to focus on their transition to employment, their families and their communities at least 18 months before their expected release dates.” Since 1996, ITB has helped with 500 job fairs in 107 federal prisons serving more than 17,500 inmates.

UNICOR and federal prison industry programs claim also to have benefitted private industries: “During FY 2009, FPI purchased more than $576 million in raw materials, supplies, equipment, and services from private sector businesses. More than half of these purchases were from small businesses, including women and minority owned and disadvantaged businesses.”45

39 Supra, note 23 at 682.
40 Supra, note 23 at 682.
41 Supra, note 43.
42 Supra, note 43.
44 Id.
45 Supra, note 38.
Criticisms of FPI

In 1980, as FPI sales rose dramatically along with the size of the prison inmate population; private industry called for an end to growth in FPI. “Opponents of FPI include large labor unions such as the Teamsters, private industry organizations such as the Chamber of Commerce, and representatives of the furniture and textile industries.” These groups argued that FPI’s unique status as a mandatory source (even with the market research requirement) has resulted in fewer opportunities for private businesses seeking federal business opportunities and their non-inmate workers. In response, FPI’s proponents argued that, despite its size, FPI sales to the federal government represented less than 2% of all federal procurements, and three-quarters of the federal prison population remains without work… [Also,] to keep FPI’s success in economic perspective, bear in mind that the incarceration costs of FPI’s inmate workforce totaled almost $200 million in 1993.

Critics also argued that the products FPI provides federal agencies were not a good value.

Opponents of FPI challenge FPI’s entry into the private services industry, especially as inmates are paid significantly below minimum wage. Opponents also contend that vocational and apprentice programs are more effective in reducing recidivism than participation in an FPI prison labor program, citing studies that conclude that the recidivism rate for inmates who participated in vocational and apprenticeship program was 24% compared to a 33% rate for inmates who worked for FPI.

Prison Industry Enhancement Program (PIE Program)

Though Congress effectively ended state prison programs by passing the Hawes-Cooper and Ashurst-Sumners Acts following the Great Depression, by the 1970s and 1980s there was a resurgence in interest in state prison labor programs. Proponents were unhappy with attempts to rehabilitate prisoners through psychological treatment and therapy which some viewed as a “con-game.” Probably of more importance, fiscal considerations led many states to modify their stance on private sector use of prison labor. In 1979, Congress authorized the Prison Industry Enhancement program under the Justice Improvement Act. The program was revised in 1984, and amended again under the Crime Control Act of 1990, which allowed the program to continue indefinitely. Though not fully repealing the Ashurst-Sumners Act, the “PIE program provides

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46 Supra, note 23 at 684-85.
47 Id. at 685.
48 Id.
49 Supra, note 13 at 371.
50 Supra, note 23 at 685.
51 Id.
52 Id. at 685.
53 Supra, note 3 at 419.
54 Id. at 419-20.
55 Id. at 420; see also Justice System Improvement Act, Pub. L. No. 96-157, S. 827.
limited deregulation of federal prohibitions affecting both the movement of state prison-made goods in interstate commerce and the ability to use prison made labor in government contracts in excess of $10,000.”

The PIE program provides meaningful work opportunities for inmates at the state level, “thereby reducing inmate idleness, increasing job skills, and providing an opportunity of rehabilitation.” The program achieved initial success and Congress gradually expanded the number of allowable certifications from an initial seven pilot states to fifty jurisdictions. As a result, all products produced through the PIE program can enter interstate commerce.

In order for a state prison program to become eligible to participate in PIE, it must meet all of the following requirements:

1. Pay offenders either the prevailing wage in the free market or the minimum wage, whichever is higher
2. Provide a financial contribution to victim’s compensation or victim’s assistance programs;
3. Consult with organized labor and local businesses that might be affected by the industry prior to start-up;
4. Provide assurance that inmate labor will not displace workers in the free society;
5. Provide for worker’s compensation;
6. Provide assurance that offender participation in the program is voluntary and that the workers agree to specific deductions from wages; and
7. Involve the private sector

PIE programs differ from the FPI program in one marked way. “To participate in the PIE program a firm must pay prisoners ‘wages … which [are] not less than th[ose] paid for work of a similar nature in the locality in which the work is performed,’ i.e. the prevailing wage rate, and must demonstrate that inmates will not displace free labor.” Currently, 41 jurisdictions are participating in the PIE program and collaborate with 175 private sector businesses. “As of September 30, 2005, [PIE] generated more than $33 million for victims’ programs, $21 million for inmate family support, $97.5 million for correctional institution room and board costs, and $46.6 million in state and federal taxes.” The PIE program also generates funds for victims programs in addition to offsetting the costs of incarceration.

PIE is operated with the technical support of the National Correctional Industries Association (“NCIA”), a professional organization for prison industry employees which “audits

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57 Id.
58 Id.
59 Id. at 421.
60 Supra, note 13 at 372.
62 Id.
program participants for compliance with program requirements and provides onsite and telephone technical assistance to programs that are not in compliance.”

The case for PIE programs

Proponents of PIE point to the goals of rehabilitation and reentry to justify the program. The PIE program “attempts to achieve its goals of cost savings and rehabilitation by replicating, to the extent possible, a real working environment that treats inmate workers as free workers would be treated.” PIE is a unique program among prison labor models, many of which emphasize retributive forms of punishment through prison labor such as chain gangs. In retributive forms of punishment, the goal is to emphasize shame and misery through prison labor so that prisoners will be deterred from going to prison since life as an inmate is so unpleasant and miserable. The PIE program does not focus on punishment; instead, it can be seen as being forward facing. By placing inmates in real life working situations by involving prisoners in working relationships with private sector businesses, participation with PIE can help to prepare prisoners re-enter into society.

Additionally, proponents of the program believe that recidivism will decrease as a result of participation with PIE. “[I]t is less likely that a released inmate will seek to satisfy his economic needs through illegal means after release because he will have skills that should enable him to successfully participate in a job market. Work as punishment is less efficient that work as rehabilitation because society gains nothing from having inmates engaged in unproductive work.”

Businesses can also benefit from using prison labor. “The principal economic benefit is free use of space and utilities because of the availability of an existing facility.” Businesses will also benefit from personnel costs due to lower health insurance. Companies who have seasonal labor needs can also look to prison labor as an attractive work force as the need to retrain the labor force each year is reduced. Prison labor is also attractive to companies who require employees with particular shift demands that are difficult to fill, such as weekends or nights.

Criticism of PIE programs

However, businesses face hurdles to working with the prison labor force as well. Some of these problems are administrative in nature, due to the fact that the prison administrators and businesspeople can see their roles as conflicting. Another problem is dealing with the inmates who pose training problems because “they typically lack the most rudimentary job skills. Even

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64 Supra, note 3 at 423.
65 Id. at 423-24.
66 Id.
67 Supra, note 3 at 430.
68 Id. at 430.
69 Id.
more fundamentally, however, inmates are generally undisciplined, addicted to drugs or alcohol, and unable to postpone their desires for immediate gratification.”

Critics of PIE will also point to the fact that the program seems to impact so few prisoners and therefore the program is ineffective. In 1995, PIE only affected 0.18% of prisoners in state prisons.70 A 2003 report stated that only 5,000 prisoners participated in the program.71

Current PIE Program Operations

In a study commissioned by the Workman Fund, a non-profit organization set up in Kansas, six prison labor programs (operating under PIE legislation) were studied in order to evaluate the incremental labor costs from utilizing incarcerated workers.72 The study found incrementally higher labor costs of a private sector prison industry enterprise which it attributed to sub-standard productivity of inmate workers, additional supervisory staff and administration to comply with prison regulations, and the political and market risks associated with business conducted inside a prison.73 However, the study found that savings attributed to higher labor productivity could alone offset labor incremental costs.74 Of the six programs evaluated, four programs involved the use of inmate labor by private enterprise inside medium or maximum security prisons.

The results of the study are surprising. In a program which used inmate labor for jobs with a higher learning curve (that is, requiring more training and acquisition of skills before becoming profitable) the inmates participating in the program were found to be overqualified and extremely motivated. The study pointed to the fact that inmate competition for few positions available in the prison labor programs was fierce; thus the most qualified inmate applicants were given the jobs.75 Additionally, inmates wanted the jobs working with private sector employment to decrease their level of idleness and feel productive. In fact, participating in the labor program and having the opportunity to work was seen as a privilege and gave “a majority of inmate workers a strong motivation to behave and perform well to ensure that the privilege to work continues.”76 Due to the superior pool of inmate applicants and the motivation to work, private enterprise enjoyed a lower turnover rate for inmate labor versus the industry turnover rate for non-inmate labor. For private enterprise, this is a significant benefit as training new workers can be very costly in terms of administrative and financial resources.

In all four programs which had private enterprise employing inmate labor inside the prisons, workers were found to be equal to or more productive than non-inmates would be at the same tasks.77 For the three program models with shorter learning curves, it was also found that

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70 Supra, note 16 at 374.
71 Supra, note 4 at 1163.
72 The Workman Fund, Inmate Labor Costs, May 1999, page 3. Incremental labor costs were described as the difference, either costs or saving, of employing inmate workers as opposed to hiring non-inmate workers.
73 Id.
74 Id.
75 Id. at 30. In this program model, only 20 out of 100 inmates were recruited following an exam.
76 Id. at 31.
77 Id. at 5.
companies do not incur significant incremental labor costs—in fact, companies enjoyed receiving incremental benefits from these workers due to their higher level of productivity.\textsuperscript{78} Thus the bottom line: additional administrative costs of operating private business in a prison setting were found to be offset by the increased level of worker productivity.\textsuperscript{79}

The study thus shows that private businesses operating inside the prison setting benefit economically when utilizing inmates for tasks with a small learning curve, such as machine operation. Additionally, private enterprise that employs a superior pool of motivated applicants in jobs having a high learning curve also have an economic incentive to work with prisoners as this program was also shown to yield equal or better results than their non-offender counterparts.

\textbf{Recommendations}

The history of prison labor and the FPI and PIE programs show that concerns over the preservation of jobs and potential competition between the private and prison industries must be balanced with the social goal of rehabilitation of the prisoner who will re-enter the community.

The explosion in prison populations following 1973 until 2010 and the resulting increase in releases from prison to more than 650,000 inmates annually calls for further consideration of an expansion in PIE programs, which only impacted 5,000 inmates in 2003 and has remained fairly stable at that low number since. The benefits to the inmate derived from the real world working environment in which PIE helps to foster should be adopted by more state prison facilities.

One avenue to expanding PIE would be a repeal of the Ashurst-Sumners Act. “States and the federal government should, moreover, consider repealing legislative restrictions on the open market sale of prison-made goods so as to further involve the private sector.”\textsuperscript{80} Broadening the scope of the market for goods and services produced by PIE programs could allow for greater participation by an increased number of inmates.

Under PIE requirements, private enterprises involving prison labor is not supposed to contribute to local job displacement. Instead, an industry that employs prisoners might well result in the strengthening of local area small businesses which provide goods to help operate the prison labor programs.\textsuperscript{81}

In response to concerns of those who fear that jobs going to prisoners will deprive the opportunities of local workers the case might be made that incentives provided to private enterprises operating PIE programs could result in keeping jobs in America instead of outsourcing jobs overseas. As an incentive to stop private sector businesses from outsourcing projects and going overseas, “subsidized space or tax credits should be offered to businesses that choose to locate inside prisons”\textsuperscript{82} just as state and local governments use other tax breaks, infrastructure construction and subsidies to attract businesses to a locality.

\textsuperscript{78} Id. at 52.
\textsuperscript{79} Id.
\textsuperscript{80} Supra, note 3 at 435.
\textsuperscript{81} Supra, note 38.
\textsuperscript{82} Supra, note 3 at 455.
Combined with the increased productivity of a workforce these economic considerations suggest that for some industries and in some communities a prison industries program would be beneficial for private enterprise and economic development.

However, economic considerations are not the only ones to take into account. The community at large will benefit from prison industry programs which greatly help to rehabilitate prisoners, leading to lower rate of recidivism once ex-offender re-enter into society. The opportunity to work full time in a real-work setting, while building skills such as punctuality, communication, and teamwork, will serve to aid the ex-offender when looking for a job outside of prison. It allows the inmate to have current work experience on his resume, and shows that he can cope with real world working conditions and responsibilities. A key re-entry goal is satisfied, and the safety of communities improve when prisoners with job-ready skills are released due to their participation in a real life work setting through PIE, instead of prisoners who had been locked up and idle. However, it is important that PIE programs be augmented by a corrections-based effort to help connect ex-offenders with employment as they return to their communities.

As the economy declines and unemployment rates continue to be on the rise, it will be interesting to see whether the political sentiment turns against the FPI and PIE programs, or if these prison programs will continue surviving for the betterment of prisoners as well as society.