United States General Accounting Office

GAO

Report to the Chairman, Committee on the Judiciary, House of Representatives

March 2004

GRANTS MANAGEMENT

Despite Efforts to Improve Weed and Seed Program Management, Challenges Remain

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GAO-04-245

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Highlights

Highlights of GAO-04-245, a report to the Chairman, Committee on the Judiciary, House of Representatives

Why GAO Did This Study

The Weed and Seed program, within the Department of Justice's Office of Justice Programs (OJP), aims to prevent and reduce violent crime in targeted neighborhoods, but it cannot optimize its effectiveness without sound management practices. In 1999, GAO made four recommendations to the Executive Office for Weed and Seed (EOWS) to improve the program's management, including (1) developing adequate internal controls to fully document decisions, (2) improving program monitoring, (3) developing criteria for determining when sites have become self-sustaining and when to reduce or withdraw program funding, and (4) developing additional performance measures. GAO did this study to assess progress in implementing these recommendations.

What GAO Recommends

GAO recommends that the Attorney General require the Assistant Attorney General for OJP to ensure that the Executive Office for Weed and Seed fully implement the intent of GAO's previous recommendations.

In commenting on a draft of this report, the Department of Justice agreed to strengthen controls on maintaining documentation and take further steps to define and apply criteria for self-sustainability. Justice believes that the studies currently under way will help develop outcome measures.

www.gao.gov/cgi-bin/getrpt?GAO-04-245.

To view the full product, including the scope and methodology, click on the link above. For more information, contact Laurie Ekstrand at (202) 512-8777 or Ekstrandl@gao.gov.

What GAO Found

Despite some progress toward addressing GAO's recommendations aimed at improving program management, GAO's review shows that EOWS has not fully implemented the management improvement recommendations GAO made in 1999. First, although EOWS has revised its internal controls to require that significant qualification and funding decisions be documented and readily available in the central grant files for review, EOWS has not always ensured that its policies and procedures were followed, for the grant files GAO reviewed. Second, EOWS reported taking a number of actions intended to improve program monitoring, such as mandating the timely submission of progress reports and adequate recording of site visits as GAO recommended. Nonetheless, GAO found that while EOWS was able to provide such documentation before its review ended, documentation was not available in some of the central grant files GAO reviewed. Thus, the documentation was not readily available for external reviewers, as required by OJP policies and GAO's internal control standards. Third, GAO found that EOWS still lacks fully developed criteria to determine when sites become self-sustaining and when to reduce or withdraw Weed and Seed funds because of the level of sustainability, even though sustainability is a central goal of the program. At the time of GAO's review, no site's funding had been reduced or withdrawn because of sustainability during the 13 years of the program's existence. Fourth, EOWS has not developed outcome performance measures that can be used to adequately track progress toward program outcomes of the Weed and Seed program. While EOWS has initiated studies on how to develop performance measures, at the time of GAO's review, none of these studies had been completed. Without requirements to monitor improvements and assign accountability, progress will be difficult to achieve.

A sign displayed in front of a school in a Weed and Seed site.

Source: EOWS and GAO.

Contents

Letter 1

Results in Brief 2
Background 3
Internal Controls Have Been Developed, but Challenges Remain 7
EOWS Has Taken Steps to Improve Program-Monitoring Documentation, but Challenges Remain 9
Despite Some Steps, Challenges Remain in Developing Criteria for Self-Sustainability 11
Performance Measures Generally Did Not Track Program Outcomes 12
Conclusions 16
Recommendations for Executive Action 17
Agency Comments and Our Evaluation 17

Appendix I **Scope and Methodology** 21

Appendix II **GAO Site Visit Summary** 24

Appendix III **Proposed Legislation Could Affect Self-Sustainability** 29

Appendix IV **Executive Office for Weed and Seed Selected Activities** 31

Appendix V **Activity Data Collected by EOWS in Fiscal Year 2003** 34

Appendix VI **Description of EOWS's Ongoing and Completed Studies** 36

Appendix VII **Comments from the Department of Justice** 37

Appendix VIII **GAO Contacts and Staff Acknowledgments** 42

GAO Contacts 42
Staff Acknowledgments 42

Related GAO Products 43

Tables

Table 1: EOWS Funding History for Fiscal Years 1999-2003 4
Table 2: Sites' Weed and Seed Funding History—Fiscal Years 1999-2003 24
Table 3: Examples of Activities Funded by Weed and Seed in Pittsburgh, Charleston, and North Charleston 27
Table 4: Examples of Leveraging Efforts at Weed and Seed Sites in Pittsburgh, Charleston, and North Charleston 28

Abbreviations

AAG	Assistant Attorney General
COPS	Community Oriented Policing Services
DFCSP	Drug-Free Communities Support Program
EOWS	Executive Office for Weed and Seed
FBI	Federal Bureau of Investigation
FY	fiscal year
GMS	grant management system
GPRA	Government Performance and Results Act
HUD	Housing and Urban Development
JRSA	Justice Research and Statistics Association
OJP	Office of Justice Programs
OMB	Office of Management and Budget
OR	official recognition

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G A O
Accountability * Integrity * Reliability

United States General Accounting Office
Washington, DC 20548

March 24, 2004

The Honorable F. James Sensenbrenner, Jr.
Chairman
Committee on the Judiciary
House of Representatives

Dear Mr. Chairman:

The Department of Justice's (Justice) Weed and Seed program proposes to "weed" out crime from targeted neighborhoods and "seed" them with a variety of programs and resources to prevent crime from recurring. Weed and Seed sites have sponsored activities such as police bike patrols, community cleanups, youth and recreational activities, and computer training. According to Justice, a central tenet of the Weed and Seed program is for local Weed and Seed sites to develop partnerships with other federal, state, and local governments and private sector agencies to leverage federal Weed and Seed grant funds with additional resources from these partners to promote weeding and seeding activities. These additional resources are intended to help the sites achieve the goal of becoming self-sustaining after Weed and Seed funding ends and to sustain crime reduction and community revitalization activities to ensure stable communities.

This report responds to your request to assess the Executive Office for Weed and Seed's (EOWS) efforts to implement the management improvement recommendations we made in 1999.[1] It is not intended to evaluate the overall management or results of the program. In our previous report on the Weed and Seed program, we recommended that EOWS improve its management of the Weed and Seed program. Specifically, we recommended that EOWS (1) develop adequate internal controls to ensure that the basis and the rationale for new and existing site qualification and funding decisions are always fully documented, (2) improve program monitoring to ensure that sites meet the grant requirement of submitting progress reports and that EOWS site visits are documented, (3) develop criteria for determining when sites are self-

[1]U.S. General Accounting Office, *Federal Grants: More Can Be Done to Improve Weed and Seed Program Management*, GAO/GGD-99-110 (Washington, D.C.: July 1999).

sustaining and when to reduce or withdraw program funding, and (4) develop additional performance measures that track program outcomes. This report summarizes our assessment of EOWS's efforts to address our recommendations.

To obtain information on EOWS's efforts, we reviewed relevant documents, including EOWS's policies and procedures, monitoring documentation, and agency staffing and budget data. We reviewed GAO, Congressional Research Service, and Justice's Office of Inspector General reports. In addition, we interviewed officials from EOWS, the Office of Justice Programs, other entities in the Justice Department, and researchers in performance measurement and evaluation at the Justice Research and Statistics Association and the Urban Institute in Washington, D.C. We visited and interviewed program staff at three Weed and Seed sites. We reviewed 30 randomly selected Weed and Seed grant files to identify the actions taken by EOWS for those grants to document its qualification and funding decisions and the steps EOWS took to ensure that grant documentation requirements were met. Since the files we reviewed were not representative of all EOWS grant files, we cannot project the results to the larger population. However, the information helps to identify the level of implementation of our recommendations for those grants. Additional information about the report's scope and methodology is presented in appendix I. We conducted this engagement in accordance with generally accepted government auditing standards.

Results in Brief

Despite some progress toward addressing our recommendations aimed at improving program management, our review shows that EOWS has not fully implemented any of the management improvement recommendations we made in 1999. First, EOWS has revised its internal controls to require that significant qualification and funding decisions be documented and readily available in two types of centralized files: official recognition and official grant files. However, EOWS has not always ensured that the documentation was readily available and that its policies and procedures for internal controls were followed for the official recognition and official grant files we reviewed. Second, EOWS reported to us that it had taken a number of actions intended to improve program monitoring, such as mandating the timely submission of progress reports and adequate recording of site visits, as we recommended. Nonetheless, we found that while EOWS was able to provide such documentation before our review ended, documentation was not available in some of the central grant files we reviewed. Thus, the documentation was not readily available for EOWS management or external reviewers, as required by the Office of Justice Programs (OJP) policies and GAO's internal control standards. Third, we

found that EOWS still lacks fully developed criteria we recommended that they develop to determine when sites have become self-sustaining and when to reduce or withdraw Weed and Seed funds because of the level of sustainability, even though sustainability is a central goal of the program. At the time of our review, no site's funding had been reduced or withdrawn because of sustainability during the 13 years of the program's existence. Fourth, EOWS began developing additional performance measures to better assess how well sites are meeting program objectives, as we recommended in 1999. However, our work showed that although EOWS collected data on a variety of activities taking place at Weed and Seed sites, they generally did not measure the extent to which grantees were weeding crime from neighborhoods and preventing it from recurring. While EOWS has initiated studies on how to develop additional performance measures, at the time of our review, none of these studies had been completed.

To further improve program management, we make a recommendation to the Attorney General for four actions to help ensure full implementation of the recommendations we made in our 1999 report. In commenting on a draft of this report, Justice partially agreed with our recommendations and mentioned actions being taken or planned in response.

Background

The Weed and Seed program is a Justice discretionary grant program within OJP.[2] The Assistant Attorney General for OJP is responsible for the overall management and oversight of offices within OJP, including EOWS. The Assistant Attorney General for OJP sets policies, promotes coordination among OJP bureaus and offices, and ensures that EOWS follows its policies and procedures. EOWS provides funding to grantees to help prevent and control crime and improve the quality of life in targeted high-crime neighborhoods across the country.[3] It is a joint federal, state, and local program for coordinated law enforcement and neighborhood reinvestment. Federal program funding is to support Weed and Seed sites and to provide training and technical assistance.[4]

[2]Discretionary grants are awarded to eligible grantees, most often on a competitive basis.

[3]A grantee is an entity that receives funding from EOWS to implement the Weed and Seed program. The grantee distributes the funds to sites and is responsible for ensuring that sites comply with the terms of the grant. A grantee may have more than one site.

[4]A site is a geographically defined area ranging in size from several neighborhood blocks to several square miles. With the input of the local U.S. Attorney's Office and the site's steering committee, each site develops and implements its own Weed and Seed program.

The Weed and Seed program has grown since it began in fiscal year 1991 with three pilot sites in Kansas City, Missouri; Omaha, Nebraska; and Trenton, New Jersey, and a relatively small investment of federal money. From fiscal year 1999 through 2003, the number of Weed and Seed sites increased from 163 to 221, while the total annual program budget generally increased from about $45 million to $70 million. See table 1 for fiscal years 1999-2003 data on the Weed and Seed program, including EOWS's funding history. In fiscal year 2003, with a budget of about $70 million, EOWS awarded grants to 221 Weed and Seed sites.

Table 1: EOWS Funding History for Fiscal Years 1999-2003

Fiscal year	Unobligated balance carried forward from prior year	Prior year recoveries and other reimbursable adjustments	EOWS appropriation	Funds from the asset forfeiture fund[a]	Funds from the Housing and Urban Development (HUD)[b]	Total funding available	Number of funded sites
1999	$4,122,668	$714,466	$33,500,000	$6,500,000	$0	$44,837,134	163
2000	$4,129,852	$2,066,682	$33,500,000	$6,500,000	$0	$46,196,533[c]	177
2001	$4,955,423	$1,269,708	$33,925,200	$15,500,000	$0	$55,650,331	212
2002	$584,278	$2,359,292	$58,918,000	$0	$10,000,000	$71,861,570	218
2003	$4,102,334	$2,713,913	$58,542,000	$0	$4,935,000	$70,293,247	221

Source: OJP's Office of Budget and Management Services data. GAO did not verify the data.

Note: For EOWS funding history prior to 1999, see GAO/GGD-99-110.

[a]The proceeds from the asset forfeitures fund were used for federal and state law enforcement purposes. EOWS received these funds from Justice, under a reimbursable agreement, for the payment of various costs incurred by state and local law enforcement officers that participated in joint federal law enforcement operations with federal agencies.

[b]HUD made $10 million in additional funding available, under a reimbursable agreement, to help Weed and Seed sites reduce drug-related crimes in public housing.

[c]Does not add because of rounding.

EOWS is responsible for the national management and administration of the Weed and Seed program, including developing policy and providing guidance and oversight. EOWS currently administers the Weed and Seed program with a staff of 2 management officials, 10 grant monitors, 3 support staff, 3 detailees,[5] and 6 contractors.

[5]Two detailees are from the Federal Bureau of Investigation (FBI) and one is from the Department of the Interior. The FBI detailees work part-time at EOWS.

Before a community can apply for Weed and Seed grant funding and become an eligible site, it must first apply for and gain official recognition from EOWS. In order to obtain official recognition, a potential Weed and Seed site must show in its application that it has a strategy for weeding and preventing crime. Once the application has been received, EOWS creates and maintains the official recognition files that are intended to include documentation such as the rationale for decisions to grant or deny official recognition to an applicant. Official recognition requires the U.S. Attorney in the area where the Weed and Seed site is to be located to organize a local steering committee made up of various federal, state, and local representatives, including residents, to be responsible for local administration of the program.[6] For official recognition, a site is also required to develop a management plan, engage residents and other partners in its activities, and develop a comprehensive program to weed out crime and gang activity and seed the area with social services, economic services, and economic revitalization.

Weed and Seed program guidance requires that its sites show plans for addressing four required elements: (1) law enforcement; (2) community policing; (3) crime prevention and intervention, and substance abuse prevention, intervention, and treatment; and (4) neighborhood restoration. According to EOWS, law enforcement should attempt to eliminate the most violent offenders by coordinating and integrating the efforts of federal, state, and local law enforcement agencies in targeted high-crime neighborhoods. The objective of community policing is to raise the level of citizen and community involvement in crime prevention and intervention activities. Crime and substance abuse prevention, intervention, and treatment should include youth services, school programs, community and social programs, and support groups. Finally, neighborhood restoration should focus on assistance to distressed neighborhoods through economic and housing development. Weed and Seed sites fund a variety of law enforcement and community activities. For example, law enforcement-funded activities range from participation in a multijurisdictional task force to conducting bike patrols in the community. See appendix II for additional information on Weed and Seed activities at the sites GAO visited.

[6]There are 93 U.S. Attorneys throughout the United States, Puerto Rico, the Virgin Islands, Guam, and the Northern Mariana Islands. Each U.S. Attorney is the chief federal law enforcement officer of the United States within his or her particular jurisdiction. The U.S. Attorneys serve as the nation's principal litigators under the direction of the Attorney General.

Applicants that are officially recognized are eligible to apply for funding for up to 5 years. OJP's Office of the Comptroller creates and maintains official grant files for sites that are awarded funding by EOWS. Applicants are rated based on the strategy they developed in response to the four required elements, as stated above.

In our 1999 report, we made four recommendations to help EOWS improve program monitoring and management. The first was to develop adequate internal controls to fully document significant qualification and funding decisions. We found that EOWS lacked internal controls requiring significant program management decisions be documented. Therefore, EOWS was not able to ensure that it was making the best decisions about allocating available funds. Our second recommendation was to improve program monitoring to ensure that sites met the grant requirement of submitting progress reports and that EOWS site visits were documented. We found that EOWS did not always ensure that local sites submitted progress reports and that grant monitors documented the results of site visits. Such documentation would help EOWS management and grant monitors determine how sites are meeting program objectives and how well sites are complying with grant requirements, and assist them in making future grant qualification decisions. Our third recommendation was to develop criteria for determining when sites have become self-sustaining and when to reduce or withdraw program funding. We found that although self-sustainability is central to the program, no site's funding had been reduced or withdrawn as a result of its efforts to become self-sustaining in the 9 years of the program's existence. Establishing such criteria is important because the Weed Seed program was founded on the premise that federal funding would continue for a finite period, after which a Weed and Seed site would be self-sustaining. Our fourth recommendation was to develop additional performance measures to track program outcomes. We found that EOWS's performance indicators generally tracked activities rather than program results; therefore, EOWS was not able to measure the success of the program.

EOWS generally agreed with three of the four recommendations presented in the report and discussed future actions it planned to take. EOWS officials disagreed with our recommendation on self-sustainability. They stated that developing criteria to ascertain self-sustainment is redundant since EOWS adopted a 5-year rule under which it could discontinue awarding funding to qualifying sites unless the sites expanded to an additional neighborhood site.

Internal Controls Have Been Developed, but Challenges Remain

Although EOWS has developed internal controls intended to require that significant qualification and funding decisions be documented and readily available for review as we recommended in 1999, these policies and procedures are generally not being followed in the files we reviewed. In response to our 1999 recommendation on internal controls, EOWS established policies and procedures intended to ensure that significant qualification decisions were documented. In addition, OJP requires that qualification and funding decisions are to be documented in official recognition and official grant files. Our review of 20 official recognition and 10 official grant files showed that some of EOWS's official recognition and official grant files were missing full documentation regarding the qualification and funding decisions.[7] However, before our file review ended, EOWS officials produced further documentation, which they acknowledged was not in the official recognition and official grant files as required, but rather in the personal working files of grant monitors and thus not readily available to EOWS management and external reviewers. This lack of ready availability is not in keeping with EOWS's and OJP's policies and procedures, or with the Comptroller General's standards for internal controls.[8] Without having official recognition and official grant files complete and readily available, it may delay and complicate EOWS officials' oversight of the documentation of qualification and funding decisions.

Policies and Procedures Have Been Developed to Document Significant Decisions

Both EOWS and OJP policies and procedures have been developed to help ensure the documentation of significant decisions. In 2000, EOWS developed a policies and procedures guide in response to the recommendation we made in our 1999 report intended to ensure that significant qualification and funding decisions for new and existing sites[9] were always fully documented, and further revised the guide in 2003. This guide requires that all documentation pertaining to official recognition decisions be kept in the official recognition files. EOWS is also required to follow the policies in the *OJP Grants Management Policies and Procedures Manual*, which requires that EOWS fully document program management decisions in both official recognition files and official grant

[7]When applicants apply for funding, EOWS creates and maintains official recognition files. If applicants receive funding, OJP creates and maintains official grant files.

[8]U.S. General Accounting Office, *Standards for Internal Control in the Federal Government*, GAO/AIMD-00-21.3.1 (Washington, D.C.: November 1999).

[9]Throughout the rest of this report, we refer to both new and existing sites as sites.

files. The OJP manual specifically requires that the official recognition files and official grant files contain key documents such as ratings information, rejection letters, and applications.

Official Recognition and Official Grant Files Were Incomplete

Despite EOWS's and OJP's efforts to require the documentation of qualification and funding decisions in official recognition and official grant files, some of EOWS's official recognition and official grant files we reviewed were incomplete at the time of our file review. In reviewing the official recognition files, we randomly selected 10 files to review from the 94 files submitted for official recognition in fiscal year 2002. Additional information about how we selected the files is in appendix I. We found sufficient documentation in 7 of the 10 files to determine the basis and rationale for decisions to award official recognition. However, in the remaining 3 files we were unable to determine the basis and rationale for such decisions because documentation was insufficient. For example, key documents such as the ratings information that EOWS grant monitors use to record their assessment of the official recognition applications did not contain the basis and rationale for the award decision.[10] Additionally, OJP's grant policies and procedures require EOWS's grant monitors to prepare a rejection letter, informing applicants of reasons for rejection when funding is denied and place a copy of the rejection letter in the official recognition file. We reviewed all 10 official recognition files for the applicants that were eligible to apply for funding in fiscal year 2002 but were rejected. We found a rejection letter was missing in 7 of the 10 files.

We also reviewed documents in EOWS's official grant files to assess EOWS's efforts to comply with EOWS and OJP policies for fully documenting funding decisions. We randomly selected 10 official grant files to review from the 31 sites that were funded in fiscal year 2002. We found that none of the 10 official grant files fully documented funding decisions for Weed and Seed sites. For example, the application, a basic component of the official grant file, was missing in 8 of the 10 files.

Challenges Persist in Making Documentation Readily Available

Several directives require that grant documentation be readily available. OJP's policies and procedures manual requires that documentation be kept readily available in the official recognition and official grant files, so that OJP and EOWS management can identify and resolve any problems or

[10]EOWS uses the information in the documents as the basis to award official recognition.

deficiencies in grantees' compliance with relevant policies and procedures. OJP's policies and procedures manual requires that all pertinent information that should be in the official recognition and the official grant files be kept in a centralized location to facilitate reviewing for completeness. In addition, the Comptroller General's guidance on internal controls in the federal government, *Standards for Internal Control in the Federal Government*, requires that the documentation for all transactions and significant events be readily available for examination. The Assistant Attorney General for OJP is responsible for holding EOWS accountable for following its policies and procedures. In reference to the ratings information and rejection letters missing from the official recognition files, EOWS produced the documents after our initial review, informing us that the documents were kept in the personal files of the grant monitors--rather than the official recognition files--a practice not in keeping with EOWS's and OJP's policies and procedures. In reference to the missing applications, EOWS officials also produced them after our initial review, but did not specify where they found them. Not having complete and readily available official recognition and official grant files may delay and make it more difficult for OJP and EOWS officials to perform management functions such as overseeing and assessing the documentation and oversight of qualification and funding decisions. While we eventually were able to obtain documentation showing the basis and rationale for EOWS decision making, the incomplete official recognition and official grant files made the review difficult and time-consuming.

In responding to a draft of this report, Justice stated that electronic documents maintained in its grant management system (GMS) are considered a part of the official recognition and official grant files and are readily available to EOWS, and that they should have been readily available to, and easily accessible by, GAO.

EOWS Has Taken Steps to Improve Program-Monitoring Documentation, but Challenges Remain

In response to our 1999 recommendation, EOWS has taken steps to improve program monitoring, as with the documentation of qualification and funding decisions, but challenges remain in making the monitoring documentation readily available. While OJP requires progress reports and site visit reports to be included in the official grant files, our review in 2003 of 10 official grant files showed that some of EOWS's files were missing full documentation. However, before our review ended, EOWS provided further documentation that fully documented progress reports and site visits, which it acknowledges was not in the official grant files, and thus not readily available. This lack of readily available documentation is not in keeping with OJP's policies and procedures. Not having complete and readily available official grant files may delay and complicate EOWS

officials' and external reviewers' assessment of whether EOWS's monitoring requirements are being followed.

Official Grant Files Were Incomplete

Despite EOWS's efforts, some of the official grant files we reviewed were incomplete at the time of our file review. We randomly selected 10 files from the 31 sites that were first funded in fiscal year 2002[11] to determine whether the sites had submitted the required progress reports from January 1, 2003, through June 30, 2003.[12] Of the 10 files we reviewed, 6 did not contain any of the required progress reports for the period. The remaining 4 files included the required progress reports. OJP's policies and procedures require EOWS to ensure that progress reports are included in the official grant files. However, when we asked EOWS about the missing progress reports, EOWS provided us with the requested documents. We asked, but EOWS did not specify where it found the missing documentation.

In addition, EOWS's grant monitors are required to conduct site visits a minimum of every 18 months and document their visits. This documentation is meant to convey to EOWS management officials how well sites are complying with grant requirements and is to be used by EOWS in making funding decisions. Grant monitors are to prepare a report of the visits and forward a copy to the Office of the Comptroller for inclusion in the official grant file. We reviewed the same 10 grant files discussed above to determine whether site visits were fully documented. We found that a site visit report was not yet due for 7 of the 10 files. In the remaining 3 files where a site visit was due, none of the 3 files contained documentation that the site visit had been conducted. We requested to speak to the responsible grant monitors to determine whether site visits had been conducted. EOWS officials told us that the monitors were no longer involved with the program but provided additional documentation for the 3 files we reviewed. The documentation showed that of the 3 sites, only 1 visit had been conducted; the other 2 were scheduled but had been delayed. While we only reviewed 3 files where a site visit was due, the lack

[11]The remaining 187 of the 218 sites received funding in fiscal year 2002, but were initially funded prior to fiscal year 2002.

[12]Progress reports describe Weed and Seed activities and the accomplishment of objectives in a site's funding application. Progress reports help EOWS officials determine how sites are meeting program objectives and assist them in making future grant decisions. Progress reports are due 30 days after June 30 and December 31, respectively.

of documentation in all 3 files, as well as the fact that only 1 of 3 site visits had been conducted, added to our concerns about the completeness of official grant files for program oversight.

Challenges Persist in Making Monitoring Documentation Readily Available

As we have previously mentioned, OJP's policies and procedures manual and the Comptroller General's guidance on internal controls require that documentation should be kept readily available for examination. Subsequent to our finding missing progress reports and site visit reports, EOWS provided us with additional documentation that demonstrated that the progress reports and one of the site visit reports had been completed. When asked about where they found the missing progress reports and site visit reports, EOWS officials did not specify where they found the missing documentation.

Despite Some Steps, Challenges Remain in Developing Criteria for Self-Sustainability

EOWS has established a rule and set some activities for sites to complete to encourage them to become self-sustaining. However, it has still not fully developed criteria to determine when sites have become self-sustaining and when to reduce or withdraw Weed and Seed grant funds, as we recommended in 1999. To become self-sustaining, sites must leverage additional resources from sources other than EOWS to sustain the Weed and Seed program without EOWS funds. We found that EOWS has not reduced or withdrawn funds from any Weed and Seed sites for reasons related to becoming self-sustaining. This is important because without overall program funding increases, new sites cannot be funded unless funding can be reduced or discontinued from sites that have achieved self-sustainability.

EOWS Encourages Self-Sustainability, yet Needs Criteria to Make Funding Decisions

In 1999, EOWS established a rule to encourage self-sustainability that was generally intended to limit Weed and Seed funding to a site to 5 calendar years and require grantees to shift the majority of EOWS funds to a different site after 5 years.[13] According to EOWS officials, EOWS also encouraged sites to become self-sustaining by establishing activities to be completed during each year of the 5-year grant.[14] Program monitors are to assess sites' completion of these activities by recording results on a checklist.

[13]Grantees may have more than one site.

[14]EOWS refers to these activities as benchmarks. For a list of EOWS's benchmarks, see appendix IV.

We found that while EOWS undertook efforts to encourage self-sustainability, it has not fully developed criteria to make funding decisions based on whether sites had achieved self-sustainability. In fiscal year 2002, 73 sites, which had completed 5 years of EOWS funding, reapplied for funding. EOWS approved an additional round of 5-year funding to 67 of these sites. EOWS denied funding to 6 sites, but not for reasons related to self-sustainability. At the time of our review, no site's funding had been reduced or withdrawn because the site had achieved self-sustainability, even though EOWS has funded some sites since the early 1990s. In relation to the activities EOWS set to encourage sites to achieve self-sustainability, because these activities were established in 2003, we could not assess the sites' progress toward completing them. As we reported in 1999, without criteria, EOWS does not have a basis for determining when sites are self-sustaining and when to reduce or withdraw Weed and Seed funds.

EOWS officials told us that OJP is currently developing criteria for self-sustainability for EOWS and other OJP programs and that a report detailing the criteria may be completed in 2004. According to Justice, EOWS developed a new criterion for self-sustainability in the FY2003 Competitive Application Kit regarding whether or not a full-time coordinator is funded by a reallocation of resources other than the Weed and Seed grant.

For information about proposed legislation that could affect self-sustainability for Weed and Seed sites, similar to other Justice programs, see appendix III.

Performance Measures Generally Did Not Track Program Outcomes

In 1999, we reported[15] that while EOWS had developed various performance measures in an attempt to respond to the Government Performance and Results Act (GPRA) of 1993,[16] EOWS's measures generally did not track program outcomes.[17] GPRA seeks to shift the focus of federal management and decision making away from activities performed to outcomes, or the results of activities undertaken. Since our

[15]See GAO/GGD-99-110.

[16]P.L. 103-62.

[17]Performance measures translate program goals into concrete, observable conditions that determine what data to collect to learn whether progress has been made toward achieving program goals. Such measures are meant to cover the key aspects of performance that will enable programs to assess accomplishments, make decisions, realign processes, and assign accountability.

last report, EOWS has continued to refine and develop its performance measures, but we found that EOWS still generally collects site activity data rather than measuring outcomes. EOWS also generally does not use intermediate measures, which represent conditions believed to precede or contribute to achieving the ultimate outcomes that may be considered constructive steps toward measuring outcomes. While assessing success using outcomes and/or intermediate measures can be difficult, doing so is important to program management and to policy makers for understanding whether the program is achieving the intended results, and for identifying opportunities for improvement.

EOWS Generally Collects Activity Data Rather Than Outcome Performance Measures

Our review showed that EOWS generally collects activity data, but has not developed outcome or intermediate measures that enable EOWS management to track the success of the Weed and Seed program in meeting its goals.[18] As established in prior work by GAO, outcome measures help officials track the success of their programs in meeting program goals.[19] EOWS mostly collects data about site activities, such as whether sites have foot patrols, safe havens, and provide job training. An intermediate measure, for example in relation to job training programs, might be the extent to which those who attend job training obtain employment. This intermediate measure rests on the assumption that individuals who are employed are less likely to commit crimes. See appendix V for activity data collected by EOWS.

EOWS officials told us that to measure its success in reducing violent crime, they collect data on the number of homicides and consider homicides the significant indicator for measuring performance outcomes. However, using the number of homicides as an outcome measure indicative of program success is problematic for several reasons. First, because homicides are relatively rare, even in high crime areas, homicide trends may be too unstable (fluctuate too much from year to year) to assess the success of the Weed and Seed program. Second, outcome measures, such as homicides, can present some methodological challenges

[18]EOWS officials told us that the Weed and Seed program has three main goals: (1) reduce violent crime, (2) reduce drug crime, and (3) coordinate Weed and Seed funds with other resources. Such goals are related to the overall intent of the program to weed out crime from targeted neighborhoods and seed them with a variety of programs to prevent crime from recurring.

[19]U.S. General Accounting Office, *Managing for Results: Analytic Challenges in Measuring Performance*, GAO/HEHS/GGD-97-138 (Washington, D.C.: May 30, 1997).

because it is difficult to draw a direct causal link between the homicides and a program's work. Economic trends and other law enforcement initiatives could also be responsible for the observed outcomes. If homicides are used as a performance measure, any analysis should attempt to control for other factors influencing the outcomes. Third, given the broad nature of this program goal -- to reduce violent crime, measuring outcomes in relation to only one type of violent crime also seems problematic because it is too narrowly focused. According to EOWS officials, homicide data was selected because of its reliability, and because gang-related homicides are a significant indicator of the success of a Weed and Seed strategy.

In February 2004,the Office of Management and Budget (OMB) issued a detailed assessment of the Weed and Seed program.[20] According to OMB, Weed and Seed has not demonstrated results. OMB's report states that Weed and Seed lacks clear targets or timelines for reducing violent crime. Additionally, the report states that Weed and Seed has difficulty collecting data and developing aggregate measures for assessing program performance.

GAO Has Previously Reported on How Other Federal Programs Have Developed Effective Performance Measures, Despite Challenges

Although the Weed and Seed program faces many challenges in developing outcome measures for its various activities, we have previously reported that other federal programs have developed effective performance measures even under difficult circumstances.[21] These reports identified a variety of strategies that other federal programs have used to develop performance measures. For example, we reported that some federal programs utilized a mix of outcome and intermediate measures.[22] This combination of measures allowed them to minimize the risk of not showing outcomes because of their limited control over external factors such as economic trends, which may prevent programs from achieving intended outcomes. Intermediate measures are also helpful to show progress when it is expected to take many years before the desired outcome is likely to be achieved. In such instances, progress toward program outcomes may be demonstrated through intermediate outcomes.

[20]OMB periodically assesses goals and results of federal programs, such as Weed and Seed, and reports on its findings. The purpose is to tie performance with the budget process.

[21]U.S. General Accounting Office, *Managing for Results: Measuring Program Results That Are Under Limited Federal Control*, GAO/GGD-99-16 (Washington, D.C.: December 11, 1998) and GAO/HEHS/GGD-97-138.

[22]See GAO/GGD-99-16.

We also reported that where measuring outcomes is, after careful consideration, deemed infeasible, intermediate measures can be used to track progress toward outcomes for programs such as Weed and Seed.[23]

In addition, we have reported other ways federal agencies have used intermediate outcomes.[24] For example, the National Highway Traffic Safety Administration uses the rate of safety belt use as an intermediate measure of its goal to reduce motor vehicle crashes and the resulting fatalities and injuries. As we reported, an increase in the use of safety belts is considered an intermediate outcome--not an end outcome--because it is desirable not in itself but because it has been demonstrated to contribute to the ultimate goal--reducing highway-related fatalities and injuries.[25]

Additional Performance Measures Are Being Developed for EOWS

The Justice Research and Statistics Association and the Urban Institute are currently developing additional outcome performance measures under contracts awarded by EOWS in 2002 and 2003. According to EOWS officials, these research organizations have the expertise needed to develop outcome performance measures for the Weed and Seed program. We interviewed researchers from these organizations and spoke to EOWS officials about their research plans. However, none of the studies on developing additional performance measures had been completed at the time of our review, and it is too soon to tell whether the studies will produce outcome measures needed to adequately assess the Weed and Seed program.[26] The Justice Research Statistics Association and other researchers were conducting studies on crime data and evaluation during our review; one of those studies was submitted to EOWS in November 2003. See appendix VI for a description of EOWS's ongoing and completed studies.

[23]U.S General Accounting Office, *Law Enforcement: Better Performance Measures Needed to Assess Results of Justice's Office of Science and Technology*, GAO-04-198 (Washington, D.C.: November 2003).

[24]See GAO/GGD-99-16.

[25] It is commonly accepted that safety belt use reduces fatality rates and the severity of injuries. See U.S. General Accounting Office, *Highway Safety: Safety Belts Use Laws Save Lives and Reduce Costs to Society*, GAO/RCED-92-106 (Washington, D.C.: May 1992)

[26]In November 2003 the Justice Research and Statistics Association completed a study comparing homicide trends in sites to their host jurisdictions. However, this study relied on homicide rates collected by EOWS, rather than developing additional performance measures.

Conclusions

We believe that 5 years has been ample time for OJP and EOWS to fully implement the recommendations we made in our 1999 report. EOWS has developed and partially implemented policies requiring the completion of documentation to support major decisions, such as qualification and funding decisions, and recorded monitoring information. But by failing to ensure that these documents are appropriately maintained in official recognition and grant files, the documents are not readily available to meet their purpose. That is, the intent of this type of internal control is to ensure that both management and external reviewers such as auditors can adequately perform their responsibilities, for example, reviewing work and making management decisions based on complete and accurate information. While EOWS was eventually able to produce the documentation we requested, failure to appropriately file the documentation made the process of using it very inefficient and, in effect, may have defeated the purpose of having it completed.

While EOWS may have moved forward in addressing its self-sustainability goals by recently developing an activity checklist for grantees to use to document actions that are intended to achieve self-sustainability, the activities do not constitute criteria for determining when sites should be considered self-sustaining and consequently have federal funds reduced or discontinued. One of the benefits of such criteria is to enable EOWS to determine when current projects are likely to be able to self-sustain so that available funding can be used to help reduce crime and achieve other benefits in other deserving communities. Because no sites have had their funding withdrawn because they were deemed self-sustaining during the 13-year life of this program, EOWS may be foregoing the opportunity to use the funds in another location where the need for federal funding is greater or EOWS may need less overall funding. Without criteria to determine when federal funds are no longer needed, EOWS also runs the risk of providing funds beyond what is needed to sustain some sites.

EOWS also needs performance measures that focus on program outcomes, and/or achievement of intermediate goals, so that it and those that provide oversight, such as the Congress and OMB, will be able to adequately assess the extent to which the program is achieving its goals. Management depends on this type of assessment to make the strategic and operations decisions needed to achieve the program's missions and goals. Congress and oversight agencies need this type of assessment so they can make funding decisions and help ensure that EOWS is in the best position and has the best tools to accomplish its mission. While EOWS recognizes the need for outcome performance measures and has funded studies to help

develop them, it is unclear at this time whether these studies will be able to suggest the needed measures.

Recommendations for Executive Action

We recommend that the Attorney General of the United States require the Assistant Attorney General for OJP to ensure that the Executive Office for Weed and Seed fully implement the intent of our previous recommendations by taking the following four steps:

- maintain the documentation of the basis and rationale for qualification and funding decisions in appropriate grant files;
- retain progress reports and site visit reports in official grant files;
- clearly define criteria to assess when sites are self-sustaining and apply the criteria to sites when making further funding decisions; and
- develop outcome performance measures--or, where measuring outcome is, after careful consideration, deemed infeasible, intermediate measures--that can be used to adequately track progress toward program outcomes of the Weed and Seed program.

Agency Comments and Our Evaluation

We provided a draft of this report to the Attorney General of the United States for review and comment. In a March 11, 2004, letter, the Assistant Attorney General (AAG) for OJP commented on the draft. Her written comments are summarized below and presented in their entirety in appendix VII. Based on Justice's comments, we modified the text of our report where appropriate and also incorporated Justice's technical comments into this report where appropriate.

In the AAG's response, the Justice Department generally agreed with our recommendations on maintaining the documentation of the basis and rationale for qualification and funding decisions in appropriate grant files and retaining progress reports and site visit reports in official grant files. Justice agreed in part with our recommendation on self-sustainability criteria and fully agreed with our recommendation on outcome performance measures, and offered additional information to show it had moved forward in responding to our past recommendation.

Justice agreed that controls should be strengthened to ensure that the basis and rationale for qualification and funding decisions are documented in the centrally maintained official recognition (OR) files. In Justice's comments, the AAG explained that electronic documents maintained in its grant management system (GMS) are considered a part of the official recognition file and are readily available to EOWS, and that they should have been, but were not, readily available to, and easily accessible by, GAO. As of the current fiscal year, OJP will not only post all solicitations

and receive all grant applications via GMS, but also receive and maintain all grant progress reports on GMS. In this way, there will be no opportunity to misplace official grant documents. Justice stated that OJP's Office of the Comptroller will implement procedures to ensure that external reviewers have ready access to GMS information.

Justice agreed with our second recommendation on retaining progress reports and site visit reports in official grant files. Justice noted that EOWS recently implemented a progress reporting module in GMS that now enables recipients of grants awarded through GMS to submit semi annual progress reports electronically. OJP is developing a monitoring module that will enable program monitors to record and report on site visits directly in GMS. In the interim, EOWS and the Office of the Comptroller will take steps to strengthen controls to ensure that copies of completed site visit reports are included in the official grant file.

Justice agreed in part with our third recommendation on self-sustainability and noted that EOWS will further define the criteria to assess when sites are self-sustaining and apply the criteria when making funding decisions. Further, Justice said it is promoting a "graduation" process to bring sites to sustainability and cease providing Weed and Seed funding to those sites, thus making funding available to assist newer developing sites. However, Justice does not agree that EOWS has never set criteria for self-sustainability. Justice said that EOWS set a criterion for self-sustainability in the FY2003 Weed and Seed Competitive Application Kit, which asked if the application provided for a full-time coordinator funded by reallocation of existing resources other than the Weed and Seed grant. According to Justice, applications were ranked against this criterion. According to EOWS officials, in March 2004, EOWS will announce an additional criterion specific to measuring self-sustainability. The new criterion will require grant applicants to identify other funding sources at a level five times the EOWS contribution. This criterion will be considered when making funding decisions.

We applaud EOWS's commitment to further develop criteria to assess when sites are self-sustaining and apply the criteria to sites when making further funding decisions. However, Justice's comments did not provide specific information about how the Application Kit criterion has been used to determine self-sustainability. We added Justice's belief that this criterion relates to self-sustainability to the text, but also note that over the 13-year history of the program, funding has never been reduced or withdrawn from a site because a site was deemed to be self-sustaining.

Justice agrees that developing outcome performance measures is important and states that EOWS has been working to develop measures that track progress toward program outcomes in the Weed and Seed Program. In a letter commenting on this draft report, Justice provided a summary of results from JRSA's study to support EOWS's use of the change in homicides as a measure of program success. According to Justice's summary, this study concluded that measuring reductions of homicides is an adequate performance measure of the Weed and Seed program because of its reliability and explicit selection as a goal by over 30 percent of the Weed and Seed sites participating in the Crime Pattern Study. In addition, Justice includes a 5 percent reduction in homicides in Weed and Seed sites as part of its Strategic Plan. With its comments, Justice included summaries of two recent research reports. One of these, Analysis of Homicide in Weed and Seed Sites, showed positive results in homicide trends in Weed and Seed sites when compared to host jurisdictions. Another report, Crime Pattern Analysis (Three-Top Crime Study), showed that after the third year of Weed and Seed program implementation, sites encountered a significant decrease in reported crimes.

Because the Crime Pattern Analysis study was not completed at the time of our review, we could not fully assess its methodological rigor and whether it would result in effective outcome performance measures. Although we believe that EOWS may be moving in the right direction regarding developing additional performance measures and we mention the studies in the report text, we also believe that homicides have shortcomings as described in the text when used as the only measure of the program's performance. In addition, our review of the Analysis of Homicide in Local Weed and Seed Sites study generated several concerns. First, the study used changes in the raw volume of homicides, instead of changes in homicide rates, as its indicator of success or failure of program sites. This method does not account for changes in the population as would be accounted for were a homicide rate measured. Second, the study used the larger host jurisdictions for specific Weed and Seed sites as the comparison locations to which the Weed and Seed sites are compared. In doing so, Weed and Seed sites' homicide data are included with host jurisdictions' homicide data, thus making the differences between them extremely difficult to interpret. It is also worth noting that this study evaluates Weed and Seed sites only on the basis of decreases in homicides, while Weed and Seed was intended to decrease crime more generally.

We are sending copies of this report to the Attorney General, appropriate congressional committees, and other interested parties. We will also make copies available to others upon request. In addition, the report will be

available at no charge on GAO's Web site at http://www.gao.gov. If you or your staff has any questions on this report, please call Weldon McPhail on (202) 512-8644 or me on (202) 512-8777.

Sincerely yours,

Laurie E. Ekstrand, Director
Homeland Security and Justice Issues

Appendix I: Scope and Methodology

To determine what actions the Executive Office for Weed and Seed (EOWS) has taken to develop an adequate internal control to ensure full documentation of the basis and rationale for qualifying new and existing sites for funding, we reviewed (1) the criteria used to determine which new and existing sites should be qualified for funding, and (2) EOWS's policies and guidance. To gather this information, we interviewed officials from Justice and EOWS and reviewed pertinent documents, including EOWS policies and procedures, official recognition and grant applications, management oversight and monitoring documentation, and budget reports. In addition, we randomly selected 10 of 94 fiscal year 2002 official recognition files submitted to EOWS for review. These 10 files included 5 files from new applicants and 5 files from existing sites that applied in 2002 and were funded in fiscal year 2002. We reviewed 10 of the 14 official recognition files that EOWS decided not to fund in fiscal year 2002. We also reviewed 10 randomly selected official grant files from the 31 new and existing sites that were approved for funding in fiscal year 2002. Because of limited resources, we did not attempt to review all the files. While the small sample size prevents us from making reliable generalizations, the 30 files we reviewed represented various types of files that EOWS maintains. We selected the files from a list that was provided to us by EOWS. To ensure the list of files was sufficient for the purpose of our review, we spoke to knowledgeable EOWS officials about the completeness and accuracy of the list.

To assess what steps EOWS has taken to improve program monitoring to ensure that sites meet the grant requirement of submitting progress reports, and that EOWS site visits are documented, we reviewed EOWS program grant guidance, including training offered, the EOWS monitoring guidance used by grant monitors when conducting site visits, and the grant files for the Weed and Seed sites that we visited: Pittsburgh, Pennsylvania; Charleston, South Carolina; and North Charleston, South Carolina. We selected these sites from the 221 sites funded by EOWS in fiscal year 2003. Based on our discussions with EOWS officials about the sites, we selected three sites, which although not representative of all sites, had received Weed and Seed grant funds since the early 1990s, which enabled us to learn about their efforts to implement the Weed and Seed strategy over time. We also reviewed selected monitoring visit reports prepared by grant monitors for these sites and biannual progress reports submitted in fiscal years 2002 and 2003. We interviewed EOWS officials and grant coordinators at these 3 sites regarding procedures used for monitoring Weed and Seed sites. We also reviewed the same 10 randomly selected official grant files discussed above from the 31 new and existing sites that were funded in fiscal year 2002 to determine whether the progress reports

and site visit reports were in the official grant files and readily available. The sites were funded under EOWS's competitive application and did not include sites funded under EOWS's continuation application.[1] While the 10 files we reviewed represented various types of files that EOWS maintains, the small sample size prevents us from making reliable generalizations about all official grant files. To ensure the list of files was sufficient for the purpose of our review, we spoke to a knowledgeable official about the completeness and accuracy of the list.

To assess what criteria, if any, EOWS has developed when sites are self-sustaining and when to reduce or withdraw program funding, we asked EOWS officials for any relevant information. Following repeated requests, EOWS officials did not provide any documentation on criteria that they had developed. They did, however, provide information on the five-year rule for self-sustainability and the sites' activities, which we reviewed.

To determine what additional performance measures EOWS has developed that track program outcomes, we interviewed officials from EOWS and the sites we visited. We reviewed pertinent documents, including EOWS policies and procedures, grant applications, and data collected pursuant to the Government Performance and Results Act of 1993 (GPRA). In relation to the studies EOWS commissioned to develop program-wide performance measures, we interviewed the authors of the studies under way to discuss their research plans. At the time of our review, none of the studies on developing additional performance measures had been completed.

[1]Sites funded under EOWS's competitive application can be either the first Weed and Seed site in the jurisdiction that received official recognition or a new geographical area (that is, not contiguous with an existing or former target area) in a jurisdiction with an existing (or continuation) or former Weed and Seed site. Sites funded under EOWS's continuation application are in their second, third, fourth, or fifth year of funding and implementing the Weed and Seed program.

We conducted our audit work between June and December 2003 in accordance with generally accepted government auditing standards.

Appendix II: GAO Site Visit Summary

Table 2: Sites' Weed and Seed Funding History—Fiscal Years 1999-2003

Fiscal year	Pittsburgh, Pa., grant funds	Charleston, S.C., grant funds	North Charleston, S.C., grant funds
1999	$0	$175,000	$0
2000	$475,000	$125,000	$175,000
2001	$675,000	$225,000	$125,000
2002	$825,000[a]	$225,000	$275,000
2003	$435,000[b]	$275,000	$225,000
Total	**$2,410,000**	**$1,025,000**	**$800,000**

Source: GAO site visits and EOWS data.

[a]Pittsburgh's Weed and Seed funds for fiscal year 2002 were amended into the 2001 grant award.

[b]Pittsburgh's Weed and Seed funds for fiscal year 2003 were amended into the 2001 grant award.

Pittsburgh, Pa.

Background

Pittsburgh established its first Weed and Seed site, the Hill District, in 1992. In 1995, Hazelwood became the second Pittsburgh site. In 1997 and 1999, East Liberty and Homewood became the third and fourth Weed and Seed sites in Pittsburgh. Pittsburgh currently receives funds for three sites: East Liberty, Hazelwood, and Homewood. The sites are located between the Allegheny and Monongahela rivers on the eastern side of the city. The population of the target area is 10,897 in East Liberty, 15,849 in Hazelwood, and 9,283 in Homewood. In fiscal year 2003, the Pittsburgh sites in total received $435,000 in Weed and Seed funding. See table 2 for the Weed and Seed funding history for Pittsburgh's three sites.

Activities

Pittsburgh's weeding activities include funding a drug violence initiative headed by the Federal Bureau of Investigation (FBI) and a community-based crime prevention activity coordinated with the police. Pittsburgh's seeding activities include funding a drug education youth camp that provides children with leadership training and fitness tests, and a downtown revitalization program. See table 3 for examples of the types of activities funded by the Pittsburgh Weed and Seed program.

Leveraging Efforts

An important goal of the Weed and Seed program is for sites to leverage resources from sources other than EOWS in order to become self-sustaining. During our site visit and through documentation obtained from Pittsburgh Weed and Seed program staff, we identified several partnerships established by the Pittsburgh Weed and Seed program to leverage resources. These cooperative arrangements involved partners such as the University of Pittsburgh Medical Center and the Pittsburgh Harlequin Rugby Association. Table 4 provides specific examples of leveraging efforts that we identified.[1] Pittsburgh Weed and Seed program staff estimate that they coordinated and leveraged approximately $1.1 million in 2002.

Charleston, S.C.

Background

Charleston became a Weed and Seed site in the spring of 1992. The Charleston Weed and Seed target area includes approximately 8 square miles on the Charleston Peninsula and in the city of Charleston. The entire Weed and Seed site is located in Charleston's Renewal Community. The population of the target area, encompassing 13 neighborhoods, is roughly 17,000. In fiscal year 2003, the site received $275,000 in Weed and Seed funding. See table 2 for Charleston's Weed and Seed funding history.

Activities

Charleston's weeding activities include supporting a youth court with a Weed and Seed juvenile investigator and funding community policing foot patrols. Charleston's seeding activities include supporting a police-youth after-school boxing program, and boarding up abandoned and vacant buildings to improve the appearance of the area. See table 3 for examples of the types of activities funded by the Charleston Weed and Seed program.

Leveraging Efforts

An important goal of the Weed and Seed program is for sites to leverage resources from sources other than EOWS in order to become self-sustaining. During our site visit and through documentation obtained from Charleston, we identified several partnerships established by the

[1]GAO did not verify the funds leveraged by Weed and Seed sites.

Charleston Weed and Seed program to leverage additional resources. These cooperative arrangements involved partners such as the FBI and the College of Charleston's School of Education. Table 4 provides specific examples of leveraging efforts that we identified.[2] Charleston Weed and Seed program staff estimate that they were able to coordinate and leverage approximately $1 million in 2002.

North Charleston, S.C.

Background

North Charleston was originally funded as a Weed and Seed site in August 1993. The city of North Charleston is located about 7 miles north of the city of Charleston. Today, North Charleston has four target neighborhoods: Union Heights, Chicora/Cherokee, Accabee, and Liberty Hill. The population of the target area is 13,606. In fiscal year 2003, the site received $225,000 in Weed and Seed funding. See table 2 for North Charleston's Weed and Seed funding history.

Activities

North Charleston's weeding activities include participating in Operation Cease Fire with the U.S. Attorney's Office, to reduce gun crime in target neighborhoods, and partnering with local law enforcement to improve the bike patrol program. North Charleston's seeding activities include developing the Drug Education for Youth program and supporting an annual neighborhood cleanup. See table 3 for examples of the types of activities funded by the North Charleston Weed and Seed program.

Leveraging Efforts

An important goal of the Weed and Seed program is for sites to leverage resources from sources other than EOWS in order to become self-sustaining. During our site visit and through documentation obtained from North Charleston, we identified several partnerships established by the North Charleston Weed and Seed program to leverage resources. These cooperative arrangements involved partners such as the United States Air Force and the Medical University of South Carolina. Table 4 provides specific examples of leveraging efforts that we identified.[3] North Charleston Weed and Seed program staff estimate that they coordinated and leveraged approximately $3.3 million in 2002.

[2]GAO did not verify the funds leveraged by Weed and Seed sites.

[3]GAO did not verify funds leveraged by Weed and Seed sites.

Table 3: Examples of Activities Funded by Weed and Seed in Pittsburgh, Charleston, and North Charleston

Site	Program component	Activity	Weed and Seed partner	Description
Pittsburgh, Pa.	Law enforcement	Safe Streets program	U.S. Attorney's Office, Federal Bureau of Investigation (FBI)	Drug violence initiative headed by the FBI.
	Community policing	Bike safety classes and registration	Community residents and police officers	Community-based crime prevention activity coordinated with the police.
	Prevention, intervention, and treatment	Drug Education For Youth (DEFY) Camp	Boy Scouts of America, U.S. Air Force	About 60 children participated in leadership training and fitness tests.
	Neighborhood restoration	Improved housing	Hazelwood Initiative, Inc., and the Second Avenue Main Street Program	A community-wide effort to reestablish the local business district, revitalize a 200-acre area, reclaim historic buildings, and build new housing.
Charleston, S.C.	Law enforcement	Youth Court	South Carolina Bar Association, Young Lawyers Division, Charleston Enterprise Community	First-time juvenile offenders are tried by their peers and given an opportunity to improve their behavior.
	Community policing	Foot patrols	Charleston Weed and Seed Patrol Officers, Charleston Police Department	Weed and Seed officers patrol the community on foot.
	Prevention, intervention, and treatment	Police Athletic League Boxing	Police Athletic League	Participants include junior and senior boxers and coaches.
	Neighborhood restoration	Boarding up abandoned and vacant buildings	Charleston Police Department, Maintenance Division	The city boarded up abandoned and vacant buildings in Weed and Seed neighborhoods.
North Charleston, S.C.	Law enforcement	Cease Fire program	U.S. Attorney's Office, North Charleston Police Department	A gun control program that began in January 2003 to reduce gun crime in target areas.
	Community policing	Bike patrol	North Charleston Police Department	Two officers on bike patrol are dedicated exclusively to the Weed and Seed target area.
	Prevention, intervention, and treatment	DEFY program	Charleston Air Force Base	Weed and Seed staff was developing a DEFY program for participants from the Weed and Seed target area.
	Neighborhood restoration	Neighborhood cleanup	Neighborhood residents	An annual neighborhood cleanup was held in April 2003.

Source: GAO site visits and EOWS.

Table 4: Examples of Leveraging Efforts at Weed and Seed Sites in Pittsburgh, Charleston, and North Charleston

Weed and Seed site	Type of partnership or cooperative arrangement	Name of partner or cooperative arrangement	Description
Pittsburgh, Pa.	Federal government	FBI	The FBI leads the Safe Streets program in Pittsburgh to reduce street gang and drug related violence.
	State government	State police	State Police officers are assisting the U.S. Attorney's Office in implementing Justice's Project Safe Neighborhoods (PSN) initiative to reduce gun violence.
	Local government, university	Allegheny County Health Department (ACHD) and University of Pittsburgh Medical Center (UPMC)	In March and April 2000, Pittsburgh began a partnership with ACHD, UPMC, and others to conduct medical and dental screening at community events. The first major effort of the partnership was a lead abatement project, which identified and cleaned contaminated dwellings. The Pittsburgh Urban Redevelopment Authority and the Housing Authority also participated in this effort.
	Local community	Pittsburgh Harlequins Rugby Association	The partnership with the Harlequins began in March 2001. The Harlequins established two teams of 20 children to play touch rugby while also incorporating training in teamwork, partnership, and discipline into the sport.
Charleston, S.C.	Federal government	FBI	The FBI leads the Charleston Safe Streets Task Force to reduce drug-related activities.
	Local government	Charleston Police Department	Police officers train youth in law enforcement procedures and tactics as well as physical training. The goal of this program is to instill responsibility in participants and to prepare them for possible careers in law enforcement.
	Local college	College of Charleston's School of Education	Graduate interns tutor students from Safe Havens.
North Charleston, S.C.	Federal government	U.S. Air Force	The DEFY program will be conducted year-round, through a partnership with the Air Force.
	Local government	North Charleston Police Department	Police officers instruct youth on crime prevention during school breaks at Safe Havens.
	Local university	Medical University of South Carolina Crime Victims Center	Through this partnership, information was distributed to Hispanic families in the Weed and Seed target area about a program designed to provide medical services to Hispanic families.

Source: GAO site visits and EOWS.

Note: Grantees also receive funds from other federal programs and non-federal funds.

Appendix III: Proposed Legislation Could Affect Self-Sustainability

Proposed legislation could affect self-sustainability for Weed and Seed sites by mandating that EOWS impose more rigorous requirements on its grantees, similar to some other Justice programs. Unlike some other Justice discretionary grant programs, the law establishing the Weed and Seed program currently does not have a matching funding requirement,[1] nor does it limit the maximum number of years a grantee can receive funding.[2] H.R. 3036, a bill to reauthorize the Department of Justice for fiscal years 2004 through 2006, was introduced on September 9, 2003. This bill includes a provision that would limit the federal contribution to 75 percent of the total Weed and Seed program costs. The bill would also impose limitations on the duration of grants funded under the Weed and Seed program, limiting to 10 the total number of fiscal years a grantee may receive grants. Additionally, the bill requires that in order for a grantee to be eligible for a grant, it must agree to formulate a timely and effective plan to independently sustain the Weed and Seed program when federal funding ends.

Currently there are other federal grant programs that require a funding match and a limit on the duration of grant awards.[3] For example, the Drug-Free Communities Support Program (DFCSP) and Community Oriented Policing Services (COPS) both have matching requirements and clearly specify the number of years a grantee may be funded. DFCSP is a discretionary grant program with a budget of about $60 million in fiscal year 2003. DFCSP requires a dollar-for-dollar match, limits grantees to no more than 5 years of funding, and reduces awards by 25 percent in the fourth and fifth years. The COPS program, with a budget of about $929 million in fiscal year 2003, generally requires grantees to contribute

[1]A matching requirement requires grant recipients to contribute their own funds to obtain federal grant funds. The Weed and Seed program is authorized and funded by the Department of Justice annual appropriation acts. These acts have not included either a requirement for matching funds or a limitation on the maximum number of years a grantee may receive funding. See for example, Departments of Commerce, Justice, and State, the Judiciary, and Related Agencies Appropriations Act, 1998, P.L. 105-119, 111 Stat. 2440, 2454.

[2]As discussed earlier, beginning in 1999, EOWS imposed a 5-year site expansion rule, under which a site is awarded funding for 5 years and may receive an additional 5 years of funding if the majority of funds are shifted to a new site. This is not a requirement imposed by the law.

[3]U.S. General Accounting Office, *Federal Grants: Design Improvements Could Help Federal Resources Go Further*, GAO/AIMD-97-7 (Washington, D.C.: December 1996).

25 percent of the costs of the program. The federal share of a COPS grant that covers more than 1 year must decline year to year.[4]

[4]Grants for hiring and rehiring may be renewed for up to 5 years. Grants for other purposes may not cover more than 3 years.

Appendix IV: Executive Office for Weed and Seed Selected Activities

Year 1	Year 2	Year 3	Year 4	Year 5
The local U.S. Attorney's Office establishes a steering committee, which establishes clear roles and responsibilities for the site's organizational and management structure.[a]	The steering committee continually educates, guides, and reevaluates site management.			
The steering committee meets monthly and develops a job description for the site coordinator.	Steering committee meets at least monthly.	Steering committee and organizational structure continue to function. Steering committee meets at least quarterly.	→	→
The grantee and the site coordinator establish procedures for tracking grant funds and expenditures.	The grantee and/or local U.S. Attorney's Office evaluates the site coordinator's job performance, with input from the steering committee.[b] The site coordinator and the steering committee work together to ensure timely expenditure of grant funds.	→	→	→
Based on the time line, goals, and objectives established by the site's official recognition,[c] the site begins implementing strategies and developing baseline data, addressing the four required program elements.[d]	The site's strategy to achieve measurable outcomes in the four required program areas (especially law enforcement/community policing) is on track. The site continues to collect data related to goals and objectives.	The site continues to implement strategy for achieving goals and objectives in all four required program elements.	→	The site makes plans to continue community development efforts and strategic planning through various funding sources.
The site begins to publicize the program, to recruit neighborhood leaders, and to mobilize the community.	The site continues program publicity and outreach to recruit neighborhood leaders and mobilize community.	The site continues program publicity and outreach efforts to recruit neighborhood leaders and to mobilize the community while identifying and building sustainable leadership among community members.	The site continues program publicity and outreach efforts to mobilize community and recruit new community leaders.	The site's community leaders are working to sustain efforts and continue community mobilization.

Year 1	Year 2	Year 3	Year 4	Year 5
The site begins coordinating its efforts with related local initiatives, particularly law enforcement resources and activities.	The site continues to coordinate its efforts with local initiatives, particularly programs with local parks and recreation departments.	The Weed and Seed effort begins to be included in city/community plans.	Community leaders have established working relationships with local officials.	The Weed and Seed community is included in city/community planning.
	The steering committee develops and implements the special emphasis program based on community needs.	The special emphasis program is fully operational.		
The site submits timely grant expenditure reports to Executive Office for Weed and Seed and Office of Justice Programs.	→	→	→	→
The site submits timely progress reports, providing program outcome information related to the achievement of the goals and objectives stated in the official recognition and grant applications.	→	→	→	The site submits a final progress report.
	The site communicates regularly with all partners, including U.S. Attorney's Office, Executive Office for Weed and Seed, and community members, using newsletters, faxes, neighborhood visits, e-mail, community meetings, and so forth.	→	→	
The steering committee and the site coordinator evaluate site progress to determine site's technical assistance needs, if any.	→	→	The steering committee and site coordinator review previous years' grant applications to determine plans for final year of official recognition.	The steering committee determines if there is a need to continue the program in other neighborhoods based on the program.

Year 1	Year 2	Year 3	Year 4	Year 5
The site develops operating plans for next year.	→	→	→	→
The site begins developing strategies for long-term self-sustainment.	→	The site establishes a subcommittee to look for additional funding or in-kind resources to sustain the program.	Subcommittee continues to search for additional resources to sustain the program.	→
	The site begins to develop plans for evaluating its programs.	The site identifies an evaluation tool and begins developing an evaluation based on Executive Office for Weed and Seed site evaluation literature.	The site undergoes program evaluation to assess overall effectiveness of official recognition strategy implementation.	By the end of the year, the site releases its full evaluation report, assessing the overall program accomplishments and its effectiveness.

Source: EOWS data.

Note: Arrow indicates action from the previous year continues to the current year.

[a]A site is a geographically defined area ranging in size from several neighborhood blocks to several square miles. With the input of the U.S. Attorney's Office and the steering committee, each site develops and implements its own Weed and Seed strategy.

[b]A grantee is an entity that receives funding from EOWS to implement the Weed and Seed program. The grantee distributes the funds to sites and is responsible for ensuring that sites comply with the terms of the grant. A grantee may have more than one site.

[c]Official recognition is a designation given to a grantee by EOWS that signifies that EOWS has approved the grantee's Weed and Seed strategy in a specific site. A grantee must receive official recognition from EOWS before a grantee can apply for funding. Official recognition requires, among other things, that the site develop a management plan and a comprehensive strategy for implementing the Weed and Seed strategy.

[d]The four required program elements that sites are required to address are (1) law enforcement; (2) community policing; (3) crime and substance prevention, intervention, and treatment; and (4) neighborhood restoration.

Appendix V: Activity Data Collected by EOWS in Fiscal Year 2003

Activity data collected by EOWS
1. Does site include a multijurisdictional task force
2. Does site participate in Project Safe Neighborhoods
3. Does site have foot patrols
4. Does site have bike patrols
5. Does site have substations
6. Does site have crime watch
7. Do police participate in community meetings
8. Number of homicides for 3 preceding calendar years for Weed and Seed site
9. Number of homicides for 3 preceding calendar years for entire jurisdiction
10. Number of total drug arrests[a]
11. Number of heroin drug arrests
12. Number of cocaine (not including crack) drug arrests
13. Number of crack cocaine drug arrests
14. Number of marijuana drug arrests
15. Number of methamphetamines only drug arrests
16. Number of safe haven facilities
17. Number of safe havens receiving EOWS funding
18. Does site provide academic courses and tutoring
19. Does site provide mentoring
20. Does site provide prevention education
21. Does site provide dispute resolution and mediation
22. Does site provide recreation and athletics
23. Does site provide job training
24. Does site provide job placement
25. Does site provide antidrug education
26. Does site provide community police co-located in safe haven
27. Does site provide safe corridors (school escorts for children)
28. Does site provide summer day camp
29. Does site provide youth leadership training
30. Does site provide boys and girls club programs
31. Does site provide scouting programs
32. Does site provide military cadet training
33. Does site provide antigang education and training

Activity data collected by EOWS
34. Does site provide Communities in Schools programs
35. Does site provide performance or applied arts programs
36. Does site provide victim assistance programs
37. Does site provide community projects, such as cleanups
38. Does site provide general health-screening services
39. Does site provide lead-poisoning-screening service
40. Number of persons receiving safe haven services
41. Number of community development corporations within site area
42. Is site constructing and renovating housing developments
43. Is site constructing and renovating commercial developments
44. Is site constructing and renovating business and community partnerships
45. Number of community cleanups done using EOWS support
46. Do Weed and Seed activities relate to or involve Brownfields Assessment Demonstration Pilots
47. Do Weed and Seed activities relate to or involve Brownfields Cleanup and Revolving Load Fund Pilots
48. Do Weed and Seed activities relate to or involve Brownfields Showcase Communities
49. Do Weed and Seed activities relate to or involve Brownfields Tax Incentive
50. Source of non-EOWS funding[b]
51. Amount of non-EOWS grant funding
52. Source and type of in-kind contributions

Source: EOWS data.

[a]In addition to the number of drug arrests, EOWS also requests that each site report the number of sale, manufacturing, and possession drug arrests for each type of drug.

[b]Non-EOWS grant funding includes funding from other federal, state, local, and private sources.

Appendix VI: Description of EOWS's Ongoing and Completed Studies

Title of study and research partner	Purpose of study	When results are expected
A Comparison of Homicide Trends in Local Weed and Seed Sites Relative to Their Host Jurisdictions, 1996 to 2001 Justice Research and Statistics Association (JRSA)	Compare homicides in Weed and Seed sites with homicides in the jurisdictions that sites are located in, to determine whether homicides will decline faster in Weed and Seed sites than in the remainder of the jurisdiction.	Report was expected in January 2004 but was issued in November 2003
Performance Indicator Study Urban Institute	Develop additional performance indicators that will be used by EOWS and Weed and Seed sites to evaluate program performance with respect to crime control.	March 2004
Weed and Seed Crime Pattern Data Collection Justice Research and Statistics Association	Summarize the types of crime selected as "target" crimes by Weed and Seed sites (sites choose three crimes) to determine crime reduction strategies. Assess the degree of success of Weed and Seed sites by analyzing the percentage of reduction in crime compared with the percentage in the rest of the jurisdiction that they are located in.	March 2004
Meta-Analysis Evaluation Justice Research and Statistics Association	Summarize the completed evaluations of individual Weed and Seed sites. The analysis will include more than 80 studies. JRSA's preliminary analysis (March 3, 2003) includes 36 evaluations. Of the 36 evaluations, JRSA determined that 5 were process, 19 were impact, and 9 were both process and impact evaluations. The remaining 3 evaluations were not identified as process or impact. Note: A process evaluation addresses whether the program is working as intended. An impact evaluation isolates the effects of a particular program or factor from all other potential contributing factors that could also effect change.	Mid 2004
Local Pilot Evaluations Local researchers	Conduct local evaluations of Weed and Seed sites. In fiscal year 2002, EOWS funded 13 local evaluations. Each site contracts with its own researcher.	Mid 2004

Source: EOWS and research organizations.

Appendix VII: Comments from the Department of Justice

U.S. Department of Justice

Office of Justice Programs

Office of the Assistant Attorney General

Washington, D.C. 20531

MAR 11 2004

Ms. Laurie E. Ekstrand
Director, Homeland Security and Justice Issues
General Accounting Office
441 G Street, N.W.
Mail Stop 2440A
Washington, DC 20548

Dear Ms. Ekstrand:

This letter responds to the General Accounting Office (GAO) draft report entitled, "*GRANTS MANAGEMENT: Despite Efforts to Improve Weed and Seed Program Management, Challenges Remain" (GAO-04-025)*. We agree, in part, with the recommendations, and we are in the process of implementing appropriate corrective actions to address the recommendations. However, we do not believe that GAO fully acknowledges in the draft report the steps the Executive Office for Weed and Seed (EOWS) has taken to address the recommendations concerning self-sustainability criteria and outcome measures included in the prior GAO report on EOWS. The draft report recommendations are restated below in bold, followed by our response.

1. **Maintain the documentation of the basis and rationale for qualification and funding decisions in appropriate grant files.**

   We agree that controls should be strengthened to ensure that the basis and rationale for qualification and funding decisions are documented in the centrally maintained Official Recognition (OR) files when applications are not funded. The Acting Director for the EOWS has directed the Program Managers to forward a copy of all documents supporting funding decisions to the centrally maintained OR files.

   GAO also criticizes EOWS for having incomplete grant files because a paper version of the application was not in the grant file. The applications were submitted electronically through the Office of Justice Programs (OJP's) Grants Management System (GMS). GMS has been a high priority of mine since being named Assistant Attorney General for OJP in September, 2001. As of the current fiscal year, OJP will not only post all solicitations and receive all grant applications via GMS, but also receive and maintain all grant progress reports on GMS. In this way, there will be no opportunity to misplace any

official document relating to any grant. Documents maintained in GMS are considered part of the official grant file in an electronic format. In compliance with the government's e-gov efforts, we no longer maintain paper copies of documents retained in GMS. Those documents, however, are readily available in electronic format and should be available to outside reviewers as well.

For the ease of the review process, we agree that applications should have been readily available to, and easily accessible by, GAO. In the future, the OJP's Office of the Comptroller (OC) will implement procedures to ensure that external reviewers are provided: 1) read-only access to GMS information, in coordination with OJP's Office of the Chief Information Officer; or 2) hard copies of pertinent GMS information.

2. **Retain progress reports and site visit reports in official grant files.**

We agree with the recommendation. EOWS and OC will strengthen controls to ensure that copies of completed site visit reports are included in the official grant file maintained in OC. Additionally, as part of GMS, OJP is developing a monitoring module that will enable Program Managers to record and report on site visits directly in GMS. When that module is available, it will be the policy of OJP to require that grant managers submit the reports in this manner, thus making the entire file fully accessible and fully contained in GMS.

Beginning with the semiannual progress reporting period that ended on December 31, 2003, OJP implemented a progress reporting module in GMS that enables grantees to submit semiannual progress reports electronically. As stated in response to Recommendation 1, documents maintained in GMS are considered a part of the official grant file in an electronic format, and all grantees are now required to submit their semiannual progress reports electronically. Finally, OJP in 2002 adopted a policy of withholding further fund drawn-down capability from any grantee who fails to file timely progress reports.

3. **Clearly define criteria to assess when sites are self-sustaining and apply the criteria to sites when making further funding decisions.**

We agree, in part, with the recommendation. EOWS will further define the criteria to assess when sites are self-sustaining and apply the criteria when making funding decisions. Further, we are promoting a "graduation" process to bring sites to sustainability and cease providing Weed and Seed funding to those sites, thus making funding available to assist newer developing sites.

Mr. Page 3
Letter to Ms. Laurie E. Ekstrand

However, we do not agree with GAO's assertion on page 12 of the draft report that EOWS has never set criteria for self-sustainability. EOWS set a criterion for self-sustainability in the FY2003 Weed and Seed Competitive Application Kit: "Does the application provide for a full-time coordinator funded by reallocation of existing resources other than the Weed and Seed grant?" The applications were ranked against this criterion. In March 2004, EOWS will announce an additional criterion specific to measuring self-sustainability. This new criterion will require grant applicants to identify other funding sources at a level five times the EOWS contribution. This criterion will be considered when making funding decisions.

4. **Develop outcome performance measures–or, where measuring outcome is, after careful consideration, deemed infeasible, intermediate measures–that can be used to adequately track progress toward program outcomes of the Weed and Seed program.**

We fully agree that developing outcome performance measures is important. This, too, is a high personal priority of mine, and OJP's Office of Budget and Management Services is working with every OJP grant program to develop outcome measures (and, in appropriate cases, interim measures). EOWS has been working to develop measures that track progress toward program outcomes in the Weed and Seed Program.

As early as 1997, EOWS enlisted the assistance of experts in the field, such as the Justice Research and Statistics Association (JRSA), who contracted with John O'Connell, Director, Statistical Analysis Center in Delaware, to advise on the appropriate outcome measures.

O'Connell concluded, in a recent study, that measuring reductions of homicides is an adequate performance measure of the Weed and Seed program because of its reliability and explicit selection as a goal by over 30 percent of the Weed and Seed Sites participating in the Crime Pattern Study. In addition, the Department of Justice includes a five percent reduction in homicides in Weed and Seed sites as part of its Strategic Plan.

On March 2, 2004, JRSA submitted the following summaries of two studies that were conducted recently: (1) Analysis of Homicide in Weed and Seed Sites; and (2) Crime Patterns Analysis (Three-Top Crime Study).

Mr. Page 4
Letter to Ms. Laurie E. Ekstrand

Evaluation	Summary
Analysis of Homicide in Weed and Seed Sites	One of the overriding goals of the national Weed and Seed strategy is to reduce violence in some of the nation's most crime-ridden neighborhoods. As part of GPRA homicide data have been collected for Weed and Seed sites since 1996 as one measure of violence. For this multi-year analysis, the most recent GPRA reporting is for 2001. Over this six year period 220 sites provided sufficient homicide information for both the Weed and Seed sites and their host jurisdictions (newer sites do not yet have enough history for analysis). Seventy-seven percent of the Weed and Seed sites had positive results in their homicide trends when compared to host jurisdictions. In most of the sites (122) homicides decreased by about 50 percent (from an average of about 10 homicides per site in 1996 to 5 per site in 2001). In 31 sites (14%), the number of homicides remained stable while the homicide statistics for their respective jurisdictions increased and in 17 sites (8%), homicides increased at a slower rate than their jurisdictions. These trends in the most serious of crimes were a significant accomplishment for Weed and Seed sites considering that homicides in the host jurisdictions (and the nation) increased in 2000 and 2001.
Crime Pattern Analysis (Three-Top Crime Study)	As a voluntary effort to provide more information regarding the extent of crime reduction in Weed and Seed sites, EOWS solicited comparative crime information in mid-2003 from all active Weed and Seed sites. The Weed and Seed sites were asked to submit information regarding the top three crime issues. To be included in the analysis crime information both prior to and following the implementation of their Weed and Seed operations had to be provided. By the fall of 2003, 98 sites had submitted crime pattern information. Forty percent of the sites were able to provide crime data for both pre and post time periods. Forty-one percent of the sites had not implemented their Weed and Seed strategy long enough to conduct a pre/post crime analysis. The remainder of the sites had data inconsistencies that allow for only a partial analysis of the information provided. Preliminary analysis show, that as expected, reported crimes increase during the initial phases of a Weed and Seed operation but that after the third year of program implementation sites encounter a significant decrease in reported crimes within the Weed and Seed site areas. This decrease is apparent both in the total number of each crime reported for the Weed and Seed sites as well as in the proportion of city-wide or jurisdiction-wide crime accounted for by the Weed and Seed target area. Ninety-four percent of the sites are addressing violent crimes or homicide as one of their key crime initiatives.

Mr. Page 5
Letter to Ms. Laurie E. Ekstrand

OJP wishes to stress its full commitment to outcome measurement, even in cases, such as a Weed and Seed strategy, which, as the GAO report suggests, may not easily lend itself to measurement due to multiple factors potentially affecting those outcomes. We will continue to work towards this goal.

We would like this information and the above summaries included in GAO's report. As always, OJP appreciates the opportunity to comment on the draft report. Thank you for your continued cooperation and assistance.

Sincerely,

Deborah J. Daniels
Assistant Attorney General

cc: Robert Samuels, Acting Director
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Appendix VIII: GAO Contacts and Staff Acknowledgments

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In addition to those named above, the following individuals made key contributions to this report: Lisa G. Shibata, Kirstin B. L. Nelson, Cady L. Summers, David Alexander, Sidney Schwartz, Kevin L. Jackson, Elizabeth Curda, Tom James, Denise Fantone, Jan Montgomery, Ann H. Finley, Katherine M. Davis, and Leo Barbour.

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